

Draft Environmental Impact Report



for

Tentative Tract Map 83232 Residential Project

SCH# 2021090009



City of
Lancaster

February 2022

DRAFT
Environmental Impact Report
TTM 83232 Residential Project

Prepared for:

City of Lancaster
Community Development Division



Prepared by:



February 2022

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Executive Summary

This Draft Environmental Impact Report (EIR) has been prepared to address the environmental effects associated with implementation of the proposed Tentative Tract Map (TTM) 83232 Residential Project (proposed project). Royal Investors Group, LLC has submitted a TTM, variance and application to the City of Lancaster for the construction of 86 single-family detached homes on an undeveloped 20-acre parcel west of the intersection of 60th Street West and West Avenue K-12.

The City of Lancaster, as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this EIR for the proposed project. This EIR is an informational document for the general public and governmental agencies to review and evaluate the proposed project. The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the proposed project and alternatives; rather, the complete EIR should be consulted for specific information about the environmental effects and the implementation of associated mitigation measures.

ES.1 Summary of Proposed Project

The project site is an undeveloped parcel at the northwest corner of 60th Street West and Avenue K-12 within the City of Lancaster (refer to Figure ES-1, Project Site and Location). The project is located on Assessor's Parcel Number (APN) 3204-008-048, which is zoned R-7,000 (single-family residential, minimum lot size 7,000 square feet (sf)). The proposed project includes the subdivision of the 20-acre site into 86 single-family residential lots, variance for the reduction of lot width and lot depth standards and the construction of 86 single-family detached homes. A site plan for the proposed project is provided as Figure B-1, Site Plan. The project also includes construction of the following roads to provide vehicle access to the new homes:

- Extending 62nd Street West and Hampton Street to the south.
- Constructing new Street "L," Street "M," Street "N," and a new Avenue K-12 cul-de-sac.

In addition, the proposed project would extend the existing water and sewer lines that are available immediately north of the site to serve the development. These new utility lines would be buried underneath the new roadway segments.

ES.2 Environmental Review Process

The City of Lancaster prepared and transmitted a Notice of Preparation (NOP) for this EIR on August 31, 2021. This Draft EIR is being released for agency and public review for a 45-day public review period. After completion of the public review period, all comments received on the Draft EIR would be reviewed and written responses would be prepared, along with any necessary revisions to the Draft EIR for the purposes of its finalization. The City of Lancaster Planning Commission would review and certify the Final EIR; following certification, the Planning Commission would make findings on any significant environmental effects and consider approval of the project.

ES.3 Areas of Controversy and Issues to be Resolved

Evaluation of the proposed project under CEQA was initiated on August 31, 2021. As of the publication of this Draft EIR, no areas of controversy or issues in need of resolution have been communicated to the City of Lancaster. Additionally, there are no remaining technical project description issues or environmental review issues left to be resolved.

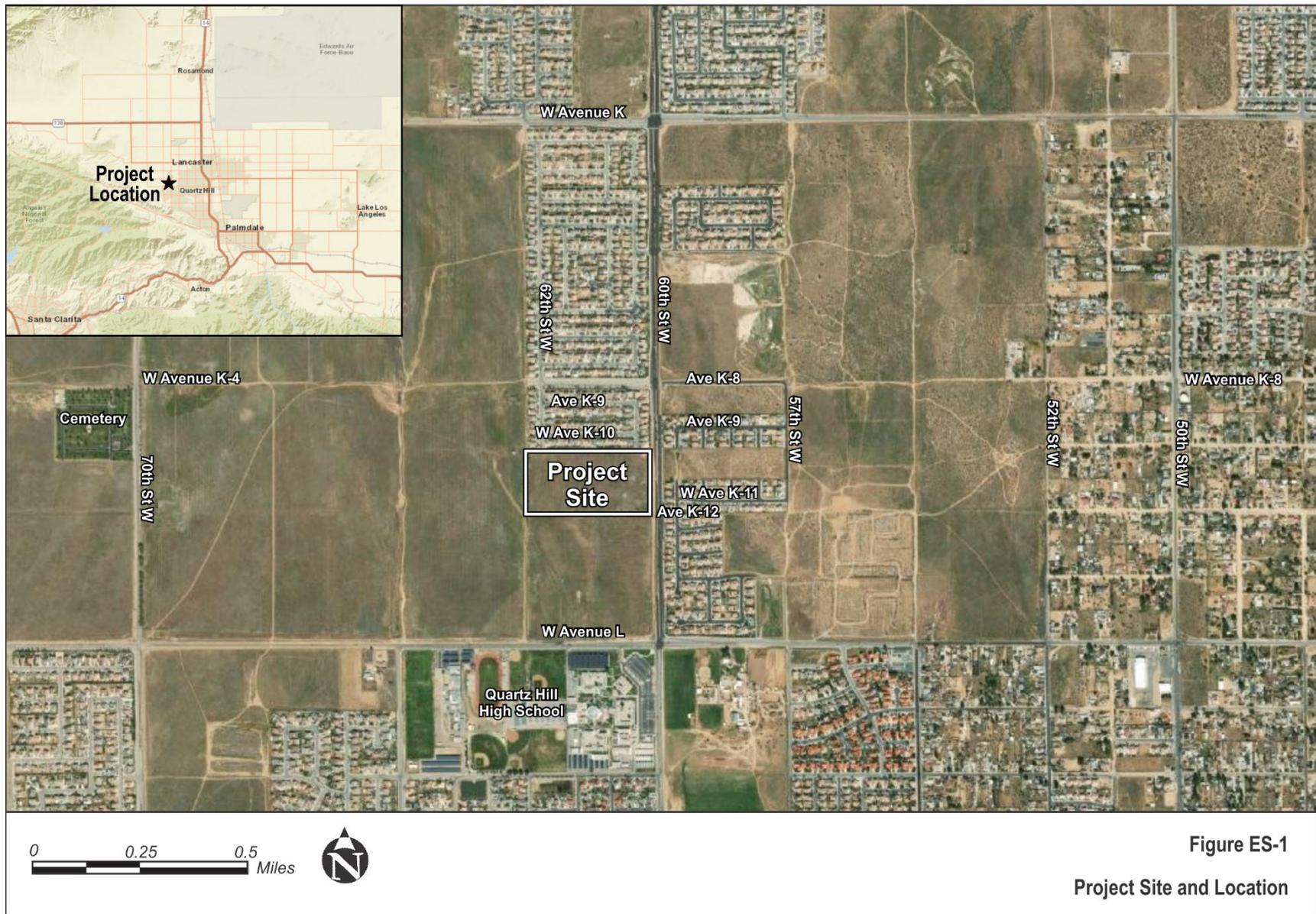


Figure ES-1
Project Site and Location

ES.4 Summary of Alternatives Analysis

Section D (Alternatives) provides a description of the project alternatives. The No Project Alternative is also evaluated, as required under §15126.6 (e) of the California Code of Regulations. The alternatives analysis includes a discussion of alternatives that were dismissed from further consideration, as well as a comparative analysis of a reasonable range of potentially feasible project alternatives. The alternatives in the comparative analysis include the following:

- **No Project Alternative.** Under this alternative, the proposed project would not be constructed and the project site would remain in its current condition. However, due to the site being zoned R-7,000 (Residential), there is a high probability that it would be developed with residential uses in the future.
- **Alternative 1 (Reduced Project Alternative).** Alternative 1 consists of developing the site with residential homes, identical to the proposed project, but with a decrease in the number of homes. This alternative seeks to avoid or reduce significant and unavoidable transportation impacts of the proposed project by decreasing vehicle miles travelled (VMT) associated with the proposed project.

ES.4.1 Environmentally Superior Alternative

Based on the analysis contained in Section C (Environmental Impacts Analysis) and Section D (Alternatives) of this EIR, the proposed project is the environmentally superior alternative. The proposed project best accomplishes developing the site with residential uses while being consistent with the zoning designation of the site. Additionally, alternatives to the project were not found to substantially reduce or avoid VMT impacts associated with the project. As described in Section C (Alternatives), the No Project Alternative and Alternative 1 would result in similar impacts as the proposed project.

ES.5 Summary of Impacts and Mitigation Measures

Section C (Environmental Impacts Analysis) of this EIR presents the direct and indirect impacts associated with the proposed project, as well as its incremental contribution to cumulative effects. As discussed, the proposed project would result in significant and unavoidable VMT impacts. As discussed in Appendix B, Initial Study, all other impacts associated with the project were found to be less than significant or reduced to a level of less than significant with the implementation of mitigation measures, as summarized in Table ES-1.

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
Aesthetics		
a) Have a substantial adverse effect on a scenic vista?	■ No mitigation is required.	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a state scenic highway?	■ No mitigation is required.	Less than Significant

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
c) In non-urbanized areas, substantially degrade the existing visual character or quality or public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	▪ No mitigation is required.	Less than Significant
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?	▪ No mitigation is required.	Less than Significant
Agricultural Resources and Forestry Resources		
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	▪ No mitigation is required.	No Impact
b) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	▪ No mitigation is required.	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	▪ No mitigation is required.	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	▪ No mitigation is required.	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	▪ No mitigation is required.	No Impact
Air Quality and Greenhouse Gases		
a) Conflict with or obstruct implementation of the applicable air quality plan?	▪ No mitigation is required.	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	▪ No mitigation is required.	Less than significant
c) Expose sensitive receptors to substantial pollutant concentrations?	1. Valley Fever Training Handout and Session including use of PPE and requirements for PPE	Less than significant with mitigation

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	▪ No mitigation is required.	Less than significant
Biological Resources		
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	2. Burrowing Owl Protocol Surveys 3. Passive Relocation Program by Qualified Biologist 4. Burrowing Owl Exclusion and Mitigation Plan and Mitigation Land Management Plan 5. Nesting Bird Survey	Less than significant with mitigation
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	▪ No mitigation is required.	No impact
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	▪ No mitigation is required.	No impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	▪ No mitigation is required.	No impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	▪ No mitigation is required.	No impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	▪ No mitigation is required.	No impact
Cultural Resources		
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	▪ No mitigation is required.	Less than significant

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to §15064.5?	6. Halt Work if Resources Found; Qualified Archeologist to review. 7. Tribal Input 8. Contact Corner for Human Remains 9. Cultural Resource Treatment Plan if Avoidance not possible 10. Cultural Resources Monitoring and Treatment Plan, if needed 11. Provide Archeological/Cultural Documents to SMBMI	Less than significant with mitigation
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	▪ No mitigation is required.	No impact
Energy		
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	▪ No mitigation is required.	No impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficient?	▪ No mitigation is required.	No impact
Geology and Soils		
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:		
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	▪ No mitigation is required.	No impact
ii) Strong seismic ground shaking?	▪ No mitigation is required.	Less than significant
iii) Seismic-related ground failure, including liquefaction?	▪ No mitigation is required.	No impact
iv) Landslides?	▪ No mitigation is required.	No impact
b) Result in substantial soil erosion or the loss of topsoil?	12. Dust Control Plan	Less than significant with mitigation
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	▪ No mitigation is required.	No impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	▪ No mitigation is required.	Less than significant

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	▪ No mitigation is required.	No impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	▪ No mitigation is required.	No impact
Greenhouse Gas Emissions		
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	▪ No mitigation is required.	Less than significant
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	▪ No mitigation is required.	Less than significant
Hazards and Hazardous Materials		
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	▪ No mitigation is required.	No impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	▪ No mitigation is required.	No impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	▪ No mitigation is required.	No impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	13. Soil Sampling and Testing	Less than significant with mitigation
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	▪ No mitigation is required.	No impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	▪ No mitigation is required.	No impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	▪ No mitigation is required.	Less than significant
Hydrology and Water Quality		
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	▪ No mitigation is required.	Less than significant

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	▪ No mitigation is required.	Less than significant
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:		
i) Result in substantial erosion or siltation on- or off-site	▪ No mitigation is required.	Less than significant
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site	▪ No mitigation is required.	Less than significant
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff	▪ No mitigation is required.	Less than significant
iv) Impede or redirect flood flows	▪ No mitigation is required.	Less than significant
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	▪ No mitigation is required.	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	▪ No mitigation is required.	Less than significant
Land Use and Planning		
a) Physically divide an established community?	▪ No mitigation is required.	No impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	▪ No mitigation is required.	Less than significant
Mineral Resources		
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	▪ No mitigation is required.	No impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	▪ No mitigation is required.	No impact

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
Noise		
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	14. No construction between 8 p.m. and 7 a.m. on Weekdays and Saturday. No construction on Sundays 15. Onsite Construction Supervisor to Resolve Complaints 16. Use Electric Powered Equipment 17. Local Equipment/Vehicles away from Sensitive Receptors 18. Limit Use of Noise Producing Signals 19. No Public Address or Music 20. Use Mufflers or Silencers to Shield Noise	Less than significant with mitigation
b) Generation of excessive groundborne vibration or groundborne noise levels?	▪ No mitigation is required.	Less than significant
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	▪ No mitigation is required.	Less than significant
Population and Housing		
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	▪ No mitigation is required.	Less than significant
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	▪ No mitigation is required.	No impact
Public Services, Utilities, and Service Systems		
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire Protection?	▪ No mitigation is required.	Less than significant
Police Protection?	▪ No mitigation is required.	Less than significant
Schools?	▪ No mitigation is required.	Less than significant

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
Parks?	▪ No mitigation is required.	Less than significant
Other Public Facilities?	▪ No mitigation is required.	Less than significant
Recreation		
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	▪ No mitigation is required.	Less than significant
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	▪ No mitigation is required.	Less than significant
Transportation and Traffic		
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	▪ No mitigation is required.	No impact
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? Impact TR-1: The Project would Generate VMT Exceeding the City's Thresholds	No mitigation is available to lessen or avoid this impact.	Significant and Unavoidable
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	▪ No mitigation is required.	No impact
d) Result in inadequate emergency access?	▪ No mitigation is required.	No impact
Tribal Cultural Resources		
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	▪ No mitigation is required.	No impact

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	▪ No mitigation is required.	Less than significant
Utilities and Service Systems		
a) Require or result in the relocation or construction or new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	▪ No mitigation is required.	Less than significant
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	▪ No mitigation is required.	Less than significant
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	▪ No mitigation is required.	Less than significant
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?	▪ No mitigation is required.	Less than significant
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	▪ No mitigation is required.	Less than significant
Wildfire		
a) Substantially impact an adopted emergency response plan or emergency evacuation plan?	▪ No mitigation is required.	No impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	▪ No mitigation is required.	No impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	▪ No mitigation is required.	No impact

Table ES-1. Summary of Impacts and Mitigation Measures		
Criteria/Impact	Summary of Mitigation Measures	Level of Significance
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	▪ No mitigation is required.	No impact

A. Introduction

A.1 Purpose and Intended Uses of the EIR

This Environmental Impact Report (EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA). The City of Lancaster is the Lead Agency under CEQA. CEQA requires the Lead Agency to consider the information contained in an environmental review document, in this case an EIR, prior to taking any discretionary action. This EIR serves as an informational document to be considered by the City of Lancaster when making their discretionary approval of the proposed project and for other agencies and interested parties during their respective review of the proposed project.

This EIR evaluates potential environmental impacts and identifies recommended mitigation measures to offset direct, indirect, and cumulative impacts associated with the proposed project’s implementation. This EIR also identifies and evaluates the impacts of alternatives to the proposed project, discloses growth-inducing impacts, and identifies its significant and unavoidable effects and significant irreversible environmental changes.

A.2 Overview of the Proposed Project

The project site is an undeveloped parcel at the northwest corner of 60th Street West and Avenue K-12 within the City of Lancaster (refer to Figure ES-1, Project Site and Location). The project is located on Assessor’s Parcel Number (APN) 3204-008-048, which is zoned R-7,000 (single family residential, minimum lot size 7,000 square feet [sf]). The proposed project includes the subdivision of the 20-acre site into 86 single family residential lots, variance for the reduction of lot width and lot depth standards and the construction of 86 single-family detached homes. A site plan for the proposed project is provided as Figure B-1, Site Plan. The project also includes construction of the following roads to provide vehicle access to the new homes:

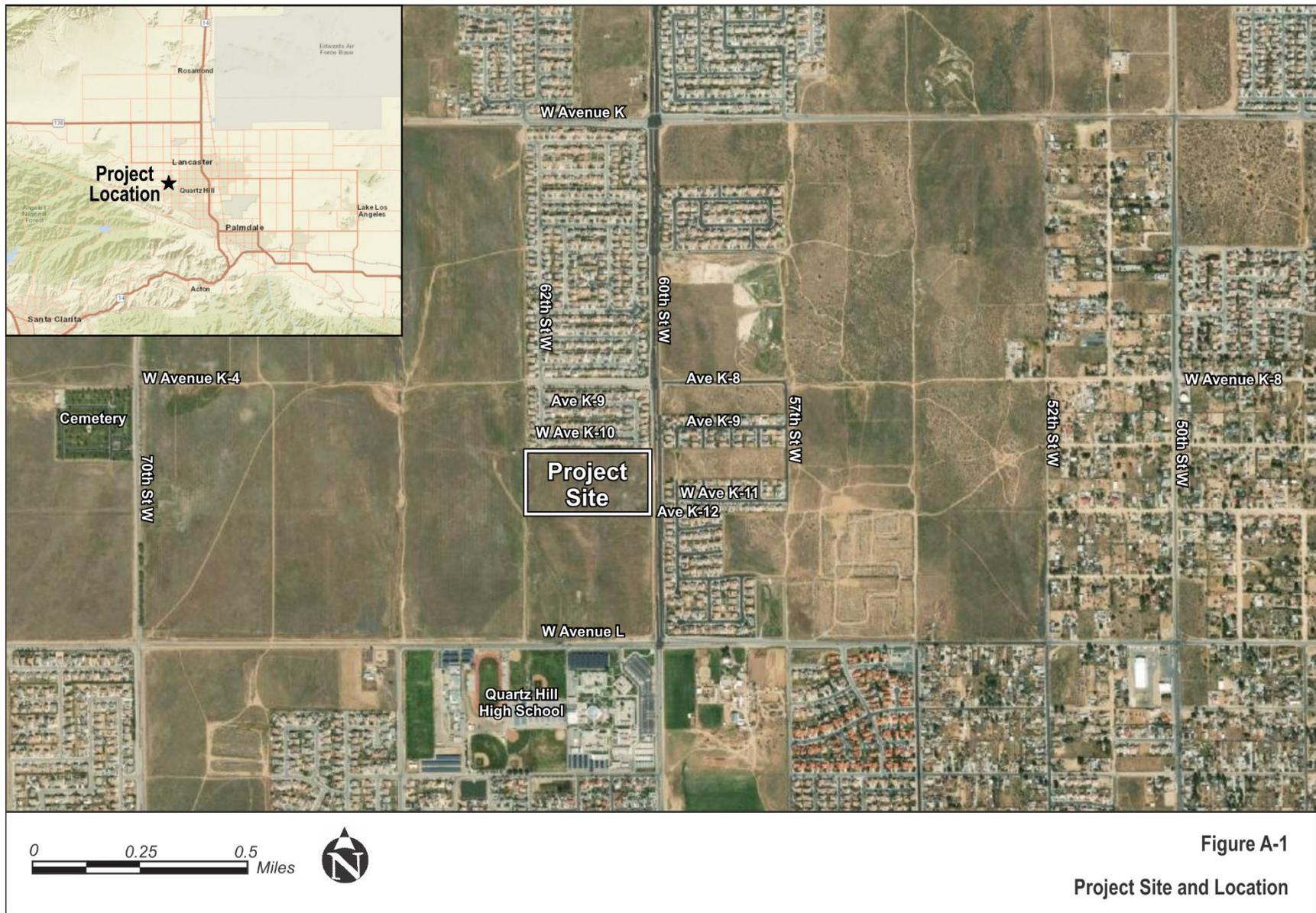
- Extending 62nd Street West and Hampton Street to the south.
- Constructing new Street “L,” Street “M,” Street “N,” and a new Avenue K-12 cul-de-sac.

In addition, the proposed project would extend the existing water and sewer lines that are available immediately north of the site to serve the development. These new utility lines would be buried underneath the new roadway segments.

A.3 Required Permits and Approvals

The project site is located on one parcel that is zoned R-7,000. The City’s zoning ordinance allows development of the site with single-family residential uses at the density proposed under the proposed project. However, the project would require the approval of a Tentative Tract Map to create the individual 86 lots among other discretionary actions. Table A-1, Permits and Approvals, provides a list of permits/approvals needed for the proposed project.

Permit/Approval	Authorizing Agency
Tentative Tract Map and Variance Approval	City of Lancaster
Grading Permit	City of Lancaster
Building Permit	City of Lancaster
Sewage Service – Annexation	Los Angeles County Sanitation District
Equipment Permits, as applicable; approval of Dust Control Plan	Antelope Valley Air Quality Management District
Transportation Permit (heavy equipment on State Highway)	Caltrans District 7



A.4 EIR Process

A.4.1 Distribution of NOP

In compliance with Sections 15082 and 15375 of the State CEQA Guidelines, a Notice of Preparation (NOP) was prepared by the City of Lancaster Development Services Department and distributed to the State Clearinghouse, Office of Planning and Research, Trustee and Responsible Agencies and other interested parties on August 31, 2021. The NOP was circulated for a 30-day public review period. The NOP was also provided to property owners located within 500 feet of the project site. In addition to distribution of the NOP, the City placed a newspaper notice in the Antelope Valley Press on August 31, 2021 and posted the NOP at the Los Angeles County Clerk. The NOP included a description of the project, the location of the project indicated on an attached map, the important environmental issues of the project, and the probable environmental effects of the project.

A.4.2 Public Scoping

The scoping comment period began on August 31, 2021, with the release of the NOP and ended on October 1, 2021. Five scoping comment letters were received on the NOP from the Antelope Valley Air Quality Management District, California Department of Fish and Wildlife, California Department of Transportation, Los Angeles County Sanitation Districts, and Native American Heritage Commission; these comment letters, as well as the NOP, are included in Appendix A. A public scoping meeting was not held for the project, as the City of Lancaster (as CEQA Lead Agency) determined the project does not have statewide, regional, or area-wide significance (pursuant to CEQA Guidelines § 15206). Furthermore, after issuing the NOP, a scoping meeting was not requested by a Responsible Agency, Trustee Agency, the Office of Planning and Research, or the project applicant (pursuant to CEQA Guidelines § 15082).

A.4.3 Availability of Draft EIR

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. Comments may be sent anytime during the 45-day EIR comment period. The EIR review and comment period begins on February 25, 2022 and ends on April 11, 2022. After completion of the 45-day review period, a Final EIR will be prepared that responds to comments on the Draft EIR submitted during the review period and modifies the Draft EIR as necessary. Public hearings on the proposed project will be held after completion of the Final EIR. Notice of the time and location of future public hearings will be provided prior to each public hearing date. All comments or questions about the Draft EIR should be addressed to:

City of Lancaster
Attn: Cynthia Campana
Senior Planner
44933 Fern Avenue
Lancaster, CA 93534
ccampana@cityoflancasterca.org

Figure A-2 provides a flowchart of the EIR process. The City has completed the initial steps of the EIR process as discussed in this section and will continue through the process as required by CEQA. An Initial Study was prepared for the proposed project and is included in Appendix B.

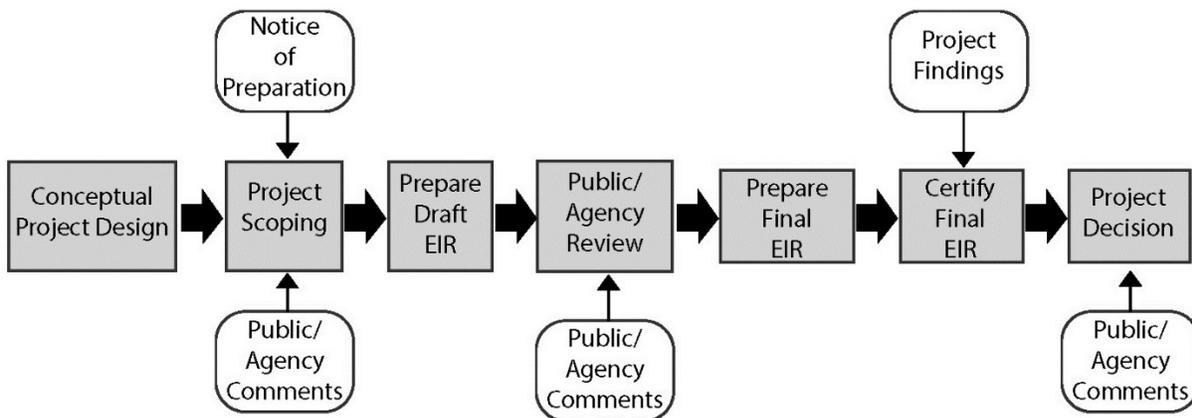


Figure A-2. The EIR Process

A.5 Organization of the EIR

This EIR contains the information and analysis required by CEQA Guidelines Sections 15120 through 15132. Each of the required elements is covered in one of the EIR sections or their related appendices, which are organized as follows:

- **Executive Summary.** Provides a description of the proposed project’s environmental review process, a summary of the proposed project attributes and its impacts, a brief description of the proposed project’s alternatives and identification of the environmentally superior alternative, and a summary of the proposed project’s areas of known controversy and issues in need of resolution.
- **Section A – Introduction** contains a summary of the EIR’s purpose and the project objectives as well as comments received during project scoping.
- **Section B – Project Description** provides details on the proposed project, including the general environmental setting, project background, construction plan, operation and maintenance, and required permits and approvals. Section B also includes the cumulative scenario, which provides a list of related projects and describes the methodology used in the cumulative assessment.
- **Section C – Environmental Impacts Analysis** details environmental setting information, applicable regulations and standards, proposed project impacts, and proposed mitigation measures for specific resource areas. Section C.1 provides the approach to the environmental analysis, as well as a discussion of the resource areas for which the proposed project would result in no impacts or less-than-significant impacts. Detailed analyses for potential direct, indirect and cumulative environmental impacts of the proposed project are included in Section C.2, Transportation, and Appendix B, Initial Study, of this EIR.
- **Section D – Alternatives** provides a comparison of the proposed project’s impacts with those of project alternatives developed by the City of Lancaster.
- **Section E – Other CEQA Considerations** addresses other applicable CEQA requirements, including an analysis of growth-inducing effects, significant irreversible commitment of resources, and significant effects that cannot be avoided.
- **Section F – References** lists all of the informational references cited in this EIR.
- **Section G – Consultation and EIR Preparers** lists the preparers of the EIR document.

B. Project Description

B.1 Introduction

The project site is an undeveloped parcel at the northwest corner of 60th Street West and Avenue K-12 within the City of Lancaster (refer to Figure A-1). The proposed project will be located on APN 3204-008-048, which is zoned R-7,000.

B.2 Project Objectives

Specifically, the project objectives are to:

- Make productive use of a vacant property by developing the site with residential uses consistent with the current City of Lancaster zoning designation.
- Increase the available single-family residential housing stock within the City of Lancaster.
- Build an integrated, high-quality development that has a range of single-family home sizes to offer home ownership opportunities attainable to a variety of household types and income levels.
- Expand the utilities and infrastructure necessary to support project site development, while reducing negative impacts to the greater community.

B.3 Project Description

The proposed project includes the subdivision of the 20-acre project site into 86 lots, variance for the reduction of lot width and lot depth standards and the construction of 86 single-family detached homes on 20-acre parcel. The site plan for the proposed project is shown in Figure B-1. The proposed project also includes construction of the following roads to provide vehicle access to the new homes:

- Extending 62nd Street West and Hampton Street to the south.
- Constructing new Street “L,” Street “M,” Street “N,” and a new Avenue K-12 cul-de-sac.

In addition, the project would extend the existing water and sewer lines that are available immediately north of the site to serve the development. These new utility lines would be buried underneath the new roadway segments. The roadway extensions would also include street lighting and sidewalks.

B.3.1 Home Details

The 86 homes to be constructed would be a blend of one-story and two-story structures. The overall proposed project’s architecture would reflect an American Traditional/American Cottage design; characteristic elements include windows with wood shutters, the use of brick veneer and/or wood siding and trim above doors and windows. Combined one- and two-story massing with single story elements and gabled roofs with dormered windows are classic variations of this style. The proposed stucco colors are predominately cream, white, beige, tan and brown.



American Traditional One-Story (Example)



American Traditional Two-Story (Example)

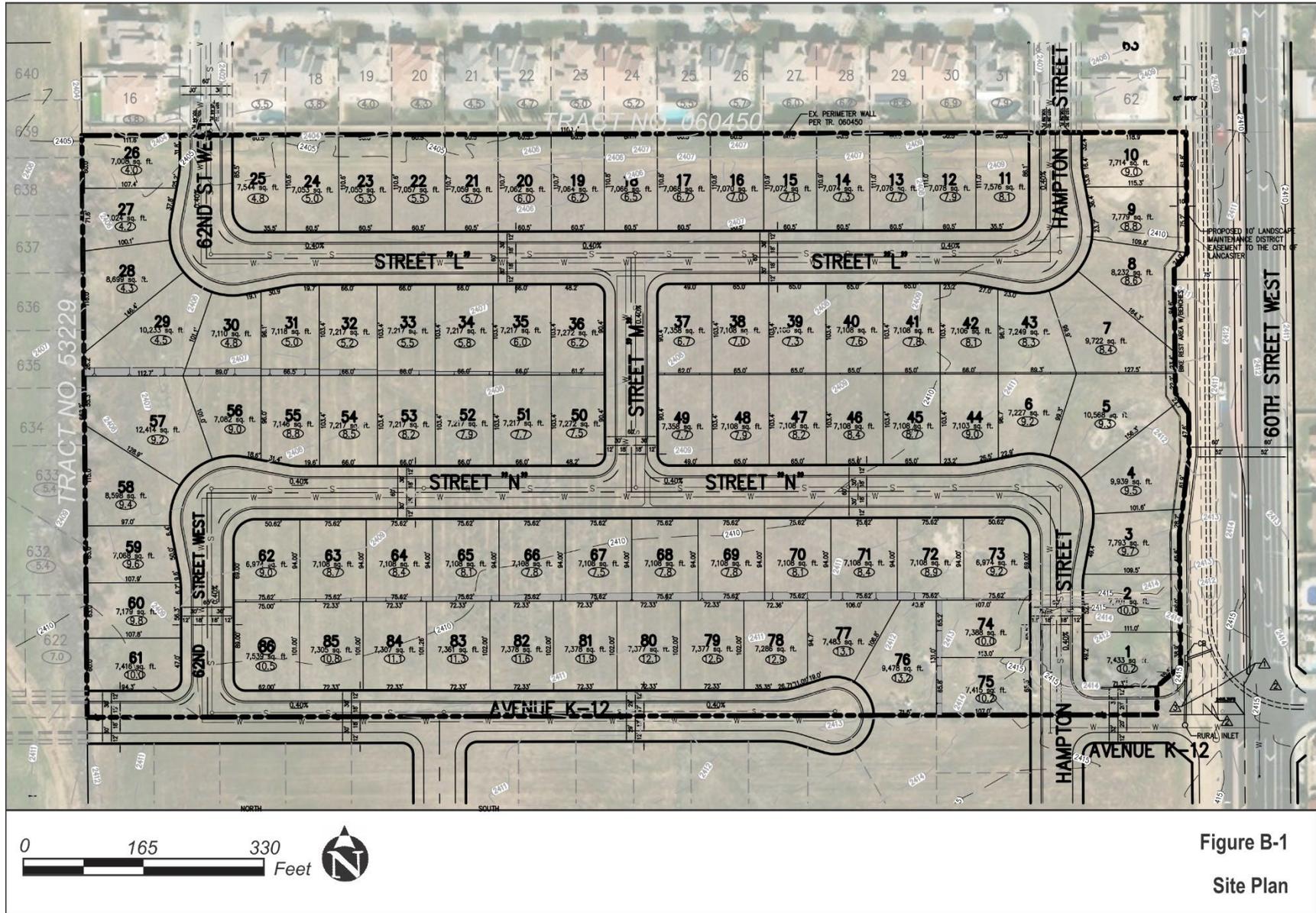
Typical characteristics of this architectural style include:

- Rectangular or asymmetrical massing with some recessed second floors;
- Breaks in massing;
- Composition shingles;
- Distinctive roof over entry;
- Use of dormers;
- Front porch with wood-like or stucco columns; and
- Wood or wrought iron balcony railings.

The trim colors could be various shades of taupe, green, and beige and the proposed shutter colors are brown, rust, green and beige. The fascia, trim and garage doors range could range in colors from beige to browns and tans. The roof materials would be in shades of browns and shall be varied to create visual interest. The proposed elevations of the development would be subject to review by Development Services Director prior to the issuance of construction permits.

B.3.2 Construction Details

The proposed new buried utilities and new/extended roads would be built first. This would involve minor grading and trenching, followed by installing new utility lines, backfilling, and paving the roads. Completing these road extensions first would ensure that construction-related trips can use the proposed new extension of Avenue K-12 at 60th Street West to access the home sites (to avoid having to travel through the existing residential area directly north of the project site). Once that is complete, multiple homes would be built simultaneously per phase. It is expected 10-15 homes would be constructed per phase, with the estimated timeframe for constructing each home being 6 months. Therefore, each 10-15 homes built per phase would take 6 months, resulting in the total construction period lasting 2-3 years to build all 86 homes (with estimated project completion by the end of 2024).



C. Environmental Setting, Analysis, and Mitigation Measures

C.1 Introduction to Environmental Analysis

Section C presents the analysis of potential direct, indirect, and cumulative environmental impacts of the proposed project. Alternatives are addressed in Section D. CEQA requires that an EIR address potentially significant environmental effects; this analysis is included in Section C.2, Transportation, Vehicle Miles Travelled [VMT] Impacts, of this EIR.

For all remaining environmental resource areas, this EIR has determined that impacts of the proposed project would not be significant. Appendix B, Initial Study Checklist, provides a summary and explanation of the conclusions for each of these resource areas (as allowable under CEQA Guidelines Section 15128). CEQA Guidelines Section 15128 also requires that an EIR briefly explain the reasons why certain effects associated with a project have been determined not to be significant, and therefore not discussed in detail in the EIR. As presented in Appendix B, Initial Study Checklist, the proposed project would result in no impact, less than significant impacts, or less than significant impacts with mitigation to the following resources:

- Aesthetics
- Agriculture and Forestry Resources
- 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
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation (all except VMT)
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Summary descriptions of each of these resources and an explanation of why the proposed project would not result in significant impacts are presented in Appendix B.

C.1.1 Organization of Section C

Based on the analysis presented in the Initial Study (Appendix B), this EIR addresses one issue, transportation impacts associated with the proposed project, specifically impacts related to operational VMT. This detailed analysis is presented in Section C.2, Transportation.

C.1.2 Environmental Assessment Methodology

The methodology used to determine potential project impacts identified in the Initial Study (Appendix B) and Section C of this EIR comprises four key components. Each of these components is summarized below and discussed under the resource area addressed in Section C.

- **Environmental Setting.** In most cases, the description of existing conditions in the environmental setting focuses on the immediate vicinity of the project site (sensitive receptors, public roadways, existing water system infrastructure, etc.). For some resources, such as air quality (as discussed in Appendix B), regional information may also be presented.

- **Applicable Regulations, Plans, and Standards.** This includes a description of federal, State, and local regulatory framework applicable to the assessment of project impacts.
- **Environmental Impacts and Mitigation Measures.** This includes the procedures followed to determine the type and magnitude of impacts that would occur, thresholds of significance, and project impacts and mitigation measures.
 - **Thresholds of Significance.** Resource-specific thresholds, where appropriate, are used to evaluate the significance of environmental impacts. They are based on available City of Lancaster thresholds, augmented where appropriate with those identified in the Initial Study Checklist included in Appendix G of the CEQA Guidelines (refer to Appendix B).
 - **Project Impacts.** Each resource area analysis identifies direct and indirect impacts that would occur absent mitigation measures. Direct impacts are those that are caused by and immediately related to the proposed project. Indirect impacts would occur later in time or farther removed in distance but are still reasonably foreseeable effects of the proposed project. The following determinations are used for classifying project-related impacts:
 - **Significant and unavoidable impact;** an adverse impact that cannot be mitigated to a level that is less than significant;
 - **Significant impact** that can be mitigated to a level of less than significant through the implementation of recommended mitigation measures;
 - **Less than significant impact;** an impact that is adverse but less than significant and mitigation is therefore not required;
 - **Beneficial impact;** an impact that improves environmental conditions either directly or indirectly and mitigation is therefore not required; and
 - **No Impact;** circumstances under which no direct or indirect effect would occur and mitigation is therefore not required.
- **Level of Significance after Mitigation.** This section identifies the level of significance under CEQA, after implementation of environmental commitments and mitigation measures identified by the City of Lancaster to mitigate significant project impacts.

Impact Significance

Based on the impact assessment methodology presented above, each specific impact for each resource area is assigned one of the following impact levels:

- **Class I:** Significant impact; cannot be mitigated to a level that is less than significant.
- **Class II:** Significant impact; can be mitigated to a level that is less than significant through the implementation of recommended mitigation measures.
- **Class III:** Adverse impact; but less than significant so mitigation is not normally recommended.
- **Class IV:** Beneficial impact; mitigation is not required.
- **No Impact.** The specific impact question or resource would not be affected by the proposed project.

C.1.3 Cumulative Scenario and Methodology

Cumulative effects are those impacts from related projects that would occur in conjunction with the proposed project. To document the process used to determine cumulative impacts, this section provides

the CEQA requirements, the methodology used in the cumulative assessment, and the projects identified and applicable to the cumulative analysis. Section C.2 provides the analysis of cumulative impacts for transportation VMT.

CEQA Requirements

CEQA requires that cumulative impacts be analyzed in an EIR when the resulting impacts are cumulatively considerable, and therefore, potentially significant. The discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion does not need to be as detailed as the discussion of environmental impacts attributable to the proposed project alone. Further, the discussion is intended to be guided by the standards of practicality and reasonableness. As stated in Public Resources Code Section 21083(b), “a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable.”

According to Section 15355 of the 2021 CEQA Statute and Guidelines:

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

(a) The individual effects may be changes resulting from a single project or a number of separate projects.

(b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Further, according to CEQA Guidelines Section 15130 (a)(1):

As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in the CEQA Guidelines, Section 15064(h)(4) it should be noted that:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Therefore, the cumulative discussion in an EIR focuses on whether the impacts of the project under review are cumulatively considerable within the context of impacts caused by other past, present, or future projects. The technical analysis in Section C.2 (Cumulative Impact Analysis) includes the discussion of cumulative impacts for transportation VMT associated with the project.

Cumulative Development Scenario

Table C.1-1 lists current development projects within a one-mile radius from the proposed project, with the emphasis on housing projects that would generate additional VMT, similar to the proposed project. The location of these cumulative residential and commercial projects is also depicted on Figure C.1-1.

Table C.1-1. City of Lancaster Cumulative Residential Project List

Tentative Tract Map, Tract No. and Case No.	Project Location	Zone	Number of Lots	Map No.
Tract No. 39910	Southeast corner of Ave L and 57th St W.	R-10,000	6	1
Tract No. 61040	15.1± gr ac SFR subdivision; NW corner of future 55 th St W and future Ave K-14	R-7000	58	2
Tract No. 61989-01	20.25± gr ac SFR subdivision; SW corner of 67 th St W and Ave L	R-10,000	56	3
Avanti North Specific Plan TTM 73507 SP15-01	Avenue K, Avenue K-8, 70 th Street West, 60 th Street West	SP	753	4
Avanti South Specific Plans TTM74312 SP 15-02 GPA 16-01 DA 18-01 ZC 16-01	62nd Street West, 75 th Street West, Avenue K-8, Avenue L	SP 15-02	1,375 single-family homes 325 multi-family units	5
TTM 61678 CUP 20-05	57th Street West and Avenue K	R-7,000	123	6
TTM 72532/ CUP 06-08	Southeast Corner of 60th Street West and Avenue L	CPD	10 commercial parcels and a shopping center	7
TTM 61920	Northeast Corner of future 55th Street West and Avenue K	R-10,000 and R- 15,000	108	8
TTM 61600	East of 60th Street West on the south side of future Avenue K-12	R-7,000	33	9
TTM 83554	Along 60th Street West between Avenue K-9 and Avenue K-11	R-7,000	18	10
TTM 83553	Northwest corner of 52nd Street West and Avenue L	R-7,000	28	11

Source: City of Lancaster, 2021

Cumulative Impact Methodology

Section C, Environmental Impacts Analysis, of this EIR presents the direct and indirect impacts associated with the proposed project, which are limited to transportation VMT impacts. As discussed in Appendix B, all other impacts associated with the proposed project were found to be less than significant or reduced to a level of less than significant with the implementation of mitigation measures. Therefore, the cumulative impact assessment is limited to transportation VMT impacts. The area within which a

cumulative VMT effect can occur is within a one-mile radius from the proposed project site. That is because related VMT effects are typically localized around nearby residential and other uses within the City that are more likely to generate trips and associated VMT. For this reason, the geographic scope for the analysis of cumulative impacts is identified for transportation within Section C.2 (Transportation) as within a one-mile radius from the proposed project site.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of the analysis is based on other residential projects planned within a one-mile radius of the proposed project, as these projects have been identified by the City and would generate similar trip characteristics as the proposed project. While the geographic scope of cumulative VMT effects may extend beyond the scope of the direct effects (a one-mile radius), extending beyond this scope or estimating the indirect VMT effects of the proposed project would be speculative. In addition, each cumulative residential project (as identified in Table C.1-1) will have its own assumptions with respect to population and VMT generated, which may or may not coincide or overlap with the proposed project's effects.

Cumulative impacts may represent a “worst-case” scenario because some of the related projects may not be built or some related projects may be completed prior to the initiation of proposed project. In addition, related projects would be subject to unspecified mitigation measures, which may reduce their potential VMT impacts.

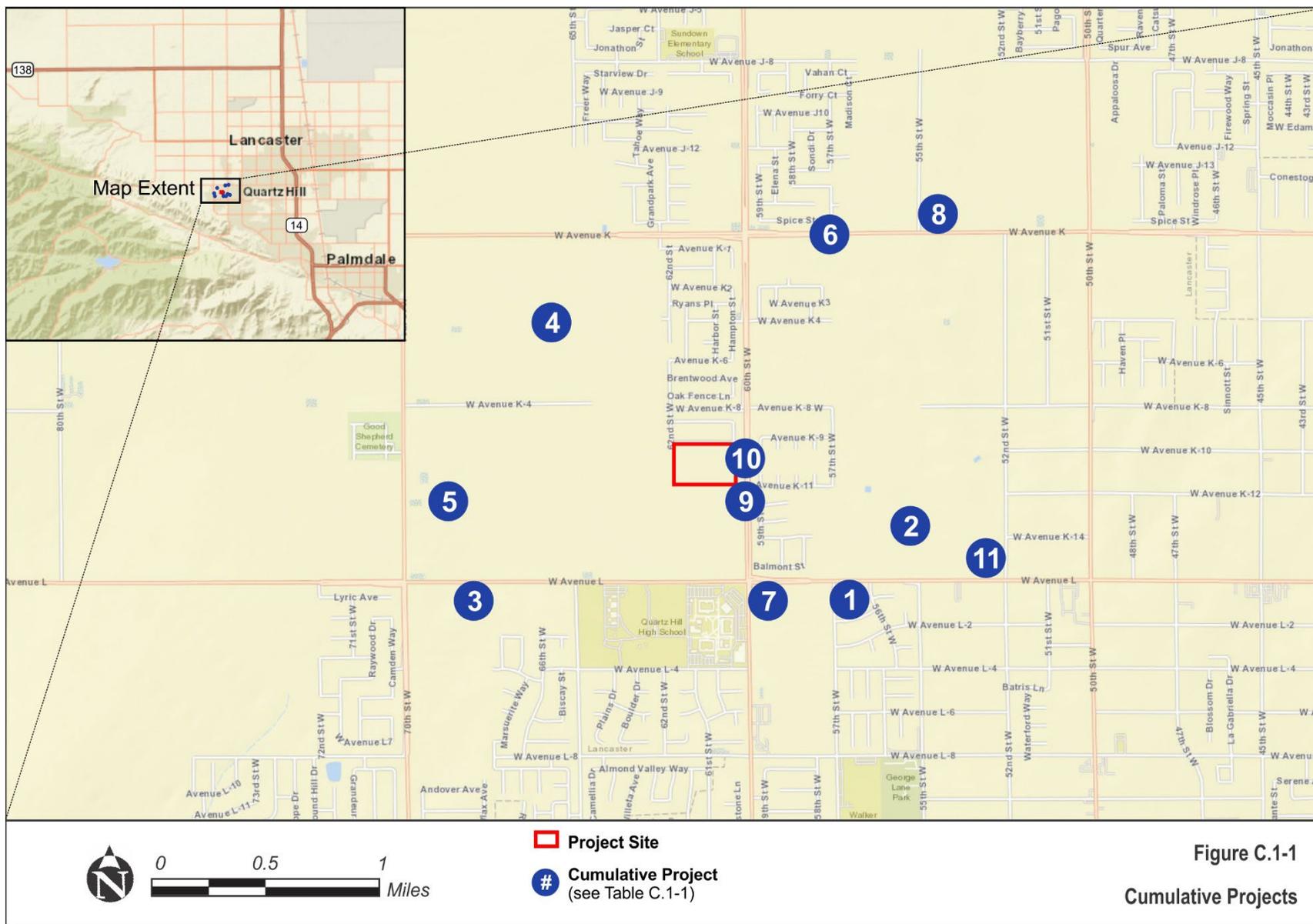
C.1.4 Mitigation Measures

Where potentially significant impacts are identified in this EIR or in the Initial Study (Appendix B), mitigation measures are recommended. Each mitigation measure defines the specific requirements to reduce impacts and defines the relevant milestone (the timeframe within which the measure must be implemented).

C.1.5 Mitigation Monitoring

Public Resources Code Section 21081.6 establishes two distinct requirements for agencies involved in the CEQA process. Subdivisions (a) and (b) of the section relate to mitigation monitoring and reporting, and the obligation to mitigate significant effects where possible. Pursuant to subdivision (a), whenever a public agency completes an EIR and makes a finding pursuant to Section 21081(a) of the Public Resources Code taking responsibility for mitigation identified in the EIR, the agency must adopt a program of monitoring or reporting, which will ensure that mitigation measures are complied with during implementation of the project.

As required by CEQA and depending on the decision on the proposed project, the City would adopt a mitigation and monitoring program to ensure compliance with the recommended mitigation measures identified in this EIR including the measures identified in the Initial Study (Appendix B). The mitigation and monitoring program for the proposed project will be included in the Final EIR consistent with CEQA requirements.



C.2 Transportation

This section describes the surface transportation qualities of the project vicinity and evaluates the significance of impacts related to VMT that may occur as a result of the proposed project. This section only focuses on potential VMT. As provided in Appendix B, the proposed project is found to not result in potential impacts related to adopted policies, plans, or programs supporting the transportation and circulation system, increase hazards due to a geometric design feature, or impact the flow of emergency service vehicles.

This analysis utilizes the findings of the *Lancaster TTM 83232 VMT Analysis Study* prepared by Fehr & Peers (August 20, 2021), which is provided as Appendix C.

C.2.1 Environmental Setting

Commute Characteristics: City of Lancaster

As shown in Figure C.2-1, approximately 75% of Lancaster residents work outside the City, and approximately two-thirds of people who work in Lancaster live outside the City according to data provided by the U.S. Census Bureau (City of Lancaster, 2020). Nearly 15,000 Lancaster residents are employed within the City, accounting for a quarter of Lancaster commuters.

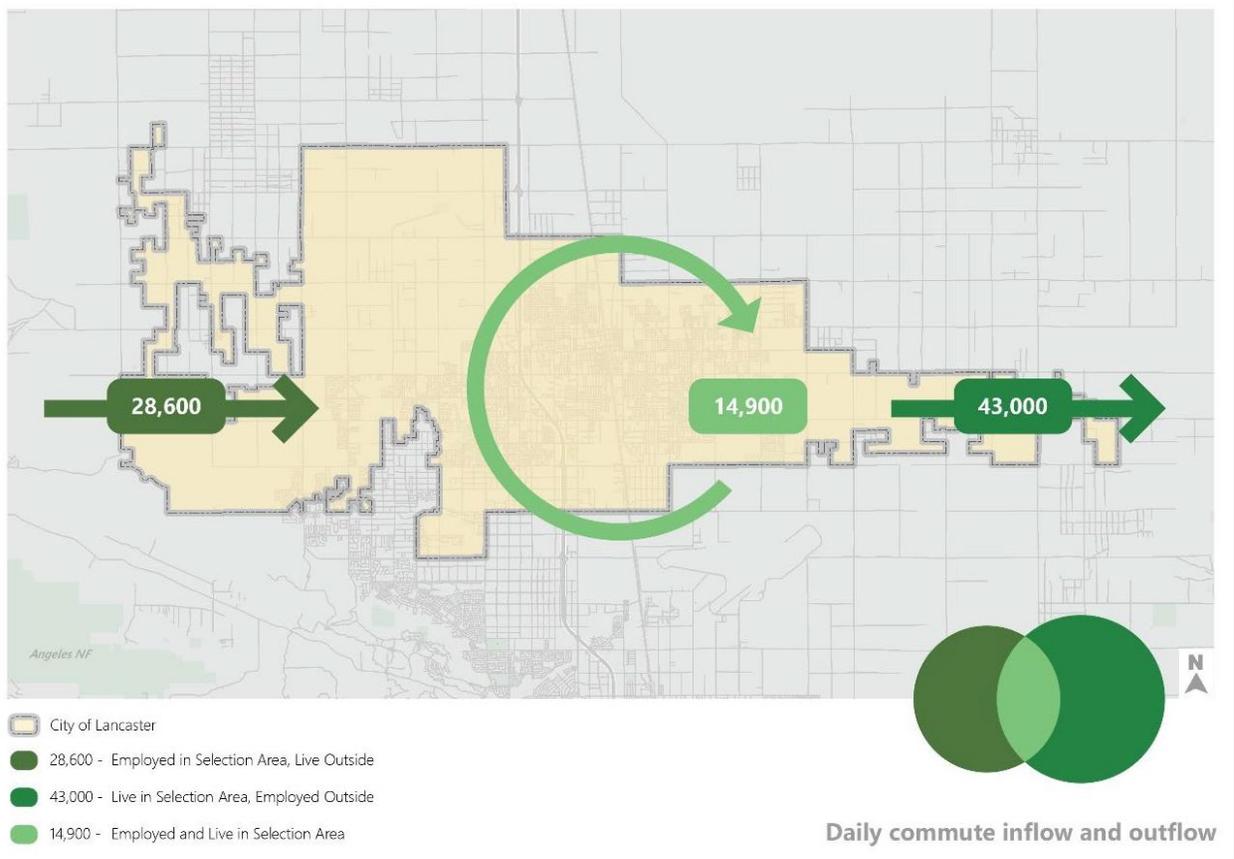


Figure C.2-1. Daily Commute Inflow and Outflow, City of Lancaster

These commute characteristics have implications for the City’s VMT metrics because they affect the distance that commuters need to travel to reach their jobs. As shown in the tables below, people who live in Lancaster typically have a longer commute than people who work in Lancaster; this data suggests that many people who work in Lancaster do not live there but reside close by and therefore travel shorter distances for work, while many people who live in Lancaster do not work in or near the City and therefore travel greater distances for work. Table C.2-1 summarizes commute distance for people who live in Lancaster, whether they work in the City or elsewhere, and Table C.2-2 summarizes commute distance for people who work in Lancaster, whether they live in the City or elsewhere. Nearly 60% of people who live in Lancaster commute 25 miles or more for work, compared to 37% of people who work in Lancaster.

Table C.2-1. Commute Distance for People who Live in the City of Lancaster		
Commute Distance	Count	Share
Total All Jobs	57,958	100%
< 10 Miles	21,490	37.1%
10-24 Miles	2,097	3.6%
25-50 Miles	18,315	31.6%
> 50 Miles	16,056	27.7%

Source: City of Lancaster, 2020

Table C.2-2. Commute Distance for People who Work in the City of Lancaster		
Commute Distance	Count	Share
Total All Jobs	43,539	100%
< 10 Miles	22,560	51.8%
10-24 Miles	4,902	11.3%
25-50 Miles	6,616	15.2%
> 50 Miles	9,461	21.7%

Source: City of Lancaster, 2020

Baseline VMT: City of Lancaster

Table C.2-3 presents VMT estimates for the greater Antelope Valley Planning Area (AVPA) and the City of Lancaster. The AVPA contains the entire Antelope Valley, while the City of Lancaster is the City boundary. As shown, total VMT per capita is greatest in both the AVPA and City of Lancaster (total VMT includes miles travelled from both persons that live in Lancaster and those that work in Lancaster). Home-based VMT represents daily VMT of persons residing within the planning area (AVPA or City of Lancaster) during their daily “errand” trips. Of the three types of VMT shown in Table C.2-3, home-based work VMT per employee is the lowest, which represents average commute distance of people who both live and work inside the AVPA or City of Lancaster boundary.

VMT Metric	Geography	Average VMT
Total VMT Per Capita	AVPA	41.8
	City of Lancaster	36.4
Home-Based VMT Per Capita	AVPA	20.2
	City of Lancaster	14.1
Home-Based Work Commute VMT Per Employee	AVPA	9.4
	City of Lancaster	8.4

Source: City of Lancaster, 2020

C.2.2 Regulatory Setting

State Regulations

Following years of development and public comment, the California Office of Planning and Research (OPR) and the Natural Resources Agency have issued new CEQA Guidelines for analyzing transportation impacts. These new regulations represent a major shift in approach to analyzing transportation impacts under CEQA. Beginning July 1, 2020, all CEQA lead agencies must discontinue analysis of transportation impacts based on congestion effects tied to Level of Service (LOS). Rather, analysis of a project’s transportation impacts must now be based on vehicle miles traveled or VMT. VMT analyzes the distance that vehicles travel to and from a project, rather than congestion levels at intersections and along roadway segments. OPR’s enacted new guidelines for assessing transportation impacts specify that traffic congestion can no longer be considered in assessing impacts under CEQA.

Local Regulations and Plans

In response to Senate Bill (SB) 743, the City of Lancaster adopted new transportation impact thresholds to adhere to CEQA requirements and provided guidance on conducting transportation studies in the City. The City of Lancaster has identified the following goals and policies in its General Plan, which align with the requirements of SB 743 (City of Lancaster, 2020):

- *Plan for Physical Mobility Goal 14 - A well-balanced transportation and circulation system which provides for the efficient and safe transport of goods and people within and through the City of Lancaster; and which balances concerns for mobility with concerns for safety and the quality of the City’s living environment.*
 - *Objective 14.2 – Promote a street system which balances the needs of automobiles with the needs of pedestrians, bicyclists, and transit users while protecting environmental and quality of life issues. Over time, Lancaster’s streets should evolve to respond to the needs of transportation users and the surrounding neighborhood.*
 - *Policy 14.2.1 – Support and improve a street network that is sensitive to environmental issues such as biological, land, and water resources, as well as air quality, while permitting continued development within the study area.*
 - *Objective 14.4 – Reduce reliance of the use of automobiles and increase the average vehicle occupancy by promoting alternatives to single-occupancy auto use, including ridesharing, non-motorized transportation (bicycle, pedestrian), and the use of public transit.*
 - *Policy 14.4.1 – Support and encourage the various public transit companies, ridesharing programs and other incentive programs, that allow residents to utilize modes of transportation other than*

the private automobile, and accommodate those households within the Urbanizing Area of the City that rely on public transit.

- *Policy 14.4.2 – Promote the use of alternative modes of transportation through the development of convenient and attractive facilities that support and accommodate the services.*
- *Policy 14.4.3 – Encourage bicycling as an alternative to automobile travel for the purpose of reducing vehicle miles traveled (VMT), fuel consumption, traffic congestion, and air pollution by providing appropriate facilities for the bicycle riders.*
- *Policy 14.4.4 – Encourage commuters and employers to reduce vehicular trips by implementing Transportation Demand Management strategies.*
- *Policy 14.4.5 – Design transportation facilities to encourage walking, provide connectivity, ADA accessibility, and safety by reducing potential auto/pedestrian conflicts.*

C.2.3 Environmental Impacts and Mitigation Measures

Impact Assessment Methodology

The City’s VMT methodology for land use projects is based on an origin-destination (OD) VMT methodology, which estimates the VMT generated by land uses in a specific geographic area, such as the City or a larger geographic area such as Los Angeles County. All vehicles traveling to/from the defined geographic area are tracked within the Southern California Association of Governments (SCAG) model, and the number of trips and length of trips are used to calculate the OD VMT.

The SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) trip-based model is a travel demand forecasting model with socioeconomic and transportation network inputs, such as population, employment, and the regional and local roadway network, that estimates current travel behavior and forecasts future changes in travel demand. The current SCAG model has 2012 as the base year and 2040 as the forecast year and can be used to estimate VMT for current year 2021 conditions. The 2040 model contains the planned transportation improvements in the RTP and the growth projections in the SCS.

When calculating VMT for a project, the City’s VMT methodology matches the methodology used to establish the Baseline VMT metrics (as summarized in Table C.2-3). For residential projects in the City of Lancaster, VMT is defined as measurement of Home-Based VMT per capita, which reflects all trips that begin or end at a residential unit within the AVPA (Antelope Valley). All home-based auto vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the population within the geographic area to get the efficiency metric of home-based VMT per capita. Following the VMT analysis, the Home-Based VMT per capita of the project is then compared to the AVPA Baseline VMT to determine if it exceeds the City’s impact threshold.

Table C.2-4 presents the population inputs for the proposed project. The project area population was estimated by referring to population per household ratio of Project Transportation Analysis Zone (TAZ) in the SCAG base year model (Fehr & Peers, 2021).

Land Use	Households	Population
Residential (Proposed Project)	86	301

Source: Fehr & Peers, 2021 (Appendix C)

Environmental Impact Analysis

Impact TR-1: The project would generate VMT exceeding the City's thresholds

Class I: Significant and Unavoidable. Based on the City's VMT requirements, all projects must limit the generation of VMT to be 15% or more below the AVPA regional average. A project that does not meet these requirements will have a significant impact. The Home-Based VMT per capita of the project was calculated for existing year (2021) using the SCAG travel demand model. While the project would be built over time, the Year 2021 analysis shows how the VMT generated by the proposed project compares to current travel and VMT characteristics in the overall AVPA planning area. Table C.2-5 presents the Home-Based VMT per capita of the project compared to the AVPA regional average (identified as AVPA Baseline VMT in the table).

VMT Metrics for Housing Project	Home-Based VMT Per Capita
Project VMT Estimate (2021)	21.6
AVPA Baseline VMT (2021)	20.1
THRESHOLD: 15% Below AVPA Baseline	17.1
Project Level over Threshold	+26%
VMT IMPACT?	YES

Source: Fehr & Peers, 2021 (Appendix C)

As shown in Table C.2-5, the proposed project is estimated to generate 21.6 home-based VMT per capita. In comparison to the City's threshold of 15% below Baseline VMT of the AVPA, the proposed project is 26% over the threshold. The higher VMT results is due to the location of the proposed project in the western area of Lancaster with lower development densities that can result in longer travel distance in comparison to the broader Antelope Valley area.

In order to mitigate the project's VMT impacts, Home-Based VMT per capita would need to be reduced by 26%, which equates to a reduction of approximately 1,355 total daily VMT. Current mitigation guidance provided by the California Air Pollution Control Officers Association (CAPCOA) states the maximum possible reduction in VMT is 20% in suburban locations (CAPCOA, 2010). This is because a residential project is only able to decrease VMT under certain methods, primarily being increasing transit use or providing more employment opportunities and land uses to residences. These methods are difficult to achieve in suburban areas compared to dense urban areas. Therefore, the proposed project is unable to mitigate the VMT impact, resulting in a significant and unavoidable impact (Class I).

C.2.4 Cumulative Impact Analysis

Geographic Extent

The area within which a cumulative VMT effect can occur is within a one-mile radius from the proposed project. That is because related VMT effects are typically localized around nearby residential uses within the City that are more likely to generate trips and associated VMT. For this reason, the geographic scope for the analysis of cumulative impacts is identified for transportation within Section C.2, Transportation, as within a one-mile radius from the proposed project.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of the analysis is based on other residential projects planned within a one-mile radius of the proposed project, as these projects have been identified by the City and would generate similar trip characteristics as the proposed project. While the geographic scope of cumulative VMT effects may extend beyond the scope of the direct effects (a one-mile radius), extending beyond this scope or estimating the indirect VMT effects of the proposed project would be speculative. In addition, each cumulative residential project (as

identified in Table C.1-1) will have its own assumptions with respect to population and VMT generated, which may or may not coincide or overlap with the proposed project's effects.

Cumulative Effects of the Proposed Project

The addition of vehicle trips from cumulative projects in conjunction with proposed project trips would increase total VMT in the area. However, while the total amount of VMT in the area might increase from overall population growth, the average VMT per trip is not expected to change significantly. While an increase in population and housing would occur, the overall commute characteristics of the City of Lancaster are not expected to change significantly compared to that described in Section C.2.1. The City of Lancaster General Plan also includes goals and policies to encourage more residents living and working in the City, which would strive to decrease VMT.

Development of cumulative projects within a one-mile radius from the proposed project would generate long-term total VMT increases at much higher levels than the proposed project. For example, the Avanti North Specific Plan proposes 753 lots; and the Avanti South Specific Plans propose 1,375 single-family homes and 325 multi-family units. In comparison, the proposed project includes the construction of 86 single-family homes, which is substantially less (approximately 96 percent less) than the total residential units that are proposed for these nearby developments. Therefore, the contribution of the proposed project toward cumulatively increasing VMT over existing levels would be less than cumulatively considerable (Class III).

C.2.5 Level of Significance After Mitigation

As discussed under the analysis of Impact TR-1 (The project would Generate VMT Exceeding the City's Thresholds), the proposed project is unable to mitigate the VMT impact resulting in a significant and unavoidable impact that cannot be mitigated (Class I). The contribution of the project toward cumulatively increasing VMT over existing levels would be less than cumulatively considerable (Class III).

D. Alternatives

This section describes the alternatives to the proposed project, the alternatives screening process, and the environmental effects of alternatives retained for analysis. The intent of this section is to document (1) the range of alternatives that have been selected and evaluated; (2) the approach used by the City in screening the feasibility of these alternatives according to guidelines established under CEQA; (3) the results of the alternatives screening; and (4) the environmental impacts of each alternative relative to the proposed project.

This section is organized as follows:

- Section D.1 summarizes CEQA requirements related to alternatives;
- Section D.2 describes the process used to define alternatives to the proposed project;
- Section D.3 describes the alternatives retained for analysis, including the No Project Alternative (CEQA Guidelines §15126.6(e)), and presents impact analysis by discipline for each of these alternatives;
- Section D.4 describes the alternatives that were considered, but eliminated from detailed evaluation; and
- Section D.5 presents the comparison of alternatives and identifies the Environmentally Superior Alternative (CEQA Guidelines §15126.6(d)).

D.1 CEQA Requirements for Alternatives

An important aspect of EIR preparation is the identification and assessment of reasonable alternatives that have the potential to avoid or minimize the impacts of a proposed project. The CEQA Guidelines require consideration of the No Project Alternative (Section 15126.6(e)) and selection of a reasonable range of alternatives (Section 15126.6(d)). The EIR must adequately assess these alternatives to allow for a comparative analysis for consideration by decision makers. The CEQA Guidelines (Section 15126.6(a)) state that:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The key applicable provisions of the CEQA Guidelines (Section 15126.6) pertaining to the analysis of alternatives are summarized as follows:

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The “no project” alternative shall be evaluated along with its impact. The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice between the alternatives and the proposed project. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.

- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

D.1.1 Consistency with Project Objectives

The CEQA Guidelines require the consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may “impede to some degree the attainment of project objectives” (Section 15126.6(b)).

Specifically, the project objectives are as follows:

- Make productive use of a vacant property by developing the site with residential uses consistent with the current City of Lancaster zoning designation.
- Increase the available single-family residential housing stock within the City of Lancaster.
- Build an integrated, high-quality development that has a range of single-family home sizes to offer home ownership opportunities attainable to a variety of household types and income levels.
- Expand the utilities and infrastructure necessary to support project site development, while reducing negative impacts to the greater community.

D.1.2 Feasibility

The CEQA Guidelines (Section 15364) define feasibility as:

. . . capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

In addition, the CEQA Guidelines Section 15126.6(f) states that in determining the range of alternatives to be evaluated in the EIR, the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries, and proponent’s control over alternative sites. The feasibility of potential alternatives has been assessed taking the following factors into account:

Legal Feasibility: Does the alternative have the potential to avoid lands that have legal protections that may prohibit or substantially limit the feasibility of permitting the proposed project?

Regulatory Feasibility: Does the alternative have the potential to avoid lands that have regulatory restrictions that may substantially limit the feasibility of, or permitting of, the proposed project?

Technical Feasibility: Is the alternative feasible from a technological perspective, considering available technology? Are there any construction, operational, or maintenance constraints that cannot be overcome?

Environmental Feasibility: Would implementation of the alternative cause substantially greater environmental damage than the proposed project, thereby making the alternative clearly inferior from an environmental standpoint?

This screening analysis does not focus on relative economic factors or costs of the alternatives (as long as they are found to be economically feasible). CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may “impede to

some degree the attainment of project objectives or would be more costly” (CEQA Guidelines Section 15126.6[b]).

D.1.3 Potential to Eliminate Significant Environmental Effects

CEQA requires that to be fully considered in an EIR, an alternative must have the potential to “*avoid or substantially lessen any of the significant effects of the project*” (CEQA Guidelines Section 15126.6(a)). If an alternative was identified that clearly does not provide potential overall environmental advantage as compared to the proposed project, it was eliminated from further consideration unless the City determined that the alternative should be analyzed because it addresses a concern identified during the scoping process. At the screening stage, it is not possible to evaluate all the impacts of the alternatives in comparison to the proposed project with absolute certainty, nor is it possible to quantify impacts. However, it is possible to identify elements of an alternative that are likely to be the sources of impact and to relate them, to the extent possible, to general conditions in the subject area.

This EIR (including Appendix B, Initial Study) concludes that the proposed project’s impacts are reduced to less than significant levels in all impact areas with incorporation of the identified mitigation measures and only VMT transportation impacts remain significant and unavoidable.

D.2 Alternatives Evaluation Process

The range of alternatives considered in this analysis was identified through consideration of:

- Any comments received during the public and agency scoping process, and
- Alternatives identified by the EIR Team as a result of its independent review of the proposed project’s impacts.

Consistent with Section 15126.6(e) of the CEQA Guidelines, the alternatives analysis includes consideration of the No Project Alternative. The analysis of the No Project Alternative must discuss existing conditions as they occurred at the time that a project’s NOP was published, as well as “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Guidelines Section 15126.6 [e][2]). The requirements also specify that “[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed” (CEQA Guidelines Section 15126.6 [e][3][B]).

D.3 Alternatives Retained for Analysis

This section describes and evaluates the alternatives that meet the CEQA criteria defined in Section D.1 and thus have been retained for the EIR’ alternatives analysis. A description of those alternatives that did not meet CEQA’s criteria for further evaluation is provided in Section D.4, with an explanation as to why alternatives were eliminated from further consideration. The “Environmentally Superior Alternative” is addressed in Section D.5. No other alternatives meeting the CEQA criteria defined in Section D.1 have been identified.

In order to comply with CEQA’s requirements, each alternative that has been developed for this analysis has been evaluated in three ways:

- Does the alternative accomplish all or most of the basic objectives of the proposed project?

- Is the alternative potentially feasible (from environmental, legal, technological, and regulatory standpoints)?
- Does the alternative avoid or substantially lessen any significant effects of the proposed project (including consideration of whether the alternative itself could create significant effects potentially greater than those of the proposed project)?

D.3.1 Alternative 1 – No Project Alternative

Description

Under Alternative 1, the proposed project would not be constructed, and the project site would remain undeveloped.

Objectives

Alternative 1 would not meet the project objectives because the site would remain vacant and would not be developed with residential units and supporting utilities and infrastructure. This alternative would not increase the available residential housing stock in the City of Lancaster or offer home ownership opportunities.

Impact Analysis by Discipline

Transportation

The proposed project would not be built under Alternative 1 and would not add vehicle traffic. Therefore, this alternative would not contribute to VMT in the project area.

Conclusion – Alternative 1

The project site would remain undeveloped; therefore, this alternative would not generate any VMT. No transportation impacts would result from this alternative.

D.3.2 Alternative 2 – Reduced Project Alternative

Description

Alternative 2 consists of developing the site with residential homes, identical to the proposed project, but with a decrease in the number of homes. The project site is zoned R-7000, which is “single-family residential, minimum lot size 7,000 sf.” Under the proposed project, this minimum lot size of 7,000 square feet is generally used, allowing for the maximum number of homes to be developed within the site (86 total homes under the current zoning). However, larger lots are permissible within the zone.

Under Alternative 2, the number of houses to be developed within the site would be reduced by increasing the individual lot sizes to 9,000 sf. This would result in 67 homes built under Alternative 2 (a reduction of 19 lots). This reduction ensures the current zoning of R-7,000 would not need to change and would still apply to Alternative 2.

Objectives

The intent of Alternative 2 is to lessen or avoid the significant unavoidable VMT impact associated with the proposed project while meeting the project objectives. Alternative 2 would meet the project objectives

of developing the project site with residential units and supporting utilities and infrastructure. This alternative would also increase the available residential housing stock in the City of Lancaster and offer home ownership opportunities.

Impact Analysis by Discipline

Transportation

Reducing the number of houses built from 86 (proposed project) to 67 (Alternative 1) would reduce VMT generated under this alternative. This is a 22% reduction in the number of homes. Based on the VMT analysis provided in Chapter C.2 (Transportation), a reduction in VMT of 26% would be necessary to avoid a significant unavoidable VMT impact. Therefore, comparing the number of homes and VMT generated between the proposed project and Alternative 2, Alternative 2 would only reduce VMT by 22% and would continue to generate a significant and unavoidable VMT impact. Furthermore, such a linear analysis would not be accurate. Because Alternative 2 would utilize a 9,000-square-foot lot for each home, it should be expected the size of each home would be larger compared to the proposed project. If a larger lot is used, it's likely a larger home would be built. This would increase both the persons per household and VMT generated by each home under Alternative 2. Therefore, it is expected that Alternative 2 would reduce VMT by less than 20% compared to the proposed project. Therefore, because a 26% reduction in VMT is necessary to avoid a significant impact, Alternative 2 would also result in a significant and unavoidable (Class I) VMT impact.

Conclusion – Alternative 2

It is expected that Alternative 2 would reduce VMT by less than 20% compared to the proposed project. Because a 26% reduction in VMT is necessary to avoid a significant impact, Alternative 2 would also result in a significant and unavoidable (Class I) VMT impact. Therefore, while the overall VMT generated by Alternative 2 would be reduced compared to that generated under the proposed project, the impact level would not be reduced.

D.4 Alternatives Considered but Eliminated from Further Consideration

This section describes and evaluates the alternatives that did not meet the CEQA criteria defined in Section D.1. The following list outlines the four types of alternatives that are addressed in this section, with an explanation as to why each alternative was eliminated.

- Alternative Sites
- Reduced Project Not Consistent with Current Zoning

D.4.1 Alternative Sites

No alternative offsite locations have been identified at this time. Even if the project applicant obtained site control of other nearby properties able to support the proposed project, there would be no significant reduction in the VMT impact of the project. Development of the proposed project at a different location would not substantially alter the generated VMT as the project would remain in the City of Lancaster or greater Antelope Valley. Therefore, an offsite alternative would not meet CEQA requirements for alternatives, as described in Section D.3, relative to reducing or avoiding significant impacts of the project. Further, although the applicant does have control over other properties in the City of Lancaster, each of

these properties is being developed with other residential projects and therefore the lands would not be available as an alternative location for the proposed project.

D.4.2 Reduced Project Not Consistent with Current Zoning

The project site is zoned R-7,000 (Single Family Residential, minimum lot size 7,000 square feet). In order to reduce the significant unavoidable VMT impacts associated with the project, it would require reducing VMT by at least 26% (refer to Section C.2, Transportation). In order to achieve this, the entire project site would need to be rezoned to a rural residential zone. In response to the current housing shortage in California, Governor Gavin Newsom signed Senate Bill 9 in September 2021. This bill facilitates the process for landowners to build a duplex or split their current residential lot to create more housing. In practice, the bill requires cities to approve up to four housing units on what was a single-family lot. SB 9 also approves splitting single-family lots so they could be sold separately. Therefore, in theory, the City of Lancaster could not change the zoning to increase the lot sizing in an effort to reduce the number of homes built (and subsequently reduce the expected VMT of the project). For those reasons, such an alternative would not meet CEQA requirements for alternatives, as described in Section D.3, relative to reducing or avoiding significant impacts of the project and being potentially feasible from a regulatory standpoint.

D.5 Comparison of Alternatives

Section D.3 describes and evaluates the two alternatives to the proposed project. Table D-1 presents a comparison of the potential significant impacts of the proposed project in comparison with the alternatives.

CEQA Guidelines Section 15126.6(d) requires the following for alternatives analysis and comparison:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (CEQA Guidelines Section 15126.6[d])

If the environmentally superior alternative is the No Project Alternative, CEQA requires the identification of an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]). Based on the analysis provided in this EIR, the environmentally superior alternative is the proposed project.

Table D-1. Comparison of Alternatives			
Environmental Resource	Impact Severity Compared to Proposed Project		
	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Alternative
Transportation (VMT)	Significant and unavoidable (Class I)	No VMT impact	Reduced overall VMT but remains significant and unavoidable (Class I)

E. Other CEQA Considerations

This section presents several topics required by CEQA, including environmental effects found not to be significant (E.1), growth-inducing effects (E.2), significant irreversible environmental changes (E.3), significant effects that cannot be avoided (E.4), and energy conservation (E.5).

E.1 Environmental Effects Found not to be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR. These are the environmental effects found not to be significant based on the site or project characteristics, and as documented in the Initial Study (see Appendix B). The Initial Study includes the impacts that are not anticipated to occur, the issue area, and the justification. As discussed in the Initial Study, all impacts were found to be less than significant with the exception of transportation impacts related to vehicle miles travelled (which are discussed in Section C.2, Transportation).

E.2 Growth-Inducing Effects

Section 15126.2(d) of the State CEQA Guidelines provides the following guidance on growth-inducing impacts: a project is identified as growth inducing if it “could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Potential growth inducing components of the proposed project addressed in this section relate to temporary employment during construction and population growth from the new housing provided.

E.2.1 Employment and Population Growth

Temporary Construction Workforce. The proposed new buried utilities and new/extended roads would be built first. This work is expected to require less than 20 construction workers on any given work day. Once that infrastructure is complete, multiple homes would be built simultaneously per phase. It is expected that 10 to 15 homes would be constructed per phase, with the estimated timeframe for constructing each home being 6 months. It is expected each home would include a workforce of up to 10 persons on any give work day, with a maximum construction workforce of 150 workers per day over each 6-month home building phase.

All construction workers are expected to be hired from within the City of Lancaster, City of Palmdale, and the Antelope Valley to the extent practicable. Some of the workers originating outside this local area may temporarily relocate to accommodations within the City of Lancaster for the duration of construction activities. Demand for temporary accommodations during construction is expected to be low and would be accommodated by existing lodging facilities in the region. There would not be permanent population growth from such temporary construction work and no expected indirect population growth from construction materials, restaurants, convenience stores, and/or other services that would serve the workers during project construction, as existing facilities in the region would be adequate to accommodate the construction workforce.

The City of Lancaster alone has a construction labor force of 3,716 workers (U.S. Census, 2021). A maximum of 150 workers hired from within the City would represent approximately 4 percent of the total construction labor force, although the construction workers are also expected to come from the surrounding areas as well. As a temporary component, the construction phase would not trigger additional population growth in the area.

Population Increase from New Housing. The proposed project includes the construction of 86 new single-family homes. As provided in Table C.2-4 (Transportation), this is estimated to result in a population increase of 301 persons. Between 2010 and 2020, the population of Lancaster grew approximately 3.2 percent, from 156,633 to 161,699 residents (City of Lancaster, 2021). The Southern California Association of Governments (SCAG) growth forecast predicts a steady increase in population through 2045. From 2020 to 2045, SCAG estimates that the Lancaster's population will grow by nearly 32 percent (City of Lancaster, 2021). The project contribution of 301 persons, should they all come from outside the City of Lancaster and result in direct in migration, would account for a nominal amount of the expected population growth of the City. Furthermore, substantial population growth is forecasted for the City of Lancaster through the year 2045. Therefore, the proposed project would not result in a substantial population increase that is outside of predicted growth and regional estimates within the City's General Plan. Implementation of the proposed project is therefore not considered growth inducing, but instead growth accommodating.

E.3 Significant Irreversible Environmental Changes

Section 15126.2(c) of the State CEQA Guidelines defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the project. Irrecoverable commitments of resources should be evaluated to assure that such consumption is justified.

Construction of the proposed project would commit nonrenewable resources during construction. This includes use of fossil fuels, construction materials, and new equipment that cannot be recycled at the end of each home's useful lifetime, and energy required for the production of materials. During project operation, oil, gas, and other nonrenewable resources would be consumed. Therefore, an irreversible commitment of relatively small amounts of nonrenewable resources would occur as a result of long-term project operation.

Construction and operation of the proposed project would require the use of a limited amount of hazardous materials such as fuel, lubricants and cleaning solvents. During construction all hazardous materials would be stored, handled, and used in accordance with applicable federal, State, and local regulations. The applicant would be required to comply with all applicable regulations and building permit/code requirements during construction, as well as City policies and the mitigation measures identified in Appendix B of this EIR would ensure that all natural resources are conserved to the maximum extent possible. The proposed project is not expected to result in environmental accidents that would cause irreversible damage.

Irreversible impacts can also result from permanent loss of habitat, damage caused by environmental accidents associated with project construction, or operational resource use. However, as discussed in Appendix B (Initial Study), the proposed project would have no impact to biological habitat or communities.

E.4 Significant Effects that Can Not be Avoided

E.4.1 Significant Direct Effects of the Proposed Project

Section 15126.2(b) of the State CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. Potential environmental effects of the proposed project and mitigation measures are discussed in detail in Section C of this EIR. As discussed in Section C.2 (Transportation), there would be a significant and unavoidable vehicle miles travelled (VMT) impact associated with the proposed project. As discussed in Appendix B (Initial Study), all other project impacts would be mitigated to less than significant levels.

E.4.2 Significant Cumulative Effects

According to Section 15355 of the State CEQA Guidelines, the term “*cumulative impacts*” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” Individual effects that may contribute to a cumulative impact may be from a single project or a number of separate projects. Individually, the impacts of a project may be relatively minor, but when considered along with impacts of other closely related or nearby projects, including newly proposed projects, the effects could be cumulatively considerable.

This EIR has considered the potential cumulative effects of the proposed project in Section C. Impacts of the proposed project, when combined with impacts from past, present, and probable future projects would be considered cumulatively significant for the following issue areas:

■ Transportation

The proposed project would contribute to a cumulatively considerable impact to VMT when combined with impacts from past, present, and reasonable future projects. As discussed in Section C.2, the geographic extent for the cumulative transportation VMT analysis includes projects within the City of Lancaster. The addition of vehicle trips from cumulative projects in conjunction with proposed project trips would increase total VMT in the area. While an increase in population and housing would occur, the overall commute characteristics of the City of Lancaster are not expected to change significant compared to that described in Section C.2.1. However, because cumulative development would generate long-term total VMT increases in the City of Lancaster, the contribution of the project toward cumulatively increasing VMT over existing levels would be significant and unavoidable (Class I).

E.5 Energy Conservation

In order to assure that energy implications are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)). According to Appendix F of the State CEQA Guidelines, the goal of conserving energy implies the wise and efficient use of energy including: (1) decreasing overall per capita energy consumption; (2) decreasing reliance on natural gas and oil; and (3) increasing reliance on renewable energy sources.

While state building code standards contain mandatory energy efficiency requirements for new development, the City and utility providers are also important resources to encourage and facilitate energy conservation and to help residents minimize energy-related expenses.

Lancaster is serviced by Southern California Edison (SCE) to deliver electricity to residents and businesses, while the City, through the Community Choice Aggregator Lancaster Choice Energy (LCE), is responsible for purchasing the energy that flows throughout the community. Lancaster has implemented zoning regulations that require the generation of solar energy from new residential development, at a minimum average of one kilowatt per house. The City also encourages ride share opportunities to reduce energy consumption.

Southern California Edison (SCE) offers a variety of energy conservation services as part of its Energy Savings Assistance Fund. The energy assistance fund helps those who qualify by income manage their electricity bills. This program primarily benefits low-income households, seniors, disabled, and non-English speaking residents. Another program, the Residential Multifamily Energy Efficiency Rebate Program, provides incentives for property owners to create energy efficient improvements through lighting, HVAC, and insulation. SCE also offers a number of rebate programs, making energy efficient kits available to residents at no cost.

The City has been proactive in promoting solar power alternatives, conservation, and smart energy. LCE is solely in the business of power generation and searches for the best deals on both conventional and renewable energy resources for Lancaster residents. Customers have three options from which they can choose: Clear Choice, Smart Choice, and Personal Choice. Clear Choice provides 35 percent renewable energy, Smart Choice provide 100 percent renewable and Personal Choice is offered for Net Energy Metering customers who sell their excess power generated back to LCE.

No increases in inefficiencies or unnecessary energy consumption are expected to occur as a direct or indirect consequence of the proposed project.

F. References

- CAPCOA (California Air Pollution Control Officers Association). 2010. Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Access Emission Reductions from Greenhouse Gas Mitigation Measures. [online]: <http://www.capcoa.org/wp-content/uploads/downloads/2010/09/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- City of Lancaster. 2020. Transportation Analysis Updates in Lancaster. [online]: <https://www.cityoflanasterca.org/Home/ShowDocument?id=41936>. Accessed September 2021.
- _____. 2021. 2021-2029 Draft General Plan Housing Element. [online]: <https://www.cityoflanasterca.org/home/showpublisheddocument/43240/637623035590670000>. Accessed October 18.
- Fehr & Peers. 2021. Lancaster TTM 83232 VMT Analysis Study. August 20, 2021.
- U.S. Census. 2021. ACS 2019 5-Year Projections for City of Lancaster, Industry By Sex For Full-Time, Year-Round, Civilian Employed Population 16 Years And Over. [online]: <https://data.census.gov/cedsci/>. Accessed October 18.

G. Preparers of the EIR

A consultant team headed by Aspen Environmental Group prepared this document under the direction of the City of Lancaster (City). Jocelyn Swain (Senior Planner), Cynthia Campana (Senior Planner) and other City departments and representatives provided comment and input into the EIR. Kris Pinero of Royal Investors Group provided project description information to support the analysis presented in this document. The consultant team is listed below.

Consultant Team

Personnel	Education	Role/Issue Area
Aspen Environmental Group		
Sandra Alarcón-Lopez	MA, Urban Planning BA, Speech and Hearing Science	Project Manager
Scott Debauche, CEP	BS, Urban Planning and Design	Transportation
Jeanne Ogar	Master of Environmental Science and Management BA, French	Senior Environmental Planner
Kati Simpson	BA, Geography AA, Liberal Arts and Sciences	Graphics; Document Production

Appendix A

NOTICE OF PREPARATION AND SCOPING COMMENT LETTERS



**NOTICE OF PREPARATION
TENTATIVE TRACT MAP 83232**

DATE: AUGUST 31, 2021

TO: STATE CLEARINGHOUSE AND INTERESTED PARTIES

FROM: CITY OF LANCASTER DEVELOPMENT SERVICES DEPARTMENT
COMMUNITY DEVELOPMENT DIVISION 

SUBJECT: NOTICE OF PREPARATION (NOP) OF A DRAFT FOCUSED ENVIRONMENTAL IMPACT REPORT (EIR) FOR TENTATIVE TRACT MAP (TTM) 83232

The City of Lancaster is the Lead Agency in charge of environmental review for the TTM 83232 as proposed by the applicant. The City has determined that a project level, Focused Environmental Impact Report (EIR) will be prepared. The City is soliciting comments from reviewing agencies and the public regarding the scope and content of the environmental document. For reviewing agencies, the City requests comments with respect to your agency's statutory responsibility as related to the proposed project in accordance with California Code of Regulations, Title 14, Section 15082(b). Your agency may need to use the EIR when considering relevant permits or other approvals for the project. The City is also seeking the views of residents, property owners, and concerned citizens regarding issues that should be addressed in the Focused EIR.

Comment Period: Comments may be sent anytime during the 30-day NOP comment period. The NOP review and comment period begins on August 31, 2021 and ends on September 30, 2021. All comments must be received during the comment period and no later than 6 p.m. on September 30, 2021. Please include any contact name for your agency, if applicable. All comments should be directed to:

City of Lancaster
Attn: Cynthia Campana, Senior Planner
44933 Fern Avenue
Lancaster, CA 93534

Comments may also be emailed to ccampana@cityoflanasterca.org

Project Location/Address: The project site is an approximately 20-acre, undeveloped parcel located at the northwest corner of 60th Street West and Avenue K-12 within the City of Lancaster

(See Figure 1, Project Site and Location). Specifically, the project site is located on Assessor's Parcel Number (APN) 3204-008-048.

Project Description: The proposed project consists of the subdivision of the subject property into 86 single-family residential lots in the R-7,000 (single family residential, 7,000 square foot minimum lot size) zone. Single family residences would be constructed on each of these lots. A site plan for the project is included as Figure 2. The project also includes construction of the following roads to provide vehicle access to the new homes:

- Extending 62nd Street West and Hampton Street to the south.
- Constructing new Street "L," Street "M," Street "N," and a new Avenue K-12 cul-de-sac.

In addition, the project will extend existing water and sewer lines that are available immediately north of the site. These new utility lines will be buried underneath the new roadway segments.

AREAS OF POTENTIAL IMPACT

The City has determined that a Focused EIR is required for this project based on the City's requirements for Vehicle Miles Traveled (VMT) standards and anticipates that the EIR will address the following resource area:

- Transportation

All other environmental topics are expected to result in a less than significant impact or less than significant impact with mitigation, which will be documented in the EIR. The EIR will discuss all other potentially significant effects of the project and will document the reasons for concluding that other effects will be less than significant.

Enclosures:

- Figure 1. Project Site and Location
- Figure 2. Site Plan

Figure 1. Project Site and Location

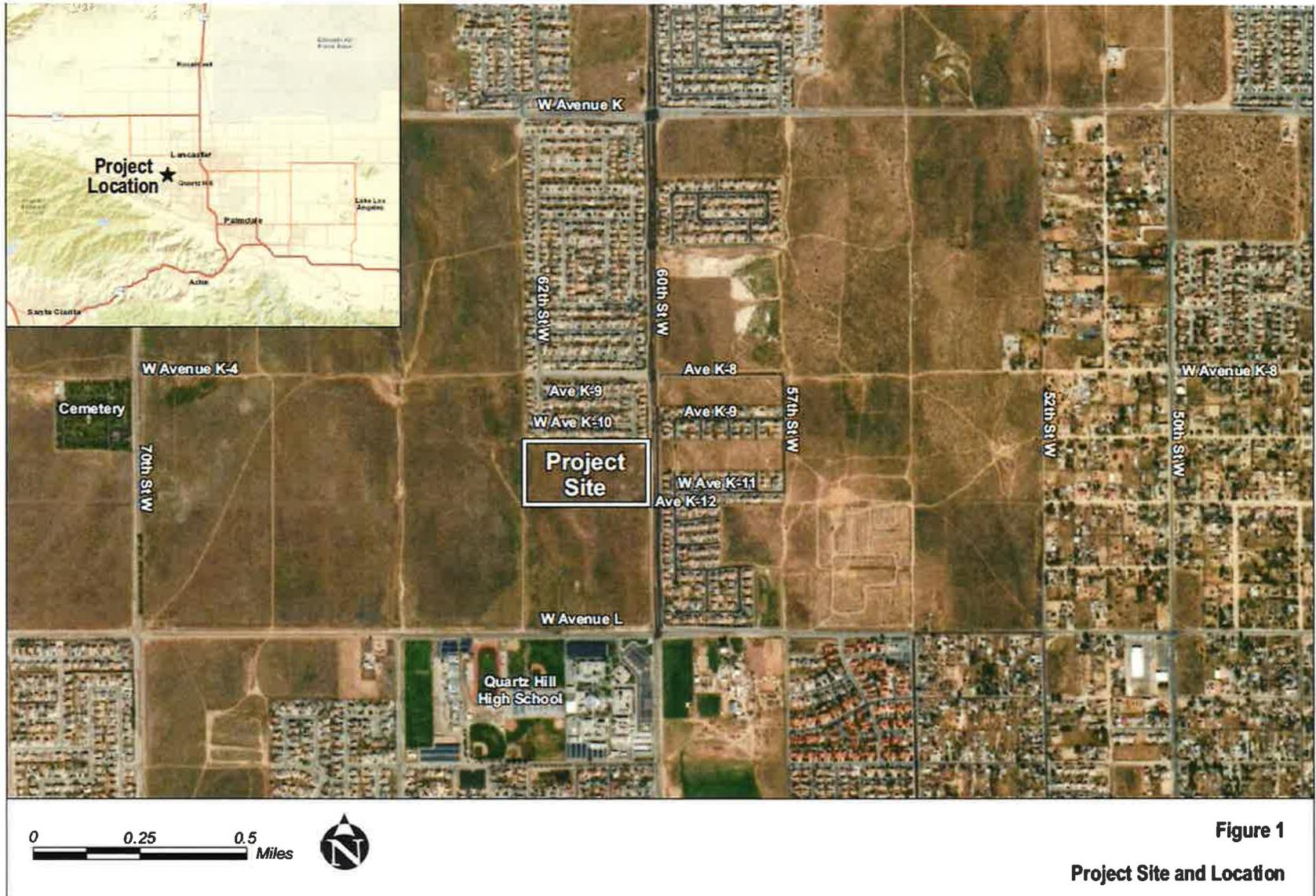


Figure 1
Project Site and Location

Figure 2. Site Plan

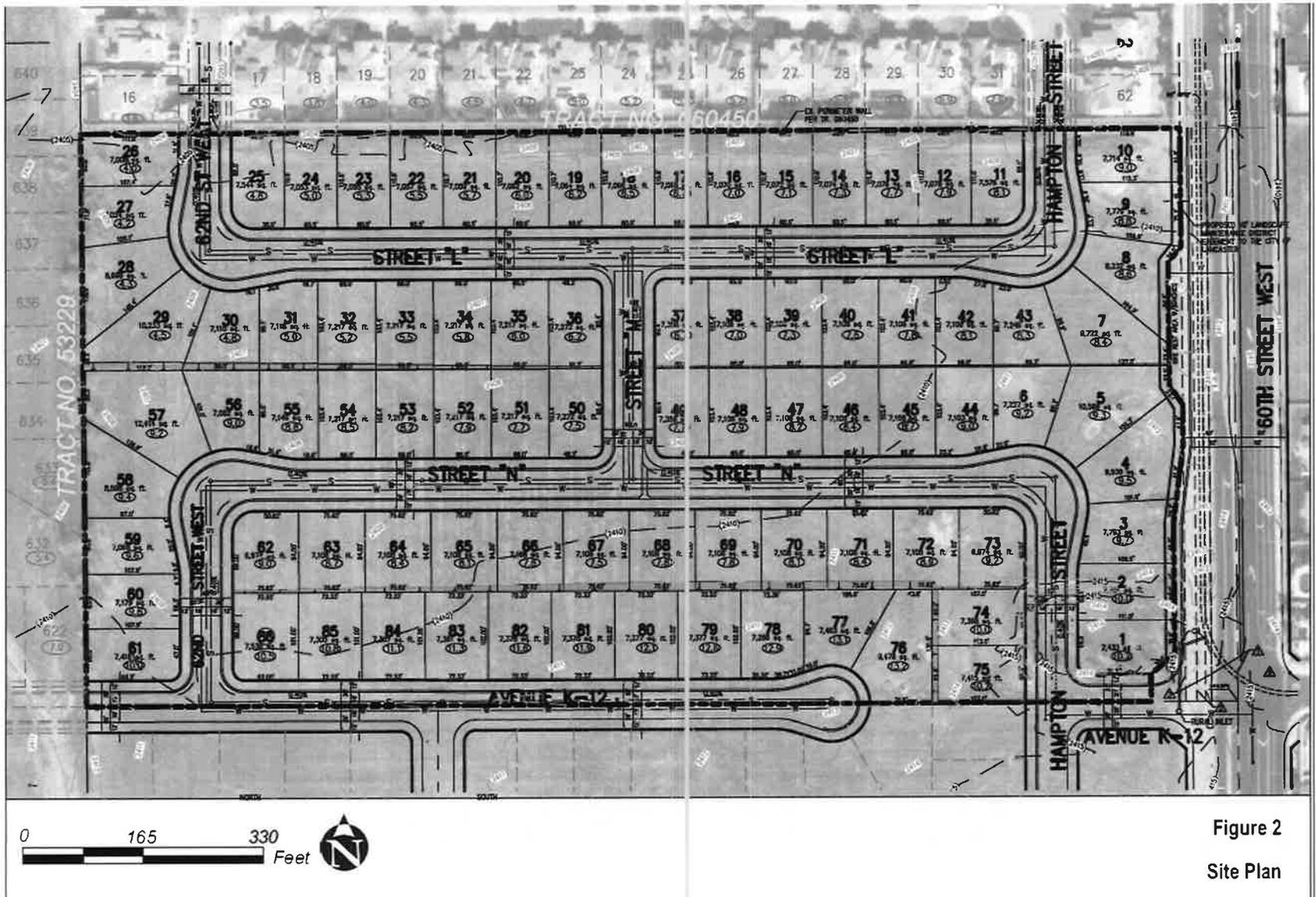


Figure 2
Site Plan

AFFIDAVIT OF PUBLICATION

(2015.5 C.C.P.)

The space above for file stamp only

STATE OF CALIFORNIA }
County of Los Angeles } SS

NOTICE OF PREPARATION TENTATIVE TRACT MAP 83232

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the **Antelope Valley Press**, a newspaper of general circulation, printed and published **daily** in the city of **Palmdale**, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under date of October 24, 1931, Case Number 328601; Modified Case Number 657770 April 11, 1956; also operating as the Ledger-Gazette, adjudicated a legal newspaper June 15, 1927, by Superior Court decree No. 224545; also operating as the Desert Mailer News, formerly known as the South Antelope Valley Foothill News, adjudicated a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California on May 29, 1967, Case Number NOC564 and adjudicated a newspaper of general circulation for the **City of Lancaster**, State of California on January 26, 1990, Case Number NOC10714, Modified October 22, 1990; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

August 31, 2021

I certify (or declare) under penalty of perjury that the fore-going is true and correct.



Signature

Dated August 31, 2021
Executed at Palmdale, California



37404 SIERRA HWY., PALMDALE CA 93550
Telephone (661)267-4112/Fax (661)947-4870

NOTICE OF PREPARATION TENTATIVE TRACT MAP 83232

DATE: AUGUST 31, 2021
TO: STATE CLEARINGHOUSE AND INTERESTED PARTIES
FROM: CITY OF LANCASTER DEVELOPMENT SERVICES DEPARTMENT
COMMUNITY DEVELOPMENT DIVISION
SUBJECT: NOTICE OF PREPARATION (NOP) OF A DRAFT FOCUSED ENVIRONMENTAL IMPACT REPORT (EIR) FOR TENTATIVE TRACT MAP (TTM) 83232

The City of Lancaster is the Lead Agency in charge of environmental review for the TTM 83232 as proposed by the applicant. The City has determined that a project level, Focused Environmental Impact Report (EIR) will be prepared. The City is soliciting comments from reviewing agencies and the public regarding the scope and content of the environmental document. For reviewing agencies, the City requests comments with respect to your agency's statutory responsibility as related to the proposed project in accordance with California Code of Regulations, Title 14, Section 15082(b). Your agency may need to use the EIR when considering relevant permits or other approvals for the project. The City is also seeking the views of residents, property owners, and concerned citizens regarding issues that should be addressed in the Focused EIR.

Comment Period: Comments may be sent anytime during the 30-day NOP comment period. The NOP review and comment period begins on August 31, 2021 and ends on September 30, 2021. All comments must be received during the comment period and no later than 6 p.m. on September 30, 2021. Please include any contact name for your agency, if applicable. All comments should be directed to:
City of Lancaster

Attn: Cynthia Campana, Senior Planner
44933 Fern Avenue
Lancaster, CA 93534

Comments may also be emailed to ccampana@cityoflanasterca.org

Project Location/Address: The project site is an approximately 20-acre, undeveloped parcel located at the northwest corner of 60th Street West and Avenue K-12 within the City of Lancaster (See Figure 1, Project Site and Location). Specifically, the project site is located on Assessor's Parcel Number (APN) 3204-008-048.

Project Description: The proposed project consists of the subdivision of the subject property into 86 single-family residential lots in the R-7,000 (single family residential, 7,000 square foot minimum lot size) zone. Single family residences would be constructed on each of these lots. A site plan for the project is included as Figure 2. The project also includes construction of the following roads to provide vehicle access to the new homes:

- Extending 62nd Street West and Hampton Street to the south.
- Constructing new Street "L," Street "M," Street "N," and a new Avenue K-12 cul-de-sac.

In addition, the project will extend existing water and sewer lines that are available immediately north of the site. These new utility lines will be buried underneath the new roadway segments.

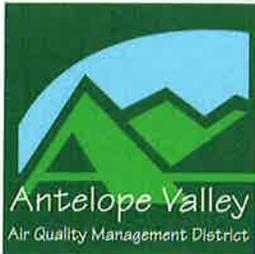
AREAS OF POTENTIAL IMPACT

The City has determined that a Focused EIR is required for this project based on the City's requirements for Vehicle Miles Traveled (VMT) standards and anticipates that the EIR will address the following resource area:

- Transportation

All other environmental topics are expected to result in a less than significant impact or less than significant impact with mitigation, which will be documented in the EIR. The EIR will discuss all other potentially significant effects of the project and will document the reasons for concluding that other effects will be less than significant.

Publish: Aug. 31, 2021



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070

In reply, please refer to AV0921/141

September 14, 2021

Cynthia Campana
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

RE: NOP Tentative Tract Map 83232

Ms. Swain,

The Antelope Valley Air Quality Management District (District) has received the request for comment on the NOP Tentative Tract Map 83232. The project site is approximately 20 acres located at the northwest corner of 60th Street West and Avenue K-12 (APN: 3204-008-048).

Prior to initiating any construction activity, the District requires that the proposed project comply with all requirements outlined in District Rule 403, Fugitive Dust, including submission and approval of a Dust Control Plan and installation of signage. During the construction phase, all disturbed areas should be stabilized so that no visible fugitive dust leaves the property line and does not impact traffic or neighboring residents. Upon completion of the project, all disturbed surface areas must meet the definition of a stabilized surface, as defined in Rule 403.

The District recommends that applicable permit application(s) and fees be submitted for any equipment or process that may have the potential to emit or control air contaminants as a condition of approval.

All construction equipment utilized on this project must comply with Air Resources Board In-Use Off-Road Diesel Vehicle Regulation.

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 23 or bbanks@avaqmd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Lods", is written over a white background.

Barbara Lods
Operations Manager

BJL/BSB ✓



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201

www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 30, 2021

Cynthia Campaña
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534
CCampana@cityoflanasterca.org

Subject: Notice of Preparation of an Environmental Impact Report for the Tentative Tract Map No. 83232 Project, SCH #2021090009, City of Lancaster, Los Angeles County

Dear Ms. Campaña:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) from the City of Lancaster (City; Lead Agency) for the Tentative Tract Map No. 83232 Project (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 & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. 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 (Pub. 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 & G. 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 & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Conserving California's Wildlife Since 1870

Cynthia Campaña
City of Lancaster
September 30, 2021
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Project Description and Summary

Objective: The Project proposes to develop an approximately 20-acre undeveloped parcel. The Project would consist of a subdivision of 86 single-family residential lots in the R-7,000 zone (single family residential, 7,000 square foot minimum lot size). The Project also includes extending 62nd Street West and Hampton Street to the south and constructing new Street “L”, Street “M”, Street “N” and a new Avenue K-12 cul-de-sac. The Project would also include extension of existing water and sewer lines that are available immediately north of the Project site. These new utility lines would be buried underneath the new roadway segments.

Location: The Project is located at the northwest corner of 60th Street West and Avenue K-12 on Assessor’s Parcel Number 3204-008-048.

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. The EIR should provide adequate and complete disclosure of the Project’s potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the EIR when it is available.

Specific Comments

1. Western Joshua Tree (*Yucca brevifolia*). The NOP does not include information on the presence/absence of western Joshua trees on the Project site. The Project could impact western Joshua trees if they occur on site. The western Joshua tree and Joshua tree woodland (*Y. brevifolia* Woodland) is a species and plant community, respectively, that occurs in the City of Lancaster.
 - a) Protection Status: The western Joshua tree is a species designated as candidate for listing as threatened pursuant to CESA (Fish & G. Code, § 2050 *et seq.*). The western Joshua tree is granted full protection of a threatened species under CESA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). As to CEQA, potential impacts on western Joshua trees should be analyzed, disclosed, and mitigated in the Project’s EIR. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA.
 - b) Survey and Analysis: In preparation of the EIR, CDFW recommends the City retain a qualified biologist to perform a western Joshua tree survey. The survey should identify any western Joshua trees and plant communities supporting western Joshua trees that may occur in the following areas: within the Project site; in undeveloped areas within 300 feet of the Project site; and in all areas subject to Project-related ground-disturbing activities (e.g., road construction, utility lines).
 - c) Disclosure: If the Project will impact western Joshua trees, the EIR should fully disclose those impacts on individual western Joshua trees and seedbank. Take of western Joshua tree is defined as any activity that results in the removal of a western Joshua tree, or any part thereof, or impacts the seedbank surrounding one or more western

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- Joshua trees (CDFW 2021a). The EIR should describe what Project-related activities would cause those impacts, where impacts would occur, and when impacts would occur (e.g., site preparation, construction, Project site maintenance).
- d) Avoidance and Minimization: If the Project will impact western Joshua trees, the EIR should provide measures to fully avoid impacts on this candidate species and its seedbank. CDFW recommends a minimum no-disturbance buffer of 300 feet around individual western Joshua trees to fully avoid impacts on the tree and seedbank.
 - e) Mitigation: If take or adverse impacts to western Joshua trees cannot be avoided during Project activities or over the life of the Project, the EIR should provide measures to mitigate for those impacts. Appropriate mitigation may include obtaining appropriate take authorization under CESA prior to implementing the Project (pursuant to Fish & Game Code, § 2080 *et seq.*). Appropriate authorization may include an Incidental Take Permit (ITP) among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Additionally, CDFW recommends the City provide compensatory mitigation for loss of individuals trees and seedbank. CDFW recommends the City identify an appropriate site to preserve western Joshua trees in perpetuity (also see General Comments #8 and #9).
 - f) CESA: To obtain appropriate take authorization under CESA, early consultation with CDFW 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.
2. Foraging Habitat for Swainson's Hawk (*Buteo swainsoni*). Swainson's hawk nest and forage in agricultural and undeveloped lands throughout the Antelope Valley. According to the California Natural Diversity Database (CNDDDB), there is a record of Swainson's hawk occurring within five miles of the Project site (CDFW 2021b). Given the recent Swainson's hawk observation near the Project site and the Project site's suitability to support Swainson's hawk foraging habitat (i.e., a former agricultural field), the Project could impact Swainson's hawk through loss of 20 acres of foraging habitat.
- a) Protection Status: The Swainson's hawk is a CESA-listed threatened species. Potential impacts on Swainson's hawk, either directly or through habitat loss and/or modification, should be analyzed, disclosed, and mitigated in the Project's EIR. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA.
 - b) Survey and Analysis: In preparation of the EIR, CDFW recommends the City retain a qualified raptor biologist with Swainson's hawk survey experience to assess the Project site for possible Swainson's hawk foraging habitat and suitable nest sites within five miles of the Project site. CDFW recommends the City perform a Swainson's hawk survey following the 2010 guidance on [Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California](#) (CDFW 2010). A qualified raptor biologist should conduct surveys in a manner that maximizes the potential to observe the adult Swainson's hawks and nests/chicks via visual and audible cues within a five-mile radius of the Project site. All potential nest trees within a five-mile radius should be

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- surveyed for presence of nests.
- c) Disclosure: If the Project will impact Swainson's hawk, the EIR should fully disclose those impacts on nests and/or foraging habitat. Also, CDFW recommends the EIR provide a discussion of the Project's potential contribution to the ongoing loss of foraging habitat in the Antelope Valley (i.e., cumulative impacts, see General Comment #5).
 - d) Avoidance and Minimization: If the Project will impact Swainson's hawk nests, the EIR should provide measures to fully avoid impacts on nests.
 - e) Mitigation: If the Project would result in loss of foraging habitat, CDFW recommends the EIR provide measures to mitigate for those impacts. Appropriate mitigation may include consulting with CDFW and obtaining appropriate take authorization under CESA prior to implementing the Project (pursuant to Fish & Game Code, § 2080 *et seq.*). Also, CDFW recommends providing compensatory mitigation for permanent loss foraging habitat. The proposed compensatory mitigation should ensure no net loss of foraging habitat for Swainson's hawk.
3. Mohave Ground Squirrel. The Mohave ground squirrel (*Xerospermophilus mohavensis*) is a CESA-listed species. Mohave ground squirrels have been documented historically to occur within the Antelope Valley region. The Project site could support requisite habitat elements for Mohave ground squirrel, which requires burrows under vegetation found in desert scrub, alkali desert scrub, Joshua tree, and annual grasslands.
- a) Survey and Analysis: CDFW recommends the EIR provide a detailed discussion of habitat suitability for Mohave ground squirrel within the Project site and in all areas subject to Project-related ground-disturbing activities (e.g., road construction, utility lines). If the Project provides suitable habitat for Mohave ground squirrel, CDFW recommends the City retain a qualified biologist to conduct protocol level surveys for Mohave ground squirrel to determine presence/absence of this CESA-listed species. The EIR should provide results from a survey for Mohave ground squirrels adhering to survey methods described in California Department of Fish and Game's January 2003 [Mohave Ground Squirrel Survey Guidelines](#) (CDFG 2003).
 - b) Disclosure: The EIR should provide full disclosure of the presence/absence of Mohave ground squirrels so CDFW may assist the City during the public comment period in identifying and mitigating for potential impacts on Mohave ground squirrel.
 - c) Avoidance, Minimization, and Mitigation: If Mohave ground squirrel is present, the Project EIR should be conditioned to avoid, minimize, and mitigate for potential impacts to Mohave ground squirrel and habitat. Appropriate mitigation may include consulting with CDFW and obtaining appropriate take authorization under CESA prior to implementing the Project (pursuant to Fish & Game Code, § 2080 *et seq.*). Also, CDFW recommends providing compensatory mitigation for permanent loss habitat. The proposed compensatory mitigation should ensure no net loss of habitat for Mohave ground squirrels.
4. Desert Tortoise (*Gopherus agassizii*). The desert tortoise is a federal Endangered Species Act (ESA) and CESA-listed species. The Project site is within the known range of the desert tortoise (USFWS 2019).
- a) Survey and Analysis: CDFW recommends the EIR provide a detailed discussion of habitat suitability for desert tortoise within the Project site and in all areas subject to

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- Project-related ground-disturbing activities (e.g., road construction, utility lines). If the Project provides suitable habitat for desert tortoise, CDFW recommends the City retain a qualified biologist to conduct protocol level surveys for desert tortoise to determine presence/absence of this ESA and CESA-listed species. The EIR should provide results from a survey for desert tortoise adhering to survey methods described in the U.S. Fish and Wildlife Service's (USFWS) October 8, 2019 [Preparing for Any Action That May Occur Within the Range of the Mojave Desert Tortoise](#) (USFWS 2019).
- b) Disclosure: The EIR should provide full disclosure of the presence/absence of desert tortoise so CDFW may assist the City during the public comment period in identifying and mitigating for potential impacts on desert tortoise.
 - c) Avoidance, Minimization, and Mitigation: If desert tortoise is present, the Project EIR should be conditioned to avoid, minimize, and mitigate for potential impacts to desert tortoise and habitat. Appropriate mitigation may include obtaining appropriate take authorization under CESA and ESA. Appropriate authorization from CDFW may include an ITP or a Consistency Determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Also, CDFW recommends providing compensatory mitigation for permanent loss habitat. The proposed compensatory mitigation should ensure no net loss of habitat for desert tortoise.
5. Burrowing Owl (*Athene cunicularia*). The burrowing owl is a California Species of Special Concern (SSC). Burrowing owls are yearlong residents of open, dry grassland and desert habitats. Burrowing owls occur within the Antelope Valley region. The Project site could support requisite habitat elements for burrowing owls, which includes desert habitats, dry grasslands, shrubs, small rodent burrows, and soft soils.
- a) Protection Status: CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).
 - b) Survey and Analysis: CDFW recommends the EIR provide a detailed discussion of habitat suitability for burrowing owl within the Project site and in all areas subject to Project-related ground-disturbing activities (e.g., road construction, utility lines). If the Project provides suitable habitat for burrowing owl, CDFW recommends the City retain a qualified biologist to conduct surveys for burrowing owl to determine presence/absence of this SSC. The EIR should provide results from a survey for desert tortoise adhering to survey methods described in CDFG's March 7, 2012, [Staff Report on Burrowing Owl Mitigation](#) (CDFG 2012). A burrowing owl survey should be conducted no more than one year from the date of the Project's EIR. All survey efforts should be conducted by a qualified biologist. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15.
 - c) Disclosure: The EIR should provide full disclosure of the presence/absence of burrowing owl so CDFW may assist the City during the public comment period in identifying and mitigating for potential impacts on burrowing owl. CDFW would be unable to provide specific comments and recommendations during the comment period if surveys for burrowing owls is deferred until a later time (i.e., preconstruction surveys).
 - d) Avoidance, Minimization, and Mitigation: If burrowing owl is present, the Project EIR

Cynthia Campaña
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should be conditioned to avoid, minimize, and mitigate for potential impacts to burrowing owl. CDFW recommends mitigation methods described in the [Staff Report on Burrowing Owl Mitigation](#) (CDFG 2012). Inadequate avoidance and mitigation measures will result in the Project having substantial adverse direct and cumulative effect, either directly or through habitat modifications, on an SSC.

6. Jurisdictional Waters. According to U.S. Fish and Wildlife Service's (USFWS) [National Wetland Inventory](#), there is a stream adjacent to the Project site and a freshwater pond within the Project site (USFWS 2021). The Project may impact that stream and freshwater pond. Moreover, new roads proposed by the Project would increase imperviousness surface area within and adjacent to the Project site, potentially impacting stormwater drainage and increasing surface water runoff.
 - a) CDFW recommends the Project avoid impacting those waterbodies and associated vegetation to the greatest extent possible. Herbaceous and vegetation adjacent to the stream and in the freshwater pond protects the physical and ecological integrity of these water features and maintains natural sedimentation processes. Where the Project would occur near the stream/freshwater pond but may avoid impacts, the EIR should provide a justification as to why a chosen setback distance of the proposed development would be effective to avoid impacts on the stream/freshwater pond and associated vegetation.
 - b) The EIR should provide a stream delineation and analysis of impacts. The delineation should be conducted pursuant to the to the USFWS wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification. Modifications to a river, creek, or stream in one area may result in bank erosion, channel incision, or drop in water level along that stream outside of the immediate impact area. Therefore, CDFW recommends the EIR discuss whether impacts on streams within the Project site would impact those streams immediately outside of the Project site where there is hydrologic connectivity. Potential impacts such as changes to drainage pattern, runoff, and sedimentation should be discussed.
 - c) CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the Project applicant (or "entity") must notify CDFW pursuant to Fish and Game Code Section 1600 *et seq.* CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the EIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2021c).
 - d) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100-year storm event to provide information on how water and sediment is conveyed through the Project site. Additionally, the hydrological evaluation should assess the 100, 50, 25, 10, 5, and 2-year frequency flood events to evaluate existing and proposed conditions and erosion/scour potential. CDFW recommends the EIR discuss the results

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and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.

7. Nesting Birds. There are trees and shrubs within the Project site that could support nesting birds. Project activities occurring during the nesting bird season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.
 - a) 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). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
 - b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds. CDFW recommends the EIR include a measure whereby the Project avoids ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs. If avoidance is not feasible, the EIR should provide underlying reasons for the City's determination that avoidance is not feasible, even if it would substantially lessen or avoid significant effects on nesting birds. The EIR should include other feasible and specific mitigation measures that would provide a comparable lessening of the Project's potentially significant effect on nesting birds.

General Comments

- 1) Disclosure. An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document "shall describe feasible measures which could mitigate for impacts below a significant level under CEQA."
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency "shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures" (Pub. Resources Code, § 21081.6). CDFW recommends that the City provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources

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Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.

- b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the EIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the EIR should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place 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 site. CDFW also considers impacts to California Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The EIR 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 EIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from project-related impacts. 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, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2021d);
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
 - c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where project activities could lead to direct or indirect impacts off site. 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 a project. CDFW's

Cynthia Campaña
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[California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2021b). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];

- 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 a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2021e). Acceptable species-specific survey procedures may 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, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a 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) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2021f). The City should ensure data collected for the preparation of the EIR be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 5) Biological Direct, Indirect, and Cumulative 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 EIR should address the following:
- a) A discussion regarding Project-related indirect 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 (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 EIR;

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- b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion of Project-related changes on drainage patterns; 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 sites. The discussion should also address the potential water extraction activities 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;
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation 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 EIR; and,
 - f) 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 and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the EIR should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 6) 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 EIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas; access routes to the construction and staging areas; fuel modification footprint; and grading footprint;
 - b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document "shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project." CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document; and,
 - c) A range of feasible alternatives to the Project location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and

Cynthia Campaña
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sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The EIR “shall” include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.
- 7) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing an individual from a 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.
- 8) Compensatory Mitigation. The EIR should include mitigation measures for adverse project-related direct or indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project-related 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.
- 9) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the EIR 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

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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.

Conclusion

We appreciate the opportunity to comment on the NOP for the Tentative Tract Map No. 83232 Project 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 Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov or (562)-619-2230.

Sincerely,

DocuSigned by:

Erinn Wilson-Olgin

B6E58CFE24724F5...

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

ec: CDFW

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State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

References:

- [CDFW] California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>
- [CDFG] California Department of Fish and Game. 2003. Mohave Ground Squirrel Survey Guidelines. Updated July 2010. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83975>
- [CDFWa] California Department of Fish and Wildlife. 2021. Trimming of western Joshua trees and removal of dead western Joshua trees. What is “Take”? Available from: <https://wildlife.ca.gov/Conservation/CESA/WJT>
- [CDFWb] California Department of Fish and Wildlife. 2021. California Natural Diversity Database. [Accessed 2021 September 10]. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data#43018408-cnddb-in-bios>
- [CDFWc] California Department of Fish and Wildlife. 2021. Lake and Streambed Alteration Program. Available from: <https://wildlife.ca.gov/Conservation/LSA>

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- [CDFWd] California Department of Fish and Wildlife. 2021. Natural Communities. Available from: <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>
- [CDFWe] California Department of Fish and Wildlife. 2021. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>
- [CDFWf] California Department of Fish and Wildlife. 2021. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB>
- [CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>
- [CDFW] California Department of Fish and Wildlife. 2010. Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California. Available from:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83991&inline>
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. U.S. Fish and Wildlife Service. FWS/OBS-79/31. Washington, DC.
- Sawyer, J. O., Keeler-Wolf, T., and Evens J.M. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.
- [USFWS] United States Fish and Wildlife Service. 2021. Wetlands Mapper. [Accessed 13 September 2021]. Available from: <https://www.fws.gov/wetlands/data/mapper.html>.
- [USFWS] United States Fish and Wildlife Service. 2019. Preparing for Any Action That May Occur Within the Range of the Mojave Desert Tortoise. Available from:
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=174633&inline>

DEPARTMENT OF TRANSPORTATION

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*Making Conservation
a California Way of Life.*

Governor's Office of Planning & Research

September 08 2021

STATE CLEARINGHOUSE

September 8, 2021

Cynthia Campana
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

RE: Tentative Tract Map No. 83232 – Notice of
Preparation of an Environmental Impact
Report (NOP)
SCH # 2021090009
GTS # 07-LA-2021-03696
Vic. LA-14/PM: R67.908

Dear Cynthia Campana:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The proposed project consists of the subdivision of the subject property into 86 single-family residential lots in the R-7,000 (single family residential, 7,000 square foot minimum lot size) zone. Single family residences would be constructed on each of these lots. The project also includes extending to the south 62nd Street West and Hampton Street. Other road enhancements include constructing a new Street "L," Street "M," Street "N," and Avenue K-I2 cul-de-sac. These road improvements will provide vehicle access to the new homes. In addition, the project will extend existing water and sewer lines that are available immediately north of the site. These new utility lines will be buried underneath the new roadway segments. The City of Lancaster is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located approximately 4.5 miles away from State Route 14 (SR-14). From reviewing the NOP, Caltrans has the following comments. Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. Thus, Caltrans looks forward to reviewing the VMT analysis for this project.

For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

Note that the updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as

well as access management issues.” Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the City’s reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>. Caltrans encourages lead agencies to complete traffic safety impact analysis in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The following information is included for your consideration. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For TDM options to include in this project, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans’ review.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2021-03696.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



September 22, 2021

Ref. DOC 6303123

Ms. Cynthia Campana, Senior Planner
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Campana:

NOP Response to Tentative Tract Map No. 83232

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Focused Environmental Impact Report for the subject project on September 3, 2021. We offer the following comments regarding sewerage service:

1. The project area is outside the jurisdictional boundaries of the Districts and will require annexation into District No. 14 before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Annexation Program. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708.
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Avenue "J" West Trunk Sewer, located in Avenue J at 60th Street West. The Districts' 36-inch diameter trunk sewer has a capacity of 15.9 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2018.
3. The wastewater generated by the proposed project will be treated at the Lancaster Water Reclamation Plant, which has a capacity of 18.0 mgd and currently processes an average flow of 14.3 mgd.
4. The expected average wastewater flow from the project site, described in the NOP as 86 single-family homes, is 22,360 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the [Table 1, Loadings for Each Class of Land Use](#) link.
5. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is used by the Districts to upgrade or expand the Sewerage System. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727.

6. 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 the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer 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 2743 or at mandyhuffman@lacs.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MH:mh

cc: D. Curry
A. Schmidt
A. Howard

NATIVE AMERICAN HERITAGE COMMISSION

September 10, 2021

Governor's Office of Planning & Research

September 10 2021

STATE CLEARINGHOUSE

Cynthia Campana
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

Re: 2021090009, TTM 83232 Project, Los Angeles County

Dear Ms. Campana:

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.



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nahc@nahc.ca.gov
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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, subds. (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
Cultural Resources Analyst

cc: State Clearinghouse

Appendix B

INITIAL STUDY CHECKLIST



COMMUNITY
DEVELOPMENT

City of Lancaster Initial Study

1. **Project title and File Number:** Tentative Tract Map No. 83232
Variance No. 21-02
2. **Lead agency name and address:** City of Lancaster
Development Services Department
Community Development Division
44933 Fern Avenue
Lancaster, California 93534
3. **Contact person and phone number:** Cynthia Campaña, Senior Planner
(661) 723-6100
4. **Location:** Approximately 20± acres at the northwest corner of 60th Street West and Avenue K-12 (APN: 3204-008-048)
5. **Applicant name and address:** Royal Investors Group, LLC
9595 Wilshire Boulevard, Suite 708
Beverly Hills, CA 90212
6. **General Plan designation:** Urban Residential (UR)
7. **Zoning:** R-7,000 (single family residential, minimum lot size 7,000 square feet)
8. **Description of project:**

The proposed project includes the subdivision of the 20-acre project site into 86 lots and the construction of 86 single-family lots. A variance for the reduction of lot width, and lot depth development standards has also been requested. There are 13 lot depth reductions and seven lot width reductions. The proposed project also includes construction of the following roads to provide vehicle access to the new homes:

- Extending 62nd Street West and Hampton Street to the south.
- Constructing new Street “L,” Street “M,” Street “N,” and a new Avenue K-12 cul-de-sac.

In addition, the project would extend the existing water and sewer lines that are available immediately north of the site to serve the development. These new utility lines would be buried underneath the new roadway segments. The roadway extensions will also include street lighting and sidewalks. The roadways within the subdivision will be public.

9. Surrounding land uses and setting:

The project site is currently undeveloped and vacant. The properties surrounding the project site are predominantly vacant land and single-family homes. Quartz Hill High School is located a quarter mile south of the project site and Lane Ranch is located at the southeast corner of Avenue L and 60th Street West. Table 1 provides the zoning and the land uses of the properties adjacent to the site.

**Table 1
 Zoning/Land Use Information**

Direction	Zoning	Land Use
North	R-7,000	Single-family homes
East	R-7,000	Vacant and single-family homes
South	CPD	Vacant
West	SP 15-02	Vacant

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.)

Approvals from other public agencies for the proposed project include, but are not limited to, the following:

- California Department of Fish and Wildlife (CDFW)
- Antelope Valley Air Quality Management District (AVAQMD)
- California Department of Toxic Substances Control (DTSC)
- Los Angeles County Fire Department
- Los Angeles Waterworks District 40
- Southern California Edison

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with Assembly Bill (AB) 52, consultation letters for the proposed project were sent to nine individuals associated with seven tribes identified in the cultural resource report and/or who had requested to be included in the process. These letters were mailed on June 4, 2021 via certified return receipt mail. Table 2 identifies the tribes, the person to whom the letter was directed, and the date the letter was received.

**Table 2
Tribal Notification**

Tribe	Person/Title	Date Received
Gabrieleno Band of Mission Indians – Kizh Nation	Andrew Salas, Chairman	June 9, 2021
San Manuel Band of Mission Indians	Jessica Mauck, Director of Cultural Resources	June 9, 2021
San Fernando Band of Mission Indians	Donna Yocum, Chairperson	June 11, 2021
Fernandeno Tataviam Band of Mission Indians	Rudy Ortega, Tribal President	June 9, 2021
Fernandeno Tataviam Band of Mission Indians	Jairo Avila, Tribal Historic and Cultural Preservation Officer	June 9, 2021
Serrano Nation of Mission Indians	Mark Cochrane, Co-Chairperson	June 9, 2021
Serrano Nation of Mission Indians	Wayne Walker, Co-Chairperson	June 9, 2021
Morongong Band of Mission Indians	Robert Martin, Chairperson	June 14, 2021
Quechan Tribe of the Fort Yuma Reservation	Jill McCormick, Historic Preservation Officer	June 10, 2021

A response was received from two tribes: Fernandeno Tataviam Band of Mission Indians and San Manuel Band of Mission Indians. No concerns associated with specific tribal resources were identified. However, tribal resources are known to be in the general area/Antelope Valley. As such, mitigation measures were requested which would ensure the proper handling and notification of the tribes in the event that any cultural resources are encountered during construction activities. These measures have been included in the cultural resources section.

Figure 1, Project Location Map



Figure 1
Project Site and Location

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards & Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

 Cynthia Campaña, Senior Planner

 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Use. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
I. <u>AESTHETICS</u> . Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality or public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?			X	

- a. The City of Lancaster General Plan identifies five scenic areas in the City and immediately surrounding area (LMEA Figure 12.0-1). Views of these scenic areas are not generally visible from the project site or the immediately surrounding roadways. However, views of open desert and the mountains surrounding the Antelope Valley are available from the project site and roadways. The proposed project would be for a subdivision of 86 single-family lots and would be similar to the existing single-family homes near the project site. With implementation of the proposed project, the views would not change and would continue to be available from the roadways and project site. Therefore, no impact would occur.
- b. The project site is not located along any designated State Scenic Highways. There are no State designated scenic routes or highways within the City of Lancaster, however, the City of Lancaster Master Environmental Assessment identifies local roadways which could serve as scenic routes including 60th Street West between Avenue K and Avenue M due to views of the Portal Ridge to the west and the San Gabriel foothills to the south. There are non-native trees along the western boundary of the property, but are not highly visible along 60th Street West. The proposed project would be for a subdivision of 86 single-family lots similar to the existing single-family homes along 60th Street West between Avenue K and Avenue L and would not alter the potential views that make the roadway scenic. Additionally, the project site does not contain any rock outcroppings, historic structures. Therefore, the impacts would be less than significant.

- c. The proposed project is consistent with the zoning code as it pertains to this use and zone. Additionally, the City of Lancaster adopted Design Guidelines on December 8, 2009 (updated March 30, 2010). These guidelines provide the basis to achieve quality design for all development within the City. Development of the proposed project would change the visual character of the project site from vacant land to a residential subdivision of 86 lots. The new development would conform to design standards for subdivisions, the intent of the design guidelines, and would be compatible with nearby developments. Prior to the issuance of building permits for the project, the elevations of the models would be subject to review by the Architectural and Design Commission to ensure that the elevations are consistent with the design guidelines and City's vision for the look of the community. Therefore, impacts would be less than significant.

- d. Currently, no light is currently generated on the project site. Light generated in the area is primarily from residential lighting, vehicles headlights, street lights, and from Quartz Hill High School and Lane Ranch. The light generated from the project site would be in the form of motor vehicles, street lights, and residential lighting. The proposed street lights within the development would be directed downward onto the project site. Additionally, the proposed project would not introduce substantial amounts of glare as the development would be constructed primarily from non-reflective materials. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<p>II. <u>AGRICULTURE AND FORESTRY RESOURCES.</u> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>				X
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>				X
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p>				X
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>				X
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>				X

- a. The California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP), tracks and categorizes land with respect to agricultural resources. Land is designated as one of the following and each has a specific definition: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land.

The maps for each county are updated every two years. The Los Angeles County Farmland Map was last updated in 2018. Based on the 2018 map, the project site is designated as Grazing Land.

Grazing land is defined as “Land on which the existing vegetation is suited to the grazing of livestock.” As the project is not designated as farmland of importance by the State nor is it currently utilized for agricultural purposes, no impacts to agricultural resources would occur.

- b. The project site is zoned R-7,000, which does not allow for agricultural uses. Additionally, neither the project site, nor properties in the vicinity of the project site are under a Williamson Act contract. Therefore, no impacts would occur.
- c-d. According to the City of Lancaster’s General Plan, there are no forests or timberlands located within the City of Lancaster. Therefore, the proposed project would not result in the rezoning of forest or timberland and would not cause the loss of forest land or the conversion of forest land to non-forest land. Therefore, no impacts would occur.
- e. See responses to Items IIa-d.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
III. <u>AIR QUALITY</u> . Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

- a. Development proposed under the City’s General Plan would not create air emissions that exceed the Air Quality Management Plan (GPEIR pgs. 5.5-21 to 5.5-22). The project site is designated as UR and zoned R-7,000. Residential subdivisions are a permitted use under these zones. As such, any emissions associated with the proposed project have already been accounted for and the proposed project would not conflict with or obstruct the implementation of the Air Quality Management Plan and no impacts would occur.
- b. The project site is within the boundary of the Antelope Valley Air Quality Management District (AVAQMD) and therefore, are subject to compliance with the thresholds established by the AVAQMD. These thresholds were provided in the AVAQMD’s *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines document*, dated August 2016. These thresholds have been summarized below in Table 3.

Table 3
AVAQMD Air Quality Thresholds

Criteria Pollutant	Annual Threshold (tons)	Daily Threshold (pounds)
Greenhouse Gases (CO ₂ e)	100,000	548,000
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO _x)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO _x)	25	137
Particulate Matter (PM ₁₀)	15	82
Particulate Matter (PM _{2.5})	12	65
Hydrogen Sulfide (H ₂ S)	10	54
Lead (Pb)	0.6	3

Construction of the proposed project would generate air emissions associated with grading, use of heavy equipment, construction worker vehicles, etc. However, the emissions are not anticipated to exceed the established thresholds identified above due to the size and the type of proposed project.

The proposed project would generate approximately 840 daily vehicle trips as determined by the City Traffic Engineer. These trips would generate air emissions; however, the amount of emissions from the estimated vehicle trips would not be sufficient to create or significantly contribute towards violations of air quality standards. Therefore, emissions associated with the occupancy of the proposed subdivision would be less than significant.

- c. The closest sensitive receptors are single-family residences north and east of the project site and Quartz Hill High School located .25 miles from the project site. The trips associated with the proposed project would generate emissions; however, the amount of traffic generated by the project is not sufficient significantly impact nearby intersections or roadways and create or contribute considerably to violations of air quality standards on either a localized or regional basis. Therefore, substantial pollutant concentrations would not occur and impacts would be less than significant.

However, since the construction of the proposed project would result in the disturbance of the soil, it is possible individuals could be exposed to Valley Fever. Valley Fever or coccidioidomycosis, is primarily a disease of the lungs caused by the spores of the *Coccidioides immitis* fungus. The spores are found in soils, become airborne when the soil is disturbed, and are subsequently inhaled into the lungs. After the fungal spores have settled in the lungs, they change into a multicellular structure called a spherule. Fungal growth in the lungs occurs as the spherule grows and bursts, releasing endospores, which then develop into more spherules.

Valley Fever is not contagious, and therefore, cannot be passed on from person to person. Most of those who are infected would recover without treatment within six months and would have a life-long immunity to the fungal spores. In severe cases, especially in those patients with rapid and extensive primary illness, those who are at risk for dissemination of disease, and those who have disseminated disease, antifungal drug therapy is used.

Nearby sensitive receptors as well as workers at the project site could be exposed to Valley Fever from fugitive dust generated during construction. There is the potential that cocci spores would be stirred up during excavation, grading, and earth-moving activities, exposing construction workers and nearby sensitive receptors to these spores and thereby to the potential of contracting Valley Fever. However, implementation of Mitigation Measure Number 11, under Geology and Soils, which requires the project operator to implement dust control measures in compliance with AVAQMD Rule 403, and implementation of Mitigation Measure Number 1, below, which would provide personal protective respiratory equipment to construction workers and provide information to all construction personnel and visitors about Valley Fever, the risk of exposure to Valley Fever would be minimized to a less than significant level.

Mitigation Measures

1. Prior to ground disturbance activities, the project operator shall provide evidence to the Development Services Director that the project operator and/or construction manager has developed a “Valley Fever Training Handout”, training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, handout(s) and schedule shall be submitted to the Development Services Director within 24 hours of the first training session. Multiple training sessions may be conducted if different work crews will come to the site for different stages of construction; however, all construction personnel shall be provided training prior to beginning work. The evidence submitted to the Development Services Director regarding the “Valley Fever Training Handout” and Session(s) shall include the following:
 - A sign-in sheet (to include the printed employee names, signature, and date) for all employees who attended the training session.
 - Distribution of a written flier or brochure that includes educational information regarding the health effects of exposure to criteria pollutant emissions and Valley Fever.
 - Training on methods that may help prevent Valley Fever infection.
 - A demonstration to employees on how to use personal protective equipment, such as respiratory equipment (masks), to reduce exposure to pollutants and facilitate recognition of symptoms and earlier treatment of Valley Fever. Where respirators are required, the equipment shall be readily available and shall be provided to employees for use during work. Proof that the demonstration is included in the training shall be submitted to the county. This proof can be via printed training materials/agenda, DVD, digital media files, or photographs.

The project operator also shall consult with the Los Angeles County Public Health to develop a Valley Fever Dust Management Plan that addresses the potential presence of the *Coccidioides* spore and mitigates for the potential for *Coccidioidomycosis* (Valley Fever). Prior to issuance of permits, the project operator shall submit the Plan to the Los Angeles County Public Health for review and comment. The Plan shall include a program to evaluate the potential for exposure to Valley Fever from construction activities and to identify

appropriate safety procedures that shall be implemented, as needed, to minimize personnel and public exposure to potential *Coccidioides* spores. Measures in the Plan shall include the following:

- Provide HEP-filters for heavy equipment equipped with factory enclosed cabs capable of accepting the filters. Cause contractors utilizing applicable heavy equipment to furnish proof of worker training on proper use of applicable heavy equipment cabs, such as turning on air conditioning prior to using the equipment.
- Provide communication methods, such as two-way radios, for use in enclosed cabs.
- Require National Institute for Occupational Safety and Health (NIOSH)-approved half-face respirators equipped with minimum N-95 protection factor for use during worker collocation with surface disturbance activities, as required per the hazard assessment process.
- Cause employees to be medically evaluated, fit-tested, and properly trained on the use of the respirators, and implement a full respiratory protection program in accordance with the applicable Cal/OSHA Respiratory Protection Standard (8 CCR 5144).
- Provide separate, clean eating areas with hand-washing facilities.
- Install equipment inspection stations at each construction equipment access/egress point. Examine construction vehicles and equipment for excess soil material and clean, as necessary, before equipment is moved off-site.
- Train workers to recognize the symptoms of Valley Fever, and to promptly report suspected symptoms of work-related Valley Fever to a supervisor.
- Work with a medical professional to develop a protocol to medically evaluate employees who develop symptoms of Valley Fever.
- Work with a medical professional, in consultation with the Los Angeles County Public Health, to develop an educational handout for on-site workers and surrounding residents within three miles of the project site, and include the following information on Valley Fever: what are the potential sources/ causes, what are the common symptoms, what are the options or remedies available should someone be experiencing these symptoms, and where testing for exposure is available. Prior to construction permit issuance, this handout shall have been created by the project operator and reviewed by the project operator and reviewed by the Development Services Director. No less than 30 days prior to any work commencing, this handout shall be mailed to all existing residences within a specified radius of the project boundaries as determined by the Development Services Director. The radius shall not exceed three miles and is dependent upon the location of the project site.
- When possible, position workers upwind or crosswind when digging a trench or performing other soil-disturbing tasks.
- Prohibit smoking at the worksite outside of designated smoking areas; designated smoking areas will be equipped with handwashing facilities.

- Post warnings on-site and consider limiting access to visitors, especially those without adequate training and respiratory protection.
 - Audit and enforce compliance with relevant Cal OSHA health and safety standards on the job site.
- d. Construction of the proposed project is not anticipated to produce significant objectionable odors. Construction equipment may generate some odors, but these odors would be similar to those produced by vehicles traveling along Avenue K-8, 60th Street West, and Avenue L. Most objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. These types of uses are not part of the proposed project. Odors may also be generated by typical residential activities (e.g., cooking, etc.). However, these odors are considered to be normal odors associated with residential development and less than significant. Therefore, impacts associated with odors would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
IV. <u>BIOLOGICAL RESOURCES</u> . Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

- a. A biological resources survey was conducted for the project site by Callyn D. Yorke and documented a report titled, "Biological Resources Report on APN: 3204-008-031, Twenty Acres, 60th Street West, North of Avenue L, Lancaster, California" date September 2005. This report documented the findings of both a database search and a field survey. The field survey was conducted on September 16, 2005 and September 22, 2005 using pedestrian transects.

An update to the 2005 report was conducted by Callyn D. Yorke and documented a report titled, “Biological Resources Report on APN: 3204-008-031, 19 Acres, 60th Street West, North of Avenue L, Lancaster, California” dated September 2018. The field survey was conducted on September 19, 2018 and September 20, 2018 using pedestrian transects.

In 2005, the site was disturbed due to clearing of vegetation, farming, grazing, refuse disposal and local traffic. In 2018, the site was cleared and majority of the site was disturbed by grading, fire, trash disposal, OHV and foot traffic.

Plants

The existing vegetation in 2005 was in various stages of re-growth and included mostly exotic weeds and native vegetation. A total of 46 species of plant was found on the site (Table 4). There was relatively moist soils along the western boundary of the project site that supported several species of riparian trees and shrubs, but no State of Federally listed endangered, rare, or sensitive plants were found on site in 2005.

Table 4: 2005 Observed Plants

Chinese Elm (<i>Ulma Parviflora</i>)	Salt Cedar (<i>Tamarix Ramosissima</i>)	Jimson Weed (<i>Datura Meteloides</i>)	Fremont Cottonwood (<i>Populus Fremontii</i>)
Black Willow (<i>Salix Lasiandra</i>)	Narrow-Leaf Willow (<i>Salix Exigua</i>)	Peach (<i>Prunus Sp.</i>)	Parry Gilia (<i>Gilia Parraye</i>)
Rabbitfoot Polypogon (<i>Polypogon Monspeliensis</i>)	Wild Oat (<i>Avena Fatua</i>)	Cheat Grass (<i>Bromus Secalinus</i>)	Carinate Brome (<i>Bromus Carinatus</i>)
Red-stemmed Filaree (<i>Erodium Cicutarum</i>)	Locust (<i>Robinia Pseudo-Acacia</i>)	Rattlesnake Weed (<i>Euphorbia Albomarginata</i>)	Turkey Mullein (<i>Eremocarpus Setigerus</i>)
Black Mustard (<i>Brassica Nigra</i>)	Pepperweed (<i>Lepidium Latifolium</i>)	Brassicaceae (<i>Alyssim Sp.</i>)	Tumble Mustard (<i>Sisymbirum Allissimum</i>)
Common Burdock (<i>Arctium Minus</i>)	Mulefat (<i>Bacchari Glutinosa</i>)	Poverty Sumpweed (<i>Iva Axillaris</i>)	Common Sunflower (<i>Helianthus Annuus</i>)
Knapweed (<i>Centaurea Sp.</i>)	Wire Lettuce (<i>Stephanomeria exigua</i>)	Telegraph Weed (<i>Heterotheca Graniflora</i>)	Cudweed Aster (<i>Corethrogyne Filaginifolia</i>)

Rabbitbush (Chrysothamnus Nauseosus)	Bursage (Ambrosia Tomentosa)	Annual Bursage (Amrosia Acanthocarpa)	Horseweed (Conzya Canadensis)
Vingear Weed (Trichostemma Lanceolata)	Four-Winged Saltbush (Atriplex Canescens)	Fiddleneck (Amsinkia Tessellata)	Autumn Vinegar Weed (Lessingia Lemmoni)
Russian Knapweek (Acroptilon Reprens)	Foxtail Chess (Bromus Rubens)	Soft Chess (Bromus Mollis)	Downy Brome (Bromus Tectorum)
Broadleaf Plantain (Plantago Major)	Russian Thistle (Salsola Iberica)	Hydrophyllacea (Phacelia Sp.)	Wild Alder (Alnus Rhombifolia)
Hairy Fleabane (Conzya Bonariensis)			

In 2018, a total of 48 species of plant were found on site (Table 5) and the results of the plant survey were essentially the same as the September, 2005 study and report. With the exception of variation in species abundance, and disappearance of adventitious riparian element due to drought, there has been no significant vegetation change on the property. No State or Federally listed endangered, rare or sensitive plant species were found on site. There are no Joshua Trees or California Juniper on the property. Adjacent land west of the site contains Joshua Trees, but the proposed project would not impact the Joshua Trees.

Table 5: 2018 Observed Plants

Puncture Weed (Tribulus Terrestris)	Salt Cedar (Tamarix Ramosissim)	Jimson Weed (Datura Meteloides)	Skeleton Weed (Eriogonum Deflexium)	Soft Chess (Bromus Mollis)	Mediterranean Schismus (Schismus Barbatus)
Six Weeks Fescue (Festuca octofolora)	Indian Rice Grass (Orzopsis)	Creeping Bentgrass (Agrostis Stolonifera)	Rye Brome (Bromus Secalinus)	Foxtail Chess (Bromus Rubens)	Broadleaf Plantain (Plantago Major)
Rabbitfoot Polypogon (Polypogon Monspeliensis)	Wild Oat (Avena Fatua)	Cheat Grass (Bromus Secalinus)	Carinate Brome (Bromus Carinatus)	Vingear Weed (Trichoste mma Lanceolata)	Foxtail Chess (Bromus Mafritensis)
Red- stemmed	Locust (Robinia)	Rattlesnake Weed	Turkey Mullein	Four- Winged	Russian Thistle

Filaree (Erodium Cicutarium)	Pseudo- Acacia)	(Euphorbia Albomarginat a)	(Eremocarpus Setigerus)	Saltbush (Atriplex Canescens)	(Salsola Iberica)
Cheat Brome (Bromus Tectorum)	Pepperweed (Lepidium Latifolium)	Brassicaceae (Alyssim Sp.)	Tumble Mustard (Sisymbrium Allissimum)	Fiddleneck (Amsinkia Tessellata)	White Alder (Alnus Rhombifolia)
Black Mustard (Brassica Nigra)	Dove Weed (Eremocarpus Setigerus)	Poverty Sumpweed (Iva Axillaris)	Common Sunflower (Helianthus Annuus)	Horseweed (Conzya Canadensis)	Hairy Fleabane (Conzya Bonariensis)
Knapweed (Centaurea Sp.)	Winterfat (Krascheninn ikovia Lanata)	Telegraph Weed (Heterotheca Graniflora)	Cudweed Aster (Corethrogyne Filaginifolia)	Autumn Vinegar Weed (Lessingia Lemmoni)	Russian Knapweek (Acroptilon Reprans)
Rabbitbush (Chrysotha mnus Nauseosus)	Spiny Saltbush (Atriplex Spinifer)	Annual Bursage (Amrosia Acanthocarpa)	Burrow-weed (Ambrosia Dumosa)	Cheesebus h (Hymenocle ea)	Danelion (Teraxacum)

Animals

In 2005, there were two species of butterfly, a side-blotched lizard, loggerhead shrike, ten species of bird that were found on the site during the survey and can be found in Table 6. There were sign of seven species of mammal that was found including valley pocket gopher, California ground squirrel and Merriam's kangaroo rat.

Table 6: 2005 Observed Animals

Common Buckeye (Junonia Coenia)	Common White (P. Prtodice)	Side-blotched Lizard (Uta Stansburiana)	Red-Tailed Hawk (Buteo Jamaicensis)
Mourning Dove (Zenaida Macroua)	Say's Phoebe (Sayornis Saya)	Common Raven (Corvus Corax)	Loggerhead Shrike (Lanius Ludovicianus)
Orange-Crowned Wabler (Vermivora Celata)	Western Meadowlark (Stutrnella Neglecta)	Red-Winged Blackbird (Agelaius Phoeniceus)	Savannah Sparrow (Passerculus Sandwichensis)

House Finch (Carpodacus mexicanus)			
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In 2018, no butterflies or amphibians were found on the site. Four side-blotched lizards were found on the site. In addition to the same bird species found in 2005 (see table 6), several new species of birds were found during the 2018 survey. Those species are found in Table 7. No desert tortoises, desert kit foxes or their sign were observed within the study site. No suitable Mohave ground squirrel habitat was present within the project site.

Table 7: Observed Animals

Turkey Vulture (Cathartes Aura)	Cooper’s Hawk (Accipiter Cooperi)	Common Barn Owl (Tyto Alba)	Mourning Dove (Zenaida Macroura)
Anna’s Hummingbird (Calypte Anna)	American Kestrel (Falco Sparverius)	Common Raven (Corvus Corax)	Barn Swallow (Birundo Rustica)
House Wren (Troglodytes Aedon)	Northern Mockingbird (Mimus Polyglottos)	Lincoln Sparrow (Melospiza Lincolnii)	House Finch (Carpodacus Mexicanus)
American Goldfinch (Spinus Tristis)	Lesser Goldfinch (Spinus Psaltria)	Common Side-Blotched Lizard (Uta Stansburiana)	

A Phase I protocol survey for Burrowing Owl was completed on the site during the 2018 survey and several pellets were found on a concrete cylinder along the southern property line indicating that a burrowing owl is present, but no burrows were identified on the site. In addition, a Cooper’s Hawk was flushed from the trees on the western border of the project site and nesting bird species could be present at the time that construction is anticipated to start. Therefore, mitigation measures have been identified below requiring preconstruction surveys to ensure that potential impacts to burrowing owls and nesting bird remain less than significant.

Mitigation Measures

- Updated burrowing owl protocol surveys shall be conducted on the project site in accordance with the procedures established by the California Department of Fish and Wildlife prior to the start of construction/ground disturbing activities. If burrowing owls are identified using the project site, the applicant shall contact the California Department of Fish and Wildlife (CDFW) to determine the appropriate mitigation/management requirements. At a minimum, the following shall be followed: If burrowing owls are detected on site, no ground-disturbing activities, such as vegetation clearance or grading,

shall be permitted within a buffer of no fewer than 650 feet from an occupied burrow during the breeding season (February 1 to August 31), unless otherwise authorized by CDFW. During the non-breeding (winter) season (September 1 to January 31), ground-disturbing work can proceed as long as the work occurs no closer than 165 feet from the burrow. Depending on the level disturbance, a smaller buffer may be established in consultation with CDFW.

3. If burrow avoidance is infeasible during the non-breeding season or during the breeding season (February 1 through August 31), where resident owls have not yet begun egg laying or incubation, or where the juveniles are foraging independently and capable of independent survival, a qualified biologist shall implement a passive relocation program in accordance with Appendix E1 (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 CDFW Staff Report on Burrowing Owl Mitigation.
 4. If passive relocation is required, a qualified biologist shall prepare a Burrowing Owl Exclusion and Mitigation Plan and Mitigation Land Management Plan in accordance with CDFW's 2012 Staff Report on Burrowing Owl Mitigation and for review by CDFW prior to passive relocation activities. The Burrowing Owl Exclusion and Mitigation Plan shall include all necessary measures to minimize impacts to burrowing owls during passive relocation, including all necessary monitoring of owls and burrows during passive relocation efforts.
 5. A nesting bird survey shall be conducted within 30 days prior to the start of construction/ground disturbing activities. If nesting birds are encountered, all work shall cease until either the young birds have fledged or the appropriate permits are obtained from the California Department of Fish and Wildlife (CDFW). If active bird nests are identified using the project site during the survey, the applicant shall contact the California Department of Fish and Wildlife to determine the appropriate mitigation/management requirements. Impact to nests will be avoided by delay of work or establishing a buffer of 500 feet around active raptor nests and 50 feet around other migratory bird species nests.
- b. The project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Therefore, no impact would occur.
 - c. There are no State or federally protected wetlands on the project site as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur.
 - d. The project site is not part of an established migratory wildlife corridor. Therefore, no impacts would occur.
 - e. The proposed project would not conflict with any local policies or ordinances, such as a tree preservation policy, protecting biological resources. The proposed project would be subject to the requirements of Ordinance No. 848, Biological Impact Fee, which requires the payment of \$770/acre to offset the loss of biological resources in the Antelope Valley as a result of development. Therefore, no impacts would occur.

- f. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans which are applicable to the project site. The West Mojave Coordinated Habitat Conservation Plan only applies to federal land, specifically land owned by the Bureau of Land Management. In conjunction with the Coordinated Management Plan, a Habitat Conservation Plan (HCP) was proposed which would have applied to all private properties within the Plan Area. However, this HCP was never approved by the California Department of Fish and Wildlife nor was it adopted by the local agencies (counties and cities) within the Plan Area. As such, there is no HCP that is applicable to the project site and no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
V. <u>CULTURAL RESOURCES</u> . Would the project:				
1. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			X	
2. Cause a substantial adverse change in the significance of an archaeological resources pursuant to §15064.5?		X		
3. Disturb any human remains, including those interred outside of dedicated cemeteries?				X

a-c. A cultural resource survey was conducted for the project site by RT Factfinders and the results documented in a report entitled "Phase I Cultural Resource Investigation for 20 acres at the intersection of 60th Street West and West Avenue K-12 Lancaster, Los Angeles County California" and dated October 2018. The report includes a records search, map search and a pedestrian survey of the project site.

Research was performed by reviewing previous studies within the area, historic period maps and early land records. There has been one pervious cultural resource survey of the subject property, but there are no previously recorded sites. There are archaeological sites within one mile of the project site, but none of the resources within the site have been determined to be significant.

On October 12, 2018, a field survey was conducted by walking parallel pedestrian transects spaced approximately 15 meters apart. One complex historic period site was identified. The site consists of two residential foundations, an outbuilding foundation, an earth banked holding pond, a well, landscape trees, and an agricultural irrigation system. The residential foundations and hold ponds reflect locations plotted on the 1915 through 1958 historic period maps. The cultural resource though is not eligible for nomination to the California Register of Historic Resources because the site has minimal association with broad patterns of history. The site represents the remains of early to mid-20th century rural occupation circa 1915-1970s. Such sites are quite common throughout the Antelope Valley. The site cannot be associated with any past historically significant persons. The deposits do not meet any characteristic stated in Criterion C for attaining edibility to the National Register of Historic Places "that embody distinctive characteristics of type, period or method of construction, or that represent the work of a master, or that possess high artistic values or that represent a significant and distinguishable entity whose components may lack individual distinction", which is typically applied to intact buildings and structures. The site is of a common type and is in poor condition. The site is not likely to yield information important in history because it is of a redundant type, disturbed, and dates to better-known period in Lancaster's history. Therefore, the site is considered not eligible to the National Register, hence is considered not significant.

No human remains, including those interred outside of formal cemeteries, were discovered on the project site. Therefore, no impacts would be anticipated to occur.

In addition to the cultural resource that were identified during the field study, it is possible that previously unknown resources could be encountered during the course of construction-related activities. Additionally, tribes contacted during the AB 52 process requested that mitigation measures be included as part of the project to ensure the proper handling and treatment of any cultural resources encountered on the project site. These measures have been included and are identified below. With incorporation of these measures, impacts would be less than significant.

Mitigation Measures

6. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. Work on the portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Fernandeano Tataviam Band of Mission Indians and the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI) shall be contacted regarding any pre-contact and/or post-contact/historic era finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.
7. The applicant shall, in good faith, consult with the Fernandeano Tataviam Band of Mission Indians on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.
8. If humans or funerary objects are encountered during any construction activities associated with the proposed project, work within 100-foot buffer shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5.
9. If significant Native American resources are discovered and avoidance cannot be ensured a Secretary of Interior qualified archaeologist shall be retained to develop a cultural resource Treatment Plan, as well as a Discovery and Monitoring Plan. A copy of the draft document shall be provided to the appropriate tribe(s) for review and comment. All in field investigation, assessment and/or data recovery pursuant to the Treatment Plan shall be monitored by a Tribal Monitor. Additionally, the applicant and the City of Lancaster shall consult with the appropriate tribe(s) on the discussion and treatment of any artifacts or other cultural materials encountered during the project.
10. SMBMI shall be contacted, as detailed in mitigation measure 5, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a cultural resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with SMBMI, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

11. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to SMBMI. The Lead Agency and/or applicant shall, in good faith, consult with SMBMI throughout the life of the project.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VI. <u>ENERGY</u> . Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficient?				X

- a. Project construction would consume energy in two general forms: 1) the fuel energy consumed by construction vehicles and equipment and 2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials.

The proposed project would consume energy for interior and exterior lighting, heating/ventilation and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems, among other things. The proposed project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. Furthermore, the electricity provider is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor owned utilities, electric service providers, and community choice aggregators (CCA) to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Renewable energy is generally defined as energy that

comes from resources, which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat.

The project would adhere to all Federal, State, and local requirements for energy efficiency, including the Title 24 standards, as well as the project's design features and as such the project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Therefore, no impacts would occur.

- b. In 1978, the California Energy Commission (CEC) established Title 24, California's energy efficiency standards for residential and non-residential buildings, in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, and provide energy efficiency standards for residential and non-residential buildings. The 2016 standards went into effect on January 1, 2017 and substantially reduce electricity and natural gas consumption. Additional savings result from the application of the standards on building alterations such as cool roofs, lighting, and air distribution ducts.

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. An updated version of both the California Building Code and the CALGreen Code went into effect on January 1, 2020.

In 2014, Lancaster created Lancaster Choice Energy (LCE), allowing residents and businesses in Lancaster to choose the source of their electricity, including an opportunity to opt up to 100% renewable energy. SCE continues to deliver the electricity and provide billing, customer service and powerline maintenance and repair, while customers who choose to participate in this program would receive power from renewable electric generating private-sector partners at affordable rates.

The City of Lancaster adopted the Zero Net Energy (ZNE) Home Ordinance in February 2017. The ZNE Ordinance mandates all builders to install a solar system equal to two watts per square foot for each home built. Developers have three options available to comply with the City's ZNE requirement: a solar component, mitigation fees in lieu of a solar component, or a combination of both. The houses constructed as a result of the proposed project would comply with all of these regulations and would not conflict or obstruct a state or local plan for renewable energy or energy efficiency. This ordinance was made obsolete when the CalGreen Code went into effect on January 1, 2020. Therefore, no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VII. <u>GEOLOGY AND SOILS</u> . Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

- a. The project site is not identified as being in or in proximity to a fault rupture zone (LMEA Figure 2-5). According to the Seismic Hazard Evaluation of the Lancaster East and West Quadrangles, the project site may be subject to intense seismic shaking (LMEA pg. 2-16). However, the proposed project would be constructed in accordance with the seismic requirements of the

Uniform Building Code (UBC) adopted by the City, which would render any potential impacts to a less than significant level. The site is generally level and is not subject to landslides (SSHZ).

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking or other events. This phenomenon occurs in saturated soils that undergo intense seismic shaking typically associated with an earthquake. There are three specific conditions that need to be in place for liquefaction to occur: loose granular soils, shallow groundwater (usually less than 50 feet below ground surface) and intense seismic shaking. In April 2019, the California Geologic Survey updated the Seismic Hazard Zones Map for Lancaster (SSHZ) (<https://maps.conservation.ca.gov/cgs/EQZApp/app/>). Based on these maps, the project site is not located in an area at risk for liquefaction. No impacts would occur

- b. The project site is rated as having a low risk for soil erosion (USDA SCS Maps) when cultivated or cleared of vegetation. As such, there remains a potential for water and wind erosion during construction. The proposed project would be required, under the provisions of the Lancaster Municipal Code (LMC) Chapter 8.16, to adequately wet or seal the soil to prevent wind erosion. Additionally, the following mitigation measure shall be required to control dust/wind erosion.

Water erosion controls must be provided as part of the proposed project's grading plans to be reviewed and approved by the Capital Engineering Division. These provisions, which are a part of the proposed project, would reduce any impacts to less than significant levels.

Mitigation Measures

- 12. The applicant shall submit a Dust Control Plan to the Antelope Valley Air Quality Management District (AVAQMD) for review and approval in accordance with Rule 403, Fugitive Dust, prior to the issuance of any grading and/or construction permits. This plan shall demonstrate adequate water or dust suppressant application equipment to mitigate all disturbed areas.
- c. Subsidence is the sinking of the soil caused by the extraction of water, petroleum, etc. Subsidence can result in geologic hazards known as fissures. Fissures are typically associated with faults or groundwater withdrawal, which results in the cracking of the ground surface. According to Figure 2-3 of the City of Lancaster's Master Environmental Assessment, the project site is not known to be within an area subject to fissuring, sinkholes, or subsidence or any other form of geologic unit or soil instability. The closest sinkholes and fissures are located along Avenue I between 50th Street West and 60th Street West approximately 3 miles northwest of the project site. For a discussion of potential impacts regarding liquefaction, please refer to Section Item VII.a. Therefore, no impacts would occur.
- d. The soil on the project site is characterized by a low shrink/swell potential (LMEA Figure 2-3). A soils report for the proposed project shall be submitted to the City by the project developer prior to grading and the recommendations of the report shall be incorporated into the development of the proposed project. Therefore, impacts would be less than significant.
- e. The proposed project would be tied into the sanitary sewer system. No septic or alternative means of waste water disposal are part of the proposed project. Therefore, no impacts would occur.

- f. The proposed project would not directly or indirectly destroy a unique paleontological resource, site, or geologic feature. Therefore, no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VIII. <u>GREENHOUSE GAS EMISSIONS</u> . Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

a-b. The proposed project consists of an 86-lot residential subdivision. As discussed in Item III.b., the proposed project would generate air emissions during construction and operational activities, some of which may be greenhouse gases. These emissions are anticipated to be less than the thresholds established by AVAQMD due to the size of the project and therefore would not prevent the State from reaching its greenhouse gas reduction targets. Once the development is operational, it would generate emissions, primarily from vehicles and other activities associated with the residential uses, including yard maintenance, heating/cooling maintenance, etc. however, the development would require to comply with the requirements of the City’s Net Zero Energy Ordinance, Water Efficient Landscape Ordinance, and other requirements which increase the efficiency of buildings and reduce air emissions. Therefore, impacts would be less than significant.

The proposed project would also be in compliance with the greenhouse gas goals and polices identified in the City of Lancaster General Plan (LMEA p.7-2 to 7-15) and in the City’s adopted Climate Action Plan. Therefore, impacts with respect to conflicts with an agency’s plans, policies, and regulations would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?		X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

a-b. The proposed project consists of an 86-lot residential subdivision. Typical construction materials would be utilized during development of the subdivision. Occupants of the subdivision would typically utilize household cleaners (e.g., cleanser, bleach, etc.), fertilizer, and potentially limited use of common pesticides. These uses would be similar to other residential development in the area. The proposed project is not located along a hazardous materials transportation corridor (LMEA p. 9.1-14 and Figure 9.1-4). Therefore, no impacts would occur

- c. The project site is located within a quarter mile of an existing or proposed school. The closest school to the project site is Quartz Hill High School approximately .25 miles south of the project site at 6040 Avenue L. However, the proposed project is for a residential subdivision which will not emit hazardous emissions or handle hazardous/acutely hazardous materials, substances, or waste. Therefore, no impacts would occur.
- d. A Phase I Environmental Site Assessment was prepared for the proposed project by California Environmental Geologist & Engineers Inc. The results of the study are documented in a report entitled "Environmental Site Assessment- Phase I Undeveloped Property, 60th Street West between Avenue K-10 and West Avenue L, APN 3204-008-048, Lancaster, California, 93536" and dated October 2018.

As part of the environmental site assessment, a site visit was conducted on September 29, 2018. No hazardous materials/waste were observed at the subject site. No evidence of environmental concerns, including hazardous material disposal, sewage discharge, wells, septic systems, underground or above ground (UST/AST) storage tanks, or stressed vegetation, was observed on the project site.

The subject property was utilized for agricultural purposes from 1950's to 1990's. It is unknown if pesticides and/or herbicides were applied to the crops grown on the property; however, there is a potential for soil contamination in excess of regulatory thresholds for residential uses to occur. A mitigation measure has been identified requiring soil sampling and testing to assess the presence or absence of elevated concentrations of agricultural chemicals. In the event that elevated levels are identified, the soil would be removed and disposed of or remediated in accordance with applicable regulations. With implementation of the mitigation measure, impacts would be less than significant.

In addition to the site visit, a regulatory database search was conducted for the project site. The records search includes historical aerial photographs and regulatory databases. The project site is not listed on any hazardous materials sites. Two sites were located within one mile of the project site. Based on the distance to the site and site status, it was determined that the listings would not impact the project site. Therefore, impacts would be less than significant.

Mitigation Measures

- 13. Soil sampling and testing shall be conducted on the project site to determine the presence or absence of elevated agricultural chemicals. If elevated levels of these chemicals are identified above regulatory levels for residential uses, the site shall be remediated in accordance with the recommendations of the report and all applicable regulations prior to the issuance of any construction related permits.
- e. The proposed project is not located within an airport land use plan or within two miles of a public/private airport. The nearest airfield, General William Fox Airfield, is located approximately 4 to 5 miles northeast of the project site. Therefore, no safety hazards for people residing in the project area would be anticipated and no impacts would occur.

- f. The traffic generated by the proposed project is not expected to block the roadways and improvements that have been conditioned as part of the project would ensure that traffic operates smoothly. Therefore, the proposed project would not impair or physically block any identified evacuation routes and would not interfere with any adopted emergency response plan. Impacts would not occur.

- g. The surrounding properties are vacant land and single-family residences. It is possible that these lands could be subject to grass and building fires. The project site is within the service boundaries of Los Angeles County Fire Station No. 84, located at 5030 West Avenue L-14, which would serve the project site in the event of a fire. Therefore, potential impacts from wildland fires would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
X. <u>HYDROLOGY AND WATER QUALITY</u> . Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site			X	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff			X	
iv) Impede or redirect flood flows			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

- a. The project site is not located in an area with an open body of water or in an aquifer recharge area. The proposed project would be required to comply with all applicable provisions of the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program establishes a comprehensive storm water quality program to manage urban storm water and minimize pollution of the environment to the maximum extent practicable. The reduction of

pollutants in urban storm water discharge through the use of structural and nonstructural Best Management Practices (BMPs) is one of the primary objectives of the water quality regulations. BMPs that are typically used to management runoff water quality include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets, cleaning parking lots on a regular basis, incorporating peak-flow reduction and infiltration features (grass swales, infiltration trenches and grass filter strips) into landscaping and implementing educational programs. The proposed project would incorporate appropriate BMPs during construction, as determined by the City of Lancaster Development Services Department. Therefore, impacts would be less than significant.

The proposed project consists of 86 single-family residential lots. Single family residences are not a use that would normally generate wastewater that violates water quality standards or exceeds waste discharge requirements. Therefore, impacts would be less than significant.

- b. The proposed project would not include any groundwater wells or pumping activities. All water supplied to the proposed project would be obtained from Los Angeles County Water District No. 40. Therefore, impacts would be less than significant.
- c. Development of the proposed project would increase the amount of surface runoff as a result of impervious surfaces associated with the grading of the site. The proposed project would be designed, on the basis of a hydrology study, to accept current flows entering the property and to handle the additional incremental runoff from the developed sites. Therefore, impacts from drainage and runoff would be less than significant.

The project site is designated as Flood Zone X-Shaded per the Flood Insurance Rate Map (06037C0415F). Flood Zone X-Shaded is located outside of the 100-year flood zone but within the 500-year flood zone. Therefore, impacts would be less than significant.

- d. The project site is not located within a coastal zone. Therefore, tsunamis are not a potential hazard. The project site is relatively flat and does not contain any enclosed bodies of water and is not located in close proximity to any other large bodies of water. Therefore, the proposed project would not be subject to inundation by seiches or mudflows. No impacts would occur.
- e. The proposed project would not conflict or obstruct the implementation of the applicable water quality control plan or sustainable groundwater management plan. For additional information see responses X.a through X.c. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XI. <u>LAND USE AND PLANNING</u> . Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

- a. The proposed project consists of the construction and occupancy of an 86-lot residential subdivision. The project site is located at the northwest corner of 60th Street West and Avenue K-12 on vacant land. The proposed project would not block a public street, trail or other access route or result in a physical barrier that would divide the community. Therefore, no impacts would occur.
- b. The proposed project is consistent with the City’s General Plan and must be in conformance with the Lancaster Municipal Code. The proposed project includes a variance for the reduction of lot width, and lot depth development standards. There are reductions of 13 lot depths and seven lot widths. The proposed project with the requested variance lots would be similar to existing single-family homes near the subject site. The existing single-family homes north of the project site have lot widths and lot depths that do not meet the development standards in the R-7,000 zone and the proposed project would be compatibility to the surrounding neighborhood. The proposed project will be in compliance with the City-adopted Uniform Building Code (UBC) and erosion control requirements (Section VII). Additionally, as noted Section IV, the project site is not subject to and would not conflict with a habitat conservation plan or natural communities conservation plan. Therefore, impacts would be less than significant. .

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XII. <u>MINERAL RESOURCES</u> . Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

a-b. The project site does not contain any mining or recovery operations for mineral resources and no such activities are have occurred on the project site in the past. According to the LMEA (Figure 2-4 and page 2-8), the project site is not designated as Mineral Reserve 3 (contains potential but presently unproven resources). Additionally, it is not considered likely that the Lancaster area has large, valuable mineral and aggregate deposits. Therefore, no impacts to mineral resources would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIII. <u>NOISE</u> . Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? (e)			X	

- a. The City’s General Plan (Table 3-1) establishes an outdoor maximum CNEL of 65 dBA for residential uses. Table 8-11 of the LMEA provides the existing roadway noise levels adjacent to the project site. The current noise levels along 60th Street West between Avenue K to Avenue L is 60.9 dBA. This is consistent with the standards of the General Plan. While this noise level is consistent with the standards of the General Plan additional features of the proposed project (e.g., landscaping, block walls, etc.) would ensure that the project remains in compliance with the General Plan. Therefore, potential noise impacts associated with traffic from the proposed development and operational activities would be less than significant.

Construction activities associated with earth-moving equipment and other construction machinery would temporarily increase noise levels for adjacent land uses. Noise sensitive receptors are located adjacent to the project site and construction noise would like be audible at these locations. However, all construction activities would occur in accordance with the City’s noise ordinance with respect to days of the week and time of day and mitigation measures have been identified to reduce the noise generated by construction activities to the extent feasible. With incorporation of these measures, construction noise would still be audible but would not exceed established standards and impacts would be less than significant.

Mitigation Measures

14. Construction operations shall not occur between 8 p.m. and 7 a.m. on weekdays or Saturday or at any time on Sunday. The hours of any construction-related activities shall be restricted to periods and days permitted by local ordinance.
 15. The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
 16. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.
 17. Material stockpiles and mobile equipment staging, parking and maintenance areas shall be located as far away as practicable from noise-sensitive receptors.
 18. The use of noise producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.
 19. No project-related public address or music system shall be audible at any adjacent receptor.
 20. All noise producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factor specifications. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors, etc.) shall be equipped with shrouds and noise control features that are readily available for the type of equipment.
- b. It is not anticipated that the grading of the proposed project would require the use of machinery that generates ground-borne vibration as no major subsurface construction (e.g., parking garage) is planned. No ground mounted industrial-type equipment that generates ground vibration would be utilized once the project is constructed and operational. Therefore, no impacts associated with ground-borne vibration/noise are anticipated.
- c. The project site is not in proximity to an airport or a frequent overflight area and would not experience noise from these sources. Therefore, no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIV. <u>POPULATION AND HOUSING</u> . Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

- a. The proposed project would result in an incremental increase in population growth; however, this increase was anticipated in both the City’s General Plan and in the Southern California Association of Government’s (SCAG’s) most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Additionally, while it is likely that individuals involved in the construction of the proposed project or residing at the proposed project would come from the Antelope Valley any increase in population would contribute, on an incremental basis, to the population of the City. As such, impacts would be less than significant.
- b. The project site is currently vacant. No housing or people would be displaced necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XV. <u>PUBLIC SERVICES.</u>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?			X	
Police Protection?			X	
Schools?			X	
Parks?			X	
Other Public Facilities?			X	

a. The proposed project may increase the need for fire and police services during construction and operation; however, the project site is within the current service area of both these agencies and the additional time and cost to service the sites is minimal. The proposed project would not induce population growth and therefore, would not increase the demand on parks or other public facilities. Therefore, impacts would be less than significant.

Construction of the proposed project may result in an incremental increase in population (see Item XIV) and may increase the number of students in the Westside Union School District and the Antelope Valley Union High School District. Proposition 1A, which governs the way in which school funding is carried out, predetermines by statute that payment of developer fees is adequate mitigation for school impacts. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVI. <u>RECREATION</u> . Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

a-b. The proposed project would generate additional population growth and would contribute on an incremental basis to the use of the existing park and recreational facilities. However, the applicant would be required to pay park fees which would offset the impacts of the existing parks. The development of the proposed project would not require the construction of new recreational facilities or the expansion of existing ones. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVII. <u>TRANSPORTATION</u> . Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	X			
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

- a. The proposed project would not conflict with or impede any of the General Plan policies or specific actions related to alternative modes of transportation (Lancaster General Plan pgs. 5-18 to 5-24.) Therefore, no impacts would occur.
- b. In July 2020, the City of Lancaster adopted standards and thresholds for analyzing projects with respect to vehicle miles traveled (VMT). A series of screening criteria were adopted and if a project meets one of these criteria, a VMT analysis is not required. These criteria are: 1) project site – generates fewer than 110 trips per day; 2) locally serving retail – commercial developments of 50,000 square feet or smaller; 3) project located in a low VMT area – 15% below baseline; 4) transit proximity; 5) affordable housing; and 6) transportation facilities. The proposed project does not meet any of the criteria and exceeds the VMT threshold. A VMT analysis was conducted for the proposed project by Fehr and Peers titled “Lancaster TTM 83232 VMT Analysis Study” and is dated August 20, 2021.

For residential projects in the City of Lancaster, Baseline VMT is defined as a measurement of Home-Based VMT per capita, which reflects all trips that begin or end at a residential unit within the Los Angeles County Antelope Valley Planning Area (Antelope Valley). All home-based auto vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the population within the geographic area to get the efficiency metric of home-based VMT per capita. Following the VMT analysis, the Home-Based VMT per capita of the proposed project was then compared to the Antelope Valley Baseline VMT to determine if it exceeds the City’s impact threshold. Table 5 shows the Home-Based VMT per capita for the proposed project.

Table 5: Project VMT and VMT Threshold for Residential Projects

VMT Metrics for Housing Projects	Home-Based VMT per capita
Project VMT Estimates (2021)	21.6
Antelope Valley Planning Area (AVPA) Baseline VMT (2021)	20.1
Threshold: 15% Below AVPA Baseline VMT	17.1
Percent Higher than VMT Threshold	26%
VMT Exceeds Threshold?	Yes

As shown above, the proposed project generates 21.6 Home-based VMT per capita. In comparison to the City’s threshold of 15% below Baseline VMT, the proposed project is 4.5 Home-based VMT per capita higher and would result in a potential VMT impact. In order to mitigate the project’s VMT impacts, Home-Based VMT per capita needs to be reduced by 26% which equates to a reduction of approximately 1,355 total daily VMT. Current state mitigation guidance provided by the California Air Pollution Control Officers Association caps the maximum possible reduction in VMT at 20% in suburban location. Therefore, the project is unable to fully mitigate the project and a focused EIR is being prepared.

- c. Street improvements are required as part of the conditions of approval and would ensure that traffic flows smoothly in the vicinity of the project site. No hazardous conditions would be created by these improvements. Therefore, no impacts would occur.
- d. The project site would have adequate emergency access from 60th Street West and Avenue K-12. Therefore, no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVIII. <u>TRIBAL CULTURAL RESOURCES</u> . Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or				X
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

- a. No specific tribal cultural resources have been identified either through the sacred lands file search conducted by the Native American Heritage Commission or by any of the Native American tribes with cultural affiliations to the area. Mitigation measures have been requested by the tribes to identify procedures and proper handling of any cultural resources which may be discovered during the course of construction. These mitigation measures have been included in the cultural resources section of this initial study. As such, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction or new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

- a. The proposed project would be required to connect into the existing utilities such as electricity, natural gas, water, wastewater, telecommunications, etc. These services already exist in the general area. Connections would occur on the project site or within existing roadways or right-of-ways. Connections to these utilities are assumed as part of the proposed project and impacts to environmental resources have been discussed throughout the document. As such, impacts would be less than significant.
- b. The Los Angeles County Waterworks District No. 40 has not indicated any problems in supplying water to the proposed project from existing facilities. No new construction of water treatment or new or expanded entitlements would be required. Therefore, water impacts would be less than significant.
- c. The proposed project would discharge directly to the Districts' Avenue J West Trunk Sewer located in Avenue J at 60th Street West. According to the letter dated November 2, 2020 from the

Los Angeles County Sanitation District (LACSD), this 36-inch diameter trunk sewer has a design capacity of 15.9 million gallons per day (mgd) and conveyed a peak flow of 0.3 mgd when last measured in 2018. The project's wastewater would be treated at the Lancaster Water Reclamation Plant upon connection which has a design capacity of 18 mgd and currently processes an average water flow of 14.3 mgd. The expected wastewater flow from the proposed project is 20,800 gallons per day. Therefore, impacts would be less than significant.

- d-e. Solid waste generated within the City limits is generally disposed of at the Lancaster Landfill located at 600 East Avenue F. This landfill is a Class III landfill which accepts agricultural, nonfriable asbestos, construction/demolition waste, contaminated soil, green materials, industrial, inert, mixed municipal, sludge, and waste tires. It does not accept hazardous materials. Assembly Bill (AB) 939 was adopted in 1989 and required a 25% diversion of solid waste from landfills by 1995 and a 50% diversion by 2005. In 2011, AB 341 was passed which requires the State to achieve a 75% reduction in solid waste by 2030. The City of Lancaster also requires all developments to have trash collection services in accordance with City contracts with waste haulers over the life of the proposed project. These collection services would also collect recyclable materials and organics. The trash haulers are required to be in compliance with applicable regulations on solid waste transport and disposal, including waste stream reduction mandated under AB 341.

The proposed project would generate solid waste during construction and operation, which would contribute to an overall impact on landfill service (GPEIR pgs. 5.9-20 to 21); although the project's contribution is considered minimal. However, the existing landfill has capacity to handle the waste generated by the project. Additionally, the proposed project would be in compliance with all State and local regulations regulating solid waste disposal. Therefore, impact would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XX. <u>WILDFIRE</u> . If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impact an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

a. See Item IX.f.

b-d. The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project site is located within the service boundaries of an existing fire station which can adequately serve the project site. Other fire stations are also located in close proximity to the project site which can provide service if needed. Therefore, no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<u>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.</u>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulative considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

a-c. The proposed project consists of the subdivision of approximately 20 acres into 86 individual lots for single family residences in the R-7,000 zone. Other projects have been approved within approximately one mile of the project site (Table 6). These projects are also required to be in accordance with the City's zoning code and General Plan.

Cumulative impacts are the change in the environment, which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable projects.

The proposed project would not create any impacts with respect to: Agriculture and Forest Resources, Energy Resources, Mineral Resources, and Wildfire. The project would create impacts to other resource areas and mitigation measures have identified for Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Hazards and Hazardous Materials, Noise, and Transportation. Many of the impacts generated by projects are site specific and generally do not influence the impacts on another site. All projects undergo environmental review and have required mitigation measures to reduce impacts when warranted. These mitigation measures reduce environmental impacts to less than significant levels whenever possible. All impacts associated with the proposed project are less than significant with the exception of air quality, biological resources, cultural resources, geology and soils (soil erosion),

hazards and hazardous materials, noise and transportation (VMT). Impacts associated with these issues are less than significant with the incorporation of the identified mitigation measures with the exception of VMT. Therefore, the project’s contribution to cumulative impacts would not be cumulatively considerable.

**Table 9
Related Projects List**

Case No.	Project Location	Zone	Number of Lots
Tract No. 39910	SE corner of Ave L & 57th St W.	R-10,000	6
Tract No. 61040	15.1± gr ac SFR subdivision; NW corner of future 55 th St W and future Ave K-14	R-7000	58
Tract No. 61989-01	20.25± gr ac SFR subdivision; SW corner of 67 th St W and Ave L	R-10,000	56
Avanti North Specific Plan TTM 73507 SP15-01	Avenue K, Avenue K-8, 70 th Street West, 60 th Street West	SP 15-01	753
Avanti South Specific Plans TTM74312 SP 15-02 GPA 16-01 DA 18-01 ZC 16-01	62nd Street West, 75 th Street West, Avenue K-8, Avenue L	SP 15-02	1,375 SFH 325 Multi-family units
TTM 61678 CUP 20-05	57th Street West and Avenue K	R-7,000	123
TTM 72532/CUP 06-08	Southeast Corner of 60 th Street West and Avenue L	CPD	10 Commercial parcels and a shopping center
TTM 61920	Northeast Corner of future 55 th Street West and Avenue K	R-10,000 and R-15,000	108
TTM 61600	East of 60 th Street West on the south side of future Avenue K-12	R-7,000	33
TTM 83554	Along 60 th Street West between Avenue K-9 and Avenue K-11	R-7,000	18
TTM 83553	Northwest corner of 52 nd Street West and Avenue L	R-7,000	28

List of Referenced Documents and Available Locations*:

BRR1	Biological Resources Report on APN 3204-008-031, Twenty Acres, 60 th Street West, North of Avenue L, Lancaster, CA, September 2005, Callyn D. Yorke, PhD	DSD
BRR2	Biological Resources report on APN 3204-008-048, 19 Acres, 60 th Street West, North of Avenue L, Lancaster, CA, September 2018	DSD
CRA	Phase I Cultural Resource Investigation for 20 Acres at the Intersection of 60 th Street West and West Avenue K-12, Lancaster Los Angeles County, California, October 2018, RT Factfinders Cultural Resources	DSD
ESA	Environmental Site Assessment - Phase I, Undeveloped Property, 60 th Street West between Avenue K-10 and West Avenue L, APN 3204-008-048, Lancaster, California 93536, October 2018, California Environmental	DSD
FIRM:	Flood Insurance Rate Map	DSD
GPEIR:	Lancaster General Plan Environmental Impact Report	DSD
LACPW:	Los Angeles County Public Works email regarding water, November 3, 2020	DSD
LACSD:	Los Angeles County Sanitation Districts email, November 2, 2020	DSD
LGP:	Lancaster General Plan	DSD
LMC:	Lancaster Municipal Code	DSD
LMEA:	Lancaster Master Environmental Assessment	DSD
SSHZ:	State Seismic Hazard Zone Maps	DSD
TRA	Traffic CEQA Form, August 20, 2021	DSD
USDA SCS:	United States Department of Agriculture Soil Conservation Service Maps	DSD
USGS:	United States Geological Survey Maps	DSD
VMT:	Lancaster TTM 83232 VMT Analysis Study, August 20, 2021, Fehr & Peers	DSD

* DSD: Development Services Department
 Community Development Division
 Lancaster City Hall
 44933 Fern Avenue
 Lancaster, California 93534

Appendix C

VMT TECHNICAL STUDY

Technical Memorandum

Date: August 20, 2021
To: Kris Pinero, Royal Investors Group, LLC
From: Sarah Brandenberg, Biling Liu
Subject: Lancaster TTM 83232 VMT Analysis Study

LA21-3260

Fehr & Peers has completed quantifying Vehicle Miles Traveled (VMT) for the Tentative Tract Map No. 083232 (TTM 83232) housing project (the Project) in the City of Lancaster. The Project is proposing an 86-unit single family residential subdivision on vacant land in the western portion of the City of Lancaster. This assessment compares Home-based VMT per capita generated by the Project to the City's adopted threshold of 15% below Baseline VMT of the Antelope Valley. This VMT analysis is consistent with requirements of Senate Bill 743 (SB 743), the Office of Planning and Research's (OPR's) *Technical Advisory*, and the *City of Lancaster Department of Public Works Traffic Study Guidelines* (October 2020).

The remainder of this memorandum is divided into five sections: Project Introduction, Modeling Methodology, VMT Analysis, and Conclusions.

1. Project Introduction

The Project site is located in the western portion of the City of Lancaster and bounded by approximately 65th Street West to the west, 60th Street West to the east, and Avenue K-12 to the south. The Project proposes 86 single-family dwelling units on a vacant land. **Figure 1** presents the Project site plan.

BENCH MARK

NAVD 88 DATUM BM# L-3328
 RBM TAG IN NE COR CONC BASE OF IREF HYD
 @ SE COR AVE K & 60TH ST W 23 M S & 15 M
 E/O C/L INT
 ELEV 2391.068 FEET LANCASTER QD YR 1998



VICINITY MAP
NTS

UTILITIES

SOUTHERN CALIFORNIA EDISON
 P.O. BOX 4349 42060
 10TH STREET WEST
 LANCASTER, CA 93534
 (661) 945-9327

THE GAS COMPANY
 44416 DIVISION STREET
 (818) 701-2503

LOS ANGELES COUNTY WATERWORKS
 DISTRICT 40, REGION 34
 260 E. AVE. K-8
 LANCASTER, CA 93535
 PHONE (661) 940-5457
 FAX (661) 723-7027

ADELPHIA
 41551 10TH STREET WEST
 PALMDALE, CA 93551
 (661) 947-3130

L.A. COUNTY SEWER MAINT.
 900 SOUTH FREMONT AVE.
 ALHAMBRA, CA 91803
 (818) 458-7182

VERIZON
 P.O. BOX 1929
 LANCASTER, CA 93539
 PHONE (661) 948-4847
 FAX (661) 945-0625

LEGAL DESCRIPTION

THE SOUTH HALF OF THE NORTHEAST QUARTER OF THE
 SOUTHEAST QUARTER OF SECTION 27, TOWNSHIP 7 NORTH,
 RANGE 13 WEST, SAN BERNARDINO MERIDIAN, IN THE CITY OF
 LANCASTER, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA,
 ACCORDING TO THE OFFICIAL PLAT OF SAID LAND.
 APN: 3204 008 043

EASEMENTS

EASEMENTS SHOWN HEREON ARE BASED ON A COPY OF TITLE
 INSURANCE REPORT PROVIDED BY STEWART TITLE OF CALIFORNIA,
 INC. DATED DECEMBER 13, 2005, AS ORDER NO. 330254618. CCL
 ENGINEERING DOES NOT ACCEPT RESPONSIBILITY FOR THE
 COMPLETENESS OR ACCURACY OF THIS INFORMATION PROVIDED
 BY THESE REPORTS.

- ▲ AN EASEMENT FOR PUBLIC ROAD AND HIGHWAY TO COUNTY OF LOS ANGELES IN BOOK 6050 PAGE 297, OF OFFICIAL RECORDS.
- ▲ AN EASEMENT FOR UTILITIES TO SOUTHERN CALIFORNIA EDISON COMPANY, A CORPORATION RECORDED MARCH 18, 1960 AS INSTRUMENT NO. 3446, OF OFFICIAL RECORDS.
- ▲ AN EASEMENT FOR PUBLIC ROAD, HIGHWAY AND UTILITY TO CITY OF LANCASTER RECORDED AUGUST 19, 2005 AS INSTRUMENT NO. 05-1999425, OF OFFICIAL RECORDS.

NOTES

EXISTING CONTOURS WERE TAKEN FROM SURVEY BY SOUTHWEST ENGINEERING

SQUARE FOOTAGE SHOWN INCLUDES ALTERNATE SECTION AREA

THERE ARE NO EXISTING TREES OR STRUCTURES ON THE SITE

THE SITE IS LOCATED IN ZONE B AREAS BETWEEN LIMITS OF THE 100-YEAR FLOOD AND THE 500-YEAR FLOOD; OR CERTAIN AREAS SUBJECT TO 100-YEAR FLOODING WITH AVERAGE DEPTHS LESS THAN ONE(1) FOOT OR WHERE THE CONTRIBUTING DRAINAGE AREA IS LESS THAN ONE SQUARE MILE; OR AREAS PROTECTED BY LEVEES FROM THE BASE FLOOD.

COMMUNITY-PANEL NUMBER 065043 0230 B
 DATED DECEMBER 2, 1980

DEVELOPER

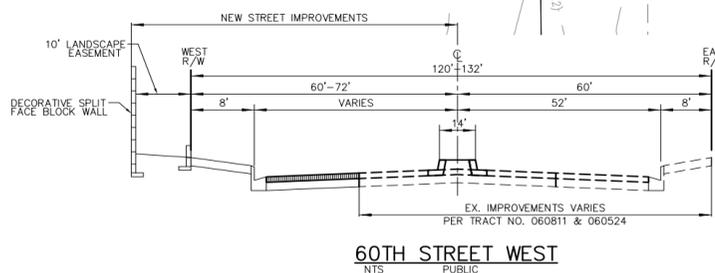
ANDREW PARK
 3453 W 8TH ST
 LOS ANGELES, CA 9005

ENGINEER

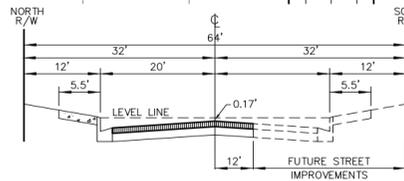
RYAN DUKE
 44732 YUCCA AVENUE
 LANCASTER, CA 93534
 (661) 952-7918

LEGEND

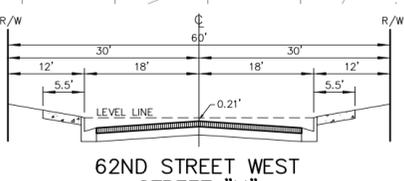
- 35 LOT NUMBER
- XX.X PAD ELEVATION
*ADD 2300' TO ALL ELEVATIONS SHOWN.
- TRACT BOUNDARY
- PROPOSED R/W, WALK, CURB, & GUTTER
- EXISTING R/W, WALK, CURB, & GUTTER
- FUTURE R/W, WALK, CURB, & GUTTER
- EXISTING WATER
- PROPOSED SEWER
- EXISTING SEWER
- PROPOSED WATER
- PROPOSED STORM DRAIN
- PROPOSED CATCH BASIN
- PROPOSED BLOCK WALL



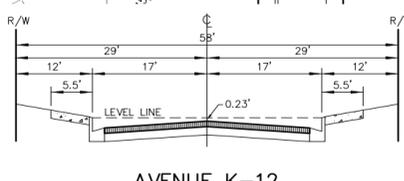
60TH STREET WEST
NTS PUBLIC



AVENUE K-12
NTS (PUBLIC)



**62ND STREET WEST
STREET "M"
STREET "N"
STREET "L"
HAMPTON STREET**
NTS (PUBLIC)



AVENUE K-12
NTS (PUBLIC)

ENGINEER'S STATEMENT OF SIGNATURE

I HEREBY CERTIFY THAT THIS TRACT MAP WAS PREPARED UNDER MY SUPERVISION AND IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND THAT ALL EASEMENTS OF RECORD ARE SHOWN PER TITLE REPORT BY STEWART TITLE OF CALIFORNIA, INC., DATED DECEMBER 13, 2005, ORDER NO. 330254618.

[Signature]
 RYAN DUKE
 RCE NO C079729 6/7/2021
 DATE



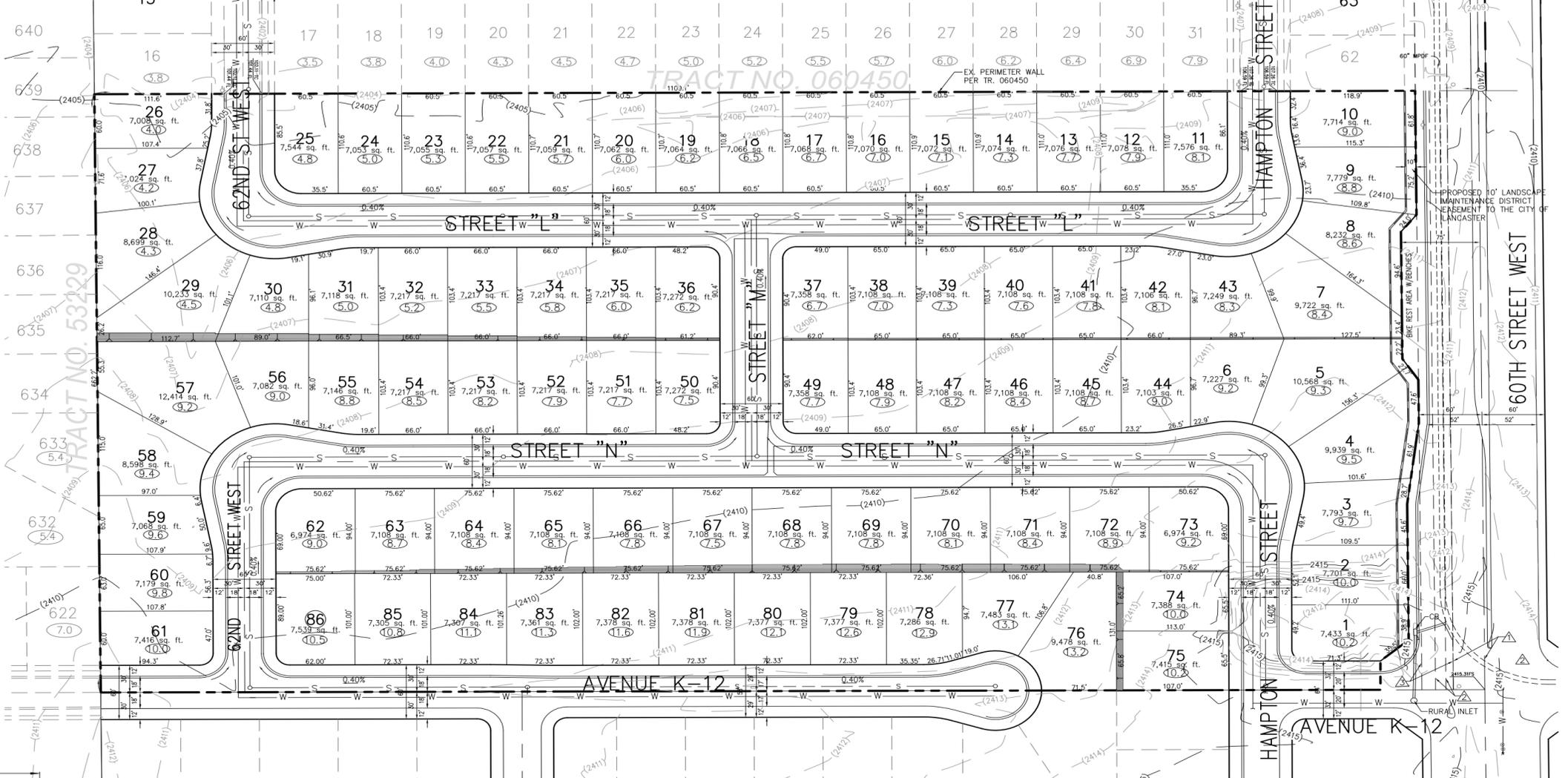
PREPARED FOR:
 ROYAL INVESTORS GROUP, LLC
 9595 WILSHIRE BLVD, SUITE 708
 BEVERLY HILLS, CA 90212



**TENTATIVE TRACT NO. 083232
 CITY OF LANCASTER**

DESIGNED	KM	SCALE	DWG. NAME	SHEET
DRAWN	CV	1"=60'	TTM083232	1 OF 1
CHECKED	RD	DATE	PROJECT NO.	SHEETS
		6/7/2021	TBD	

**TENTATIVE TRACT MAP NO. 083232
 CITY OF LANCASTER**



SCALE: 1"=60'



Figure 1
 Project Site Plan

2. Modeling Methodology

The Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) trip-based model is a travel demand forecasting model with socioeconomic and transportation network inputs, such as population, employment, and the regional and local roadway network, that estimates current travel behavior and forecasts future changes in travel demand. The current SCAG model has 2012 as the base year and 2040 as the forecast year and can be used to estimate VMT for current year 2021 conditions. The 2040 model contains the planned transportation improvements in the RTP and the growth projections in the SCS.

Table 1 presents the socioeconomic inputs for the Project. The Project population was estimated by referring to population per household ratio of Project Transportation Analysis Zone (TAZ) in the SCAG base year model.

Table 1: SCAG Model Land Use Inputs for Project

Land Uses	Households	Population
Proposed Project	86	301

When calculating VMT for a project site, the VMT methodology should match the methodology used to establish the Baseline VMT metrics and impact thresholds. For residential projects in the City of Lancaster, VMT is defined as measurement of Home-Based VMT per capita, which reflects all trips that begin or end at a residential unit within the Los Angeles County Antelope Valley Planning Area (Antelope Valley). All home-based auto vehicle trips are traced back to the residence of the trip-maker (non-home-based trips are excluded) and then divided by the population within the geographic area to get the efficiency metric of home-based VMT per capita.

Following the VMT analysis, the Home-Based VMT per capita of the Project was then compared to the Antelope Valley Baseline VMT to determine if it exceeds the City's impact threshold.

3. VMT Analysis

The Home-Based VMT per capita of the Project was calculated for existing year (2021) using the SCAG travel demand model. While the Project will be built over time, the Year 2021 analysis shows how the VMT generated by the Project compares to current travel and VMT characteristics in the area. **Table 2** shows the Home-Based VMT per capita of the Project.

Table 2: Project VMT and VMT Threshold for Residential Project in Lancaster

VMT Metrics for Housing Projects	Home-Based VMT per capita
Project VMT Estimates (2021)	21.6
Antelope Valley Planning Area (AVPA) Baseline VMT (2021)	20.1
Threshold: 15% Below AVPA Baseline VMT	17.1
Project Higher than VMT Threshold	26%
VMT Impact?	Yes

As shown above, the Project generates 21.6 Home-based VMT per capita. In comparison to the City's threshold of 15% below Baseline VMT of the Antelope Valley, the Project is 4.5 Home-based VMT per capita higher and will result in a VMT impact. The higher VMT results is due to the location of the Project in the western area of Lancaster with lower development densities that can result in longer travel distance in comparison to the broader Antelope Valley area.

In order to mitigate the Project's VMT impacts, Home-based VMT per capita needs to be reduced by 26% which equates to a reduction of approximately 1,355 total daily VMT. Current state mitigation guidance provided by the California Air Pollution Control Officers Association (CAPCOA)¹ caps the maximum possible reduction in VMT at 20% in suburban locations. Therefore, the Project is unable to fully mitigate the residential VMT impact.

4. Conclusions

This technical memorandum documents the process to determine the potential VMT impacts of the proposed residential project in the City of Lancaster. The following summarizes the results of the VMT analysis:

- The VMT analysis for the Project is based on the City's new guidance for transportation impacts. The VMT analysis methodology for the Project is consistent with the methodology used to establish the Baseline VMT metrics and impact thresholds for projects in the City of Lancaster.
- For residential projects in the City of Lancaster, the Home-Based VMT per capita is analyzed to determine the VMT impact.
- The Home-Based VMT per capita generated by the Project under base year (2021) was compared to the Antelope Valley Baseline VMT.

¹ Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Access Emission Reductions from Greenhouse Gas Mitigation Measures (CAPCOA, 2010)

- The Project generates 21.6 Home-based VMT per capita in the base year (2021) which is 26% higher than the City's threshold. Therefore, the Project will result in a VMT impact.
- According to current mitigation guidance provided by CAPCOA, the maximum possible reduction in VMT is 20% in suburban locations; therefore, the Project is unable to fully mitigate the expected residential VMT impacts.