11.3 Cultural and Paleontological Resources Assessment/AB 52 Documentation

The following technical studies may contain references to or impact analyses related to the development of a cannabis facility within the proposed overlay zone. This component of the project has since been removed and is no longer proposed as part of the project. All cannabis-related uses and activities have been removed from the project. Refer to Draft EIR Section 2.3, *Notice of Preparation/Early Consultation (Scoping)*, for additional information.

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JN 188637

CULTURAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT

Lancaster Eastside Project
Lancaster, Los Angeles County, California

Prepared for:
City of Lancaster
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Lancaster, CA 93534

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July 2022

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1 MANAGEMENT SUMMARY

The City of Lancaster (City) proposes a two-component project consisting of 1) the development of a Light Industrial Overlay Zone (Overlay Zone) in the eastern portion of Lancaster and 2) the development of a cannabis facility (Cannabis Facility) with the proposed Overlay Zone (project). Component 1 of the project consists of the establishment of an Overlay Zone in the eastern portion of Lancaster over the predominantly RR-2.5 (Rural Residential, 1 dwelling unit per acre [du/ac]) zoned area. Anticipated allowed light industrial uses include those currently allowed under the Light Industrial (LI) zoned areas under Municipal Code Section 17.16.040, *Permitted Uses – I Zones*, as well as commercial cannabis activity development potential in the underutilized eastern portion of Lancaster. Component 2 consists of the development of a Cannabis Facility at 43200 40th Street East (assessor's parcel number [APN] 3170-012-002) within the proposed Overlay Zone. The site is approximately 480 acres and would have a maximum buildout of 200,000 square feet. The proposed Cannabis Facility would include cultivation, manufacturing, distribution, and retail delivery activities. Grow areas would occur in hoop houses; traditional tractors and agricultural farming equipment would be utilized on-site. The project is an action regulated by the California Environmental Quality Act (CEQA), and an environmental impact report (EIR) is being prepared for the project. The City is the lead agency.

This study consists of a desktop analysis of the Overlay Zone, and an intensive analysis of the Cannabis Facility site. It includes background and archival research; a Natural History Museum of Los Angeles County (NHMLAC) and other paleontological records searches; a South Coastal Central Information Center (SCCIC) records search; a Native American Heritage Commission (NAHC) Sacred Lands File search; historical society consultation; an archaeological and built environment field survey; California Register of Historical Resources (California Register, CRHR) evaluation of two resources; and impacts analysis. These efforts were completed to determine whether the project could result in significant impacts to historical and archaeological resources as defined by CEQA Section 15064.5.

Based on the results of the study, the Overlay Zone has a low potential to disturb paleontological resources within undisturbed bedrock, with sensitivity increasing with depth. The SCCIC records search, literature review, and interested parties consultation identified seven historic-period archaeological sites (**Table MS-1**) and six assessor parcels with documented historic-aged buildings (**Table MS-2**) located within the Overlay Zone. If future proposed projects have the potential to impact these or other resources, they will require evaluation for inclusion in the California Register and/or National Register of Historic Places (National Register, NRHP). Further, a Phase I cultural resources study will be required for each project to identify potential unknown resources that may be impacted by the proposed project.

TABLE MS-1: ARCHAEOLOGICAL SITES WITHIN THE PROJECT SITE

Primary Number	Permanent Trinomial	Description	Evaluation Status	Location within Project Site
P-19-003696	CA-LAN-3696	Can and bottle scatter	Unevaluated	Overlay Zone
P-19-003817	CA-LAN-003817H	Can and bottle dumps and borrow pit	Unevaluated	Overlay Zone
P-19-004157	CA-LAN-004157H	Foundation slabs, irrigation standpipes, pumphouse, domestic trees, fence lines, fallow agricultural fields, and refuse deposits associated with abandoned farmstead	Unevaluated	Overlay Zone
P-19-120054	None	Well, irrigation system, and refuse deposits	Unevaluated	Overlay Zone
P-19-120056	None	One obsidian flake and associated clam shell fragments	Unevaluated	Overlay Zone
P-19-120057	None	"Historic complex" including refuse deposit	Unevaluated	Overlay Zone
Pending	Pending	MBI-001H refuse deposit	Not eligible	Cannabis Facility

TABLE MS-2: ASSESSOR PARCELS WITH DOCUMENTED HISTORIC-AGED STRUCTURES

APN	Address	Construction Date	Eligibility	Location within Project Site
3386-012-006	7166 East Avenue K	1930	Unevaluated	Overlay Zone
3384-017-001	6001 East Avenue K	1932	Unevaluated	Overlay Zone
3378-002-006	8717 East Avenue L	1933	Unevaluated	Overlay Zone
3376-026-002	9847 East Avenue K	1846*	Unevaluated	Overlay Zone
3170-012-002	43200 40th Street E	1964	Not eligible	Cannabis Facility
3150-016-018	4566 East Avenue J	1947	Unevaluated	Overlay Zone

*Date is incorrect and the accurate built date is currently unknown.

The Cannabis Facility has a high potential to disturb paleontological resources within undisturbed bedrock. Significant vertebrate fossil localities have been recovered from geologic formations of similar age and depositional environments within 10 miles of the Cannabis Facility. The SCCIC records search, literature review, interested parties consultation, and pedestrian surveys identified one archaeological resource (MBI-001H) and one built environment resource (43200 40th Street East) (**Table MS-3**). These resources do not appear to meet the definition of historical resources as defined by Public Resources Code (PRC) Section 5020.1(j), nor do they appear to meet the criteria for listing on the California Register (14 California Code of Regulations [CCR] Section 4850), nor do they appear to meet the definition of a "unique archeological resource" as defined in PRC Section 21083.2. As such, no further work is recommended for these resources. There are no historical resources identified within the Cannabis Facility site.

TABLE MS-3: CULTURAL RESOURCES WITHIN THE CANNABIS FACILITY SITE

Resource Name	Description	California Register Evaluation	Historical Resource
MBI-001H	Refuse scatter	Ineligible	No
43200 40th Street East	Farm property	Ineligible	No

By following the recommended mitigation measures CUL-3 and PALEO-1, 2, 3, and 4, impacts to cultural and paleontological resources within the Overlay Zone would be less than significant with mitigation incorporated.

By following the recommended mitigation measures CUL-1 and CUL-2 and PALEO-1, 2, 3, and 4, impacts to cultural and paleontological resources within the Cannabis Facility site would be less than significant with mitigation incorporated.

2 INTRODUCTION

2.1 PROJECT LOCATION

The City is located in northern Los Angeles County, approximately 70 miles north of downtown Los Angeles (**Figure 1**). The City and its sphere of influence consist of 94.54 square miles. Unincorporated Los Angeles County surrounds the City on all sides with unincorporated Kern County farther north and Palmdale south. The Antelope Valley Freeway State Route 14 traverses the City in a north–south orientation.

The project site consists of two components within the eastern portion of Lancaster: 1) an approximately 5,841-acre area identified as the Overlay Zone, and 2) a 480-acre area within the Overlay Zone identified as the proposed Cannabis Facility site. The Overlay Zone and proposed Cannabis Facility site together make up the "project site."

The Overlay Zone is generally bound by Avenue J to the north, 110th Street East to the east, Avenue L to the south, and 40th Street East to the west. The proposed Cannabis Facility is located within the Overlay Zone at 43200 40th Street East and is an L-shaped parcel (APN 3170-012-002) generally bound by Avenue K to the north, 50th Street East to the east, Avenue L to the south, and 40th Street East to the west.

2.2 PROJECT CHARACTERISTICS

The project consists of two components:

- 1) development of a Light Industrial Overlay Zone (Overlay Zone) in the eastern portion of Lancaster (**Figure 2**); and
- 2) development of a Cannabis Facility within the proposed Overlay Zone (**Figure 3**).

The two project components are described in further detail below.

The project is an action regulated by the CEQA, and an EIR is being prepared for the project. The City is the lead agency.

Light Industrial Overlay Zone

The City is proposing to establish an Overlay Zone in the eastern portion of Lancaster over the predominantly RR-2.5 (Rural Residential, 1 du/ac) zoned project site. Anticipated allowed light industrial uses would include, but are not limited to, alternative energy, commercial cannabis activity, distribution, light manufacturing, research and development, and warehousing. The intent of the Overlay Zone is to allow more flexibility and development potential in the underutilized eastern portion of Lancaster.

This portion of the project will not immediately result in ground disturbance. As a result, the Overlay Zone will not be analyzed at a project level of detail in this document or the EIR.

Cannabis Facility

A project Applicant is proposing to develop a Cannabis Facility at 43200 40th Street East (APN 3170-012-002) within the proposed Overlay Zone. The site is approximately 480 acres and would have a maximum

buildout of 200,000 square feet. The proposed Cannabis Facility would include cultivation, manufacturing, distribution, and retail delivery activities. Grow areas would occur in hoop houses; traditional tractors and agricultural farming equipment would be utilized on-site.

The Cannabis Facility is the only site-specific cannabis facility to be analyzed at a project level of detail in the EIR. Additional future proposed cannabis facilities within the Overlay Zone would be analyzed under a separate, stand-alone CEQA document at the time such development application(s) are received.

Project Location

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

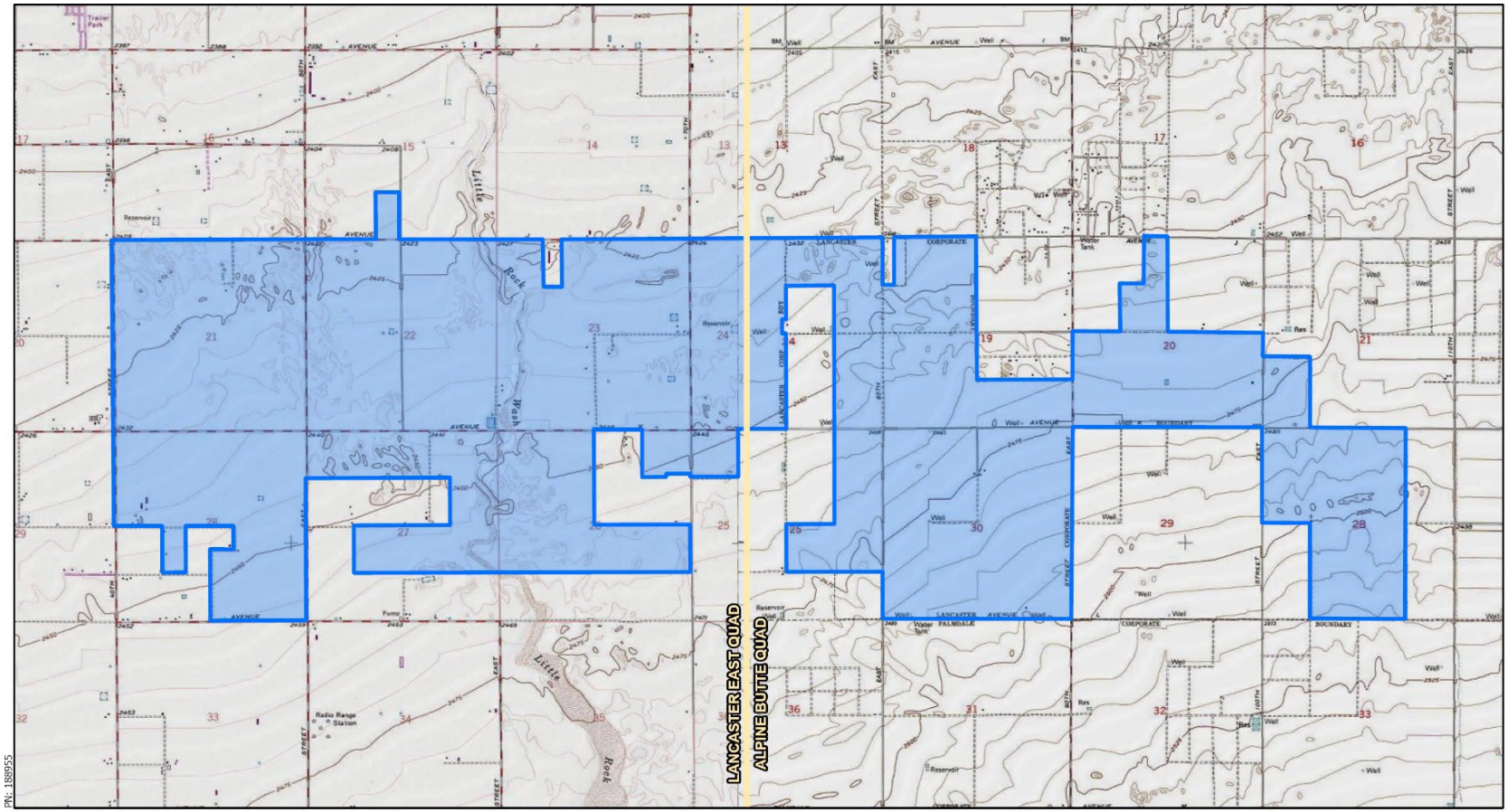
N

0 2.5 5 10 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Lancaster, California*

Regional Vicinity

Figure 1



Light Industrial Overlay Zone

LANCASTER EAST / ALPINE BUTTE USGS 7.5-MINUTE TOPO QUAD

Michael Baker INTERNATIONAL

N

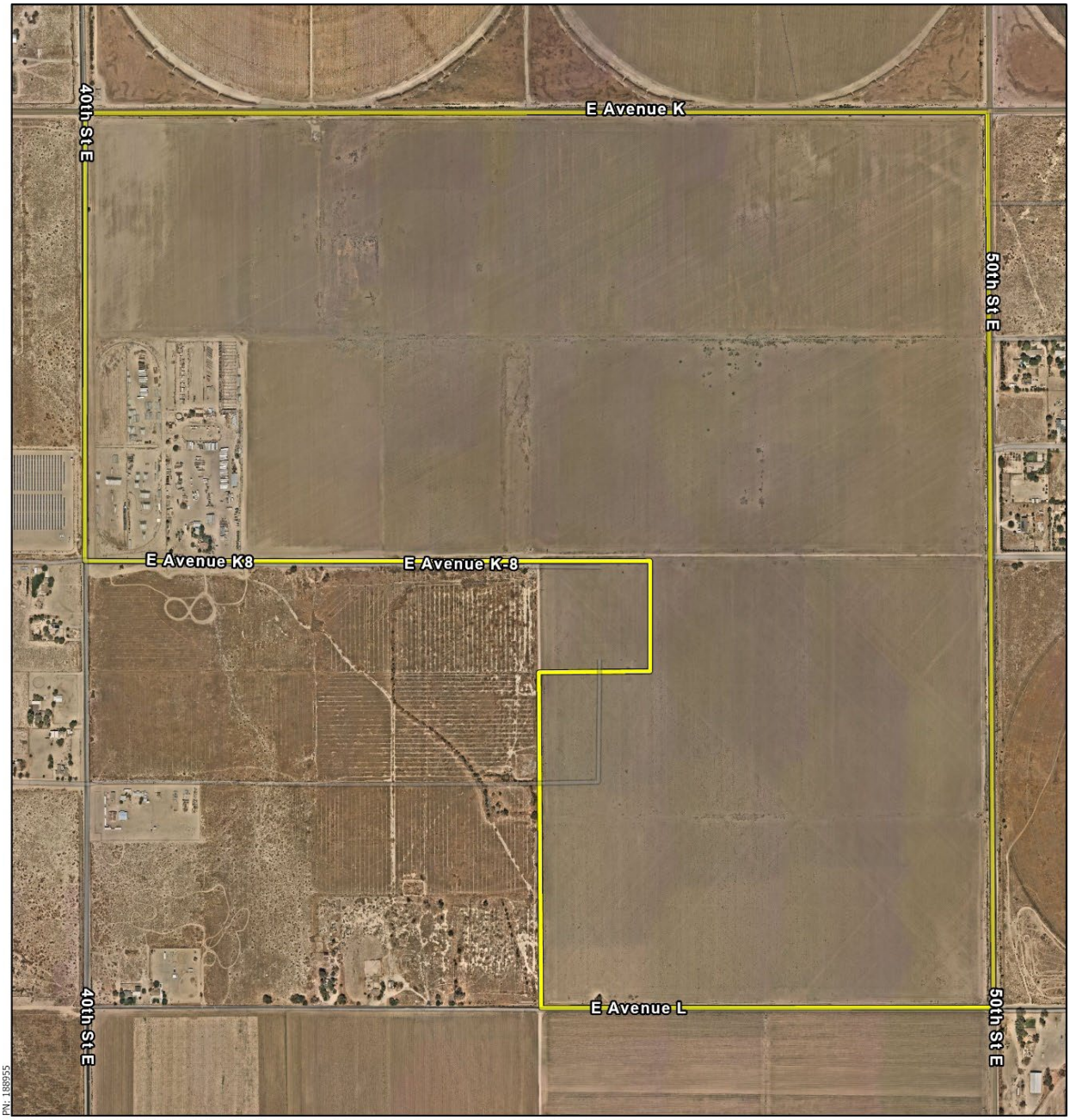
0 0.25 0.5 1 Miles

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Lancaster, California*

LANCASTER EAST SIDE PROJECT

Light Industrial Overlay Zone

Figure 2



Cannabis Facility

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

N

0 250 500 1,000 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Lancaster, California*

Cannabis Facility

Figure 3

3 REGULATORY FRAMEWORK

3.1 NATIONAL HISTORIC PRESERVATION ACT

Federal undertakings are subject to Section 106 of the National Historic Preservation Act (NHPA). The NHPA dictates that it is necessary to identify, evaluate, and mitigate effects to historic properties within the area of potential effects (APE) of proposed undertakings as defined by 36 Code of Federal Regulations (CFR) 800.16(y). The NHPA defines a historic property as any "prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on, the National Register of Historic Places, including artifacts, records, and material remains related to such a property or resource" (54 United States Code Section 300308).

National Register of Historic Places

The National Register is the official register of districts, sites, buildings, structures, and objects determined to be worth special protections due to their historic or artistic significance. The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

A. that are associated with events that have made a significant contribution to the broad patterns of our history; or

B. that are associated with the lives of persons significant in our past; or

C. that embody the distinctive characteristics of a 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; or

D. that have yielded, or may be likely to yield, information important in prehistory or history.

All resources or properties nominated for listing in the NRHP must retain integrity, which is the authenticity of a historic resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for nomination.

3.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies (CCR Title 14[3] Section 15002[i]). CEQA conditions that it is the policy of the state of California to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of the major periods of California history" (PRC Section 21001[b], [c]). Under the provisions of CEQA, "a project with an effect 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" (CCR Title 14[3] Section 15064.5[b]).

CEQA Guidelines Section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register.
- Listed in a local register of historical resources (as defined in PRC Section 5020.1[k]).
- Identified as significant in a historical resource survey meeting PRC Section 5024.1(g) requirements.
- Determined to be a historical resource by a project's lead agency (CCR Title 14[3] Section 15064.5[a]).

A historical resource consists of "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (CCR Title 14[3] Section 15064.5[a][3]).

The CEQA planning process requires considering historical resources and unique archaeological resources (CCR Title 14[3] Section 15064.5; PRC Section 21083.2). If feasible, adverse effects to the significance of historical resources must be avoided or mitigated (CCR Title 14[3] Section 15064.5[b][4]). The significance of a historical resource is impaired when a project demolishes or materially alters adversely those physical characteristics of a historical resource that convey its historical significance and justify its eligibility for the California Register. If there is a substantial adverse change in the significance of a historical resource, the preparation of an EIR may be required (CCR Title 14[3] Section 15065[a]).

If the cultural resource in question is an archaeological site, CEQA (CCR Title 14[3] Section 15064.5[c][1]) requires that the lead agency first determine if the site is a historical resource as defined in CCR Title 14(3) Section 15064.5(a). If the site qualifies as a historical resource, potential adverse impacts must be considered in the same manner as a historical resource (OHP 2001a). If the archaeological site does not qualify as a historical resource but does qualify as a unique archaeological site, then the archaeological site is treated in accordance with PRC Section 21083.2 (CCR Title 14[3] Section 15069.5[c][3]). In practice, most archaeological sites that meet the definition of a unique archaeological resource will also meet the definition of a historical resource. CEQA defines a "unique archaeological resource" as an archaeological artifact, object, or site about which it can be demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets one or more of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2[g]).

If an impact to a historical or archaeological resource is significant, CEQA requires feasible mitigation measures to minimize the impact (CCR Title 14[3] Section 15126.4[a][1]). Mitigation must lessen or eliminate the physical impact that the project will have on the resource. Generally, drawings, photographs, and/or displays do not mitigate the physical impact on the environment caused by the demolition or the destruction of a historical resource. However, CEQA (PRC Section 21002.1[b]) requires that all feasible mitigation be undertaken even if it does not mitigate impacts to a less than significant level (OHP 2001a:9).

California Register of Historical Resources

The California Register is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The California Register helps government agencies identify and evaluate California's historical resources (OHP 2001b:1) and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). Any resource listed in, or eligible for listing in, the California Register is to be considered during the CEQA process (OHP 2001a:7).

A cultural resource is evaluated under four California Register criteria to determine its historical significance. A resource must be significant in accordance with one or more of the following criteria:

- Criterion 1: Is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage.
- Criterion 2: Is associated with the lives of persons important in our past.
- Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history.

Age

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time must have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource (OHP 2006:3). The OHP recommends documenting, and taking into consideration in the planning process, any cultural resource that is 45 years or older (OHP 1995:2).

Period of Significance

The period of significance for a property is "the length of time when a property was associated with important events, activities, persons, or attained the characteristics which qualify it for National Register listing" (NPS 1997:42). The period of significance begins with the date of the earliest important land use or activity that is reflected by historic characteristics tangible today. The period closes with the date when events having historical importance ended. The period of significance for an archaeological property is

"the broad span of time about which the site or district is likely to provide information" (NPS 1997:42). Archaeological properties may have more than one period of significance.

Historic Context

The significance of cultural resources is generally evaluated using a historic context that groups information about related historical resources based on theme, geographic limits, and chronological period (OHP 1995:11).

Integrity

The California Register also requires a resource to possess integrity, which is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association" (OHP 2006:2).

Archaeologists use the term "integrity" to describe the level of preservation or quality of information contained within a district, site, or excavated assemblage. Integrity is relative to the specific significance that the resource conveys. Although it is possible to correlate the seven aspects of integrity with standard archaeological site characteristics, those aspects are often unclear for evaluating the ability of an archaeological resource to convey significance under Criterion 4. The integrity of archaeological resources is judged according to the site's ability to yield scientific and cultural information that can be used to address important research questions (NPS 1997:44–49).

Eligibility

Resources that are significant, meet the age guidelines, and possess integrity are considered eligible for listing in the California Register.

Paleontological Resources

Paleontological resources are the fossilized remains, imprints, or traces of past life preserved in the geologic record. These resources include bones, teeth, soft tissues, shells, plant material, microscopic organisms, footprints, trackways, and burrows. Fossils record the natural history of life on Earth. Despite the frequency of sedimentary rock in the geologic record and the number of organisms that have lived throughout the planet's history, only a minimal number of remains have been preserved in the fossil record.

Paleontological resources are afforded protection by CEQA environmental legislation. Appendix G (part V) of the CEQA Guidelines explains significant impacts on paleontological resources. It details that a project would significantly impact paleontological resources if it disturbs or destroys unique paleontological resources or a unique geologic feature. Additionally, PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Penalties for this removal or damage of paleontological resources are set forth in California Penal Code Section 622.5.

3.3 CALIFORNIA PUBLIC RESOURCES CODE SECTION 5097.5

PRC Section 5097.5 prohibits excavation or removal of any "vertebrate paleontological site or any other archaeological, paleontological or historical feature, situated on public lands, except with express permission of the public agency having jurisdiction over such lands." Public lands are defined to include lands owned by or under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Section 5097.5 states that any unauthorized disturbance or removal of archaeological, historical, or paleontological materials or sites located on public lands is a misdemeanor.

3.4 CALIFORNIA HEALTH AND SAFETY CODE SECTION 7050.5

California Health and Safety Code Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify a Native American most likely descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

3.5 CITY OF LANCASTER GENERAL PLAN 2030

The City of Lancaster General Plan 2030 Plan for Active Living includes goals, objectives, policies, and specific actions designed to protect and conserve historic and archaeological resources. Policies that apply to the proposed project are listed below:

- **Goal 12**: To promote community appreciation for the unique history of the Antelope Valley and the City of Lancaster and to promote community involvement in the protection, preservation, and restoration of the area's significant cultural, historical, or architectural features.
- **Objective 12.1**: Identify and preserve and/or restore those features of cultural, historical, or architectural significance.
- **Policy 12.1.1**: Preserve features and sites of significant historical and cultural value consistent with their intrinsic and scientific values.
- **Specific Action 12.1.1(a)**: As part of the CEQA review process, require site-specific historical, archaeological, and/or paleontological studies when there exists a possibility that significant environmental impacts might result or when there is a lack of sufficient documentation on which to determine potential impacts.
- **Specific Action 12.1.1(b)**: Include a condition of approval on all development projects that addresses State and Federal regulations with respect to the disposition of cultural resources.
- **Specific Action 12.1.1(c)**: Process requests for inclusion in state and federal historic registers those historic and prehistoric sites and features which meet state or federal criteria.

- **Specific Action 12.1.1(d)**: Prior to permitting demolition of any historic structure, require that an evaluation of the condition of the structure, potential adaptive reuse of the structure, and the cost of rehabilitation be undertaken.
- **Policy 19.3.4**: Preserve and protect important areas of historic and cultural interest that serve as visible reminders of the City's social and architectural history.
- **Specific Action 19.3.4(a)**: Through the development review process, apply Community Design guidelines that incorporate site-sensitive building design techniques into developments that shall integrate harmoniously into the community to preserve areas of historic and cultural interest.

4 PROJECT SETTING

4.1 GEOLOGICAL SETTING

Eleven geomorphic provinces divide California, each defined by unique geologic and geomorphic characteristics. The project is in the western point of the Mojave Desert geomorphic province, an area marked with mountain ranges and hills of varying orientation separated by broad alluvial basins, whereas the eastern portion of the province contains horst and graben terrain that continues east as the Basin and Range province of adjacent states (DeCourten 2010). The San Andreas and Garlock faults, and adjacent mountain ranges, e.g., the Tehachapi Mountains, define the western border of the Mojave Desert province. This province is bordered to the north by the Sierra Nevada and Basin and Range geomorphic provinces, west by the Transverse Ranges province, south by the Colorado Desert province, and to the east by the Colorado River (CGS 2002).

The western Mojave Desert contains sedimentary (lake and river sourced) and volcanic rocks, ranging from Cenozoic to Quaternary deposition (Dibblee 1967; DeCourten 2010). The Mojave block is a tectonic region in the western Mojave Desert defined by the nearby San Andreas and Garlock faults, with several accessory faults trending northwest that were active throughout the Quaternary Period (Dibblee 1967).

The geology of the Lancaster area was mapped by Ponti and Burke (1980) and Dibblee and Minch (2008) at a scale of 1:62,500 and by Lancaster (2011) at a scale of 1:24,000. Geologic units underlying the project site are mapped as alluvial deposits (Qa) and eolian deposits (Qs) (Dibblee and Minch 2008). Subsequent authors (Lancaster 2011) mapped the Lancaster East 7.5' quadrangle (containing the western half of the project area to 70th Street East) and further subdivided the alluvial deposits by age (Qf_1, Qa, and Qyf). The oldest of these units (Qyf: younger alluvial fan deposits) consists of unconsolidated to weakly consolidated sands and gravels dating from Holocene to late Pleistocene epochs (present to 126,000 years old). A similar detailed map for the area of Lancaster east of 70th Street East, i.e., containing the eastern portion of the project area, has not been published yet and subsequent recommendations for this part of the project must be made based on the larger map, i.e., Dibblee and Minch (2008).

The soil in the project site has been mapped as 15 distinct soil map units (NRCS 2022). Hesperia series units (HgA and HkA; Xeric Torriorthents) and Rosamond series units (Ro and Rp; Typic Torrifluvents) are the most common soils of the project site, each composing at least 10 percent of the observed surface (USDA 1997a, 1997b). Xeric Torriorthents are a subgroup of coarse loamy soils that retain moisture for over 25 percent of the time when subsurface temperatures are above 5°C (USDA 2010). Typic Torrifluvents are a subgroup of fine loamy soils that lack a water table within 150 centimeters of depth, resulting in a dry pedon (USDA 2010).

The project site is within the Western Mojave Basins ecoregion, which includes alluvial fans and plains resulting from the drainage of nearby valleys and mountain ranges. This ecoregion receives little summer rainfall, and the vegetation is dominated by creosote bush and white bursage. Soil temperatures in this region are thermic and soil moisture is aridic (Griffith et al. 2016).

4.2 ENVIRONMENTAL SETTING

The project site is located in the western Antelope Valley. Surrounded by the Tehachapi, Sierra Paloma, and San Gabriel Mountains, the Antelope Valley is the western tip of the Mojave Desert. The project site is located on a relatively flat alluvial plain, overlain in places with aeolian deposits. Summers are hot, arid, and clear, and winters are cold and partly cloudy. The average annual rainfall is just 7.7 inches.

At an altitude of approximately 2,359 feet above mean sea level (amsl), Lancaster is located in C. Hart Merriam's Lower Sonoran Life Zone. This low elevation, hot desert life zone is dominated by plants which can survive the arid environment, including creosote bush, desert shrubs, Joshua trees, and other succulents. Animals found in the Antelope Valley include the pronghorn antelope, which gives the valley its name, jackrabbits, pocket gophers, and various reptiles.

The natural surface water in the project site is limited to seasonal creeks, streams, and washes. One named ephemeral creek, Little Rock Creek, runs north-south through the eastern part of the Overlay Zone, but east of the Cannabis Facility site.

4.3 CULTURAL SETTING

Unless otherwise noted, this section has been adapted from "Cultural Resources Assessment, Baldy Mesa Solar Project, Adelanto, San Bernardino County, California" (BCR Consulting 2019). Both the Baldy Mesa Solar Project and the Lancaster Eastside Project are located in the western Mojave Desert, and the two project locations share a similar prehistoric and historic background.

The prehistoric cultural setting of the Mojave Desert has been organized into many chronological frameworks. Mojave chronologies have relied upon temporally diagnostic artifacts, such as projectile points, or upon the presence/absence of other temporal indicators, such as ground stone. Five prehistoric periods are proposed for the western Mojave area.

Paleoindian (12,000 to 10,000 before present [BP]) and Lake Mojave (10,000 to 7,000 BP) Periods. Climatic warming characterizes the transition from the Paleoindian period to the Lake Mojave period. This transition also marked the end of Pleistocene epoch and ushered in the Holocene. The Paleoindian period has been loosely defined by isolated fluted (such as Clovis) projectile points, dated by their association with similar artifacts discovered in situ in the Great Plains. Some fluted bifaces have been found in association with fossil remains of Rancholabrean mammals near China Lake in the northern Mojave Desert, and dated to ca. 13,300-10,800 BP. The Lake Mojave period has been associated with cultural adaptations to moist conditions, and resource allocation pointing to more lacustrine environments. Artifacts that characterize this period include stemmed points, flake and core scrapers, choppers, hammerstones, and crescentics. Projectile points associated with the period include the Silver Lake and Lake Mojave styles. Lake Mojave sites commonly occur on shorelines of Pleistocene lakes and streams, where geological surfaces of that epoch have been identified.

Pinto Period (7,000 to 4,000 BP). The Pinto period has been largely characterized by desiccation of the Mojave. As formerly rich lacustrine environments began to disappear, the artifact record reveals more sporadic occupation of the Mojave, indicating occupants' recession into the cooler, moister fringes. Pinto period sites are rare, characterized by surface manifestations that usually lack significant in situ remains.

Artifacts from this era include Pinto projectile points and a flake industry similar to the Lake Mojave tool complex, though use of Pinto projectile points as an index artifact for the era has been disputed. Milling stones have also occasionally been associated with sites of this period.

Gypsum Period (4,000 to 1,500 BP). A temporary return to moister conditions during the Gypsum period is postulated to have encouraged technological diversification afforded by the relative abundance of resources. Lacustrine environments reappear and begin to be exploited during this era. Concurrently, a more diverse artifact assemblage reflects intensified reliance on plant resources. The new artifacts include milling stones, mortars, pestles, and a proliferation of Humboldt Concave Base, Gypsum Cave, Elko Eared, and Elko Corner-notched dart points. Other artifacts include leaf-shaped projectile points, rectangular-based knives, drills, large scraper planes, choppers, hammer stones, shaft straighteners, incised stone pendants, and drilled slate tubes. The bow and arrow appears around 2,000 BP, evidenced by the presence of a smaller type of projectile point, the Rose Spring point.

Saratoga Springs Period (1,500 to 800 BP). During the Saratoga Springs period, regional cultural diversifications of Gypsum period developments are evident within the Mojave. Basketmaker III (Anasazi) pottery appears during this period, and has been associated with turquoise mining in the eastern Mojave Desert. Influences from Patayan/Yuman assemblages are apparent in the southern Mojave, including the appearance of buff and brown wares often associated with Cottonwood and Desert Side-notched projectile points. Obsidian becomes more commonly used throughout the Mojave and characteristic artifacts of the period include milling stones, mortars, pestles, ceramics, and ornamental and ritual objects. More structured settlement patterns are evidenced by the presence of large villages, and three types of identifiable archaeological sites (major habitation, temporary camps, and processing stations) emerge. Diversity of resource exploitation continues to expand, indicating a much more generalized, somewhat less mobile subsistence strategy.

Shoshonean Period (800 BP to Contact). The Shoshonean period is the first to benefit from contact-era ethnography, as well as being subject to its inherent biases. Interviews of living informants allowed anthropologists to match artifact assemblages and particular traditions with linguistic groups and plot them geographically. During the Shoshonean period, continued diversification of site assemblages and reduced Anasazi influence both coincide with the expansion of Numic (Uto-Aztecan language family) speakers across the Great Basin, Takic (Uto-Aztecan language family) speakers into southern California, and the Hopi across the southwest. Hunting and gathering continued to diversify, and the diagnostic arrow points include Desert Side-notched and Cottonwood Triangular varieties. Ceramics continue to proliferate, though are more common in the southern Mojave during this period. Trade routes have become well established across the Mojave, particularly the Mojave Trail, which transported goods and news across the desert via the Mojave River. Trade in the western Mojave was more closely related to coastal groups.

4.4 ETHNOGRAPHY

Ethnographically, the project site is within the Serrano territory.

The Uto-Aztecan “Serrano” people occupied the western Mojave Desert periphery. The term “Serrano” is generally applied to four groups, each with distinct territories: the Kitanemuk, Tataviam, Vanyume, and

Serrano. Only one group, in the San Bernardino Mountains and west-central Mojave Desert, ethnically claims the term Serrano. "The Serrano resided in an area that extended east of the Cajon Pass, located in the San Bernardino Mountains, to Twenty-nine Palms, the north foothills of the San Bernardino Mountains and south to include portions of the Yucaipa Valley" (Bean and Smith 1978:570). Both the Serrano and Cahuilla utilized the western Mojave region seasonally.

Evidence for longer-term/permanent Serrano settlement in the western Mojave most notably includes the Serrano-named village of Guapiabit in Summit Valley. Access to water determined where the Serrano built their settlements/villages. Most of the villages were located within the Sonoran life zone (scrub oak [*Quercus sp.*] and sagebrush [*Salvia sp.*]) or forest transition zone (Ponderosa pine [*Pinus ponderosa*]). Like many neighboring tribes, the Serrano and Cahuilla were Takic (Uto-Aztecan language family) speakers. Serrano traded with their neighbors and actively participated in a shell bead exchange economy with the Cahuilla, Luiseño, and Gabrielino. Occasionally, villages were located in the desert, adjacent to permanent water sources.

Structures for families were usually circular domes, constructed of willow frames and tule thatching. Individual family homes were used primarily for sleeping and storage. Families conducted many of their daily routines outside of their house or under a ramada. A ramada consisted of a thatched roof supported by vertical poles in the ground, which provided a shaded work area. Other village structures included a ceremonial house, granaries, and sweathouses. Subsistence strategies focused on hunting and gathering, occasionally supplemented by fishing. Food preparation varied and included a variety of cooking techniques. These ranged from baking in earth ovens to parching. Food processing utilities included scrapers, bowls, baskets, mortars, and metates. A lineage leader, or kika, administered laws and ceremonies from a large ceremonial house centrally located in most villages. The size of lineages is a matter of some dispute, but most probably numbered between 70 and 120 individuals. Serrano people were organized into clans affiliated with one of two exogamous moieties. Clans were led by a hereditary chief who occupied the village “big house” where ceremonies took place and shamans were initiated.

4.5 HISTORY

Historic-era California is generally divided into three periods: the Spanish or Mission period (1769 to 1821), the Mexican or Rancho period (1821 to 1848), and the American period (1848 to present).

Spanish Period (1769–1821)

The Spanish period is characterized by exploration and settlement of the area by Europeans. In 1772, Pedro Fages became the first known European explorer to enter the Antelope Valley when he traveled through the Cajon Pass and into the Mojave Desert to pursue deserting soldiers. Fages most likely followed the Mojave Trail, a Native American trail predating European exploration of the area, which followed the Mojave River from Soda Lake to the San Bernardino Mountains, and then down the Cajon Pass into the coastal region. The earliest known contact of native inhabitants in Serrano territory came in 1776 when Francisco Garces visited Native American villages along the upper Mojave River. Garces later traveled the Mojave Trail again when he visited Mission San Gabriel (Barton, Terry, and Scott 2019:16).

As the Spanish developed commerce between their outposts in Santa Fe and Los Angeles, they further developed a series of trails following the Mojave River, known collectively as the Old Spanish Trail. The

trail was utilized for trading goods from Santa Fe and Mexican horses from Los Angeles. After an attack on Mission San Gabriel in 1810 by local Mojave Native Americans, the Spanish used this new trail to raid the deserts, leading to a significant decrease in the native population in the region. (Barton, Terry, and Scott 2019:16)

Mexican Period (1821–1848)

The Mexican period is marked by the inland settlement on large land grants (ranchos) and by the opening of Alta California to American explorers. One such explorer from New York, Jedediah Strong Smith, crossed the Mojave River in 1826, calling it the "Inconstant River" because of its sporadic and partially underground flow. Later, in 1844, General Fremont recorded the Mojave River as the "Mohave River" while in search of the Old Spanish Trail. The route would later be utilized and improved by the Mormon Battalion as they were stationed there between 1847 and 1848 to guard the Cajon Pass during the Mexican-American War. The Mormons used the route to return to Salt Lake City following the war in 1848. (Barton, Terry, and Scott 2019:16-17)

American Period (1848–Present)

The American period is distinguished by the influx of American and European settlers into the area. In 1848, gold was discovered at Sutter's Mill near Coloma on the south fork of the American River, thereby kicking off the California Gold Rush and spurring a mass migration into the state from all over the country.

Lancaster (1876–Present)

In 1876, the Southern Pacific Railroad (SPRR) completed a new track passing through the western Antelope Valley, connecting Los Angeles and Bakersfield. Approximately 3,000 workers, half of them Chinese, labored on the track. Soon thereafter, the SPRR constructed a siding, roundhouse for locomotive repairs, and shacks for railroad workers. The siding and small railroad settlement was named Lancaster (Gurba 2005). This was the future city's first non-indigenous settlement.

In 1883, an artisanal well was drilled at Lancaster, meeting the settlement's most important need. That same year, developer Moses Langley Wicks built a lumberyard in Lancaster, the first commercial structure there. In 1884, Wicks purchased 60 sections (38,400 acres) from the SPRR, marked out lots and streets, and began development of a town (Gurba 2005).

With access to distant markets via a new transcontinental railroad, combined with a climate that provided enough rainfall for dry farming, many homesteaders established farms in the area during the 1880s, cultivating alfalfa, barley, wheat, and tree fruits. The profitability of farming decreased substantially, however, between 1894 and 1904 due to a severe drought that decimated the region's economy and forced many farmers to abandon their homesteads (Los Angeles County Library 2022).

In the early twentieth century, agriculture revived in the Antelope Valley with increased irrigation, made possible by electricity. By the 1930s, much of the Antelope Valley was under cultivation for alfalfa, and downtown Lancaster served as the local commercial hub (Gurba 2005).

The decade-long drought also hurt cattle ranches in the Lancaster area. Cattles ranches had been established in the Antelope Valley as early as the 1840s. With the discovery of gold in California and the

rising demand for beef, cattle ranching became increasingly important to the local economy. However, during the second decade of the twentieth century, land disputes between ranchers and farmers led to the fencing of land by farmers and alfalfa growers to protect their crops from damage by livestock. This restriction, combined with a population increase in the Antelope Valley, contributed to a substantial decline in the local cattle industry during the 1920s (Los Angeles County Library 2022).

For farmers, however, the first half of the twentieth century was a productive period overall. With advancements in irrigation methods and electrical water pumps, farmers could access underground water with relative ease. The new, modern pumps provided a more reliable source of water than the free-flowing artesian wells and contributed to a resurgence in local farming beginning in 1905. In addition to reestablishing crops and orchards that had previously thrived, farmers were able to utilize these modern irrigation methods to cultivate crops, particularly alfalfa, on a large, commercial scale. By 1920, alfalfa had emerged as the Antelope Valley's major crop, with up to 100,000 tons produced annually by the early 1930s. Other important agricultural products included pears, grapes, and poultry. After World War II, the economy of the Antelope Valley shifted largely from agriculture to the defense and aerospace industries. The area around the subject property, however, still retains its rural, agricultural character (Thompson 1929; Gardiner 2002).

While alfalfa requires 4.92 acre feet of water per year to grow, the same amount of onions require only 2.96 acre feet per year. Increased demand for onions as greater Los Angeles boomed in the post-World War II years led to a sizable increase in onion production in Lancaster and the surrounding Antelope Valley. At the height of onion production in the Antelope Valley, 29 onion farms worked 5,000 acres (Drake 2019; Pera 2021). The Calandri family is the last onion grower in the Antelope Valley. In 1946, Pacoima-born John Calandri moved to the Antelope Valley east of Lancaster and began growing cantaloupes. He continued growing melons, later experimenting with carrots, before specializing in onions (*Valley Times* 1954). Early on, the primary Calandri farm was located on B Street between 90th and 110th Streets (*Valley Times* 1960), but was expanded by both Calandri and his family. In the 1980s, John Calandri Jr. purchased additional acreage and began farming onions. The two farms were merged after the senior Calandri's death. Today, John Calandri Jr.'s son Brandon Calandri manages the sprawling Calandri family operations, and his large onion-growing operation encompasses the entirety of the Cannabis Facility site (Onion Business 2016).

Although aerial imagery and newspaper accounts indicate that land use on the Cannabis Facility site was agricultural and planted with row crops—perhaps alfalfa during the late 1940s and onions beginning in the 1950s—the 1974 USGS aerial image reveals that a portion of the property near 40th Street East and East Avenue K 8 had been developed with an equestrian training track and a long, L-shaped stable with 20 stalls (NETRonline 1948; Onion Business 2016). By 2005, Google Earth aerial imagery shows that the stables were physically deteriorating, suggesting that the property was no longer being used to board and train horses. Today the track is no longer extant, and the area is now used to store trailers, irrigation pipes, and farm equipment. While the property at 43200 40th Street East is no longer used for equestrian-related purposes, there are still a few horse boarding and training ranches in the area, including the 100-year-old Lazy T. Ranch located 20 miles south of Lancaster (Lazy T. Ranch 2022).

5 PALEONTOLOGICAL AND CULTURAL RESOURCES IDENTIFICATION METHODS

Michael Baker International conducted background research to identify previously recorded cultural resources and cultural resource studies within the project site. The research consisted of records searches for paleontological, archaeological, and historical resources; literature, map, and aerial photograph reviews; local historical group consultation; field surveys; and California Register evaluations. Results of the efforts are presented in this section.

5.1 PALEONTOLOGICAL RECORDS SEARCHES

Natural History Museum of Los Angeles County

Michael Baker International staff received a fossil locality records search from the NHMLAC on June 19, 2022 (**Appendix A**). The NHMLAC records search did not find any previously known localities within the project site. Twelve fossil localities from similar sedimentary deposits as those found within the project site occurred within 10 miles of the project site. Two additional localities from similar sedimentary deposits to those observed in the project site occurred within 37 miles of the project site (**Table 1**).

TABLE 1. PREVIOUSLY RECORDED PALEONTOLOGICAL RESOURCES FROM NHMLAC RECORDS SEARCH

Collection Number	Taxa	Formation	Intervals	Depth	Distance to Project Site
LACM VP 7884	Camels	Unknown formation (fluvial silt)	Pleistocene	4 ft	~4 miles NW
LACM VP 7853	Rabbits, camels, rodents (squirrels, rats, voles, mice), lizards, snakes, skinks, and fish (smelt)	Unknown formation (loess and sandstone underlying dune deposits)	Pleistocene	3–11 ft	~6 miles NW
LACM VP CIT451	Mastodons, horses	Harold Formation	middle to early Pleistocene	Unknown	~9 miles S
LACM VP 5942–5950	Snakes, lizards, rabbits, rodents (gophers, mice, rats), birds	Unknown formation	Holocene	0–9 ft	~10 miles SE
LACM VP 7891	Camels	Unknown formation	Pleistocene	21 ft	~25 miles NW
LACM VP 7786	Rodents (voles)	Alluvium (silty sandstone)	Pleistocene	10–11 ft	~37 miles E

Online Paleontological Records Searches

Michael Baker International conducted supplemental paleontological records searches within 10 miles of the project site using the following websites:

- University of California Museum of Paleontology Locality Search (UCMP 2022)
- San Diego Natural History Museum Collection Database (SDNHM 2022)
- The Paleobiology Database (PBDB 2022)

While the databases showed no previously identified fossil localities within the project site, one locality reported by the PBDB is within 9 miles (**Table 2**). Upon further examination of this locality, it was discovered that the reported geologic formation (Juncal Formation) does not appear on the local geologic maps (Dibblee and Minch 2008; Lancaster 2011) and the source document for this locality (Squires 1988) reports fossil localities for Lockwood Valley in Ventura County (over 50 miles west of the project site). It is possible that the GPS coordinates for this PBDB record were entered incorrectly.

TABLE 2. PREVIOUSLY RECORDED PALEONTOLOGICAL RESOURCES FROM ONLINE DATABASES

Collection	Taxa	Formation	Intervals	Distance to Project Site
PBDB	Bivalves (clams, cockles), gastropods (turban snails, tower snails, cone snails)	Juncal Formation	Eocene	~9 miles NW

Sensitivity Analysis

The NHMLAC records search, and UCMP, SDNHM, and PBDB fossil locality searches did not identify any paleontological resources within the project site. However, significant fossil localities have been found in similar geologic formations to those observed in the project site, specifically within the Cannabis Facility site.

The mapped rock formations within the Overlay Zone, excluding the Cannabis Facility site, consist of alluvium of Holocene to late Pleistocene age and eolian deposits of Holocene age. These sediments are typically too young to contain significant fossil deposits. Therefore, the Overlay Zone has a low potential to disturb paleontological resources within undisturbed bedrock.

However, the proposed development at the Cannabis Facility site has been mapped with a higher proportion of older alluvial deposits (upwards of late Pleistocene in age) than the rest of the Overlay Zone. This indicates that the Cannabis Facility has a higher potential to disturb paleontological resources within undisturbed bedrock. Significant vertebrate fossil localities have been recovered from geologic formations of similar age and depositional environments within 10 miles of the project site. The Cannabis Facility site has a high sensitivity for significant fossil deposits.

5.2 SCCIC RECORDS SEARCH

On May 18, 2022, staff of the SCCIC conducted a records search at the direction of Michael Baker International. The SCCIC, of the California Historical Resources Information System, California State University, Fullerton, an affiliate of the California Office of Historic Preservation (OHP), is the official state repository of cultural resource records and reports for Los Angeles County. The records search (#23675.9776) included the Overlay Zone and a quarter-mile buffer. As part of the records search, the following federal and state of California inventories were reviewed:

- California Inventory of Historic Resources (OHP 1976)
- California Points of Historical Interest (OHP 1992 and updates)
- California Historical Landmarks (OHP 1996)
- Archaeological Determinations of Eligibility (OHP 2012). The directory includes determinations for eligibility for archaeological resources in Los Angeles County.

- Built Environment Resources Directory (BERD) (OHP 2022). The directory includes the listings of the National Register, National Historic Landmarks, California Register, California Historical Landmarks, and California Points of Historical Interest within Los Angeles County.

Results

Previous Studies

A total of 28 previous studies have been conducted within the project site and quarter-mile buffer (**Table 3**). Of those 28, 13 overlap the project site and 2 overlap the Cannabis Facility site. One hundred percent of both the Overlay Zone and the Cannabis Facility site have been subject to previous studies. However, these studies did not all include pedestrian survey. Approximately 25 percent of the Overlay Zone has been subject to pedestrian survey. Less than 5 percent of the Cannabis Facility site has been previously surveyed.

TABLE 3. PREVIOUS STUDIES WITHIN PROJECT SITE AND SEARCH AREA

Report Number	Author	Title/Description	Date	Location In Relation to Project Site
LA-01811	Robinson, R. W.	A Cultural Resources Investigation of 1652 Acres Located in East Lancaster, North Los Angeles County, California	1989	Overlay Zone
LA-02055	Love, Bruce and William H. De Witt	Cultural Resources Evaluation for Lancaster EIR Group 9 Lancaster, Los Angeles County	1990	Overlay Zone
LA-02345	Robinson, R. W.	A Cultural Resources Investigation and Assessment for the Antelope Valley High School #8 EIR, Los Angeles County, California	1990	Outside
LA-02404	Norwood, Richard H.	Phase I Archaeological and Historical Study for Tentative Tract No. 21170; 40 Acres in Lancaster, California	1991	Outside
LA-02546	Norwood, Richard H.	Phase I Cultural Resource Investigation for Tentative Parcel Map No. 23211 Lancaster, Los Angeles County, California	1992	Overlay Zone
LA-06803	Duke, Curt	Cultural Resource Assessment Cingular Wireless Facility No. Vy 064-01 Los Angeles County, California	2001	Outside
LA-07510	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation of Assessor Parcels 3170-013-002 and -027, Approximately 40 Acres in the City of Lancaster, Los Angeles County, California	2005	Overlay Zone
LA-07522	McKenna, Jeanette A.	Results of a Phase I Cultural Resources Investigation of the Antelope Valley Land, LLC Property (APN 3150-029-010), Approximately 2.5 Acres in Lancaster, Los Angeles County, California	2006	Outside
LA-07991	Tang, Bai "Tom", Michael Hogan, and Josh Smallwood	Cultural Resources Technical Report City of Lancaster General Plan Update	2006	Overlay Zone; Cannabis Facility
LA-08041	Hudlow, Scott M.	A Phase I Cultural Resource Survey for Property at 40th Street East and Avenue J, City of Lancaster, California	2005	Overlay Zone

TABLE 3, CONTINUED

Report Number	Author	Title/Description	Date	Location In Relation to Project Site
LA-08369	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation of the Sayani Property, Approximately 40 Acres in the City of Lancaster, Los Angeles County, California	2004	Outside
LA-08427	Cooley, Theodore G.	Archaeological Survey Report for Southern California Edison Company 66kv Antelope Bus Split Project Los Angeles County, California	2007	Overlay Zone
LA-09393	Parr, Robert E.	Archaeological Assessment of 21 Deteriorated Power Poles on the Southern California Edison Godde, Lariat, Zappa, Stealth, Museum, Force, Petan, Yoda, and Hughes Lake 12kV Circuits Los Angeles County, California	2008	Outside
LA-09679	Loftus, Shannon L. and Robin D. Turner	Cultural Resource And Paleontological Assessment, North Los Angeles / Kern County, Regional Recycled Water Master Plan, Los Angeles / East Kern Counties, California	2008	Outside
LA-09995	Schmidt, James	Archaeological Letter Report: Roosevelt, Forage, Sun Village, and Assembly 12kV Distribution Circuits Deteriorated Pole Replacement Project, Los Angeles County, CA	2009	Outside
LA-10144	DeGiovine, Michael M. and Wilson, Stacy L.	Second Addendum: Archaeological Survey Report for Southern California Edison Company the 66KV Antelope Bus Split Project, Los Angeles County, CA	2008	Overlay Zone; Cannabis Facility
LA-10735	Mirro, Michael, John J. Eddy, and Josh Smallwood	Phase I Cultural Resources Investigation for the Sunlight Partners Solar Project: VINAM- 1 9011, 19.2 acres for APN 317-000-901-1, City of Lancaster, Los Angeles County, California	2010	Outside
LA-10781	Orfila, Rebecca	Archaeological Survey for the Southern California Edison Company: Replacement of Seven Deteriorated Power Poles on the Forage 12kV, Grubstake 12kV, Jordan 12kV, Lloyd 12kV, Oban 12kV, Seacliff 12 kV, and Titan 12kV Circuits near Carpinteria	2010	Overlay Zone
LA-10875	Parr, Robert E.	Cultural Resource Assessment for the Replacement of Ten Deteriorated Power poles on the Southern California Edison Company, Hughes Lake, Lucerne, Duntley, Fairmont, Oban, Kinsley, Bledsoe, and Museum 12 kV Distribution Circuits, Los Angeles County, CA	2011	Outside
LA-11013	Schmidt, James	Archaeological Letter Report: Museum 12 kV Bolthouse Farms line Extension, Lancaster Grid Reliability Maintenance Projects (GRM), IO #316666 TD 301328, Los Angeles County, California	2011	Overlay Zone
LA-11453	Orfila, Rebecca	Archaeological Survey for the Southern California Edison Company: Nineteen deteriorated power poles on the Petan 12kv, Forage 12kv, Hangar 12kv, Lupine 12kv Assembly 12kv, Force 12kv, Moonglow 12kv, and Highes Lake 12kv circuits in Los Angeles County, CA	2011	Overlay Zone

TABLE 3, CONTINUED

Report Number	Author	Title/Description	Date	Location In Relation to Project Site
LA-11496	Perez, Don	LB TMO Colo SCE Piute/LA5677A, 44490 90th Street East Lancaster, Los Angeles County, California	2011	Outside
LA-11608	Bonner, Wayne	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LA0204, USID 24313 (E Avenue J & 90th Ste), 9021 East Avenue J, Lancaster, Los Angeles County, California	2011	Outside
LA-12084	Tang, Tom	Historical/Archaeological Resources Survey Vandiver 4006 Project (Sunlight Partners), Section 20, Near the City of Lancaster, Los Angeles County, California	2012	Overlay Zone
LA-12092	Tang, Tom	Historical/Archaeological Resources Survey Owen 2023 Project (Sunlight Partners), Section 25, Near the City of Lancaster, Los Angeles County, California	2012	Outside
LA-12339	Schmidt, James	Archaeological Survey Report for Southern California Edison Company's Grid Reliability and Maintenance Program Line Extension Project, Forage 12kV Distribution Circuit, from existing Pole to well Head, Lancaster area, Los Angeles County, CA	2013	Outside
LA-12350	Mirro, Michael	Cultural Resources Investigation for the Connector Line and Trenches for Arrache Solar Projects near Palmdale, California	2013	Outside
LA-12569	Drover, Christopher and Maxon, Patrick	Phase I Cultural Resources Assessment Desert Sun Ranch (CUP 11-06) Project	2011	Overlay Zone

Documented Resources

A total of 20 resources are located within the project site and a quarter-mile buffer (**Table 4**). Of these 20, six are located within the Overlay Zone. There are no resources documented within the Cannabis Facility site. The resources are described below.

TABLE 4. RESOURCES PREVIOUSLY RECORDED IN THE PROJECT SITE AND SEARCH AREA

Primary Number	Permanent Trinomial	Description	Age	CRHR/NRHP Evaluation	Location Within Project Site
P-19-001968	CA-LAN-001968H	Architectural debris, refuse, fences, irrigation system, well, and cement walkway associated with demolished historic homesite/farm	Middle 20th Century	Unevaluated	Outside
P-19-003680	CA-LAN-003680H	Two cement foundations, irrigation pipes, and two standpipes	Middle 20th Century	Unevaluated	Outside
P-19-003696	CA-LAN-3696	Can and bottle scatter	Middle 20th Century	Unevaluated	Overlay Zone

TABLE 4, CONTINUED

Primary Number	Permanent Trinomial	Description	Age	CRHR/NRHP Evaluation	Location Within Project Site
P-19-003817	CA-LAN-003817H	Can and bottle dumps and borrow pit	Middle 20th Century	Unevaluated	Overlay Zone
P-19-004157	CA-LAN-004157H	Foundation slabs, irrigation standpipes, pumphouse, domestic trees, fence lines, fallow agricultural fields, and refuse deposits associated with abandoned farmstead	20th Century	Unevaluated	Overlay Zone
P-19-004764	CA-LAN-004764H	Can and bottle scatter	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004765	CA-LAN-004765H	Domestic refuse deposit	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004766	CA-LAN-004766H	Domestic refuse deposit	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004767	CA-LAN-004767H	Domestic refuse deposit	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004769	CA-LAN-004769H	Can and bottle scatter	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004770	CA-LAN-004770H	Domestic refuse deposit	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004771	CA-LAN-004771H	Can dump	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004772	CA-LAN-004772H	Domestic refuse deposit	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004773	CA-LAN-004773H	Domestic refuse deposit	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-004776	CA-LAN-004776H	Well casing, foundations and footings, trees, irrigation standpipes, and architectural refuse associated with abandoned farmstead	Middle 20th Century	Recommended ineligible for CRHR and NRHP	Outside
P-19-101398	None	Isolated wellhead	Historic	Unevaluated	Outside
P-19-101399	None	Isolated chalcedony flake	Prehistoric	Unevaluated	Outside
P-19-120054	None	Well, irrigation system, and refuse deposits	20th Century	Unevaluated	Overlay Zone

TABLE 4, CONTINUED

Primary Number	Permanent Trinomial	Description	Age	CRHR/NRHP Evaluation	Location Within Project Site
P-19-120056	None	One obsidian flake and associated clam shell fragments	Prehistoric	Unevaluated	Overlay Zone
P-19-120057	None	"Historic complex" including refuse deposit	Middle 20th Century	Unevaluated	Overlay Zone

P-19-003696/CA-LAN-3696

This resource consists of a historic refuse deposit consisting of bottles and cans scattered across an area measuring approximately 8 feet by 14 feet. Diagnostic artifacts were observed ranging from the 1940s to the 1970s but not described in detail. Only a cursory examination was made of the material at the time of recordation. This resource has not been evaluated for inclusion in the California Register. This resource is located within the Overlay Zone, but outside the Cannabis Facility site.

P-19-003817/CA-LAN-003817H

This resource consists of a multi-episode refuse dump and an associated borrow pit. A minimum of four refuse deposits make up the dump site. Each refuse deposit includes cans and glass fragments. A smaller amount of ceramic fragments and other artifacts such as oil filters, chicken wire, and faunal bones were also noted in one or more of the deposits. All of the refuse appears to date to the middle of the twentieth century. The borrow pit measures 130 feet north-south and 29 feet east-west and is approximately 5 feet deep with irregular sloping sides. Additional metal and glass refuse are scattered within the borrow pit. This resource has not been evaluated for inclusion in the California Register. This resource is located within the Overlay Zone, but outside the Cannabis Facility site.

P-19-004157/CA-LAN-004157H

This resource consists of an abandoned twentieth century farmstead. Surviving elements of the built environment include foundation slabs, irrigation standpipes, a wellhouse in poor condition, fence lines, non-native trees, and fallow agricultural fields. One refuse deposit consisting of plastic, building materials, and modern cans along with one paneled glass medicine bottle fragment is also located at the site. A 2-foot-thick earthen mound was also noted and believed to be capping another refuse deposit. This resource has not been evaluated for inclusion in the California Register. This resource is located within the Overlay Zone, but outside the Cannabis Facility site.

P-19-120054

This resource consists of a well and irrigation system, at least four discrete refuse scatters, and additional refuse scattered throughout an assessor parcel, all of which date to the twentieth century. The well and irrigation system consist of a wellhead and concrete piping which, though abandoned, had been continuously maintained until a relatively recent date and included both historic-in-age and recent elements. The refuse scatters consist primarily of glass fragments with some ceramic and metal fragments mixed in; the four scatters range from approximately 10 meters to 100 meters in diameter. The majority

of the artifacts appear to date to the middle of the twentieth century, with a few older artifacts on the property dating from approximately the pre-1920s, i.e., the late nineteenth or earliest twentieth centuries. This resource has not been evaluated for inclusion in the California Register. This resource is located within the Overlay Zone, but outside the Cannabis Facility site.

P-19-120056

This resource consists of one very small obsidian flake and fragments of clam shell. This resource has not been evaluated for inclusion in the California Register. This resource is located within the Overlay Zone, but outside the Cannabis Facility site.

P-19-120057

This resource consists of "a historic complex." The majority of the complex extended outside the recorder's project area and therefore was not documented. One small refuse scatter including glass and ceramics was noted, possibly including artifacts dating to the 1920s. This resource has not been evaluated for inclusion in the California Register. This resource is located within the Overlay Zone, but outside the Cannabis Facility site.

5.3 LITERATURE REVIEW

Michael Baker International reviewed publications, maps, and websites for archaeological, ethnographic, historical, and environmental information about the project area and its vicinity. Literature reviewed here includes:

- *Township 7 North Range 10 West, San Bernardino Meridian Plat map* (GLO 1856a)
- *Township 7 North Range 11 West, San Bernardino Meridian Plat map* (GLO 1856b)
- *73. Part of Southern California* (Wheeler 1883)
- *Perris' Miners' Map of Southern California* (Perris 1896)
- *Elizabeth Lake, Calif,*. 1:96,000 scale topographic quadrangle (USGS 1915a)
- *Elizabeth Lake, Calif.*, 1:250,000 scale topographic quadrangle (USGS 1915b)
- *Elizabeth Lake, Calif.*, 1:250,000 scale topographic quadrangle (USGS 1917)
- *Tierra Bonita, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1930a)
- *West Alpine Butte, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1930b)
- *Tierra Bonita, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1933a)
- *West Alpine Butte, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1933b)
- *Alpine Butte, Calif.*, 1:62,500 scale topographic quadrangle (USGS 1945)
- *Alpine Butte, Calif.*, 1:50,000 scale topographic quadrangle (USGS 1947)
- *Alpine Butte, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1957)
- *Lancaster, Calif.*, 1:62,500 scale topographic quadrangle (USGS 1958a)
- *Lancaster East, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1958b)
- *Alpine Butte, Calif.*, 1:24,000 scale topographic quadrangle (USGS 1992)
- *Lancaster East, Calif.*, 1:24,000 scale topographic quadrangle (USGS 2012)
- *A Guide to Historic Places in Los Angeles County* (Grenier, Nunis, and Poole 1978)
- *Historic Spots in California* (Hoover et al. 2002)
- Aboriginal Society in Southern California (Strong 1929)

- A Brief Sketch of Serrano Culture (Benedict 1924)
- Serrano (Bean and Smith 1978)
- Handbook of the Indians of California (Kroeber 1925)
- "The Desert Serrano of the Mojave River" (Sutton and Earle 2017)

Results

The project site is located within the traditional ancestral territory of the Serrano. This ethnic group was given the name Serrano, meaning mountaineers, by the Spanish who encountered them in the San Bernardino Mountains east of Cajon Pass, but their territory continued east onto the desert floor of the Mojave. The Serrano were organized into small villages and hamlets. Most of these settlements were located in the Upper Sonoran Life Zone, ranging in elevation from approximately 3,500 feet amsl to 7,000 feet amsl, from which seasonal parties would depart to exploit the diverse ecologic areas in the desert, mountains, and passes that made up their territory. Some permanent villages were located around permanent water sources on the desert floor (Bean and Smith 1978; Benedict 1924; Strong 1929). Unfortunately, the ethnogeography of the western Antelope Valley is little documented. The project site does not appear in comprehensive maps of Native American sites in Southern California such as Kroeber's (1925) or even in maps focused on the Serrano and Desert Serrano (Benedict 1924:367; Strong 1929:7; Sutton and Earle 2017:22). The consulted sources identified no hamlets, villages, or named locations within the Overlay Zone.

Middle nineteenth century General Land Office maps depict a completely unsettled area, devoid not only of buildings but also of roads and trails. No human-made features are visible in these maps (GLO 1856a, 1856b).

By the late nineteenth century, Lancaster had been founded along the SPRR line west of the Overlay Zone. The Overlay Zone itself remained undeveloped (Perris 1896; Wheeler 1883).

Development of what is now eastern Lancaster began in earnest in the early twentieth century. Only the western part of the Overlay Zone, including the Cannabis Facility site, is exhibited in the 1915 and 1917 USGS topographic maps. These maps show the Overlay Zone as a very sparsely settled area with Little Rock Creek passing through. One of the few buildings in the Overlay Zone stands on the Cannabis Facility site, in the approximate location of the existing building complex (USGS 1915a, 1915b, 1917).

The Overlay Zone remained sparsely developed into the early 1930s. More wells were developed, especially in the eastern part of the Overlay Zone, suggesting increased agriculture (USGS 1930a, 1933a). By 1930, the Cannabis Facility site included two buildings (USGS 1930b, 1933b).

The Cannabis Facility site was more densely developed over the twentieth century. By 1958, at least six standing structures existed in two discrete locations on the site—a cluster of five buildings and structures northeast of the intersection of East Avenue K 8 and 40th Street East and a building complex at the east end of East Avenue K 8. In addition, three wells or stock tanks were scattered across the parcel (USGS 1958b).

Over the rest of the twentieth century, the Overlay Zone continued to slowly develop. The area remains very sparsely developed, with a radio station tower, roads, buildings, wells, and stock or irrigation tanks

added across its broad extent. Urban Lancaster remains far to the west of the project site. No named communities are mapped on USGS maps within the Overlay Zone at any time in its history.

5.4 PARCELS WITH BUILDINGS OVER 45 YEARS OF AGE

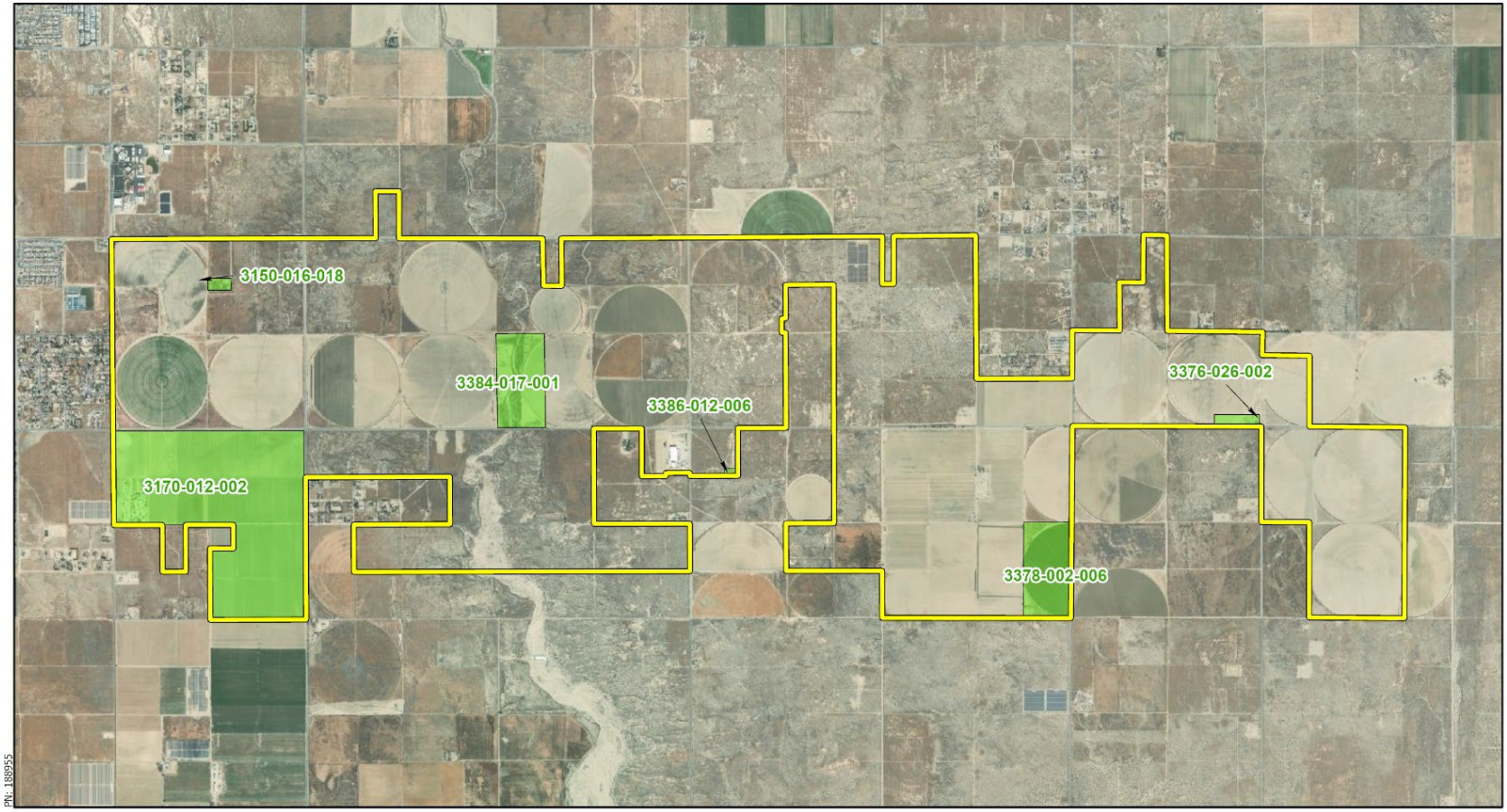
Parcel data provided by the Los Angeles County Assessor's Office identified six parcels (excluding state land) within the Overlay Zone that are of historic age (>45 years old) (**Table 5**). Parcel built date data is incomplete and this list likely does not include all historic-aged buildings in the Overlay Zone; however, the archival map review of the area (discussed above) identified very limited development of the area starting in the late nineteenth century, suggesting that the number of historic-aged buildings in the study area is low. The entire Overlay Zone has the potential for historic-aged buildings that may require evaluation to the California Register if affected by a future project.

TABLE 5. HISTORIC-AGED BUILDINGS DOCUMENTED BY THE LOS ANGELES COUNTY ASSESSOR

APN	Address	Construction Date	Eligibility
3386-012-006	7166 East Avenue K	1930	Unevaluated
3384-017-001	6001 East Avenue K	1932	Unevaluated
3378-002-006	8717 East Avenue L	1933	Unevaluated
3376-026-002	9847 East Avenue K	1846*	Unevaluated
3170-012-002	43200 40th Street E	1964	Not eligible**
3150-016-018	4566 East Avenue J	1947	Unevaluated

*Date is incorrect and the accurate built date is currently unknown.

**Evaluated as a part of this study.



Parcels Over 45 Years of Age
Overlay Zone

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

N

0 0.25 0.5 1 Miles

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Lancaster, California*

Parcels Over 45 Years of Age

Figure 4

Assessor documents give demonstrably incorrect information regarding APN 3376-026-002. According to assessor data, this parcel includes two buildings, a 703-square-foot residence constructed in 1832 and a 768-square-foot residence constructed in 1846. These dates are incorrect. There were no Spanish or Mexican land grants in the Antelope Valley. In 1848, under the terms of the Treaty of Guadalupe-Hidalgo, the land on which Lancaster was later established became property of the United States. It was then entered into the United States Public Lands Survey System. As discussed in the archival map review (discussed above), the earliest maps of the project site, created by the United States General Land Office in 1856, show no buildings or structures in the project site (GLO 1856a, 1856b). Even after Lancaster was established as a settlement, nineteenth century maps show the project site as undeveloped (Perris 1896; Wheeler 1883). A building appears in this location on the 1930 West Alpine Butte, California 1:24,000 USGS topographic map (USGS 1930b). A desktop analysis of Google Earth imagery indicates that the building materials and styles of the standing buildings on APN 3376-026-002 are consistent with a construction date in the first half of the twentieth century.

5.5 INTERESTED PARTIES CONSULTATION

Native American Coordination

On April 20, 2022, Michael Baker International sent a letter describing the project to the NAHC in Sacramento asking the commission to review its Sacred Lands File for any Native American cultural resources that might be impacted by the project. The NAHC responded with a letter sent via email dated May 25, 2022. The letter stated, "The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative" (**Appendix B**).

Separately, the City of Lancaster is conducting Assembly Bill 52 consultation with those tribes who have informed the City in writing of their interest in consulting on projects in the City's jurisdiction. No Native American contact was completed by Michael Baker International. The results of the City's Assembly Bill 52 consultation will be documented separately by the City.

Historical Society Consultation

On June 9, 2022, Michael Baker International sent a letter describing the project, with maps depicting the Overlay Zone and the Cannabis Facility site, to the West Antelope Valley Historical Society based in Lancaster. The letter requested any information about, or concerns regarding, historical resources that may be impacted by the proposed project (**Appendix C**). No response to the consultation letter has been received to date.

5.6 ARCHAEOLOGICAL/BUILT ENVIRONMENT PEDESTRIAN SURVEY

Survey Methods

Michael Baker International archaeologists Kholood Abdo, MA, RPA, Epifanio Figueroa, BA, and Marc Beherec, PhD, RPA, conducted an archaeological and built environment field survey of the Cannabis Facility site at 43200 40th Street East (APN 3170-012-002) between June 13 and June 17, 2022. The survey started at the southeast corner of the Cannabis Facility site (the intersection of 50 Street East and East Avenue L) and moved west. It was completed at 40th Street East and East Avenue K 8. All portions of the

Cannabis Facility site were accessible and surveyed systematically by walking south-north transects spaced at 35 to 45 meter intervals, inspecting any unusual landforms, contours, soil changes, and any potential features or cultural site markers. On June 17, 2022, Michael Baker International conducted a built environment survey of the property located in the southwest portion to assess the existing buildings and note the current condition, construction, materials, and any alterations to the buildings. Documentation included photographs and field notes, and photographs were incorporated into the California Department of Parks and Recreation (DPR) 523 series (confidential **Appendix E**).

The rest of the project site, consisting of the Overlay Zone outside of the Cannabis Facility site, was not surveyed.

Survey Conditions

The Cannabis Facility site consists of a developed property and agricultural land. The developed property is located at the west portion of the project site along 40th Street E, and includes two single-family residences, a detached garage, a barn, two storage buildings, a horse stable and corrals, and the footprint of a former horse training track. The exposed ground surface within the developed property was either compacted or graveled with no visible exposed native soils. The property is currently largely used for agricultural equipment storage. The horse stables structure appears to have burned at an unknown date and is in poor condition.

The majority of the Cannabis Facility site is composed of undeveloped agricultural land (**Photo 1** through **Photo 4**). At the time of the survey, all the agricultural fields were plowed with no crops growing. Sediments observed throughout the agricultural fields consisted of fine sandy loam and silty clay loam. Vegetation consisted of patches of non-native seasonal grasses and weeds. Ground visibility within the agricultural fields was good, ranging from 90 to 100 percent. Disturbances noted include historical and modern agricultural land use, plowing, modern irrigation pipes, and modern refuse dumping, Styrofoam and cardboard packaging fragments, plastic motor oil containers, and remnants of plastic irrigation pipes. Also noted across the agricultural fields are fragments of broken concrete pipe possibly from a former irrigation system. A few modern irrigation features are extant in the Cannabis Facility site, including large steel pipes and electric water pumps; these features were not documented as they were not 50 years of age.

Photo 1: **Overview of the southeast corner of the Cannabis Facility site on 50th Street East and East Avenue L (facing northwest).**

Photo 2: **Overview of the southwest corner of the Cannabis Facility site on East Avenue L (facing northeast).**

Photo 3: Overview of the west corner of the Cannabis Facility site (facing west).

Photo 4: Overview of the Cannabis Facility site at the northwest corner of East Avenue K and 40th Street East (facing south).

Survey Results

As a result of the field survey, two historic-in-age cultural resources were identified within the site of the Cannabis Facility. One archaeological site, a historic-period refuse scatter, was documented. In addition, one built resource, consisting of two buildings and four historic-period water conveyance features, was also documented. No additional historic or prehistoric archaeological resources were encountered during the survey. The resources are described below and DPR 523 series for each of these resources are included in confidential **Appendix E**.

MBI-001H

This site consists of a discrete historic-period domestic household refuse deposit dating to around post-1945. It measures approximately 120 feet by 75 feet (north-south by east-west) and is located north of East Avenue L and south of East Avenue K 8 (**Photo 5**).

Photo 5: Pin flags marking artifacts in historic refuse scatter, overview, June 14, 2022 (view north).

The site contains approximately 45 glass fragments from various household refuse items. They include flat window glass; brown, clear, and aqua jar and bottle glass; an aqua soda bottle crown finish; and an aqua bottle base bearing the Owens-Illinois Glass Company's trademark logo (a Diamond, Oval, and I entwined, and the text "*Duraglas* 1947)"; a milk glass jar fragment; and a clear glass medicinal bottle finish. The refuse also contained six tableware ceramic fragments, a battery core, a round nail, and faunal bone food refuse.

The deposit is in poor condition. Intensive agricultural activity at the site appears to have broken and displaced artifacts.

43200 40th Street East

This 458-acre agricultural parcel, on the east side of 40th Street East and the north side of East Avenue K 8, contains seven buildings. These buildings are numbered 1 through 7 for the purposes of this study.

Building 1 is a single-story, 1,237-square-foot, Ranch-style residence with an irregular ground plan, a concrete slab foundation, and a wood-frame structural system (**Photo 6**). The building is capped with a moderately pitched, intersecting gable roof clad with asphalt shingles and eaves that are enclosed with narrow fascia board. The front entry displays a paneled wood replacement door, and the rear wood entry door has been modified with an upper light. The exterior walls are clad with painted stucco. The residence is in overall good condition.

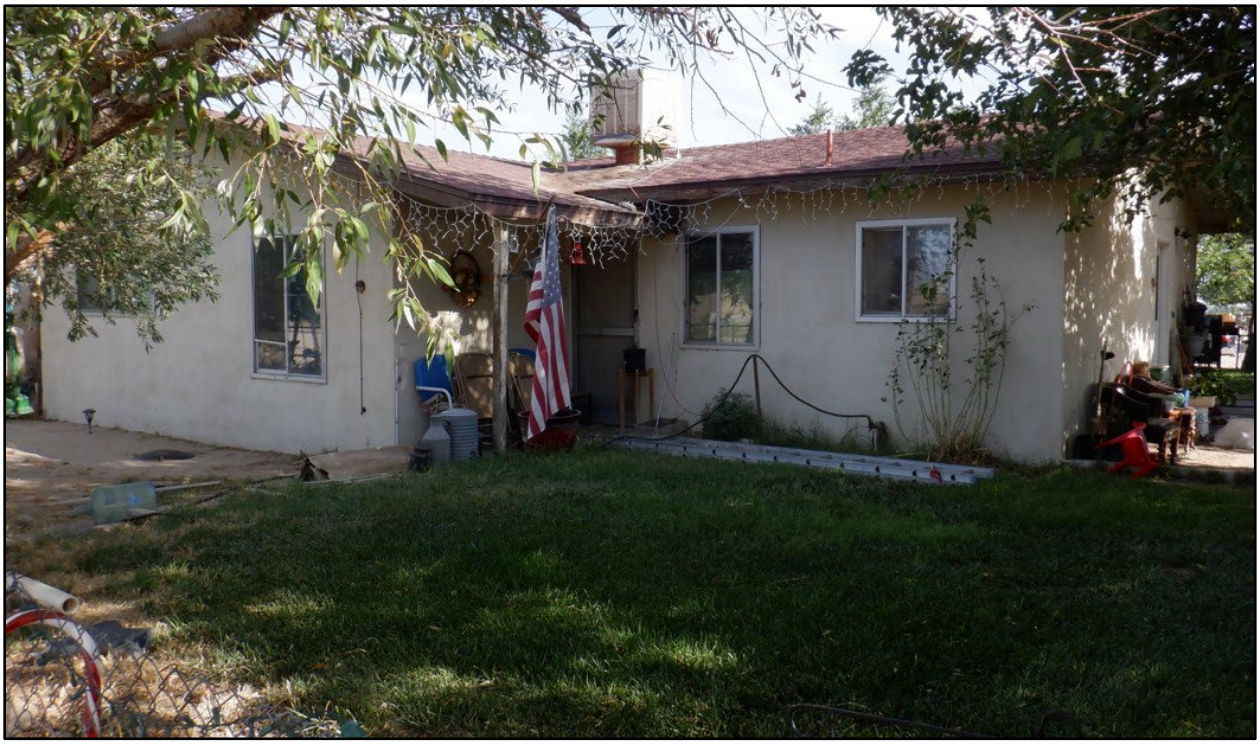


Photo 6: Building 1 (residence), June 17, 2022 (view north).

Building 2 is a single-story, vernacular residence with Ranch-style elements, a rectangular plan, moderately pitched gable roof clad with asphalt shingles, exposed rafter tails, wood-frame structural system, and exterior walls clad with beveled tongue-and-groove siding and board-and-batten siding (**Photo 7**). The foundation type is unknown. The front entry features a paneled wooden replacement door protected by a metal security gate. The metal-frame, horizontally sliding windows are all non-original. A shed roof addition has been appended to the north gable end wall. The residence is in overall good condition.

Photo 7: Building 2 (residence), June 17, 2022 (view west).

Building 3 is a detached, three-car garage with a rectangular plan, concrete slab foundation, moderately pitched gable roof with asphalt shingles, and two non-original metal turbine roof ventilators along the north gable slope (**Photo 8**). The roof has a moderate overhang with exposed rafter tails along the eave edge. Two paneled, wooden, roll-up doors along the north elevation and an entry door on the east elevation provide access to the garage, and a non-original, metal-sash horizontally sliding window punctuates the east and west gable end walls. The garage is in overall good condition.

Photo 8: Building 3 (detached garage), June 17, 2022 (view south).

Building 4 is a two-story, monitor-style barn with a rectangular plan, concrete slab foundation, wood-frame structural system, and front-gabled corrugated-metal roof with a raised center gable on the second story (**Photo 9**). The primary and secondary roofs display shallow eaves with exposed rafter tails and wood fascia boards along the rake edge. Board-and-batten wood panels sheath the exterior walls and were used to construct the hinged utility doors—four punctuating the east elevation and five along the west elevation. Suspended from an overhead metal track along the north and south elevations are two horizontally sliding board-and-batten service doors. Alterations include the installation of a concrete service pad and a modern outdoor cobra-head light standard in the south gable peak. Additionally, it appears that the four equestrian Dutch doors were created in the mid-1970s, when the property was repurposed as a horse training facility. The barn is in overall fair condition.

Photo 9: Building 4 (barn), June 17, 2022 (view north).

Building 5 is a one-story, utilitarian storage building with a rectangular plan, concrete slab foundation, brick structural system, and shed roof clad with corrugated metal (**Photo 10**). The roof also has a narrow overhang with exposed rafter tails along the eave edge. The building's brick walls along the east, north, and south elevations have been elevated with horizontal wood planks. Window openings along the north and west elevations have been boarded over with plywood. A non-original, metal, roll-up utility door along the main (east) façade provides service access to the shed. Appended to the north elevation of the storage building is a small pent-roof addition with a corrugated metal roof, walls clad with plank boards, and a plank board entry door on the east elevation. The storage building is in overall fair condition.

Photo 10: Building 5 (storage building), June 17, 2022 (view southeast).

Building 6 is a one-story, utilitarian storage building with a rectangular plan, concrete slab foundation, wood-frame structural system, and side-gabled, crimped metal roof surmounted by three turbine ventilators along the roof ridge (**Photo 11**). Fenestration includes asymmetrically arranged original, horizontally sliding metal-sash windows along the east and north elevations that are secured with non-original metal grating. The east elevation displays a non-original wood entry door and a centered bay with suspended, horizontally sliding metal doors. An elevated metal storage structure supported by metal legs stands adjacent to the north elevation. The storage building is in overall fair condition.

Photo 11: Building 6 (storage building), June 17, 2022 (view northwest).

Building 7 is a one-story building that was previously used as a horse stable (**Photo 12**). The building has a L-shaped plan measuring approximately 425 feet by 100 feet and a concrete perimeter foundation. The structural system and exterior walls consist of mortared concrete masonry units and the building's shed roof is covered with corrugated metal sheets. Fascia boards enclose the narrow roof overhang, except for sections along the south and west elevations where the boards are missing. Punctuating the west elevation of the stable are 20 equestrian Dutch doors that lead into individual stalls. Extending from the east end of the stable are individual outdoor horse runs (exercising areas), each measuring approximately 85 feet in length and 20 feet in width and enclosed with a steel-wire, fixed-knot mesh and wooden posts. Alterations include boarded-over openings, door removals, removal of large portions of the corrugated metal roof, and gate removals. The stable and horse runs are in an overall ruinous condition.

Photo 12: Building 7 (stables), June 17, 2022 (view southeast).

Associated with the horse stable (Building 7) is a horse training track. Located west of the stable and adjacent to 40th Street East is the footprint of an oval-shaped training track measuring approximately 1,200 feet by 400 feet. The track appears on aerial images during the mid-1970s but appears not to be in use by the early 2000s. Presently, all the perimeter fencing has been removed and the wooden fence posts are stacked in piles near the track.

In addition to the buildings, various active and inactive irrigation features were observed throughout the property.

5.7 ARCHAEOLOGICAL SENSITIVITY ANALYSIS

Overlay Zone

The archaeological sensitivity for potential unknown prehistoric archaeological sites within the Overlay Zone is moderate. The Overlay Zone is located within the ancestral territory of the Serrano Native American tribe. No village sites are known or anticipated to have existed within the Overlay Zone. However, human use of the area extends into the deep past, including periods when the climate was much more suitable for human habitation. Moreover, the presence of ephemeral creeks in the Overlay Zone, especially Little Rock Creek, may have drawn Native Americans to the Overlay Zone seasonally. No prehistoric archaeological sites are documented within the Overlay Zone; however, an isolated flake documented within 0.25 miles of the Overlay Zone further suggests sporadic or seasonal use of the Overlay Zone and its vicinity.

The sensitivity for potential undocumented historic period buildings, structures, and archaeological sites is high. Topographic maps and aerial photographs indicate that the Overlay Zone shares the agricultural history of the western Antelope Valley beginning in the late nineteenth century. Six historic archaeological sites have been recorded within the Overlay Zone, as detailed in the records search section above. Similar historic homesteads and associated archaeological sites and historic built features are anticipated on the surface and at shallow depths within the Overlay Zone.

Cannabis Facility

Sensitivity for buried prehistoric archaeological resources within the Cannabis Facility site is considered low. The area is located far from any known Native American villages or any reliable sources of water, and is nearly 1 mile from Little Rock Creek. It is also located in the Lower Sonoran Life Zone, an arid region in which permanent villages were typically not established except near springs and other permanent water sources. No unusual or important natural resources (e.g., lithic raw materials) are known to have existed in this location. While it is anticipated the Cannabis Facility location was used by Native American groups, no archaeological evidence was observed during the field survey. There is a potential for previously unknown prehistoric archaeological resources beneath the plow zone, but the ground disturbance necessary for cannabis cultivation is anticipated to approximate that which currently occurs for onion cultivation. New deep excavations which might encounter deeply buried archaeological sites are not anticipated for the proposed project.

The sensitivity for buried historic-period archaeological resources is low. The western Antelope Valley was largely unutilized during the historic period until the late nineteenth and early twentieth centuries. The development of the Cannabis Facility location is documented in historical maps and aerial photographs. The known locations of existing and demolished structures were visited and investigated during the field survey, and limited archaeological remains are documented. To use this location as an operational farm throughout the twentieth and into the twenty-first century, considerable effort was expended to remove all traces of past buildings and structures, including foundations and architectural debris. No additional historic-period resources are anticipated based on the known development history.

Moreover, the Cannabis Facility site has been subjected to considerable recent disturbance. Buildings have been constructed, and in at least one case demolished, on part of the site. Irrigation tanks and

channels have also been excavated and filled in. The entire Cannabis Facility site shows evidence of tilling. This tilling would have damaged shallowly buried archaeological sites, but also would be expected to have brought buried artifacts to the surface.

Based on the archaeological sensitivity assessment, the Cannabis Facility site has low potential for buried archaeological resources.

6 CALIFORNIA REGISTER OF HISTORICAL RESOURCES EVALUATIONS

Two resources within the Cannabis Facility site required evaluation to the California Register: the historic-period refused scatter (MBI-001H) and the agricultural property at 43200 40th Street East. Below is a summary of each evaluation. Further documentation for each resource is located in the DPR 523 forms (confidential **Appendix E**).

6.1 MBI-001H

The historic-period refuse scatter does not appear to be eligible for listing in the California Register under any criteria.

Criterion 1: Archival research indicates that this resource is located on a parcel that was first developed in the twentieth century as a farm, with an associated farmhouse. However, this site was just one of many farms in the Lancaster area developed during the same period. Research has not revealed any significant events in national, state, regional, or local history associated with the site. The site does not appear to be eligible for inclusion in the California Register under Criterion 1.

Criterion 2: Archival research identified the names of several individuals associated with this APN. However, none of these persons are particularly notable or important to national, state, or local history. Moreover, refuse scatter that makes up the only visible remnant of the resource cannot be associated with any specific individual or group. Therefore, the site is recommended ineligible under Criterion 2.

Criterion 3: The refuse scatter does not embody the distinctive characteristics of a type, period, region, or method of construction, nor represent the work of a master or possess high artistic values. Thus, the resource is recommended ineligible under Criterion 3.

Criterion 4: The data potential of the refuse scatter is exhausted by this documentation. Available information does not indicate any further potential to yield information important to the prehistory or history of the community, state, or nation; therefore, the resource is recommended ineligible under Criterion 4.

In conclusion, MBI-001H is not eligible for listing in the California Register and is not a historical resource as defined by PRC Section15064.5(a) or a unique archaeological resource as defined by PRC Section 21083.2(g).

6.2 43200 40TH STREET EAST

The property at 43200 40th Street East lacks the necessary significance to meet any of the listing criteria for the California Register.

The subject property is one of many agricultural properties established in the Lancaster area of Antelope Valley. The development of agriculture in this area is tied to the extension of the SPRR trunk line from San Francisco to Los Angeles through the Antelope Valley in 1876. With access to distant markets via a new transcontinental railroad, combined with a climate that provided ample rainfall, many homesteaders established farms in the area during the 1880s, cultivating alfalfa, barley, wheat, and tree fruits. The profitability of farming decreased substantially, however, between 1894 and 1904 due to a severe drought

that decimated the region's economy and forced many farmers to abandon their homesteads (Los Angeles County Library 2022).

For farmers the first half of the twentieth century was a productive period overall. With advancements in irrigation methods and electrical water pumps, farmers could access underground water with relative ease. The new, modern pumps provided a more reliable source of water than the free-flowing artesian wells and contributed to a resurgence in local farming beginning in 1905. In addition to reestablishing crops and orchards that had previously thrived, farmers were able to utilize these modern irrigation methods to cultivate crops, particularly alfalfa, on a large, commercial scale. By 1920, alfalfa had emerged as the Antelope Valley's major crop, with up to 100,000 tons produced annually by the early 1930s. Other important agricultural products included pears, grapes, and poultry. After World War II, the economy of the Antelope Valley shifted largely from agriculture to the defense and aerospace industries. The area around the subject property, however, still retains its rural, agricultural character (Thompson 1929; Gardiner 2002).

Although aerial imagery and newspaper accounts indicate that land use on the subject property was agricultural and planted with row crops—perhaps alfalfa during the late 1940s and onions beginning the 1950s—the 1974 USGS aerial image reveals that a portion of the property near 40th Street East and East Avenue K 8 had been developed with an equestrian training track and a long, L-shaped stable (NETRonline 1948; Onion Business 2016). By 2005, Google Earth aerial imagery shows that the stables were physically deteriorating, suggesting that the property was no longer being used to board and train horses. Today the track is no longer extant, and the area is now used to store trailers, irrigation pipes, and farm equipment. While the property at 43200 40th Street East is no longer used for equestrian-related purposes, there are still a few horse boarding and training ranches in the area, including the 100-year-old Lazy T. Ranch located 20 miles south of Lancaster (Lazy T. Ranch 2022).

Criterion 1: The property at 43200 40th Street East lacks a direct and important association with any events significant in local or regional history, or the cultural heritage of the state or nation. Research suggests that the property was used as a farm or ranch by the early 1920s, based on county assessor records, which indicate that a dwelling had existed on the parcel at that time. Since then, the property has continued to be used for agricultural purposes—possibly for the cultivation of alfalfa prior to World War II and, after the war, for crops such as garlic, carrots, and potatoes—although part of the property appears to also have been used for an equestrian training track and boarding stables from the early 1970s to the early 2000s. The available historical records, however, do not indicate that the subject property made an important contribution to the agricultural development of Lancaster, Antelope Valley, or the state of California. As such, the property at 43200 40th Street East lacks sufficient associative significance to meet California Register Criterion 1.

Criterion 2: The property at 43200 40th Street East lacks a demonstrable association with the productive life of any person important in local, state, or national history. Neither the management or the staff at Caruso Investments LLC (the owner of the property since 2012) or any individual previously associated with the property—including Lancaster area onion farmer John Calandri, his son John A. Calandri, or grandson Brandon Calandri, or a woman identified in a ca. 1956 county building permit only as Mrs. Hartridge, or the farmer Alex R. Leshin, who was identified as the property owner in October 1954 on a county electrical permit application—have made a significant contribution to the agricultural

development of Lancaster, Antelope Valley, or the state of California. Consequently, the property at 43200 40th Street East lacks sufficient associative significance to meet California Register Criterion 2.

Criterion 3: The property at 43200 40th Street East does not contain any resources that embody the distinctive characteristics of a type, period, region, or method of construction, or that represent the work of a master or possess high artistic values. Building 1 is a modest Ranch-style residence built in 1964 that lacks design features that a more fully articulated and outstanding example from this period would display, such as carved bargeboards, diamond-pane windows, brick veneer, and roof-ridge dovecotes. Building 2 is a substantially altered single-family residence originally built in 1920 and remodeled in 1965 with Ranch-style elements that include horizontally sliding metal-sash windows. The Ranch style was common among residences constructed between 1945 and 1970 in the Antelope Valley, and neither Building 1 nor Building 2 represents an exceptional example of this style. The remainder of the buildings on the property are undistinguished rural, utilitarian buildings, including the detached garage (Building 3), barn (building 4), storage buildings (Building 5 and 6), and stables (Building 7). The five irrigation features are standard engineering features extremely common in the Antelope Valley and in the state. Therefore, none of the buildings or structures at 43200 40th Street East possess sufficient design and construction value to meet California Register Criterion 3.

Criterion 4: The property at 43200 40th Street East does not appear to be significant as a source, or likely source, of important historical information, nor does it appear likely to yield important information about historical construction methods, materials, or technologies. This technology is well understood through contemporary trade journals and scientific monographs. As such, the property appears to lack significance under California Register Criterion 4.

In conclusion, none of the built resources at 43200 40th Street East meet the criteria for listing in the California Register, and none are considered historical resources for the purposes of CEQA pursuant to PRC Section 5024.1 and CCR Section 15064.5(a).

7 FINDINGS

7.1 OVERLAY ZONE

The mapped rock formations within the Overlay Zone, excluding the Cannabis Facility site, consist of alluvium of Holocene to late Pleistocene age and eolian deposits of Holocene age. The Overlay Zone has a low potential to disturb paleontological resources within undisturbed bedrock, with sensitivity increasing with depth.

The SCCIC records search, literature review, field survey, and interested parties consultation identified seven historic-period archaeological sites (**Table 6**) and six assessor parcels with documented historic-aged buildings (**Table 7**) located within the Overlay Zone. A map of the documented archaeological sites is included in confidential **Appendix F**. If future proposed projects have the potential to impact these or other resources, they will require evaluation for inclusion in the California Register and/or National Register. Further, a Phase I cultural resources study will be required for each project to identify potential unknown resources that may be impacted by the project.

TABLE 6. ARCHAEOLOGICAL RESOURCES WITHIN THE OVERLAY ZONE

Primary Number	Permanent Trinomial	Description	Evaluation Status	Location within Project Site
P-19-003696	CA-LAN-3696	Can and bottle scatter	Unevaluated	Overlay Zone
P-19-003817	CA-LAN-003817H	Can and bottle dumps and borrow pit	Unevaluated	Overlay Zone
P-19-004157	CA-LAN-004157H	Foundation slabs, irrigation standpipes, pumphouse, domestic trees, fence lines, fallow agricultural fields, and refuse deposits associated with abandoned farmstead	Unevaluated	Overlay Zone
P-19-120054	None	Well, irrigation system, and refuse deposits	Unevaluated	Overlay Zone
P-19-120056	None	One obsidian flake and associated clam shell fragments	Unevaluated	Overlay Zone
P-19-120057	None	"Historic complex" including refuse deposit	Unevaluated	Overlay Zone
Pending	Pending	MBI-001H refuse deposit	Not eligible	Cannabis Facility

TABLE 7. HISTORIC BUILT RESOURCES WITHIN THE OVERLAY ZONE

APN	Address	Construction Date	Eligibility
3386-012-006	7166 East Avenue K	1930	Unevaluated
3384-017-001	6001 East Avenue K	1932	Unevaluated
3378-002-006	8717 East Avenue L	1933	Unevaluated
3376-026-002	9847 East Avenue K	1846*	Unevaluated
3170-012-002	43200 40th Street E	1964	Not eligible
3150-016-018	4566 East Avenue J	1947	Unevaluated

*Date is incorrect and the accurate built date is currently unknown.

By following the recommended mitigation measures PALEO-1, 2, 3, and 4, impacts of the Overlay Zone portion of the project to paleontological resources would be less than significant with mitigation incorporated.

Compliance with mitigation measure CUL-3 below will allow the formulation of mitigation measures to reduce cultural resource impacts of projects within the Overlay Zone to a less than significant level with mitigation incorporated.

7.2 CANNABIS FACILITY

Because the proposed development at the Cannabis Facility location has been mapped with a higher proportion of the older alluvial deposits (upwards of late Pleistocene in age), the site has a high potential to disturb paleontological resources within undisturbed bedrock. Significant vertebrate fossil localities have been recovered from geologic formations of similar age and depositional environments within 10 miles of the Cannabis Facility site.

The SCCIC records search, literature review, interested parties consultation, and pedestrian surveys identified one archaeological resource (MBI-001H) and one built environment resource (43200 40th Street East) (**Table 8**). These resources do not appear to meet the definition of historical resources as defined by PRC Section 5020.1(j), nor do they appear to meet the criteria for listing on the California Register (14 CCR Section 4850), nor do they appear to meet the definition of a "unique archeological resource" as defined in PRC Section 21083.2. As such, the project would have no impact on historical resources and no mitigation would be required. Therefore, no further work is recommended for these resources. There are no historical resources identified within the Cannabis Facility site.

TABLE 8. RESOURCES IDENTIFIED WITHIN THE CANNABIS FACILITY

Resource Name	Description	California Register Evaluation	Historical Resource
MBI-001H	Refuse scatter	Ineligible	No
43200 40th Street East	Farm property	Ineligible	No

As discussed in **Section 5.7** above, the Cannabis Facility has a low sensitivity for unknown buried cultural resources due to its distance from permanent sources of water and past disturbances. By following the recommended mitigation measures CUL-1 and CUL-2 and PALEO-1, 2, 3, and 4, impacts of the Cannabis Facility portion of the project to cultural and paleontological resources would be less than significant with mitigation incorporated.

8 RECOMMENDATIONS

8.1 PALEONTOLOGICAL RECOMMENDATIONS

Part-time paleontological monitoring, i.e. spot checking, is recommended during ground disturbance, at depths greater than 4 feet, in **undisturbed geologic contexts** which have the potential to contain significant paleontological resources. The frequency of part-time (spot check) monitoring will be determined by a qualified paleontologist based on the nature and depth of ground-disturbing activities taking place and the sediments encountered. Ground disturbance refers to activities that would impact subsurface geologic deposits, such as grading, excavation, boring, etc. Activities taking place at depths less than 4 feet, e.g., clearing and grubbing, or at the current topsoil surface, e.g., building renovations, do not require paleontological monitoring. If significant fossils are discovered during ground disturbance, it is recommended that monitoring transition from part-time to full-time. The following mitigation measures (MM) are recommended to be implemented such that in the event of any discovery of unknown paleontological resources during earthwork, impacts would be **less than significant**.

MM PALEO-1: The contractor must retain a Society of Vertebrate Paleontology (SVP) qualified paleontologist to provide or supervise a paleontological sensitivity training to all personnel planned to be involved with earth-moving activities, prior to the beginning of ground-disturbing activities. The training session will focus on how to identify paleontological localities such as fossils that may be encountered and the procedures to follow if identified.

MM PALEO-2: Prior to grading or excavation in sedimentary rock material other than topsoil, the contractor shall retain an SVP-qualified paleontologist to monitor these activities at depths of 4 feet below present grade or greater. In the event that fossils are discovered during grading at any depth, the on-site construction supervisor shall be notified and shall redirect work away from the location of the discovery. The recommendations of the paleontologist shall be implemented with respect to the evaluation and recovery of fossils, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the fossil discovery.

MM PALEO-3: If the fossils are determined to be significant, then the SVP-qualified paleontologist shall prepare and implement a data recovery plan. The plan shall include, but not be limited to, the following measures:

- The paleontologist shall ensure that all significant fossils collected are cleaned, identified, catalogued, and permanently curated with an appropriate institution with a research interest in the materials (which may include the Natural History Museum of Los Angeles County);
- The paleontologist shall ensure that specialty studies are completed, as appropriate, for any significant fossil collected; and

- The paleontologist shall ensure that curation of fossils is completed in consultation with the City. A letter of acceptance from the curation institution shall be submitted to the City.

MM PALEO-4: If any paleontological resources are encountered during construction or the course of any ground-disturbance activities, all such activities shall halt immediately. At this time, the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. The assessment will follow SVP standards as delineated in the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* (2010). If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be infeasible by the City. If avoidance is infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

A qualified professional paleontologist is a professional with a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California, as well as at least one year of full-time professional experience or equivalent specialized training in paleontological research (i.e., the identification of fossil deposits, application of paleontological field and laboratory procedures and techniques, and curation of fossil specimens), and at least four months of supervised field and analytic experience in general North American paleontology as defined by the SVP.

8.2 CULTURAL RESOURCES RECOMMENDATIONS

Impacts to cultural resources may be avoided or reduced to a less than significant level by implementing the following recommendations:

MM CUL-1: If archaeological material is uncovered in the course of ground-disturbing activities, work shall be temporarily halted in the vicinity of the find (within a 60-foot buffer) and the project proponent shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology to evaluate the significance of the find and recommend appropriate treatment for the resource in accordance with California Public Resources Code Section 21083.2(i) and the provisions of the California Environmental Quality Act (CEQA). The qualified archaeologist shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following shall apply:

- If the qualified archaeologist determines the find does not represent a cultural resource, work may resume, and no agency notifications are required. A record of the archaeologist's determination shall be made in writing to the City.
- If the qualified archaeologist determines that the find does represent a cultural resource and is considered potentially eligible for listing on the California Register, and avoidance is not feasible, then the City shall be notified and a

qualified archaeologist shall prepare and implement appropriate treatment measures. The treatment measures may consist of data recovery excavation of a statistically significant part of those portions of the site that will be damaged or destroyed by the project. Work cannot resume within the no-work radius until the lead agency (the City), through consultation as appropriate, determines that the find is either not eligible for the California Register, or that appropriate treatment measures have been completed to the satisfaction of the City.

- Additionally, if the resource is prehistoric or historic-era and of Native American origin, as determined by a qualified professional archaeologist, then those Native American tribes that have requested consultation on the project pursuant to California Public Resources Code Section 21080.3.1 shall be notified of the find, and shall consult on the eligibility of the resource and the appropriate treatment measures.

MM CUL-2: If human remains are encountered, work within 60 feet of the remains will be suspended and the Los Angeles County coroner contacted. If the remains are deemed Native American in origin, the coroner will contact the Native American Heritage Commission and identify a most likely descendant pursuant to Public Resources Code Section 5097.98 and California Code of Regulations Section 15064.5. If avoidance is not feasible, then the City shall be notified and a qualified archaeologist shall prepare and implement appropriate treatment measures as determined by the City in consultation with the most likely descendant.

MM CUL-3: Future projects planned within the Overlay Zone outside the Cannabis Facility site will require an additional Phase I cultural resources study. Depending upon the nature of the study, it will be prepared by a qualified archaeologist and/or architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, architectural history, and/or history. The study will include an identification effort including, at minimum, a South Central Coastal Information System records search, literature review, field survey, interested parties consultation, and buried site sensitivity analysis. Any cultural resource greater than 45 years of age that may be impacted by the project shall be evaluated for their eligibility for inclusion in the California Register of Historical Resources and/or National Register of Historic Places. Additional mitigation measures may be developed depending on the results of that study.

9 PROFESSIONAL QUALIFICATIONS

This report was prepared by Michael Baker International Archaeologists Marc Beherec, Kholood Abdo, and Jacob Parsley; Architectural Historian Monte Kim; and Paleontologist Peter Kloess. Archaeologists Kholood Abdo, Epifanio Figueroa, and Marc Beherec conducted the field survey and site recordation. Michael Baker International Cultural Resources Department Manager Margo Nayyar conducted quality assurance review.

Marc A. Beherec, PhD, RPA, Principal Investigator/Senior Archaeologist, has more than 20 years of experience in prehistoric and historical archaeology and cultural resources management. His experience includes writing technical reports, including National Environmental Policy Act (NEPA), NHPA, and CEQA compliance documents. He has supervised and managed all phases of archaeological fieldwork, including survey, Phase II testing and evaluations and Phase III data recovery, and monitoring at sites throughout Southern California. Dr. Beherec meets the Secretary of the Interior's Professional Qualification Standards for prehistory and historical archaeology.

Kholood Abdo, MA, RPA, has worked as an archaeologist in cultural resource management since 1999. She meets the Secretary of the Interior's Professional Qualification Standards for historical archaeology. She has years of experience recording, excavating, and evaluating historic archaeological sites. Ms. Abdo participated in or managed survey, testing, and data recovery at numerous historic archaeological sites throughout southern and central California and Arizona. Her field and laboratory experiences includes the recordation and evaluation of nineteenth- and twentieth-century sites within several urban and remote settings in California, including downtown Santa Barbara, San Luis Obispo, Santa Maria, San Bernardino's historic Chinatown, Sacramento, Yosemite National Park, and Los Angeles. Her experience includes survey, recordation, cultural material analysis, archaeological site inventory, and evaluation. Ms. Abdo has written and contributed to scores of technical reports, including NEPA, NHPA, and CEQA compliance documents.

Monte Kim, PhD, is a senior architectural historian and technical manager. He specializes in environmental and technical reviews and has experience in all phases of regulatory compliance under NHPA Section 106, Section 4(f) of the Department of Transportation Act, NEPA, and CEQA. He has more than 20 years of professional experience and meets the Secretary of the Interior's professional qualifications standards in history and architectural history. He has experience in the inventory and evaluation of resources within the historic built environment, as well as the assessment of effects on historic properties. He has authored or co-authored nominations for the National Register and has overseen the documentation of historic properties in accordance with the standards required for the Historic American Buildings Survey and the Historic American Engineering Record, and he has developed and managed the implementation of mitigation measures, treatment plans, resource-specific protection plans, and interpretive plans for large, transportation-related projects. Additionally, he has experience consulting with State Historic Preservation Officers and drafting programmatic agreements and memorandum of agreement documents for government agencies.

Peter Kloess, MA, has over 20 years of experience in paleontology, with seven years in paleontology mitigation working as a project paleontologist and project coordinator. His experience includes public and private consultation, field monitoring, excavation, and laboratory research on projects across the western

United States, predominantly in California. He has consulting experience with a range of projects, including construction, transportation, utility, transmission, monitoring, and surveys, as well as experience recovering a diversity of fossils from project sites, such as marine invertebrates, microfossils, plants, small mammals and birds, large marine and terrestrial mammals, and dinosaurs. In addition to extensive field and curation work, Mr. Kloess has researched, written, and published articles for paleontology publications. Several of his research projects have relied on paleontology and modern comparative collections housed in institutions across California, spanning geologic time from the Cretaceous period to present. He meets the SVP Standards for Qualified Professional Paleontologist.

Jacob Parsley, BA, has worked in various capacities in cultural resource management since 2018. He has participated in projects in several phases of archaeology: Phase I pedestrian surveys and Extended Phase I shovel test surveys, Phase II testing, Phase III data recovery, and Phase IV monitoring. His project highlights include archaeological surveying to update and verify cultural resources found mostly in remote areas of California, many of which have included prehistoric components. Other project responsibilities include identifying and flagging historic and prehistoric resources, delineating best access routes and conducting post impact assessments, and reporting.

Epifanio Figueroa, BA, RA, has worked in various capacities in cultural resource management since 2001. He has worked as a staff archaeologist and lab assistant on various projects located in Cyprus and the southwestern states of Arizona and California, performing tasks such as site identification and recordation, developing digital survey databases using Survey123, artifact cataloging, geophysical data collection, figure development, stratigraphy mapping, and report writing. Additionally, Mr. Figueroa has worked as a full-time staff geophysicist for approximately five years in both Pennsylvania and California gathering and analyzing geophysical data.

Margo Nayyar, Senior Cultural Resources Manager, is a senior architectural historian with 12 years of cultural management experience in California, Nevada, Arizona, Texas, Idaho, and Mississippi. Her experience includes built environment surveys, evaluation of historic-era resources using guidelines outlined in the National and California Registers, and preparation of cultural resources technical studies pursuant to CEQA and NHPA Section 106, including identification studies, finding of effect documents, memorandum of agreements, programmatic agreements, and Historic American Buildings Survey/Historic American Engineering Record/Historic American Landscapes Survey mitigation documentation. She prepares cultural resources sections for CEQA environmental documents, including infill checklists, initial studies, and environmental impact reports, as well as NEPA environmental documents, including environmental impact statements and environmental assessments. She also specializes in municipal preservation planning, historic preservation ordinance updates, Native American consultation, and provision of Certified Local Government training to interested local governments. She develops Survey 123 and Esri Collector applications for large-scale historic resources surveys, and authors National Register nomination packets. Ms. Nayyar meets the Secretary of the Interior's Professional Qualification Standards for history and architectural history.

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Michael Baker
INTERNATIONAL

Appendix A
Natural History Museum of Los Angeles County Records Search Results

Natural History Museum
of Los Angeles County
900 Exposition Boulevard
Los Angeles, CA 90007

tel 213.763.DINO
www.nhm.org

Research & Collections

e-mail: paleorecords@nhm.org

June 19, 2022

Michael Baker International

Attn: Marc Beherec

re: Paleontological resources for the Lancaster East Side Project (188955).

Dear Marc:

I have conducted a thorough search of our paleontology collection records for the locality and specimen data for proposed development at the Lancaster East Side project area as outlined on the portion of the Alpine Butte USGS topographic quadrangle map that you sent to me via e-mail on June 6, 2022. We do not have any fossil localities that lie directly within the proposed project area, but we do have fossil localities nearby from the same sedimentary deposits that occur in the proposed project area, either at the surface or at depth.

The following table shows the closest known localities in the collection of the Natural History Museum of Los Angeles County (NHMLA).

Locality Number	Location	Formation	Taxa	Depth
LACM VP 7884	E of the SE corner of the intersection of East 3rd Street & East Avenue H-13	Unknown formation (Pleistocene; fluvial brown clayey silt)	Camel (*Camelops hesternus*)	4 feet bgs
LACM VP 7853	Waste Management of North America Lancaster Landfill	Unknown formation (Pleistocene; sandy loess under a dune deposit strand, sandy siltstone, siltstone to clayey siltstone)	Rabbit (*Sylvagus*), camel family (Camelidae), antelope squirrel (*Ammospermophilus*), kangaroo rat (*Dipodymus*), pocket mouse (*Perognathus*), pack rat (*Neotoma*), deer mouse (*Peromyscus*), vole family (Microtinae), iguana (*Dipsosaurus*), pocket gopher (*Thomomys*), spiny lizard (*Sceloporus*), side blotched lizard (*Uta*), colubrid snakes (*Trimorphodon, Masticophis, Phyllorhynchus*), night lizard (*Xantusia*), western alligator lizard (*Elgaria*), toothy skinks	3-11 feet bgs

			(*Plestiodon*), whiptail lizard (*Aspidocelis*), spiny lizards (Phrynosomatidae), smelt (Osmeridae)	
LACM VP CIT451	Near intersection of E Barrel Springs Rd & 47th St E (Palmdale Quad)	Harold Formation	Mastodon (Mammutidae), horse family (Equidae)	Unknown
LACM VP 5942-5950	Along Avenue S from Palmdale to Lake Los Angeles	Unknown formation (Holocene)	Kingsnake (*Lampropeltis*), Lizard (Lacertilia), leopard lizard (*Gambelia*); snake (Ophidia), gopher snake (*Pituophis*); rabbit (*Lagomorpha*), rodent (Rodentia), Pocket gopher (*Thomomys*), pocket mouse (*Chaetodippus*), kangaroo rat (*Dipodomys*); birds (Aves)	0-9 feet bgs
LACM VP 7891	near the California Aqueduct between the Tehachapi Mountains & the Rosamond Hills north of Willow Springs	Unknown formation (Pleistocene)	Camel (*Hemiauchenia*)	21 feet bgs
LACM VP 7786	Southern California Logistics Airport	Alluvium (Pleistocene, moderately indurated fine to medium grained silty sandstone)	Vole (*Microtus mexicanus*)	10-11 feet bgs

VP, Vertebrate Paleontology; IP, Invertebrate Paleontology; bgs, below ground surface

This records search covers only the records of the NHMLA. It is not intended as a paleontological assessment of the project area for the purposes of CEQA or NEPA. Potentially fossil-bearing units are present in the project area, either at the surface or in the subsurface. As such, NHMLA recommends that a full paleontological assessment of the project area be conducted by a paleontologist meeting Bureau of Land Management or Society of Vertebrate Paleontology standards.

Sincerely,

Alyssa Bell, Ph.D.
Natural History Museum of Los Angeles County

enclosure: invoice

Michael Baker
INTERNATIONAL

Appendix B
Native American Heritage Commission Coordination

NATIVE AMERICAN HERITAGE COMMISSION

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

May 25, 2022

Epifanio Figueroa
Michael Baker International

Via Email to: Epifanio.Figueroa@mbakerintl.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Lancaster East Side EIR Project, Los Angeles County

Dear Epifanio Figueroa:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

  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 in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Cody.Campagne@nahc.ca.gov.

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Tribal Consultation List
Los Angeles County
5/25/2022

Fernandeno Tataviam Band of Mission Indians
Jairo Avila, Tribal Historic and Cultural Preservation Officer
1019 Second Street, Suite 1 — Tataviam
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
jairo.avila@tataviam-nsn.us

Fernandeno Tataviam Band of Mission Indians
Rudy Ortega, Tribal President
1019 Second Street, Suite 1 — Tataviam
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
rortega@tataviam-nsn.us

Kern Valley Indian Community
Robert Robinson, Chairperson
P.O. Box 1010 — Kawaiisu
Lake Isabella, CA, 93240 — Tubatulabal
Phone: (760) 378 - 2915 — Koso
bbutterbredt@gmail.com

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Road — Cahuilla
Banning, CA, 92220 — Serrano
Phone: (951) 755 - 5110
Fax: (951) 755-5177
abrierty@morongo-nsn.gov

Morongo Band of Mission Indians
Ann Brierty, THPO
12700 Pumarra Road — Cahuilla
Banning, CA, 92220 — Serrano
Phone: (951) 755 - 5259
Fax: (951) 572-6004
abrierty@morongo-nsn.gov

Quechan Tribe of the Fort Yuma Reservation
Jill McCormick, Historic Preservation Officer
P.O. Box 1899 — Quechan
Yuma, AZ, 85366
Phone: (760) 572 - 2423
historicpreservation@quechantribe.com

San Fernando Band of Mission Indians
Donna Yocum, Chairperson
P.O. Box 221838 — Kitanemuk
Newhall, CA, 91322 — Vanyume
Phone: (503) 539 - 0933 — Tataviam
Fax: (503) 574-3308
ddyocum@comcast.net

San Manuel Band of Mission Indians
Jessica Mauck, Director of Cultural Resources
26569 Community Center Drive — Serrano
Highland, CA, 92346
Phone: (909) 864 - 8933
Jessica.Mauck@sanmanuel-nsn.gov

Serrano Nation of Mission Indians
Wayne Walker, Co-Chairperson
P. O. Box 343 — Serrano
Patton, CA, 92369
Phone: (253) 370 - 0167
serranonation1@gmail.com

Serrano Nation of Mission Indians
Mark Cochrane, Co-Chairperson
P. O. Box 343 — Serrano
Patton, CA, 92369
Phone: (909) 528 - 9032
serranonation1@gmail.com

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Lancaster East Side EIR Project, Los Angeles County.

Michael Baker
INTERNATIONAL

Appendix C
Historical Society Consultation

Michael Baker
INTERNATIONAL

We Make a Difference

June 9, 2022

WEST ANTELOPE VALLEY HISTORICAL SOCIETY
P.O. BOX 1972
LANCASTER, CA 92529-1972
VIA EMAIL: PEGGY@AVHISTORICALORG

RE: LANCASTER EASTSIDE PROJECT, LANCASTER, LOS ANGELES COUNTY, CALIFORNIA

Dear West Antelope Valley Historical Society:

Michael Baker International is conducting a cultural resources study in support of the Lancaster Eastside Project (project) in the City of Lancaster, California (see **Attachment 1**).

The City of Lancaster (City) proposes a two-component project (project) consisting of 1) the development of a Light Industrial Overlay Zone in the eastern portion of Lancaster and 2) the development of a cannabis facility with the proposed overlay zone.

Component 1 of the project consists of the establishment of a Light Industrial Overlay Zone in the eastern portion of Lancaster over the predominantly RR-2.5 (Rural Residential, 1 du/ac) zoned project site. Anticipated allowed light industrial uses include those currently allowed under the Light Industrial (LI) zoned areas under Municipal Code Section 17.16.040, *Permitted Uses – I Zones*, as well as commercial cannabis activity development potential in the underutilized eastern portion of Lancaster (see **Attachment 2**).

Component 2 consists of the development of a cannabis facility at 43200 40th street East (Assessor's Parcel Number [APN] 3170-012-002) within the proposed overlay zone (see **Attachment 3**). The site is approximately 480 acres and would have a maximum buildout of up to 200,000 square feet. The proposed cannabis facility would include cultivation, manufacturing, distribution, and retail delivery activities. Grow areas would occur in hoop houses and traditional tractors and agricultural farming equipment would be utilized on-site. Existing buildings and structures on the site may be demolished for the project. The cannabis facility is the only site-specific cannabis facility to be analyzed at a project-level of detail within the Environmental Impact Report. Additional future proposed cannabis facilities within the overlay zone would be analyzed under a separate, stand-alone CEQA document at the time such development application(s) are received.

The project is an action regulated by the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) is being prepared for the project. The City is lead agency.

The purpose of this letter is to request your help identifying any historical resources which may be impacted by the proposed project. Please notify us if your organization has any information or concerns about historical resources within the Overlay Zone or the Cannabis Facility site. This is not a request for research; it is solely a request for public input related to any concerns that the Western Antelope Valley Historical Society may have. To ensure your concerns are taken into consideration, we request that you contact us no more than 30 days from the receipt of this letter.

Michael Baker
INTERNATIONAL

We Make a Difference

If you have any questions or comments, please contact me at your earliest convenience at marc.beherec@mbakerintl.com or 951-296-7561. Thank your assistance.

Sincerely,

Marc Beherec, Ph.D., RPA | Principal Investigator, Archaeology
801 South Grand Avenue, Suite 250 | Los Angeles, CA 90017 | 951-296-7561
marc.beherec@mbakerintl.com | www.mbakerintl.com

Attachments:
Attachment 1 - Figure 1: Regional Vicinity Map
Attachment 2 - Figure 2: Light Industrial Overlay Zone Map
Attachment 3 - Figure 3: Cannabis Facility Map

PN: 188955

★ Project Location

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

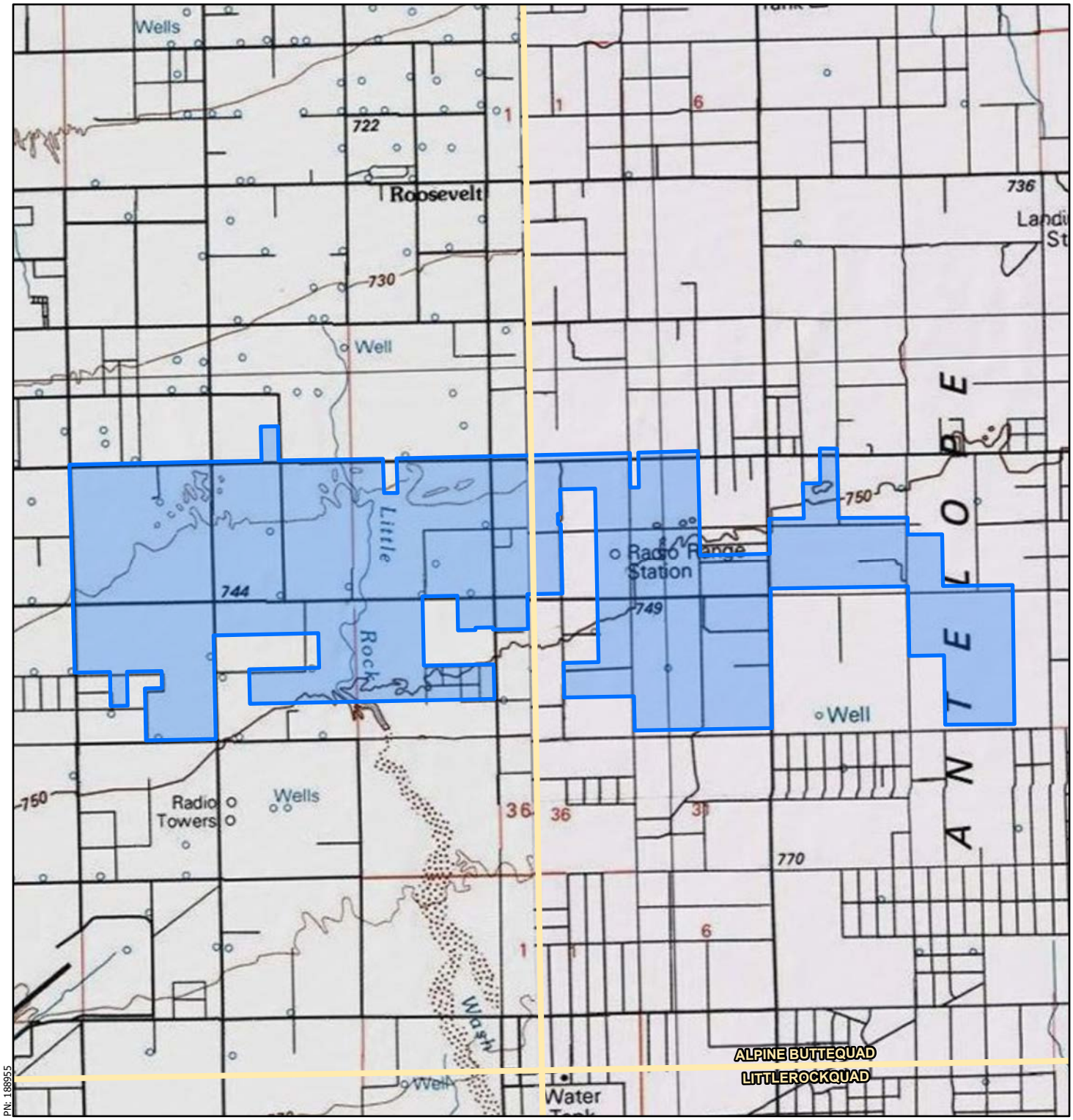
N

0 2.5 5 10 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Lancaster, California*

Regional Vicinity

Figure 1



Light Industrial Overlay Zone

LANCASTER EAST / ALPINE BUTTE USGS 7.5-MINUTE TOPO QUAD

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

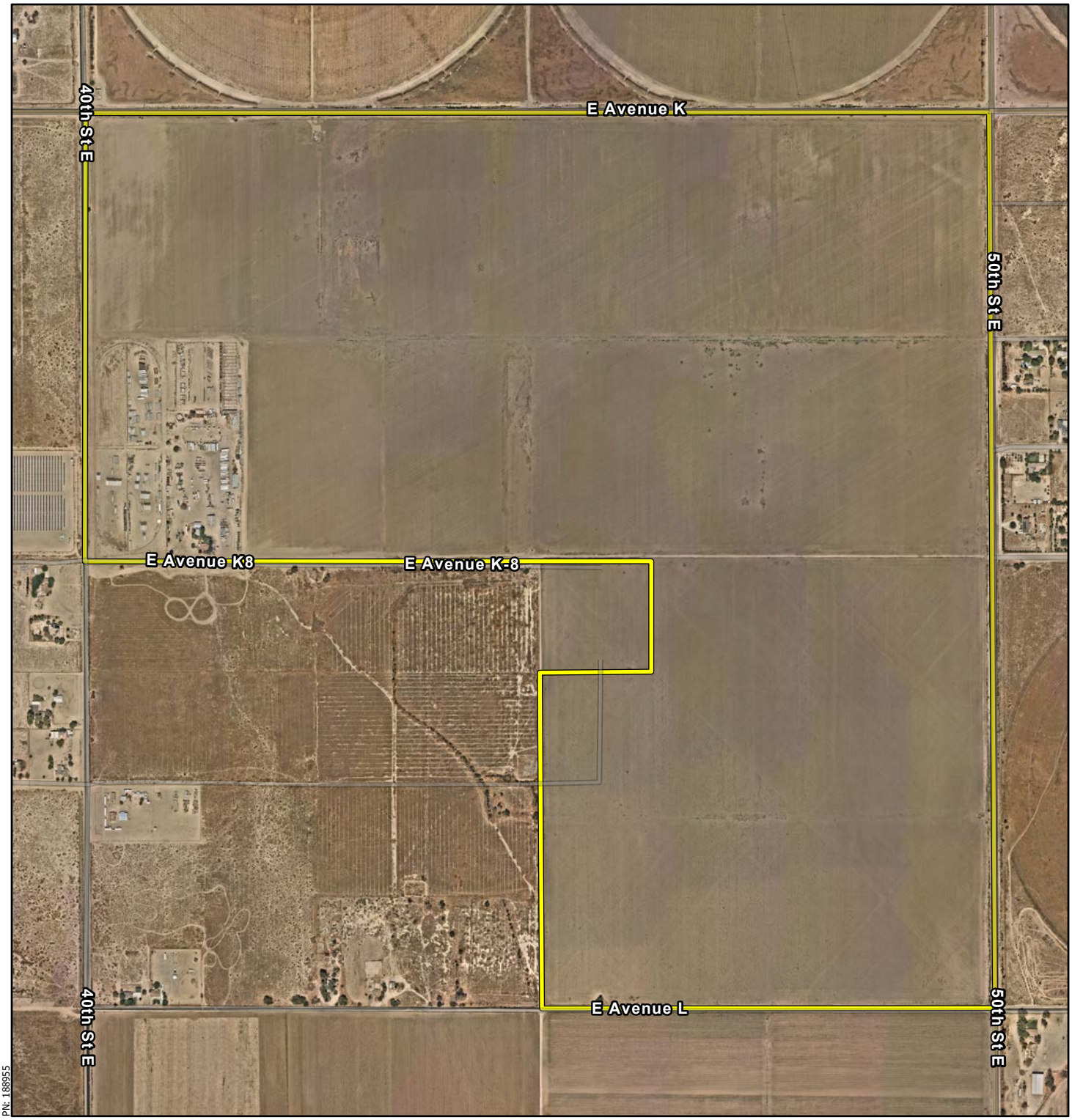
N

0 0.5 1 2 Miles

Source: Esri, ArcGIS Online, USGS 7.5-Minute topographic quadrangle maps: *Lancaster, California*

Light Industrial Overlay Zone

Figure 2



Cannabis Facility

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

N

0 250 500 1,000 Feet

Source: Esri, ArcGIS Online, 2021 Nearmap Imagery: *Lancaster, California*

Cannabis Facility

Figure 3

Michael Baker
INTERNATIONAL

Appendix D
South Central Coastal Information Center Records Search Results

(Confidential)

Michael Baker
INTERNATIONAL

Appendix E
DPR Forms

(Confidential)

Michael Baker
INTERNATIONAL

Appendix F
Map: Archaeological Resources within the Overlay Zone

(Confidential)

44933 Fern Avenue
Lancaster, CA 93534
661.723.6000
cityoflancasterca.org

May 31, 2022

San Manuel Band of Mission Indians
Attn: Ryan Nordness, Cultural Resource Analyst
26569 Community Center Drive
Highland, CA 92346

RE: Initial Native American Consultation for the Lancaster East Side Project EIR, Lancaster, Los Angeles County, California

Dear Mr. Nordness:

The City of Lancaster (City) is proposing a two-part project consisting of an overlay zone and cannabis facility in the eastern portion of Lancaster. The project site consists of two components within the eastern portion of Lancaster: 1) an approximately 5,841-acre area identified as the overlay zone, and 2) a 480-acre area within the overlay zone identified as the proposed cannabis facility site. The overlay zone and proposed cannabis facility site together makeup the "project site." The two project components are described in further detail below:

Light Industrial Overlay Zone

The City is proposing to establish a Light Industrial Overlay Zone in the eastern portion of Lancaster over the predominantly RR-2.5 (Rural Residential, 1 du/ac) zoned project site. The overlay zone is generally bound by Avenue J to the north, 110th Street East to the east, Avenue L to the south, and 40th Street East to the west. The proposed cannabis facility is located within the overlay zone at 43200 40th Street East and is an L-shaped parcel (Assessor's Parcel Number [APN] 3170-012-002) generally bound by Avenue K to the north, 50th Street East to the east, Avenue L to the south, and 40th Street East to the west. Anticipated allowed light industrial uses would include, but are not limited to alternative energy, commercial cannabis activity, distribution, light manufacturing, research and development and warehousing. The intent of the overlay zone is to allow more flexibility and development potential in the underutilized eastern portion of Lancaster.

Cannabis Facility

A project Applicant is proposing to develop a cannabis facility at 43200 40th Street East (Assessor's Parcel Number [APN] 3170-012-002) within the proposed overlay zone. The site is approximately 480 acres and would have a maximum buildout of up to 200,000 square feet. The proposed cannabis facility would include cultivation, manufacturing, distribution, and retail delivery activities. Grow areas would occur in hoop houses and traditional tractors and agricultural farming equipment would be utilized on-site.

The proposed program must comply with California Public Resources Code § 21080.3.1 (Assembly Bill 52 of 2014 [AB 52]), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

Your input is important to the City's planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish you consult on the proposed program. If you require any additional information or have any questions, please contact me via e-mail at ccampana@cityoflancasterca.gov.

Thank you for your assistance.

Sincerely,

Cynthia Campana
Senior Planner
City of Lancaster

Enclosure: Project Vicinity Map

44933 Fern Avenue
Lancaster, CA 93534
661.723.6000
cityoflancasterca.org

May 31, 2022

Fernandeno Tataviam Band of Mission Indians
Jairo Avila, Tribal Historic and Cultural Preservation Officer
1019 Second Street, Suite 1
San Fernando, CA, 91340

RE: Initial Native American Consultation for the Lancaster East Side Project EIR, Lancaster, Los Angeles County, California

Dear Mr. Avila:

The City of Lancaster (City) is proposing a two-part project consisting of an overlay zone and cannabis facility in the eastern portion of Lancaster. The project site consists of two components within the eastern portion of Lancaster: 1) an approximately 5,841-acre area identified as the overlay zone, and 2) a 480-acre area within the overlay zone identified as the proposed cannabis facility site. The overlay zone and proposed cannabis facility site together makeup the "project site." The two project components are described in further detail below:

Light Industrial Overlay Zone

The City is proposing to establish a Light Industrial Overlay Zone in the eastern portion of Lancaster over the predominantly RR-2.5 (Rural Residential, 1 du/ac) zoned project site. The overlay zone is generally bound by Avenue J to the north, 110th Street East to the east, Avenue L to the south, and 40th Street East to the west. The proposed cannabis facility is located within the overlay zone at 43200 40th Street East and is an L-shaped parcel (Assessor's Parcel Number [APN] 3170-012-002) generally bound by Avenue K to the north, 50th Street East to the east, Avenue L to the south, and 40th Street East to the west. Anticipated allowed light industrial uses would include, but are not limited to alternative energy, commercial cannabis activity, distribution, light manufacturing, research and development and warehousing. The intent of the overlay zone is to allow more flexibility and development potential in the underutilized eastern portion of Lancaster.

Cannabis Facility

A project Applicant is proposing to develop a cannabis facility at 43200 40th Street East (Assessor's Parcel Number [APN] 3170-012-002) within the proposed overlay zone. The site is approximately 480 acres and would have a maximum buildout of up to 200,000 square feet. The proposed cannabis facility would include cultivation, manufacturing, distribution, and retail delivery activities. Grow areas would occur in hoop houses and traditional tractors and agricultural farming equipment would be utilized on-site.

The proposed program must comply with California Public Resources Code § 21080.3.1 (Assembly Bill 52 of 2014 [AB 52]), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

Your input is important to the City's planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish you consult on the proposed program. If you require any additional information or have any questions, please contact me via e-mail at ccampana@cityoflancasterca.gov.

Thank you for your assistance.

Sincerely,

Cynthia Campana
Senior Planner
City of Lancaster

Enclosure: Project Vicinity Map

44933 Fern Avenue
Lancaster, CA 93534
661.723.6000
cityoflancasterca.org

May 31, 2022

Gabrieleño Band of Mission Indians – Kizh Nation
Attn: Andrew Salas, Chairman
PO Box 393
Covina, CA 91723

RE: Initial Native American Consultation for the Lancaster East Side Project EIR, Lancaster, Los Angeles County, California

Dear Mr. Salas:

The City of Lancaster (City) is proposing a two-part project consisting of an overlay zone and cannabis facility in the eastern portion of Lancaster. The project site consists of two components within the eastern portion of Lancaster: 1) an approximately 5,841-acre area identified as the overlay zone, and 2) a 480-acre area within the overlay zone identified as the proposed cannabis facility site. The overlay zone and proposed cannabis facility site together makeup the "project site." The two project components are described in further detail below:

Light Industrial Overlay Zone

The City is proposing to establish a Light Industrial Overlay Zone in the eastern portion of Lancaster over the predominantly RR-2.5 (Rural Residential, 1 du/ac) zoned project site. The overlay zone is generally bound by Avenue J to the north, 110th Street East to the east, Avenue L to the south, and 40th Street East to the west. The proposed cannabis facility is located within the overlay zone at 43200 40th Street East and is an L-shaped parcel (Assessor's Parcel Number [APN] 3170-012-002) generally bound by Avenue K to the north, 50th Street East to the east, Avenue L to the south, and 40th Street East to the west. Anticipated allowed light industrial uses would include, but are not limited to alternative energy, commercial cannabis activity, distribution, light manufacturing, research and development and warehousing. The intent of the overlay zone is to allow more flexibility and development potential in the underutilized eastern portion of Lancaster.

Cannabis Facility

A project Applicant is proposing to develop a cannabis facility at 43200 40th Street East (Assessor's Parcel Number [APN] 3170-012-002) within the proposed overlay zone. The site is approximately 480 acres and would have a maximum buildout of up to 200,000 square feet. The proposed cannabis facility would include cultivation, manufacturing, distribution, and retail delivery activities. Grow areas would occur in hoop houses and traditional tractors and agricultural farming equipment would be utilized on-site.

The proposed program must comply with California Public Resources Code § 21080.3.1 (Assembly Bill 52 of 2014 [AB 52]), which requires local governments to conduct meaningful consultation with California Native American tribes that have requested to be notified by lead agencies of proposed projects in the geographic area with which the tribe is traditionally and culturally affiliated.

Your input is important to the City's planning process. Under AB 52, you have 30 days from receipt of this letter to respond in writing if you wish you consult on the proposed program. If you require any additional information or have any questions, please contact me via e-mail at ccampana@cityoflancasterca.gov.

Thank you for your assistance.

Sincerely,

Cynthia Campana
Senior Planner
City of Lancaster

Enclosure: Project Vicinity Map