



11.0 Appendices



11.1 NOP and Comment Letters



**NOTICE OF PREPARATION
EASTSIDE OVERLAY**

DATE: **OCTOBER 28, 2022**

TO: **STATE CLEARINGHOUSE AND INTERESTED PARTIES**

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

SUBJECT: **NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL
IMPACT REPORT (EIR) FOR THE EASTSIDE OVERLAY**

The City of Lancaster (City) is the lead agency in charge of environmental review for the Eastside Overlay. The City of Lancaster is preparing an Environmental Impact Report (EIR) for the proposed overlay. The City is soliciting comments from reviewing agencies and the public regarding the scope and content of the environmental document. For reviewing agencies, the City requests comments with respect to your agency's statutory responsibility as related to the proposed projects in accordance with California Code of Regulations, Title 14, Section 15082(b). Your agency may need to use the EIR when considering relevant permits or other approvals for the project. The City is also seeking the views of residents, property owners, developers, and concerned citizens regarding issues that should be addressed in the EIR.

Comment Period: Comments may be sent anytime during the 30-day Notice of Preparation (NOP) comment period. The NOP review and comment period begins on October 28, 2022 and ends on November 28, 2022. All comments must be received during the comment period and no later than 6:00 PM on November 28, 2022. Please include the name of a contact for your agency, if applicable. All comments should be directed to:

City of Lancaster
Attention: Cynthia Campana, Senior Planner
44933 Fern Avenue
Lancaster, California 93534

Comments may also be emailed to ccampana@cityoflancasterca.gov.

Scoping Meeting: Oral comments may be provided at the Scoping Meeting to be held on November 16, 2022 from 5:00 PM to 6:00 PM via zoom. The meeting link is: <https://cityoflancasterca-gov.zoom.us/j/85305233442>

Project Location:

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 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.

Project Description:

The project consists of two components: 1) development of a Light Industrial Overlay Zone in the eastern portion of Lancaster; and 2) development of a cannabis facility within the proposed overlay zone. 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/2.5 acres) zoned project site. Anticipated light industrial uses would include, but are not limited to alternative energy such solar and hydrogen, 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 allow for up to 200,000 square feet of cannabis related facilities. Cannabis grow area will be limited to the southern portion of the site. 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. This 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.

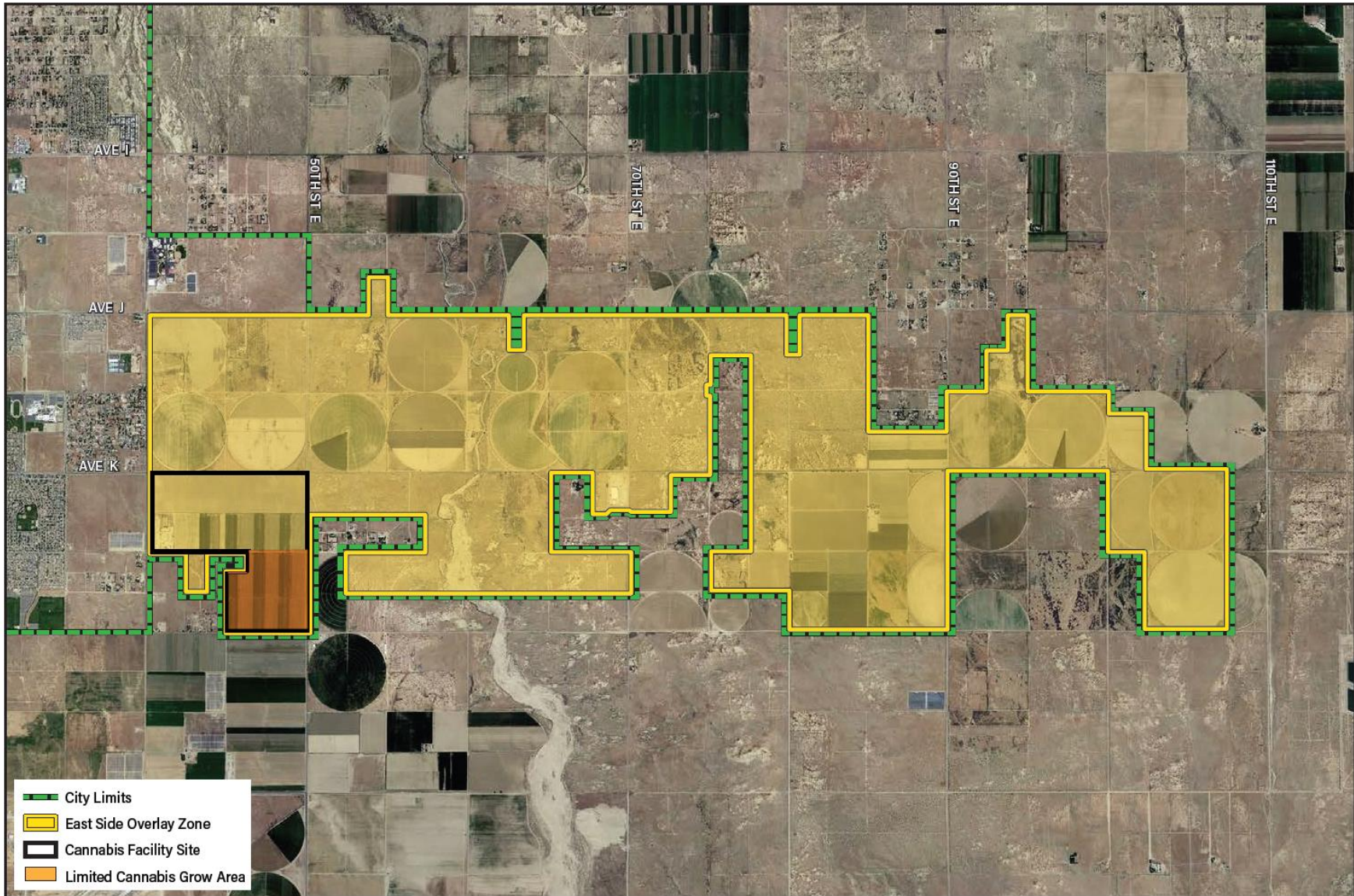
Environmental Review:

It is anticipated that the EIR will address potentially significant impacts associated the following topical areas:

- Aesthetics
- Air Quality and Greenhouse Gas Emissions

- Agriculture and Forestry Resources
- Biological Resources
- Cultural, Paleontological and Tribal Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities and Service Systems

Based on the proposed sites, the proposed project would not result in significant impacts with respect to; Mineral Resources; or Wildfires. Therefore, these topics will be address in the Effects Found Not To Be Significant Section of the EIR.



Source: Google Earth Pro, June 2022



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



November 28, 2022

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

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Eastside Overlay Project, City of Lancaster, Los Angeles County

Dear Ms. Campana:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) for the Eastside Overlay Project (Project) Environmental Impact Report (DEIR) prepared by the City of Lancaster (City) pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et. seq.)

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

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

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

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Project Location: 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 (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

Project Description/Objective: The Project consists of two components: 1) development of a Light Industrial Overlay Zone in the eastern portion of Lancaster; and 2) development of a cannabis facility within the proposed overlay zone.

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/2.5 acres) zoned project site. Anticipated light industrial uses would include, but are not limited to, alternative energy such as solar and hydrogen, commercial cannabis activity, distribution, light manufacturing, research and development, and warehousing.

Cannabis Facility: A project applicant is proposing to develop a cannabis facility at 43200 40th Street East (APN3170-012-002) within the proposed Overlay Zone. The site is approximately 480 acres and would allow for up to 200,000 square feet of cannabis related facilities. The proposed cannabis facility would include cultivation, manufacturing, distribution, and retail delivery activities. The cannabis grow area will be limited to the southern portion of the site. Grow areas would occur in hoop houses with traditional tractors and agricultural farming equipment to be utilized on-site.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Lancaster (Lead Agency) in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

CDFW also recommends the City include in the DEIR measures or revisions below in a science-based monitoring program that contains adaptive management strategies as part of the Project’s CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

Specific Comments

- 1) Natural Resources and Open Space Inventory. CDFW recommends the City prepare a map of the following areas if present within or adjacent to the Project boundary. In addition, the City should consider the Project’s potential impacts on the following areas if present within or adjacent to the Project boundary:
 - a) Conservation easements or mitigation lands;
 - b) U.S. Fish and Wildlife Service [Threatened & Endangered Species Active Critical Habitat](#) (USFWS 2020);

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- c) Sensitive Natural Communities [see General Comment #3 (Biological Baseline Assessment)];
- d) Aquatic and riparian resources including (but not limited to) rivers, channels, streams, wetlands, claypans, and associated natural plant communities, particularly Little Rock Wash;
- e) Open spaces and undeveloped natural areas that may serve as habitat for local wildlife species;
- f) Wildlife corridors; and,
- g) Urban forests, particularly areas with dense and large trees.

CDFW recommends the City avoid sites that may have a direct or indirect impact on conservation easements or lands set aside as mitigation. CDFW recommends the DEIR include measures where future development facilitated by the Project mitigates (avoid if feasible) for impacts on biological resources occurring within Significant Ecological Areas (SEAs) and critical habitat. Future development facilitated by the Project should also mitigate for impacts on wildlife corridors, sensitive natural communities, aquatic and riparian resources, and urban forests.

- 2) Development and Conservation. To accommodate further development, CDFW recommends the City maximize development where it already exists and avoid undeveloped areas in order to protect natural and working lands from development, habitat loss, and climate change. CDFW recommends the City consider regional and State-wide natural resource conservation strategies outlined in the following reports: [Safeguarding California Plan: 2018 Update](#) (CNRA 2018); [California State Wildlife Action Plan: A Conservation Legacy for Californians](#) (CDFW 2015); and, [California 2030 Natural and Working Lands Climate Change Implementation Plan: January 2019 Draft](#) (CalEPA et al. 2019).
- 3) Western Joshua tree. Western Joshua tree (*Yucca brevifolia*), a CESA-listed candidate species, is found throughout Antelope Valley and has potential to occur within the boundaries of the Overlay Zone. As a CESA candidate species, western Joshua tree is granted full protection of a threatened species under CESA. Grading of the Project site would likely result in “take” or adverse impacts to western Joshua tree, its seed bank, and its sole pollinator, the yucca moth (*Tegeticula synthetica*). Potential direct, indirect, and cumulative impacts to western Joshua tree should be evaluated in the DEIR. Focused surveys should be conducted for western Joshua tree and results included in the DEIR.

CDFW recommends the City avoid impacts to western Joshua tree to the greatest extent feasible. If “take” or adverse impacts to western Joshua trees cannot be avoided during Project activities or over the life of the Project, the City/applicant should consult CDFW to obtain additional Joshua tree survey requirements and determine if a CESA Incidental Take Permit (ITP) is required, pursuant to Fish and Game Code section 2080 *et seq.* Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. CDFW may require separate CEQA documentation for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

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- 4) Mohave Ground Squirrel. Mohave ground squirrel (*Xerospermophilus mohavensis*; MGS), a CESA-listed threatened species, has historically been found throughout Antelope Valley. Focused surveys should be conducted whenever a Project is taking place in appropriate habitat within the range of MGS and should follow CDFW's updated 2010 [Survey Guideline](#) (CDFW 2010b). Potential direct, indirect, and cumulative impacts to MGS should be evaluated in the DEIR. The Project and DEIR should be conditioned to avoid and/or mitigate potential impacts to MGS as well as habitat supporting each species and obtaining necessary state permits for any impacts. If "take" or adverse impacts to MGS cannot be avoided during Project activities or over the life of the Project, the City/applicant should consult CDFW to obtain an ITP pursuant to Fish and Game Code section 2080 *et seq.* Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. CDFW may require separate CEQA documentation for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 5) Nesting Birds. A review of California Natural Diversity Database (CNDDDB) identifies multiple historic records of sensitive bird species in and around the proposed Project area: Swainson's hawks (*Buteo swainsoni*), a CESA-listed threatened species (see Specific Comment #6 below); Burrowing owls (*Athene cuniculara*), a California Species of Special Concern (SSC; see Specific Comment #7 below); and mountain plover (*Charadrius montanus*), a California SSC.

Based on a review of satellite imagery, there is scattered vegetation throughout the Project site that may provide potential habitat where Project activities may impact nesting birds. CDFW recommends the DEIR include measures where future development facilitated by the Project avoids potential impacts to nesting birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment.

- a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
- b) CDFW recommends that measures be taken to fully avoid impacts to nesting birds and raptors. Ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating) and vegetation removal should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
- c) If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the DEIR include measures where future development facilitated by the Project mitigates for impacts. CDFW recommends surveys by a qualified biologist with experience conducting breeding bird and raptor surveys. Surveys are needed to detect protected native birds and raptors occurring in suitable nesting habitat that may be disturbed and any other

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such habitat within 300 feet of the Project disturbance area, to the extent allowable and accessible. For raptors, this radius should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 6) Swainson's Hawk. Swainson's hawks (*Buteo swainsoni*), a CESA-listed threatened species, are regularly observed foraging throughout Antelope Valley. A review of CNDDDB indicates that there are multiple historic records of Swainson's hawk observed in and around the proposed Overlay Zone.

CDFW recommends the City assess the Project site for possible Swainson's hawk foraging habitat and suitable nest sites. Potential direct, indirect, and cumulative impacts to Swainson's hawk should be evaluated in the DEIR. CDFW recommends the City proceed with a Swainson's hawk survey following the 2010 guidance on [Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California](#) (CDFW 2010a). A qualified raptor biologist with Swainson's hawk survey experience should conduct surveys in a manner that maximizes the potential to observe the adult Swainson's hawks and nests/chicks via visual and audible cues within a five-mile radius of the Project site. All potential nest trees within the five-mile radius should be surveyed for presence of nests. The Project and environmental document should be conditioned to avoid and/or mitigate for potential impacts to Swainson's hawks and habitat.

If "take" or adverse impacts to Swainson's hawk cannot be avoided during Project activities or over the life of the Project, the City/applicant should consult CDFW to obtain an ITP pursuant to Fish and Game Code section 2080 *et seq*. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit. CDFW may require separate CEQA documentation for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 7) Burrowing Owl. Burrowing owls (*Athene cuniculara*), a California Species of Special Concern (SSC), are known to regularly occur throughout the Lancaster area. CDFW recommends the City perform a protocol-level survey for burrowing owls adhering to survey methods described in CDFW's March 7, 2012, [Staff Report on Burrowing Owl Mitigation](#) (CDFW 2012). All survey efforts should be conducted by a qualified biologist. Survey protocol for breeding season owl surveys states to conduct four survey visits: 1) at least one site visit between February 15 and April 15, and 2) a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15. Full disclosure of the presence/absence of burrowing owls is necessary to help the City's determination of whether the Project would impact burrowing owls, thus requiring mitigation. Potential direct, indirect, and cumulative impacts to burrowing owl should be evaluated in the DEIR. The Project and environmental document should be conditioned to avoid and/or mitigate for potential impacts to burrowing owl and habitat.

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General Comments

- 1) Disclosure. An environmental document should provide an adequate, complete, and detailed disclosure about the effect which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the environmental document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the environmental document should provide an adequate, complete, and detailed disclosure about a project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to a project site and where a project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to a project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. A project-level environmental document should include the following information:

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- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. An environmental document should include measures to fully avoid and otherwise protect Sensitive Natural Communities from project-related impacts. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2020a);
- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at a project site and within the neighboring vicinity. The [Manual of California Vegetation](#) (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where project activities could lead to direct or indirect impacts off site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
- d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a project. CDFW's [California Natural Diversity Database](#) (CNDDDB) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2020b). An assessment should include a nine-quadrangle search of the CNDDDB to determine a list of species potentially present at a project site. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur in the project site. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
- e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of a project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2020c). Acceptable species-specific survey procedures may be developed in consultation with CDFW and the U.S. Fish and Wildlife Service;

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- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of a proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame or in phases; and,
 - g) A biological resources survey should include identification and delineation of any rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.
- 4) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2020d). The City should ensure data collected at a project-level has been properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred.
- 5) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:
- a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
 - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion on Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project sites. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible

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conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,

- f) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and vegetation communities. If the City determines that the Project would not have a cumulative impact, the environmental document should indicate why the cumulative impact is not significant. The City's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 6) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project;
 - b) CEQA Guidelines section 15126.6(a) states that an environmental document shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project. CEQA Guidelines section 15126.6(f)(2) states if the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion and should include reasons in the environmental document;
 - c) A range of feasible alternatives to Project component location and design features to avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas. CDFW recommends the City consider configuring Project construction and activities, as well as the development footprint, in such a way as to fully avoid impacts to sensitive and special status plants and wildlife species, habitat, and sensitive vegetation communities. CDFW also recommends the City consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes for the duration of the Project and from any future development. As a general rule, CDFW recommends reducing or clustering the development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6); and
 - d) Where the Project may impact aquatic and riparian resources, CDFW recommends the City consider alternatives that would fully avoid impacts to such resources. CDFW also recommends alternatives that would allow not impede, alter, or otherwise modify existing surface flow; watercourse and meander; and water-dependent ecosystems and vegetation communities. Project-related designs should consider elevated crossings to avoid channelizing or narrowing of streams. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the stream to alter its course of flow.

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- 7) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 8) Jurisdictional Waters. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to CDFW pursuant to Fish and Game Code Section 1600 *et seq.*
- a) CDFW's issuance of a Lake and Streambed Alteration (LSA) Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (Lead Agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA Agreement. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for information about LSA Notification (CDFW 2020e).
 - b) In the event the project area may support aquatic, riparian, and wetland habitats; a preliminary delineation of the streams and their associated riparian habitats should be included in the environmental document. The delineation should be conducted pursuant to the U.S. Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1970). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
 - c) In project areas which may support ephemeral or episodic streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of these resources and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately sized vegetated

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buffer areas adjoining ephemeral drainages.

- d) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the environmental document.
 - e) As part of the LSA Notification process, CDFW requests a hydrological evaluation of the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the environmental document evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 9) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."
- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project must include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions for the benefit to on-site and off-site wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in an environmental document and these measures should compensate for the loss of function and value.
 - b) The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).


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

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP for the Eastside Overlay Project DEIR. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at (562) 292-6821 or by email at Andrew.Valand@wildlife.ca.gov.

Sincerely,

DocuSigned by:

5991E19EF8094C3...

Victoria Tang acting for

Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region

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ec: California Department of Fish and Wildlife

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November 17, 2022

City of Lancaster
Attention: Cynthia Campana, Senior Planner
44933 Fern Avenue
Lancaster, CA 93534
ccampana@cityoflanasterca.gov

Re: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Eastside Overlay Project (SCH No. 2022100641)

Dear Ms. Campana:

Thank you for providing the California Department of Cannabis Control (DCC) the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) circulated by the City of Lancaster for the Eastside Overlay Project (Proposed Project).

DCC is a Responsible Agency with respect to the Proposed Project, with jurisdiction over the issuance of licenses to operate commercial cannabis businesses in California. DCC issues licenses to cannabis cultivators, nurseries, and processor facilities; cannabis manufacturing, testing, distribution, and retail facilities; and cannabis microbusinesses, where the local jurisdiction authorizes these activities. (Bus. & Prof. Code, § 26012(a).) All commercial cannabis businesses within California require a license from DCC. For more information pertaining to commercial cannabis business license requirements, including DCC regulations, please visit: <https://cannabis.ca.gov/cannabis-laws/dcc-regulations/>.

Background

The City of Lancaster is the Lead Agency on the Proposed Project. As described in the NOP, the project consists of two components: (1) development of a Light Industrial Overlay Zone in the eastern portion of Lancaster; and (2) development of a cannabis facility within the proposed overlay zone. The cannabis facility is the only site-specific cannabis facility proposed to be analyzed at a project level of detail within 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.

DCC Comments and Recommendations

In response to the NOP, DCC has several comments and recommendations about the anticipated scope of the EIR and issues the City should address and consider when preparing the EIR.

Comment 1: Scope of EIR. The NOP does not specify whether the EIR for the cannabis facility is intended to extend CEQA coverage to any later activities or projects by the applicant or potential future tenants approved to operate within individual units, or whether the scope of the EIR is intended to be solely for the construction of the cannabis facility at 43200 40th Street East, within the Eastside Overlay project site.

Note that DCC requires an annual-license applicant to provide operation-specific evidence of exemption from, or compliance with, CEQA (4 Cal. Code of Regs. § 15010). If a local jurisdiction prepares a site-specific CEQA compliance document, or record of decision for the conclusion that no further CEQA documentation is required, it improves the efficiency with which DCC can issue annual licenses for projects located within that jurisdiction.

Comment 2: Project Description. If the City intends the Proposed Project EIR to cover all cannabis business activities that would take place at the cannabis facility, DCC requests the City provide detailed assumptions for future operators' or tenants' proposed cannabis business activities as part of the EIR's Project Description. To the extent these details would be known, or could be provided as an estimation, assumption, and/or worst-case-scenario, the project description should include operation details for cannabis businesses, including:

- the proposed canopy size of any cultivation operations and the types of operations and cultivation methods that would occur on site;
- the types of any manufacturing activities that would occur on site;
- the expected number of employees;
- the number of daily trips to and from the site for employee commuting, delivery of materials or supplies, and shipment of product;
- the source and amounts of water to be used for the facility, including any water efficiency equipment that would be used;
- the types of lighting that would be used;
- the types of odor control methods to be employed;
- the types of hazardous materials that would be used on the site, including fuels, fertilizers, pesticides, volatile solvents, and chemicals;
- environmental protection measures that would be incorporated into future proposed cultivation operations, and whether these measures would be considered mitigation measures or conditions of permit issuance;
- the utilities needed to serve the cultivation facility, including sewer service, and whether such utilities are currently available to serve the site with sufficient capacity for the project; and
- the source (equipment) and amounts of energy expected to be used in operating the facility, including any energy management and efficiency features incorporated into the Proposed Project.

If the City intends to evaluate both the construction of the facility and the operations that would take place in the facility, the project description should clearly describe the details of both of these elements.

Comment 3: Analysis of Resource Impacts from Proposed Project Operations. If the City intends for the EIR to cover the operational activities of an operator or any potential future tenants, it must provide an analysis of impacts specifically resulting from the operations and maintenance activities that would take place at the site. As examples, resource impacts may result from energy or water use, greenhouse gas emissions from operations and vehicle traffic, odor emissions, and noise generation.

CEQA requires that Lead Agencies evaluate the environmental impacts of proposed projects and support factual conclusions with substantial evidence. DCC requests that any analyses of operations and maintenance activities clearly cite the source(s) of the evidence relied upon for each impact discussion. If the City relies upon assumptions or estimates to determine impacts from potential operators' or future tenants' activities based on other similar commercial cannabis projects, those assumptions should be clearly described and analyzed. This information would be particularly useful for resource topics such as air quality, energy, greenhouse gas emissions, and transportation and traffic, where modeling requires baseline assumptions for operational equipment usage, including cannabis ventilation systems, power generators, indoor lighting, and vehicle trips.

Comment 4: Subsequent CEQA Analysis/Tiering and Streamlining. If the City anticipates that site-specific CEQA compliance for individual cannabis projects within the cannabis facility would be completed at a later date, DCC requests that the City of Lancaster indicate how the City intends to complete any subsequent site-specific environmental assessments. This may include subsequent CEQA documents (e.g., IS/NDs, IS/MNDs, and EIRs), addenda to the Proposed Project EIR, and/or determinations that no further documentation would be needed.

DCC encourages local jurisdictions to use CEQA streamlining options when appropriate. For tenant projects that are not fully covered under the Proposed Project EIR and not exempt from CEQA, DCC recommends that the City prepare a CEQA document (an addendum, IS/ND, IS/MND, or EIR) that tiers from the Proposed Project EIR, as appropriate (i.e., incorporating by reference general discussions and concentrating the later environmental assessment solely on the issues specific to the later project). DCC recommends that the City of Lancaster prepare Notices of Determination (NODs) and file them with the State Clearinghouse for all subsequent site-specific CEQA documentation, addenda, and/or other later activities approved using CEQA streamlining approaches.

Comment 5: Analysis of Site-Specific Resource Impacts. Some environmental topics may generally fall outside of DCC's regulatory authority because these topics are regulated by local land use regulations. These could include issues such as aesthetics, land use and planning, geology and soils, mineral resources, noise, odors, regional recreational facilities and services, compliance with building standards, provisions for police and fire protection, and connections to public utilities (e.g., public water, wastewater, and storm drainage systems). Many of these topics involve the evaluation of site-specific conditions, the details of which may not be known by state regulatory agencies. In addition, local conditions affecting resources, such as site-specific groundwater availability, traffic conditions, and wildfire risk, may be best assessed and evaluated by local lead agencies.

DCC requests that the City of Lancaster’s Proposed Project EIR, and/or other subsequent environmental analyses completed for tenant activities, evaluate potential impacts of licensed commercial cannabis cultivation activities of these resource topics at an appropriate site-specific level. Evaluations should include mitigation measures that, when applied to the Proposed Project and potentially later-defined tenant cultivation activities, would ensure that the Proposed Project as a whole would not result in significant adverse impacts on the environment, as determined necessary.

Comment 6: Cumulative Impacts. It is important for the Proposed Project EIR to disclose and evaluate potential cumulative impacts of cannabis business activities. Of particular importance are topics for which the impacts of the Proposed Project may be less than significant, but collectively with other existing and proposed cannabis operations, and/or other industrial complexes where it is allowable and reasonable to predict future cannabis operations may be permitted, would contribute to a significant cumulative impact. These topics include:

- Impacts of groundwater diversions on the health of the underlying aquifer, including impacts on other users and impacts on stream-related resources connected to the aquifer;
- Impacts on terrestrial biological species and habitats, particularly special-status species as defined under CEQA;
- Impacts related to noise; and
- Impacts related to air quality and objectionable odors.

Comment 7: Consideration of DCC Regulations

DCC has published regulations containing environmental protection measures, designed to reduce the severity of environmental impacts for several resource topics. The EIR’s analysis could benefit from a review of the protections for environmental resources provided by DCC’s regulations, and a discussion of how these regulations may affect or reduce the severity of the Proposed Project’s environmental impacts. Current DCC regulations can be found at: <https://cannabis.ca.gov/cannabis-laws/dcc-regulations/>.

Comment 8: DCC Noticing. In order to ensure that the EIR is sufficient for DCC’s needs when it reviews cultivation applications related to the Proposed Project, DCC requests the City of Lancaster include DCC in the Reviewing Agencies Checklist for the Proposed Project, and that a copy of the draft EIR be provided to DCC for comment when complete. This comment applies to all future CEQA documents for commercial cannabis business projects within the City of Lancaster. Further, DCC requests that a copy of the final EIR and a signed Notice of Determination be provided to future tenants, so future cannabis applicants can include them with their application package submitted to DCC.

Conclusion

DCC appreciates the opportunity to provide comments on the NOP for the Proposed Project. If you have any questions about our comments or wish to discuss them, please contact Kevin

Ponce, Senior Environmental Scientist Supervisor, at (916) 247-1659 or via e-mail at Kevin.Ponce@cannabis.ca.gov.

Sincerely,

Lindsay Rains
Licensing Program Manager



November 21, 2022

Ref. DOC 6742524

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

Dear Ms. Campana:

NOP Response to Eastside Overlay

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report for the subject project on October 31, 2022. We offer the following comments:

Light Industrial Overlay Zone

1. Portions of the project area is located outside the sphere of influence of the Districts, as adopted by the Local Agency Formation Commission (LAFCO). Therefore, until the current sphere of influence for the appropriate Sanitation District has been amended by LAFCO to include these portions of the area, the Districts will be unable to annex the area and provide sewerage service.
2. Portions of the project area is outside the jurisdictional boundaries of the Districts and will require annexation into District No. 14 before sewerage service can be provided to the proposed development. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Annexation Program. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708.
3. Due to the project location, the flow originating from the project area would have to be transported to the Districts' trunk sewer by local sewer(s) that are not maintained by the Districts. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or Districts' trunk sewer.
4. The wastewater generated by the proposed project will be treated at the Lancaster Water Reclamation Plant, which has a capacity of 18 million gallons per day (mgd) and currently processes an average recycled flow of 13.9 mgd.
5. The Districts should review future individual developments within the project area to determine whether or not sufficient trunk sewer capacity exists to serve each development and if Districts' facilities will be affected by the development.
6. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Will Serve Program, and then click on the [Table 1, Loadings for Each Class of Land Use](#) link for a copy of the Districts' average wastewater generation factors.

Cannabis Facility

7. The project area is outside the jurisdictional boundaries of the Districts and will require annexation into District No. 14 before sewerage service can be provided to the proposed development. Please refer to item 2 above for annexation information.
8. Individual developments associated with the proposed project may require a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section at (562) 908-4288, extension 2900, to reach a determination on this matter. If this permit is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction. For additional Industrial Wastewater Discharge Permit information, go to <https://www.lacsd.org/services/wastewater-programs-permits/industrial-waste-pretreatment-program/industrial-wastewater-discharge-permits>.
9. The nearest Districts' trunk sewer is the Trunk "C" Trunk Sewer, located in 30th Street East at East Avenue K. The Districts' 24-inch diameter trunk sewer has a capacity of 5.4 mgd and conveyed a peak flow of 0.6 mgd when last measured in 2021. Please refer to item 3 above for wastewater conveyance.
10. The expected average wastewater flow from the project, described in the NOP as a cannabis-related facility up to 200,000 square feet, is 40,000 gallons per day. Please refer to item 6 above for wastewater generation factors.

General Comments

11. The Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, under Services, then Wastewater (Sewage) and select Rates & Fees. In determining the impact to the Sewerage System and applicable connection fees, the Districts will determine the user category (e.g. Condominium, Single Family Home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If an Industrial Wastewater Discharge Permit is required, connection fee charges will be determined by the Industrial Waste Section.
12. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsdsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

cc: D. Curry
A. Howard
P. Palencia
A. Schmidt

From: [Boxcargto](#)
To: [Campana, Cynthia](#)
Subject: Proposed Cannabis Facility
Date: Friday, November 4, 2022 8:29:39 AM

You don't often get email from boxcargto@gmail.com. [Learn why this is important](#)

Good morning, Cynthia,

I was made aware yesterday of a proposal to consider placing a cannabis facility on APN 3170-012-002. I am a resident living 1/2 mile from that location and am vehemently opposed to such a project. Having lived in Lancaster for nearly 20 years I am amazed how easily we have sacrificed the moral values of our area for the sake of money. I was present at the council meeting several years ago and witnessed the strong opposition to legalizing cannabis in Lancaster, only to hear the response from leadership that residents should have been more vocal in the planning process. We are now being vocal in the planning process and respectfully request this project to be denied.

My wife and I have 3 kids. There's not enough money in the world that would justify the sacrifice of their safety. If this facility is approved, the odds are great that violent crime would escalate in our area as a result. I first smelled marijuana when I was in my late 20's. Unfortunately my kids were all too familiar with the smell when they were in elementary school. The proximity of this facility will permeate our neighborhood incessantly, but not only that, it will also permeate the soccer center where we as a city promote a family environment. The ability for thousands of visitors each year—from Lancaster but outside of our valley as well—to enjoy a soccer game would be overshadowed by the odor and advertisement that we as a city value cannabis and the bottom line over our families. There has never been an argument that cannabis promotes family values.

This project is not what we want to become the signature of our city, at the sacrifice of our families' safety and the priorities we represent. Please deny this project.

Thank you for your time.

Date: 11-4-22

Donald Kasper
3850 Eleanor Ct.
Lancaster, CA 93535

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

Re: Response to Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Eastside Overlay

Dear Ms. Campana,

My response to this proposal key points are the following:

1. The Eastside Overlay region is not some unused desert to be disposed of to try to generate Lancaster revenue. It has the two major water sources for the Antelope Valley comprising Little Rock Creek (LRC) and is adjacent to Big Rock Creek (BRC) at 120th. The implementation of a facility to grow pot starts on the west side of Little Rock Creek to tap into that water aquifer that recharges groundwater for Palmdale and Lancaster. This is our main ground water supply source east of I-14. Currently Los Angeles gets water from the Colorado River and Owens Valley, both of which are under threat. Some water for Palmdale and Lancaster comes from the California Aqueduct originating at Lake Oroville, which is also under threat. "Under threat" meaning cutbacks have occurred and may continue as dry conditions continue currently in the Southwestern US. The only other supply of water for Palmdale/Lancaster is groundwater recharged by these two creeks. In wet years, they continue all the way to Edwards Air Force Base (EAFB) playas. Over by Pinion, the water flows into El Mirage Dry Lake. Pot growing takes a lot of water, and smart pot growers want it all, so they are going to sit on the west side of one aquifer and expand from there.
2. Senior water rights exist for original farmers of the Antelope Valley, many dating back to around 1895. However, that is for "fair use" and is unclear it extends in an overdraft aquifer system to growing recreational drugs instead of growing food or for residential use. In addition, the first and best use of water defined in the California constitution is for cities, not farmers or anyone else. Since the Palmdale groundwater pumping south of the Palmdale Airport and to the west of the cannabis site has a huge water table draw down, it is argued that the water table in the proposed area is in overdraft, and that major new uses superior to public city use are inferred in this proposal, nor is this plan an extension of prior fair use for food production.
3. If Palmdale and/or Lancaster needs BRC or LRC water, it can seize that land by eminent domain. It is argued the seizing land based on use for growing onions, carrots, alfalfa, and winter wheat is vastly cheaper than seizing it from cannabis growers, greatly increasing public eminent domain costs. What was the price farmers were paying for their land to grow these food crops? A maximum of \$3000 an acre. I doubt eminent domain of a cannabis facility will cost that little.
4. What is the soil fertility of this region? According to farmers, it suffers from high sodicity. This means that water is repelled by the sodium in the soil. To attempt to grow crops here, they have to apply sulfur, manure, chemicals to attempt to subdue it that otherwise requires plot flooding to try to feed the crops, with substantial runoff. It is not that you just water crops and they grow here. Growing food crops in loam soil with high sodicity is a challenge that requires extra water, then that runoff water is high in sodium and cannot be further used for agriculture.
5. Threat of ground subsidence. LRC has historically been established as a subsidence hazard, particularly closer to EAFB starting east of the Ranch Tierra del Sol (RTDS) neighborhood. If, as I have proposed to the US Geological Survey (USGS) Chief Scientist several years ago, that LRC is in fact a geologic graben structure

(down-dropped block faced by two faults) then this pumping action can concentrate subsidence for any housing adjacent to pumping wells of that facility. This is just the start of the operation, and it clearly will be expanded in the future, and closer to areas such as the RTDS neighborhood where I live. At the time several years ago, all that groundwater data I obtained from the manager of the Palmdale Water District personally, and shared with the USGS.

6. Crime. South of my house is a 12-acre, apparently Armenian mafia grow complex, in former turkey farm buildings. Let us see what their luck has been. Well, they apparently had a lot of cash and someone showed up last year with high powered assault rifles to get some. The police were called. The thieves did not take kindly to their arrival and began a gun fight with police. Two assault armored vehicles were called up from Santa Clarita. A house-to-house yard search took place as the shooters fled, that include 4 armed officers jumping my fence to look around my property. No Federal bank takes cannabis money, it is all cash, it is a lot of cash, and some others think they are owed some of it. Gun fights will probably occur from time-to-time over payments and turf. How do we know the Armenian mafia is already here? They have a penchant for importing Armenian dampers, huge wolf hound sized dogs to protect their properties. One guards the lot south of my house, and two ended up in the 70th street area after state drug busts last year dispersed a lot of dogs. The owner of one farm adopted one of them to protect her horse ranch and cares for another sick one brought in by a neighbor. They have implant tags Id's not recognized by any US tag implant company, and come from Eastern Europe. The Armenians literally import Armenian dampers at great expense to watch their properties. We also had an Armenian growing cannabis in his house NE of Victor and Paula Ln for some time, perhaps recently moved on according to his neighbor, so they also take over local houses.
7. Housing values. The goal is not to have a couple hundred acres of cannabis farm away from local houses and the rest for facilities that closer to RTDD. The goal is to get established with a couple hundred acres, get access to LRC water, start sucking it down, and move south and east of RTDS. As this occurs, this won't ever have a positive impact on property values, it can only have a negative impact, unless buyers are in Armenian gangs. They will link up to the operation south of my property at 40th East and K for operations processing, as that already has large warehouse buildings left over from former turkey farm and alfalfa activities in the early 20th century. Processing can also be fed by local home grow operations already established in our community, and will probably expand. This is an integrated, vast expansive plan, implemented one piece at a time, first with a benign EIR, then later administrative actions with no further community input required. We need to see the real plan when they have taken over it all. The property south of my house has two huge 50,000 gallon water tanks, so they are good to go to start aquifer draw down, and in conjunction with an alfalfa field well across the street will impact ground stability, city pump water supply, and property values together.
8. Electrical grid stability. We had our first underground transformer vault blow up last summer one half block from the 40th/K grow operation, and I presume the mysterious reason for this old equipment exploding is the system was not made for the power demand of grow operations infiltrating our area. For now, they have a huge power generator that arrived, but these cost more to operate, and I presume they intend to draw on our grid power in the future as Edison has to arrive regularly for upgrades. Any covered facility takes sun lamps to grow the plants. To get good yields takes a lot of lamps. These draw on the electrical grid, which is already overtaxed in California. They aren't going to have lamps at the level of a local house, they are going to grow thousands and thousands of acres of cannabis, and suck down an enormous amount of power.
9. Rare, threatened, endangered species. Based on prior study I was involved in for the Rosamond effluent spreading near EAFB, the main species of concern for the area may involve kit fox, loggerhead shrike (a bird), the alkali mariposa lily, and the Mojave spineflower. There are also fairy shrimp in some clay pans and the BRC drainage and many others I collected, all common species found so far, but remember, until I sampled them in this region, no one had apparently looked for them. Some species of fairy shrimp are endangered, and occur in just a few tiny pans in others Southern California locations. A single clay pan can hold a single species found nowhere else, so they have to be checked. For example, clay pans and road margins around the Baptist College have fairy shrimp that came out in the 2004 El Nino storms.

10. Mitigation. In the past, onions exported to Russia were tested using Palmdale processed sewage effluent south of the Palmdale Airport. The Los Angeles Sanitation Districts implemented this type of effluent use for alfalfa and Sudan grass from the sewage plant South of Lancaster along I-14 near Rosamond. The best use of that waste water in a system of pipes already designed for it occur along the northern EAFB perimeter, and any cannabis facility should be put there and use that waste water, which helps keep it off EAFB playas, used for emergency plane landings. There is also a pump system to move some of that water to grow alfalfa west of I-14, and more than enough adjacent parcels to grow cannabis there as well. Yeah, I know, the mafia wants the best water, we can use the recycled water, but the Antelope Valley has two aquifer layers, where the deeper one is apparently saltier, and I see no proof the waste water would have higher salt content than the lower aquifer they will tap into. Lancaster implemented "package plants", pre-built tertiary treatment plants of certain capacity for these uses for maximum cleanup. The water can even be run through reverse osmosis cleanup, creating truly pure water. Lastly, there are large discharge sewage treatment ponds NW of Lake Los Angeles (120th and L) that would appear available for water reclamation.

Conclusion. The region west of I-14 is wetter, has pinion pine forest that shows this, has broad discharge from the San Andreas created Elizabeth Lake over some small hills, and has higher soil fertility. The area is also cooler. This is a preferable region to load up with cannabis grow farms. It is better to have this area as agricultural than more housing as the USGS posts the area hills against the San Andreas escarpment as a 90% destruction zone in a major earthquake. Unincorporated county areas can be seized as Lancaster city jurisdiction and adjudicated as grow areas. Otherwise, 4 major wastewater areas are available, away from urban populations, and already good-to-go for cannabis grow water sourcing. We need to manage and bank our water, and not sell it on the cheap to the mafia.

Regards,



Donald Kasper

From: [Monica Bass](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay project
Date: Tuesday, November 15, 2022 2:51:12 PM

You don't often get email from steppinginthelight@gmail.com. [Learn why this is important](#)

Hi Cynthia,

I am writing to voice my opposition to any cannabis-related industry being included in the Eastside Overlay project. I live and work near the area of the proposed Eastside Overlay, and I am adamantly opposed to it becoming a place at which cannabis is grown, manufactured, or retailed, as the information pdf from the City of Lancaster indicates could happen.

I request that the permit for this overlay zone not include—and in fact, specifically exclude—the possibility of this zone for any cannabis-related activities. The growth and use of marijuana is not good for our community and especially our youth. It's also a huge disappointment to people who live nearby—both as an air quality issue and crime growth risk.

Sincerely,
Monica Bass

From: [Anna Gregory](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Monday, November 7, 2022 3:55:34 PM

You don't often get email from anna.gregory1865@gmail.com. [Learn why this is important](#)

Dear Ms. Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Anna Gregory

From: [Bill Bach](#)
To: [Campana, Cynthia](#)
Subject: opposed to cannabis industry
Date: Monday, November 7, 2022 5:53:35 PM

You don't often get email from wrba1026@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Bill and Barb Bach

From: [Bill Bach](#)
To: [Campana, Cynthia](#)
Subject: opposed to cannabis industry
Date: Monday, November 7, 2022 5:53:35 PM

You don't often get email from wrba1026@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Bill and Barb Bach

From: [Cecelia Babuschak](#)
To: [Campana, Cynthia](#)
Subject: Opposition to Eastside Overlay - Cannabis Facility
Date: Monday, November 7, 2022 4:02:22 PM

[You don't often get email from cecebab94@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Miss Campana,

I am emailing to confirm my opposition to any Cannabis related industry being included in the Eastside Overlay Project. I would like to request more information and hearings yo understand the purpose and planning of the overlay.

Sincerely,
Cecelia Lee
Lancaster resident

From: [Helen Eyre](#)
To: [Campana, Cynthia](#); [Parris, R Rex](#); [Crist, Marvin](#); [Malhi, Raj](#); [Dorris, Darrell](#)
Subject: Eastside Overlay project
Date: Monday, November 7, 2022 4:30:44 PM

You don't often get email from heleneyre03@gmail.com. [Learn why this is important](#)

Mayor Rex Paris
Vice Mayor Marvin Crist
Councilmember Ken Mann
Councilmember Raj Malhi
Councilmember Darrell Dorris
Senior Planner Cynthia Campana

Dear Mayor, Council Members, and City Planner,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Continued research shows these projects adversely affect the environment from high water usage and chemical waste/bi-products. The proposal will also grossly impact housing located just a few short miles away, including new housing developments on Ave J, by devaluing property and making it less desirable for families to live nearby. Additionally, placing a cannabis growing operation mere miles from two large schools and thriving Soccer Park is just negligent as a community, as this industry has been linked statistically to increased crime and mental/physical health concerns.

I hope you will reconsider this project and wish to receive further information/hearings on why the city deems the rezoning included in the overlay necessary.

Sincerely,
Helen

From: [James Smithey](#)
To: [Campana, Cynthia](#)
Cc: [Parris, R Rex](#); [Dorris, Darrell](#); [Crist, Marvin](#); [Mann, Ken](#); [Malhi, Raj](#)
Subject: Eastside Overlay
Date: Monday, November 7, 2022 3:29:36 PM

You don't often get email from thesmitheys@me.com. [Learn why this is important](#)

Dear Mayor, Vice Mayor, and Council Member,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
James Smithey
(Concerned Lancaster Citizen)

From: [John Williams](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Monday, November 7, 2022 3:36:49 PM

You don't often get email from johnwilliams6raleigh@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana, Senior Planner for the City of Lancaster,

As a citizen of the east side of Lancaster, I would like to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. In addition, I am requesting more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

John Williams

From: [Kari](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Monday, November 7, 2022 3:47:26 PM

You don't often get email from kari1k9@yahoo.com. [Learn why this is important](#)

Hello Ms. Campana,

Firstly, thank you for the effort you put into our city.

I understand that there is a zoning proposal for a large section of land just past 40th E to change from residential to industrial. I'm not educated enough on zoning to grasp the implications of such a change, but if there is even a 1% chance that this could turn into a cannabis operation, I beg you to shut down the proposal - money talks, and we know cannabis brings in money.

I used to live at 12345 East Ave J (yes, that is a real address:)), and have recently moved closer to town- now benefitting from being farther away from the illegal cannabis, encampments, stray dogs, and crime in the far eastern part of Lancaster. I now live right off of 40th E and Ave L, and I am afraid that if cannabis (legal or illegal) continues to come west, we will be inviting encampments and even more crime into the interior of Lancaster. It all seems to be connected.

I don't want to be fearful in my own house. Bringing cannabis down the street from me, I'm afraid, will bring crime closer to my front door.

Thank you for your consideration,

Kari Schmidt

From: [Lisa Harris](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Monday, November 7, 2022 4:14:17 PM

You don't often get email from lisaharris49@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

I am in opposition to any cannabis related industry being included in the Eastside Overlay project. Please consider keeping Lancaster a safe place for families. I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Lisa Harris
East Lancaster Resident

Sent from my iPhone

From: [Dr. Mark Rasmussen](#)
To: [Campana, Cynthia](#)
Subject: Re proposed cannabis area
Date: Monday, November 7, 2022 9:25:29 PM

[You don't often get email from mark.rasmussen@lancafterbaptist.org. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Cynthia

I am a long time home owner on 40th st East. Like many others in our neighborhood I am adamantly opposed to this zoning change.

Sincerely

Dr Mark Rasmussen
43931 40th st East
LAncaster, CA. 93535

Sent from my iPhone

From: [Melissa Calderon](#)
To: [Campana, Cynthia](#)
Subject: FW:
Date: Monday, November 7, 2022 5:31:21 PM

You don't often get email from melissa.calderon@lancasterbaptist.org. [Learn why this is important](#)

To whom it may concern,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Melissa Calderon

Melissa Calderon | Lead Secondary Instructor | Lancaster Baptist School
[|melissa.calderon@lancasterbaptist.org](mailto:melissa.calderon@lancasterbaptist.org)

From: [suza_rasmussen](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project - opposition
Date: Monday, November 7, 2022 6:19:39 PM

You don't often get email from rasmussen1@msn.com. [Learn why this is important](#)

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project.

Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Suza Rasmussen
43931 40th Street East
Lancaster, CA 93535

From: [Willy Deleon](#)
To: [Campana, Cynthia](#)
Subject: EASTSIDE OVERLAY
Date: Monday, November 7, 2022 9:49:28 PM

You don't often get email from wilfredodeleon4@icloud.com. [Learn why this is important](#)

Dear Ms. Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Wilfredo De Leon

Sent from my iPhone

From: [Allison Crabb](#)
To: [Campana, Cynthia](#)
Subject: The Eastside Overlay Project
Date: Tuesday, November 8, 2022 2:54:16 PM

You don't often get email from acrabb98@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Allison Crabb

From: [Angelica Loo](#)
To: [Campana, Cynthia](#)
Subject: Respectfully asking to stop the cannabis faculty in 40th at east
Date: Tuesday, November 8, 2022 4:09:22 PM

You don't often get email from looangelica18@gmail.com. [Learn why this is important](#)

Ms. Cynthia Campana

Im writing you in reference to my community on Ryckebosh in the east side of lancaster.

It's come to my attention that a cannabis company is planning to build their production.

Let me tell you as a home owner I love my community not only because 90% of us are members of the Lancaster Baptist Church but because I feel safe and secured. This community is one of the safest communities on the East side of Lancaster and the reason behind it is because we are all hard working families who raise young children to become great young adults and active in our communities as adults.

I am a hard working nurse and my husband is a business owner, if this facility goes up not only will you be loosing great Neighbors, you will be loosing great community support as we will sell and move out.

This facility will impact the great community you have on the east side and the support that we provide to city of Lancaster.

Please care enough for our wonderful neighborhood to stop this chaos, we don't want the proposed Cannabis facility to be placed anywhere near our homes and families.

With respect.

Angelica Toledo

From: [Ben Hobbs](#)
To: [Campana, Cynthia](#)
Subject: RE: Eastside Overlay
Date: Tuesday, November 8, 2022 11:03:26 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[CCampana Letter 110822.pdf](#)

You don't often get email from ben.hobbs@lancasterbaptist.org. [Learn why this is important](#)

Good morning Cynthia,

Thank you again for your help with answering my questions on the Eastside Overlay. Attached is a letter that will go out today to you with my comments regarding the proposed Overlay.

I understand that there has been movement already with the Overlay that partially addresses our concerns. The attached letter simply documents my main concerns and requests both as a resident and as a member of the ministry leadership team here at LBC.

Please let me know if you have any questions or need any additional information.

Kind regards,

Ben Hobbs

Ben Hobbs | Director of Financial Administration | Lancaster Baptist Church | 661.946.4663 ext. 2125

From: Campana, Cynthia <ccampana@cityoflancasterca.gov>
Sent: Wednesday, November 2, 2022 9:46 AM
To: Ben Hobbs <Ben.Hobbs@lancasterbaptist.org>
Subject: Eastside Overlay

Hello,

It was a pleasure speaking to you today. I wanted to email you and provide you with my contact information. Let me know if you have any further questions.

Sincerely,

Cynthia Campana
Senior Planner - DS – Community Development
City of Lancaster
44933 Fern Ave. | Lancaster, CA 93534
T [661.723.6262](tel:661.723.6262)
ccampana@cityoflancasterca.gov | cityoflancasterca.gov





Lancaster Baptist Church

November 8, 2022

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

Dear Cynthia,

It was good to speak with you last week regarding the Eastside Overlay, Notice of Preparation. I am writing today both as a 23-year resident of the Eastside of Lancaster and as a representative of Lancaster Baptist Church and West Coast Baptist College.

I would like to first express my concern that Lancaster Baptist Church was not informed nor involved in the planning discussions regarding the Eastside Overlay. As a significant stakeholder on the Eastside of Lancaster for more than 28 years, we have historically been involved in significant discussions and decisions impacting the areas of our community where most of our members reside. In addition to not being involved early in this process, we were never formally notified my mail with the Notice of Preparation despite our church campus being just across Avenue J from the northern edge of the Overlay zone.

As both an Eastside resident and a leadership team member of Lancaster Baptist Church and West Coast Baptist College, I strongly oppose two specific components of the Notice of Preparation, Eastside Overlay:

- 1) Cannabis Facility - I oppose both the legal and illegal farming, harvesting, and processing of cannabis on the Eastside of Lancaster. The placement of the Cannabis Facility on 40th Street East in the Overlay zone will endanger the health, safety, and quality of life for thousands of Eastside residents, some of whom live literally across the street from this proposed facility. Within half a mile of the proposed facility are two large subdivisions with hundreds of homes. Within the impact area of the proposed facility are at least 4 schools, 1 college, and 1 pre-school facility. I oppose the placement of a Cannabis Facility anywhere within the 5,841 acre Overlay zone. Respectfully, I request that the Cannabis Facility be removed from the Overlay zone.

lancasterbaptist.org
661.946.4663
661.946.2620 fax
4020 E. Lancaster Blvd
Lancaster, CA 93535
Paul Chappell, Pastor



- 2) As an opponent of both legal and illegal cannabis activity on the Eastside of Lancaster, I request that the proposed uses of the Light Industrial Overlay Zone be modified to exclude "commercial cannabis activity".

Thank you for hearing my concerns and the concerns of many Eastside residents regarding the Eastside Overlay.

Should you have any questions or wish to discuss this further, please do not hesitate to contact me. You may reach me at 661-946-4663 or by email at ben.hobbs@lancasterbaptist.org.

Sincerely,

A handwritten signature in blue ink that appears to read "Ben Hobbs".

Ben Hobbs
Director of Financial Administration
Chief Financial Officer/West Coast Baptist College

cc: Jason Caudle/City of Lancaster

From: [Brandon Ewing](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Tuesday, November 8, 2022 2:39:49 PM

You don't often get email from brandontewing@gmail.com. [Learn why this is important](#)

Dear Mrs. Campana,

Thank you for reading my email. I am very concerned about the proposed Eastside Overlay that changes the zoning of a large section of land on the far east side of the city.

I oppose this change and in particular oppose any cannabis related industry being included in the Eastside Overlay project.

Sincerely,

Brandon Ewing

From: [Brenda Conner](#)
To: [Campana, Cynthia](#)
Subject: East side Overlay
Date: Tuesday, November 8, 2022 4:06:04 PM

You don't often get email from batconner@gmail.com. [Learn why this is important](#)

Dear Cynthia

This email is to confirm my opposition to ANY cannabis related industry being included in the Eastside Overlay project. I live right across from the proposed area. I have 7 children and my parents who live with me. My mother, who has myriad of health issues (mostly airway related) and certain things exacerbate it (smells etc).

Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Brenda Conner (a concerned resident)

From: [Ceci Villa](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Tuesday, November 8, 2022 9:48:42 AM

You don't often get email from ceciliavillarreal18@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

I am a current resident of the City of Lancaster and I wanted to reach out to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Cecilia Villarreal

From: [C.S. Thompson](#)
To: [Campana, Cynthia](#)
Subject: City of Lancaster Eastside Overlay plan for CANNABIS Facility
Date: Tuesday, November 8, 2022 10:40:23 PM

You don't often get email from morguemouse@yahoo.com. [Learn why this is important](#)

Dear Campana:

Let it be known that I vehemently object to this proposed project!!!! I am a homeowner here who has lived at 43616 Devyn Lane since 2001. I believe such a project would attract serious criminal activity, create a negative impact on nearby property values, and likely have a detrimental impact on the overall environment. This is a highly desirable neighborhood featuring custom homes on 1+ acre lots. Over the years, we have had to accept the 2 schools that were built at the boundaries of our tract. As a result, we see a lot of blowing trash and traffic on our streets. Homeowners here have worked hard to afford our properties here and we take great pride in maintaining them and keeping crime and blight to a minimum.

Sadly, the City of Lancaster has allowed crime, urban blight, dumping, and homelessness to expand and increase all around the city's boundaries. It is shameful to see these scourges upon the community growing worse by the day. The solar arrays have also been a terrible mark on the once beautiful desert that the Antelope Valley was so proud of. We have a higher incidence of blowing dust in the air coming from those arrays.

May I humbly request the City to explore other areas or ideas to plan or develop business ventures? *Surely the city council members would strongly object to a cannabis enterprise being proposed for THEIR neighborhoods.* I am speaking for myself, but likely echoing the sentiments of my neighbors when I make this objection to such a proposal.

A cannabis operation would be of very little positive value here, as the negative impacts would more than negate any possible tax revenue to come from it. At the least, it would be a huge turn off to potential homeowners, who are tax payers. The good people here will eventually pull up stakes and migrate AWAY from here. Such a large number have already left the state for so many reasons.

Please record my comment as being a STRONG NO on this project.

Thank you,

Colleen S. Thompson -- resident & property owner
43616 Devyn Ln.
Lancaster, CA 93535
(661) 902-1515

C.S. Thompson

Subject: Eastside Overlay project

Date: Tuesday, November 8, 2022 at 5:42:21 PM Pacific Standard Time

From: Daniel Avery

To: Parris, R Rex, Gonzalez, Tamara, Crist, Marvin, Mann, Ken, Malhi, Raj, Dorris, Darrell

Some people who received this message don't often get email from dantavery@gmail.com. [Learn why this is important](#)

Dear City of Lancaster,

I wanted to contact you in regards to Eastside Overlay project.

I want to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project.

Furthermore, I request more information and hearings to understand the purpose and planning of the overlay. I live on Ave K on the Eastside and this would bring additional negative impact on our community.

Sincerely,
Daniel Avery

From: [Daniel Blehm](#)
Subject: Eastside Overlay Opposition
Date: Tuesday, November 8, 2022 3:36:57 PM

You don't often get email from daniel.blehm@gmail.com. [Learn why this is important](#)

To Whom It May Concern,

I am writing to confirm my opposition as a citizen of Lancaster to have my concerns and opposition recorded related to any cannabis related industries being included in the Eastside Overlay project currently and in the foreseeable future. This would be bad for Lancaster and for our children. This proposed overlay makes no logical sense with neighborhoods, schools and community soccer fields so close by servicing many families of our valley.

I request more information and to be included with any communication or community hearings so as to gain a greater understanding and to voice my opposition should the purpose or planning of the overlay proceed.

Do right for the future of Lancaster and not just for the immediate economic results.

Concerned Citizen,

Daniel Blehm

From: [Edward Johnson](#)
To: [Campana, Cynthia](#)
Subject: Opposition to potential cannabis related industry on East Side of Lancaster
Date: Tuesday, November 8, 2022 11:57:35 AM

You don't often get email from ejnbekahj@gmail.com. [Learn why this is important](#)

Hello! My name is Edward (EJ) Johnson, and my family and I have lived in East Lancaster for over 25 years.

I am writing to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project.

Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Thank you!

Have a great day--EJ Johnson

From: [Felix Dizon](#)
To: [Campana, Cynthia](#)
Cc: [Dorris, Darrell](#); [Parris, R Rex](#)
Subject: Opposition to Cannabis Industry
Date: Tuesday, November 8, 2022 9:52:36 AM

[You don't often get email from fldizon@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

My family and I respectfully oppose the Cannabis Industry being planned as part of the Eastside Overlay Project. It may generate revenues for the city but we firmly believe it will result to negative and long term effects.

Thank you.

Sincerely,

Felix Dizon

From: [Israel López](#)
To: [Campana, Cynthia](#)
Subject: East Side Overlay
Date: Tuesday, November 8, 2022 9:02:10 AM

You don't often get email from israellopse@gmail.com. [Learn why this is important](#)

Dear City of Lancaster, Senior Planner

As a current resident of East Side Lancaster, California, this email is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Israel Lopez

From: [Lois Wruck](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Opposition
Date: Tuesday, November 8, 2022 8:45:52 AM

You don't often get email from loiswruck@gmail.com. [Learn why this is important](#)

Dear Mrs. Cynthia Campana

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Lois Wruck

From: [Melanie Anderson](#)
To: [Campana, Cynthia](#); [Crist, Marvin](#)
Subject: Eastside Overlay
Date: Tuesday, November 8, 2022 9:27:30 AM

You don't often get email from missmimi1028@gmail.com. [Learn why this is important](#)

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Melanie Anderson

From: natalie.lofgren@outlook.com
To: [Campana, Cynthia](#)
Subject: Eastside Overlay project
Date: Tuesday, November 8, 2022 6:31:20 AM

You don't often get email from natalie.lofgren@outlook.com. [Learn why this is important](#)

Dear Senior Planner Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Natalie Lofgren

From: [Nathan Birt](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Tuesday, November 8, 2022 2:52:34 PM

You don't often get email from nbirt91@gmail.com. [Learn why this is important](#)

Ms. Campana,

I am thankful for your leadership in our city, but I am also disappointed in the proposal to grow cannabis on the east side of Lancaster. When this vote took place a few years ago, we were assured that the growth of cannabis would be far outside of the city. Yet, this parcel of land is only a few miles from schools and residential homes. I am completely opposed to this measure, and I respectfully ask that you please vote no.

Nathan Birt
Lancaster, CA 93535

From: [Sarah Anderson](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Tuesday, November 8, 2022 5:47:02 PM

You don't often get email from spandersonteacher@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Sarah Anderson
East Lancaster Resident

From: [Sarah B](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Tuesday, November 8, 2022 9:20:52 AM

[You don't often get email from sarahlblehm@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Cynthia,

I want to give you this email to confirm my OPPOSITION to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the planning and purpose of the overlay.

Sincerely,

Sarah Blehm

From: [Stephen Voshall](#)
To: [Campana, Cynthia](#)
Subject: Response to Eastside Overlay Project
Date: Tuesday, November 8, 2022 4:17:27 PM

You don't often get email from swvosh@gmail.com. [Learn why this is important](#)

Dear Mrs. Campana,

Just wanted to make known my opposition to the cannabis industry part of the Eastside Overlay project. More information and hearings should be made available so we can better understand the Eastside Overlay's purpose and implementation.

Sincerely,

Stephen Voshall

From: [Victoria Reyes](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Tuesday, November 8, 2022 10:28:25 AM

You don't often get email from syd_vicki_reyes@yahoo.com. [Learn why this is important](#)

Dear Ms. Campana,

This is to confirm our opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, we request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Sydney and Vicki Reyes
Lancaster Residents

From: [Tyler Johnson](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project Opposition
Date: Tuesday, November 8, 2022 5:56:28 PM

You don't often get email from tylerjohnson10@yahoo.com. [Learn why this is important](#)

Dear Mrs. Campana,

I am writing to you today as I have read of the Eastside Overlay project in East Lancaster. I am a Lancaster resident in the Eastside, and I am simply writing to voice my opposition to the cannabis facility inclusion in this project.

I would like to receive additional specific information detail the intended use of the overlay.

Sincerely,

Tyler Johnson

From: [William Lofgren](#)
To: [Campana, Cynthia](#)
Subject: My Opposition to Eastside Overlay
Date: Tuesday, November 8, 2022 4:41:39 PM

You don't often get email from willlofgren@hotmail.com. [Learn why this is important](#)

Dear Cynthia Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

I have never heard someone say, "You know what would make me a better spouse or parent? You know how I can be a more upstanding citizen in the city in which I live? If I had easier access to drugs and smoked more dope." I'm sure a city leader has never said, "If we can allow the generating, sale, and distribution of recreational drugs; our lives of those in our community would be better off and much safer." Yet the actions of our city leaders to allow such things speaks such things.

I will also say that for the City of Lancaster to even consider the generating, sale, and distribution of recreational drugs such as cannabis is a very unwise decision. When I was growing up, it was generally accepted that we should "say no to drugs." Today, as a parent, I sadly no longer hear such things, but the promotion of drug use. We live in a backward culture where we have city leaders implicit in the distribution of recreational drugs.

Sincerely,

Will Lofgren

Subject: My Opposition to Eastside Overlay

Date: Tuesday, November 8, 2022 at 4:43:37 PM Pacific Standard Time

From: William Lofgren

To: Mann, Ken

CC: Gonzalez, Tamara

Some people who received this message don't often get email from willlofgren@hotmail.com. [Learn why this is important](#)

Dear Ken Mann,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

I have never heard someone say, "You know what would make me a better spouse or parent? You know how I can be a more upstanding citizen in the city in which I live? If I had easier access to drugs and smoked more dope." I'm sure a city leader has never said, "If we can allow the generating, sale, and distribution of recreational drugs; our lives of those in our community would be better off and much safer." Yet the actions of our city leaders to allow such things speaks such things.

I will also say that for the City of Lancaster to even consider the generating, sale, and distribution of recreational drugs such as cannabis is a very unwise decision. When I was growing up, it was generally accepted that we should "say no to drugs." Today, as a parent, I sadly no longer hear such things, but the promotion of drug use. We live in a backward culture where we have city leaders implicit in the distribution of recreational drugs.

Sincerely,

Will Lofgren

From: [aimster1293](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Wednesday, November 9, 2022 12:38:54 PM

You don't often get email from aimster1293@gmail.com. [Learn why this is important](#)

Dear Ms. Campana,

I wanted to voice my concern and opposition to the Eastside Overlay as it pertains to being used for future cannabis industry.

Please fight to keep our valley clean and safe from the detrimental effects of this drug industry.

Sincerely,
Amy Cox

From: [Bonnie](#)
To: [Campana, Cynthia](#)
Subject: Eastside Cannabis Opposition
Date: Wednesday, November 9, 2022 9:24:08 AM

You don't often get email from bonnie.ferrso@gmail.com. [Learn why this is important](#)

Cindy,

Please help fight the cannabis related industry in our valley. I am opposed to the Eastside overly project.

Bonnie Ferrso
Eastside resident

November 9, 2022

Cynthia Campana, Senior Planner
City of Lancaster
44933 Fern Ave
Lancaster, CA 93534

City of Lancaster,

As long-time east Lancaster residents, we wish to express our opposition to any cannabis related industry being included in the Eastside Overlay project for these reasons:

1. We are opposed to any cannabis activity in our communities. We don't need people in the community attempting to function in an altered mental state.
2. We own acreage in unincorporated LA County in the Roosevelt area of east Lancaster. Our land is zoned A-2-5. We moved there purposely to live in a rural, residential area, similar to the proposed overlay zone. We have been greatly impacted by the proliferation of illegal cannabis growing operations in our area. The stink is pervasive and unhealthy. We strongly believe that anyone who has to live, work, or even drive by the proposed cannabis operation in the Eastside Overlay will be adversely effected by the odors.
3. The flyer distributed to local residents describe the overlay zone as "underutilized." If cannabis is grown in the zone, the area will continue to be underutilized because people will steer clear of the area. Similarly, the property values in the area surrounding the cannabis operation will fall and people will move out.
4. We have been active members of Lancaster Baptist Church for over 30 years. The church is an oasis of hope and strength on the east side of Lancaster. Odors from the proposed cannabis operation will definitely reach the campus at times, effecting the staff, students, and members on campus every day. This is unacceptable.

Sincerely,

Dan and Lisa Stoner
48321 70th Street East
Lancaster, CA 93535

From: [Dana House](#)
To: [Campana, Cynthia](#)
Subject: Opposition to Eastside Overlay
Date: Wednesday, November 9, 2022 4:32:44 PM

[You don't often get email from danahouse2000@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Cynthia Campana,

As a resident of 40th St E, I wanted to express my opposition to the proposal of the Eastside Overlay and to any cannabis related industry being include in the project. I also would like to request for more information and hearings, to understand the purpose and planning of the overlay, thank you.

Sincerely,
Dana House

Sent from my iPhone

From: [ERIC LEE](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Wednesday, November 9, 2022 10:31:27 PM

You don't often get email from ericallenlee@yahoo.com. [Learn why this is important](#)

Dear Cynthia,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Eric Lee

From: [Hwangro Lee](#)
To: [Campana, Cynthia](#)
Subject: My Opposition to Any Cannabis Related Industry
Date: Wednesday, November 9, 2022 8:40:45 AM

You don't often get email from hwangrolee@yahoo.com. [Learn why this is important](#)

Dear Cynthia Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Hwangro Lee

hwangrolee@yahoo.com
661-678-5581(cell)
43660 32nd St., E
Lancaster, CA 93535

Dear Cynthia Campana,

This is to confirm my opposition
to any cannabis related industry
being included in the Eastside Overlay Project.
Furthermore, I request more information and
hearings to understand the delay.

-Jacob

Lancaster CA 93535

SANTA CLARITA CA 91311/08/2022

9 NOV 2022 PM 1 L

NEOPOST
US POSTAGE \$



City of Lancaster
Attention: Cynthia Campana
44933 Fern Ave
Lancaster CA 93534

93534-240000



From: pshoge@adelphia.net
To: [Campana, Cynthia](#)
Subject: Objection to Cannabis Facility on (or anywhere near) APN 3170-012-002
Date: Wednesday, November 9, 2022 7:51:08 PM

You don't often get email from pshoge@adelphia.net. [Learn why this is important](#)

Dear Ms. Campana:

My wife and I want to express our stern opposition to the City of Lancaster approving any plans related to establishing a cannabis facility of any kind within 20 miles of our neighborhood, Rancho Tierra Del Sol, located between 35th St E and 40 St E and Ave J-8 and Ave K. Do you want to purposely turn the East Side Lancaster into Rosamond or California City?! The open promotion and use of this drug is directly responsible for the utter destruction of countless lives and families. Furthermore, rampant drug use, to include marijuana, accelerates the ongoing decline of our civil society. The detrimental effects on a community by even just a few drug users is obvious and cannot be ignored. This facility will do nothing positive to improve our quality of life here in Lancaster and our neighborhood. If this facility is approved we will move away from the neighborhood we've lived in for over 23 years and to a State, city and community that cares about their hard working, God fearing, tax paying citizens.

Thank you for your consideration.

James and Pamela Hoge
43862 35th Street East
Lancaster, CA 93535

From: [Jennifer Davis](#)
To: [Campana, Cynthia](#)
Subject: Cannabis Overlay
Date: Wednesday, November 9, 2022 2:31:37 PM

You don't often get email from missjenniedavis@gmail.com. [Learn why this is important](#)

Dear Cynthia Compana,

Thank you for your service and all that you do.

I wanted yo let you know that I am against any cannabis related industry being included in the Eastside Overlay project. I live and work in this area and it is not the environment that I want for family or work conditions.

Sincerely,

Jennifer Thomas

Sent from my iPhone

From: [jonathan.uribe](#)
To: [Campana, Cynthia](#)
Subject: Against Cannabis Facility designate location
Date: Wednesday, November 9, 2022 11:24:46 AM

You don't often get email from uribe0214@gmail.com. [Learn why this is important](#)

Jonathan Luis Uribe
43651 Devyn Lane
Lancaster CA 93535
818-524-0460

To whom it may concern,

I have a big concern about the location of the cannabis facility and how the noise level will be kept down during its cultivation, manufacturing, and distribution activity, given its proximity to the Tierra Del Sol housing community, schools, and the potential crime that can bring to the community due to its retail activities and its potential to depreciate future housing development and market value. It is in the best interest of my community to not approve their intended location or, worse case, relocate their facility further east on 200th street rather than close to the city center.

Thank you,
Jonathan Uribe, Adult-Gerontology Acute Care Nurse Practitioner

Subject: Opposing the Cannabis Industry's Inclusion in the Eastside Overlay Project

Date: Wednesday, November 9, 2022 at 2:27:47 PM Pacific Standard Time

From: Natalie Chadwick

To: Parris, R Rex, Gonzalez, Tamara

Some people who received this message don't often get email from natalie.r.chadwick@gmail.com. [Learn why this is important](#)

Hello Mayor Paris,

I wanted to let you know that I oppose the cannabis related industry being included in the Eastside Overlay project. I work in this area, and strongly oppose this addition to our community. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Thank you so much,

Natalie Chadwick

From: [Natalie Chadwick](#)
To: [Campana, Cynthia](#)
Subject: Opposing the Cannabis Industry's Inclusion in the Eastside Overlay Project
Date: Wednesday, November 9, 2022 2:26:13 PM

You don't often get email from natalie.r.chadwick@gmail.com. [Learn why this is important](#)

Hello,

I wanted to let you know that I oppose the cannabis related industry being included in the Eastside Overlay project. I work in this area, and strongly oppose this addition to our community. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Thank you so much,

Natalie Chadwick

Dear Cynthia Campana, Senior Planner 11/8/2022

This letter is to inform you that I am firmly against any Cannabis related industry being included in the Eastside Overlay project. I would like to request more information and hearings to understand the purpose and the planning of this overlay. Thank you.

Sincerely,
Ricardo R. Sarrig

Mr. Ricardo R. Sarrig
2130 ELMSA SANTA CLARITA CA 913
Rosamond, CA 91372

USPS
11/08/2022
US POSTAGE \$000.57⁰

FIRST-CLASS MAIL
ZIP 93535
041M11467992



City of Lancaster
Attention: Cynthia Campana,
Senior Planner
44933 Fern Avenue
Lancaster, California 93534



From: [Sera Choi](#)
To: [Campana, Cynthia](#)
Date: Wednesday, November 9, 2022 11:42:07 AM

You don't often get email from sera.choi33@gmail.com. [Learn why this is important](#)

Dear, Ms. Campana,

This is to confirm my opposition to any cannabis related industry being included in the Easide Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Thank you,
Sera Choi

From: [Virginia Shields](#)
To: [Campana, Cynthia](#)
Subject: Rancho Tierra Del Sol Cannabis protest
Date: Wednesday, November 9, 2022 6:03:56 PM

[You don't often get email from highmansions@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms Campana,

We are writing you to protest the building of a cannabis factory in our neighborhood. We live in Rancho Tierra Del Sol, a lovely, upscale neighborhood of about 100 homes located between Ave K and Ave J and between 35th and 40th St East in Lancaster, CA. Our lives will be very negatively impacted if this business were to be built in the location you have designated. It will seriously damage our quality of living and cause our property values to plummet. It will create unsafe traffic conditions. It will increase crime and our insurance costs. It will cause an unsavory smell to permeate the whole area. It will affect our water wells. It will have a negative moral and physical effect on our neighborhood including the many schools and churches located here. It will become a hang-out for the homeless.

Traffic Safety --Your proposed building site at 40th St East and Ave K is already on traffic overload. It is a main artery to the aerospace industry located along Ave. M between Sierra and 50th St East. It is also a hub which furnishes immediate access to many schools and churches. These include Eastside High School, Enterprise Elementary School, Columbia Elementary and Cole Middle School. Your proposed site is next to an important place in our community which is the Lancaster Baptist Church mega-complex. The church has at least 5,000 members and includes a pre-school, a K through 12 school and a university which attracts students nation-wide. The church offers frequent outstanding musical productions for the entire community. More traffic in this area as well as motorists under the influence of cannabis would be a safety hazard.

Negative Influence on Vulnerable Populations -- The schools and churches as well as residents will be less safe with increased traffic but also demoralized by the presence of drug production and sales in their neighborhood.

Crime - A cannabis business would attract crime to our neighborhood. People on drugs are generally looking for money to support their addictions and will be burglarizing our neighborhood.

Homelessness -- A cannabis business would attract the homeless to our neighborhood as drugs are integral to their live-style. They will move into our area and rob and desecrate us.

..

Water Wells. This business would sap water already needed for the existing agriculture, homes, schools and churches in our neighborhood.

Locating a cannabis business in our neighborhood would be devastating and unacceptable to this neighborhood. It would take away our lovely quality of living and destroy our property values. It would destroy our dreams and what we all have spent our lives to build here. Such a controversial and objectionable facility must be located in a more remote place where it cannot so severely impair the lives of so many people. We thank you for finding a more appropriate location for a

business of this kind..

Sincerely,
Virginia Shields
Rancho Tierra Del Sol
Lancaster, CA 93535

From: [Virginia Shields](#)
To: [Campana, Cynthia](#)
Subject: Re: Rancho Tierra Del Sol Cannabis protest
Date: Tuesday, November 15, 2022 10:08:16 AM
Attachments: [image214831.png](#)
[image191316.png](#)
[image170401.png](#)
[image112713.png](#)

You don't often get email from highmansions@gmail.com. [Learn why this is important](#)

Thank you for your response.

We are delighted that the cannabis facility will not be in our neighborhood.! Thank you for your prudence and aesthetic and moral discernment.

We also are very concerned that the aesthetics which we enjoy by living along 40th St East not be destroyed by inappropriate rezoning. Presently there is here a magnificent view of open space, sun-rises and the San Gabriel Mountains- A blessing to the spirit. Lancaster should show its ability to value our inheritance of beauty all around us here by preserving it as much as possible. The city needs to capitalize on it, not destroy it. Lancaster needs to be a gem in the desert. This beauty makes us unique and a coveted place to live. What good is it to live in a glorious setting but not be able to have a view of it? The city has an obligation to businesses, but equally so to homeowners and residents that wish to thrive in our magnificent atmosphere. I am reminded of London, England which so long ago bound itself with "green belts" to protect their city residents from the ugliness, sterility and and frenzy of congested city life. Thank you for your wisdom and sensitivity as you carry out your purpose to best serve the city of Lancaster and its residents.

Blessings,
Virginia Shields

On Mon, Nov 14, 2022 at 1:22 PM Campana, Cynthia <ccampana@cityoflancafterca.gov> wrote:

Hello,

I have received your email and thank you for your input. Please let me know if you need anything else.

Cynthia Campana

Senior Planner - DS – Community Development

City of Lancaster

44933 Fern Ave. | Lancaster, CA 93534

T 661.723.6262

ccampana@cityoflancafterca.gov | cityoflancafterca.gov



-----Original Message-----

From: Virginia Shields <highmansions@gmail.com>

Sent: Wednesday, November 9, 2022 6:04 PM

To: Campana, Cynthia <ccampana@cityoflancafterca.gov>

Subject: Rancho Tierra Del Sol Cannabis protest

[You don't often get email from highmansions@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms Campana,

We are writing you to protest the building of a cannabis factory in our neighborhood. We live in Rancho Tierra Del Sol, a lovely, upscale neighborhood of about 100 homes located between Ave K and Ave J and between 35th and 40th St East in Lancaster, CA. Our lives will be very negatively impacted if this business were to be built in the location you have designated. It will seriously damage our quality of living and cause our property values to plummet. It will create unsafe traffic conditions. It will increase crime and our insurance costs.

It will cause an unsavory smell to permeate the whole area. It will affect our water wells. It will have a negative moral and physical effect on our neighborhood including the many schools and churches located here. It will become a hang-out for the homeless.

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More traffic in this area as well as motorists under the influence of cannabis would be a safety hazard.

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Water Wells. This business would sap water already needed for the existing agriculture, homes, schools and churches in our neighborhood.

Locating a cannabis business in our neighborhood would be devastating and unacceptable to this neighborhood. It would take away our lovely quality of living and destroy our property values. It would destroy our dreams and what we all have spent our lives to build here. Such a controversial and objectionable facility must be located in a more remote place where it cannot so severely impair the lives of so many people. We thank you for finding a more appropriate location for a business of this kind.

Sincerely,
Virginia Shields
Rancho Tierra Del Sol
Lancaster, CA 93535

From: [Zach Glenning](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Wednesday, November 9, 2022 10:02:35 AM

You don't often get email from zglenning@gmail.com. [Learn why this is important](#)

Hello Ms. Campana,

I am emailing you as a resident of East Lancaster to express my opposition to the cannabis-related industry that is included in the new Eastside Overlay Project. I do not think it will have a positive impact in our community and could certainly have a negative impact. I appreciate your consideration of my concerns and service to our community!

From: [Amy Houk](#)
To: [Campana, Cynthia](#)
Cc: [Mann, Ken](#); [Gonzalez, Tamara](#); [Malhi, Raj](#); [Dorris, Darrell](#)
Subject: Eastside Overlay Project
Date: Thursday, November 10, 2022 4:37:46 PM

You don't often get email from amyrhok@gmail.com. [Learn why this is important](#)

Dear Council Members and Ms. Campana,

It has come to my attention that there is a proposed overlay coming to the Eastside of Lancaster.

While I am not opposed to zoning changes opening our community up to industry, **I am opposed and concerned at the possibility of a cannabis facility so close to where I live and work.**

The history of cannabis has shown that this is often a gateway drug, especially when children or teens are exposed to it before adulthood. With several schools and neighborhoods being in this proposed overlay, my concern is that it will not only encourage use of cannabis, but it will also bring in the wrong types of clientele to the Eastside of town. Instead of “cleaning up the Eastside,” I believe this will only make it worse.

Cannabis has directly effected two young men I grew up with when they got involved with a grow area up in Northern California, similar to the one that is being proposed for Eastside Overlay Project. They are both in prison today for crimes that they did under the influence of this drug, as well as other drugs that they were introduced to while working in this industry.

For the sake of our young people and community, I ask that you reconsider this overlay project. Even if it's just removing the cannabis aspect of it. I know you all love our city as I do, and I'd like to see it improve not decline... I don't believe this is a way that will help our community.

Thank you for serving our community and for trying to do your best to help it grow... but let's find a safer, better way to do that than adding another cannabis facility in the area!

Thanks for reading this!

Amy Houk
3556 Topaz Lane,
Lancaster, CA 93535

Subject: Eastside Overlay Project

Date: Thursday, November 10, 2022 at 4:37:45 PM Pacific Standard Time

From: Amy Houk

To: Campana, Cynthia

CC: Mann, Ken, Gonzalez, Tamara, Malhi, Raj, Dorris, Darrell

Some people who received this message don't often get email from amyhouk@gmail.com. [Learn why this is important](#)

Dear Council Members and Ms. Campana,

It has come to my attention that there is a proposed overlay coming to the Eastside of Lancaster.

While I am not opposed to zoning changes opening our community up to industry, **I am opposed and concerned at the possibility of a cannabis facility so close to where I live and work.**

The history of cannabis has shown that this is often a gateway drug, especially when children or teens are exposed to it before adulthood. With several schools and neighborhoods being in this proposed overlay, my concern is that it will not only encourage use of cannabis, but it will also bring in the wrong types of clientele to the Eastside of town. Instead of "cleaning up the Eastside," I believe this will only make it worse.

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For the sake of our young people and community, I ask that you reconsider this overlay project. Even if it's just removing the cannabis aspect of it. I know you all love our city as I do, and I'd like to see it improve not decline... I don't believe this is a way that will help our community.

Thank you for serving our community and for trying to do your best to help it grow... but let's find a safer, better way to do that than adding another cannabis facility in the area!

Thanks for reading this!

Amy Houk
3556 Topaz Lane,
Lancaster, CA 93535

From: [Bethany Powell](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Thursday, November 10, 2022 9:03:11 AM

You don't often get email from thebethanypowell@gmail.com. [Learn why this is important](#)

Hello,

I would like to express my opposition to any cannabis-related activity in the Eastside overlay project. I believe the smell, aesthetic, and activities that surround the cannabis industry will be a huge detriment to the Eastside. The overlay proposal appears beneficial aside from the cannabis facility. Please take the health and safety of us, the nearby residents into consideration as this project proceeds.

Sincerely,

Bethany Powell

From: [Deanne Dona](#)
To: [Campana, Cynthia](#)
Cc: [Parris, R Rex](#); [Crist, Marvin](#); [Mann, Ken](#); [Malhi, Raj](#); [Dorris, Darrell](#)
Subject: Opposition to Cannabis Industry in Eastside Overlay
Date: Thursday, November 10, 2022 3:47:42 PM

You don't often get email from deannedona@gmail.com. [Learn why this is important](#)

To whom it may concern:

This email is to confirm my opposition to the cannabis industry being included in the Eastside Overlay project. I would also like to request more information to understand the purpose and planning of the overlay.

Thank you,

Deanne Dona

From: [DDemirjian](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Thursday, November 10, 2022 9:40:03 PM

You don't often get email from dhisteach@aol.com. [Learn why this is important](#)

Dear Ms. Campana,

Thank you for serving the city of Lancaster.

I am writing to voice my opposition to the inclusion of any cannabis-related industry in the Eastside Overlay project.

I would also kindly ask the city to provide further information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Deborah Demirjian

From: [John & Samantha Alvarez](#)
To: [Campana, Cynthia](#)
Cc: [John & Samantha Alvarez](#)
Subject: Proposed Eastside Overlay
Date: Thursday, November 10, 2022 11:51:42 AM

You don't often get email from jnsa2z@gmail.com. [Learn why this is important](#)

Ms. Campana,

My wife and I recently learned of the City of Lancaster's Eastside Overlay plan. We live at 43745 Rykebosch Lane, which is within one-half mile of the proposed cannabis facility as described in the overlay plan. We built our home in 2004 and love our neighborhood. Our neighborhood is composed of custom homes on one acre lots.

To say the very least, we were surprised the City of Lancaster would take such a dim view of the neighborhoods of East Lancaster. There are thousands of Lancaster residents who live within two miles of the proposed cannabis facility. There are also three schools (Eastside High School, Enterprise Elementary School, Lancaster Baptist School) and a college (West Coast Baptist College) all located within one mile of the proposed cannabis facility.

We are opposed to any type of cannabis facility being brought into the immediate area of our East Lancaster neighborhoods. We believe our quality of life will be impacted by the proposed cannabis facility.

Crime will undoubtedly increase in our area due to this facility. This type of facility will attract the criminal element who will attempt either robbery or theft or other violent crimes. We do not want crime to increase in our low crime neighborhoods.

The water demand which this type of facility will require will greatly impact our current diminished water base. This type of facility will require great amounts of water to grow their cannabis product. Our neighborhoods can only water our yards and plants twice a week during current water rationing restrictions.

The electrical power demands required by this cannabis facility will also impact our already stretched power grid. The lamps used for this type of facility will be on all night and use great amounts of electricity. This will put a further strain on our fragile electrical grid. Not long ago the state of California was admonishing people not to charge their electric vehicles due to the strain on the state's electrical grid.

The traffic in our neighborhoods will increase due to the the cannabis facility being built across the street from our homes. The intersection at 40th Street East and Avenue K are already extremely busy intersections.

The value of our homes will undoubtedly be impacted by the proposed cannabis facility being built within a stone's throw of our homes. Who would want a cannabis facility to be basically in their back yards?

The stench of the cannabis plants will permeate our area without a doubt. We do not want this stench to surround our homes and neighborhoods. The Lancaster National Soccer Center fields are located one half mile from the proposed facility. How many people from all over

the state are going to want to come to Lancaster when they can smell the cannabis stench coming from the grow and processing area? This will impact businesses who depend on these dollars to boost their incomes.

Lancaster Baptist Church, which is one of the largest churches in Southern California is located one mile from the proposed facility. What is more important to the city of Lancaster, cannabis tax money or helping people to not use cannabis and be better citizens? We see what drugs are doing to our city, state and nation.

We are not for any more of this type of cannabis facilities being built in our neighborhood or our city.

We would rather our valley be know as the "Aerospace Capital" of the country than the "Cannabis Capital" of the country.

We DO NOT want the proposed Cannabis facility to be built near our Eastside neighborhoods. We are saddened the City of Lancaster did not appear to consider what was best for us on the Eastside. Please reconsider allowing this cannabis facility to be placed in the proximity of any of our wonderful Lancaster neighborhoods.

Thank you for taking the time to read our thoughts and desires on this subject which is near and dear to our hearts.

John & Samantha Alvarez
43745 Ryckebosch Lane
Lancaster, Ca 93535
661-713-5553

Dear Councilmember Ken Mann,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project.

Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Jay Blakley

J. Blakley
45322 Stadium Ln.
Lancaster, CA 93535

SANTA CLARITA CA 913

10 NOV 2022 PM 2 L



~ Ken Mann ~
City of Lancaster
Attn: Cynthia Campana
44933 Fern Ave. Sr. Pla
Lancaster, CA 93534

95064-240000

Subject: Eastside Overlay Project

Date: Thursday, November 10, 2022 at 2:19:53 PM Pacific Standard Time

From: Kristi Anne

To: Parris, R Rex

CC: Gonzalez, Tamara

Some people who received this message don't often get email from kristi.anne220@gmail.com. [Learn why this is important](#)

Dear Mayor Paris,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Kristi Longhofer

From: [Kristi Anne](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Thursday, November 10, 2022 2:20:19 PM

You don't often get email from kristi.anne220@gmail.com. [Learn why this is important](#)

Dear Ms. Campana,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Kristi Longhofer



Lancaster Baptist Church

November 10, 2022

City of Lancaster
Development Services
44933 Fern Ave
Lancaster, CA 93534
Attn: Larissa Del La Cruz, Senior Manager

Dear Ms. Del La Cruz,

Upon our discussion and mutual agreement, as land owners, agents, and representatives of Lancaster's Eastside residents, we jointly request that the City of Lancaster amend the Notice of Preparation of a Draft Environmental Impact Report for the Eastside Overlay to exclude "commercial cannabis activity" from the stated approved uses of the Light Industrial Overlay Zone.

Respectfully,

Pastor Paul Chappell, Lancaster Baptist Church

Daniel Clifford, Bolthouse Properties, LLC

Brandon Calandri

Cc: Rex Parris, Mayor
Jason Caudle, City Manager

lancasterbaptist.org
661.946.4663
661.946.2620 fax
4020 E. Lancaster Blvd
Lancaster, CA 93535
Paul Chappell, Pastor

From: [paul choi](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Thursday, November 10, 2022 1:11:28 PM

You don't often get email from paul.jin.choi@gmail.com. [Learn why this is important](#)

Dear Cynthia Campana

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Paul Choi
661.471.6588

From: philchapman@twc.com
To: [Campana, Cynthia](#)
Subject: Eastside Overlay project
Date: Thursday, November 10, 2022 11:25:58 AM

You don't often get email from philchapman@twc.com. [Learn why this is important](#)

Dear Cynthia

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Phil Chapman

Nov. 10, 2023

Dear Mr. Campana -

This is to confirm my (our) 100%
opposition to ANY CANNABIS RELATED
INDUSTRY BEING INCLUDED IN THE
EASTSIDE OVERLAY PROJECT. Furthermore,
I sincerely request more
information and hearings to
understand the purpose &
planning of the overlay.

Toby & Rita Weqvad
43707 Robiev St.
CA
CAN 93535

From: [Albert Healy](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Friday, November 11, 2022 6:46:27 AM

You don't often get email from albert.healy@lancasterbaptist.org. [Learn why this is important](#)

Dear Miss Campana

I strongly oppose any cannabis related industry being included in the Eastside Overlay project. There are enough cannabis farms for medical use. An expansion of cannabis farms is to further invite more homelessness and other drug use such as fentanyl into our communities.

Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Albert Healy

November 11, 2022

Brenda Rasmussen & Josefa Silva
3851 Paula Ln
Lancaster, CA 93535

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

Dear Ms. Campana,

We are writing to express our opposition to the rezoning of the Eastside Overlay from rural residential to light industrial and our opposition to the development of a cannabis facility in the overlay zone. As residents of the Rancho Tierra del Sol community the rezoning and cannabis facility will directly affect our neighborhood. Not only will it affect our way of life, it will also greatly affect property values, personal health and safety.

When we were looking to purchase property 12 years ago, we were looking for a place that had a rural feel to it while still being close to services in the city. The Rancho Tierra del Sol community fit the bill perfectly. The properties were on 1-acre parcels with no street lights or sidewalks and with agricultural fields across the street. When we reviewed the master plan for the city, we knew those parcels east of 40th St East were all zoned for rural residential. This meant we didn't have to worry about potential commercial or industrial businesses being developed nearby.

The general plan for the City of Lancaster specifically mentions the need for buffer and transition areas between different types of zoning. If the area is rezoned to light industrial starting at 40th St East, there will be no transition or buffer zone between our rural residential neighborhood and the industrial zone right across the street. Rezoning to light industrial, specifically starting at 40th St East, is not consistent with neighborhoods developed in the area.

This rezoning would affect our quality of life and those of our neighbors. If industrial businesses are allowed to be developed across the street from our neighborhood, there will be noise issues from the increased traffic as well as from any machinery needed for the businesses. There will be increased pollutions in the air, some of which may cause health issues. With winds coming from the east during certain months, the smells from any businesses, and specifically from any cannabis facilities, will be unbearable and we will not be able to enjoy being outdoors. We will not be able to leave our windows open due to the increased noise and pollutants, nor sit outside and enjoy the quiet that we now enjoy in our neighborhood.

There are also the water issues that need to be considered. For many years now, we've been asked to conserve and cut back on our water usage due to the ongoing drought in the entire state. As a result, we've lost several trees to pest and disease due to the stress of the drought. We've all been

doing our part in conserving this precious resource. We've been reading about all the stealing of water that has been happening for all the illegal grow sites that have been popping up in the unincorporated areas of LA County. We all know how much water a cannabis facility will use. We should be trying to solve the water shortage issue, not allow more usage from a cannabis facility.

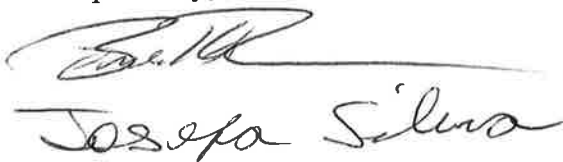
Although the California Water Board works to ensure that the affect to our water quality remains safe where cannabis growers apply and are granted a permit for cannabis cultivation, the process of growing cannabis includes many concerns. Besides the water usage concerns, the use of pesticides will also contribute to the degradation of our water quality. It will also affect the wildlife in the area and will eventually percolate to the groundwater table. This will not only contribute to the degradation of the water quality in our neighborhood, but may also affect the water supply for potable water in the future.

Since the proposed cannabis facility will not only grow, but distribute and deliver, there will most certainly be an increase of crime in our neighborhood. With three schools in the area adjacent to the proposed rezoning area, this most certainly isn't the best place for a cannabis facility.

In addition, if the area is rezoned and the cannabis facility is allowed to be built, the property values in our neighborhood will most certainly decrease. No one will want to buy property near a light industrial zone and certainly not near a cannabis facility. We know we wouldn't have if the parcel across the street from us had already been rezoned prior to us purchasing our home. We would have known that businesses could be approved at any time. If anyone in our neighborhood needs to sell their property, it will be almost impossible if these changes are allowed to go through.

We understand the need for development to continue in the city as it grows, but we ask that you please reconsider the rezoning of the areas near Rancho Tierra del Sol and to not allow a cannabis facility to be built near our neighborhood and area schools. If the city feels that the area is being underutilized, please utilize it by creating more rural homes and more services and businesses for the residents that live on the east side of Lancaster. If a rezoning must happen, please consider moving it further east to start at 60th St East. This would allow for a transition and buffer zone between established rural residential neighborhoods like Rancho Tierra del Sol and the newly zoned parcels.

Respectfully,

A handwritten signature in black ink, appearing to read "Josefa Silva". The signature is written in a cursive, flowing style.

Brenda Rasmussen & Josefa Silva
Rancho Tierra del Sol Residents

From: [Chelsea Kinney](#)
To: [Campana, Cynthia](#)
Subject: Attention Cynthia Campana
Date: Friday, November 11, 2022 3:21:17 PM

You don't often get email from chels.kinney@gmail.com. [Learn why this is important](#)

Dear Mrs. Campana,

I am writing to you in regards to the Eastside overlay project. I am a homeowner in the skytower park neighborhood with 4 young kids. This development would be detrimental to our housing area along with this side of town. This is the best part of the eastside and a very family friendly community. I do not want my kids growing up around marijuana plants or seeing them anywhere near my home. The soccer center is over here and is such a nice place for the community. These plants would destroy this part of town and is not needed near schools or parks, I hope this will be stopped immediately. If I can be of any further assistance, I can be reached at 7609770307.

Sincerely
Chelsea Navarro

From: [Debbie](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Friday, November 11, 2022 8:21:49 AM

[You don't often get email from cjdylan1@msn.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms Campana,

This email is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I would like to request more information to understand to purpose and planning of the overlay.

Sincerely,
Deborah Messerschmidt

Sent from my iPhone

From: [George Crabb](#)
To: [Campana, Cynthia](#)
Subject: Cannabis Facility 40th & Ave K
Date: Friday, November 11, 2022 2:33:28 PM

[You don't often get email from drcrabbdo@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

I ask that you do not allow the cannabis facility to be built at 40th & Ave K. I live in the area and I would prefer not to have this type of business near my residence.

Your consideration is appreciated.

George Crabb

Sent from my iPhone

From: [Herina Kim](#)
To: [Campana, Cynthia](#)
Subject: NO CANNABIS PLEASE.
Date: Friday, November 11, 2022 4:08:57 PM

[You don't often get email from herina222@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

To Whom It May Concern:

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Herina Kim

From: [Juliann Atherton](#)
To: [Campana, Cynthia](#)
Subject: Opposition to Cannabis Related Industry
Date: Friday, November 11, 2022 4:45:21 PM

You don't often get email from aaronandjuliann@yahoo.com. [Learn why this is important](#)

Good afternoon,

I understand that the City of Lancaster is proposing a legal cannabis facility on the eastside of Lancaster as part of the Eastside Overlay Project. As a resident of the Sky Tower Park Community, I wanted to write to let you know that I am opposed to any cannabis related industry being included in the Eastside Overlay Project. I hope that more information and hearings would be made to the public especially communities that would be affected.

Sincerely,

Juliann Atherton

From: [Lauren Blaszczyk](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay Opposition
Date: Friday, November 11, 2022 2:17:03 PM

You don't often get email from lauren Elizabethb14@gmail.com. [Learn why this is important](#)

To whom it may concern,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Lauren Barnes

From: [Linda Crabb](#)
To: [Campana, Cynthia](#)
Subject: NO cannabis facility
Date: Friday, November 11, 2022 2:29:44 PM

[You don't often get email from lcrabb14@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Please don't allow the cannabis facility to be built at 40th and K!!
I live near there and I don't want the crime and other unpleasant side effects it will bring!!!

Sincerely,

Linda Crabb

Sent from my iPhone

From: [Nicholas Piervicenti](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Friday, November 11, 2022 3:08:36 PM

You don't often get email from npiervicenti@gmail.com. [Learn why this is important](#)

Dear Cynthia,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Nick Piervicenti
(Lancaster Resident)

From: [Sofia Brim](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Friday, November 11, 2022 9:16:39 AM

You don't often get email from fia.brim@gmail.com. [Learn why this is important](#)

Dear Ms. Campana,

This email is to confirm my opposition to any cannabis-related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Sofia Brim

From: [Frank Quichocho](#)
To: [Campana, Cynthia](#)
Subject: Objection to Eastside Overlay
Date: Saturday, November 12, 2022 8:09:57 PM
Attachments: [Objection to Eastside Overlay.pdf](#)

You don't often get email from frank.quichocho@gmail.com. [Learn why this is important](#)

Hello Cynthia,
Please record and file.

Hope to see you soon :)
Have a great day

Frank Quichocho
"Love All - Trust a Few - Do Wrong to None."

Frank F. Quichocho
43837 Ryckebosch Lane
Lancaster, Ca 93535

To: Planning Commission

City of Lancaster
Attention: Cynthia Campana, Senior Planner
44933 Fern Avenue
Lancaster, California 93534

Date: November 12, 2022

SUBJECT: NOTICE OF PREPARATION (NOP) OF A DRAFT
ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE EASTSIDE OVERLAY

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.**

Dear Sir/ Madam,

I OBJECT to the above planning application for the following reasons:

- 1) I am wholeheartedly against any form of proposed cannabis facility that would include cultivation, manufacturing, distribution, and retail activities due to my law enforcement background, as a retired LASD Lieutenant, having worked at Narcotics Bureau, as an investigator during my tenure.
- 2) Cannabis businesses are typically considered investment risks. Federal illegality prevents financial institutions from lending money to cannabis operations, while insurance companies will not insure cannabis operators; therefore, they are predominantly considered as cash-based businesses complicating payment to vendors, employees, taxes, and transparency with federal, state, county, and city law enforcement.
- 3) Studies from Colorado have shown there have been an increase of drugged drivers and traffic related accidents due to driving while impaired (under the influence of marijuana); in addition to a surge in hospitalizations because of marijuana usage. As a former LASD narcotics investigator in the late '90's to early 2000, the levels of potency aka THC from cannabis production, have remarkably increased, resulting in serious addictions much like the opioid and fentanyl crisis.

- 4) Studies have also indicated that new strains of cannabis with deadly levels of THC are replacing alcohol and cigarettes as the leading entry-level and gateway drug-of-choice causing serious narcotics addiction, mental-illness, and severe depression in communities where cannabis facilities/retail sales are located.
- 5) The potential for an increase of property crimes in residential homes within a minimum of a five-mile radius is of grave concern.
- 6) The proposed cannabis facility is within walking distance to a bible college with dormitories for men/women (WCBC), a public high school (Eastside High), a public elementary school, and a private school (Pre-K to 12th grade). The close proximity of marijuana retail sales to minors is a conceivable factor.
- 7) With retail sales of marijuana at the proposed location there will most likely be armed security services during the hours of retail operation and armed-protection services for the grow operation 24/7/365; therefore, it is not inconceivable there will be armed-robbery attempts made due to the high-value products and large sums of cash associated with the mega-cash-crop-business. It is not a comforting experience to know if/when robberies occur the surrounding schools will be placed on lock-down as bullets are zipping through the air. It is not only the element of crime it brings to a peaceful neighborhood, but a safety issue.
- 8) There will be increased traffic throughout the Rancho Tierra del Sol neighborhood from consumers of marijuana purchasing drugs from the cannabis facility. Years ago, when Eastside High was first built the neighborhood experienced increased traffic from people speeding through residential streets causing extreme concern for accidents; eventually, the city studied the problem resulting in the strategic placement of speed bumps on several streets to minimize traffic and speeders.
- 9) Having raised four kids in the Rancho Tierra del Sol neighborhood, I am passionately opposed to the cannabis facility. I was thankful my children did not have easy access and/or temptation to a marijuana retail sales store within walking distance from our home.
- 10) It is also difficult to comprehend why state, county and city laws are skirting federal law that considers cannabis a Schedule I drug and prohibits its manufacture, production, distribution and use. The waivers from state/county/city officials to accommodate the cannabis facility at the listed location in lieu of federal law for purposes of profitability is quite devastating.
- 11) The cannabis facility is certainly not within the character of the community of Lancaster, and residents of Rancho Tierra del Sol, as many of them are my closest friends.

I therefore urge the council to refuse this planning application based on the above listed objections.

Yours sincerely,
Frank F. Quichocho

From: [Heidi Haynes Homes](#)
To: [Campana, Cynthia](#); [Dorris, Darrell](#); [Mann, Ken](#); [Crist, Marvin](#); [Malhi, Raj](#); [Parris, R Rex](#); [Gonzalez, Tamara](#)
Subject: Eastside Overlay Project
Date: Saturday, November 12, 2022 11:03:48 AM

You don't often get email from heidihayneshomes@gmail.com. [Learn why this is important](#)

Hello, City of Lancaster:

As a resident of Lancaster, California; as a wife and mother of small children living feet from the proposed area in question; as a business owner buying and selling real estate in Lancaster; as an instructor with young students living in the direct vicinity—I strongly oppose to any cannabis related industry being included in the Eastside Overlay Project. This project is damaging in many ways to our health and to the value of our homes and should not be considered near a residential area.

Additionally, I would like more information and hearings to understand the purpose and planning of the overlay. I look forward to hearing from you. Thank you for your work to improve our city.

Sincerely,

Heidi Haynes

--

Sincerely,

Heidi Haynes
The Chappell Team Advantage
(843)813-9668

From: [jdlivs4jesus](#)
To: [Campana, Cynthia](#)
Subject: Direct comments to City of Lancaster
Date: Saturday, November 12, 2022 8:38:32 AM

Some people who received this message don't often get email from jdlivs4jesus@gmail.com. [Learn why this is important](#)

Dear Senior Planner and City Councilmembers,

This email is to express my opposition to any cannabis related industry being included in the Eastside Overlay project. I request more information and hearings to understand the purpose and planning of the overlay.

I was reading in my Bible this morning. Gods Word tells me in Ephesians 5:15-16

"See then that ye walk circumspectly. Not as fools, but as wise, redeeming the time because the days are evil. "

I will pray for you on Wednesday, Nov. 16th to have a open mind and heart as you hear the opinions of fellow people that live in the Antelope Valley.

For the future generations of the Antelope Valley!!

Jessica

From: [Sandy Jon](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay
Date: Saturday, November 12, 2022 2:36:26 PM

[You don't often get email from sndykjn83@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Cynthia,

I am a resident of the eastside that this change in zoning will directly impact in many ways.

For me, I live in a custom built tract and the homes are valued at \$600,000-\$750,000. Mine alone is at the high end of the value. Adding a Cannabis facility less than 1/2 mile from my home will make the value of my home decline and bring crime to our quiet housing tract.

We also have an elementary school, high school and the Lancaster Baptist Church which has K-College students all less that a mile and a half from proposed facility.

By allowing this type of facility this close to homes & schools will bring down the area. Once you change the zoning and allow just one facility in - you will allow more to follow.

Please think this thru very carefully. There is still plenty of land in the much farther east in the valley that putting in a cannabis facility will not impact the residents of the housing tracts.

Presently there is a supposed illegal grow on the NW corner of Ave K and 40th St. East. This is a 13 acre parcel and had a raid in April of 2021 that shut down the illegal grow. But there is now activity again on that piece of property and the smell of the cannabis is daily. The property is so run down that the roofs are off the house and out buildings, a real eye sore.

The proposed cannabis facility will not be pleasant to the passer by. Retail delivery will increase traffic in the immediate area and if the area is lit with lighting at night, it will impact the neighbors that live along Ave K.

Your proposed overlay area is and has been used for crops in the 30+ yrs that I have lived in my home. If you allow one end of the property for cannabis use - would you allow more to follow in the rest of the overlay area???

Please do not allow this to happen.

Jon & Sandra Kredo

43626 Devyn Ln

Lancaster CA 93534

From: [Laurel Mccrary](#)
To: [Campana, Cynthia](#)
Cc: [Laurel Mccrary](#)
Subject: Eastside Overlay
Date: Saturday, November 12, 2022 3:58:35 PM
Attachments: [Opposition to Eastside Overlay Plan.docx](#)

You don't often get email from laurelmcc@aol.com. [Learn why this is important](#)

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

Please see the attached document in which I have expressed my opposition to the Eastside Overly Project. I am a 39 year resident of Rancho Tierra del Sol subdivision and I would hate to see this quiet neighborhood negatively impacted by the proposed zoning changes.

Thank you for reading my correspondence.

Sincerely,

Laurel McCrary

DATE: November 12, 2022

TO: City of Lancaster
Attention: Cynthia Campana, Senior Planner

FROM: Laurel McCrary, (661)992-4621
3830 Paula Lane
Lancaster, CA 93535

SUBJECT: Eastside Overlay Plan

As one of the original residents of the Rancho Tierra del Sol subdivision for 39 years, it is with much disappointment that the City of Lancaster is proposing to establish a Light Industrial Overlay Zone near the subdivision. The property value of Rancho Tierra del Sol will be affected because of its proximity to an industrial zone. The charming aesthetics of the subdivision will be nullified and may affect the buying and selling of homes.

A Light Industrial Overlay Zone of 5,841 acres will highly impact the air quality in a region that includes over 200 residences, four schools, a university, and a church. The noise from heavy equipment, retail business, and delivery will be disruptive to residents near the facility.

Even though there is a four-way stop at the corner of Avenue K and 40th Street East, I have witnessed drivers running through the intersection without stopping. There have been three fatalities at that crossroad. Now, can you imagine what is possible when impaired clients of the cannabis facility take to the roadway.

Regarding the proposed cannabis facility at 43200 40th Street East, the project includes 480 acres why cannot it be built on acreage further east of 40th Street East, away from an established subdivision? Or a better option would be to utilize underdeveloped land in the remote and under-utilized land of Antelope Valley. Excessive traffic and crime will surely follow such an establishment.

Please do not rezone the area to Light Industrial Overlay Zone let the Eastside of Lancaster have an aesthetic residential area just like the Westside has. City planners, would you want this project in your backyard?

Sincerely,

Laurel McCrary
Laurel McCrary

From: [Mike Haynes](#)
To: [Dorris, Darrell](#); [Mann, Ken](#); [Crist, Marvin](#); [Malhi, Raj](#); [Parris, R Rex](#); [Gonzalez, Tamara](#); [Campana, Cynthia](#)
Subject: Eastside Overlay Project
Date: Saturday, November 12, 2022 11:28:02 AM

You don't often get email from mike@markchappell.com. [Learn why this is important](#)

Hello, City of Lancaster:

I am a resident of Lancaster, California, living near Avenue K and 40th Street East in the Rancho Tierra Del Sol neighborhood. I am also a real estate agent with Keller Williams and am involved daily in helping others invest in real estate in Lancaster and the Antelope Valley. I strive to contribute to our community in a positive way. Having said that, I oppose to any cannabis-related industry being included in the Eastside Overlay Project. I cannot in good conscience stay quiet and cannot believe that this project is being considered so close to our homes. I am asking that the city please not allow this to happen.

I would also like more information and hearings to understand the purpose and planning of the overlay. Thank you.

Looking forward,

Mike Haynes | Real Estate Listing Specialist with Keller Williams Realty, Southern California
| The Chappell Team Advantage | [661-449-2119](tel:661-449-2119) |
mike@markchappell.com
<https://search.markchappell.com>

From: [Rachel Gonzalez](#)
To: [Campana, Cynthia](#)
Subject: Eastside Overlay project, Attention: Cynthia Campana, Senior Planner
Date: Thursday, November 10, 2022 1:54:43 PM

You don't often get email from isainrachel23@gmail.com. [Learn why this is important](#)

Dear Cynthia,

This is to confirm my opposition to any cannabis related industry being included in the Eastside Overlay project. Furthermore, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,
Rachel Gonzalez

From: [Amado Galdamez](#)
To: [Campana, Cynthia](#)
Subject: Objection to Cannabis Facility
Date: Monday, November 14, 2022 9:19:25 AM
Attachments: [BF99B90882334BBE843A53C979DCC71B.png](#)

You don't often get email from amadogaldamez@gmail.com. [Learn why this is important](#)

Cynthia,

Hope you are having a great start to your week.

My name is Amado Galdamez, residing at 43652 Ryckebosch Lane, Lancaster, CA 93535.

I am writing to state my objection to the building of the Cannabis facility 43200 40th St. East.

This facility would be near residential area and in close proximity to many schools. Studies, at best are mixed and tend to indicate that these sort of facilities would increase the crime rate in a neighborhood (<https://www.tandfonline.com/doi/full/10.1080/07418825.2019.1567807>).

We cannot afford this given the proximity to school and homes.

Thank you for your attention and hope you have a great day.



Andres Campoverde
40266 Ronar Street
Palmdale, CA 93591

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ZIP 93535
041M11467992

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

334-248359



Dear Cynthia Campana,

I was recently informed of a plan called the "Eastside Overlay" with the proposition of converting land to a light industrial zone with the purpose of allowing a cannabis facility. I am completely opposed to this plan as a parent of a girl that is seven years old that currently attends to a school a mile away from this facility. The attraction of men and women of a lessened ability to think through the use of cannabis near my daughter is of great concern. And not just my daughter, but a lot of children too. I don't think any type of facility that provides these type of services should be near to any school or college. We must protect our little ones, and if you think marijuana doesn't affect people's behavior, you might need to do research on that. I hope you understand a parent that wants to protect his children.

Andres C

Dear Cynthia Campana,

I was recently informed of a plan called the "Eastside Overlay" with the proposition of converting land to a light industrial zone with the purpose of allowing a cannabis facility. I am completely opposed to this plan as a nearby resident. To allow the manufacturing of cannabis near my home endangers my family. We need men of sober minds. The attraction of men and women of a lessened ability to think through the use of cannabis near my home is of great concern. I am totally against any type of cannabis facility due to biblical conviction but if you are going to allow one to be built, please build it elsewhere. Thank you for taking my thoughts into consideration.

David Wruck



534-24899

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

ZIP 93535
041M11467992



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11/14/2022

Lancaster CA 93535
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David Wruck

Dear Mrs. Campana,

This letter is confirming my opposition to any cannabis related industry being included in the Eastside Overlay project. Also, I request more information and hearings to understand the purpose and planning of the overlay.

Sincerely,

Justin Neal

Justin Neal
43958 18th Street East
Lancaster, CA 93535

SANTA CLARITA CA 913

14 NOV 2022PM 2 L

NEOPOST

11/14/2022

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ZIP
041M

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

From: [Eurtacia Bodle](#)
To: [Campana, Cynthia](#)
Subject: Cannabis Facility APN 3170-012-002
Date: Tuesday, November 15, 2022 9:27:26 AM
Attachments: [s13223-020-00447-9.pdf](#)

You don't often get email from eurtacia@gmail.com. [Learn why this is important](#)

Good morning Ms. Campana,

I live 1500 feet from the proposed Cannabis Facility. I am deathly allergic to cannabis, eyes, ears, sinuses and throat swell closed. The emissions from the Facility could cost me my life if allowed to progress. I've attached an article regarding the allergen, one of many articles out there. I'm not in a position to move and I'm hoping someone will stop this before it causes harm to me and my family.

Eurtacia Bodle
Direct - 661-816-7042

SHORT REPORT

Open Access



An emerging allergen: *Cannabis sativa* allergy in a climate of recent legalization

Bradley Jackson¹ , Erica Cleto² and Samira Jeimy^{3,4*}

Abstract

Considering its recent legalization in Canada, the health implications of *Cannabis sativa* exposure, including allergy, are coming to the forefront of medical study and interest. *C. sativa* allergy is an issue that affects recreational users of the substance, processors, agricultural workers, and contacts of *Cannabis* aeroallergens and secondhand product. Allergies to *C. sativa* are heterogenous and span the spectrum of hypersensitivity, from dermatitis to rhinoconjunctivitis to life-threatening anaphylaxis. Due to its recent legalization, sensitized individuals will have increasing exposure from direct contact to agricultural pollens. Diagnosis and treatment of *Cannabis* allergy are developing fields that are already showing promise in the identification of culprit antigens and the potential for immunotherapy; however, much responsibility still falls on clinical diagnosis and symptom management. Hopefully, given the current explosion of interest in and use of *Cannabis*, *C. sativa* allergy will continue to garner awareness and therapeutic strategies.

Keywords: *Cannabis sativa*, Allergy, Marijuana

Background

Cannabis sativa allergy is a hypersensitivity that has recently been gaining relevance and is of particular interest due to recent legalization in Canada. Approximately 17% of Canadians, and 27% of those 25–24 years old, report *Cannabis* use within the past 3 months [1]. *Cannabis sativa* allergy is expected to increase as a consequence of legalization due to increased exposure. Additionally, as legal and stigma-related barriers to use subside, an unintentional side effect of legalization may be increased reporting of current suspected cases of *Cannabis* allergy. Given the potential for increases in existing and reported allergic reactions to *Cannabis*, building an understanding of *C. sativa* allergy spectrum, diagnosis, and treatment will be important moving forward.

The purpose of this article is to provide an overview of the current understanding of *Cannabis* allergy and place it within a Canadian context. This article also highlights that exposure extends beyond recreational use and includes second-hand exposure, ingestion, aeroallergen contact, and cutaneous contact.

Spectrum of *C. sativa* allergy

Cannabis is a complex genus of dioecious, annual, wind-pollinated herbs that diverged from *Humulus*—a small genus that includes *H. lupulus*, whose bitter female flowers form the hops used to flavor beer—approximately 27.8 million years ago [2]. *Cannabis* is among humanity's oldest crops with records of its use for food, fiber, medicine, and inebriation dating back over 6000 years. Despite its long history of use, its taxonomy remains disputed, with some suggesting a monotypic classification with several subspecies of *C. sativa* [2], and others suggesting three distinct species (*C. sativa*, *C. indica*, and *C. ruderalis*) [3, 4]. The biochemistry of *Cannabis* is similarly complex, with at least 118 cannabinoids and 489 described constituents, the most well know

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Full list of author information is available at the end of the article



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and psychoactive of which being tetrahydrocannabinol (THC) and cannabidiol (CBD) [5]. “Indica” varieties of *Cannabis* tend to have a higher THC content, and higher THC to CBD ratio than “sativa” varieties [2]. “Indica” varieties are known for a more mellow high and a terpenoid profile with an acrid, skunk smell, whereas “sativa” varieties are known for a more exciting high and a sweet, herbal aroma [2]. However, these strains are heterogeneous with genome-wide variability that is not limited solely to the genes involved in THC and CBD production [4].

Study of specific culprit *Cannabis* allergens is still in its infancy. A handful of IgE immunoblot experiments, summarized in Table 1, have identified several potential allergens. Of these, the *Cannabis* non-specific lipid transfer protein (nsLTP), Can s 3, was the first identified and is the best studied [6]. Thaumatin-like protein (TLP), ribulose-1,5-bisphosphate carboxylase oxygenase (RuBisCO), and oxygen evolving enhancer protein 2 have also been recognized as potential sensitizing allergens in *Cannabis* allergy [7, 8].

Cannabis sensitivity spans the spectrum of allergic response. As an aeroallergen, *Cannabis* pollen has been implicated in allergic rhinitis, allergic keratoconjunctivitis, hypersensitivity pneumonitis, and exacerbations of asthma symptoms [9] (Fig. 1a). Additionally, patients may experience cutaneous reactions in the form of generalized pruritus, contact urticaria, and angioedema. A case of occupational contact urticaria was reported in a forensic sciences technician who had regular occupational contact with *Cannabis* for a period of 2 years. She was neither a recreational user, nor an atopic or dermatographic

individual, suggesting sensitization specifically from repeated handling [10]. Erythema multiforme (in one case report) has also been associated with recreational consumption [11]. This individual experienced the eruption of vesicobullous, scaled, and targetoid rash on his distal extremities which progressed proximally to his trunk within a two-week period, waxing and waning synchronously with his use of *Cannabis* [11]. Anaphylaxis to *C. sativa* with hempseed ingestion, smoking, and injection have also been reported [12–14].

Cannabis has reasonably common, expected, but undesirable physiologic effects (conjunctival injection, sinus tachycardia, orthostatic hypotension, anxiety or panic reactions, dysphoria). It is important to not ignore or mis-attribute similar symptoms when the index of suspicion for a serious reaction or anaphylaxis is high [9].

Cannabis consumption also carries a risk to immunosuppressed patients in the form of microbiological contaminants, particularly when inhaled. *Aspergillus* has been isolated repeatedly from *Cannabis* samples [15, 16]. In one observational study, a majority of *Cannabis* users had antibody evidence of *Aspergillus* exposure compared to a minority of abstinent controls [17]. Furthermore, cases of pulmonary aspergillosis have been linked to contaminated *Cannabis* use in immunosuppressed populations [16, 17]. Fungal spores resist destruction from smoking and vaporization [18]. Thus, hypersensitivity and immunosuppression are clinically relevant states with regard to *Cannabis* consumption.

Table 1 Summary of possible *Cannabis* allergens

Molecular weight	Genbank nucleotide	Genbank protein	Description	Study
9 kDa	HE972341.1	CCK33472.1	Lipid transfer protein precursor, partial (chloroplast)	Gamboa et al. [6]
10 kDa	HE972341.1	P86838.1	Non-specific lipid-transfer protein	Larramendi et al. [7]
38 kDa	XM_030636673.1	XP_030492533.1	Thaumatin-like protein 1b	
53 kDa	JP454288.1	YP_009123081.1	Ribulose 1,5-bisphosphate carboxylase/oxygenase large subunit (chloroplast)	Nayak et al. [8]
54 kDa	JP462165.1	YP_009123080.1	ATP synthase CF1 beta subunit (chloroplast)	
29 kDa	JP475070.1	XP_030482568.1	Oxygen-evolving enhancer protein 2, chloroplastic	
49 kDa	JP458088.1	XP_030492156.1	Ribulose bisphosphate carboxylase/oxygenase activase, chloroplastic isoform X2	
52 kDa	JP451043.1	XP_030504809.1	Ribulose bisphosphate carboxylase/oxygenase activase 2, chloroplastic-like	
48 kDa	JP450816.1	XP_030507192.1	Glutamine synthetase leaf isozyme, chloroplastic	
51 kDa	JP458176.1	PON58274.1	Phosphoglycerate kinase (<i>Trema orientale</i>)	
47 kDa	JP473302.1	XP_030489218.1	Fluoride export protein 2-like isoform X1	
48 kDa	JP452228.1	PON90495.1	Glyceraldehyde-3-phosphate dehydrogenase, type I (<i>Trema orientale</i>)	

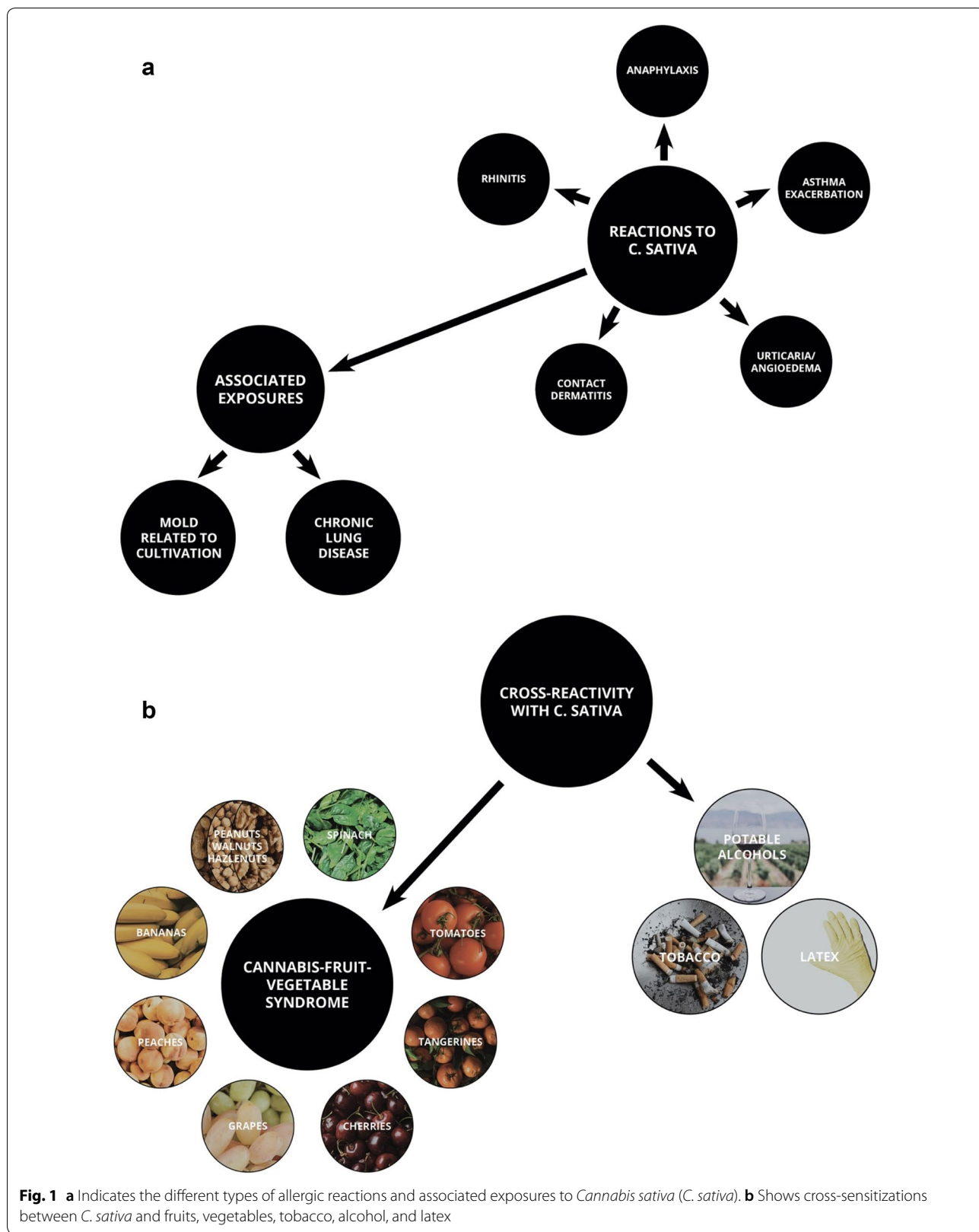


Fig. 1 **a** Indicates the different types of allergic reactions and associated exposures to *Cannabis sativa* (*C. sativa*). **b** Shows cross-sensitizations between *C. sativa* and fruits, vegetables, tobacco, alcohol, and latex

Sensitization to *C. Sativa*

Sensitization to *Cannabis* can occur via inhalation, cutaneous exposure, ingestion, and secondhand exposure, and can occur in recreational users and occupational handlers. Specifically, sensitization and reactions have been seen with smoking, consuming, injecting, and handling *Cannabis* plants, the latter being most germane to industrial workers [19–21]. As the *Cannabis* agricultural industry grows, *C. sativa* may also become a significant aeroallergen. Indeed, Canada's first large-scale commercial outdoor Cannabis farm began operations in mid-summer 2019 [22]. The potential role of *Cannabis* pollen as an aeroallergen has long been realized in agricultural regions. For example, in Nebraska, peak season pollen counts show *Cannabis* comprising 36% of the total airborne burden, and additionally correlating with a skin-test positive allergic symptom surge during mid to late August [23].

In light of this increase in *Cannabis* aeroallergen, we may also begin to see an increase in Cannabis-fruit/vegetable syndrome. As with other forms of food-pollen or oral allergy syndrome, Cannabis-fruit/vegetable syndrome is thought to occur due to structural homology and antigenic similarities between nsLTPs in *C. sativa* and those in cherry, tangerine, peach, tomato, hazelnut, latex, and tobacco (Fig. 1b), resulting in cross-sensitivity and reaction to consumption of these products [7, 9, 19]. However, unlike birch pollen-related food-pollen syndrome, Cannabis-fruit/vegetable syndrome may cause more severe symptoms (including anaphylaxis to previously tolerated fruit). Sensitization is bidirectional; i.e. sensitization to an nsLTP in fruits can cause subsequent sensitization to Cannabis [7, 19, 20]. Thus, a variety of exposure routes exist for *C. sativa* sensitization, and these sensitizations may be primary or cross-reactive.

Diagnosis of *C. sativa* allergy: an evolving practice

Clinical history is the cornerstone of diagnosing *Cannabis* hypersensitivity. As with any other allergic presentation, a complete history will include a detailed review of the presenting suspected reaction (Table 2). The history should also include a thorough review of atopic history, medical history, medications, social history including recreational and occupational exposures, and family history including atopy and asthma. With respect to diagnostic testing, the “gold standard” allergen challenge may not be appropriate in *Cannabis* allergy. Although Canadian law would permit access to and use of the substance unlike many regions, there is dispute regarding expected reaction phenotypes, particularly regarding varied and paradoxical lower airway response [20]. Thus, *Cannabis* graded challenge is

Table 2 Suggested prompts for a history of presenting suspected reaction to a *C. sativa* product

Suggestions for characterizing the history of a possible presenting reaction to *C. sativa*

Symptoms
Cutaneous (urticaria, contact dermatitis, etc.)
Gastrointestinal (vomiting, diarrhea, abdominal pain, etc.)
Respiratory (wheeze, cough, dyspnea, etc.)
Oropharyngeal/mucosal/conjunctival (nasal obstruction, palatal pruritis, eye pruritis, nasal discharge, etc.)
Other, as described or suspected by patient and clinician
Timeline of reaction
Chronological relation to suspected exposure (immediate vs. delayed)
Course of development of symptoms
Duration of symptoms
Frequency of symptoms
Dependency on exposure
Nature of exposure
Suspected allergen(s)
Route of exposure (oral, smoked, ingested, contact, etc.)
Dose dependency
Form (processed, whole plant, oil, etc.)
Reproducible
Exacerbating factors (alcohol, exercise, other known allergens present)

Adapted from consultation template prompts from the Division of Clinical Immunology and Allergy at St. Joseph's Healthcare in London, ON

not yet a viable, routine diagnostic option. Epicutaneous testing is currently not standardized for *C. sativa*. Skin testing described in current literature is heterogeneous and requires the suspension of marijuana buds, leaves, and/or flowers to be produced and administered by the allergist [20]. In vitro assays of serum specific IgE (sIgE), cytometric basophil activation (BAT), and basophil histamine release using crude extracts, purified components and recombinantly expressed allergens have shown promising results, but remain commercially unavailable [20, 21, 24, 25].

The isolation of specific *Cannabis* antigens will facilitate standardized skin prick and serum IgE testing. Recently, Decuyper et al compared specific IgE (sIgE) testing to hemp, sIgE to a recombinant Can s 3 (rCan s 3) protein, BAT to the same rCan s 3, and skin prick testing with a Can s 3 antigen-rich extract in diagnosing Cannabis allergy [20]. The Can s 3 extract, which is not commercially available, was prepared for study using methods previously described for isolating nsLTPs from tomato, with total protein quantification using Micro BCA Protein Assay [20, 24, 26]. The results of the comparison suggested that Can s 3 is the superior antigen for testing, and that skin prick and sIgE testing are effective and practical, with respective sensitivities

of 72% and 81% and specificities of 63% and 87% [20]. While promising, the authors address the clear issue of lack of commercial availability of these extracts. They suggest that, with current clinical limitations, a sIgE to hemp (which is currently available from Thermo Fisher) may be appropriate for diagnosis as only 18% of Cannabis sensitized individuals have negative IgE to hemp. However, it would still be ideal that a commercially available Cannabis extract become available.

Treatment of *C. sativa* allergy

The only proven, currently available treatment for *Cannabis* allergy is avoidance. However, when avoidance is impossible, treatment of *C. sativa* allergy is identical to that of other allergens: based on the index reaction to the substance. Treatment with antihistamines, intranasal corticosteroid sprays, and ophthalmic antihistamine drops can provide symptom relief [9]. All individuals with anaphylactic allergies should carry auto-injectable epinephrine. Treatment for Cannabis-fruit-vegetable syndrome is also dependent on avoidance.

Promising but limited case reports suggest future directions for the treatment of *Cannabis* allergy. For example, Engler et al. described an occupationally exposed individual with anaphylaxis to *Cannabis* who was successfully treated for with Omalizumab therapy [27]. Kumar et al. successfully implemented a perennial subcutaneous immunotherapy schedule that reduced a patient's symptoms of allergic rhinitis and asthma during *Cannabis* pollen season [28]. This was delivered as subcutaneous, twice-weekly doses starting with 1:5000 weight/volume of diluted antigen, beginning at 0.1 mL and increasing by 0.1 mL per injection to a target maintenance dose of 1 mL of 1: 50 antigen concentration per month for 1 year [28].

Hopefully, in light of the rise of *C. sativa* use and agriculture, desensitization protocols will become available for sensitive patients as demand increases. Nonetheless, avoidance and traditional methods of managing allergic reactions continue to be the basis of treatment for *Cannabis* allergy.

Conclusion

The legalization and accessibility of *Cannabis sativa* in Canada has created a renewed interest in the health implications of its use, including allergic and immunologic consequences. This brief review has highlighted the diversity of sensitization routes and reactions to the plant, emphasizing the heterogeneous presentation of *Cannabis* allergy. In addition, this article has underscored the fledgling nature of available testing and treatment options for *C. sativa* allergy. There have been recent, exciting advancements in isolation of

culprit allergens and clinical testing, although these are not yet applicable to general office use. At the moment, there are existing practical suggestions for diagnosing and treating *C. sativa* allergy, which will hopefully evolve in the coming years as Cannabis preparations and immunotherapy schedules mature and become commercially available. However, currently, a detailed allergy history with adjunct hemp sIgE testing are the cornerstones of diagnosis, and avoidance (in combination with standard symptomatic treatment) is the mainstay of treatment.

Abbreviations

C. sativa: *Cannabis sativa*; LTP: Lipid transfer protein; Ns: Non-specific; TLP: Thaumatin-like protein; sIgE: Serum immunoglobulin E; BAT: Basophil activation testing.

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BJ, EC and SJ contributed equally to the writing of this paper. SJ Initiated and coordinated the conception of the paper. BJ, EC and SJ gathered data and developed the manuscript. All authors read and approved the final manuscript.

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Consent for publication

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Competing interests

The authors declare that they have no competing interests.

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To: [Campana, Cynthia](#)
Subject: eastside overlay
Date: Tuesday, November 15, 2022 6:19:27 PM

You don't often get email from kallwayne@roadrunner.com. [Learn why this is important](#)

Cynthia Campana,

I am emailing you to state my objection to the cannabis facility being part of the eastside overlay zoning close to my neighborhood, as well as rezoning away from RR2.5 residential zoning to light industrial. Cannabis is a very polarizing issue within California and although its use is legal and even has beneficial medicinal use, it still evokes a significant negative response in many residents of Lancaster and Californians. For those potential homebuyers who object to its use, they will be less likely to buy near a cannabis facility, which will in turn affect property values. Our neighborhood, often referred to as the Ryckebosch track, is the only really nice neighborhood on the east side (I know that sounds a bit arrogant, but it is true). It occupies the parts of the city from 35th east to 40th east between Avenue K and J-8. I really want the city to try to put more nice neighbors on the eastside, there is lots of opportunity to do that. Light industrial zoning does not accomplish that nor does allowing a cannabis facility nearby.

Thank you for your time and consideration

Wayne Kallioma
43833 Shiloh Lane
Lancaster CA 93535

From: [Peter Conner](#)
To: [Campana, Cynthia](#)
Subject: Proposed Eastside Overlay Lancaster Light Industrial Zone
Date: Monday, November 28, 2022 2:06:16 PM

You don't often get email from pgconner78@gmail.com. [Learn why this is important](#)

City of Lancaster
Attention: Cynthia Campana, Senior Planner
44933 Fern Avenue
Lancaster, California 93534

I am writing to express my objection to the proposed East Lancaster Light Industrial overlay zone especially the proposed cannabis grow operations.

My family and I reside at 43214 50th St E and quite frankly, we enjoy our little bit of rural living that we have. The proposed overlay will completely surround our little neighborhood and I fear will bring crime and extra traffic volume to our area especially if the cannabis growing is allowed. Just down the street from us in the last year or so, there was an attempted armed robbery of a cannabis grow operation at the corner of Avenue K and 40th St E, with a gun fight ensuing. I for one DO NOT want that type of industry with the potential for that kind of violence right across the street from my house where I am raising my children and have elderly parents residing. In terms of the light industrial zone, it will create a heat trap in the summer and bring lots of extra traffic and trucks into our area.

I understand the desire and need for growth of the city, but please plan it elsewhere in the city. There are many small rural properties in this area between 40th & 50th Streets and south of K to L, that people have bought and moved here for the opportunity for a little privacy, a little land and a little peace and quiet. This proposed light Industrial zone will most certainly ruin what we all have sought for as well as hurt our property values.

Thank you for your consideration of my thoughts on this matter.

Sincerely,

Peter Conner
43214 50th St E
Lancaster, CA 93535
661.468.6140

3220 Kaylyn St.
Lancaster, CA 93535

RE: Eastside Overlay (rezoning 40th East and Avenue K area)

To Whom It May Concern:

I have been told that our city of Lancaster is proposing an "Eastside Overlay" to rewrite zoning of land near 40th East and Avenue K.

My family lives just off of 30th East and Avenue K-8.

A cannabis operation near my home would greatly impact our area, especially as it would be near two public schools, a private school, and also Skytower Park. There are many families with children who live around the park, and it will not help for us to allow something like this to happen.

As a family who is highly involved in the betterment of our community through ministry and also real estate, I urge you to reconsider this rezoning initiative. This will not make our families to be better or our neighborhoods to be safer.

Thank you for serving our community.

Sincerely,



Daniel Hopkins

Cell: (661) 992-4272

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

1. Increased crime in our area
2. Increase in water demand to an already diminished water base
3. Increase in electrical demand to our already fragile California electrical grid
4. Increase in traffic at 40th Street East and Avenue K
5. The stench of cannabis being grown will be ever present in our neighborhood
6. The very real decrease in property values to homes in our neighborhood

There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Carlos A. Ortiz

Signature:



Date:

11-12-22

Address:

43642 35th st E.

Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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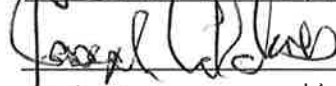
There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

JOSEPH CALDWELL

Signature:



Date:

11-12-2022

Address:

43656 35th ST EAST
LANCASTER CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Bill + Carrie Dranow

Signature: Bill Dranow Date: 11-12-22

Address: 43806 35th St. East
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

VICTOR GONZALEZ

Signature:

Victor Gonzalez

Date:

11/12/22

Address:

43834 35th ST. EAST

LANCASTER, CA. 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Bruce Jacobsen / Sue Jacobsen

Signature:

[Handwritten Signature] Date: 11-17-22

Address:

43818 35th E. 151
Lanc

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

James Johnson

Signature:



Date:

11-12-22

Address:

43722 35 St East
Lancaster

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: ROBERT JOHNS

Signature:  Date: 11-12-22

Address: 43732 35TH EAST
LANCASTER

City of Lancaster Proposed Eastside Overlay

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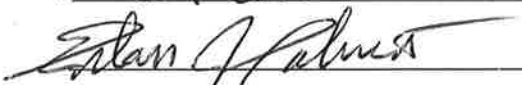
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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: ERLAN J. CALVERT
Signature:  Date: 12 NOV 22
Address: 43744 35TH ST. E
LANCASTER, CA. 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: SILVIA SHELMAN
Signature: Silvia Shelman Date: 11-12-22
Address: 43758 35th ST EAST
LANCASTER CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Arman Manukyan

Signature:  Date: _____

Address: 43831 40TH E ST LANCASTER
CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: MELVIN, ELISA VARGAS
Signature:  Date: 11/12/22
Address: 43759 40th St. E
LANCASTER, CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Sharon & Arden Hughes
Signature: Sharon Hughes Date: 11-12-22
Address: 44007 40th E 93535
Sharonmahn

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Rick & Linda Bishop

Signature:

Linda Bishop Date: 11/12/22

Address:

3530 E Ave 9-8
Lancaster, Cal 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Tony & DEBE FIMBRES

Signature:



Date:

11/21/22

Address:

3620 J-8

LANCASTER, CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: _____

Joseph E. Lewis

Signature: _____

J. E. Lewis

Date: _____

Address: _____

2100 E. AVE J-8

Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Lamy Hartanto
Signature: Lamy Hartanto Date: 11/14/22
Address: 3834 E-Ave. J-8
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

JORGE L TORRES

Signature:

Jorge L Torres

Date:

11-12-22

Address:

3734 E AVENUE J 8

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Rosa Maria Torres

Signature:

Rosa Maria Torres

Date: 11-12-22

Address:

37-34 E. Hill St

Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Alisa Chessani
Signature: Alisa Chessani Date: _____
Address: 3718 E Ave J8
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Paul Q Ward

Signature:

Paul Q Ward

Date: 11/12/2022

Address:

3535 E. Avenue K

LANCASTER, CA 93535

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Homeowner name: _____

Signature: _____

Address: _____

Olga Bucero
Olga Bucero Date: 11/12/22
43725 Deryn Ln Lancaster, CA 93536

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: MICHAEL & TRUMPY LOUEBALLY

Signature: 

Date: 11-12-2022

Address: 43806 DEUVIN LN.

LANCASTER, CA. 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Jon & Sandra Kredo
Signature: Sandra Kredo Date: 11-12-22
Address: 43626 Devyn Ln
Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

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Homeowner name: Roby Roach - Charlotte Roach

Signature: Roby Roach Charlotte Roach Date: Nov. 12, 2022

Address: 43627 Devon Ln.
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

1. Increased crime in our area
2. Increase in water demand to an already diminished water base
3. Increase in electrical demand to our already fragile California electrical grid
4. Increase in traffic at 40th Street East and Avenue K
5. The stench of cannabis being grown will be ever present in our neighborhood
6. The very real decrease in property values to homes in our neighborhood

There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Anthony and Lynda Stevens

Signature:

[Handwritten Signature]

Date:

11/12/22

Address:

43750 Deryn Lane
Lancaster Ca 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: James D Spriggs

Signature:  Date: 11-12-22

Address: 43724 Devyn Ln

Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Robert Stansbury

Signature:

[Handwritten Signature]

Date:

11.17.2021

Address:

513740 Damon Lane

Lancaster CA 92535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Heriberto Alonso

Signature:

[Handwritten Signature]

Date: 11-12-22

Address:

43708 Duyn Ln.

Lancaster, PA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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6. The very real decrease in property values to homes in our neighborhood

There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: MICHAEL SPRIGGS

Signature: Michael Spriggs

Date: 11-12-22

Address: 43724 DEVYN LN.

LANCASTER, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Mike and Heidi Haynes

Signature:

Heidi Haynes

Date:

11/12/2022

Address:

43611 Devyn Lane

Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: _____

Beatriz *Beatriz Dean*

Signature: _____

Beatriz

Date: _____

11/12/2022

Address: _____

43708 Deryn Ln
Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: _____

Signature: _____

Date: _____

Address: _____

Arigida Patricia Paster
43650 Dreyer Ln.
Lancaster, Ca
93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Andria Oesterle
Signature: Andria Oesterle Date: 11-11-23
Address: 43637 Devyn Lane
Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Jon and Kristine Sisson

Signature:

Kristine Sisson Date: 11/12/22

Address:

3807 Paula Ln.
Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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- Cannabis facilities

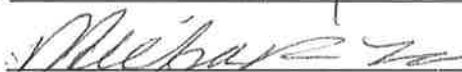
We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Michael & Monica Lee

Signature:  Date: 11-12-22

Address: 3761 Pauls Ln
Lancaster Ca. 93535



City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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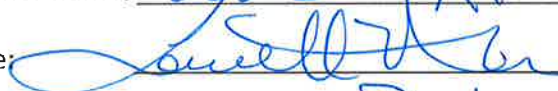
There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Lowell Allen

Signature:

 Date: 11/11/22

Address:

3709 Paula Ln.
LANCASTER, CA. 93543

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: RON CRATON

Signature: *Ron Craton* Date: 11-13-22

Address: 3831 Paula Lane
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Robert Medina

Signature: Robert Medina Date: 11/13/2022

Address: 37th Paula Lane

Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

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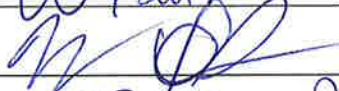
There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Wyatt E. Allen

Signature:



Date:

11-12-22

Address:

3709 Paula Ln,
Lancaster, CA, 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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- Cannabis facilities

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Roy and Carolyn Knox

Signature: Roy Knox Date: 11/12/22

Address: 43638 Ryckebosch Lane
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
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6. The very real decrease in property values to homes in our neighborhood

There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Seth Hanna

Signature: Seth Hanna Date: 10/12/22

Address: 43933 Ryckebosch Ln, 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: DONNA HARTER

Signature: Donna M. Harter Date: 11/12/2022

Address: 43848 RICKBOSCH LN
LANCASTER, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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- Cannabis facilities

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: _____

Signature: _____

Address: _____

Jay Shields
Date: 11-14-22
43871 Ryckebosch Ln
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. We believe the proposed cannabis facility will do harm to our neighborhood for the following reasons:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

HARRY & MILLICENT SCOTT

Signature:

Harry Scott & Millicent Scott

Address:

43624 RYCKEBOSCH LN 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Deanne Nuttall & Neal
Signature: Deanne Nuttall Date: Nov. 12, 2022
Address: 43439 Ryckebusch
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

JUSTIN EGAN

Signature:

[Handwritten Signature]

Date:

11/12/22

Address:

43710 Ryckebosch lane
Lancaster Ca 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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- Cannabis facilities

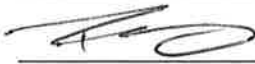
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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Robert Kerner

Signature:  Date: 11-12-22

Address: 43675 TWICKENBUSH LANE

LANCASTER, 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Nahum Gallames

Signature:

Nahum Gallames

Date:

11/12/2012

Address:

43662 Ryckebosch Ln.

Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Michael Fluharty

Signature:



Date:

11/12/22

Address:

43730 Rychembark Lane Ca
93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Gerald Wells

Signature: Gerald Wells Date: 11-12-22

Address: 43921 Rickobush Ln
Lancaster

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

M D Farmer

Signature:

M D Farmer

Date:

11/12/22

Address:

4380 Shiloh Lane

Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

- Rezoning from rural to light industrial starting at 40th St East
- Cannabis facilities

We believe the proposed rezoning and cannabis facility will do harm to our neighborhood as well as East Lancaster for the following reasons:

1. Increased crime in our area
2. Increase in water demand to an already diminished water base
3. Increase in electrical demand to our already fragile California electrical grid
4. Increase in traffic at 40th Street East and Avenue K
5. The stench of cannabis being grown will be ever present in our neighborhood
6. The very real decrease in property values to homes in our neighborhood

There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Katharine E. Yablonski
Signature: Katharine E. Yablonski Date: 11/13/22
Address: 43710 Shiloh Lane
Lancaster, Ca. 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: PETER M. YABLONSKI

Signature: 

Date: NOV 13, 2022

Address: 43710 SHILOH LANE

LANCASTER, CA. 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Signature:

Address:

Jamiea J. [Signature]
Jamiea J. [Signature] Date: 10-
43922 Shiloh

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

TERRY MURRAY

Signature:

Terry Murray

Date:

11-12-22

Address:

43944 Shiloh Ln

Lancaster, CA

93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Alma Soravia

Signature:  Date: 11-12-2022

Address: 43721 Sheloh Ln
Lancaster, Ca 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Erika Salmeron

Signature:



Date:

11-12-2022

Address:

43721 Shiloh Ln

Lancaster, Ca 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Jesus Lopez C

Signature:

Jesus Lopez C

Date:

11/12/22

Address:

43721 SHILOH Ln

Lancaster cal 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: WAYNE KALLIOMAA

Signature:  Date: Nov 12, 2022

Address: 43833 Shiloh lane

LANCASTER CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Adam Pawelek

Signature:

Adam Pawelek

Date:

12 Nov 2022

Address:

43921 Shiloh Lane

Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Ian Cunliffe
Signature: [Signature] Date: Nov. 12. 22
Address: 43821 Shuloh Lane
LANCASTER, 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

We the residents of Rancho Tierra Del Sol are against the City of Lancaster's Eastside Overlay plan. This project consists of two components:

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: HKKOP T.

Signature: _____ Date: 11/12/22

Address: 43809 SHELTON LANE

City of Lancaster Proposed Eastside Overlay

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Arcadia Venegas

Signature:

[Handwritten Signature]

Date:

11/12/22

Address:

43731 Sheldin Ln.

Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Raymond A. Cabeno

Signature:

[Handwritten Signature]

Date:

11-12-2022

Address:

43806 SHILOH LANE

LANC. CA 93535

City of Lancaster Proposed Eastside Overlay

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Sam Kim

Signature:  Date: 11/12/22

Address: 43821 Victor Pl
Lancaster CA 93535

City of Lancaster Proposed Eastside Overlay

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name:

Michael & Michael & Aida R. Michael

Signature:

[Handwritten Signature] Date: 11/12/22

Address:

43810 Victor Place
Lancaster, CA 93535

City of Lancaster Proposed Eastside Overlay

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: THOMAS GARDNER
Signature:  Date: 11/12/22
Address: 43866 VICTOR PL
LANCASTER, CA 93535

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: _____

Signature: _____

Address: _____

Shahn Langley

Ashley Langley

Ashley Langley

43624 Victor Pl.

Lancaster, CA 93535

Date: _____

11/12/22

City of Lancaster Proposed Eastside Overlay

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: MANFRED A GORKIE
Signature: Manfred A Gorkie Date: 11-12-22
Address: 43803 VICTOR PL
LANCASTER CA

City of Lancaster Proposed Eastside Overlay

Ms. Campana,

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There are many more ways we will be negatively impacted by building the proposed cannabis facility so close to our homes.

We do not believe this facility will positively impact the Rancho Tierra Del Sol neighborhood in a positive manner, nor the city of Lancaster.

Homeowner name: Joseph Thomas

Signature:  Date: _____

Address: 3753 E AVE E SPC 58

Lancaster, CA 93535



11.2 Biological Report/ Jurisdictional Delineation

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.

June 7, 2022

JN 188955

CITY OF LANCASTER

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

SUBJECT: Results of a Biological Resources Due Diligence Assessment for the Lancaster East Side Project – Light Industrial Overlay Zone – City of Lancaster, County of Los Angeles, California

Dear Ms. Campana:

Michael Baker International (Michael Baker) has prepared this report to document the results of a biological resources assessment for the Lancaster East Side Project – Light Industrial Overlay Zone (project or project site) located in the City of Lancaster, County of Los Angeles, California. Michael Baker conducted a thorough literature review to assess the potential for special-status plant and wildlife species¹ that have been documented or that are likely to occur on or within the immediate vicinity of the project site. No field surveys were conducted in support of this specific effort. Specifically, this report provides an assessment of the known occurrences of the special-status plant and wildlife species that were identified in the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database RareFind 5 (CNDDDB; CDFW 2022a), the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CIRP; CNPS 2022), the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation Project Planning Tool (IPaC; USFWS 2022a), and other databases as potentially occurring in the vicinity of the project site.

Project Location

The project site is generally located north of State Route 138 (SR-138), east of SR-14, south of SR-58, and west of SR-395 in the City of Lancaster, County of Los Angeles, California (refer to Figure 1, *Regional Vicinity*). The project site is depicted in Sections 21, 22, 23, 24, 25, 26, 27, and 28 of Township 7 North, Range 11 West, on the U.S. Geological Survey's (USGS) *Lancaster East, California* 7.5-minute quadrangle; and Sections 24 and 25 of Township 7 North, Range 11 West and Sections 19, 20, 21, 28, 29,

¹ As used in this report, "special-status" refers to plant and wildlife species that are federally/State listed, proposed, or candidates; plant species that have been designated a California Rare Plant Rank species by the California Native Plant Society; wildlife species that are designated by the California Department of Fish and Wildlife as Fully Protected, Species of Special Concern, or Watch List species; State/locally rare vegetation communities; and species that warrant protection under local or regional preservation policies.

and 30 of Township 7 North, Range 10 West on the USGS *Alpine Butte, California* 7.5-minute quadrangle (refer to Figure 2, *Project Vicinity*). Specifically, the project site is located north of East Avenue L, east of 40th Street East, south of East Lancaster Boulevard, and west of 110th Street East in the City of Lancaster and totals 5,841 acres (refer to Figure 3, *Project Site*).

Methodology

Literature Review

Michael Baker conducted thorough literature reviews and records searches to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. Previous special-status plant and wildlife species occurrence records within the USGS *Lancaster East, Alpine Butte, Rosamond, Rosamond Lake, Redman, Rogers Lake South, Hi Vista, Lovejoy Buttes, Littlerock, Palmdale, Ritter Ridge, and Lancaster West, California* 7.5-minute quadrangles were researched through a query of the CNDDDB (CDFW 2022a) and CIRP (CNPS 2022), and for the project region through a review of the IPaC (USFWS 2022a).

The current regulatory/conservation status of special-status plant and wildlife species was verified through lists and resources provided by the CDFW, specifically the *Special Animals List* (CDFW 2022b), *Special Vascular Plants, Bryophytes, and Lichens List* (CDFW 2022c), *State and Federally Listed Endangered and Threatened Animals of California* (CDFW 2022d), and *State and Federally Listed Endangered, Threatened, and Rare Plants of California* (CDFW 2022e). USFWS-designated Critical Habitat for species listed under federal Endangered Species Act (FESA) was reviewed online via the Environmental Conservation Online System: Threatened and Endangered Species Active Critical Habitat Report (USFWS 2022b). In addition, Michael Baker reviewed previously prepared reports, survey results, and literature, as available, detailing the biological resources previously observed on or within the vicinity of the project site to understand existing site conditions, confirm previous species observations, and note the extent of any disturbances, if present, that have occurred within the project site that would otherwise limit the distribution of special-status biological resources. Standard field guides and texts were reviewed for specific habitat requirements of special-status species, as well as the following resources for species information, previous data, and general context:

- *Biological Constraints Analysis for the Green Beanworks B Solar Project, City of Lancaster, Los Angeles County, California* (SWCA Environmental Consultants [SWCA] 2017)
- *Biological Resource Assessment of APN 3386-007-035* (Hagan 2017)
- *Biological Resource Assessment of APN 3386-007-007, Lancaster, California* (Hagan 2020)
- *Lancaster East Side Project – Cannabis Facility Project Biological Resources Assessment* (Michael Baker 2022)
- *Custom Soil Resource Report for Antelope Valley Area, California* (U.S. Department of Agriculture [USDA] 2022)
- National Wetlands Inventory (NWI) Mapper (USFWS 2022c)

-
- Google Earth Pro Historical Aerial Imagery from 1985 to 2018 (Google, Inc. 2022)
 - *City of Lancaster General Plan 2030* (City of Lancaster 2009)
 - Calflora Database (Calflora 2022)
 - Species Accounts provided by Birds of the World (Billerman et. al 2020)
 - Cornell Lab of Ornithology’s eBird Database (eBird 2022)

Biological Field Survey/Habitat Assessment

A field survey was not conducted specifically for the Light Industrial Overlay Zone project. However, a field survey was conducted by Michael Baker biologists Lauren Mapes, Tom Millington, and Ryan Winkleman on April 13th, 2022, to document existing conditions and assess the potential for special-status biological resources to occur within the boundaries of the proposed Lancaster East Side Project – Cannabis Facility Project (cannabis facility) in the southwest corner of the project site bounded generally by East Avenue K to the north, 50th Street East to the east, East Avenue L to the south, and 40th Street East to the west. Although special-status species observations from this April 2022 survey are incorporated into this report, vegetation mapping is not incorporated as the cannabis facility site is only located on a small and discrete portion of the overall Light Industrial Overlay Zone project site. For a description of field survey methodology during the April 2022 field survey of the cannabis facility site, refer to Michael Baker 2022.

Summary of Regulations

This section discusses relevant laws, policies, and ordinances that may pose constraints to any future development within the project site on a holistic level. It should be noted that this section is not intended to be exhaustive and that additional policies may apply for proposed developments within the project site.

Federal

Federal Endangered Species Act of 1973

As defined within the FESA, an endangered species is any animal or plant listed by regulation as being in danger of extinction throughout all or a significant portion of its geographical range. A threatened species is any animal or plant that is likely to become endangered within the foreseeable future throughout all or a significant portion of its geographical range. Without a special permit, federal law prohibits the “take” of any individuals or habitat of federally listed species. Under Section 9 of the FESA, take is defined as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct.” The term “harm” has been clarified to include “any act which actually kills or injures fish or wildlife and emphasizes that such acts may include significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife.” Enforcement of FESA is administered by the USFWS.

Under the definition used by the FESA, “Critical Habitat” refers to specific areas within the geographical range of a species that were occupied at the time it was listed that contain the physical or biological features

that are essential to the survival and eventual recovery of that species and that may require special management considerations or protection, regardless of whether the species is still extant in the area. Areas that were not known to be occupied at the time a species was listed can also be designated as Critical Habitat if they contain one or more of the physical or biological features that are essential to that species' conservation and if the occupied areas are inadequate to ensure the species' recovery. If a project may result in take or adverse modification to a species' designated Critical Habitat and the project has a federal nexus, the project proponent may be required to provide suitable mitigation. Projects with a federal nexus may include projects that occur on federal lands, require federal permits (e.g., federal Clean Water Act [CWA] Section 404 permit), or receive any federal oversight or funding. If there is a federal nexus, then the federal agency that is responsible for providing funds or permits would be required to consult with the USFWS under the FESA.

Whenever federal agencies authorize, fund, or carry out actions that may adversely modify or destroy Critical Habitat, they must consult with USFWS under Section 7 of the FESA. The designation of Critical Habitat does not affect private landowners, unless a project they are proposing uses federal funds, or requires federal authorization or permits (i.e., funding from the federal Highway Administration or a permit from the U.S. Army Corps of Engineers [USACE]).

Migratory Bird Treaty Act

Pursuant to the federal Migratory Bird Treaty Act (MBTA) (16 U.S. Government Code [USC] 703) of 1918, as amended in 1972, federal law prohibits the taking of migratory birds or their nests or eggs (16 USC 703; 50 CFR 10, 21). The statute states:

“Unless and except as permitted by regulations made as hereinafter provided in this subchapter, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill...any migratory bird, any part, nest, or egg of any such bird...included in the terms of the [Migratory Bird] conventions...”

The MBTA covers the taking of any nests or eggs of migratory birds, except as allowed by permit pursuant to 50 CFR, Part 21. Disturbances causing nest abandonment and/or loss of reproductive effort (i.e., killing or abandonment of eggs or young) may also be considered a “take.” This regulation seeks to protect migratory birds and active nests.

In 1972, the MBTA was amended to include protection for migratory birds of prey (e.g., raptors). Six families of raptors occurring in North America were included in the amendment: Accipitridae (kites, hawks, and eagles); Cathartidae (New World vultures); Falconidae (falcons and caracaras); Pandionidae (ospreys); Strigidae (typical owls); and Tytonidae (barn owls). The provisions of the 1972 amendment to the MBTA protects all species and subspecies of the families listed above. The MBTA protects over 800 species including geese, ducks, shorebirds, raptors, songbirds and many relatively common species.

Clean Water Act

Since 1972, the USACE and U.S. Environmental Protection Agency (EPA) jointly regulate discharges of dredged or fill material into “waters of the U.S.” (WoUS), including wetland and non-wetland aquatic features, pursuant to Section 404 of the CWA. Section 404 is founded on the findings of a significant nexus (or connection) between the aquatic or other hydrological features in question and interstate commerce via Relatively Permanent Waters (RPW), and ultimately Traditional Navigable Waters (TNW), through direct or indirect connection as defined by USACE regulations. However, the limits to which this is applied have changed over time as discussed below.

SWANCC and Rapanos. In 1984, the Migratory Bird Rule enabled the USACE to expand jurisdiction over isolated waters, and in 1985, the U.S. Supreme Court upheld the inclusion of adjacent wetlands in the regulatory definition of WoUS. However, in 2001, the USACE’s jurisdiction was narrowly limited following the Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers (SWANCC) in which the U.S. Supreme Court held that the use of “isolated” non-navigable intrastate ponds by migratory birds was not, by itself, sufficient basis for the exercise of federal regulatory authority under the CWA. In 2006, a majority of the U.S. Supreme Court overturned two Sixth Circuit Court of Appeals decisions in the consolidated cases of Rapanos v. United States and Carabell v. United States (collectively referred to as Rapanos), concluding that wetlands isolated by surface connection are WoUS nonetheless if they significantly affect the chemical, physical, and biological integrity of other covered waters (significant nexus). The Navigable Waters Protection Rule (NWPR) eliminated the case specific application of the significant nexus test articulated in the Rapanos decision.

2015 Clean Water Rule. In 2015, the USACE and EPA published the “Clean Water Rule” clarifying the scope of coverage of the CWA. Upon issuance however, numerous lawsuits were filed and consolidated in the Sixth Circuit, immediately putting a “stay” on its implementation. In January 2018, the U.S. Supreme Court ruled that the Sixth Circuit did not have jurisdiction over the case, and in February 2018, dismissed it and dissolved the stay. In August 2018, a federal judge found that the suspension failed to give an adequate public notice and therefore violated the Administrative Procedure Act. The 2015 Clean Water Rule remained in effect in 22 states, including California, the District of Columbia, and the U.S. territories until December 23, 2019.

Repeal of 2015 Clean Water Rule. On October 22, 2019, the EPA and the USACE published a final rule to repeal the 2015 Clean Water Rule and restore the regulatory methodology that existed prior to the 2015 Rule. Under this rule, which became effective on December 23, 2019, jurisdictional WoUS were defined by the 1986/1988 regulatory definition of WoUS under CWA regulations 40 CFR 230.3(s).

Navigable Waters Protection Rule. On January 23, 2020, the EPA and the USACE finalized the NWPR to define WoUS. On April 21, 2020, the EPA and the USACE published the NWPR in the Federal Register. On June 22, 2020, 60 days after publication in the Federal Register, the NWPR became effective across the nation including the state of California.

Remand And Vacatur of the Navigable Waters Protection Rule. On August 30, 2021, the NWPR was remanded and immediately vacated by the United States District Court For The District Of Arizona. In light of this order, the EPA and the USACE halted implementation of the NWPR nationwide and reinstated the pre-2015 definition of WoUS. Under the pre-2015 definition of the WoUS, the USACE and EPA require the case specific application of the significant nexus test, as articulated in the Rapanos decision, to determine WoUS.

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) provides for the protection of the environment within the State of California by establishing State policy to prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures for projects. It applies to actions directly undertaken, financed, or permitted by State lead agencies. If a project is determined to be subject to CEQA, the lead agency will be required to conduct an Initial Study (IS); if the IS determines that the project may have significant impacts on the environment, the lead agency will subsequently be required to write an Environmental Impact Report (EIR). A finding of non-significant effects will require either a Negative Declaration or a Mitigated Negative Declaration instead of an EIR. Section 15380 of the CEQA Guidelines independently defines “endangered” species as those whose survival and reproduction in the wild are in immediate jeopardy, while “rare” species are defined as those who are in such low numbers that they could become endangered if their environment worsens.

California Endangered Species Act

In addition to federal laws, the State of California has its own California Endangered Species Act (CESA), enforced by the CDFW. The CESA program maintains a separate listing of species beyond the FESA, although the provisions of each act are similar.

State-listed threatened and endangered species are protected under provisions of the CESA. Activities that may result in “take” of individuals (defined in CESA as; “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) are regulated by CDFW. Habitat degradation or modification is not included in the definition of “take” under CESA. Nonetheless, CDFW has interpreted “take” to include the destruction of nesting, denning, or foraging habitat necessary to maintain a viable breeding population of protected species.

The State of California considers an endangered species as one whose prospects of survival and reproduction are in immediate jeopardy. A threatened species is considered as one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management. A candidate species is one that potentially qualifies for listing under CESA, pending a formal review and assessment of available data; these species are afforded all of the same legal protections as if they were already listed. A rare species is one that is considered present in

such small numbers throughout its range that it may become endangered if its present environment worsens. State threatened, endangered, and candidate species are fully protected against take, as defined above.

The CDFW has also produced a species of special concern list to serve as a species watch list. Species on this list are either of limited distribution or their habitats have been reduced substantially, such that a threat to their populations may be imminent. Species of special concern may receive special attention during environmental review, but they do not have formal statutory protection. At the federal level, USFWS also uses the label “species of concern” as an informal term that refers to species which might be in need of concentrated conservation actions.

As the species of concern designated by USFWS do not receive formal legal protection, the use of the term does not necessarily ensure that the species will be proposed for listing as a threatened or endangered species.

California Fish and Game Code

Sections 3503, 3503.5, 3511, and 3513. The CDFW administers the California Fish and Game Code (CFGC). There are particular sections of the CFGC that are applicable to natural resource management. For example, Section 3503 makes it unlawful to destroy any birds’ nest or any birds’ eggs that are protected under the MBTA. Further, any birds in the orders Falconiformes or Strigiformes (Birds of Prey), such as hawks, eagles, and owls, are protected under Section 3503.5 which makes it unlawful to take, possess, or destroy their nest or eggs. A consultation with CDFW may be required prior to the removal of any bird of prey nest that may occur on a project site. Section 3511 lists fully protected bird species, where the CDFW is unable to authorize the issuance of permits or licenses to take these species. Pertinent species that are State fully protected include golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*). In addition, Section 3513 makes it unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Sections 1600 et seq. Sections 1600 et seq. of the CFGC establishes a fee-based process to ensure that projects conducted in and around lakes, rivers, or streams do not adversely affect fish and wildlife resources, or when adverse impacts cannot be avoided, ensures that adequate mitigation and/or compensation is provided.

Section 1602 of the CFGC requires any person, State, or local governmental agency or public utility to notify CDFW before beginning any activity that will do one or more of the following:

- (1) substantially obstruct or divert the natural flow of a river, stream, or lake;
- (2) substantially change or use any material from the bed, channel, or bank of a river, stream, or lake;
- or
- (3) deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can pass into a river, stream, or lake.

This applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the State, including the maintenance of existing drain culverts, outfalls, and other structures. To avoid the need for a Lake or Streambed Alteration Agreement (LSAA) from CDFW, all proposed impacts should remain outside of the top of active banks and the canopy/dripline of any associated riparian vegetation, whichever is greater.

Native Plant Protection Act

Sections 1900–1913 of the CFGC were developed to preserve, protect, and enhance Rare and Endangered plants in the State of California. The act requires all State agencies to use their authority to carry out programs to conserve Endangered and Rare native plants. Provisions of the Native Plant Protection Act prohibit the taking of listed plants from the wild and require notification of the CDFW at least ten days in advance of any change in land use which would adversely impact listed plants. This allows the CDFW to salvage listed plant species that would otherwise be destroyed.

Porter-Cologne Act

Applicants for a federal license or permit for activities that may discharge to WoUS must seek a Water Quality Certification (WQC) from the State or Indian tribe with jurisdiction². In California, there are nine (9) Regional Water Quality Control Boards (RWQCB) that issue or deny Certification for discharges within their geographical jurisdiction. Such Certification is based on a finding that the discharge will meet water quality standards, which are defined as numeric and narrative objectives in each RWQCB’s Basin Plan, and other applicable requirements. The State Water Resources Control Board has this responsibility for projects affecting waters within multiple RWQCBs. The RWQCB’s jurisdiction extends to all WoUS, including wetlands, and to waters of the State (described below).

The Porter-Cologne Act gives the State very broad authority to regulate waters of the State, which are defined as any surface water or groundwater, including saline waters. The Porter-Cologne Act has become an important tool for the regulatory environment following the SWANCC³ and Rapanos⁴ court cases, with respect to the state’s authority over isolated and otherwise insignificant waters. Generally, in the event that there is no nexus to a TNW, any person proposing to discharge waste into waters of the State that could affect its water quality must file a Report of Waste Discharge. Although “waste” is partially defined as any waste substance associated with human habitation, the RWQCB also interprets this to include fill discharged into water bodies.

On April 2, 2019, the State Water Resources Control Board adopted a State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (Procedures), for inclusion in the forthcoming Water Quality Control Plan for Inland Surface Waters and Enclosed Bays and Estuaries and Ocean Waters of California. The Procedures consist of four major elements: 1) a wetland definition; 2) a framework for determining if a feature that meets the wetland definition is a water of the state; 3) wetland delineation procedures; and 4) procedures for the submittal, review, and approval of applications

2 Title 33, United States Code, Section 1341; Clean Water Act Section.

3 *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers*, 531 U.S. 159 (2001).

4 *Rapanos v. United States*, 547 U.S. 715 (2006).

for WQCs and Waste Discharge Requirements (WDRs) for dredge or fill activities. The Procedures were approved by the Office of Administrative Law on August 28, 2019 and became effective May 28, 2020.

Local Policies and Ordinances

City of Lancaster Municipal Code

Chapter 15.66, *Biological Impact Fee*, of the *Lancaster Municipal Code* (Municipal Code) establishes a biological impact fee to mitigate long-term incremental impacts of new development on biological resources on a regional basis. The fee is based upon expected regional effects from new development and fees necessary to contribute to the City of Lancaster’s “fair share” to mitigate impacts on a regional basis. The fee applies to all new development on vacant land which has not been previously developed. This includes land subdivisions, new development approvals, and requests for extension. The current Biological Impact Fee as of April 23, 2021 is \$770 per acre of new development on vacant land.⁵ Future development projects within the project site are expected to be subject to the biological impact fee established in Chapter 15.66 of the Municipal Code.

Los Angeles County’s Significant Ecological Area Program

The County of Los Angeles has identified Significant Ecological Areas (SEA) as lands that contain irreplaceable biological resources. These areas support sustainable populations of their component species and include undisturbed or lightly disturbed habitats that support valuable and threatened species, as well as linkages and corridors that promote species movement. SEAs are not considered wilderness preserves, but instead much of the land is privately held or used for public recreation. The SEA program is intended to ensure that privately held lands within the SEAs keep the right of reasonable use, while avoiding activities and development that are incompatible with the long-term survival of the SEAs. Cumulatively, twenty-one (21) SEAs have been identified within Los Angeles County.

Los Angeles County Code

Los Angeles County Code Chapter 22.102, *Hillside Management and Significant Ecological Areas*, establishes development guidelines and required permits for development in or near SEAs.

Existing Site Conditions

The project site is flat with an approximate elevation range of 2,427 to 2,457 feet above mean sea level. According to the *Custom Soil Resource Report for Antelope Valley Area, California* (USDA 2022), the project site is underlain by the following soil units (refer to Figure 4, *USDA Soils*):

- Cajon loamy sand, 0 to 2 percent slopes (CaA)
- Cajon loamy sand, 2 to 9 percent slopes (CaC)
- Cajon loamy sand, loamy substratum, 0 to 2 percent slopes (CbA)

⁵ City of Lancaster Fee Schedule: <https://www.cityoflancasterca.org/home/showpublisheddocument/43416/637686855310168407>

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- Cajon loamy fine sand, 0 to 2 percent slopes, hummocky (CcA2)
 - Dune land (DuD)
 - Hesperia loamy fine sand, 0 to 2 percent slopes (HgA)
 - Hesperia loamy fine sand, 0 to 2 percent slopes, hummocky (HgA2)
 - Hesperia fine sandy loam, 0 to 2 percent slope (HkA)
 - Riverwash (Rg)
 - Rosamond loamy fine sand (Rm)
 - Rosamond loamy fine sand, hummocky (Rm2)
 - Rosamond fine sandy loam (Ro)
 - Rosamond loam (Rp)
 - Rosamond loam, saline-alkali (Rr)
 - Rosamond silty clay loam (Rt)

Based on a review of historic aerial imagery, most of the project site has remained undeveloped since at least the 1980s (Google, Inc. 2022). The undeveloped portions of the project site can be divided into areas that are relatively undisturbed and contain native vegetation, and areas that are generally used for agricultural purposes. Outside of the project site there is additional agricultural land and some residential land uses.

Vegetation Communities and Land Cover Types

A field survey of the entire project site was not conducted as part of this effort and thus, specific vegetation mapping is not available. However, vegetation mapping in the City of Lancaster General Plan 2030 indicates that the project site is a mixture of desert wash, desert woodland, ruderal areas, agricultural land, and developed areas (City of Lancaster 2009). Contemporary field surveys with vegetation mapping conforming to *A Manual of California Vegetation* (Sawyer et al. 2009) would be required in order to remap on-site vegetation with current accepted protocols that are adequate to determine potential mitigation requirements.

Wildlife

Natural vegetation communities provide foraging habitat, nesting/denning sites, and shelter from adverse weather or predation. This section provides a general discussion of common wildlife species that are known to have been detected on-site by Michael Baker or other biologists based on published biological reports, or that are expected to occur based on existing site conditions.

Fish

No fish or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would support populations of fish are known to occur within the project site. Although Little Rock Wash is present within the project site, it is not a perennial feature and is not expected under normal conditions to have any fish or aquatic life. Therefore, no fish are expected to occur.

Amphibians

No amphibians or hydrogeomorphic features (e.g., perennial creeks, ponds, lakes, reservoirs) that would provide suitable breeding habitat for amphibians are known to occur within the project site. Although Little Rock Wash is present within the project site, it is not a perennial feature and within the project site is not expected under normal conditions to have any amphibians or aquatic life. Therefore, no amphibians are expected to occur.

Reptiles

No reptile species have been observed in the project site during the project-specific field surveys that have occurred in the past (SWCA 2017, Hagan 2017, Hagan 2020, Michael Baker 2022). However, the project site is expected to provide habitat for reptilian species that are acclimated to edge or urban environments. Common reptilian species that may be present within the project site include western side-blotched lizard (*Uta stansburiana elegans*), Great Basin whiptail (*Aspidoscelis tigris tigris*), red racer (*Coluber flagellum piceus*), northern Mohave rattlesnake (*Crotalus scutulatus scutulatus*), and Mohave desert sidewinder (*Crotalus cerastes cerastes*).

Birds

Some of the avian species that have been detected within the project site during various previous field surveys include mourning dove (*Zenaida macroura*), rock pigeon (*Columba livia*), Eurasian collared-dove (*Streptopelia decaocto*), red-tailed hawk (*Buteo jamaicensis*), Swainson's hawk (*Buteo swainsoni*, a State Threatened [ST] species), great horned owl (*Bubo virginianus*), common raven (*Corvus corax*), California quail (*Callipepla californica*), northern mockingbird (*Mimus polyglottos*), California horned lark (*Eremophila alpestris actia*; a State Watch List [WL] species), yellow-headed blackbird (*Xanthocephalus xanthocephalus*, a State Species of Special Concern [SSC]), house finch (*Haemorrhous mexicanus*), and white-crowned sparrow (*Zonotrichia leucophrys*) (SWCA 2017, Hagan 2017, Hagan 2020, Michael Baker 2022). A potentially large variety of avian species could occur on-site, including both year-round residents, seasonal residents, and transient migrants, but this is largely determined by on-site habitat. Examples of other avian species that may occur within the project site include killdeer (*Charadrius vociferus*), American kestrel (*Falco sparverius*), Say's phoebe (*Sayornis saya*), American pipit (*Anthus rubescens*), long-billed curlew (*Numenius americanus*), mountain bluebird (*Sialia currucoides*), European starling (*Sturnus vulgaris*), savannah sparrow (*Passerculus sandwichensis*), western meadowlark (*Sturnella neglecta*), and Brewer's blackbird (*Euphagus cyanocephalus*).

Nesting birds are protected pursuant to the MBTA and the CFGC⁶. To maintain compliance with the MBTA and CFGC, clearance surveys are typically required prior to any ground disturbance or vegetation removal

⁶ Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the California Fish and Game Code or any regulation made pursuant thereto; Section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey); and Section 3513 makes it unlawful to take or possess any migratory non-game bird except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act, as amended (16 U.S.C. § 703 *et seq.*).

activities to avoid direct or indirect impacts to active bird nests and/or nesting birds. Consequently, if an active bird nest is destroyed or if project activities result in indirect impacts (e.g., nest abandonment, loss of reproductive effort) to nesting birds, it is considered “take” and is potentially punishable by fines and/or imprisonment. Although the project site provides suitable nesting habitat for various year-round and seasonal bird species, no active nests or birds displaying overt nesting behavior were observed during the field survey.

Mammals

The project site provides marginal habitat for a limited number of mammalian species adapted to living in edge or urban environments. Some of the mammalian species detected within the project site during previous surveys include California ground squirrel (*Otospermophilus beecheyi*), white-tailed antelope ground squirrel (*Ammospermophilus leucurus*), desert cottontail (*Sylvilagus audubonii*), and black-tailed jackrabbit (*Lepus californicus*) (SWCA 2017, Hagan 2017, Hagan 2020, Michael Baker 2022). Other common mammalian species that may occur within the project site include opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), domestic dog (*Canis lupus familiaris*), and coyote (*Canis latrans*). Bats occur throughout most of California. Bats may forage throughout much of the project site, especially if there are areas where insects accumulate (e.g. over agricultural fields). There may also be roosting habitat in the project site if there are any hollow tree trunks/limbs, trees with particularly dense foliage, bridges, or abandoned buildings).

Migratory Corridors and Linkages

Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

The project site is mostly undeveloped and is located along the eastern edge of the City of Lancaster, where generally less development is present in the surrounding areas. The most obvious natural corridor within the project site is Little Rock Wash, which crosses from south to north in the western half of the project site, originating in the San Gabriel Mountains as Little Rock Creek and terminating approximately two miles north of the project site. Little Rock Wash is not recognized as a corridor by the City of Lancaster General Plan (City of Lancaster 2009) or the *South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion* (South Coast Wildlands 2008). However, Little Rock Wash is recognized by Los Angeles County as part of the Antelope Valley SEA, which provides dispersal and migration opportunities between the San Gabriel Mountains and the playa lakes on Edwards Air Force Base. Other potential migratory pathways would generally be opportunistic across open space areas between agricultural fields, or possibly even through agricultural fields but generally would likely reduced by the presence of surrounding roadways and existing agricultural, commercial, and residential developments within the

project site. These developments have fragmented the connection between the project site and surrounding naturally occurring vegetation communities. Elevated noise levels, vehicle roadway/traffic, lighting, and presence of humans and domestic pets are also expected to further decrease the suitability of the project site to be used as a wildlife movement corridor or linkage.

State and Federal Jurisdictional Resources

There are three agencies that regulate activities within inland streams, wetlands, and riparian areas in California. The USACE Regulatory Branch regulates discharge of dredged or fill material into WoUS pursuant to Section 404 of the CWA and Section 10 of the Rivers and Harbors Act. Of the State agencies, the RWQCB regulates discharges to surface waters pursuant to Section 401 of the CWA and Section 13263 of the California Porter-Cologne Water Quality Control Act, and the CDFW regulates alterations to streambed and associated vegetation communities under Section 1600 *et seq.* of the CFGC.

According to the NWI Mapper, numerous potentially jurisdictional features may be located within the project site (USFWS 2022c). Little Rock Wash in particular is the most prominent potentially jurisdictional feature within the project site, and may qualify as a WoUS and/or water of the State regulated by the USACE, RWQCB, and/or CDFW. As a result, prior to any development occurring within the project site it is recommended that a jurisdictional delineation be conducted to document the presence or absence of potentially jurisdictional features and the potential requirement of permits under the USACE, RWQCB, and/or CDFW.

Special-Status Biological Resources

The CNDDDB (CDFW 2022a), CIRP (CNPS 2022), and IPaC (USFWS 2022a) were queried for reported locations of special-status plant and wildlife species as well as special-status natural vegetation communities in the USGS *Lancaster East, Alpine Butte, Rosamond, Rosamond Lake, Redman, Rogers Lake South, Hi Vista, Lovejoy Buttes, Littlerock, Palmdale, Ritter Ridge, and Lancaster West, California 7.5-minute quadrangles* and project region. Twenty-three (23) special-status plant species and thirty (30) special-status wildlife species were identified during the records search. No special-status vegetation communities were identified. The potential for these species to occur within the project site generally cannot be determined without a recent biological survey of the area, and the only recent survey that has been conducted was Michael Baker's survey of the cannabis facility site in April 2022. As a result, this section provides only a preliminary discussion of those special-status species that have been recorded within or adjacent to the project site in the past, but a more detailed discussion of the potential for additional special-status species to occur would require a contemporary field survey(s) across the entire project site to properly characterize on-site habitat. This information provided below is based primarily on the CNDDDB (CDFW 2022a), the Calflora database (Calflora 2022), the eBird database (eBird 2022), and the aforementioned previous biological survey reports (SWCA 2017, Hagan 2017, Hagan 2020, Michael Baker 2022). A depiction of known special-status species occurrences is shown in Figure 5, *Special-Status Species Occurrences*. Because the eBird database does not typically provide specific locations of records unless

provided by the original observer, Figure 5 only includes special-status species recorded in the CNDDDB and occurrences from Michael Baker’s April 2022 field survey of the cannabis facility site.

Special-Status Plants

A total of twenty-three (23) special-status plant species have been recorded in the USGS *Lancaster East, Alpine Butte, Rosamond, Rosamond Lake, Redman, Rogers Lake South, Hi Vista, Lovejoy Buttes, Littlerock, Palmdale, Ritter Ridge, and Lancaster West, California* 7.5-minute quadrangles by the CNDDDB and CIRP (refer to Attachment B). Based on available data, the only special-status plant species that has been identified within the project site is western Joshua tree (*Yucca brevifolia brevifolia*; a State Candidate [SC] species for listing). This species is known to occur in scattered locations within the project site. No other special-status plant species are known to occur within the project site. Most of the special-status plant records within the search radius are located more than five miles away from the project site and because of the distance, habitat fragmentation, and general habitat conditions of the project site (i.e. much of the project site is either being used for agriculture or is already developed), are less likely to occur within the project site. According to data available in the CNDDDB (CDFW 2022a) and the Calflora database (Calflora 2022), the closest known occurrence of a special-status plant species other than Joshua tree to the project site is approximately 2.2 miles to the northwest, a 2005 record of alkali mariposa lily (*Calochortus striatus*; California Rare Plant Rank [CRPR] 1B.2). Although the full records search results are included in Attachment B, based on the CNDDDB (CDFW 2022a) and the Calflora database (Calflora 2022), other special-status plant species that have been recorded within 5 miles of the project site and thus may be more likely to occur include Mojave spineflower (*Chorizanthe spinosa*; CRPR 4.2), sagebrush loeflingia (*Loeflingia squarrosa* var. *artemisiaru*; CRPR 2B.2), crowned muilla (*Muilla coronata*; CRPR 4.2) Lancaster milk-vetch (*Astragalus preussii* var. *laxiflorus*; CRPR 1B.1), white pygmy-poppy (*Canbya candida*; CRPR 4.2), Mojave Indian paintbrush (*Castilleja plagiotoma*; CRPR 4.3), Parry’s spineflower (*Chorizanthe parryi* var. *parryi*; CRPR 1B.1), Rosamond eriastrum (*Eriastrum rosamondense*; CRPR 1B.1), and golden goodmania (*Goodmania luteola*; CRPR 4.2). It should be noted that known records of the last six species were all recorded closer to five miles from the project site, most of the records are over 40 years old (some over 100 years old), and some of these may now be extirpated due to the development of the surrounding region.

Special-Status Wildlife

A total of thirty (30) special-status wildlife species have been recorded in the USGS *Lancaster East, Alpine Butte, Rosamond, Rosamond Lake, Redman, Rogers Lake South, Hi Vista, Lovejoy Buttes, Littlerock, Palmdale, Ritter Ridge, and Lancaster West, California* 7.5-minute quadrangles by the CNDDDB and project region by the IPaC (refer to Attachment B). The special-status species Swainson’s hawk (a ST species), California horned lark (a State WL species), loggerhead shrike (*Lanius ludovicianus*; a State SSC) and yellow-headed blackbird (a State SSC) were all observed during Michael Baker’s April 2022 field survey of the cannabis facility site in the southwest corner of the project site. According to records within the CNDDDB (CDFW 2022a) and the eBird database (eBird 2022), other special-status wildlife species that have been previously recorded within the project site include Cooper’s hawk (*Accipiter cooperii*; a State

WL species), tricolored blackbird (*Agelaius tricolor*; a ST species), burrowing owl (*Athene cunicularia*; a State SSC), short-eared owl (*Aseo flammeus*; a State SSC), ferruginous hawk (*Buteo regalis*; a State WL species), mountain plover (*Charadrius montanus*; a State SSC), northern harrier (*Circus hudsonius*; a State SSC), merlin (*Falco columbarius*; a State WL species), prairie falcon (*Falco mexicanus*; a State WL species), and white-faced ibis (*Plegadis chihi*; a State WL species). Desert kit fox (*Vulpes macrotis arsipus*; a CFGC furbearing mammal) and American badger (*Taxidea taxus*; a State SSC) sign, but not live animals, have been observed on-site (SWCA 2017). Although not documented within the project site according to the records that were consulted, desert tortoise (*Gopherus agassizii*; a ST and federally threatened [FT] species) and Mohave ground squirrel (*Xerospermophilus mohavensis*; a ST species) are both known to occur in the region and suitable habitat may be present on-site, particularly in areas that are contiguous with undeveloped open space.

Critical Habitat

Under the definition included in the FESA, designated Critical Habitat refers to specific areas within the geographical range of a species that were occupied at the time it was listed that contain the physical or biological features that are essential to the survival and eventual recovery of that species. Areas of Critical Habitat may require special management considerations or protection, regardless of whether the species is still extant in the area. Areas that were not known to be occupied at the time a species was listed can also be designated Critical Habitat if they contain one or more of the physical or biological features that are essential to that species' conservation and if the other areas that are occupied are inadequate to ensure the species' recovery. If a project may result in take or adverse modification to a species' designated Critical Habitat and the project has a federal nexus, the project proponent may be required to provide suitable mitigation. Projects with a federal nexus may include projects that occur on federal lands, require federal permits (e.g., CWA Section 404 permit), or receive any federal oversight or funding. If there is a federal nexus, then the federal agency that is responsible for providing funds or permits would be required to consult with the USFWS pursuant to the FESA.

The project site is not located within USFWS-designated Critical Habitat for any federally listed species (refer to Figure 6, *Critical Habitat*).

Significant Ecological Areas

The project site is located within the Antelope Valley SEA (refer to Figure 7, *Significant Ecological Areas*). The SEA extends from the Angeles National Forest to the playa lakes within Edwards Air Force Base, encompassing the whole of the two largest drainages exiting the northern slope of the San Gabriel Mountain range, and its geographical features serve as a major habitat linkage and movement corridor for all wildlife species within its vicinity. Ecologically "generalist" species have the ability to move across such vast areas and through changing habitat types. For such species, the SEA may serve as an important system for long-term inter-population genetic exchange. For smaller or less-mobile species, or taxa which are more narrowly restricted in their habitat needs, the SEA can serve as a broad linkage zone, in which individual movement can take place during seasonal or population dispersal. This provides essential genetic

exchange within and between metapopulations. The two drainages, combined with the upland terrestrial desert-montane transect portion of the SEA, ensure linkage values and direct movement zones for all of the wildlife species present within the Los Angeles County portion of the Antelope Valley.

However, the SEA Program and the SEA Ordinance only apply to adopted SEAs located within unincorporated areas.⁷ SEAs that are designated within incorporated areas in Los Angeles County are not subject to the restrictions of the SEA Ordinance. Within the project site, the Antelope Valley SEA is located within the incorporated boundaries of the City of Lancaster, and thus is not subject to any development restrictions associated with the SEA Program or SEA Ordinance or with Los Angeles County Code Chapter 22.102.

Conclusions and Recommendations

All findings of this report as described above and summarized in this section should be considered preliminary and are based on a review of limited data available from previous studies and online databases. No field surveys were conducted specifically in support of this report. This section summarizes the primary findings of this report and provides general recommendations and guidance for future proposed activities within the project site.

The only special-status plant species that is known to occur within the project site is western Joshua tree (a SC species). As a candidate for listing under CESA, western Joshua trees are protected from take without an Incidental Take Permit. Other special-status plant species that have been recorded in the general project vicinity include alkali mariposa lily (CRPR 1B.2), Mojave spineflower (CRPR 4.2), sagebrush loeflingia (CRPR 2B.2), crowned muilla (CRPR 4.2) Lancaster milk-vetch (CRPR 1B.1), white pygmy-poppy (CRPR 4.2), Mojave Indian paintbrush (CRPR 4.3), Parry's spineflower (CRPR 1B.1), Rosamond eriastrum (CRPR 1B.1), and golden goodmania (CRPR 4.2). For any future proposed development on undisturbed (i.e., undeveloped and non-agriculture) lands, it is recommended that a species-specific habitat assessment and/or focused plant surveys be conducted if suitable habitat is present to support these species or any other special-status plant species that are known to occur in the region.

- Removal of western Joshua trees would require an accurate census of the number of trees to be impacted, as well as an approved Incidental Take Permit from the CDFW.
- Potential presence of other special-status plant species may support conducting focused plant surveys. Plants protected under CESA or with a CRPR 1 or 2 are considered for significant impacts during CEQA analyses. Plants with CRPR 3 or 4 are typically not considered during CEQA analyses.

Special-status wildlife species that have been documented on-site or in the immediate vicinity include Swainson's hawk (a ST species), California horned lark (a State WL species), loggerhead shrike (a State SSC), yellow-headed blackbird (a State SSC), Cooper's hawk (a State WL species), tricolored blackbird (a

⁷ <https://planning.lacounty.gov/site/sea/wp-content/uploads/2019/05/Regional-Planning-Commission-Complete-Hearing-Package-2-27-19.pdf>

ST species). burrowing owl (a State SSC), short-eared owl (a State SSC), ferruginous hawk (a State WL species), mountain plover (a State SSC), northern harrier (a State SSC), merlin (a State WL species), prairie falcon (a State WL species), and white-faced ibis (a State WL species). Desert kit fox (CGFC protected furbearing mammal) and American badger (a State SSC) sign has been documented within the project site, and both desert tortoise (a FT and ST species) and Mohave ground squirrel (a ST species) are known to occur in the region.

- In areas of suitable habitat, focused surveys for burrowing owl, desert kit fox, American badger, desert tortoise, and/or Mohave ground squirrel may be required in support of a CEQA analysis.
- Regardless of focused survey findings, if suitable habitat for burrowing owl is present, two (2) separate preconstruction surveys are required prior to any ground disturbance, one no less than 14 days prior to disturbance, and the other within 24 hours prior to ground disturbance.
- If any renewable energy uses are proposed within the project site, focused surveys for Swainson's hawks conforming to the 2010 Antelope Valley protocol (CEC and CDFW 2010) may be required.
- Take of any wildlife species that are protected under FESA, CESA, and/or are designated as SSC or fully protected species in California would potentially qualify for significant impacts during CEQA analyses. Species that are protected under FESA and/or CESA would also require consultation with the USFWS under Section 7 or Section 10 of FESA and/or an Incidental Take Permit from the CDFW under Section 2081 of CESA.
- Take of burrowing special-status animals is likely to require a relocation plan and extensive coordination to move animals offsite.

Potentially federal and State jurisdictional resources are known to be present within the project site but were not analyzed as part of this report.

- As part of the CEQA analysis of any proposed development within the project site, a regulatory specialist should be consulted to determine if a jurisdictional delineation is necessary. If so, a jurisdictional delineation should be conducted to determine the presence or absence of potentially jurisdictional features within a proposed impact area.
- Impacts to jurisdictional features may require regulatory permits from the USACE, RWQCB, and/or the CDFW as applicable.

In order to develop a clearer understanding of on-site biological resources, future impacts that could occur, and future mitigation and/or permitting that may be required, it is recommended that a biological field survey of the entire proposed Light Industrial Overlay Zone be conducted, followed by a detailed biological resources assessment and focused species surveys as appropriate to determine baseline data for the project site. Regardless of whether project-wide focused surveys are conducted within the entire Light Industrial Overlay Zone, additional focused surveys may be required for individual proposed developments at a later date.

Please do not hesitate to contact me at (949) 533-0918 or ryan.winkleman@mbakerintl.com or Tom Millington at (949) 246-7004 or tommillington@mbakerintl.com should you have any questions or require further information.

Sincerely,



Ryan Winkleman
Senior Biologist



Tom Millington
Senior Biologist

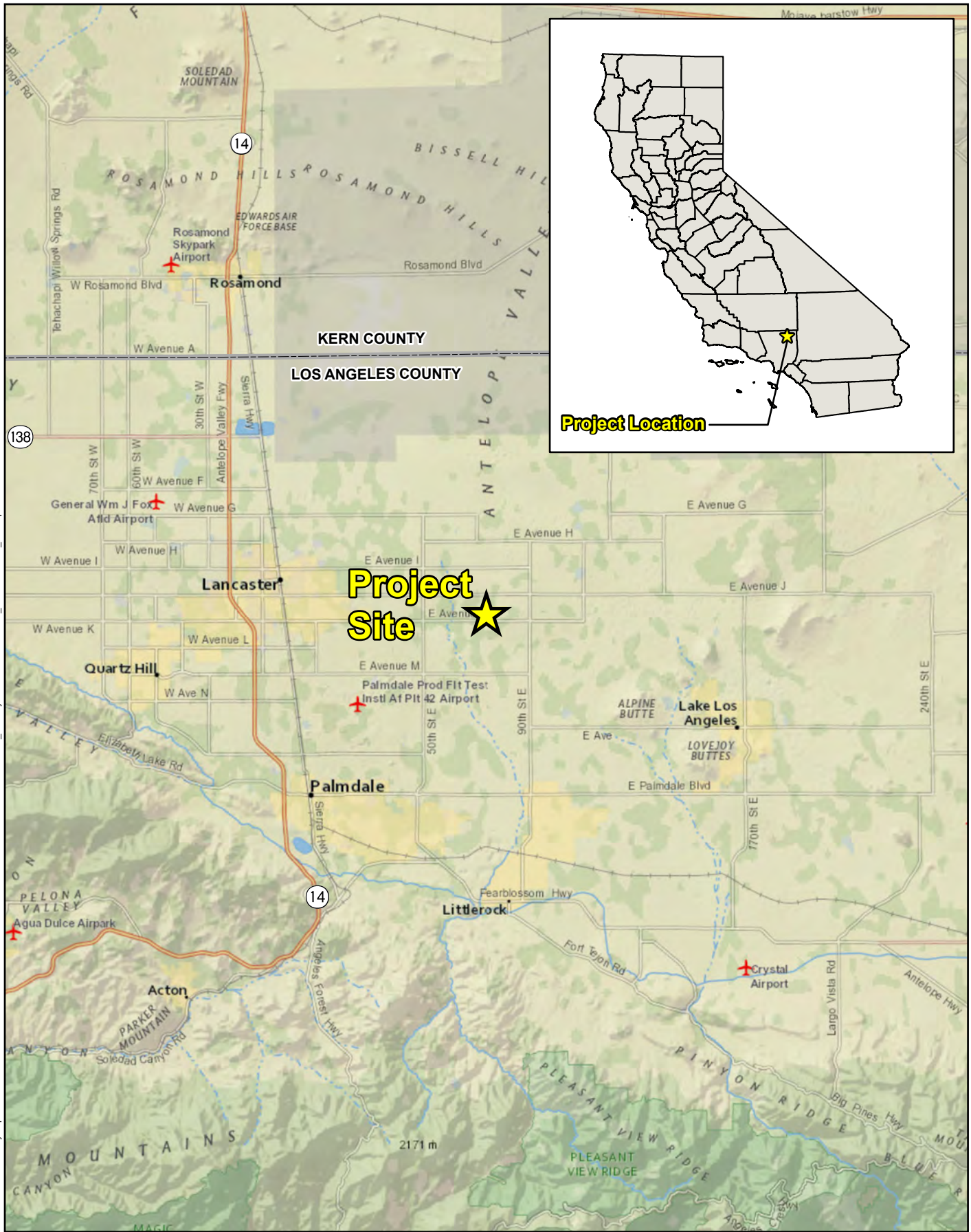
Attachments:

- A. Project Figures*
- B. Literature Review Results*
- C. References*

Attachment A

Project Figures

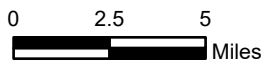
6/6/2022 JN C:\Users\ryan.phaneuf\OneDrive - Michael Baker International\Documents\GIS\1188955 - Lancaster Cannabis_Overlay\GIS\APRX\Lancaster_East\Lancaster_East.aprx



LANCASTER EAST SIDE PROJECT – LIGHT INDUSTRIAL OVERLAY ZONE
BIOLOGICAL RESOURCES DUE DILIGENCE ASSESSMENT

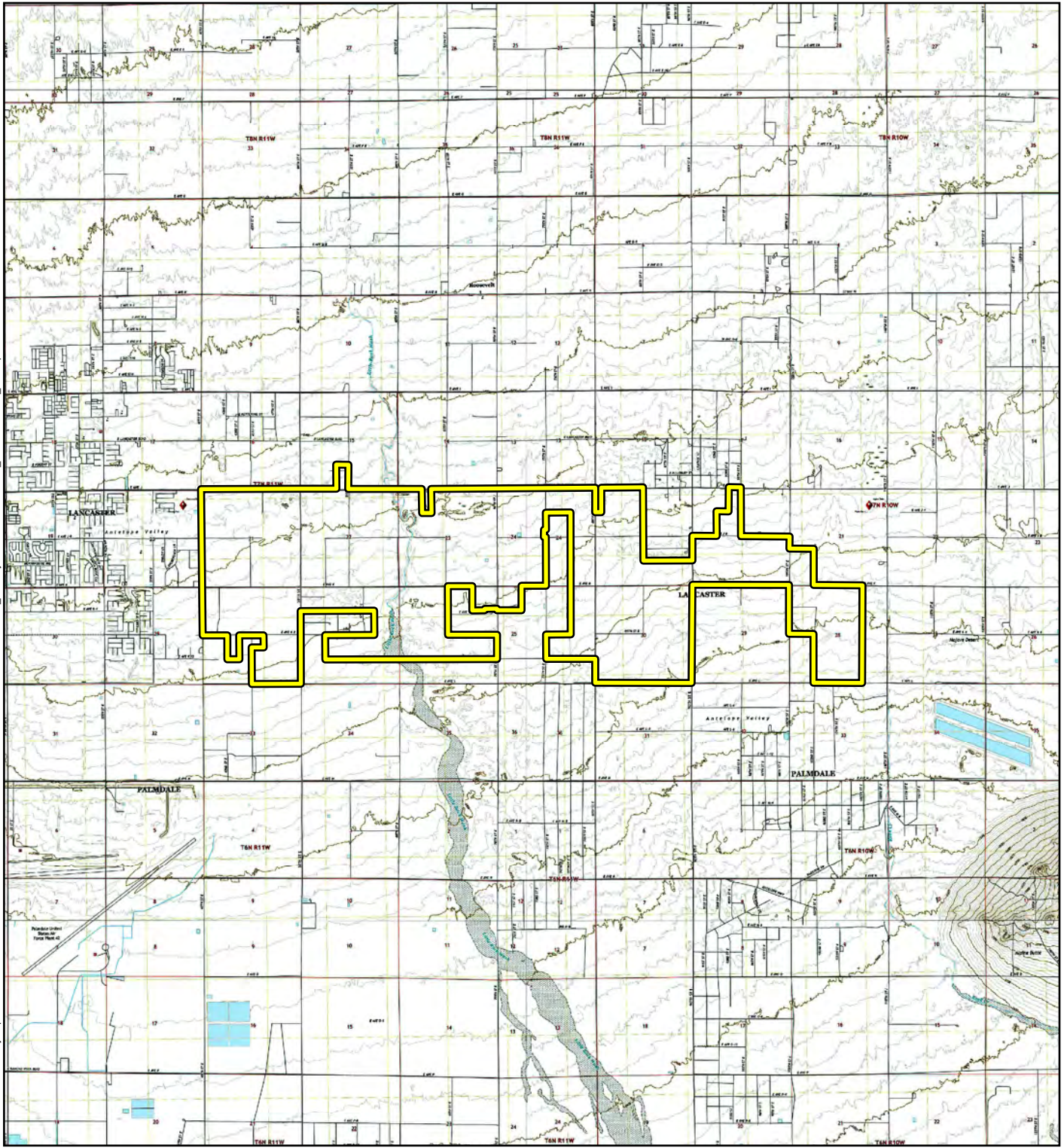
Regional Vicinity

Figure 1




Source: ArcGIS Online, 2018

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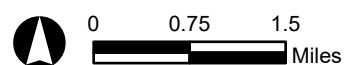


Legend

 Project Site

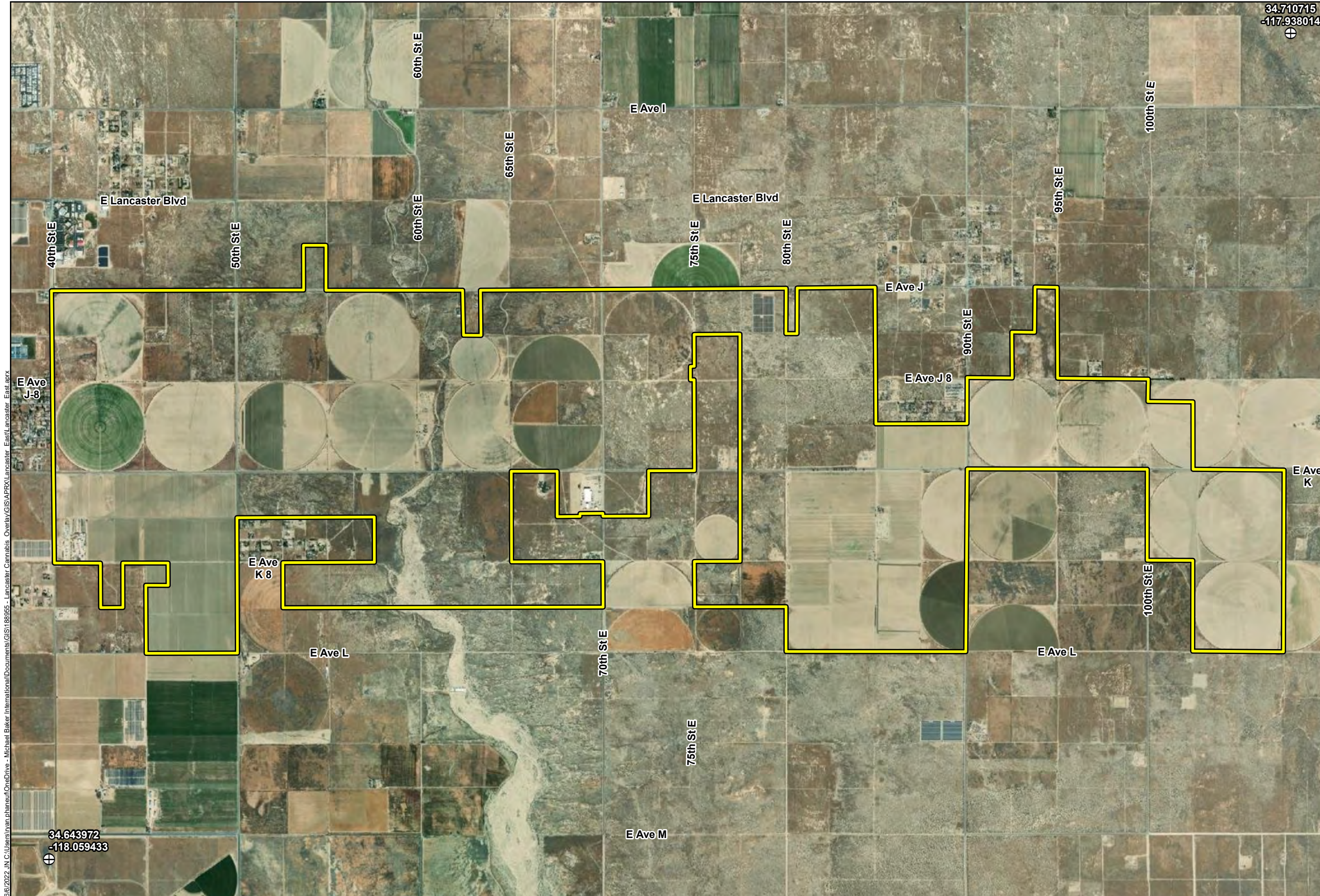
LANCASTER EAST SIDE PROJECT – LIGHT INDUSTRIAL OVERLAY ZONE
BIOLOGICAL RESOURCES DUE DILIGENCE ASSESSMENT

Project Vicinity



Source: USGS 7.5-Minute topographic quadrangle maps: *Alpine Butte, Little Rock, and Palmdale, and Rosemond Lake, California (2021), Little Rock, and Redman, California (2022)*

Figure 2

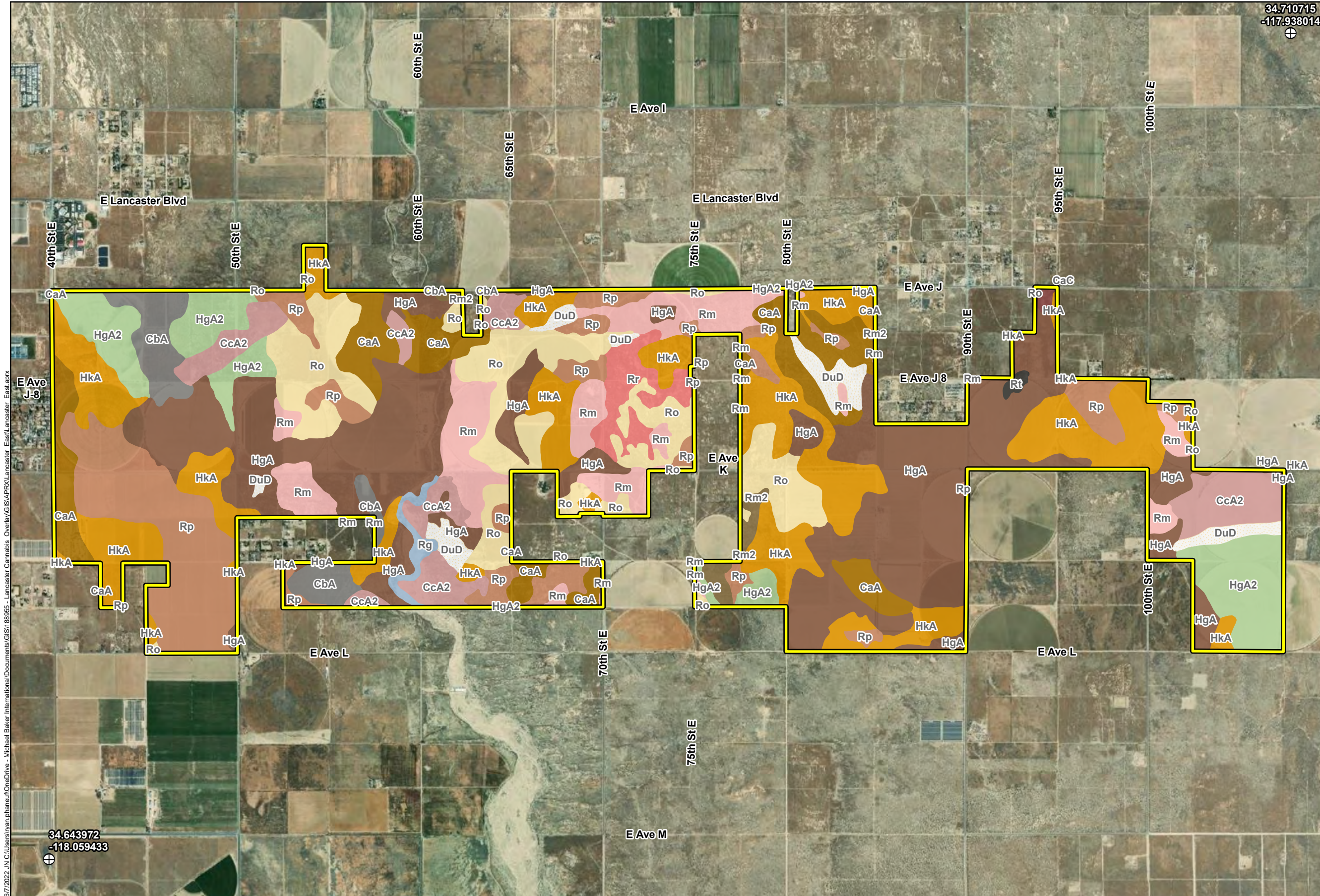


Legend

- Project Site
- Reference Point

0 1,400 2,800 Feet

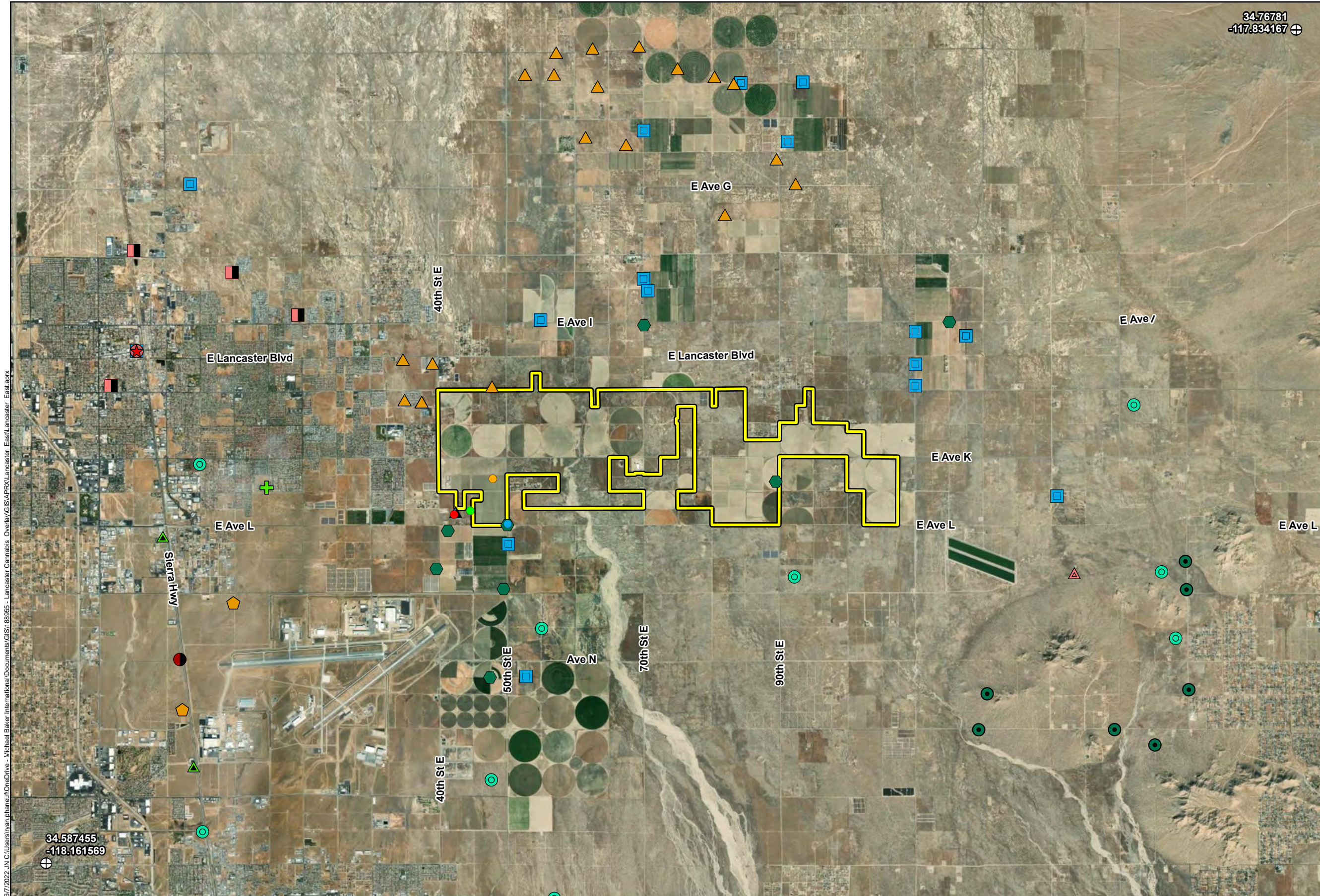
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Legend

- Project Site
- CaA Cajon loamy sand, 0 to 2 percent slopes
- CaC Cajon loamy sand, 2 to 9 percent slopes
- CbA Cajon loamy sand, loamy substratum, 0 to 2 percent slopes
- CcA2 Cajon loamy fine sand, 0 to 2 percent slopes, hummocky
- DuD Dune land
- HgA Hesperia loamy fine sand, 0 to 2 percent slopes
- HgA2 Hesperia loamy fine sand, 0 to 2 percent slopes, hummocky
- HkA Hesperia fine sandy loam, 0 to 2 percent slopes
- Rg Riverwash
- Rm Rosamond loamy fine sand
- Rm2 Rosamond loamy fine sand, hummocky
- Ro Rosamond fine sandy loam
- Rp Rosamond loam
- Rr Rosamond loam, saline-alkali
- Rt Rosamond silty clay loam
- Reference Point

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Legend

- Project Site
- Reference Point

Michael Baker International

- California Horned Lark (*Eremophila alpestris actia*)
- Loggerhead Shrike (*Lanius ludovicianus*)
- Swainson's Hawk (*Buteo swainsoni*)
- Yellow-headed Blackbird (*Xanthocephalus xanthocephalus*)

California Natural Diversity Database

Plants

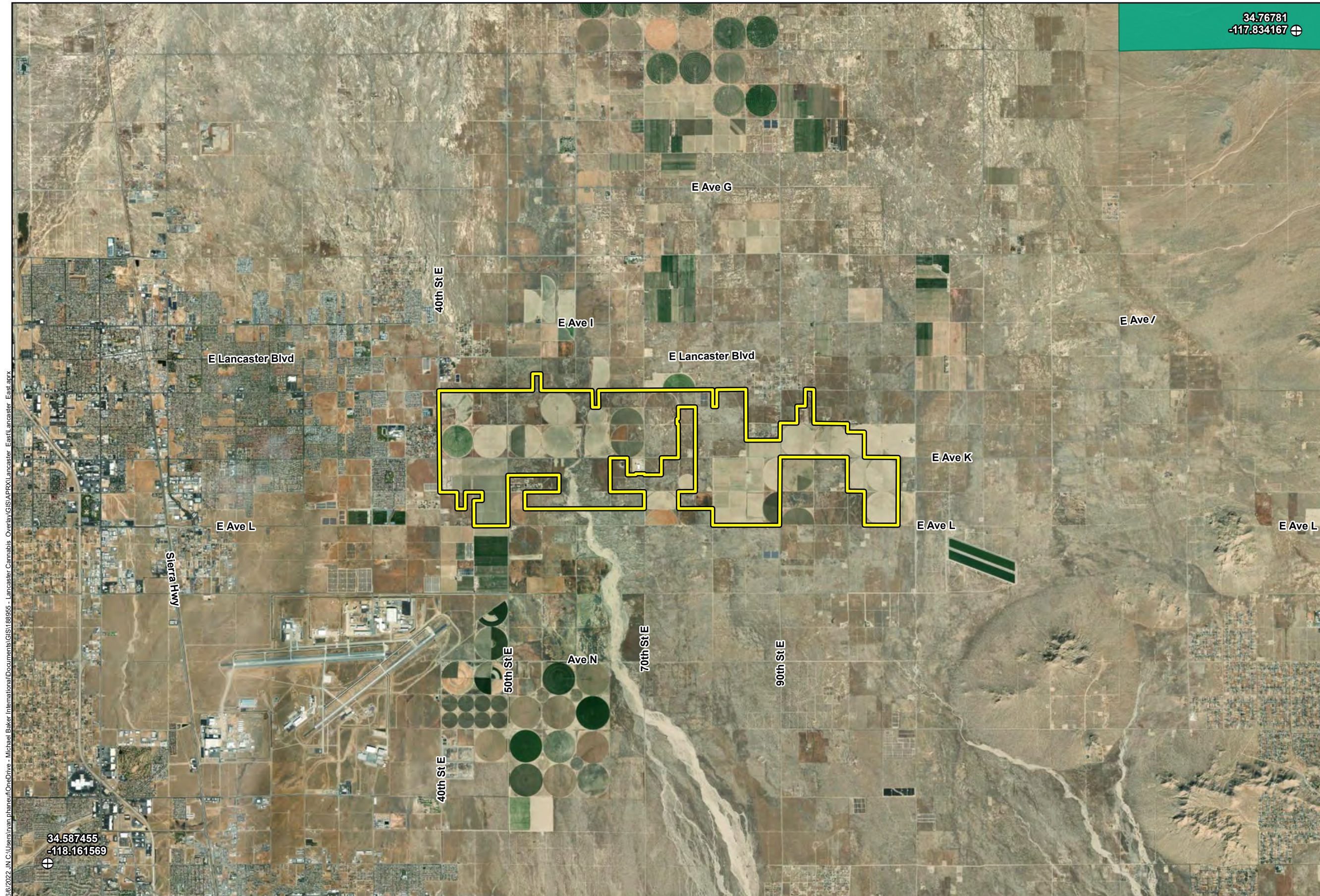
- Alkali Mariposa-lily (*Calochortus striatus*)
- Lancaster Milk-vetch (*Astragalus preussii* var. *laxiflorus*)
- Sagebrush Loefflingia (*Loeflingia squarrosa* var. *artemisiarum*)
- White Pygmy-poppy (*Canbya candida*)

Wildlife




- Burrowing Owl (*Athene cunicularia*)
- Coast Horned Lizard (*Phrynosoma blainvillii*)
- Desert Tortoise (*Gopherus agassizii*)
- Ferruginous Hawk (*Buteo regalis*)
- Le Conte's Thrasher (*Toxostoma lecontei*)
- Loggerhead Shrike (*Lanius ludovicianus*)
- Mohave Ground Squirrel (*Xerospermophilus mohavensis*)
- Mountain Plover (*Charadrius montanus*)
- Northern California Legless Lizard (*Anniella pulchra*)
- Prairie Falcon (*Falco mexicanus*)
- Swainson's Hawk (*Buteo swainsoni*)

0 3,750 7,500 Feet

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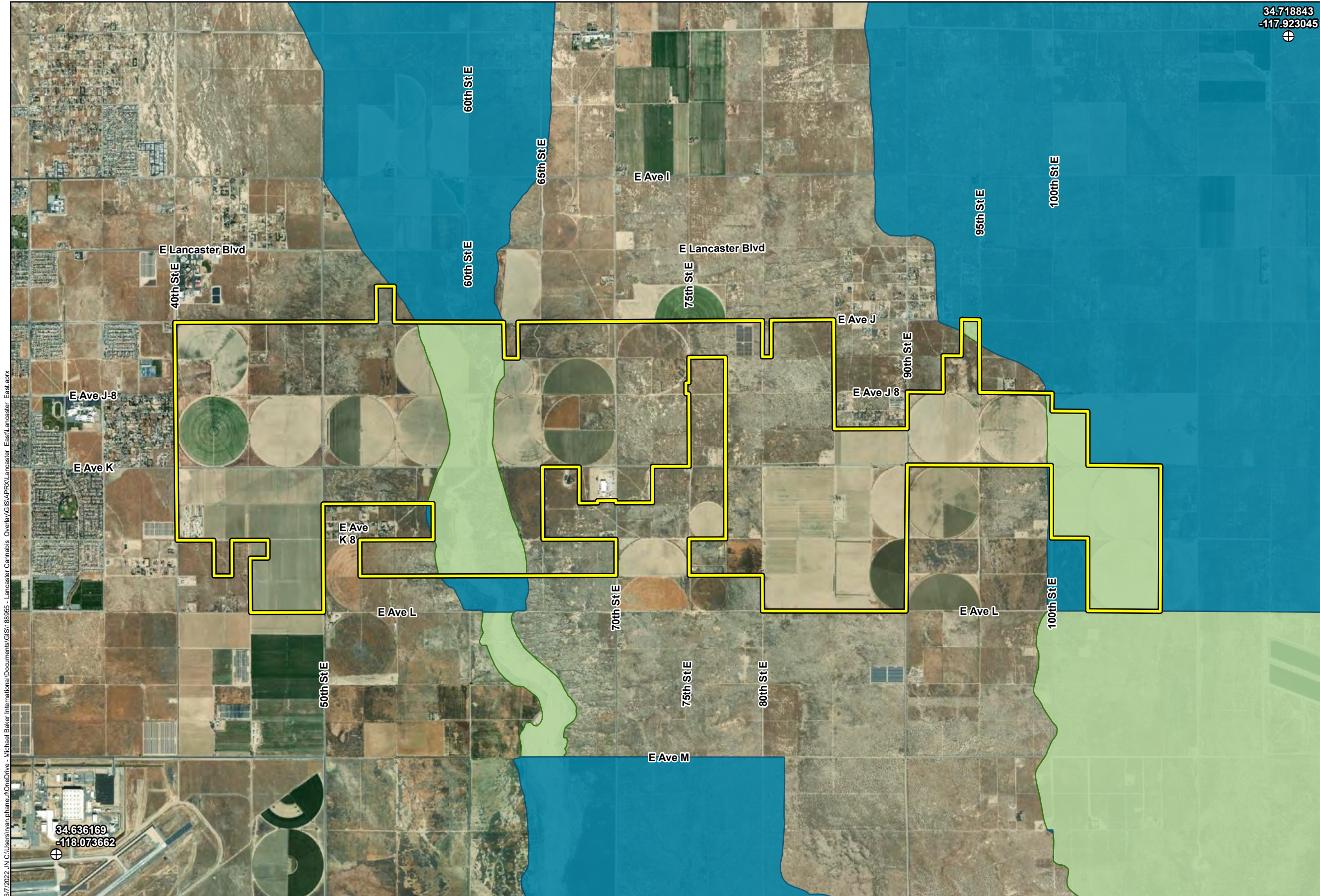


Legend

-  Project Site
-  Desert Tortoise (*Gopherus agassizii*)
-  Reference Point

0 3,750 7,500
Feet


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Legend

- Project Site
- Antelope Valley
- Antelope Valley (Incorporated City)*
- Reference Point

*Not subject to Los Angeles County's SEA Ordinance



0 1,750 3,500
Feet

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Attachment B

Literature Review Results



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad (Lancaster East (3411861) OR Lancaster West (3411862) OR Alpine Butte (3411768) OR Rosamond (3411872) OR Rosamond Lake (3411871) OR Redman (3411778) OR Rogers Lake South (3411777) OR Hi Vista (3411767) OR Lovejoy Buttes (3411757) OR Littlerock (3411758) OR Palmdale (3411851) OR Ritter Ridge (3411852)) AND Taxonomic Group (Ferns OR Gymnosperms OR Monocots OR Dicots OR Lichens OR Bryophytes)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Astragalus hornii</i> var. <i>hornii</i> Horn's milk-vetch	PDFAB0F421	None	None	GUT1	S1	1B.1
<i>Astragalus preussii</i> var. <i>laxiflorus</i> Lancaster milk-vetch	PDFAB0F721	None	None	G4T2	S1	1B.1
<i>Calochortus striatus</i> alkali mariposa-lily	PMLIL0D190	None	None	G3?	S2S3	1B.2
<i>Canbya candida</i> white pygmy-poppy	PDPAP05020	None	None	G3G4	S3S4	4.2
<i>Chorizanthe parryi</i> var. <i>parryi</i> Parry's spineflower	PDPGN040J2	None	None	G3T2	S2	1B.1
<i>Cymopterus deserticola</i> desert cymopterus	PDAP10U090	None	None	G2	S2	1B.2
<i>Eriastrum rosamondense</i> Rosamond eriastrum	PDPLM030G0	None	None	G1?	S1?	1B.1
<i>Eriophyllum mohavense</i> Barstow woolly sunflower	PDAST3N070	None	None	G2	S2	1B.2
<i>Loeflingia squarrosa</i> var. <i>artemisiarum</i> sagebrush loeflingia	PDCAR0E011	None	None	G5T3	S2	2B.2
<i>Opuntia basilaris</i> var. <i>brachyclada</i> short-joint beavertail	PDCAC0D053	None	None	G5T3	S3	1B.2
<i>Plagiobothrys parishii</i> Parish's popcornflower	PDBOR0V0U0	None	None	G1	S1	1B.1
<i>Puccinellia simplex</i> California alkali grass	PMPOA53110	None	None	G3	S2	1B.2

Record Count: 12



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad IS (Lancaster East (3411861) OR Lancaster West (3411862) OR Alpine Butte (3411768) OR Rosamond (3411872) OR Rosamond Lake (3411871) OR Redman (3411778) OR Rogers Lake South (3411777) OR Hi Vista (3411767) OR Lovejoy Buttes (3411757) OR Littlerock (3411758) OR Palmdale (3411851) OR Ritter Ridge (3411852))
 AND Taxonomic Group IS (Fish OR Amphibians OR Reptiles OR Birds OR Mammals OR Mollusks OR Arachnids OR Crustaceans OR Insects)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Accipiter cooperii</i> Cooper's hawk	ABNKC12040	None	None	G5	S4	WL
<i>Agelaius tricolor</i> tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S1S2	SSC
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	ABPBX91091	None	None	G5T3	S3	WL
<i>Anniella pulchra</i> Northern California legless lizard	ARACC01020	None	None	G3	S3	SSC
<i>Arizona elegans occidentalis</i> California glossy snake	ARADB01017	None	None	G5T2	S2	SSC
<i>Artemisospiza belli belli</i> Bell's sage sparrow	ABPBX97021	None	None	G5T2T3	S3	WL
<i>Asio flammeus</i> short-eared owl	ABNSB13040	None	None	G5	S3	SSC
<i>Athene cunicularia</i> burrowing owl	ABNSB10010	None	None	G4	S3	SSC
<i>Bombus crotchii</i> Crotch bumble bee	IIHYM24480	None	None	G2	S1S2	
<i>Buteo regalis</i> ferruginous hawk	ABNKC19120	None	None	G4	S3S4	WL
<i>Buteo swainsoni</i> Swainson's hawk	ABNKC19070	None	Threatened	G5	S3	
<i>Charadrius montanus</i> mountain plover	ABNNB03100	None	None	G3	S2S3	SSC
<i>Charadrius nivosus nivosus</i> western snowy plover	ABNNB03031	Threatened	None	G3T3	S2	SSC
<i>Circus hudsonius</i> northern harrier	ABNKC11011	None	None	G5	S3	SSC
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
<i>Emys marmorata</i> western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
<i>Eumops perotis californicus</i> western mastiff bat	AMACD02011	None	None	G4G5T4	S3S4	SSC



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Falco columbarius</i> merlin	ABNKD06030	None	None	G5	S3S4	WL
<i>Falco mexicanus</i> prairie falcon	ABNKD06090	None	None	G5	S4	WL
<i>Gopherus agassizii</i> desert tortoise	ARAAF01012	Threatened	Threatened	G3	S2S3	
<i>Helminthoglypta fontiphila</i> Soledad shoulderband	IMGASC2250	None	None	G1	S1	
<i>Lanius ludovicianus</i> loggerhead shrike	ABPBR01030	None	None	G4	S4	SSC
<i>Onychomys torridus ramona</i> southern grasshopper mouse	AMAFF06022	None	None	G5T3	S3	SSC
<i>Perognathus inornatus</i> San Joaquin pocket mouse	AMAFD01060	None	None	G2G3	S2S3	
<i>Phrynosoma blainvillii</i> coast horned lizard	ARACF12100	None	None	G3G4	S3S4	SSC
<i>Plegadis chihi</i> white-faced ibis	ABNGE02020	None	None	G5	S3S4	WL
<i>Taxidea taxus</i> American badger	AMAJF04010	None	None	G5	S3	SSC
<i>Thamnophis hammondi</i> two-striped gartersnake	ARADB36160	None	None	G4	S3S4	SSC
<i>Toxostoma lecontei</i> Le Conte's thrasher	ABPBK06100	None	None	G4	S3	SSC
<i>Vireo bellii pusillus</i> least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S2	
<i>Xerospermophilus mohavensis</i> Mohave ground squirrel	AMAFB05150	None	Threatened	G2G3	S2S3	

Record Count: 31

Search Results

23 matches found. Click on scientific name for details

Search Criteria: Quad is one of [3411861:3411768:3411872:3411871:3411778:3411777:3411767:3411757:3411758:3411851:3411852:3411862]

▲ SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFEFORM	BLOOMING PERIOD	FED LIST	STATE LIST	GLOBAL RANK	STATE RANK	CA RARE PLANT RANK	PHOTO
<i>Androsace elongata</i> ssp. <i>acuta</i>	California androsace	Primulaceae	annual herb	Mar-Jun	None	None	G5?T3T4	S3S4	4.2	 © 2008 Aaron Schusteff
<i>Astragalus hornii</i> var. <i>hornii</i>	Horn's milk-vetch	Fabaceae	annual herb	May-Oct	None	None	GUT1	S1	1B.1	No Photo Available
<i>Astragalus preussii</i> var. <i>laxiflorus</i>	Lancaster milk-vetch	Fabaceae	perennial herb	Mar-May	None	None	G4T2	S1	1B.1	No Photo Available
<i>Calochortus striatus</i>	alkali mariposa-lily	Liliaceae	perennial bulbiferous herb	Apr-Jun	None	None	G3?	S2S3	1B.2	No Photo Available
<i>Calystegia peirsonii</i>	Peirson's morning-glory	Convolvulaceae	perennial rhizomatous herb	Apr-Jun	None	None	G4	S4	4.2	No Photo Available
<i>Canbya candida</i>	white pygmy-poppy	Papaveraceae	annual herb	Mar-Jun	None	None	G3G4	S3S4	4.2	No Photo Available
<i>Castilleja plagiotoma</i>	Mojave paintbrush	Orobanchaceae	perennial herb (hemiparasitic)	Apr-Jun	None	None	G4	S4	4.3	No Photo Available
<i>Chorizanthe parryi</i> var. <i>parryi</i>	Parry's spineflower	Polygonaceae	annual herb	Apr-Jun	None	None	G3T2	S2	1B.1	No Photo Available
<i>Chorizanthe spinosa</i>	Mojave spineflower	Polygonaceae	annual herb	Mar-Jul	None	None	G4	S4	4.2	 © 2011 Benjamin Smith
<i>Cymopterus deserticola</i>	desert cymopterus	Apiaceae	perennial herb	Mar-May	None	None	G2	S2	1B.2	No Photo Available
<i>Diplacus johnstonii</i>	Johnston's monkeyflower	Phrymaceae	annual herb	May-Aug	None	None	G4	S4	4.3	No Photo Available
<i>Eriastrum rosamondense</i>	Rosamond eriastrum	Polemoniaceae	annual herb	Apr-May(Jun-Jul)	None	None	G1?	S1?	1B.1	No Photo Available
<i>Eriophyllum mohavense</i>	Barstow woolly sunflower	Asteraceae	annual herb	Mar-May	None	None	G2	S2	1B.2	No Photo Available
<i>Goodmania luteola</i>	golden goodmania	Polygonaceae	annual herb	Apr-Aug	None	None	G3	S3	4.2	 © 2007 Steve Matson
<i>Loeflingia squarrosa</i> var. <i>artemisiarum</i>	sagebrush loeflingia	Caryophyllaceae	annual herb	Apr-May	None	None	G5T3	S2	2B.2	No Photo Available
<i>Lycium torreyi</i>	Torrey's box-thorn	Solanaceae	perennial shrub	(Jan-Feb)Mar-Jun(Sep-Nov)	None	None	G4G5	S3	4.2	No Photo Available
<i>Muilla coronata</i>	crowned muilla	Themidaceae	perennial bulbiferous herb	Mar-Apr(May)	None	None	G3	S3	4.2	No Photo Available

<i>Opuntia basilaris</i> var. <i>brachyclada</i>	short-joint beavertail	Cactaceae	perennial stem	Apr-Jun(Aug)	None	None	G5T3	S3	1B.2	No Photo Available
<i>Perideridia pringlei</i>	adobe yampah	Apiaceae	perennial herb	Apr-Jun(Jul)	None	None	G4	S4	4.3	No Photo Available
<i>Plagiobothrys parishii</i>	Parish's popcornflower	Boraginaceae	annual herb	Mar-Jun(Nov)	None	None	G1	S1	1B.1	No Photo Available
<i>Puccinellia simplex</i>	California alkali grass	Poaceae	annual herb	Mar-May	None	None	G3	S2	1B.2	No Photo Available
<i>Syntrichopappus lemmonii</i>	Lemmon's syntrichopappus	Asteraceae	annual herb	Apr-May(Jun)	None	None	G4	S4	4.3	No Photo Available
<i>Yucca brevifolia</i>							GNR	SNR	CBR	No Photo Available

Showing 1 to 23 of 23 entries

Suggested Citation:

California Native Plant Society, Rare Plant Program. 2022. Rare Plant Inventory (online edition, v9-01 1.5). Website <https://www.rareplants.cnps.org> [accessed 27 May 2022].

CONTACT US

Send questions and comments to rareplants@cnps.org.



Developed by
Rincon Consultants, Inc.

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CONTRIBUTORS

[The Calflora Database](#)
[The California Lichen Society](#)
[California Natural Diversity Database](#)
[The Jepson Flora Project](#)
[The Consortium of California Herbaria](#)
[CalPhotos](#)

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Los Angeles County, California



Local office

Carlsbad Fish And Wildlife Office

☎ (760) 431-9440

📠 (760) 431-5901

2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Condor <i>Gymnogyps californianus</i> There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/8193	Endangered

Reptiles

NAME	STATUS
Desert Tortoise <i>Gopherus agassizii</i> There is final critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/4481	Threatened

Insects

NAME

STATUS

Monarch Butterfly *Danaus plexippus*

Candidate

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/9743>

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\)](#) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

<p>California Thrasher <i>Toxostoma redivivum</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Jan 1 to Jul 31
<p>Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470</p>	Breeds Jan 15 to Jun 10
<p>Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680</p>	Breeds Dec 1 to Aug 31
<p>Lawrence's Goldfinch <i>Carduelis lawrencei</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464</p>	Breeds Mar 20 to Sep 20
<p>Marbled Godwit <i>Limosa fedoa</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481</p>	Breeds elsewhere
<p>Mountain Plover <i>Charadrius montanus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3638</p>	Breeds elsewhere
<p>Tricolored Blackbird <i>Agelaius tricolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3910</p>	Breeds Mar 15 to Aug 10

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (P)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is

the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

- The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

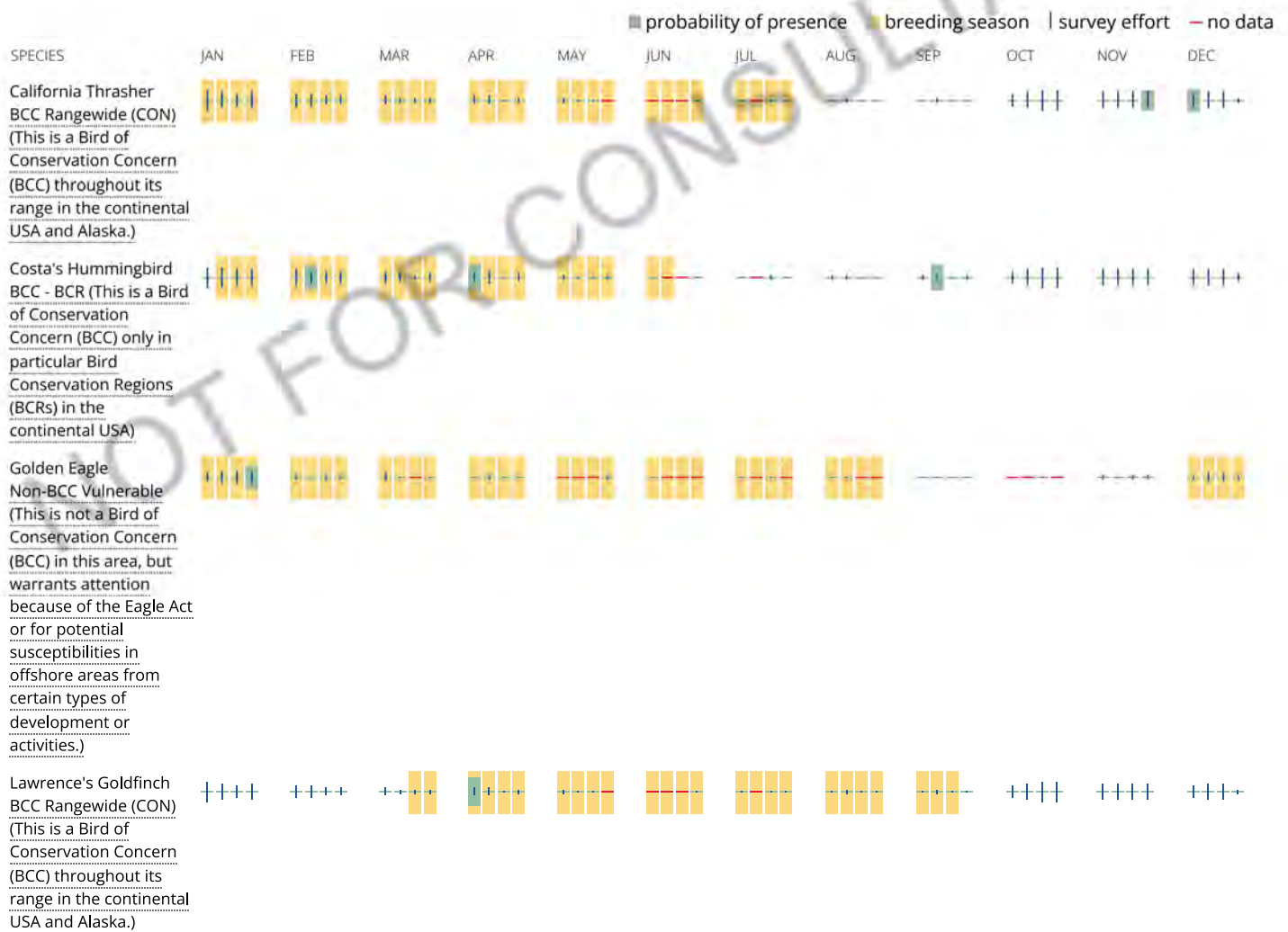
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

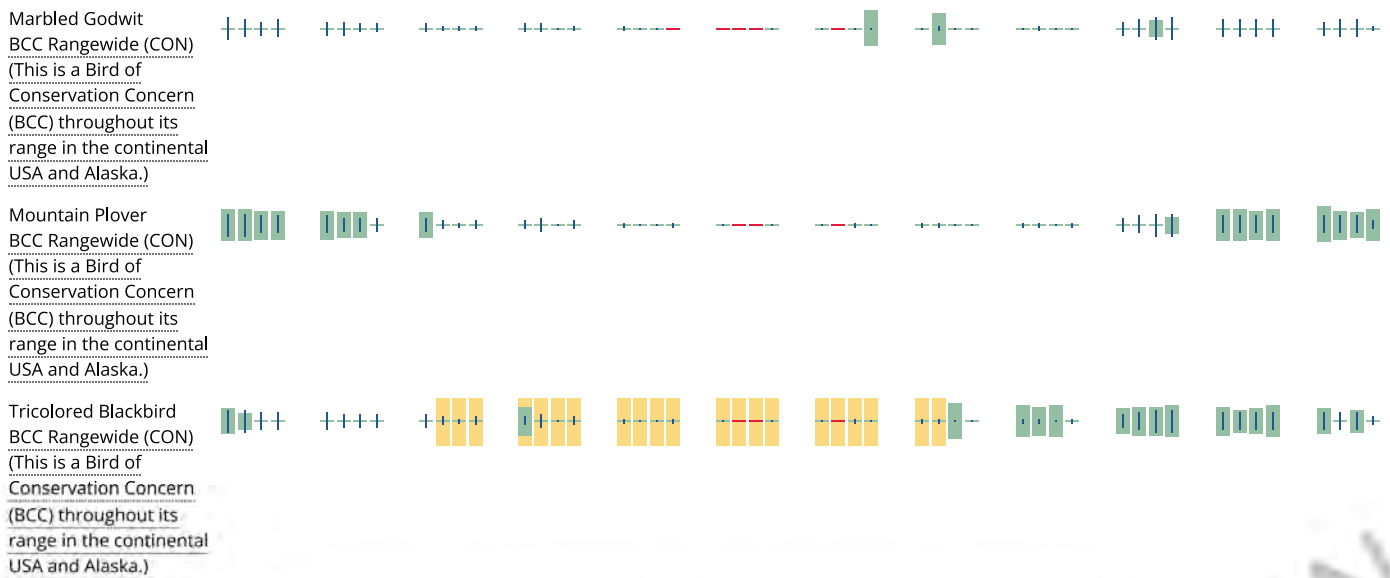
No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern \(BCC\)](#) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and

3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Coastal Barrier Resources System

Projects within the [John H. Chafee Coastal Barrier Resources System](#) (CBRS) may be subject to the restrictions on federal expenditures and financial assistance and the consultation requirements of the Coastal Barrier Resources Act (CBRA) (16 U.S.C. 3501 et seq.). For more information, please contact the local [Ecological Services Field Office](#) or visit the [CBRA Consultations website](#). The CBRA website provides tools such as a flow chart to help determine whether consultation is required and a template to facilitate the consultation process.

THERE ARE NO KNOWN COASTAL BARRIERS AT THIS LOCATION.

Data limitations

The CBRS boundaries used in IPaC are representations of the controlling boundaries, which are depicted on the [official CBRS maps](#). The boundaries depicted in this layer are not to be considered authoritative for in/out determinations close to a CBRS boundary (i.e., within the "CBRS Buffer Zone" that appears as a hatched area on either side of the boundary). For projects that are very close to a CBRS boundary but do not clearly intersect a unit, you may contact the Service for an official determination by following the instructions here: <https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation>

Data exclusions

CBRS units extend seaward out to either the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward extent of the units is not shown in the CBRS data, therefore projects in the offshore areas of units (e.g., dredging, breakwaters, offshore wind energy or oil and gas projects) may be subject to CBRA even if they do not intersect the CBRS data. For additional information, please contact

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

FRESHWATER FORESTED/SHRUB WETLAND

[Palustrine](#)

LAKE

[Lacustrine](#)

RIVERINE

[Riverine](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal

zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

Attachment C

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June 10, 2022

JN 188955

CITY OF LANCASTER
Development Services Department
Attn: *Larissa De La Cruz*
44933 Fern Avenue
Lancaster, California 93534

SUBJECT: Preliminary Desktop Analysis of Potential State and Federal Jurisdictional Waters Within the Lancaster East Side Project – Light Industrial Overlay Zone, City of Lancaster, California

Dear Ms. De La Cruz:

On behalf of the City of Lancaster (City), Michael Baker International (Michael Baker) has prepared this technical letter report to document the jurisdictional authority of the U.S. Army Corps of Engineers Los Angeles District (Corps), Lahontan Regional Water Quality Control Board (Regional Board), and California Department of Fish and Wildlife (CDFW) South Coast Region within the proposed Lancaster East Side Project – Light Industrial Overlay Zone (Overlay Zone; project or project site). Specifically, this report has been prepared to describe, map, and quantify potential aquatic and other hydrologic features located within the project site as determined through a literature and desktop review.

This report explains the methodology utilized to conduct the desktop review, defines the potential jurisdictional authority of the regulatory agencies, and documents the findings made by Michael Baker. This report presents Michael Baker's determination of potential jurisdictional boundaries using the most up-to-date regulations, written policy, and guidance provided by the regulatory agencies. However, it should be noted that a formal jurisdictional delineation should be prepared in order to receive concurrence from the regulatory agencies.

Project Location

The project site is generally located in the eastern portion of the City of Lancaster, east of State Route 14, and north of the Palmdale Regional Airport in the City of Lancaster, Los Angeles County, California (refer to Figure 1, *Regional Vicinity* in Attachment A). The project site is depicted in Sections 21 through 28 of Townships 7 and 8 north, and Range 11 west on the United States Geological Survey's (USGS) *Lancaster East* and Sections 19, 20, 24, 25, 28, 29, and 30, of Township 7 North and Range 11 west on the USGS *Alpine Butte* California 7.5-minute quadrangles (refer to Figure 2, *Project Vicinity* in Attachment A). Specifically, the project site is located immediately south of East Avenue J, east of 40th Street East, north of East Avenue L, and west of 110th Street East (refer to Figure 3, *Project Site* in Attachment A).

Project Description

The project consists of two components: 1) development of a Light Industrial Overlay Zone in the eastern portion of Lancaster; and 2) development of a cannabis facility within the proposed overlay zone. 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. Anticipated 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. This 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 document in compliance with the California Environmental Quality Act (CEQA) at the time such development application(s) are received.

Summary of Regulations

There are three (3) key agencies that regulate activities within streams, wetlands, and riparian areas in California. The Corps Regulatory Division regulates activities pursuant to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. Of the State agencies, the CDFW regulates activities under Sections 1600 *et seq.* of the California Fish and Game Code (CFGC), and the Regional Board regulates activities pursuant to Section 401 of the CWA and Section 13263 of the California Porter-Cologne Water Quality Control Act (Porter-Cologne Act).

Literature Review

A thorough review of relevant literature and materials was conducted to obtain a general understanding of the environmental setting and preliminarily identify features/areas that may fall under the jurisdiction of the regulatory agencies. Relevant materials utilized during the literature review are summarized below with references provided in Attachment B.

Watershed

According to the Water Quality Control Plan for the Lahontan Region (Region 6), the project site is located within the Lancaster Hydrologic Area (HA 626.50) within the Antelope Hydrologic Unit. Watersheds

located within the project site include (from west to east): Piute Ponds Watershed (Hydrologic Unit Code [HUC] 180902061502), HUC 180902062402, Rosamond Lake Watershed (HUC 180902062406), Town of Roosevelt Watershed (HUC 180902061603), Brainard Canyon-Little Rock Wash Watershed (HUC 18090261103), HUC 180902061602, HUC 180902062401, and Buckthorn Lake Watershed (HUC 180902062302) in Antelope Valley.

The Antelope Valley region is a closed topographic basin with no outlet to the ocean. All water that enters the region either infiltrates into the groundwater basin, evaporates, or flows toward three dry lakes located in the region; Rosamond Lake, Buckhorn Lake, and Rogers Lake. In general, groundwater flows northeasterly from the mountain ranges to these dry lakes. Due to the relatively impervious nature of soils within these dry lakes and high evaporation rates, water that collects on the dry lakes eventually evaporates rather than infiltrating into the subsurface. Within this region, surface water flows are carried by ephemeral streams. The most significant streams begin in the San Gabriel Mountains on the southwestern edge of the region and include Big Rock Creek, Little Rock Creek, Amargosa Creek, and Oak Creek from the Tehachapi Mountains¹.

Soils

On-site and adjoining soils were reviewed using the U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), Web Soil Survey (refer to Attachment C). The soil types are described in the *Custom Soil Resources Report for Antelope Valley Area, California* in Attachment C.

Hydric Soils List of California

Michael Baker then reviewed the *Hydric Soils List for California* (USDA 2022) to preliminarily verify whether any of the soils indicated to be within the study area are considered to be hydric. According to the aforementioned list, the following soils within the project site are hydric:

- Cajon loamy sand, 0 to 2 percent slopes (CaA);
- Cajon loamy sand, loamy substratum, 0 to 2 percent slopes (CbA);
- Hesperia loamy fine sand, 0 to 2 percent slopes (HgA);
- Hesperia loamy fine sand, 0 to 2 percent slopes, hummocky (HgA2);
- Hesperia fine sandy loam, 0 to 2 percent slopes (HkA);
- Riverwash (Rg);
- Rosamond loamy fine sand (Rm);
- Rosamond loamy fine sand, hummocky (Rm2);
- Rosamond fine sandy loam (Ro);
- Rosamond loam (Rp);
- Rosamond loam, saline-alkali (Rr); and
- Rosamond silty clay loam (Rt).

¹ North Los Angeles/Kern County Regional Recycled Water Project Final Program Environmental Impact Report, November 2008. Prepared by Environmental Science Associates for Los Angeles County Waterworks District 40, Antelope Valley.

National Wetlands Inventory

Michael Baker reviewed the U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) Mapper. The predominant wetland type mapped in the project site is Little Rock Wash, classified as Riverine (R4SBJ) habitat. Other features located throughout the project site were mapped as the following wetland types: Freshwater Forested/Shrub Wetland (PSS1J), Freshwater pond (PUSJ and PUSJx), and Lake (L2USJ). Refer to Attachment D for the USFWS NWI map.

Preliminary Analysis of Potential Jurisdictional Aquatic Resources within the Overlay Zone

Little Rock Wash

The central portion of the project site is bisected by Little Rock Wash which generally flows in a south to north direction. Little Rock Wash originates in the San Gabriel Mountains located south of the project site and conveys flows north toward Rosamond Lake. Little Rock Wash is an intermittent stream/wash and enters the project site from the south as a natural earthen drainage. Little Rock Wash continues to flow north through the project site as an earthen channel, crossing underneath East Avenue K and East Avenue J within the project site, and continuing north off-site as an earthen channel (Refer to Figure 4, *Potential Jurisdictional Resources Map*).

Based on a desktop review of aerial imagery, no surface flows were identified in association with Little Rock Wash. However, visual indicators of ordinary flows and an ordinary high water mark (OHWM) are apparent and include surface color/tone, including a lighter toned substrate within Little Rock Wash as compared to the darker surface color of the surrounding upland areas, a break in bank slope, visible benches, and a change in vegetation community from sparsely vegetated within the channel to upland species beyond top of bank.

Other Potential Aquatic Resources Mapped By The National Wetlands Inventory

As presented above, multiple potential aquatic features including, Freshwater Forested/Shrub Wetland, Freshwater pond, and Lake mapped in the USFWS NWI Mapper occur within the Overlay Zone. These mapped features are located in the central portion of the Overlay Zone to the east of Little Rock Wash. Based on a review of aerial imagery, these mapped features appear as areas of potential ponding, natural surface depressions, and stock ponds or ditches associated with agricultural activities. No surface water was identified in association with any of the NWI mapped features.

Unnamed Potential Aquatic Resources

Aerial imagery from 1985 to 2022 provided by Google Earth Pro (Google, Inc. 2022) was used to identify multiple potential aquatic features which are not mapped in the NWI. The boundaries of these potential aquatic features were delineated via visual indicators of surface water (ponding), a change in plant community and vegetative cover, break in bank slope, and surface depressions. Based on a review of aerial imagery, these potential aquatic features appear to be stock ponds or ditches associated with agricultural activities. These features have been depicted as purple polygons or lines on Figure 4, *Potential Jurisdictional Resources Map*.

Regulatory Approval Process

U.S. Army Corps of Engineers

The Corps regulates discharges of dredged or fill materials into ‘waters of the U.S. (WoUS), including wetlands, pursuant to Section 404 of the CWA. As indicated above, the Antelope Valley region is a closed topographic basin and all water that enters the region either infiltrates into the groundwater basin, evaporates, or flows toward three dry lakes in the region. As such, aquatic features in this region are not anticipated to support a significant nexus (or connection) to a Relatively Permanent Water (RPW) or a Traditional Navigable Water (TNW) and would be considered isolated. Therefore, aquatic features within the Overlay Zone are not anticipated to be subject to regulation under Section 404 of the CWA and would not fall under Corps’ jurisdiction. Other CWA Approved Jurisdictional Determinations confirm isolated conditions in the region².

Regional Water Quality Control Board

The Regional Board regulates discharges to surface waters pursuant to Section 401 of the CWA and the Porter-Cologne Act. Therefore, a CWA Section 401 Water Quality Certification (WQC) and/or a Waste Discharge Requirements (WDR) issued from the Regional Board may be required prior to commencement of any construction activities within areas under Regional Board jurisdiction. The Regional Board also requires that California Environmental Quality Act (CEQA) compliance be obtained prior to issuance of the final WQC. Further, an application fee would be required, which is calculated based on both the total temporary and permanent impact acreages (as applicable) of jurisdictional impacts.

California Department of Fish and Wildlife

Pursuant to Sections 1600 et seq. of the CFGC, the CDFW regulates any activity that would divert or obstruct the natural flow or alter the bed, channel, or bank of a lake or streambed. CDFW jurisdiction further extends to the outer edge of any associated riparian vegetation. Therefore, formal notification to, and subsequent authorization from CDFW, may be required prior to commencement of any construction activities within areas potential under CDFW jurisdiction. CDFW also requires that CEQA compliance be obtained prior to issuing the final Lake or Streambed Alteration Agreement (LSAA). Further, a notification fee would be required, which is calculated based on project cost and duration.

Recommendations

The findings within this memorandum represent a preliminary analysis only and are constrained by the limitations of a desktop-based analysis. A formal jurisdictional delineation is recommended to confirm the presence or absence of any identified aquatic features, including features that are not visible via aerial imagery (i.e., agricultural, and roadside ditches). In addition, a jurisdictional delineation would determine the extent of State and Federal jurisdictional areas. However, only the regulatory agencies can make a final determination of jurisdictional limits.

² Clean Water Act Approved Jurisdictional Determination for Big Rock Wash. Project ID: SPL-2017-00511, Los Angeles County, California. Finalized November 21, 2017. HUC8 Watershed: 18090206.

Please feel free to contact me at (408) 330-4208 or at timothy.tidwell@mbakerintl.com with any questions you may have regarding the information presented in this report.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Tidwell". The signature is written in a cursive style with a horizontal line extending to the left of the first letter.

Tim Tidwell
Regulatory Specialist, PWS
Natural Resources and Regulatory Permitting

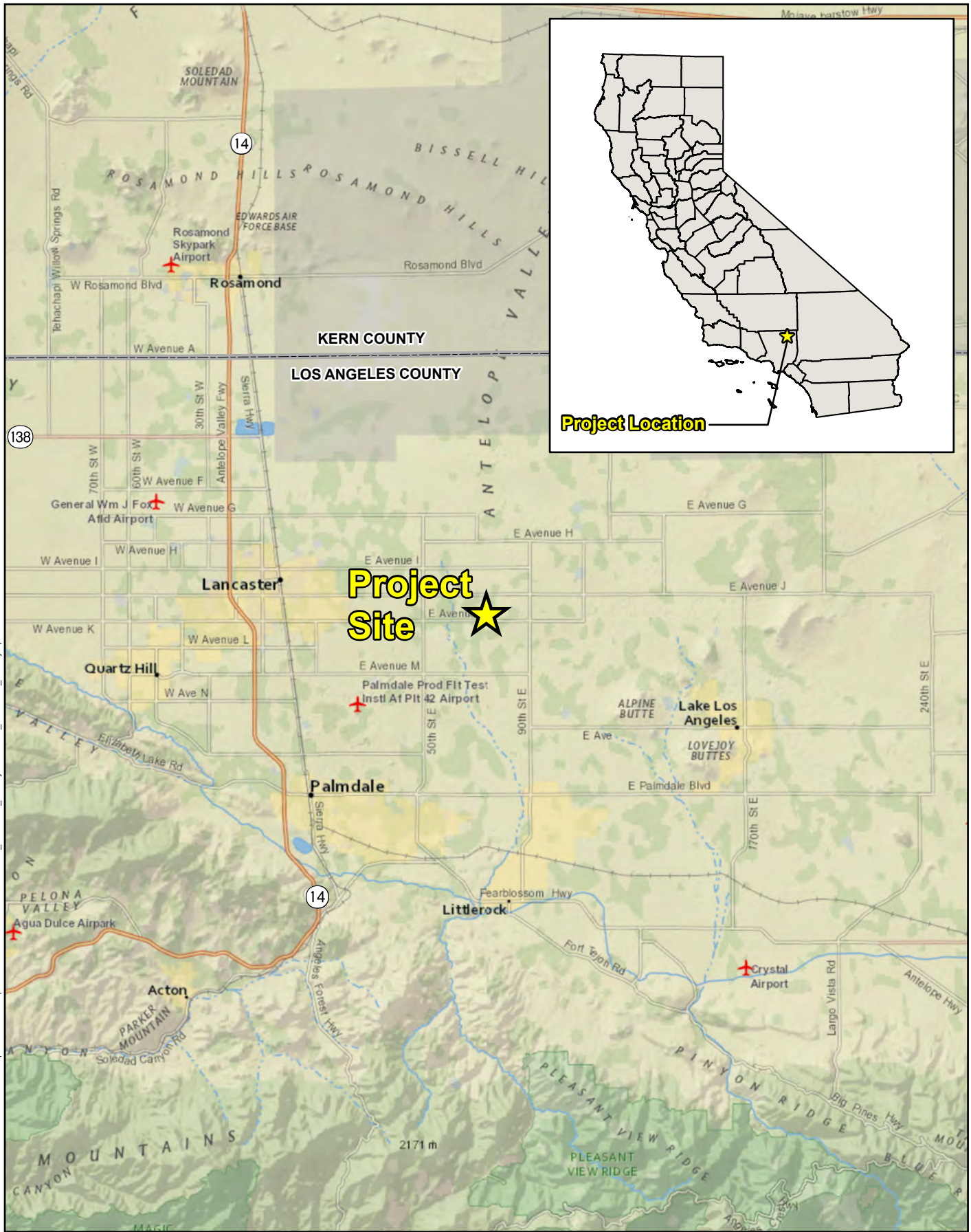
Attachments:

- A. *Project Figures*
- B. *References*
- C. *USDA Custom Soil Resources Report*
- D. *USFWS National Wetlands Inventory Map*

Attachment A

Project Figures

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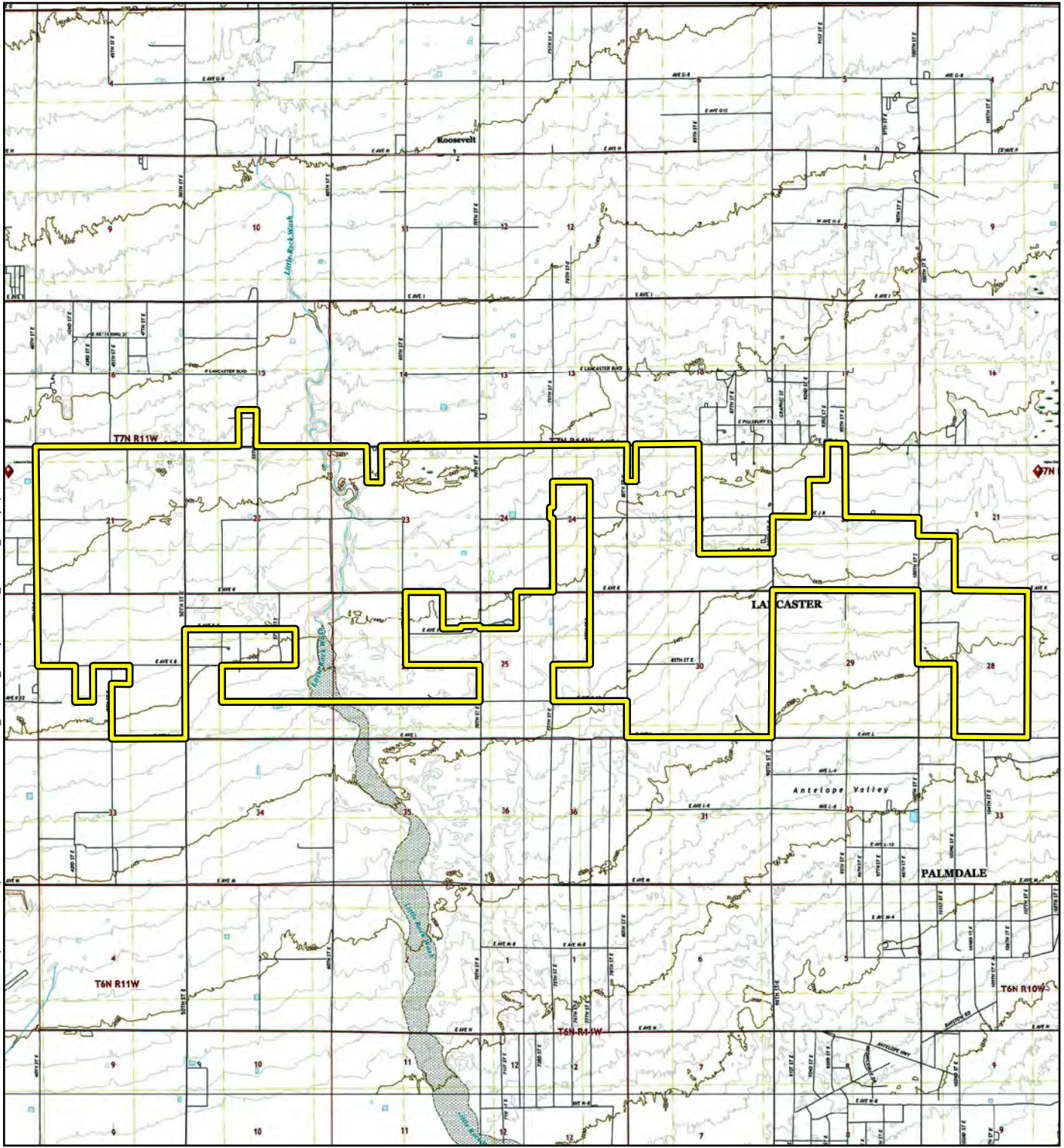


LANCASTER EAST SIDE PROJECT (OVERLAY ZONE)
PRELIMINARY DESKTOP ANALYSIS MEMORANDUM


Regional Vicinity

Figure 1


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Legend

 Project Site

Michael Baker
INTERNATIONAL

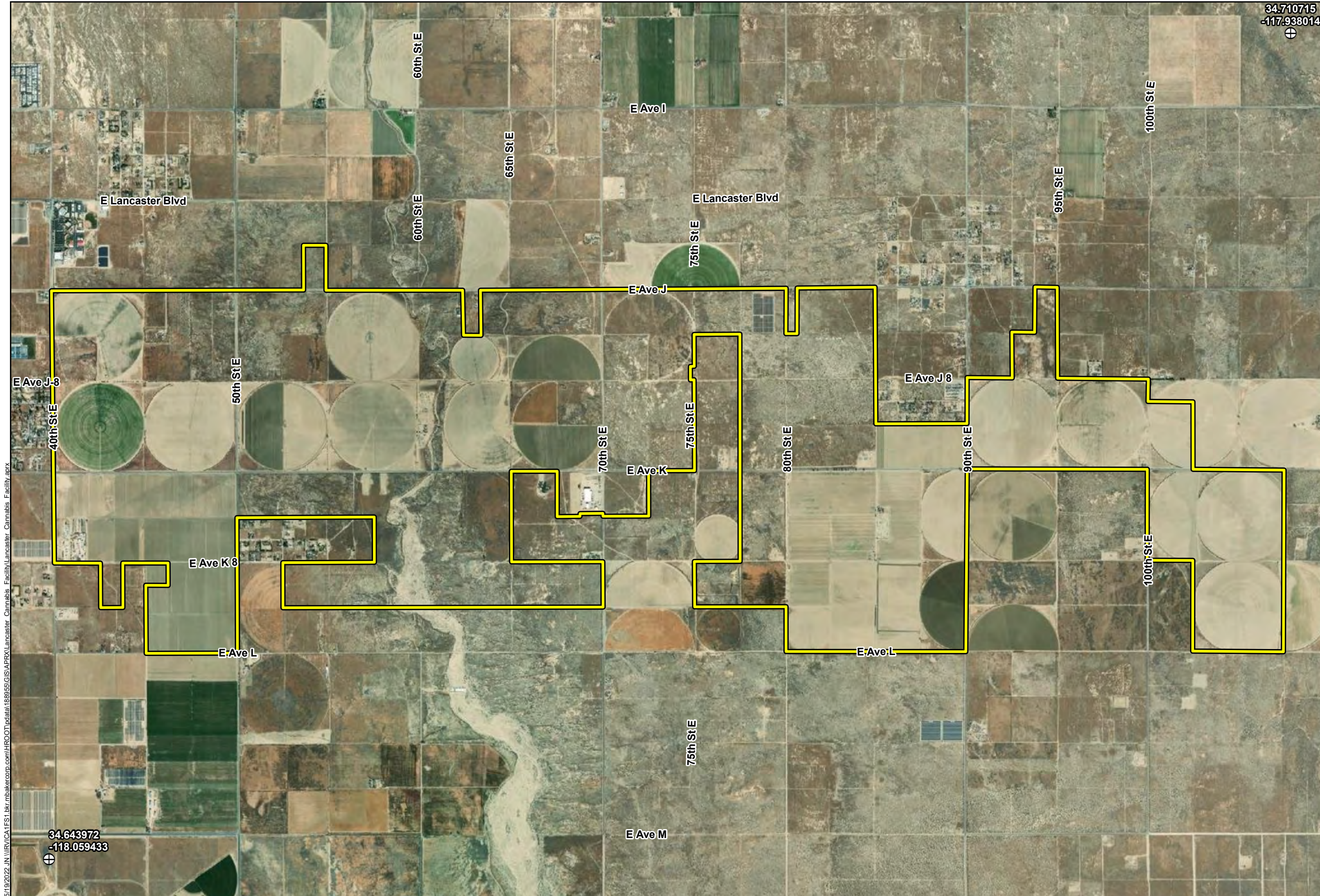


0 0.5 1 Miles

LANCASTER EAST SIDE PROJECT (OVERLAY ZONE)
PRELIMINARY DESKTOP ANALYSIS MEMORANDUM
Project Vicinity

Source: USGS 7.5-Minute topographic quadrangle maps: *Alpine Butte, Little Rock, and Palmdale, California (2021), and Little Rock, California (2022)*

Figure 2

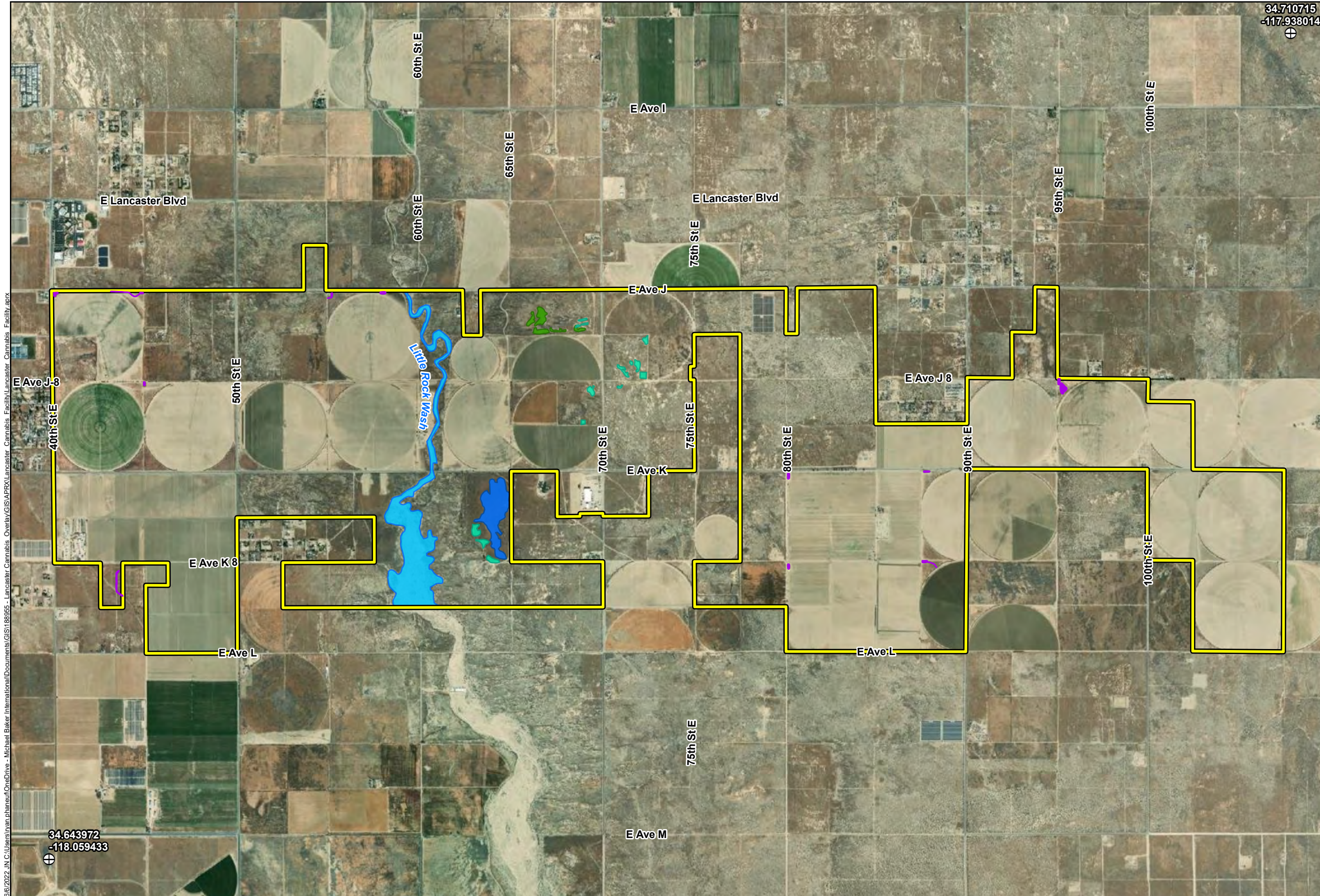


Legend

- Project Site
- Reference Point

0 1,400 2,800 Feet

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Legend

- Project Site
- Potential Aquatic Features

NWI Mapped Features

- Freshwater Forested/ Shrub Wetland
- Freshwater Pond
- Lake
- Riverine

Reference Point

0 1,400 2,800 Feet

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Attachment B

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Attachment C

USDA Custom Soil Resources Report



United States
Department of
Agriculture

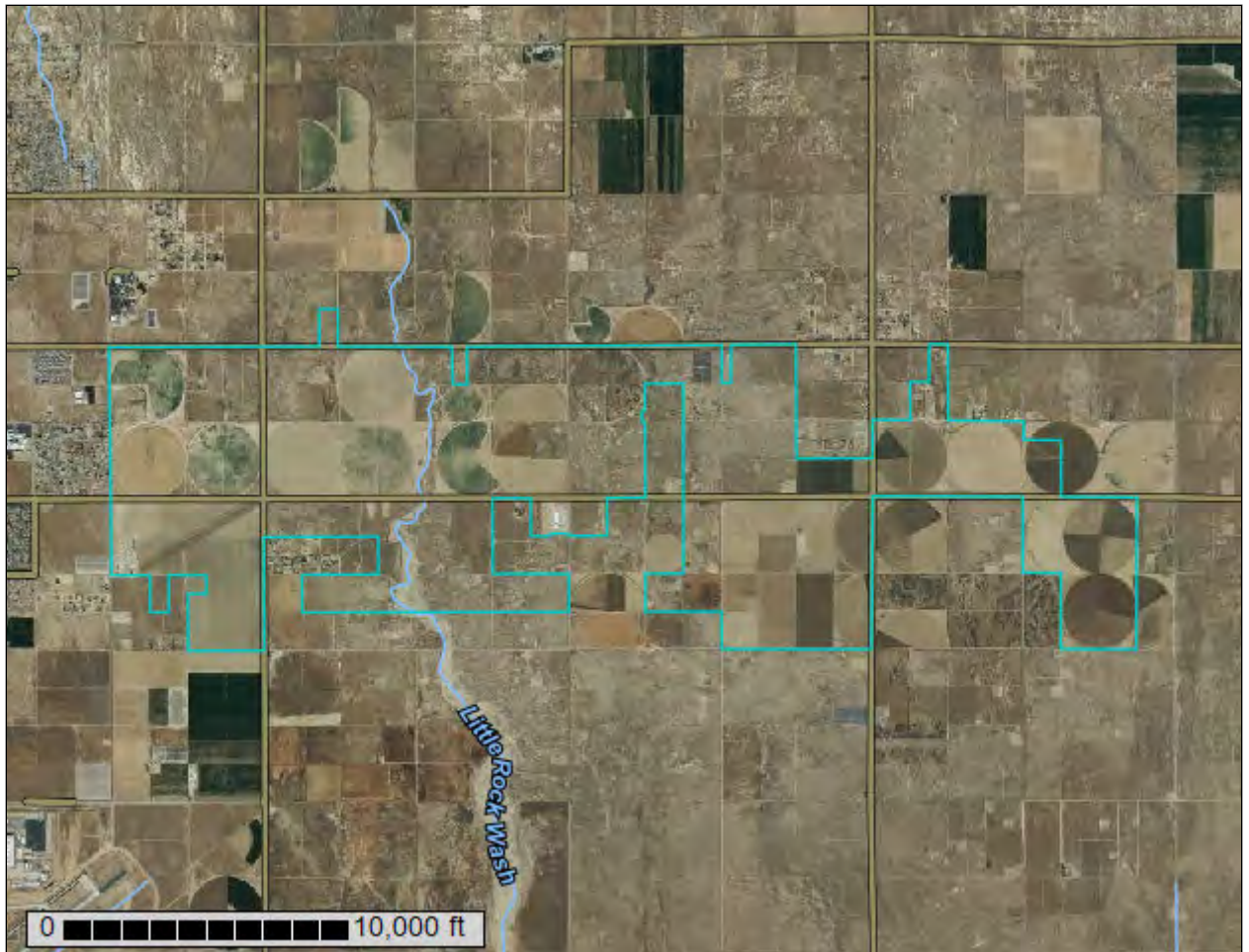
NRCS

Natural
Resources
Conservation
Service

A product of the National
Cooperative Soil Survey,
a joint effort of the United
States Department of
Agriculture and other
Federal agencies, State
agencies including the
Agricultural Experiment
Stations, and local
participants

Custom Soil Resource Report for Antelope Valley Area, California

Lancaster East Side Project (Overlay Zone)



Preface

Soil surveys contain information that affects land use planning in survey areas. They highlight soil limitations that affect various land uses and provide information about the properties of the soils in the survey areas. Soil surveys are designed for many different users, including farmers, ranchers, foresters, agronomists, urban planners, community officials, engineers, developers, builders, and home buyers. Also, conservationists, teachers, students, and specialists in recreation, waste disposal, and pollution control can use the surveys to help them understand, protect, or enhance the environment.

Various land use regulations of Federal, State, and local governments may impose special restrictions on land use or land treatment. Soil surveys identify soil properties that are used in making various land use or land treatment decisions. The information is intended to help the land users identify and reduce the effects of soil limitations on various land uses. The landowner or user is responsible for identifying and complying with existing laws and regulations.

Although soil survey information can be used for general farm, local, and wider area planning, onsite investigation is needed to supplement this information in some cases. Examples include soil quality assessments (<http://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/health/>) and certain conservation and engineering applications. For more detailed information, contact your local USDA Service Center (<https://offices.sc.egov.usda.gov/locator/app?agency=nrcs>) or your NRCS State Soil Scientist (http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/contactus/?cid=nrcs142p2_053951).

Great differences in soil properties can occur within short distances. Some soils are seasonally wet or subject to flooding. Some are too unstable to be used as a foundation for buildings or roads. Clayey or wet soils are poorly suited to use as septic tank absorption fields. A high water table makes a soil poorly suited to basements or underground installations.

The National Cooperative Soil Survey is a joint effort of the United States Department of Agriculture and other Federal agencies, State agencies including the Agricultural Experiment Stations, and local agencies. The Natural Resources Conservation Service (NRCS) has leadership for the Federal part of the National Cooperative Soil Survey.

Information about soils is updated periodically. Updated information is available through the NRCS Web Soil Survey, the site for official soil survey information.

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CcA2—Cajon loamy fine sand, 0 to 2 percent slopes, hummocky.....	17
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HgA—Hesperia loamy fine sand, 0 to 2 percent slopes.....	19
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Rm—Rosamond loamy fine sand.....	24
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How Soil Surveys Are Made

Soil surveys are made to provide information about the soils and miscellaneous areas in a specific area. They include a description of the soils and miscellaneous areas and their location on the landscape and tables that show soil properties and limitations affecting various uses. Soil scientists observed the steepness, length, and shape of the slopes; the general pattern of drainage; the kinds of crops and native plants; and the kinds of bedrock. They observed and described many soil profiles. A soil profile is the sequence of natural layers, or horizons, in a soil. The profile extends from the surface down into the unconsolidated material in which the soil formed or from the surface down to bedrock. The unconsolidated material is devoid of roots and other living organisms and has not been changed by other biological activity.

Currently, soils are mapped according to the boundaries of major land resource areas (MLRAs). MLRAs are geographically associated land resource units that share common characteristics related to physiography, geology, climate, water resources, soils, biological resources, and land uses (USDA, 2006). Soil survey areas typically consist of parts of one or more MLRA.

The soils and miscellaneous areas in a survey area occur in an orderly pattern that is related to the geology, landforms, relief, climate, and natural vegetation of the area. Each kind of soil and miscellaneous area is associated with a particular kind of landform or with a segment of the landform. By observing the soils and miscellaneous areas in the survey area and relating their position to specific segments of the landform, a soil scientist develops a concept, or model, of how they were formed. Thus, during mapping, this model enables the soil scientist to predict with a considerable degree of accuracy the kind of soil or miscellaneous area at a specific location on the landscape.

Commonly, individual soils on the landscape merge into one another as their characteristics gradually change. To construct an accurate soil map, however, soil scientists must determine the boundaries between the soils. They can observe only a limited number of soil profiles. Nevertheless, these observations, supplemented by an understanding of the soil-vegetation-landscape relationship, are sufficient to verify predictions of the kinds of soil in an area and to determine the boundaries.

Soil scientists recorded the characteristics of the soil profiles that they studied. They noted soil color, texture, size and shape of soil aggregates, kind and amount of rock fragments, distribution of plant roots, reaction, and other features that enable them to identify soils. After describing the soils in the survey area and determining their properties, the soil scientists assigned the soils to taxonomic classes (units). Taxonomic classes are concepts. Each taxonomic class has a set of soil characteristics with precisely defined limits. The classes are used as a basis for comparison to classify soils systematically. Soil taxonomy, the system of taxonomic classification used in the United States, is based mainly on the kind and character of soil properties and the arrangement of horizons within the profile. After the soil

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scientists classified and named the soils in the survey area, they compared the individual soils with similar soils in the same taxonomic class in other areas so that they could confirm data and assemble additional data based on experience and research.

The objective of soil mapping is not to delineate pure map unit components; the objective is to separate the landscape into landforms or landform segments that have similar use and management requirements. Each map unit is defined by a unique combination of soil components and/or miscellaneous areas in predictable proportions. Some components may be highly contrasting to the other components of the map unit. The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The delineation of such landforms and landform segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, onsite investigation is needed to define and locate the soils and miscellaneous areas.

Soil scientists make many field observations in the process of producing a soil map. The frequency of observation is dependent upon several factors, including scale of mapping, intensity of mapping, design of map units, complexity of the landscape, and experience of the soil scientist. Observations are made to test and refine the soil-landscape model and predictions and to verify the classification of the soils at specific locations. Once the soil-landscape model is refined, a significantly smaller number of measurements of individual soil properties are made and recorded. These measurements may include field measurements, such as those for color, depth to bedrock, and texture, and laboratory measurements, such as those for content of sand, silt, clay, salt, and other components. Properties of each soil typically vary from one point to another across the landscape.

Observations for map unit components are aggregated to develop ranges of characteristics for the components. The aggregated values are presented. Direct measurements do not exist for every property presented for every map unit component. Values for some properties are estimated from combinations of other properties.

While a soil survey is in progress, samples of some of the soils in the area generally are collected for laboratory analyses and for engineering tests. Soil scientists interpret the data from these analyses and tests as well as the field-observed characteristics and the soil properties to determine the expected behavior of the soils under different uses. Interpretations for all of the soils are field tested through observation of the soils in different uses and under different levels of management. Some interpretations are modified to fit local conditions, and some new interpretations are developed to meet local needs. Data are assembled from other sources, such as research information, production records, and field experience of specialists. For example, data on crop yields under defined levels of management are assembled from farm records and from field or plot experiments on the same kinds of soil.

Predictions about soil behavior are based not only on soil properties but also on such variables as climate and biological activity. Soil conditions are predictable over long periods of time, but they are not predictable from year to year. For example, soil scientists can predict with a fairly high degree of accuracy that a given soil will have a high water table within certain depths in most years, but they cannot predict that a high water table will always be at a specific level in the soil on a specific date.

After soil scientists located and identified the significant natural bodies of soil in the survey area, they drew the boundaries of these bodies on aerial photographs and

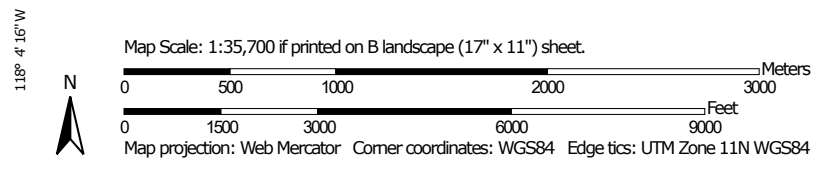
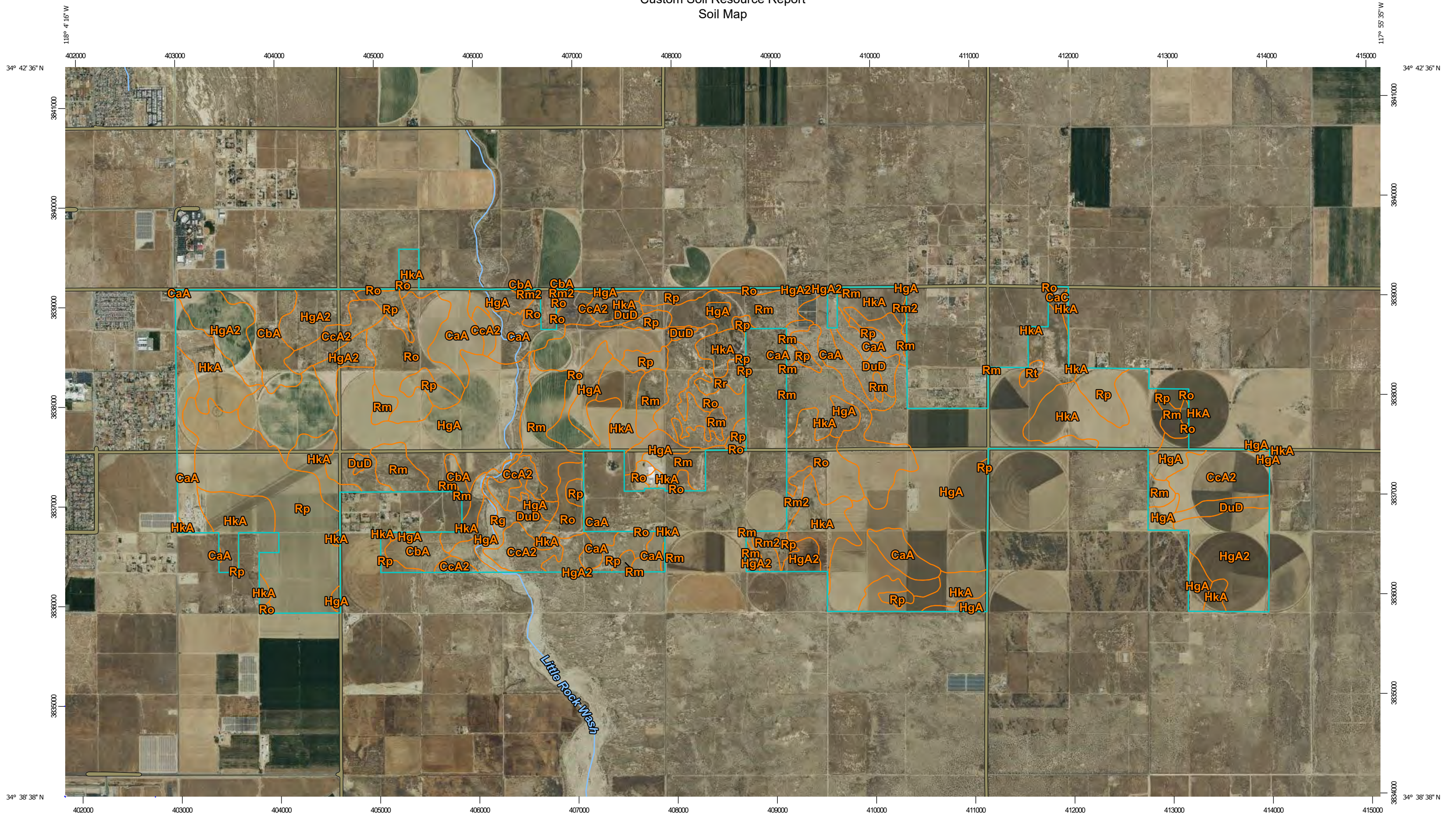
Custom Soil Resource Report

identified each as a specific map unit. Aerial photographs show trees, buildings, fields, roads, and rivers, all of which help in locating boundaries accurately.

Soil Map

The soil map section includes the soil map for the defined area of interest, a list of soil map units on the map and extent of each map unit, and cartographic symbols displayed on the map. Also presented are various metadata about data used to produce the map, and a description of each soil map unit.

Custom Soil Resource Report
Soil Map



MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)




















Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features

-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features

Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

Background

 Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
 Web Soil Survey URL:
 Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Antelope Valley Area, California
 Survey Area Data: Version 14, Sep 13, 2021

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Mar 27, 2021—May 24, 2021

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
CaA	Cajon loamy sand, 0 to 2 percent slopes	412.0	7.1%
CaC	Cajon loamy sand, 2 to 9 percent slopes	8.8	0.2%
CbA	Cajon loamy sand, loamy substratum, 0 to 2 percent slopes	160.9	2.8%
CcA2	Cajon loamy fine sand, 0 to 2 percent slopes, hummocky	310.6	5.3%
DuD	Dune land	122.0	2.1%
HgA	Hesperia loamy fine sand, 0 to 2 percent slopes	1,482.8	25.4%
HgA2	Hesperia loamy fine sand, 0 to 2 percent slopes, hummocky	415.5	7.1%
HkA	Hesperia fine sandy loam, 0 to 2 percent slopes	1,014.6	17.4%
Rg	Riverwash	34.4	0.6%
Rm	Rosamond loamy fine sand	421.4	7.2%
Rm2	Rosamond loamy fine sand, hummocky	43.7	0.7%
Ro	Rosamond fine sandy loam	592.8	10.2%
Rp	Rosamond loam	704.1	12.1%
Rr	Rosamond loam, saline-alkali	106.8	1.8%
Rt	Rosamond silty clay loam	9.3	0.2%
Totals for Area of Interest		5,839.8	100.0%

Map Unit Descriptions

The map units delineated on the detailed soil maps in a soil survey represent the soils or miscellaneous areas in the survey area. The map unit descriptions, along with the maps, can be used to determine the composition and properties of a unit.

A map unit delineation on a soil map represents an area dominated by one or more major kinds of soil or miscellaneous areas. A map unit is identified and named according to the taxonomic classification of the dominant soils. Within a taxonomic class there are precisely defined limits for the properties of the soils. On the landscape, however, the soils are natural phenomena, and they have the characteristic variability of all natural phenomena. Thus, the range of some observed properties may extend beyond the limits defined for a taxonomic class. Areas of soils of a single taxonomic class rarely, if ever, can be mapped without including areas of other taxonomic classes. Consequently, every map unit is made

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up of the soils or miscellaneous areas for which it is named and some minor components that belong to taxonomic classes other than those of the major soils.

Most minor soils have properties similar to those of the dominant soil or soils in the map unit, and thus they do not affect use and management. These are called noncontrasting, or similar, components. They may or may not be mentioned in a particular map unit description. Other minor components, however, have properties and behavioral characteristics divergent enough to affect use or to require different management. These are called contrasting, or dissimilar, components. They generally are in small areas and could not be mapped separately because of the scale used. Some small areas of strongly contrasting soils or miscellaneous areas are identified by a special symbol on the maps. If included in the database for a given area, the contrasting minor components are identified in the map unit descriptions along with some characteristics of each. A few areas of minor components may not have been observed, and consequently they are not mentioned in the descriptions, especially where the pattern was so complex that it was impractical to make enough observations to identify all the soils and miscellaneous areas on the landscape.

The presence of minor components in a map unit in no way diminishes the usefulness or accuracy of the data. The objective of mapping is not to delineate pure taxonomic classes but rather to separate the landscape into landforms or landform segments that have similar use and management requirements. The delineation of such segments on the map provides sufficient information for the development of resource plans. If intensive use of small areas is planned, however, onsite investigation is needed to define and locate the soils and miscellaneous areas.

An identifying symbol precedes the map unit name in the map unit descriptions. Each description includes general facts about the unit and gives important soil properties and qualities.

Soils that have profiles that are almost alike make up a *soil series*. Except for differences in texture of the surface layer, all the soils of a series have major horizons that are similar in composition, thickness, and arrangement.

Soils of one series can differ in texture of the surface layer, slope, stoniness, salinity, degree of erosion, and other characteristics that affect their use. On the basis of such differences, a soil series is divided into *soil phases*. Most of the areas shown on the detailed soil maps are phases of soil series. The name of a soil phase commonly indicates a feature that affects use or management. For example, Alpha silt loam, 0 to 2 percent slopes, is a phase of the Alpha series.

Some map units are made up of two or more major soils or miscellaneous areas. These map units are complexes, associations, or undifferentiated groups.

A *complex* consists of two or more soils or miscellaneous areas in such an intricate pattern or in such small areas that they cannot be shown separately on the maps. The pattern and proportion of the soils or miscellaneous areas are somewhat similar in all areas. Alpha-Beta complex, 0 to 6 percent slopes, is an example.

An *association* is made up of two or more geographically associated soils or miscellaneous areas that are shown as one unit on the maps. Because of present or anticipated uses of the map units in the survey area, it was not considered practical or necessary to map the soils or miscellaneous areas separately. The pattern and relative proportion of the soils or miscellaneous areas are somewhat similar. Alpha-Beta association, 0 to 2 percent slopes, is an example.

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An *undifferentiated group* is made up of two or more soils or miscellaneous areas that could be mapped individually but are mapped as one unit because similar interpretations can be made for use and management. The pattern and proportion of the soils or miscellaneous areas in a mapped area are not uniform. An area can be made up of only one of the major soils or miscellaneous areas, or it can be made up of all of them. Alpha and Beta soils, 0 to 2 percent slopes, is an example.

Some surveys include *miscellaneous areas*. Such areas have little or no soil material and support little or no vegetation. Rock outcrop is an example.

Antelope Valley Area, California

CaA—Cajon loamy sand, 0 to 2 percent slopes

Map Unit Setting

National map unit symbol: hccx
Elevation: 400 to 4,000 feet
Mean annual precipitation: 3 to 9 inches
Mean annual air temperature: 63 to 70 degrees F
Frost-free period: 200 to 300 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Cajon and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Cajon

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 9 inches: loamy sand
H2 - 9 to 60 inches: sand

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Excessively drained
Runoff class: Negligible
Capacity of the most limiting layer to transmit water (Ksat): High to very high (5.95 to 19.98 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 5 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Interpretive groups

Land capability classification (irrigated): 3e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: A
Ecological site: R030XG022CA - SANDY 4-9"
Hydric soil rating: No

Minor Components

Arizo

Percent of map unit: 4 percent

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Hydric soil rating: No

Rosamond

Percent of map unit: 4 percent

Hydric soil rating: No

Hesperia

Percent of map unit: 4 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 3 percent

Landform: Playas

Hydric soil rating: Yes

CaC—Cajon loamy sand, 2 to 9 percent slopes

Map Unit Setting

National map unit symbol: hccy

Elevation: 400 to 4,000 feet

Mean annual precipitation: 3 to 9 inches

Mean annual air temperature: 63 to 70 degrees F

Frost-free period: 200 to 300 days

Farmland classification: Prime farmland if irrigated

Map Unit Composition

Cajon and similar soils: 85 percent

Minor components: 15 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Cajon

Setting

Landform: Alluvial fans

Landform position (two-dimensional): Backslope

Landform position (three-dimensional): Tread

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 9 inches: loamy sand

H2 - 9 to 60 inches: sand

Properties and qualities

Slope: 2 to 9 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Excessively drained

Runoff class: Very low

Capacity of the most limiting layer to transmit water (Ksat): High to very high (5.95 to 19.98 in/hr)

Depth to water table: More than 80 inches

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Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 5 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Interpretive groups

Land capability classification (irrigated): 3e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: A
Ecological site: R030XG022CA - SANDY 4-9"
Hydric soil rating: No

Minor Components

Unnamed

Percent of map unit: 5 percent
Hydric soil rating: No

Arizo

Percent of map unit: 5 percent
Hydric soil rating: No

Hesperia

Percent of map unit: 5 percent
Hydric soil rating: No

CbA—Cajon loamy sand, loamy substratum, 0 to 2 percent slopes

Map Unit Setting

National map unit symbol: hccz
Elevation: 1,800 to 2,800 feet
Mean annual precipitation: 4 to 9 inches
Mean annual air temperature: 66 degrees F
Frost-free period: 240 to 260 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Cajon and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Cajon

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

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Typical profile

H1 - 0 to 9 inches: loamy sand
H2 - 9 to 30 inches: sand
H3 - 30 to 60 inches: stratified sand to clay loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Excessively drained
Runoff class: Very low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high
(0.57 to 1.98 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 5 percent
Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)
Available water supply, 0 to 60 inches: Low (about 5.4 inches)

Interpretive groups

Land capability classification (irrigated): 2e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: B
Ecological site: R030XG022CA - SANDY 4-9"
Hydric soil rating: No

Minor Components

Unnamed

Percent of map unit: 10 percent
Hydric soil rating: No

Cajon

Percent of map unit: 4 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent
Landform: Playas
Hydric soil rating: Yes

CcA2—Cajon loamy fine sand, 0 to 2 percent slopes, hummocky

Map Unit Setting

National map unit symbol: hcd0
Elevation: 400 to 4,000 feet
Mean annual precipitation: 3 to 9 inches
Mean annual air temperature: 63 to 70 degrees F
Frost-free period: 200 to 300 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Cajon and similar soils: 85 percent

Minor components: 15 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Cajon

Setting

Landform: Alluvial fans

Landform position (two-dimensional): Backslope

Landform position (three-dimensional): Tread

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 9 inches: loamy fine sand

H2 - 9 to 60 inches: sand

Properties and qualities

Slope: 0 to 2 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Excessively drained

Runoff class: Negligible

Capacity of the most limiting layer to transmit water (Ksat): High to very high (5.95 to 19.98 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 5 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 7e

Hydrologic Soil Group: A

Ecological site: R030XG022CA - SANDY 4-9"

Hydric soil rating: No

Minor Components

Dune land

Percent of map unit: 10 percent

Hydric soil rating: No

Hesperia

Percent of map unit: 5 percent

Hydric soil rating: No

DuD—Dune land

Map Unit Composition

Dune land: 90 percent

Minor components: 10 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Dune Land

Setting

Landform: Hills

Landform position (two-dimensional): Backslope

Landform position (three-dimensional): Side slope

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Eolian sands

Typical profile

H1 - 0 to 6 inches: fine sand

H2 - 6 to 60 inches: sand

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 8

Hydrologic Soil Group: A

Hydric soil rating: No

Minor Components

Unnamed

Percent of map unit: 10 percent

Hydric soil rating: No

HgA—Hesperia loamy fine sand, 0 to 2 percent slopes

Map Unit Setting

National map unit symbol: hcf9

Elevation: 200 to 4,000 feet

Mean annual precipitation: 6 to 9 inches

Mean annual air temperature: 61 to 70 degrees F

Frost-free period: 225 to 310 days

Farmland classification: Prime farmland if irrigated

Map Unit Composition

Hesperia and similar soils: 85 percent

Minor components: 15 percent

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Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Hesperia

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 8 inches: loamy fine sand
H2 - 8 to 54 inches: fine sandy loam
H3 - 54 to 77 inches: sandy loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Very low
Capacity of the most limiting layer to transmit water (Ksat): High (1.98 to 5.95 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 10 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Moderate (about 7.7 inches)

Interpretive groups

Land capability classification (irrigated): 2e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: A
Ecological site: R030XG022CA - SANDY 4-9"
Hydric soil rating: No

Minor Components

Unnamed

Percent of map unit: 9 percent
Hydric soil rating: No

Greenfield

Percent of map unit: 5 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent
Landform: Playas
Hydric soil rating: Yes

HgA2—Hesperia loamy fine sand, 0 to 2 percent slopes, hummocky

Map Unit Setting

National map unit symbol: hcfb
Elevation: 200 to 4,000 feet
Mean annual precipitation: 6 to 9 inches
Mean annual air temperature: 61 to 70 degrees F
Frost-free period: 225 to 310 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Hesperia and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Hesperia

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 8 inches: loamy fine sand
H2 - 8 to 54 inches: fine sandy loam
H3 - 54 to 77 inches: sandy loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Very low
Capacity of the most limiting layer to transmit water (Ksat): High (1.98 to 5.95 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 10 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: Moderate (about 7.7 inches)

Interpretive groups

Land capability classification (irrigated): 2e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: A
Ecological site: R030XG022CA - SANDY 4-9"
Hydric soil rating: No

Minor Components

Unnamed

Percent of map unit: 9 percent
Hydric soil rating: No

Dune land

Percent of map unit: 5 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent
Landform: Playas
Hydric soil rating: Yes

HkA—Hesperia fine sandy loam, 0 to 2 percent slopes

Map Unit Setting

National map unit symbol: hcfd
Elevation: 200 to 4,000 feet
Mean annual precipitation: 6 to 9 inches
Mean annual air temperature: 61 to 70 degrees F
Frost-free period: 225 to 310 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Hesperia and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Hesperia

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 4 inches: fine sandy loam
H2 - 4 to 54 inches: fine sandy loam
H3 - 54 to 77 inches: sandy loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Very low

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Capacity of the most limiting layer to transmit water (Ksat): High (1.98 to 5.95 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 10 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Available water supply, 0 to 60 inches: Moderate (about 8.0 inches)

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 7e

Hydrologic Soil Group: A

Ecological site: R030XG021CA - LOAMY 4-9"

Hydric soil rating: No

Minor Components

Cajon

Percent of map unit: 5 percent

Hydric soil rating: No

Rosamond

Percent of map unit: 5 percent

Hydric soil rating: No

Tray

Percent of map unit: 3 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 2 percent

Landform: Playas

Hydric soil rating: Yes

Rg—Riverwash

Map Unit Composition

Riverwash: 85 percent

Minor components: 15 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Riverwash

Setting

Landform: Drainageways

Landform position (two-dimensional): Footslope

Landform position (three-dimensional): Tread

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Alluvium

Custom Soil Resource Report

Typical profile

H1 - 0 to 6 inches: sand

H2 - 6 to 60 inches: stratified coarse sand to sandy loam

Properties and qualities

Slope: 0 to 2 percent

Drainage class: Excessively drained

Runoff class: Negligible

Capacity of the most limiting layer to transmit water (Ksat): High to very high (5.95 to 19.98 in/hr)

Depth to water table: About 0 inches

Available water supply, 0 to 60 inches: Very low (about 2.9 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 8

Hydrologic Soil Group: A

Ecological site: R019XG905CA - Riparian

Hydric soil rating: Yes

Minor Components

Sandy alluvial land

Percent of map unit: 10 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 5 percent

Hydric soil rating: No

Rm—Rosamond loamy fine sand

Map Unit Setting

National map unit symbol: hcgv

Elevation: 1,900 to 2,900 feet

Mean annual precipitation: 3 to 8 inches

Mean annual air temperature: 61 to 64 degrees F

Frost-free period: 240 to 260 days

Farmland classification: Prime farmland if irrigated

Map Unit Composition

Rosamond and similar soils: 85 percent

Minor components: 15 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Rosamond

Setting

Landform: Alluvial fans

Landform position (two-dimensional): Backslope

Landform position (three-dimensional): Tread

Down-slope shape: Linear

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Across-slope shape: Linear

Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 15 inches: loamy fine sand

H2 - 15 to 60 inches: stratified loam to silty clay loam

Properties and qualities

Slope: 0 to 2 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Low

Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high
(0.57 to 1.98 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 10 percent

Maximum salinity: Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)

Available water supply, 0 to 60 inches: Moderate (about 9.0 inches)

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 7e

Hydrologic Soil Group: B

Ecological site: R030XG022CA - SANDY 4-9"

Hydric soil rating: No

Minor Components

Hesperia

Percent of map unit: 10 percent

Hydric soil rating: No

Cajon

Percent of map unit: 4 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent

Landform: Playas

Hydric soil rating: Yes

Rm2—Rosamond loamy fine sand, hummocky

Map Unit Setting

National map unit symbol: hcgw

Elevation: 1,900 to 2,900 feet

Mean annual precipitation: 3 to 8 inches

Mean annual air temperature: 61 to 64 degrees F

Frost-free period: 240 to 260 days

Farmland classification: Prime farmland if irrigated

Map Unit Composition

Rosamond and similar soils: 85 percent

Minor components: 15 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Rosamond

Setting

Landform: Alluvial fans

Landform position (two-dimensional): Backslope

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 15 inches: loamy fine sand

H2 - 15 to 60 inches: stratified loam to silty clay loam

Properties and qualities

Slope: 0 to 2 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Low

*Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high
(0.57 to 1.98 in/hr)*

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 10 percent

Maximum salinity: Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)

Available water supply, 0 to 60 inches: Moderate (about 9.0 inches)

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 7e

Hydrologic Soil Group: B

Ecological site: R030XG022CA - SANDY 4-9"

Hydric soil rating: No

Minor Components

Cajon

Percent of map unit: 5 percent

Hydric soil rating: No

Dune land

Percent of map unit: 5 percent

Hydric soil rating: No

Hesperia

Percent of map unit: 4 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent

Landform: Playas

Hydric soil rating: Yes

Ro—Rosamond fine sandy loam

Map Unit Setting

National map unit symbol: hcgy
Elevation: 1,900 to 2,900 feet
Mean annual precipitation: 3 to 8 inches
Mean annual air temperature: 61 to 64 degrees F
Frost-free period: 240 to 260 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Rosamond and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Rosamond

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 8 inches: fine sandy loam
H2 - 8 to 60 inches: stratified loam to silty clay loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high
(0.57 to 1.98 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: Rare
Frequency of ponding: None
Calcium carbonate, maximum content: 10 percent
Maximum salinity: Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)
Available water supply, 0 to 60 inches: High (about 9.9 inches)

Interpretive groups

Land capability classification (irrigated): 1
Land capability classification (nonirrigated): 7c
Hydrologic Soil Group: B
Ecological site: R030XG021CA - LOAMY 4-9"
Hydric soil rating: No

Minor Components

Cajon

Percent of map unit: 10 percent
Hydric soil rating: No

Hesperia

Percent of map unit: 4 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent
Landform: Playas
Hydric soil rating: Yes

Rp—Rosamond loam

Map Unit Setting

National map unit symbol: hcgz
Elevation: 1,900 to 2,900 feet
Mean annual precipitation: 3 to 8 inches
Mean annual air temperature: 61 to 64 degrees F
Frost-free period: 240 to 260 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Rosamond and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Rosamond

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 8 inches: loam
H2 - 8 to 60 inches: stratified loam to silty clay loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high
(0.57 to 1.98 in/hr)

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Depth to water table: More than 80 inches
Frequency of flooding: Rare
Frequency of ponding: None
Calcium carbonate, maximum content: 10 percent
Maximum salinity: Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)
Available water supply, 0 to 60 inches: High (about 10.0 inches)

Interpretive groups

Land capability classification (irrigated): 1
Land capability classification (nonirrigated): 7c
Hydrologic Soil Group: B
Ecological site: R030XG021CA - LOAMY 4-9"
Hydric soil rating: No

Minor Components

Cajon

Percent of map unit: 5 percent
Hydric soil rating: No

Hesperia

Percent of map unit: 5 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 4 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent
Landform: Playas
Hydric soil rating: Yes

Rr—Rosamond loam, saline-alkali

Map Unit Setting

National map unit symbol: hch0
Elevation: 1,900 to 2,900 feet
Mean annual precipitation: 3 to 8 inches
Mean annual air temperature: 61 to 64 degrees F
Frost-free period: 200 to 260 days
Farmland classification: Farmland of statewide importance

Map Unit Composition

Rosamond and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Rosamond

Setting

Landform: Alluvial fans

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Landform position (two-dimensional): Backslope

Landform position (three-dimensional): Tread

Down-slope shape: Linear

Across-slope shape: Linear

Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 60 inches: stratified loam to silty clay loam

Properties and qualities

Slope: 0 to 2 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Medium

Capacity of the most limiting layer to transmit water (Ksat): Moderately high (0.20 to 0.57 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: Rare

Frequency of ponding: None

Calcium carbonate, maximum content: 10 percent

Maximum salinity: Slightly saline to strongly saline (4.0 to 16.0 mmhos/cm)

Sodium adsorption ratio, maximum: 10.0

Available water supply, 0 to 60 inches: Low (about 5.3 inches)

Interpretive groups

Land capability classification (irrigated): 3s

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: C

Ecological site: R030XG020CA - ALKALI FLATS 4-9"

Hydric soil rating: No

Minor Components

Tray

Percent of map unit: 5 percent

Hydric soil rating: No

Pond

Percent of map unit: 5 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 4 percent

Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent

Landform: Playas

Hydric soil rating: Yes

Rt—Rosamond silty clay loam

Map Unit Setting

National map unit symbol: hch2
Elevation: 1,900 to 2,900 feet
Mean annual precipitation: 3 to 8 inches
Mean annual air temperature: 61 to 64 degrees F
Frost-free period: 240 to 260 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Rosamond and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Rosamond

Setting

Landform: Alluvial fans
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from granite

Typical profile

H1 - 0 to 12 inches: silty clay loam
H2 - 12 to 60 inches: stratified loam to silty clay loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high
(0.57 to 1.98 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 10 percent
Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)
Available water supply, 0 to 60 inches: High (about 10.3 inches)

Interpretive groups

Land capability classification (irrigated): 1
Land capability classification (nonirrigated): 7c
Hydrologic Soil Group: B
Ecological site: R030XG021CA - LOAMY 4-9"
Hydric soil rating: No

Minor Components

Cajon

Percent of map unit: 10 percent
Hydric soil rating: No

Hesperia

Percent of map unit: 4 percent
Hydric soil rating: No

Unnamed

Percent of map unit: 1 percent
Landform: Playas
Hydric soil rating: Yes

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Custom Soil Resource Report

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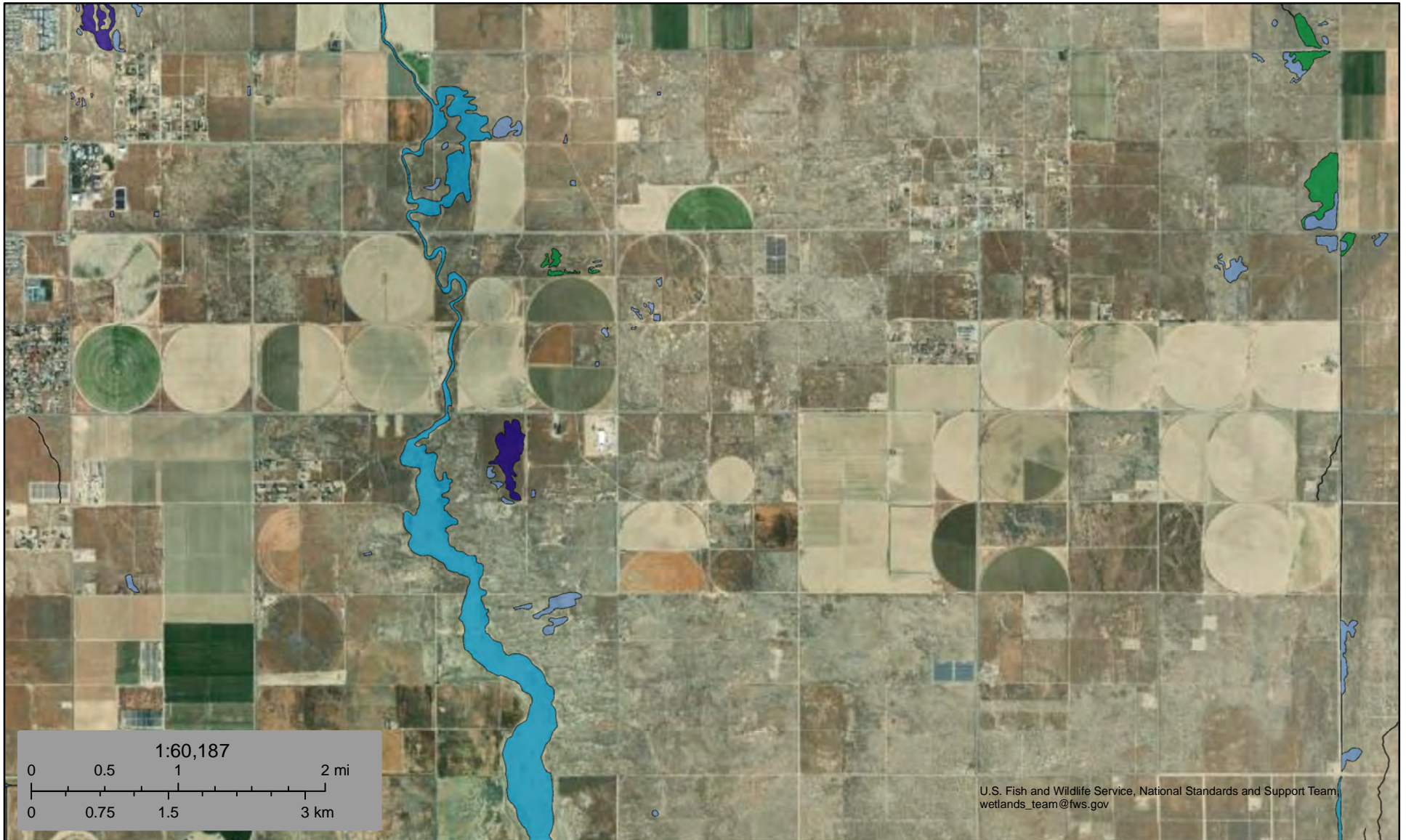
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Attachment D

USFWS National Wetlands Inventory Map



Lancaster East Side Project (Overlay Zone)



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

May 20, 2022

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



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.

CULTURAL AND PALEONTOLOGICAL RESOURCES ASSESSMENT

**Lancaster Eastside Project
Lancaster, Los Angeles County, California**

*Prepared for:
City of Lancaster
44933 Fern Avenue
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 40 th 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.

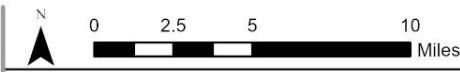
The Cannabis Facility is the only site-specific cannabis facility to be analyzed at a project level of detail in the EIR. Additional future proposed cannabis facilities within the Overlay Zone would be analyzed under a separate, stand-alone CEQA document at the time such development application(s) are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



★ Project Location

LANCASTER EAST SIDE PROJECT

Michael Baker INTERNATIONAL

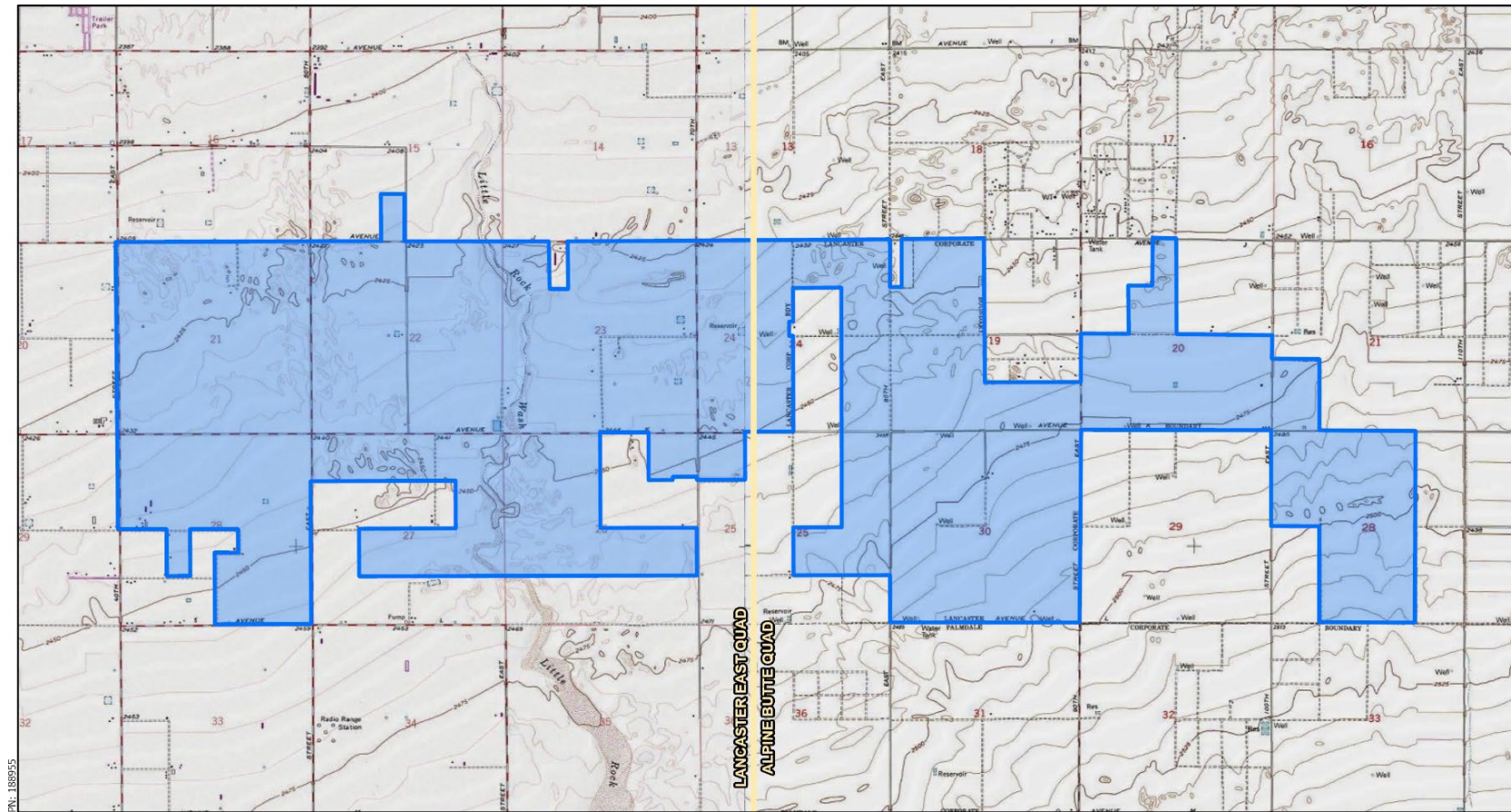


Source: Esri, ArcGIS Online, National Geographic World Map: Lancaster, California

Regional Vicinity

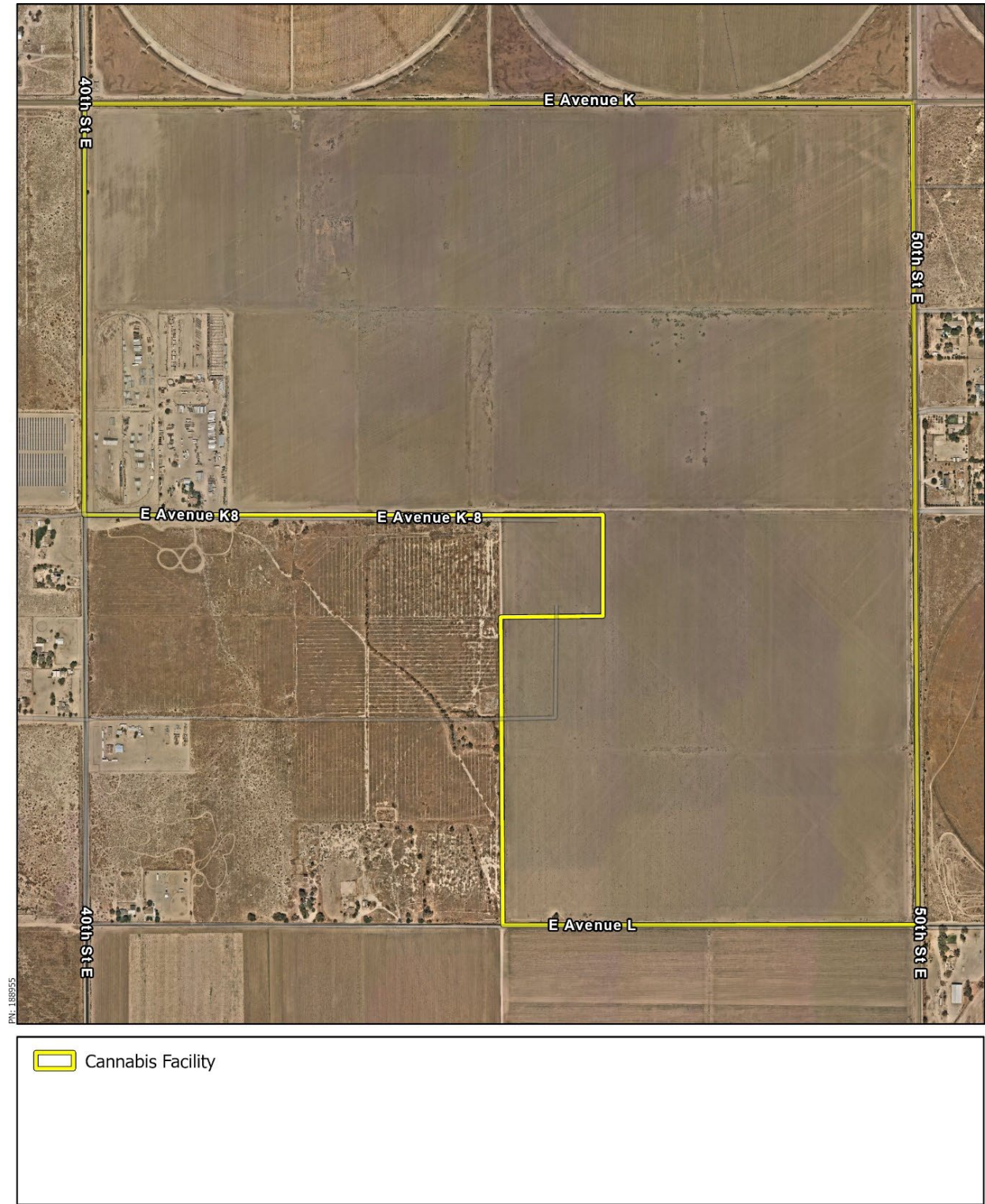
Figure 1

Michael Baker INTERNATIONAL



 Light Industrial Overlay Zone

LANCASTER EAST / ALPINE BUTTE USGS 7.5-MINUTE TOPO QUAD



LANCASTER EAST SIDE PROJECT

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 (Qf₁, 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. Cattle 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

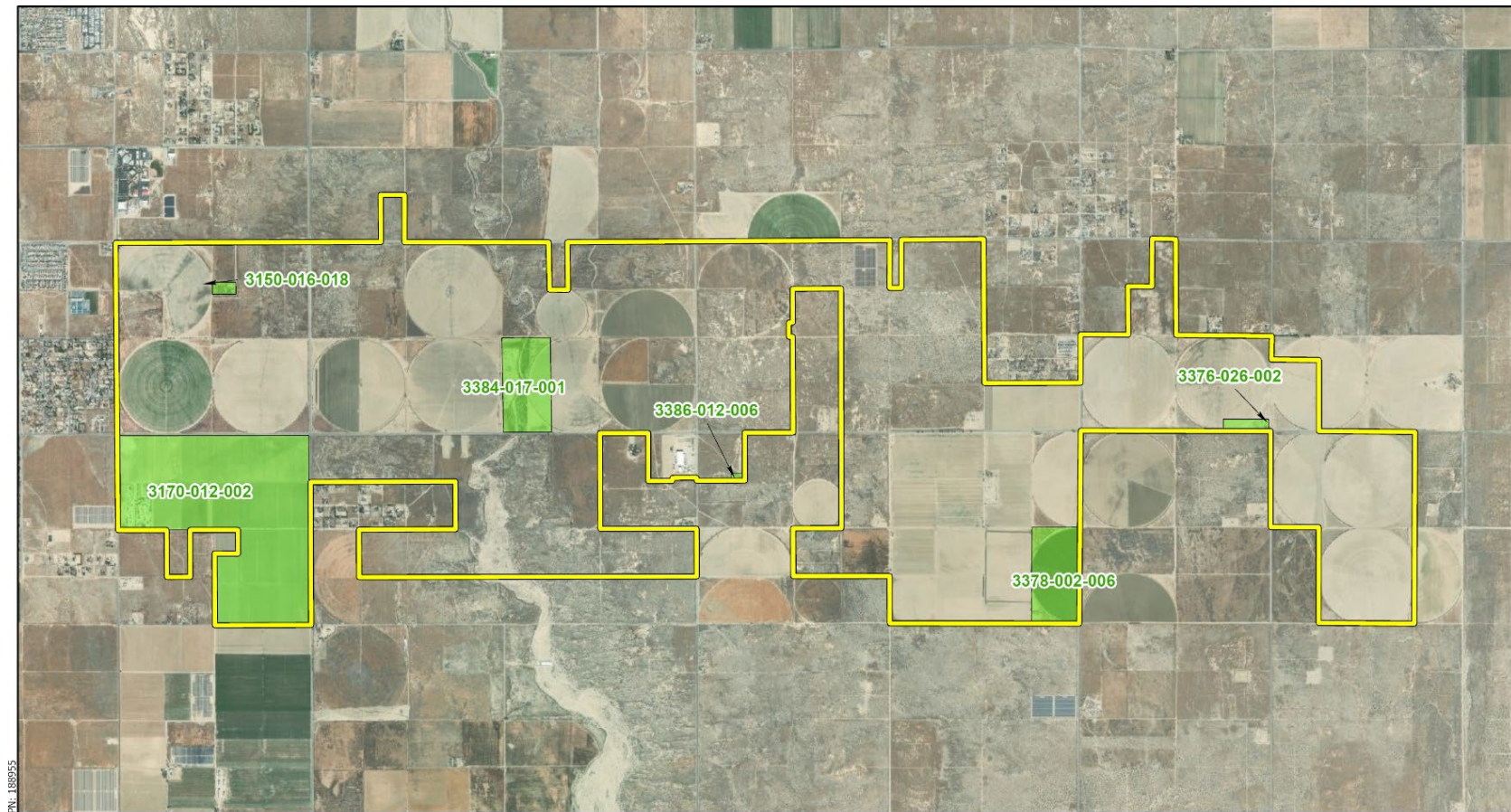
Parcel data provided by the Los Angeles County Assessor’s Office identified six parcels (excluding state land) within the Overlay Zone that are of historic age (>45 years old) (**Table 5**). Parcel built date data is incomplete and this list likely does not include all historic-aged buildings in the 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.

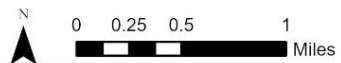
**Evaluated as a part of this study.



 Parcels Over 45 Years of Age

 Overlay Zone

LANCASTER EAST SIDE PROJECT



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 refuse 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 Section 15064.5(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 dovescotes. 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 40 th 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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_____. 1917. *Elizabeth Lake, Calif.*, 1:250,000 scale topographic quadrangle.

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_____. 1930b. *West Alpine Butte, Calif.*, 1:24,000 scale topographic quadrangle.

_____. 1933a. *Tierra Bonita, Calif.*, 1:24,000 scale topographic quadrangle.

_____. 1933b. *West Alpine Butte, Calif.*, 1:24,000 scale topographic quadrangle.

_____. 1945. *Alpine Butte, Calif.*, 1:62,500 scale topographic quadrangle.

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_____. 1958b. *Lancaster, Calif.*, 1:24,000 scale topographic quadrangle.

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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 (<i>Camelops hesternus</i>) Rabbit (<i>Sylvagus</i>), camel family (Camelidae), antelope squirrel (<i>Ammospermophilus</i>), kangaroo rat (<i>Dipodomys</i>), pocket mouse (<i>Perognathus</i>), pack rat (<i>Neotoma</i>), deer mouse (<i>Peromyscus</i>), vole family (Microtinae), iguana (<i>Dipsosaurus</i>), pocket gopher (<i>Thomomys</i>), spiny lizard (<i>Sceloporus</i>), side blotched lizard (<i>Uta</i>), colubrid snakes (<i>Trimorphodon</i> , <i>Masticophis</i> , <i>Phyllorhynchus</i>), night lizard (<i>Xantusia</i>), western alligator lizard (<i>Elgaria</i>), toothy skinks	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)		3-11 feet bgs

			(<i>Plestiodon</i>), whiptail lizard (<i>Aspidocelis</i>), 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 (<i>Lampropeltis</i>), Lizard (Lacertilia), leopard lizard (<i>Gambelia</i>); snake (Ophidia), gopher snake (<i>Pituophis</i>); rabbit (<i>Lagomorpha</i>), rodent (Rodentia), Pocket gopher (<i>Thomomys</i>), pocket mouse (<i>Chaetodippus</i>), kangaroo rat (<i>Dipodomys</i>); 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) Alluvium (Pleistocene, moderately indurated fine to medium grained silty sandstone)	Camel (<i>Hemiauchenia</i>)	21 feet bgs
LACM VP 7786	Southern California Logistics Airport		Vole (<i>Microtus mexicanus</i>)	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

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:



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

PARLIAMENTARIAN
Russell Attebery
Karuk

SECRETARY
Sara Dutschke
Miwok

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

COMMISSIONER
Wayne Nelson
Luiseño

COMMISSIONER
Stanley Rodriguez
Kumeyaay

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok/Nisenan

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

- 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
San Fernando, CA, 91340
Phone: (818) 837 - 0794
Fax: (818) 837-0796
jairo.avila@tataviam-nsn.us

Tataviam

Quechan Tribe of the Fort Yuma Reservation

Jill McCormick, Historic Preservation Officer
P.O. Box 1899
Yuma, AZ, 85366
Phone: (760) 572 - 2423
historicpreservation@quechantribe.com

Quechan

Fernandeno Tataviam Band of Mission Indians

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

Tataviam

San Fernando Band of Mission Indians

Donna Yocum, Chairperson
P.O. Box 221838
Newhall, CA, 91322
Phone: (503) 539 - 0933
Fax: (503) 574-3308
ddyocum@comcast.net

Kitanemuk
Vanyume
Tataviam

Kern Valley Indian Community

Robert Robinson, Chairperson
P.O. Box 1010
Lake Isabella, CA, 93240
Phone: (760) 378 - 2915
bbutterbredt@gmail.com

Kawaiisu
Tubatulabal
Koso

San Manuel Band of Mission Indians

Jessica Mauck, Director of Cultural Resources
26569 Community Center Drive
Highland, CA, 92346
Phone: (909) 864 - 8933
Jessica.Mauck@sanmanuel-nsn.gov

Serrano

Morongo Band of Mission Indians

Robert Martin, Chairperson
12700 Pumarra Road
Banning, CA, 92220
Phone: (951) 755 - 5110
Fax: (951) 755-5177
abrierty@morongo-nsn.gov

Cahuilla
Serrano

Serrano Nation of Mission Indians

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

Serrano

Morongo Band of Mission Indians

Ann Brierty, THPO
12700 Pumarra Road
Banning, CA, 92220
Phone: (951) 755 - 5259
Fax: (951) 572-6004
abrierty@morongo-nsn.gov

Cahuilla
Serrano

Serrano Nation of Mission Indians

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

Serrano

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

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.

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.mbakertnl.com     

Attachments:

Attachment 1 - Figure 1: Regional Vicinity Map

Attachment 2 - Figure 2: Light Industrial Overlay Zone Map

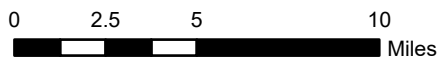
Attachment 3 - Figure 3: Cannabis Facility Map



 Project Location

LANCASTER EAST SIDE PROJECT

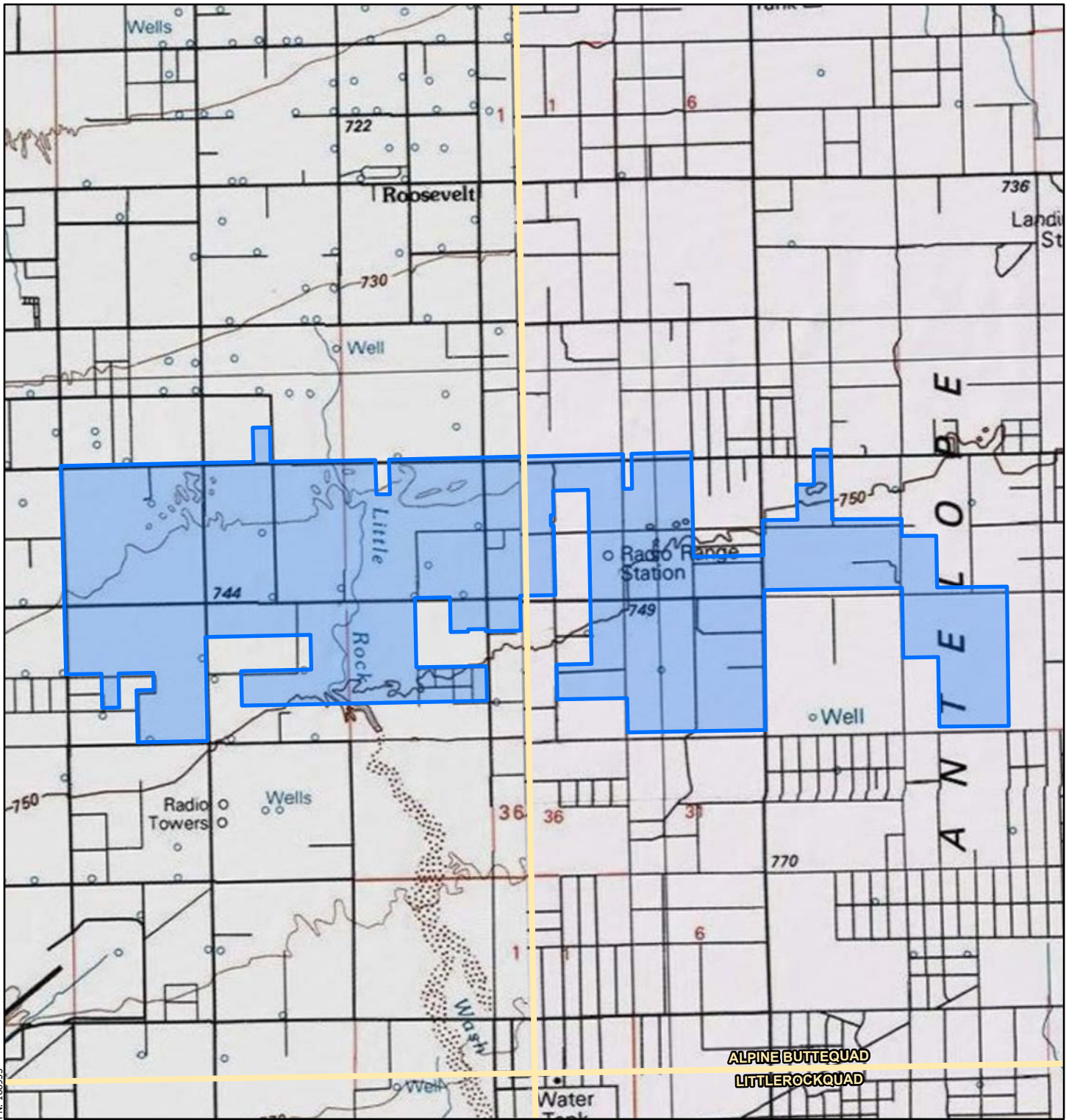
Michael Baker
INTERNATIONAL



Regional Vicinity

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

Figure 1



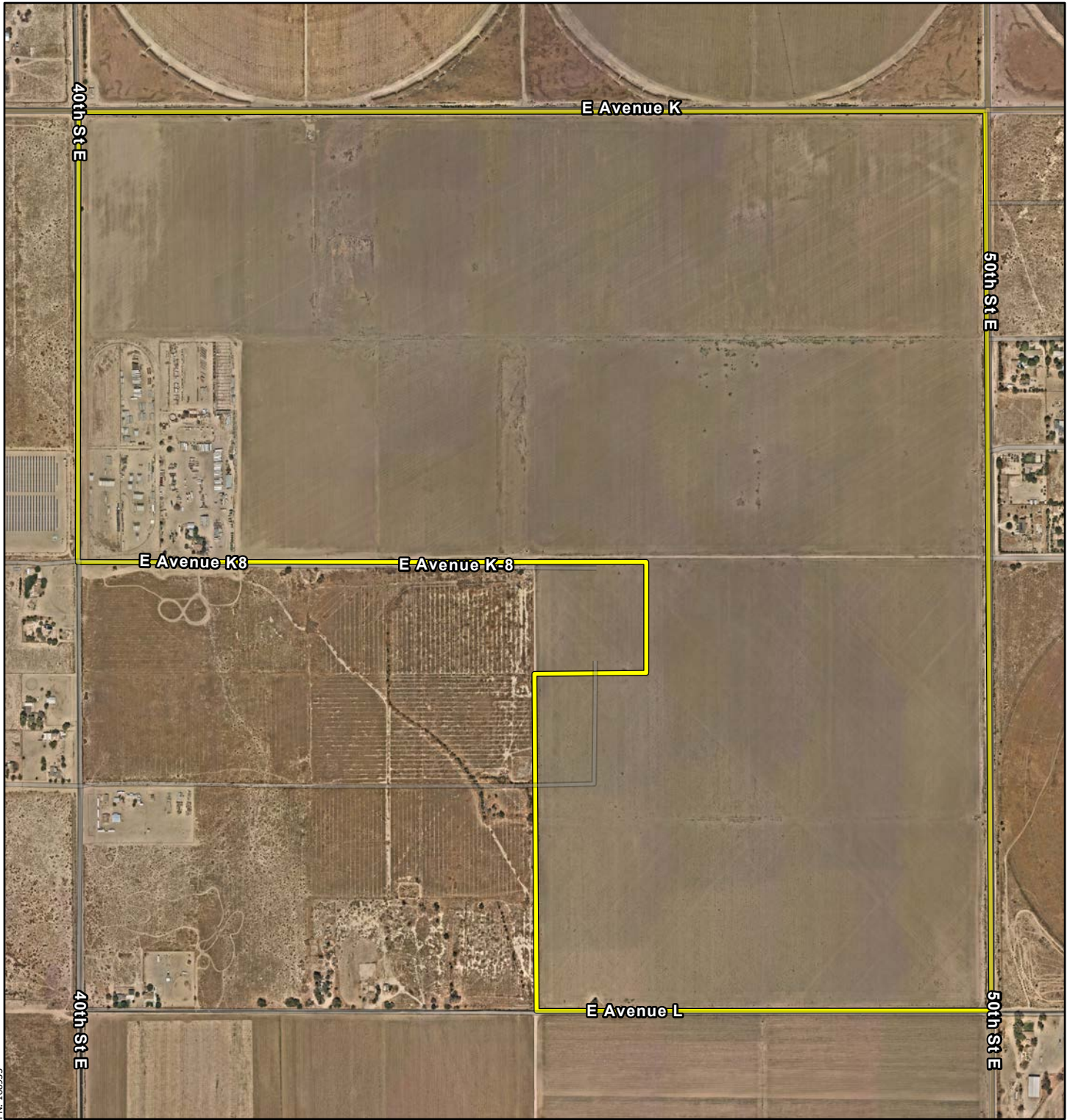
PN: 168955

 Light Industrial Overlay Zone


LANCASTER EAST / ALPINE BUTTE USGS 7.5-MINUTE TOPO QUAD

ALPINE BUTTE QUAD
LITTLE ROCK QUAD

LANCASTER EAST SIDE PROJECT



PN: 188955

 Cannabis Facility

LANCASTER EAST SIDE PROJECT

Michael Baker
INTERNATIONAL



0 250 500 1,000
Feet

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

Cannabis Facility

Figure 3

Appendix D
South Central Coastal
Information Center
Records Search Results
(Confidential)

Appendix E
DPR Forms
(Confidential)

Appendix F
Map: Archaeological
Resources within the
Overlay Zone
(Confidential)



R. REX PARRIS
MAYOR

MARVIN CRIST
VICE MAYOR

DARRELL DORRIS
COUNCIL MEMBER

RAJ MAHLI
COUNCIL MEMBER

KEN MANN
COUNCIL MEMBER

JASON CAUDLE
CITY MANAGER

44933 Fern Avenue
Lancaster, CA 93534
661.723.6000
cityoflanasterca.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 make up 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@cityoflancafterca.gov.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'CC', is positioned above the typed name.

Cynthia Campana
Senior Planner
City of Lancaster

Enclosure: Project Vicinity Map



R. REX PARRIS
MAYOR

MARVIN CRIST
VICE MAYOR

DARRELL DORRIS
COUNCIL MEMBER

RAJ MAHLI
COUNCIL MEMBER

KEN MANN
COUNCIL MEMBER

JASON CAUDLE
CITY MANAGER

44933 Fern Avenue
Lancaster, CA 93534
661.723.6000
cityoflancafterca.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 make up the "project site." The two project components are described in further detail below:

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Cannabis Facility

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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@cityoflancafterca.gov.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Campana', with a stylized flourish at the end.

Cynthia Campana
Senior Planner
City of Lancaster

Enclosure: Project Vicinity Map



R. REX PARRIS
MAYOR

MARVIN CRIST
VICE MAYOR

DARRELL DORRIS
COUNCIL MEMBER

RAJ MAHLI
COUNCIL MEMBER

KEN MANN
COUNCIL MEMBER

JASON CAUDLE
CITY MANAGER

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 make up 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@cityoflancafterca.gov.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read 'CC', with a long horizontal flourish extending to the right.

Cynthia Campana
Senior Planner
City of Lancaster

Enclosure: Project Vicinity Map



11.4 VMT Analysis

Technical Memorandum

March 21, 2023

To: Matt Simons, City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

From: Jordan Gray PE TE, Michael Baker International
Dawn Wilson PE TE, Michael Baker International

CC: Alan Ashimine, Michael Baker International

Subject: East Side Overlay Zone Programmatic VMT Assessment

Introduction

The purpose of this technical memorandum is to provide a programmatic level Vehicle Miles Travelled (VMT) assessment for the East Side Overlay Zone (Overlay Zone) located in the City of Lancaster, California to evaluate potential transportation impacts under California Environmental Quality Act (CEQA) process. This assessment considers the land use modifications associated with the proposed Overlay Zone compared to the currently adopted General Plan.

This analysis has been prepared consistent with City guidelines and thresholds of significance as outlined in the *Transportation Analysis Updates in Lancaster* (May 2020) and the *City's Local Transportation Assessment Guidelines* (January 2021).

Project Description

The City is proposing to establish an Overlay Zone in the eastern portion of the city in response to interest in developing industrial uses in this area. The Overlay Zone encompasses approximately 5,841 acres 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 Overlay Zone consists of scattered areas of rural development predominantly surrounded by agricultural use and approximately 2,286 acres of vacant, undeveloped land. **Exhibit 1 in Attachment A** shows the boundary of the Overlay Zone.

The Overlay Zone would be applied to the existing rural residential zoning (RR-2.5) and would establish additional or stricter standards and criteria for covered properties in addition to those of the underlying zoning district. Anticipated allowable uses would include, but are not limited to, alternative energy, distribution, light industrial, light manufacturing, research and development, and warehousing. The intent of the Overlay Zone is to allow more flexibility and development potential as well as the opportunity to provide additional jobs to this underutilized portion of the city.

Based on input from City staff, it is assumed that 75% of the currently vacant/undeveloped land could develop as the new allowable uses included in the Overlay zone. For the purpose of this transportation assessment, the breakdown of potential new uses on existing vacant or undeveloped parcel were assumed to be the following based on input provided by the City's Community Development Department:

- 42.5% Warehousing
 - 29.75% High-Cube
 - 12.75% standard warehouse
- 20% Light Industrial/Manufacturing
- 12.5% Research & Development

The remaining 25% of the currently vacant/undeveloped land would utilize the existing zoning designations of the current General Plan and would remain unchanged without and with the proposed Overlay Zone (i.e., rural residential, agriculture).

VMT Guidelines

The primary resource for the VMT assessment is the City of Lancaster's *Local Transportation Assessment Guidelines* (January 2021). As outlined in the guidelines, land use projects that meet the City established screening threshold criteria based on size, location, proximity to transit, or trip-making potential may be presumed to have a less-than-significant transportation impact under CEQA and do not require a full detailed VMT analysis. If the project is not screened out from a full VMT analysis, the Southern California Association of Governments (SCAG) regional travel demand model shall be used to determine the project's full VMT.

While the City has identified Los Angeles County's Antelope Valley Planning Area (AVPA) as the geographic area for establishing the baseline VMT, this programmatic assessment only considers the traffic analysis zones (TAZ's) within the Overlay Zone. In addition, the City has established a threshold of significance as 15% below the baseline VMT and projects where the VMT exceeds this threshold are considered to have a significant VMT impact, however this assessment only compares the changes to VMT associated with the land use modifications in the Overlay Zone.

VMT Screening Assessment

As outlined in the City's guidelines, land use projects that meet certain screening criteria may be presumed to have a less-than-significant transportation impact under CEQA. **Table 1** summarizes the each of the screening criteria identified in the guidelines and is provided for information purposes only. As the Overlay Zone is subject to a programmatic analysis evaluating the impacts associated with the changes in the allowable land uses, it is not subject to the project specific screening. Potential transportation impacts under CEQA for the Overlay Zone are discussed in the following sections.

TABLE 1 – VMT SCREENING CRITERIA SUMMARY

Screening Criteria	Project Requirements to Meet Screening Criteria
1 Project Size	A project that generates 110 or fewer daily trips.
2 Locally Serving Retail	A project that has locally serving retail uses that are 50,000 square feet or less, including specialty retail, shopping center, grocery store, pharmacy, financial services, fitness center or health club, restaurant, and café. If the project contains other land uses, those uses need to be considered under other applicable screening criteria.
3 Low VMT Area	A residential or office project that is located in a TAZ that is already 15% below the AVPA Baseline VMT.
4 Transit Proximity	A multifamily residential project providing higher density housing or a commercial project in an area already zoned for commercial use that is located within ½ mile of the Metrolink station or within ½ mile of a bus stop with service frequency of 15 minutes or less during commute periods.
5 Affordable Housing	A residential project that provides affordable housing units; if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.
6 Transportation Facilities	Transportation projects that promote non-auto travel, improve safety, or improve traffic operations at current bottlenecks, such as transit, bicycle and pedestrian facilities, intersection traffic control (e.g. traffic signals or roundabouts), or widening at intersections to provide new turn lanes.

Source: City of Lancaster Department of Public Works *Local Transportation Assessment Guidelines (January 2021)*

VMT Analysis Methodology

As stated previously, this VMT assessment is consistent with the City of Lancaster’s VMT guidelines. General assumptions and methodology for the VMT analysis are as follows:

Regional Travel Demand Model – As outlined in the City’s guidelines, the Southern California Association of Governments (SCAG) regional travel demand model was used to determine the VMT within the affected TAZ’s. This travel demand model was used to develop the VMT data needed for this analysis using standard employment densities for the land uses described previously.

Geographic Area – According to the City’s guidelines, the City of Lancaster has identified Los Angeles County’s Antelope Valley Planning Area (AVPA) as the geographic area for the Baseline VMT. However, this programmatic assessment compares the VMT per service population without and with the change in land use for the following TAZ’s within the Overlay Zone:

- 20331100
- 20331200
- 20333100
- 20333200
- 20333300
- 20333400
- 20333500
- 20333600
- 20333700
- 20333800
- 20333900
- 20335100
- 20335200
- 20335300
- 20335400
- 20335500
- 20335600

VMT Metric – The City guidelines provide recommended thresholds for by land use type. For Land Use Plans the appropriate VMT metric is total VMT per service population which was used in this analysis using the Production/Attraction (PA) methodology.

VMT Threshold – As outlined in the City’s guidelines, a proposed land use plan exceeding a level of 15% below the AVPA baseline may indicate a significant transportation impact. Conversely, land use plans that would generate VMT that is 15% or more below the existing VMT per service population may indicate a less-than-significant transportation impact. However, this programmatic assessment only compares the VMT metrics with the established General Plan against the proposed land use modifications associated with the Overlay Zone.

Modeling Assumptions

The SCAG transportation demand model (TDM) covers the Antelope Valley Planning Area (AVPA) and includes Lancaster, Palmdale, and portions of LA County. This model uses 2020 as the baseline year with the future forecast year of 2040 and was used to calculate the Baseline Total VMT per service population Without and With the Overlay Zone using the Production/Attraction (PA) method. No modifications were made to the model's roadway network.

After the model was run to establish the Existing 2020 and Future Forecast 2040 baseline conditions with the City's General Plan land use assumptions (Without Overlay Zone), the proposed land use modifications were coded into the model utilizing the industrial land use assumptions discussed previously using standard employment densities. Based on input from City staff (Community Development Department), it is assumed that 75% of the currently vacant/undeveloped land would utilize the new proposed land uses based on the following breakdown:

- 42.5% Warehousing
 - 29.75% High-Cube
 - 12.75% standard warehouse
- 20% Light Industrial/Manufacturing
- 12.5% Research & Development

The remaining 25% of the currently vacant/undeveloped land would utilize the existing zoning designations of the current General Plan and would remain unchanged without and with the proposed Overlay Zone (i.e. rural residential, agriculture).

The following section outlines the results of the VMT assessment.

Programmatic Level VMT Assessment

For the TAZs within the Overlay Zone, the average VMT per service population is 45.6 under Existing 2020 with Lancaster General Plan conditions, which is calculated based on a total service population of 21,498 and a total daily VMT of 981,116. Under Future Forecast Year 2040 conditions with the General Plan land uses, the total service population is anticipated to increase to 21,704, however the total daily VMT is anticipated to decrease to 844,437. This results in a VMT per service population of 38.9.

With the land use modifications associated with the Overlay Zone, the average VMT per service population for the TAZs within the Overlay Zone is estimated to be of 34.1 under Existing 2020 with East Side Overlay conditions based on a total service population of 35,836 and a total daily VMT of 1,220,829. This is approximately 25.4% below the baseline General Plan conditions VMT per service population of 45.6.

Under Future Forecast Year 2040 Conditions with the East Side Overlay, the average VMT per service population within the study area is estimated to be 28.8 based on a service population of 36,042 and a total VMT of 1,038,314. This is approximately 26% below the baseline General Plan 2040 conditions VMT per service population of 38.9.

Table 2 summarizes the results of the General Plan VMT assessment as well as the conditions with the Overlay Zone land use modifications. As shown, the total daily VMT is projected to increase due to the intensification of employment opportunities with the Overlay Zone compared to the General Plan; however, the VMT per service population shows an overall decrease of over 25% for both analysis years.

Exhibit B contains the SCAG VMT Model Results.

TABLE 2 – VMT SUMMARY

Performance Measure	With Lancaster GP	With East Side Overlay	Net Difference	% Difference
Existing 2020				
Population	21,419	16,749	-4,670	-21.80%
Employment	79	19,087	19,008	24060.76%
Service Population	21,498	35,836	14,338	66.69%
Total Daily VMT (PA Method)	981,116	1,220,829	239,713	24.43%
VMT service Population	45.6	34.1	-12	-25.22%
Future Forecast Year 2040				
Population	21,618	16,948	-4,670	-21.60%
Employment	86	19,094	19,008	22102.33%
Service Population	21,704	36,042	14,338	66.06%
Total Daily VMT (PA Method)	844,437	1,038,314	193,877	22.96%
VMT service Population	38.9	28.8	-10	-25.96%

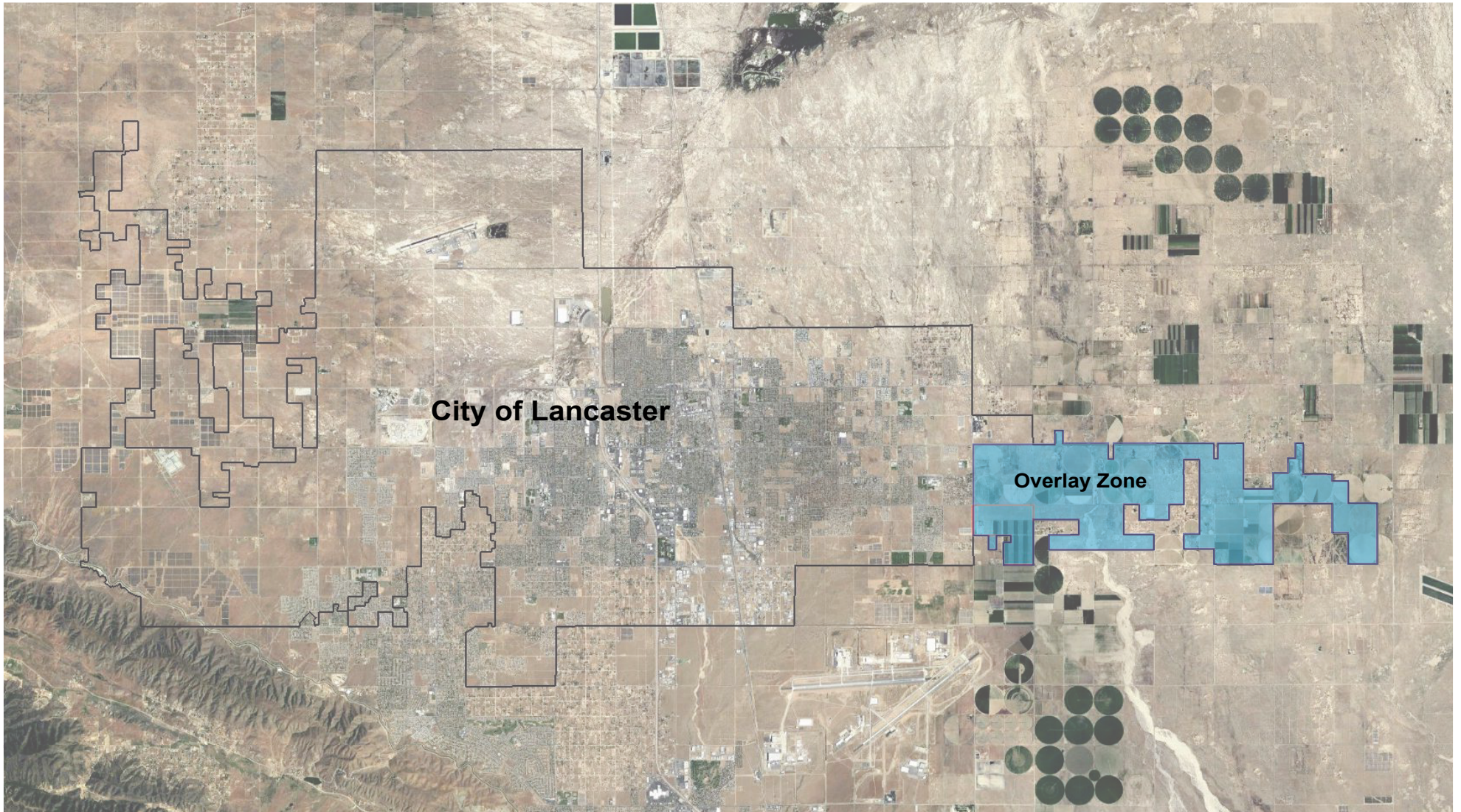
Conclusion

As the Overlay Zone proposes to increase the allowable land uses within the study area, an assessment of the change in VMT per service population was conducted to evaluate the potential transportation impacts.

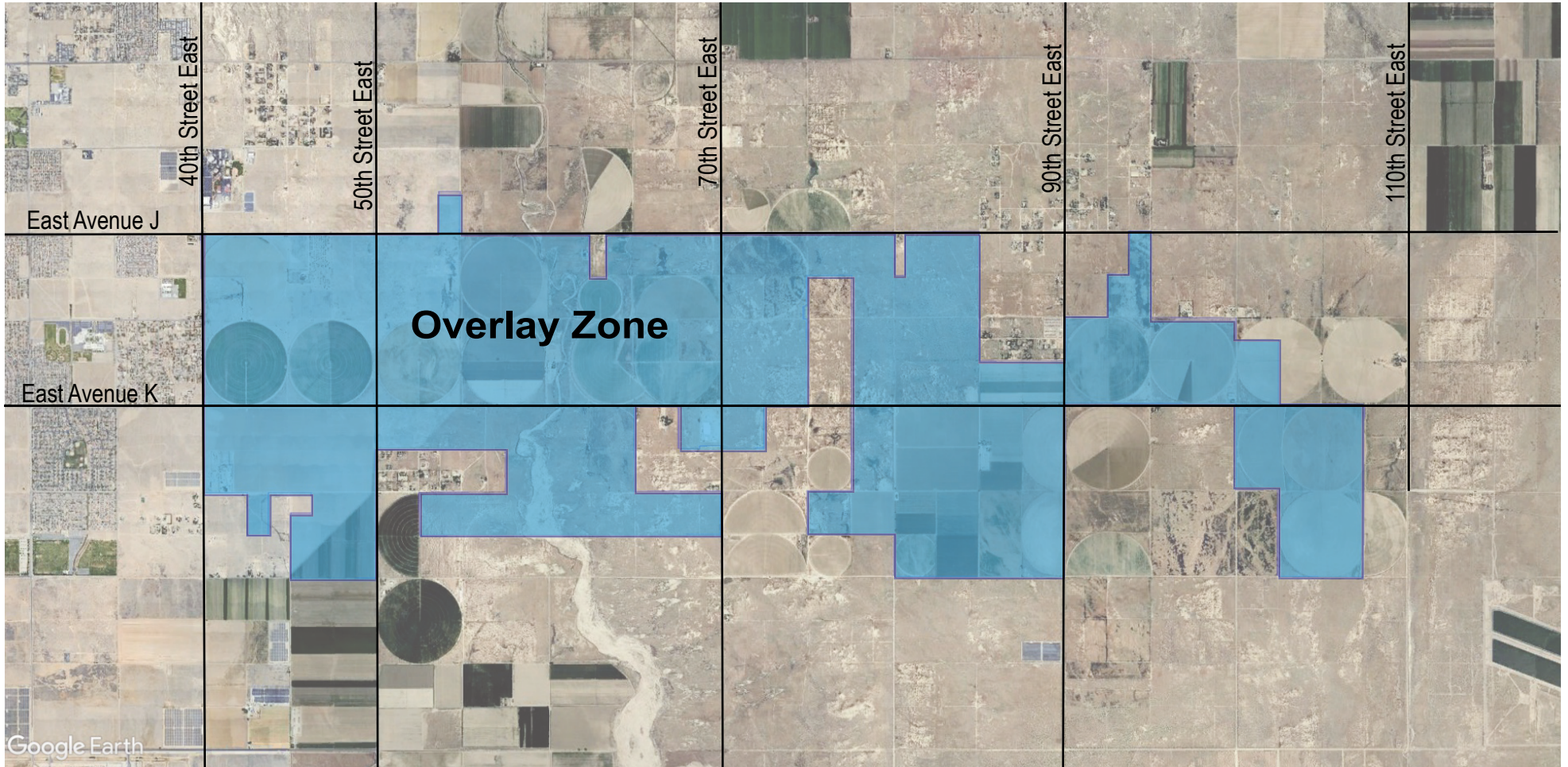
The SCAG transportation demand model was run to obtain the baseline VMT per service population conditions for the Existing 2020 conditions and Future Forecast 2040 conditions. The land use modifications associated with the Overlay Zone were coded into the model using standard employment densities to determine the “with Overlay Zone” VMT per service population.

The results of the model runs and VMT analysis demonstrated that the total VMT per service population for the Overlay Zone shows a decrease of over 25% compared to the General Plan VMT per service population for both analysis years. Therefore, the **Overlay Zone is presumed to result in a less-than-significant transportation impact and no mitigation is required.**

Attachment A
Exhibits



Not to Scale



Not to Scale

Attachment B
SCAG VMT Model Results

Baseline Year 2020 Without and With Project Total VMT

	City of Lancaster Overlay Study Area	2020 With Lancaster GP	2020 With Lancaster Overlay	Note
	Population	21,419	16,749	
	Employment	79	19,087	
	Service Population	21,498	35,836	
Vehicle No Trucks	Total vehicle trips (no trucks)	48,382	88,020	
	Total vehicle VMT (no trucks)	1,063,842	1,321,939	
	Average vehicle trip distance (no trucks)	21.99	15.02	[a]
Trucks Only	Total truck trips	417	14,091	
	Total truck VMT	13,697	262,878	
	Average truck trip distance	32.87	18.66	[a]
All Vehicles	Total vehicle trips (include trucks)	48,799	102,111	
	Total VMT (include trucks)	1,077,539	1,584,817	
	Total VMT per service population (include trucks)	22.08	15.52	[b]

Notes:

[a] The 6.51 mile of average vehicle trip distance (no trucks) and 18.22 mile of average truck trip distance are not the trip lengths generated by the net new development directly, but the effect on vehicle trip and VMT for the whole project area. The effect of adding more housing to the study area will reduce trip length on average. In order to compute the average vehicle distance, the net new VMT should be divided by the net new vehicle trips, but this should not be interpreted to mean that the new development will have markedly different patterns than the existing development; rather the effects on travel of adding housing will be to bring everyone's average down

[b] We recommend to divide the net change of Total VMT by the net change of Service Population. Please note that the results of 9.52 VMT per Service Population is not actual VMT per Service Population generated by the new development. It means that by adding new housing, this VMT metric will decrease on average.

Future Forecast Year 2040 Without and With Project Total VMT

	City of Lancaster Overlay Study Area	2040 With Lancaster GP	2040 With Lancaster Overlay	Note
	Population	21,618	16,948	
	Employment	86	19,094	
	Service Population	21,704	36,042	
Vehicle No Trucks	Total vehicle trips (no trucks)	44,778	80,321	
	Total vehicle VMT (no trucks)	943,164	1,147,720	
	Average vehicle trip distance (no trucks)	21.06	14.29	[a]
Trucks Only	Total truck trips	423	14,116	
	Total truck VMT	14,347	274,978	
	Average truck trip distance	33.88	19.48	[a]
All Vehicles	Total vehicle trips (include trucks)	45,201	94,437	
	Total VMT (include trucks)	957,512	1,422,699	
	Total VMT per service population (include trucks)	21.18	15.07	[b]

Notes:

directly, but the effect on vehicle trip and VMT for the whole project area. The effect of adding more housing to the study area will reduce trip length on average. In order to compute the average vehicle distance, the net new VMT should be divided by the net new vehicle trips, but this should not be interpreted to mean that the new development will have markedly different patterns than the existing development; rather the effects on travel of adding housing will be to bring everyone's average down (including existing uses).

[b] We recommend to divide the net change of Total VMT by the net change of Service Population. Please note that the results of 9.45 VMT per Service Population is not actual VMT per Service Population generated by the new development. It means that by adding new housing and jobs, this VMT metric will decrease on average.

Baseline Year 2020 Without and With Project VMT Metrics Summary

2020	With Lancaster GP	With Lancaster Overlay
Households	7,080	5,305
Population	21,419	16,749
Employment	79	19,087
Service Population	21,498	35,836
Homebased (HB) VMT	906,186	547,461
Homebased Work (HBW) VMT	913	353,570
PA VMT	981,116	1,220,829
HB VMT per capita	42.3	32.7
HBW VMT per employee	11.6	18.5
PA VMT per service population	45.6	34.1

Future Forecast Year 2040 Without and With Project VMT Metrics Summary

2040	With Lancaster GP	With Lancaster Overlay
Households	7,133	5,358
Population	21,618	16,948
Employment	86	19,094
Service Population	21,704	36,042
Homebased (HB) VMT	779,655	479,015
Homebased Work (HBW) VMT	768	279,838
PA VMT	844,437	1,038,314
HB VMT per capita	36.1	28.3
HBW VMT per employee	8.9	14.7
PA VMT per service population	38.9	28.8

Attachment C
SCAG Model Data

2020 lancaster gp (not original scag model)

			21,419		21,414		7,080		-			79		913		906,186		928,393		52,723	
TAZ	TAZ_TIER1	CNTY	TAZ_ID	POP	RES	HH	GN	K12	COLLEGE	MEDIAN	TOT_EMP	ZONETYPE	Internal_Sequence_TAZ	HBW_A_VMT	HB_P_VMT	TOT_P_VMT	TOT_A_VMT				
20331100	20331000	Los Angeles	20331100	4212.456139	4212.456139	1404.152046	0	0	0	52482	3		1054	14.434158	120819.875	124232.3906	8591.290039				
20331200	20331000	Los Angeles	20331200	26	26	7	0	0	0	43136	10		1055	119.028458	745.483459	804.820801	322.555084				
20333100	20333000	Los Angeles	20333100	6748.086883	6748.086883	1557.250819	0	0	0	161606	0		1062	0	361622.1875	365984.9375	10032.4043				
20333200	20333000	Los Angeles	20333200	1567.29788	1567.29788	632.462263	0	0	0	159778	0		1063	0	58487.24609	60407.3125	4592.878418				
20333300	20333000	Los Angeles	20333300	1069.448248	1069.448248	420.766524	0	0	0	39225	1		1064	0	27410.08398	28638.67188	2649.845703				
20333400	20333000	Los Angeles	20333400	1094.119888	1094.119888	442.542617	0	0	0	163762	42		1065	532.056213	43926.14453	45655.76172	4377.924805				
20333500	20333000	Los Angeles	20333500	2413.608381	2413.608381	1042.239983	0	0	0	51063	19		1066	213.530396	95657.8125	99443.63281	8490.079102				
20333600	20333000	Los Angeles	20333600	1086.76886	1081.76886	510.26833	0	0	0	60076	4		1067	34.27673	43039.83984	44843.82813	4355.26123				
20333700	20333000	Los Angeles	20333700	13	13	3	0	0	0	175545	0		1068	0	841.788635	853.248962	9.279515				
20333800	20333000	Los Angeles	20333800	6	6	2	0	0	0	180055	0		1069	0	211.392822	218.714691	11.529429				
20333900	20333000	Los Angeles	20333900	2	2	1	0	0	0	202833	0		1070	0	60.155449	60.155449	12.678136				
20335100	20335000	Los Angeles	20335100	81	81	45	0	0	0	51971	0		1080	0	3814.301758	4020.634033	570.496216				
20335200	20335000	Los Angeles	20335200	1795.108891	1795.108891	472.397077	0	0	0	81049	0		1081	0	89351.25781	91030.77344	4059.851807				
20335300	20335000	Los Angeles	20335300	44	44	21	0	0	0	56004	0		1082	0	1910.02417	1992.311157	237.537598				
20335400	20335000	Los Angeles	20335400	28	28	16	0	0	0	45949	0		1083	0	1055.159424	1119.224243	184.166428				
20335500	20335000	Los Angeles	20335500	1221.351036	1221.351036	495.240342	0	0	0	114145	0		1084	0	56773.37109	58589.72266	4155.245605				
20335600	20335000	Los Angeles	20335600	11	11	8	0	0	0	65703	0		1085	0	460.232819	497.087799	70.096176				

2040 lancaster gp (not original scag model)

			21,618		21,613		7,133		-			86		768		779,655		798,898		45,539	
TAZ	TAZ_TIER1	CNTY	TAZ_ID	POP	RES	HH	GN	K12	COLLEGE	MEDIAN	TOT_EMP	ZONETYPE	Internal_Sequence_TAZ	HBW_A_VMT	HB_P_VMT	TOT_P_VMT	TOT_A_VMT				
20331100	20331000	Los Angeles	20331100	4217.456139	4217.456139	1406.152046	0	0	0	52482	3		1054	11.799215	119256.1953	122202.2578	7825.894043				
20331200	20331000	Los Angeles	20331200	26	26	7	0	0	0	42616	10		1055	94.180656	755.832275	803.947998	256.357117				
20333100	20333000	Los Angeles	20333100	6749.086883	6749.086883	1558.250819	0	0	0	161606	0		1062	0	278586.7813	282334.1563	8836.407227				
20333200	20333000	Los Angeles	20333200	1574.29788	1574.29788	634.462263	0	0	0	159778	0		1063	0	53282.42969	54924.98828	4004.684814				
20333300	20333000	Los Angeles	20333300	1074.448248	1074.448248	421.766524	0	0	0	39225	1		1064	0	25009.53906	26103.26953	2503.062988				
20333400	20333000	Los Angeles	20333400	1106.119888	1106.119888	446.542617	0	0	0	163762	42		1065	436.10437	38093.76953	39622.98828	3979.440674				
20333500	20333000	Los Angeles	20333500	2424.608381	2424.608381	1045.239983	0	0	0	51063	19		1066	139.408615	85504.51563	88650.1875	7058.680664				
20333600	20333000	Los Angeles	20333600	1101.76886	1096.76886	514.26833	0	0	0	60076	8		1067	86.996246	34996.69922	36608.02344	4118.007813				
20333700	20333000	Los Angeles	20333700	13	13	3	0	0	0	172336	0		1068	0	751.313904	761.614685	8.526608				
20333800	20333000	Los Angeles	20333800	6	6	2	0	0	0	180055	1		1069	0	188.555618	218.736038	129.299316				
20333900	20333000	Los Angeles	20333900	2	2	1	0	0	0	202833	0		1070	0	68.933189	68.933189	9.891737				
20335100	20335000	Los Angeles	20335100	142	142	62	0	0	0	58108	0		1080	0	5798.602051	6030.566406	319.736694				
20335200	20335000	Los Angeles	20335200	1804.108891	1804.108891	474.397077	0	0	0	81049	0		1081	0	81587.24219	83009.96875	3000.25415				
20335300	20335000	Los Angeles	20335300	63	63	25	0	0	0	63309	0		1082	0	2383.262939	2466.5	29.177753				
20335400	20335000	Los Angeles	20335400	49	49	20	0	0	0	58673	1		1083	0	1705.875122	1805.347412	122.415833				
20335500	20335000	Los Angeles	20335500	1243.351036	1243.351036	501.240342	0	0	0	114145	0		1084	0	51004.72656	52541.85547	3246.578857				
20335600	20335000	Los Angeles	20335600	22	22	11	0	0	0	63309	1		1085	0	680.365662	744.266724	90.82917				

2020 with project - lancaster overlay

			16,749		16,744		5,305		-		-		-		19,087		353,570		547,461		596,258		624,570	
TAZ	TAZ_TIER1	CNTY	TAZ_ID	POP	RES	HH	GN	K12	COLLEGE	MEDIAN	TOT_EMP	ZONETYPE	Internal_Sequence_TAZ	HBW_A_VMT	HB_P_VMT	TOT_P_VMT	TOT_A_VMT							
20331100	20331000	Los Angeles	20331100	4212.456139	4212.456139	1404.152046	0	0	0	52482	3		1054	17.569418	103871.0469	107324.3047	8490.65332							
20331200	20331000	Los Angeles	20331200	26	26	7	0	0	0	43136	10		1055	126.000412	668.072693	726.946777	321.029327							
20333100	20333000	Los Angeles	20333100	6748.086883	6748.086883	1557.250819	0	0	0	161606	0		1062	0	288262.25	292573.2188	9880.370117							
20333200	20333000	Los Angeles	20333200	1567.29788	1567.29788	632.462263	0	0	0	159778	0		1063	0	41831.63281	43703.45313	4745.041016							
20333300	20333000	Los Angeles	20333300	1069.448248	1069.448248	420.766524	0	0	0	39225	1		1064	0	22985.75586	24215.55859	2641.592529							
20333400	20333000	Los Angeles	20333400	1094.119888	1094.119888	442.542617	0	0	0	163762	42		1065	625.354797	33017.78125	34701.27344	4584.657227							
20333500	20333000	Los Angeles	20333500	44	44	19	0	0	0	51063	8471.485		1066	159933.5781	625.290527	11056.58301	191927.2031							
20333600	20333000	Los Angeles	20333600	58	53	25	0	0	0	60076	5901.88		1067	104437.4609	867.984375	8191.164551	125134.2969							
20333700	20333000	Los Angeles	20333700	13	13	3	0	0	0	175545	0		1068	0	749.89917	761.47522	9.751263							
20333800	20333000	Los Angeles	20333800	6	6	2	0	0	0	180055	0		1069	0	178.558319	185.802155	11.277536							
20333900	20333000	Los Angeles	20333900	2	2	1	0	0	0	202833	0		1070	0	47.533272	47.533272	11.244195							
20335100	20335000	Los Angeles	20335100	81	81	45	0	0	0	51971	0		1080	0	2950.273438	3147.750244	599.89325							
20335200	20335000	Los Angeles	20335200	38	38	10	0	0	0	81049	4657.725		1081	88430.29688	674.173157	16558.26367	269700.625							
20335300	20335000	Los Angeles	20335300	44	44	21	0	0	0	56004	0		1082	0	1194.119141	1258.557251	237.510666							
20335400	20335000	Los Angeles	20335400	28	28	16	0	0	0	45949	0		1083	0	671.505371	729.194031	189.332062							
20335500	20335000	Los Angeles	20335500	1706.560377	1706.560377	690.8	0	0	0	114145	0		1084	0	48570.00781	50749.07422	6011.831055							
20335600	20335000	Los Angeles	20335600	11	11	8	0	0	0	65703	0		1085	0	295.376831	328.068237	74.109482							

2040 with project - lancaster overlay

			16,948		16,943		5,358		-		-		-		19,094		279,838		479,015		520,118		518,196	
TAZ	TAZ_TIER1	CNTY	TAZ_ID	POP	RES	HH	GN	K12	COLLEGE	MEDIAN	TOT_EMP	ZONETYPE	Internal_Sequence_TAZ	HBW_A_VMT	HB_P_VMT	TOT_P_VMT	TOT_A_VMT							
20331100	20331000	Los Angeles	20331100	4217.456139	4217.456139	1406.152046	0	0	0	52482	3		1054	15.20882	103851.3047	106838.4531	7814.529785							
20331200	20331000	Los Angeles	20331200	26	26	7	0	0	0	42616	10		1055	97.806236	688.27594	736.585815	244.934937							
20333100	20333000	Los Angeles	20333100	6749.086883	6749.086883	1558.250819	0	0	0	161606	0		1062	0	227830.3281	231557.9219	8880.570313							
20333200	20333000	Los Angeles	20333200	1574.29788	1574.29788	634.462263	0	0	0	159778	0		1063	0	38981.27344	40593.73438	4179.410645							
20333300	20333000	Los Angeles	20333300	1074.448248	1074.448248	421.766524	0	0	0	39225	1		1064	0	21536.81836	22634.98828	2506.951416							
20333400	20333000	Los Angeles	20333400	1106.119888	1106.119888	446.542617	0	0	0	163762	42		1065	489.391876	29245.47266	30741.54102	4149.902344							
20333500	20333000	Los Angeles	20333500	55	55	22	0	0	0	51063	8471.485		1066	126547.5859	642.157104	9246.764648	154403.1563							
20333600	20333000	Los Angeles	20333600	73	68	29	0	0	0	60076	5905.88		1067	82828.07813	877.308472	7088.006836	101267.5156							
20333700	20333000	Los Angeles	20333700	13	13	3	0	0	0	172336	0		1068	0	677.675598	688.045227	10.186123							
20333800	20333000	Los Angeles	20333800	6	6	2	0	0	0	180055	1		1069	0	162.736328	192.679901	130.478012							
20333900	20333000	Los Angeles	20333900	2	2	1	0	0	0	202833	0		1070	0	57.056023	57.056023	10.722104							
20335100	20335000	Los Angeles	20335100	142	142	62	0	0	0	58108	0		1080	0	4523.375977	4747.098633	324.333893							
20335200	20335000	Los Angeles	20335200	47	47	12	0	0	0	81049	4657.725		1081	69860.32031	719.949829	13716.72754	229358.4688							
20335300	20335000	Los Angeles	20335300	63	63	25	0	0	0	63309	0		1082	0	1489.381836	1554.838623	22.787472							
20335400	20335000	Los Angeles	20335400	49	49	20	0	0	0	58673	1		1083	0	1104.885986	1194.639038	128.425308							
20335500	20335000	Los Angeles	20335500	1728.560377	1728.560377	696.8	0	0	0	114145	0		1084	0	46202.46484	48046.93359	4668.189453							
20335600	20335000	Los Angeles	20335600	22	22	11	0	0	0	63309	1		1085	0	424.388641	481.745605	95.555481							

2020 lancaster gp (not original scag model)

TAZ	cnty	District	POP	RES	HH	Tot_emp	NEWTAZ	OD_CarP_VMT	OD_CarA_VMT	OD_CarP_Trps	OD_CarA_Trps	OD_TrkP_VMT	OD_TrkA_VMT	OD_HTrkP_Trps	OD_HTrkA_Trps	OD_TotP_VMT	OD_TotA_VMT
			21,419.2	21,414.2	7,080.3	79.0		541,370.1	522,471.6	24,082.5	24,299.8	6,911.7	6,785.4	208.4	208.4	548,281.8	529,257.0
20331000	Los Angeles	7	4238.4561	4238.4561	1411.152	13	20331000	77041.29688	78138.84375	4638.461914	4700.160156	1257.418579	1230.230347	40.679096	40.679226	78298.71545	79369.0741
20333000	Los Angeles	7	14000.33	13995.33	4611.5305	66	20333000	363104.25	343654.3125	15571.25586	15631.2959	4575.597168	4487.647949	139.557526	139.557663	367679.8472	348141.9604
20335000	Los Angeles	7	3180.4599	3180.4599	1057.6374	0	20335000	101224.5938	100678.4453	3872.750977	3968.342773	1078.636963	1067.555786	28.140875	28.141638	102303.2307	101746.0011

2040 lancaster gp (not original scag model)

TAZ	cnty	District	POP	RES	HH	Tot_emp	NEWTAZ	OD_CarP_VMT	OD_CarA_VMT	OD_CarP_Trps	OD_CarA_Trps	OD_TrkP_VMT	OD_TrkA_VMT	OD_HTrkP_Trps	OD_HTrkA_Trps	OD_TotP_VMT	OD_TotA_VMT
			21,618.2	21,613.2	7,133.3	86.0		478,391.7	464,772.7	22,259.0	22,518.8	7,209.6	7,137.8	211.7	211.7	485,601.3	471,910.5
20331000	Los Angeles	7	4243.4561	4243.4561	1413.152	13	20331000	76322.04688	76509.78125	4366.551758	4426.020508	1321.786865	1305.498657	41.298759	41.299175	77643.83374	77815.27991
20333000	Los Angeles	7	14051.33	14046.33	4626.5305	71	20333000	307975.0938	293203.5313	14131.01465	14149.45996	4724.826172	4676.728516	140.794296	140.794708	312699.9199	297880.2598
20335000	Los Angeles	7	3323.4599	3323.4599	1093.6374	2	20335000	94094.55469	95059.35938	3761.410156	3943.32251	1162.97168	1155.562744	29.647888	29.650347	95257.52637	96214.92212

2020 with project - lancaster overlay

TAZ	cnty	District	POP	RES	HH	Tot_emp	NEWTAZ	OD_CarP_VMT	OD_CarA_VMT	OD_CarP_Trps	OD_CarA_Trps	OD_TrkP_VMT	OD_TrkA_VMT	OD_HTrkP_Trps	OD_HTrkA_Trps	OD_TotP_VMT	OD_TotA_VMT
			16,749.0	16,744.0	5,305.0	19,089.0		656,433.2	665,505.7	43,357.6	44,662.3	132,060.9	130,816.8	7,045.3	7,045.3	788,494.1	796,322.5
20331000	Los Angeles	7	4238.4561	4238.4561	1411.152	15	20331000	66626	68061	4663	4715	1234	1226	41	41	67860	69287
20333000	Los Angeles	7	10601.953	10596.953	3103.0222	14416	20333000	389949	381715	24606	24877	129995	128760	6984	6984	519943	510475
20335000	Los Angeles	7	1908.5604	1908.5604	790.8	4658	20335000	199859	215730	14089	15070	832	831	21	21	200691	216561

2040 with project - lancaster overlay

TAZ	cnty	District	POP	RES	HH	Tot_emp	NEWTAZ	OD_CarP_VMT	OD_CarA_VMT	OD_CarP_Trps	OD_CarA_Trps	OD_TrkP_VMT	OD_TrkA_VMT	OD_HTrkP_Trps	OD_HTrkA_Trps	OD_TotP_VMT	OD_TotA_VMT
			16,948.0	16,943.0	5,358.0	19,094.0	#####	570,503.2	577,217.1	39,515.3	40,806.1	138,236.8	136,741.6	7,058.0	7,058.0	708,740.0	713,958.7
20331000	Los Angeles	7	4243.4561	4243.4561	1413.152	13	20331000	67161.65625	67232.89844	4392.73291	4444.950195	1307.087769	1291.927856	41.296978	41.297398	68468.74402	68524.82629
20333000	Los Angeles	7	10652.953	10647.953	3118.0222	14421	20333000	328295.25	319666.25	21870.73438	22073.11328	136014.1875	134539.8125	6994.124023	6994.124512	464309.4375	454206.0625
20335000	Los Angeles	7	2051.5604	2051.5604	826.8	4660	20335000	175046.2656	190317.9063	13251.81348	14287.99316	915.519043	909.901489	22.552519	22.554977	175961.7847	191227.8077



11.5 Noise Data

Site Number: NM-1			
Recorded By: Tina Yuan, Winnie Woo			
Job Number: 188955			
Date: 6/30/2022			
Time: 8:30 a.m.			
Location: In front of 43214 50 th Street East			
Source of Peak Noise: Traffic along 50 th Street East			
Noise Data			
Leq (dB)	Lmax(dB)	Lmin (dB)	Peak (dB)
69.1	83.3	37.6	102.8

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Brüel & Kjær	2250	3011133	03/10/2022	
	Microphone	Brüel & Kjær	4189	3086765	03/10/2022	
	Preamp	Brüel & Kjær	ZC 0032	25380	03/10/2022	
	Calibrator	Brüel & Kjær	4231	2545667	03/10/2022	
Weather Data						
Est.	Duration: 10 minutes			Sky: Clear and Windy		
	Note: dBA Offset = -0.03			Sensor Height (ft): 5 ft		
	Wind Ave Speed (mph / m/s)		Temperature (degrees Fahrenheit)		Barometer Pressure (inches)	
	9 to 14		90.9		29.95	

Photo of Measurement Location





2250

Instrument:		2250
Application:		BZ7225 Version 4.7.6
Start Time:		06/30/2022 08:30:07
End Time:		06/30/2022 08:40:07
Elapsed Time:		00:10:00
Bandwidth:		1/3-octave
Max Input Level:		142.14

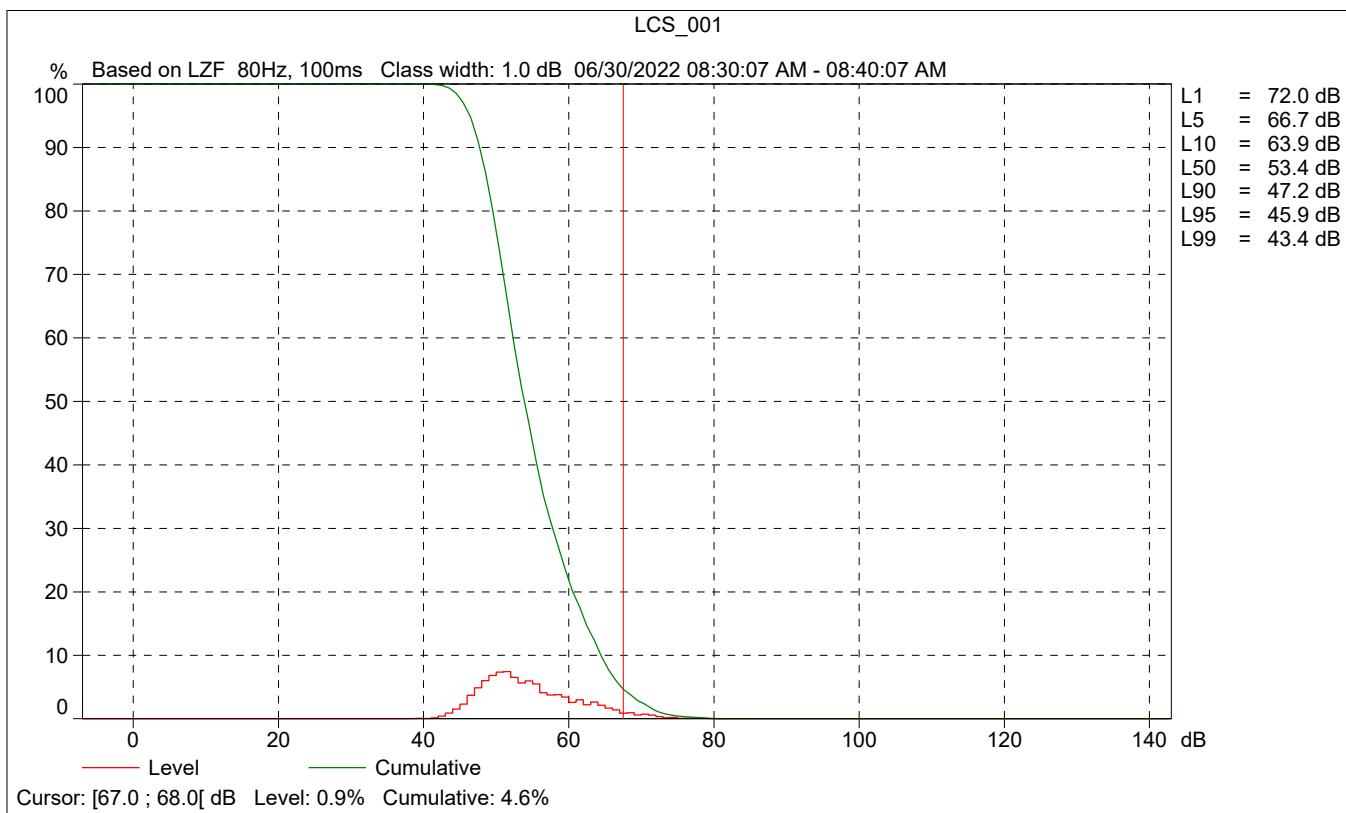
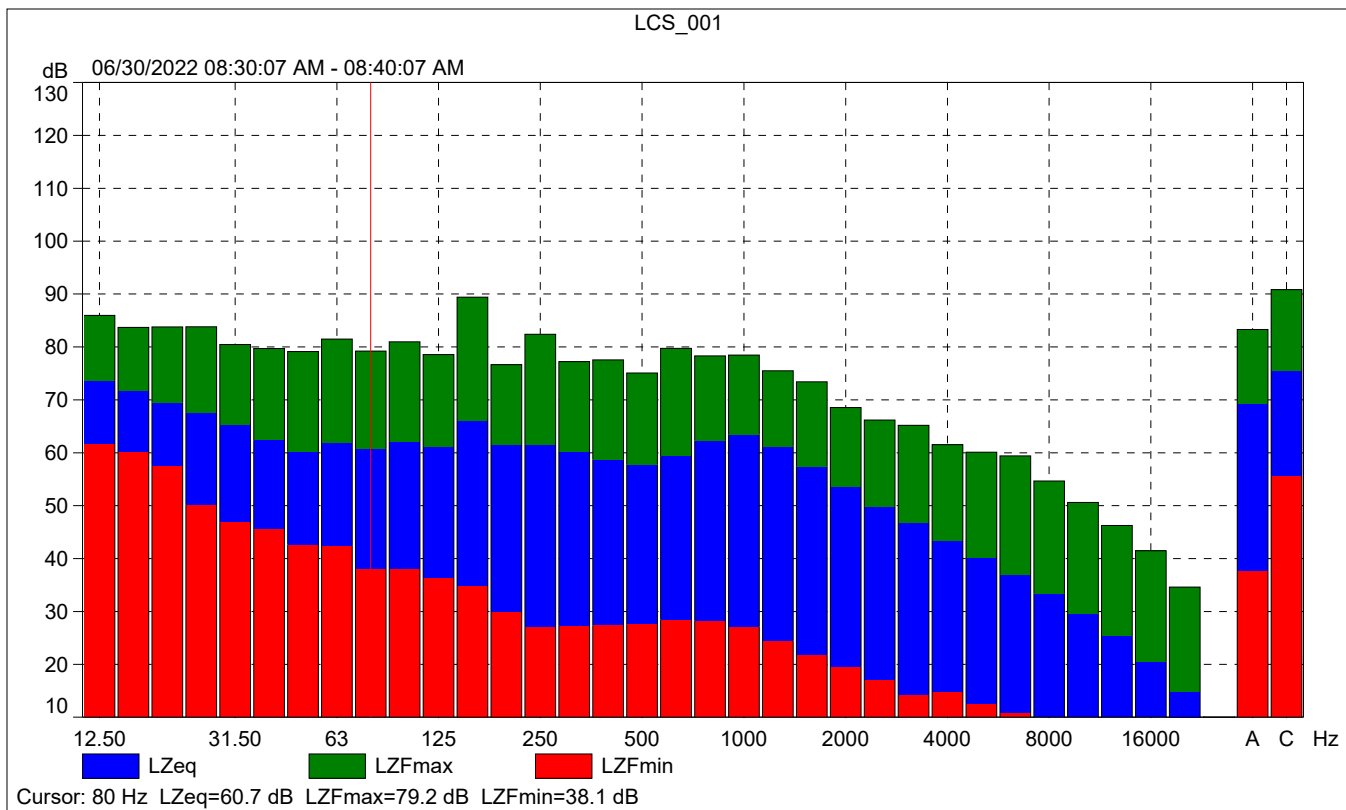
	Time	Frequency
Broadband (excl. Peak):	FSI	AC
Broadband Peak:		C
Spectrum:	FS	Z

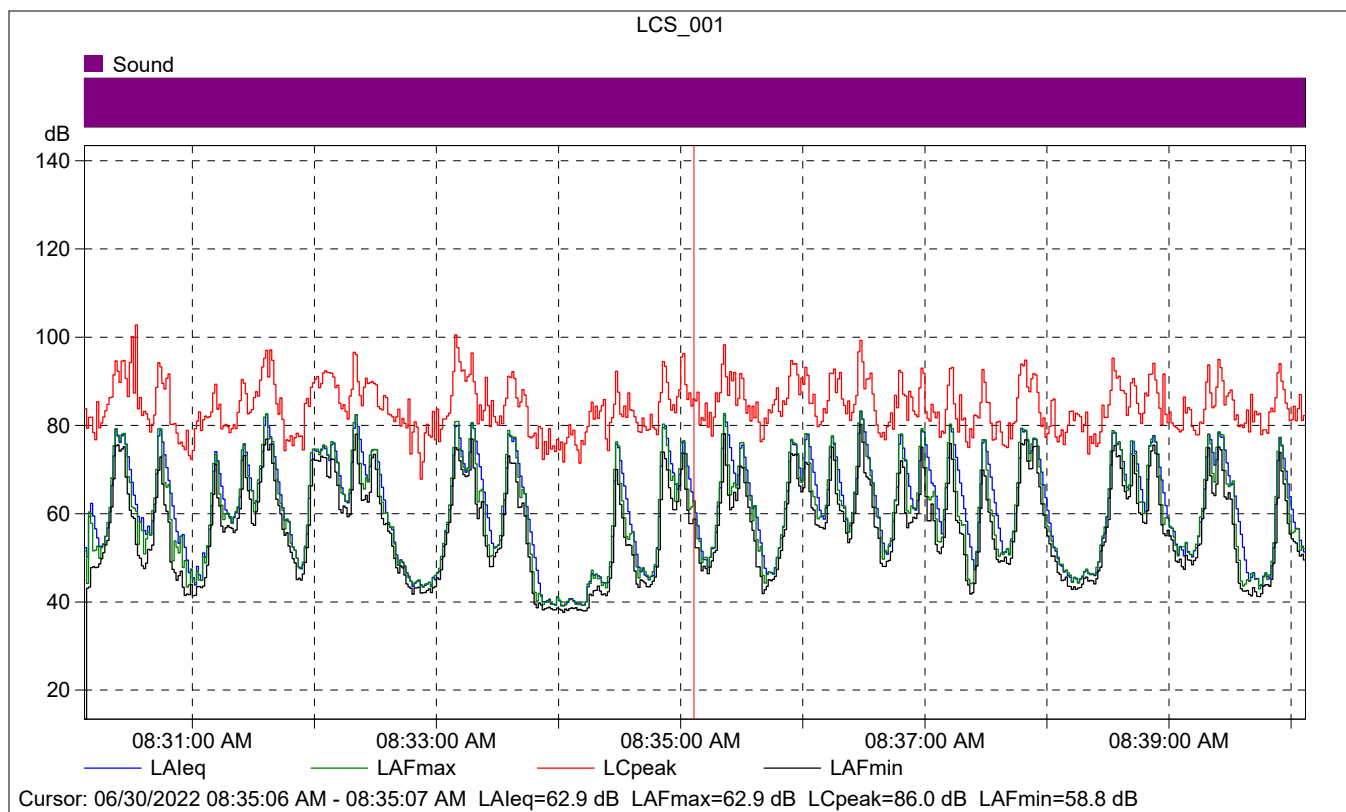
Instrument Serial Number:		3011133
Microphone Serial Number:		3086765
Input:		Top Socket
Windscreen Correction:		UA-1650
Sound Field Correction:		Free-field

Calibration Time:		06/30/2022 05:40:54
Calibration Type:		External reference
Sensitivity:		43.5336418449879 mV/Pa

LCS_001

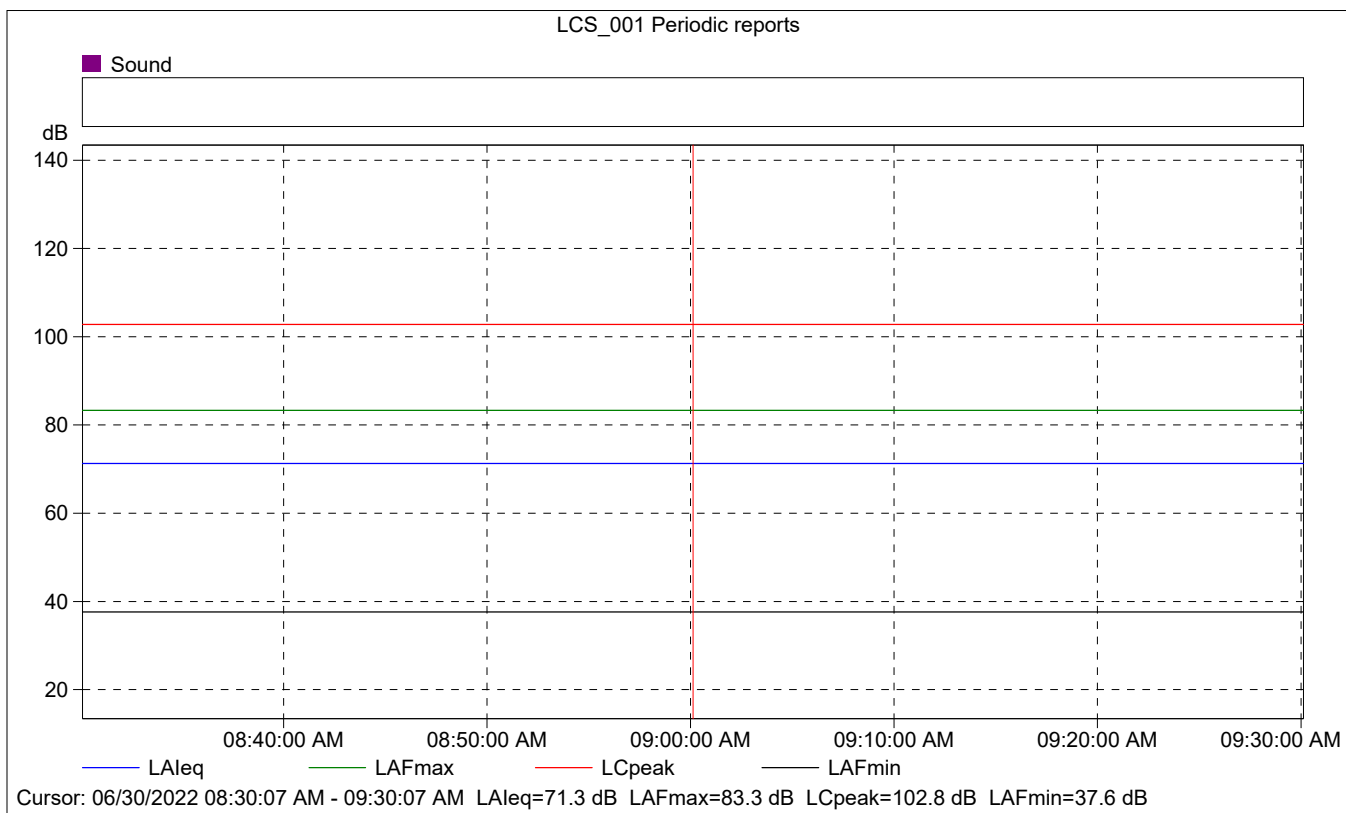
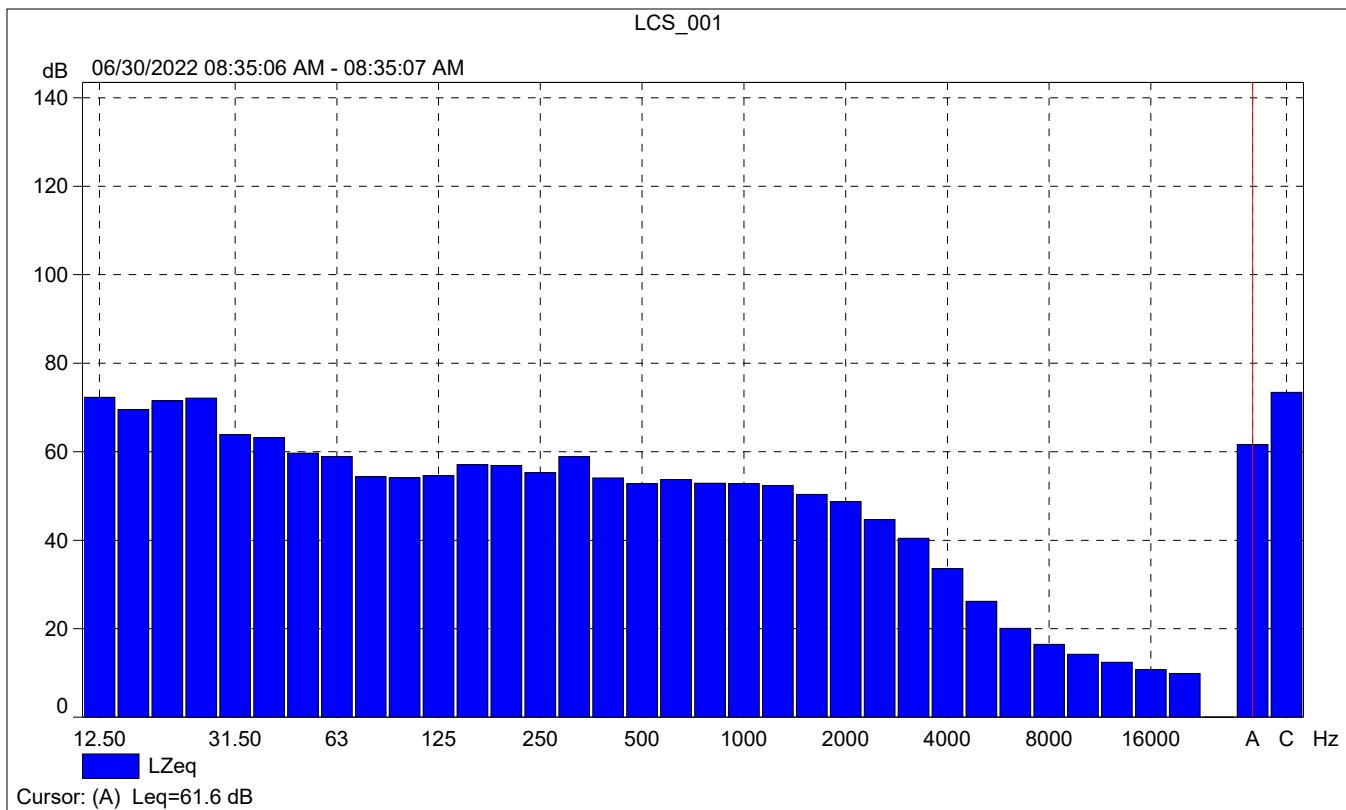
	Start time	End time	Elapsed time	Overload [%]	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value				0.00	69.1	83.3	37.6
Time	08:30:07 AM	08:40:07 AM	0:10:00				
Date	06/30/2022	06/30/2022					





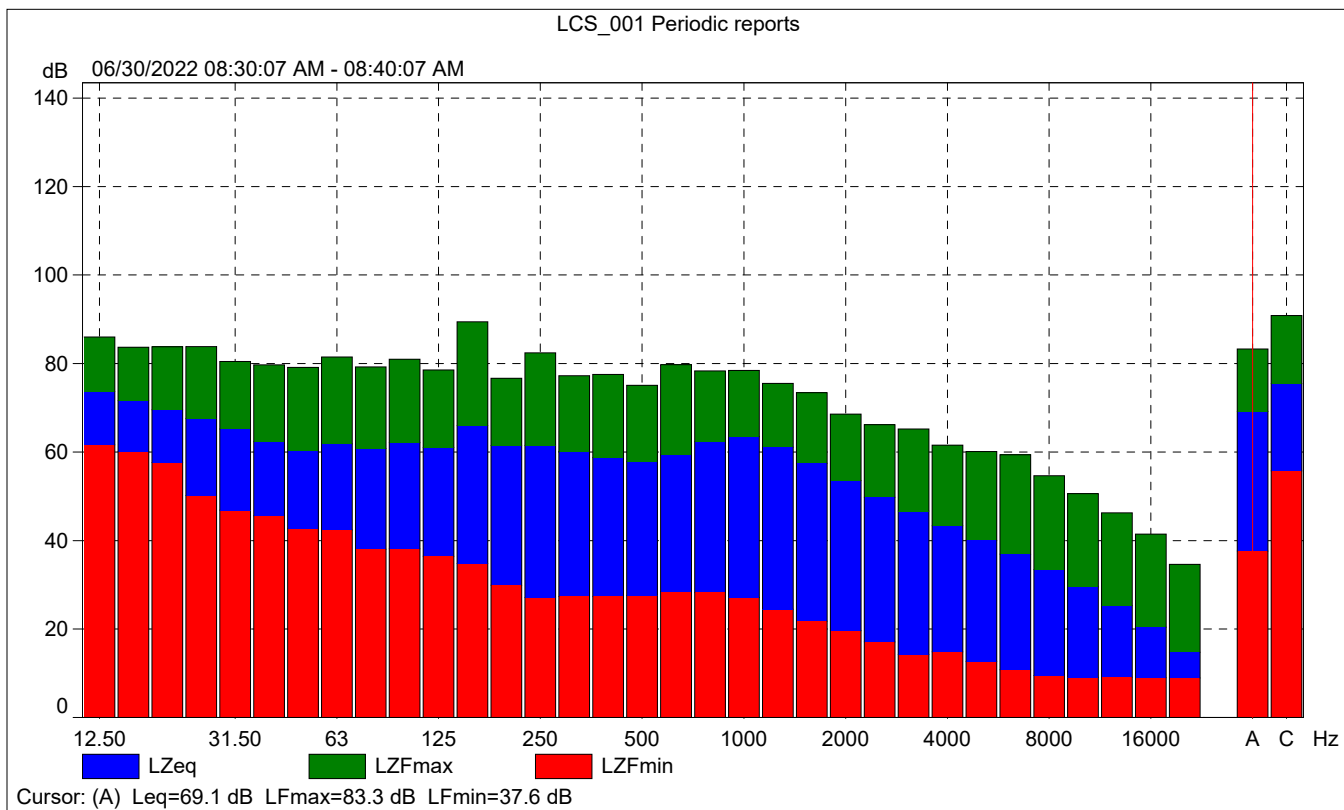
LCS_001

	Start time	Elapsed time	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			62.9	62.9	58.8
Time	08:35:06 AM	0:00:01			
Date	06/30/2022				



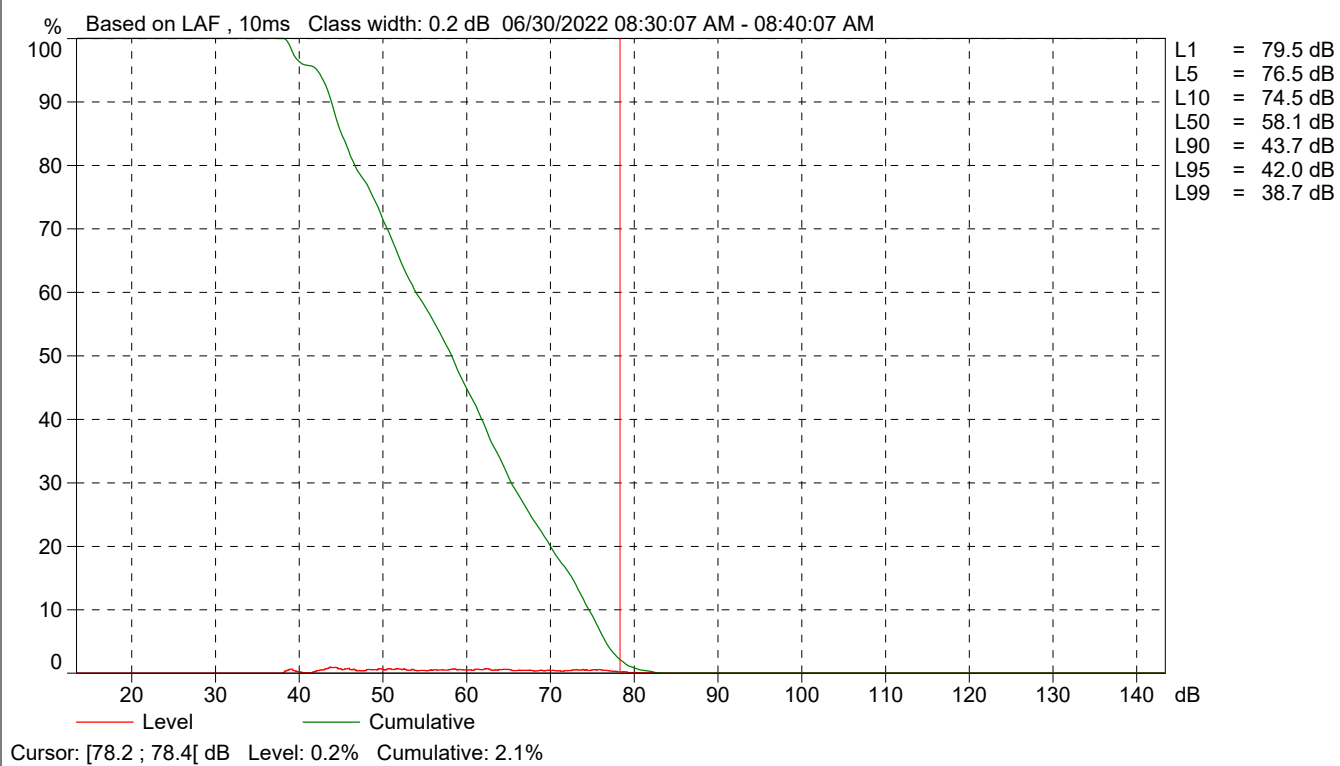
LCS_001 Periodic reports

	Start time	Elapsed time	Overload [%]	LAFeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			0.00	71.3	83.3	37.6
Time	08:30:07 AM	0:10:00				
Date	06/30/2022					





LCS_001 Periodic reports



Site Number: NM-2			
Recorded By: Tina Yuan, Winnie Woo			
Job Number: 188955			
Date: 6/30/2022			
Time: 8:40 a.m.			
Location: In front of driveway for 3819 East Avenue K			
Source of Peak Noise: Traffic along East Avenue K			
Noise Data			
Leq (dB)	Lmax(dB)	Lmin (dB)	Peak (dB)
67.9	82.0	39.5	102.2

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Brüel & Kjær	2250	3011133	03/10/2022	
	Microphone	Brüel & Kjær	4189	3086765	03/10/2022	
	Preamp	Brüel & Kjær	ZC 0032	25380	03/10/2022	
	Calibrator	Brüel & Kjær	4231	2545667	03/10/2022	
Weather Data						
Est.	Duration: 10 minutes			Sky: Clear and Windy		
	Note: dBA Offset = -0.03			Sensor Height (ft): 5 ft		
	Wind Ave Speed (mph / m/s)		Temperature (degrees Fahrenheit)		Barometer Pressure (inches)	
	9 to 14		90.9		29.95	

Photo of Measurement Location





2250

Instrument:		2250
Application:		BZ7225 Version 4.7.6
Start Time:		06/30/2022 08:52:16
End Time:		06/30/2022 09:02:16
Elapsed Time:		00:10:00
Bandwidth:		1/3-octave
Max Input Level:		142.14

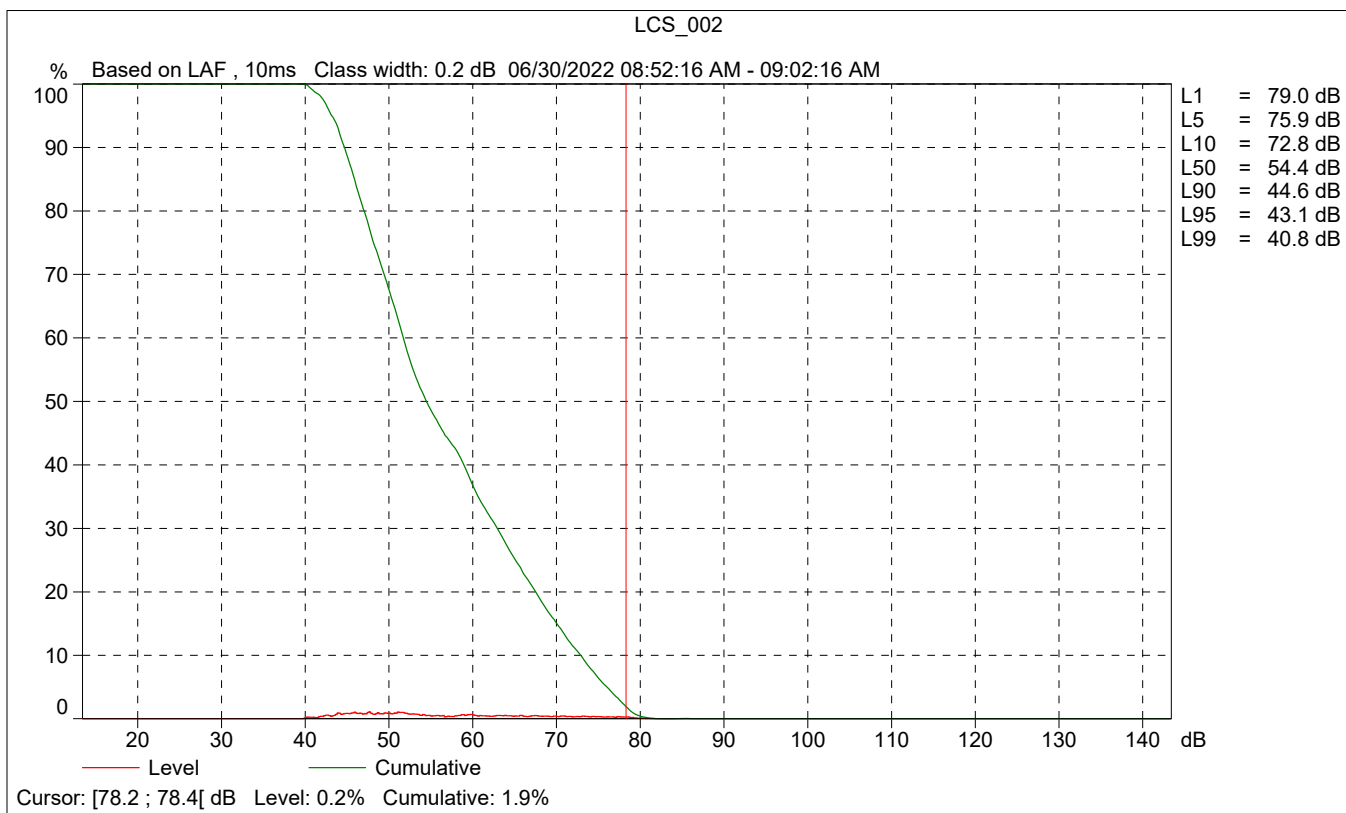
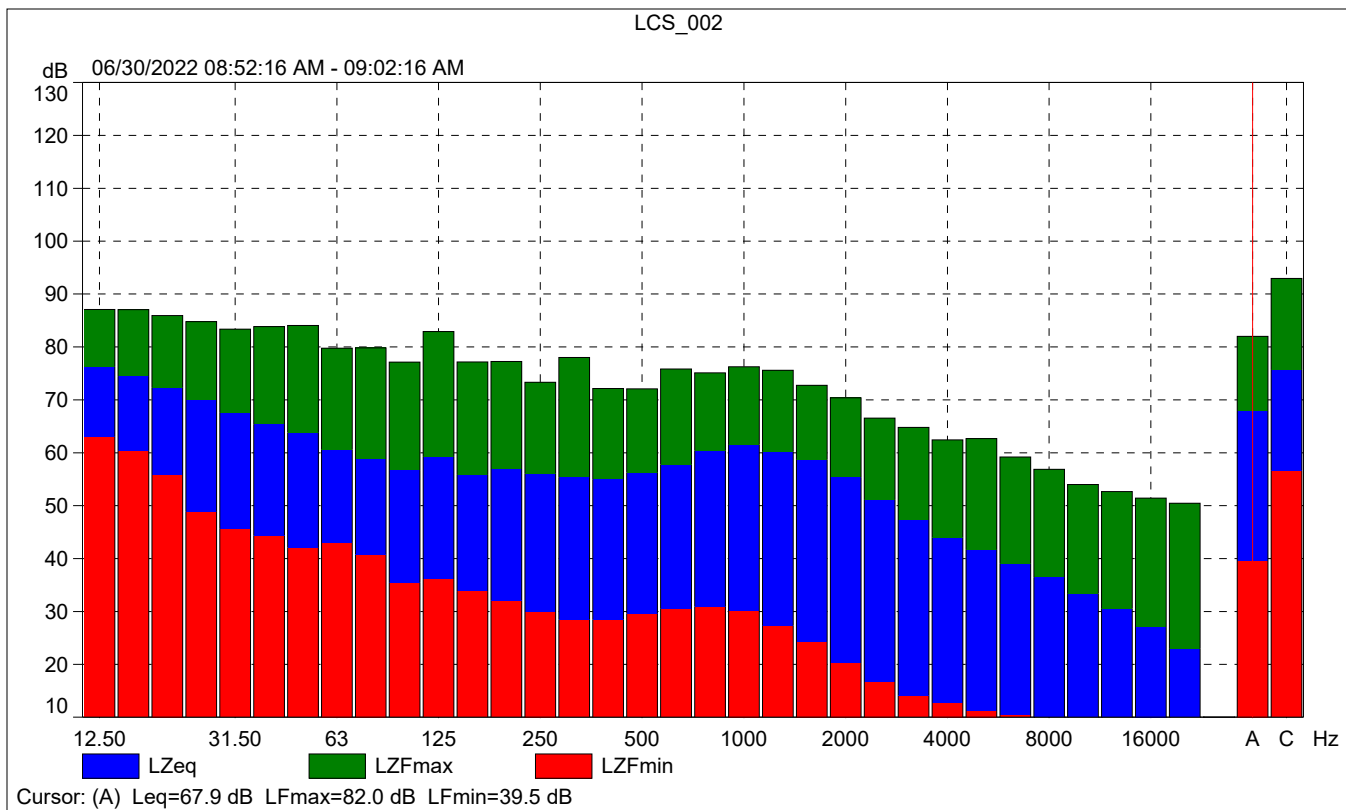
	Time	Frequency
Broadband (excl. Peak):	FSI	AC
Broadband Peak:		C
Spectrum:	FS	Z

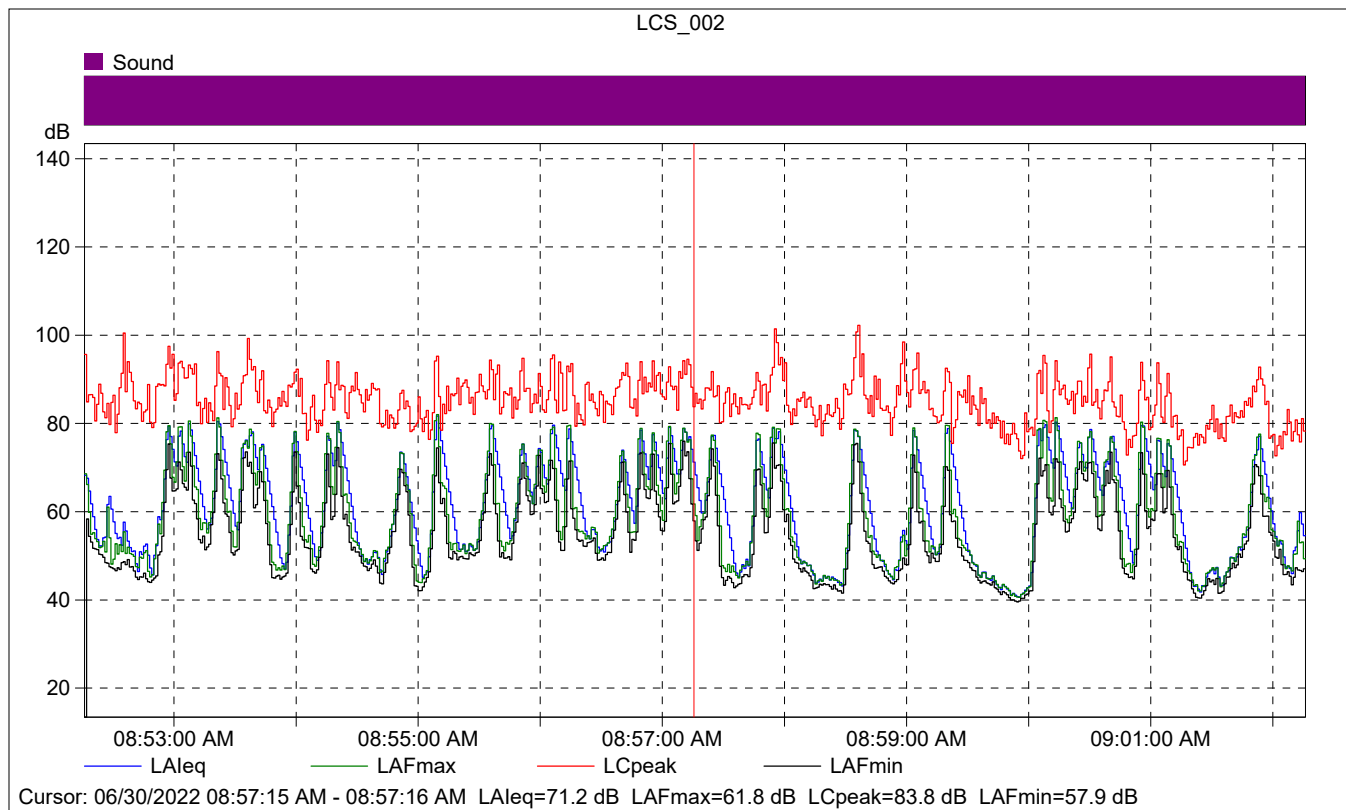
Instrument Serial Number:		3011133
Microphone Serial Number:		3086765
Input:		Top Socket
Windscreen Correction:		UA-1650
Sound Field Correction:		Free-field

Calibration Time:		06/30/2022 05:40:54
Calibration Type:		External reference
Sensitivity:		43.5336418449879 mV/Pa

LCS_002

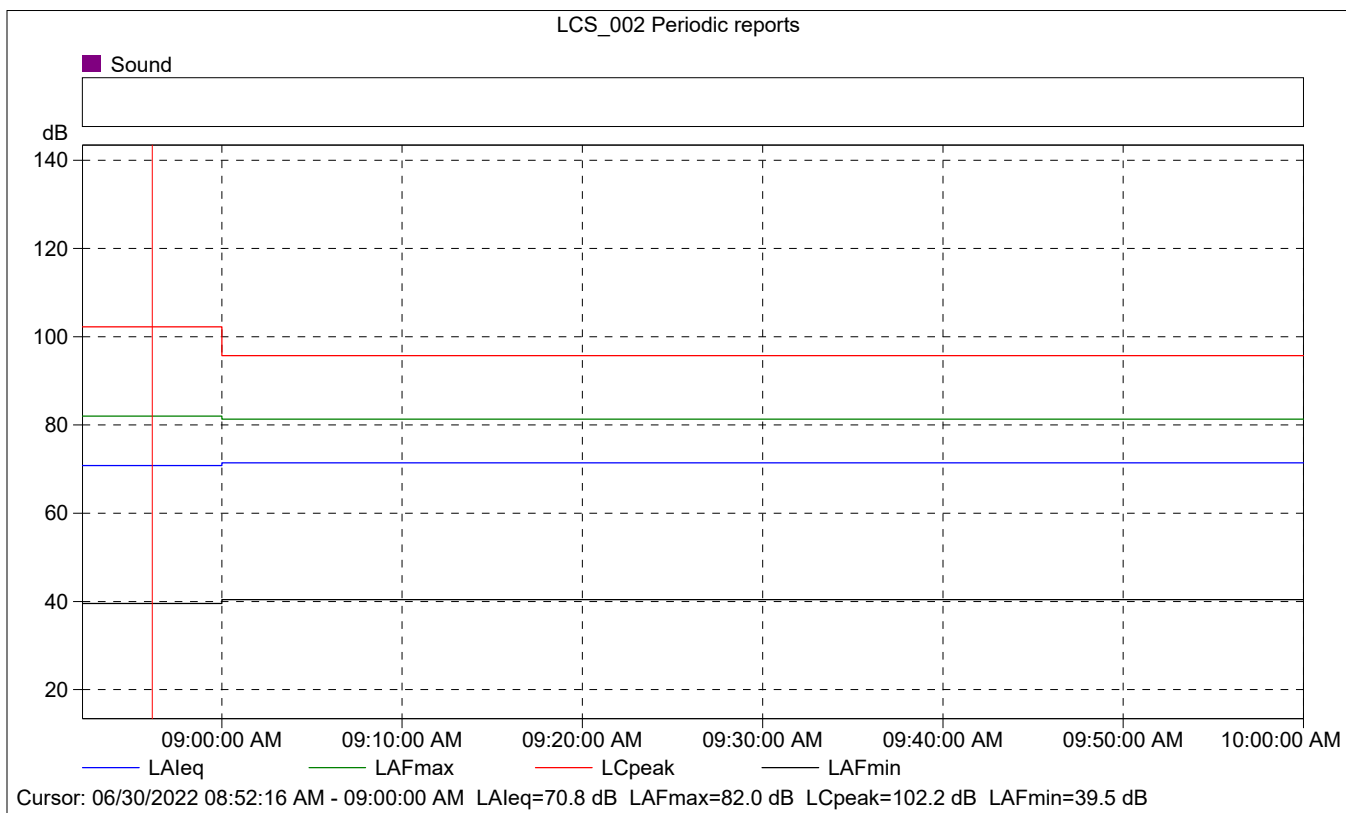
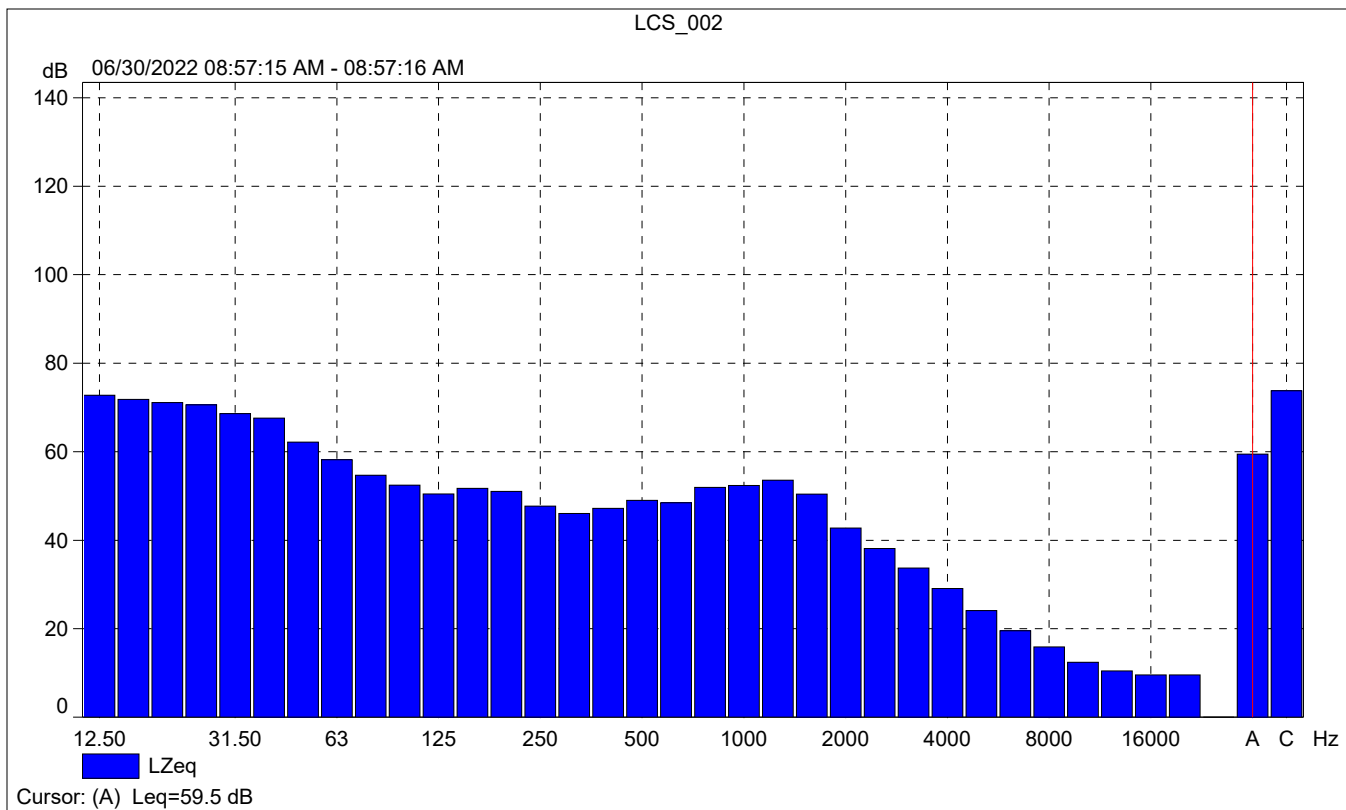
	Start time	End time	Elapsed time	Overload [%]	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value				0.00	67.9	82.0	39.5
Time	08:52:16 AM	09:02:16 AM	0:10:00				
Date	06/30/2022	06/30/2022					





LCS_002

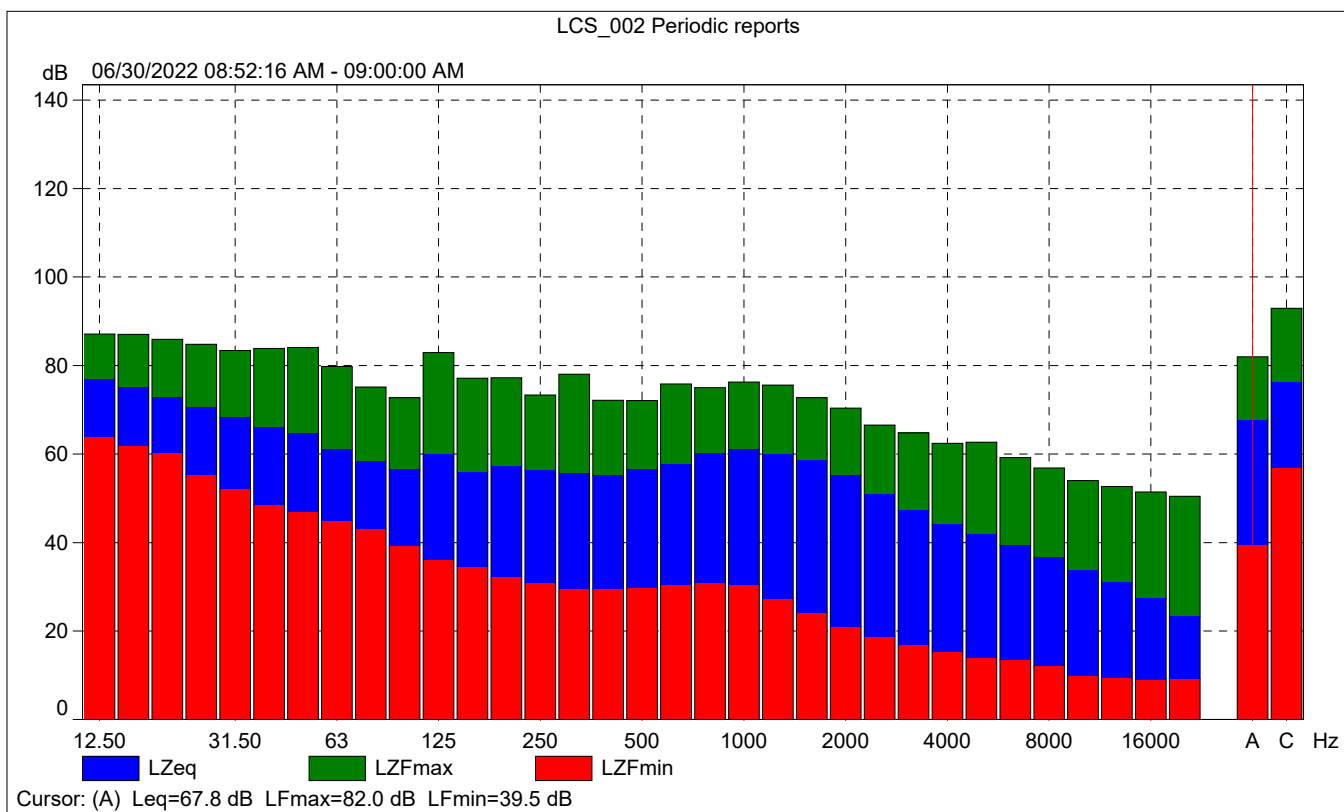
	Start time	Elapsed time	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			71.2	61.8	57.9
Time	08:57:15 AM	0:00:01			
Date	06/30/2022				





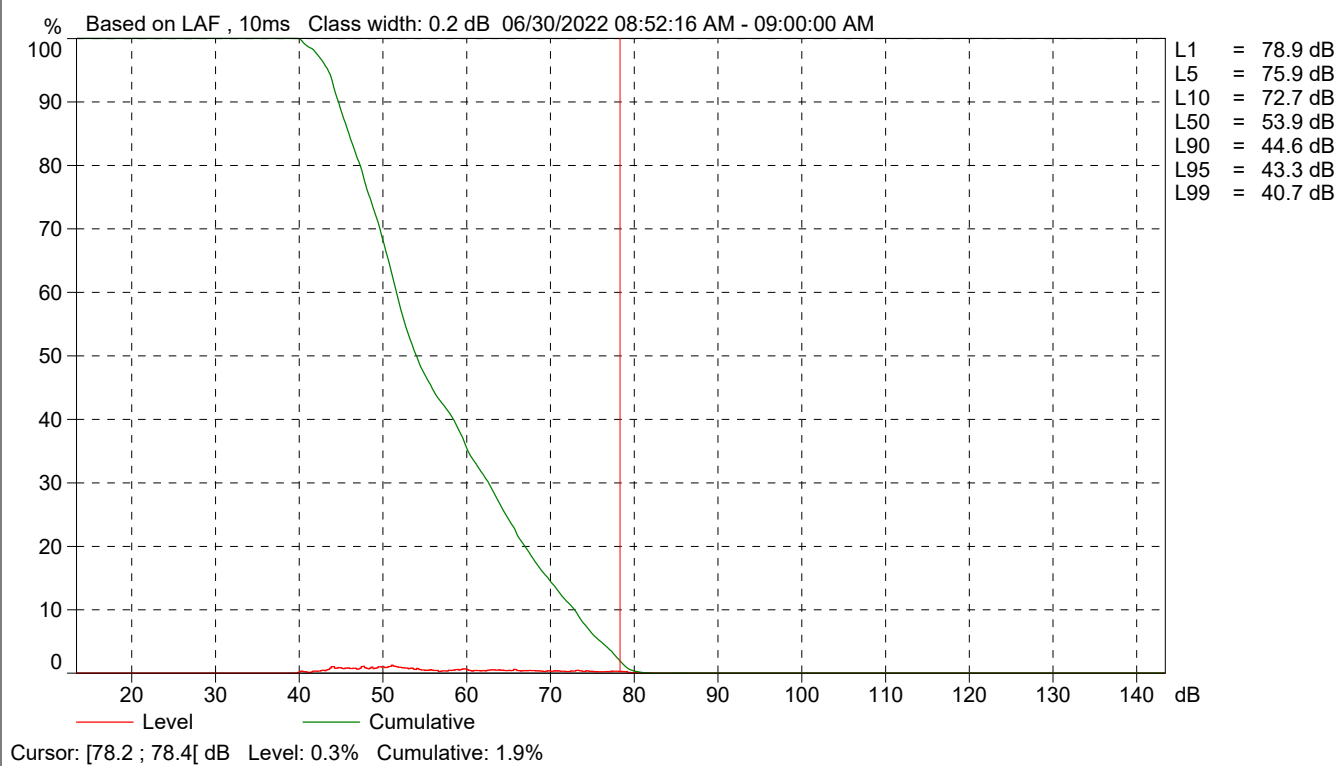
LCS_002 Periodic reports

	Start time	Elapsed time	Overload [%]	LALeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			0.00	70.8	82.0	39.5
Time	08:52:16 AM	0:07:44				
Date	06/30/2022					





LCS_002 Periodic reports



Site Number: NM-3			
Recorded By: Tina Yuan, Winnie Woo			
Job Number: 188955			
Date: 6/30/2022			
Time: 9:31 a.m.			
Location: Southwest corner of 42 nd Street East and East Lancaster Boulevard			
Source of Peak Noise: Traffic along East Lancaster Boulevard			
Noise Data			
Leq (dB)	Lmax(dB)	Lmin (dB)	Peak (dB)
63.8	86.5	38.7	103.4

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Brüel & Kjær	2250	3011133	03/10/2022	
	Microphone	Brüel & Kjær	4189	3086765	03/10/2022	
	Preamp	Brüel & Kjær	ZC 0032	25380	03/10/2022	
	Calibrator	Brüel & Kjær	4231	2545667	03/10/2022	
Weather Data						
Est.	Duration: 10 minutes			Sky: Clear and Windy		
	Note: dBA Offset = -0.03			Sensor Height (ft): 5 ft		
	Wind Ave Speed (mph / m/s)		Temperature (degrees Fahrenheit)		Barometer Pressure (inches)	
	9 to 14		90.9		29.95	

Photo of Measurement Location





2250

Instrument:		2250
Application:		BZ7225 Version 4.7.6
Start Time:		06/30/2022 09:31:44
End Time:		06/30/2022 09:41:44
Elapsed Time:		00:10:00
Bandwidth:		1/3-octave
Max Input Level:		142.14

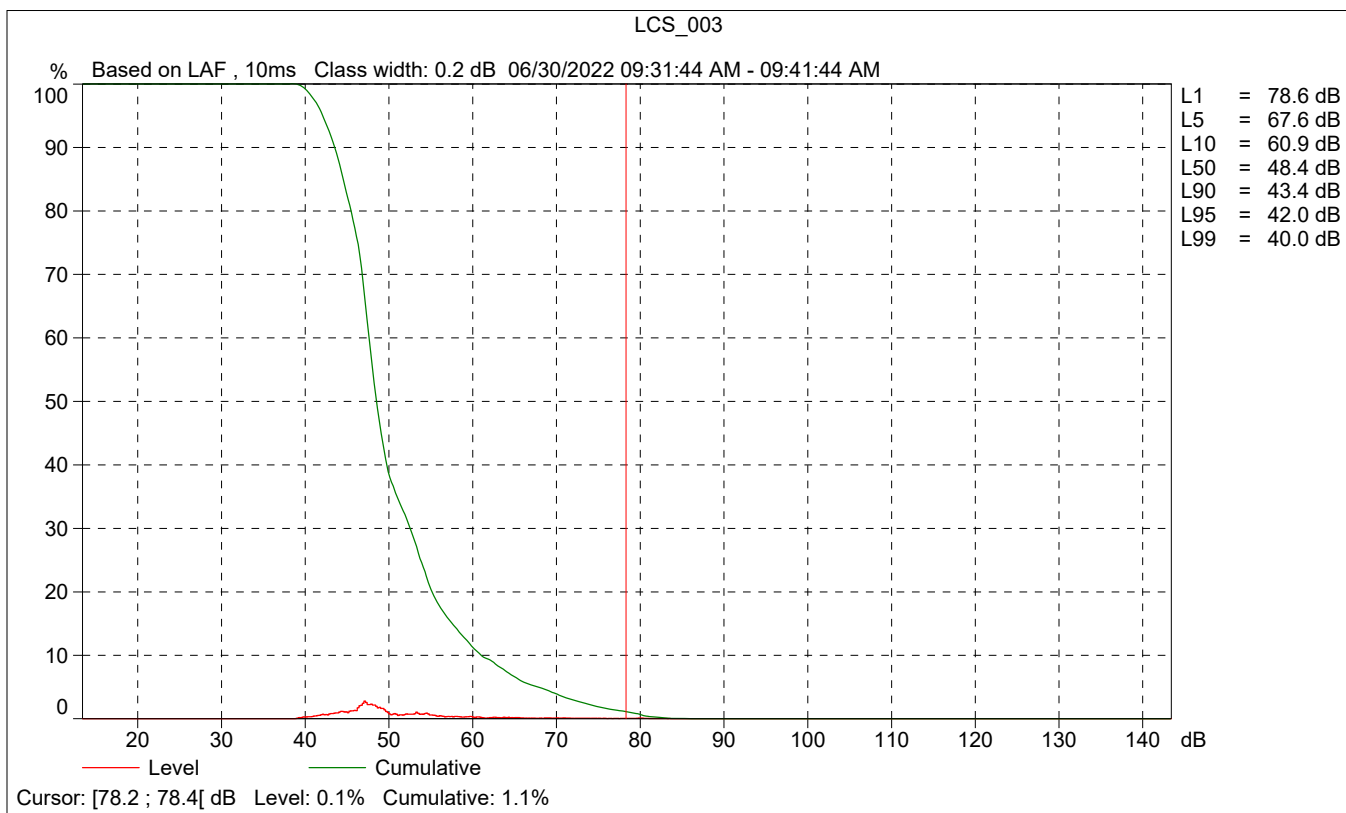
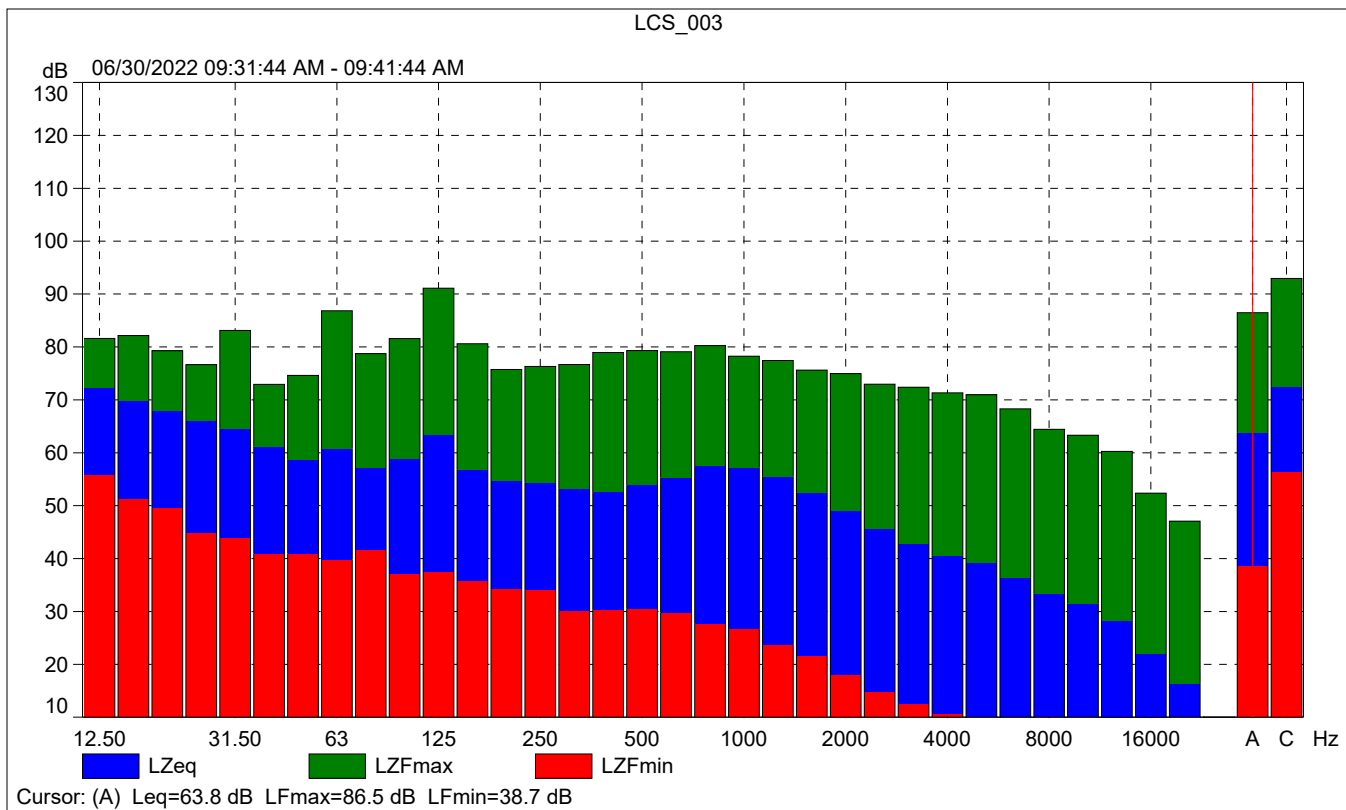
	Time	Frequency
Broadband (excl. Peak):	FSI	AC
Broadband Peak:		C
Spectrum:	FS	Z

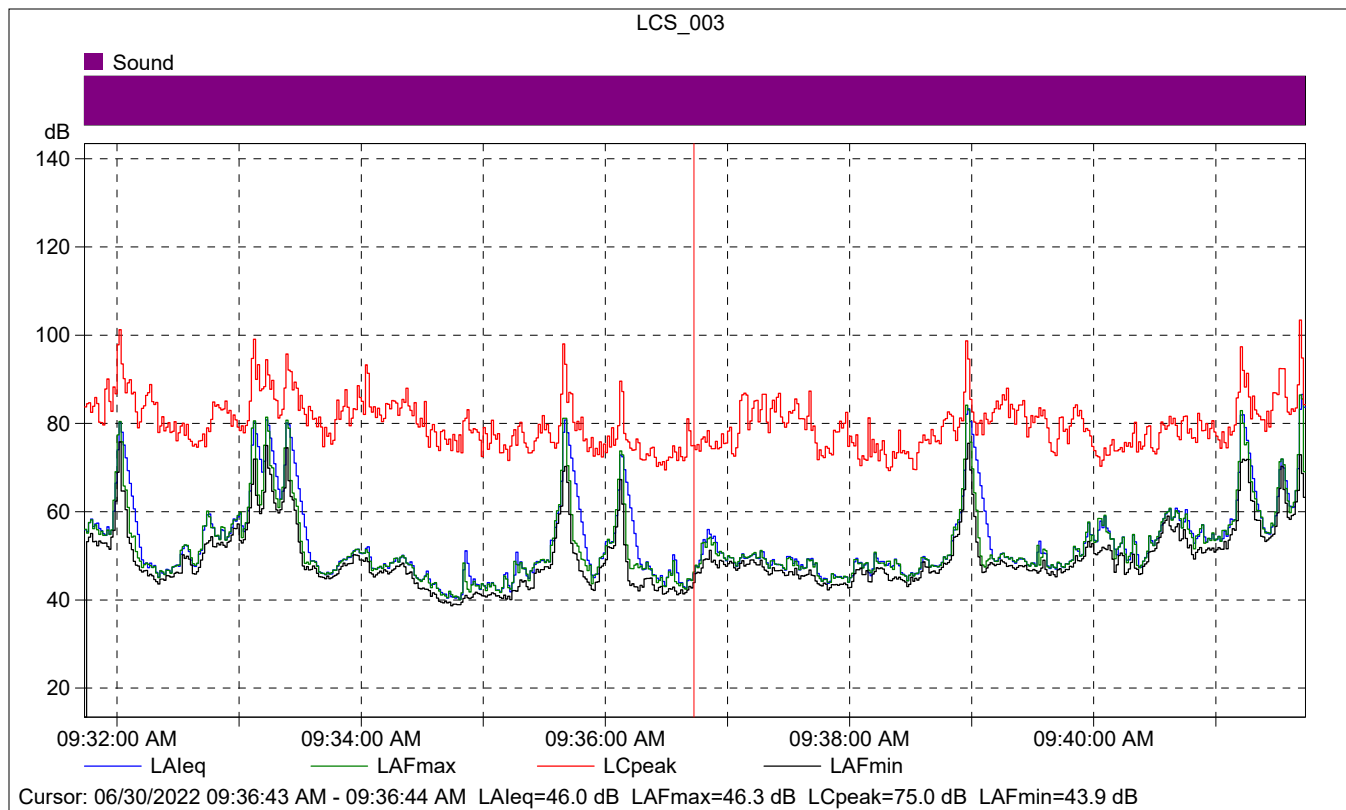
Instrument Serial Number:		3011133
Microphone Serial Number:		3086765
Input:		Top Socket
Windscreen Correction:		UA-1650
Sound Field Correction:		Free-field

Calibration Time:		06/30/2022 05:40:54
Calibration Type:		External reference
Sensitivity:		43.5336418449879 mV/Pa

LCS_003

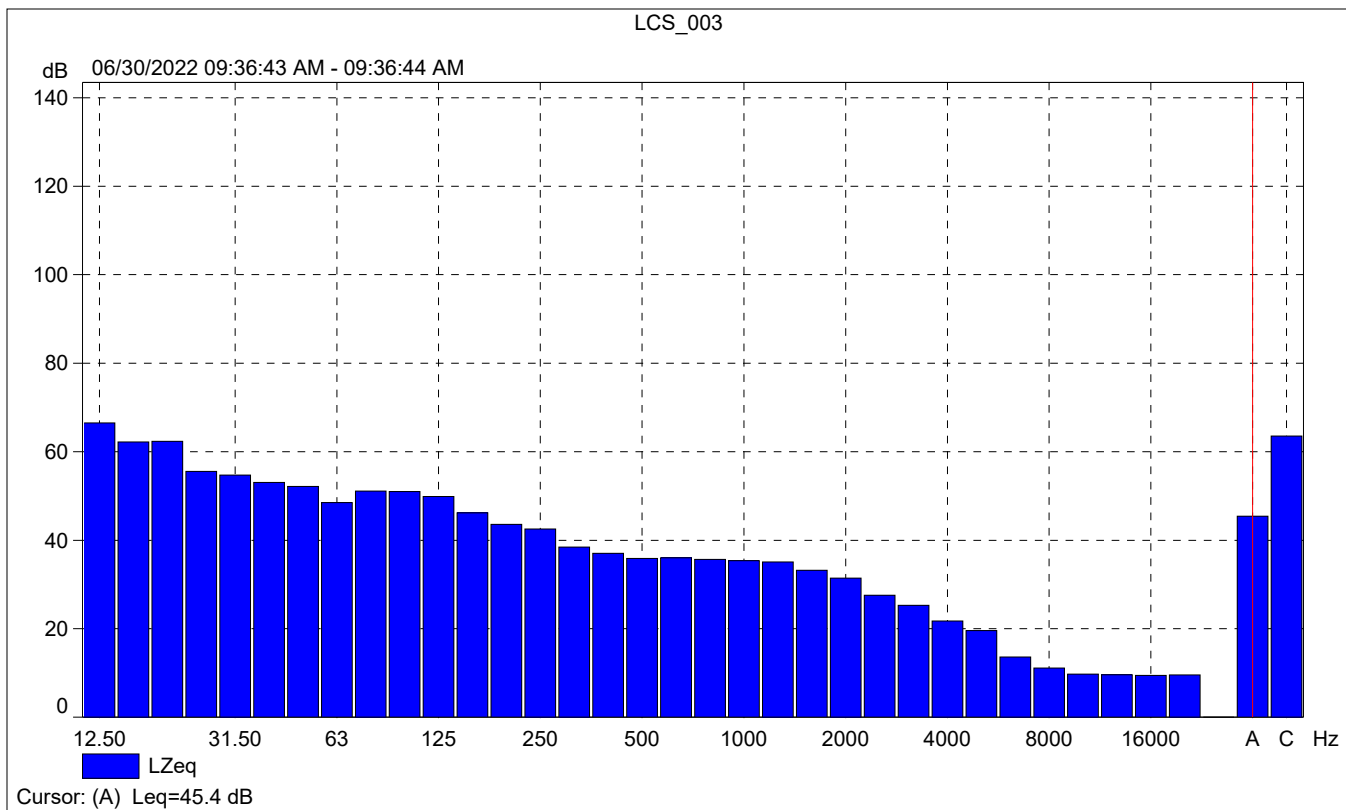
	Start time	End time	Elapsed time	Overload [%]	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value				0.00	63.8	86.5	38.7
Time	09:31:44 AM	09:41:44 AM	0:10:00				
Date	06/30/2022	06/30/2022					





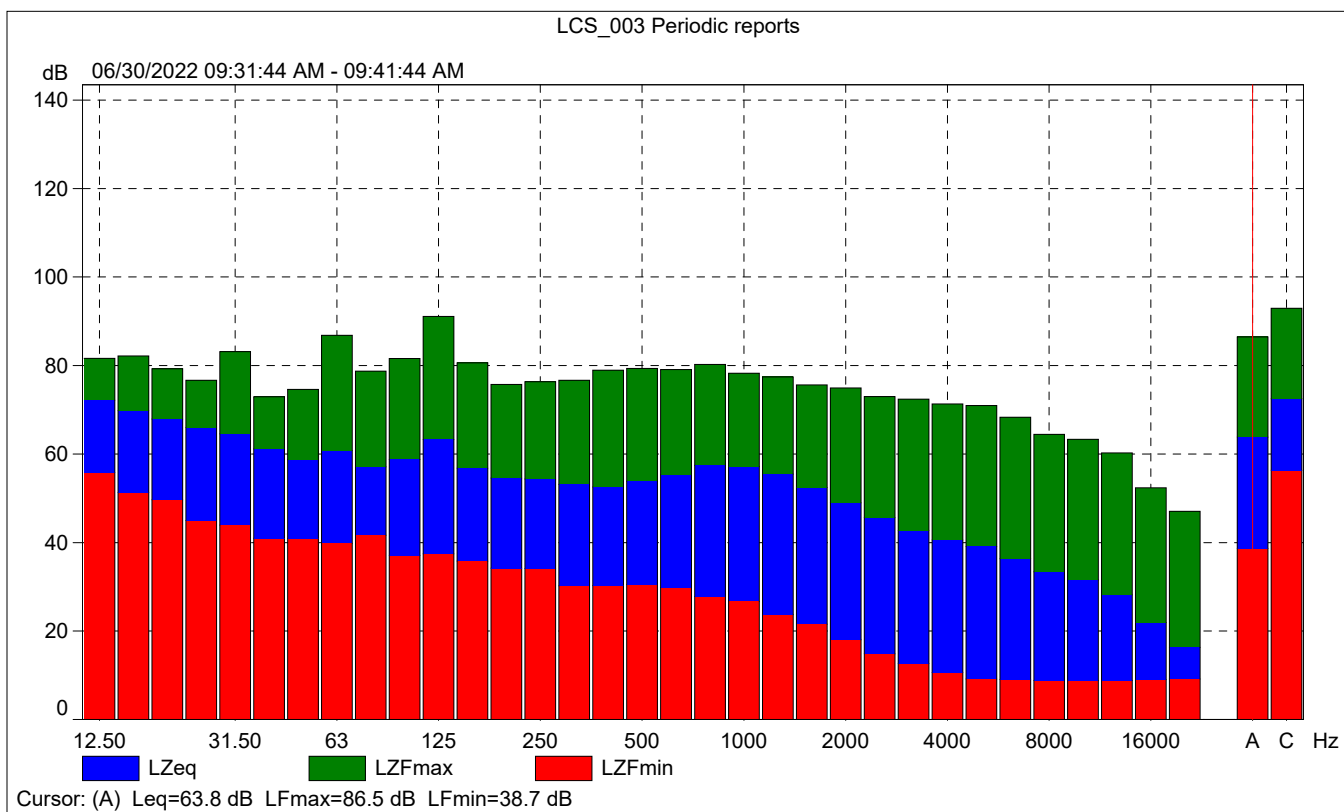
LCS_003

	Start time	Elapsed time	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			46.0	46.3	43.9
Time	09:36:43 AM	0:00:01			
Date	06/30/2022				



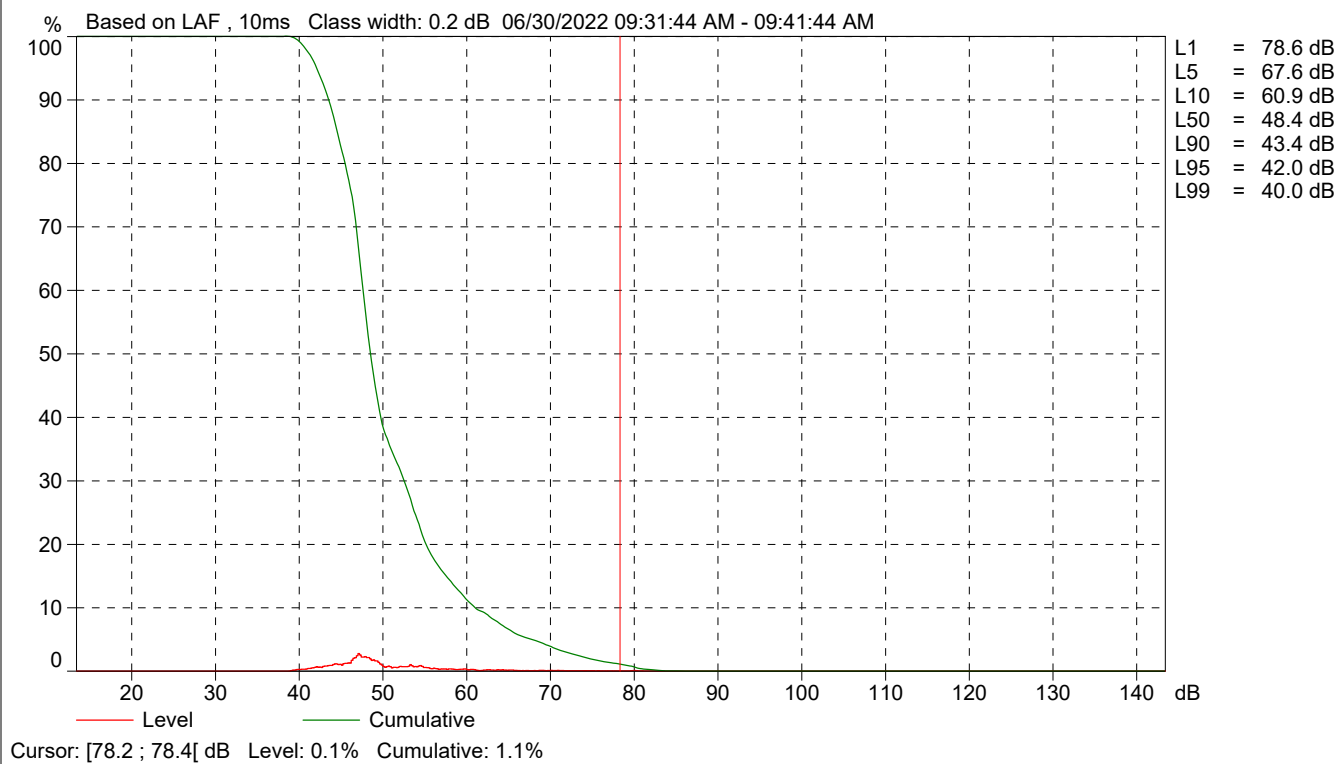
LCS_003 Periodic reports

	Start time	Elapsed time	Overload [%]	LAAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			0.00	67.8	86.5	38.7
Time	09:31:44 AM	0:10:00				
Date	06/30/2022					





LCS_003 Periodic reports



Site Number: NM-4			
Recorded By: Tina Yuan, Winnie Woo			
Job Number: 188955			
Date: 6/30/2022			
Time: 9:56 a.m.			
Location: Northeast corner of East Avenue J 8 and 90 th Street East			
Source of Peak Noise: Traffic along 90 th Street East			
Noise Data			
Leq (dB)	Lmax(dB)	Lmin (dB)	Peak (dB)
65.9	88.4	31.0	103.3

Equipment						
Category	Type	Vendor	Model	Serial No.	Cert. Date	Note
Sound	Sound Level Meter	Brüel & Kjær	2250	3011133	03/10/2022	
	Microphone	Brüel & Kjær	4189	3086765	03/10/2022	
	Preamp	Brüel & Kjær	ZC 0032	25380	03/10/2022	
	Calibrator	Brüel & Kjær	4231	2545667	03/10/2022	
Weather Data						
Est.	Duration: 10 minutes			Sky: Clear and Windy		
	Note: dBA Offset = -0.03			Sensor Height (ft): 5 ft		
	Wind Ave Speed (mph / m/s)		Temperature (degrees Fahrenheit)		Barometer Pressure (inches)	
	9 to 14		90.9		29.95	

Photo of Measurement Location





2250

Instrument:		2250
Application:		BZ7225 Version 4.7.6
Start Time:		06/30/2022 09:56:27
End Time:		06/30/2022 10:06:27
Elapsed Time:		00:10:00
Bandwidth:		1/3-octave
Max Input Level:		142.14

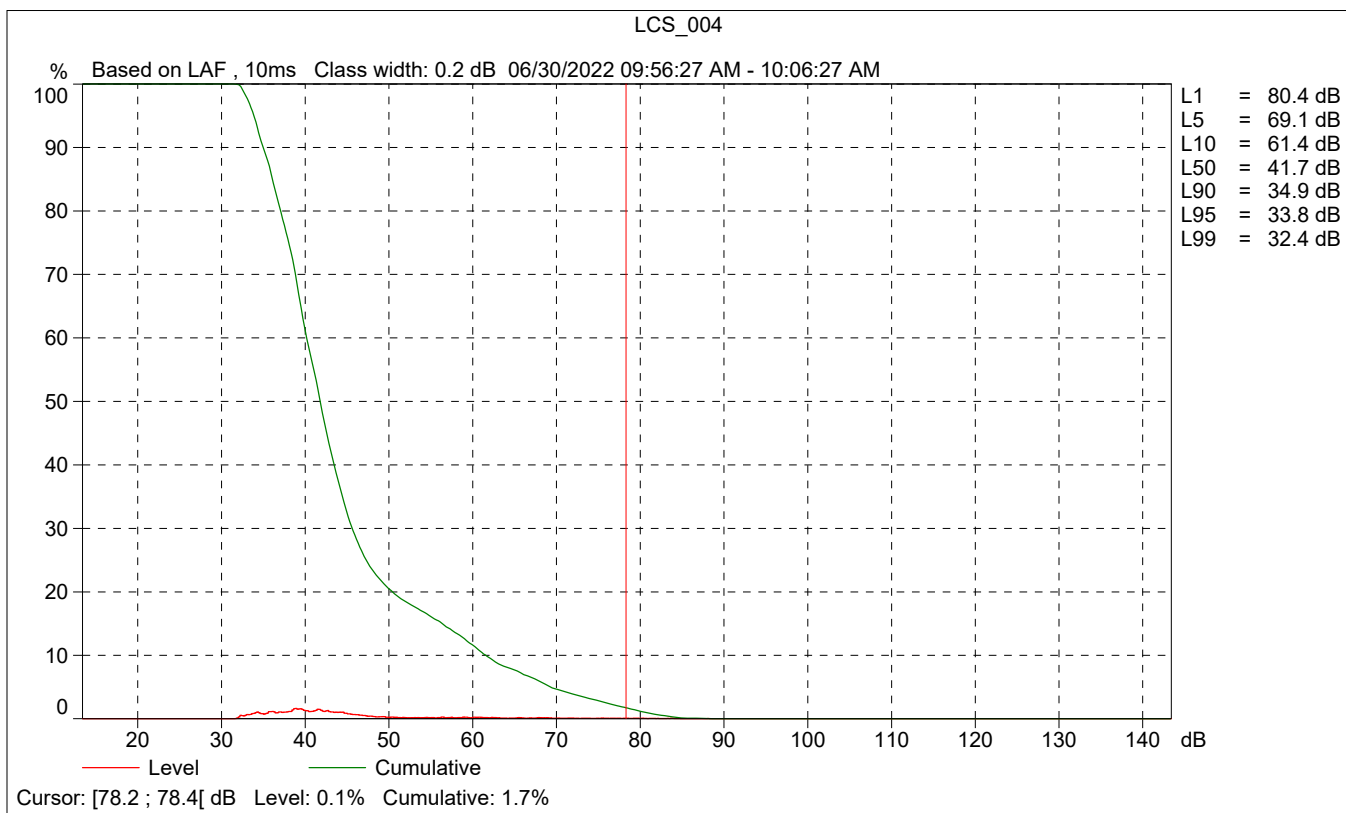
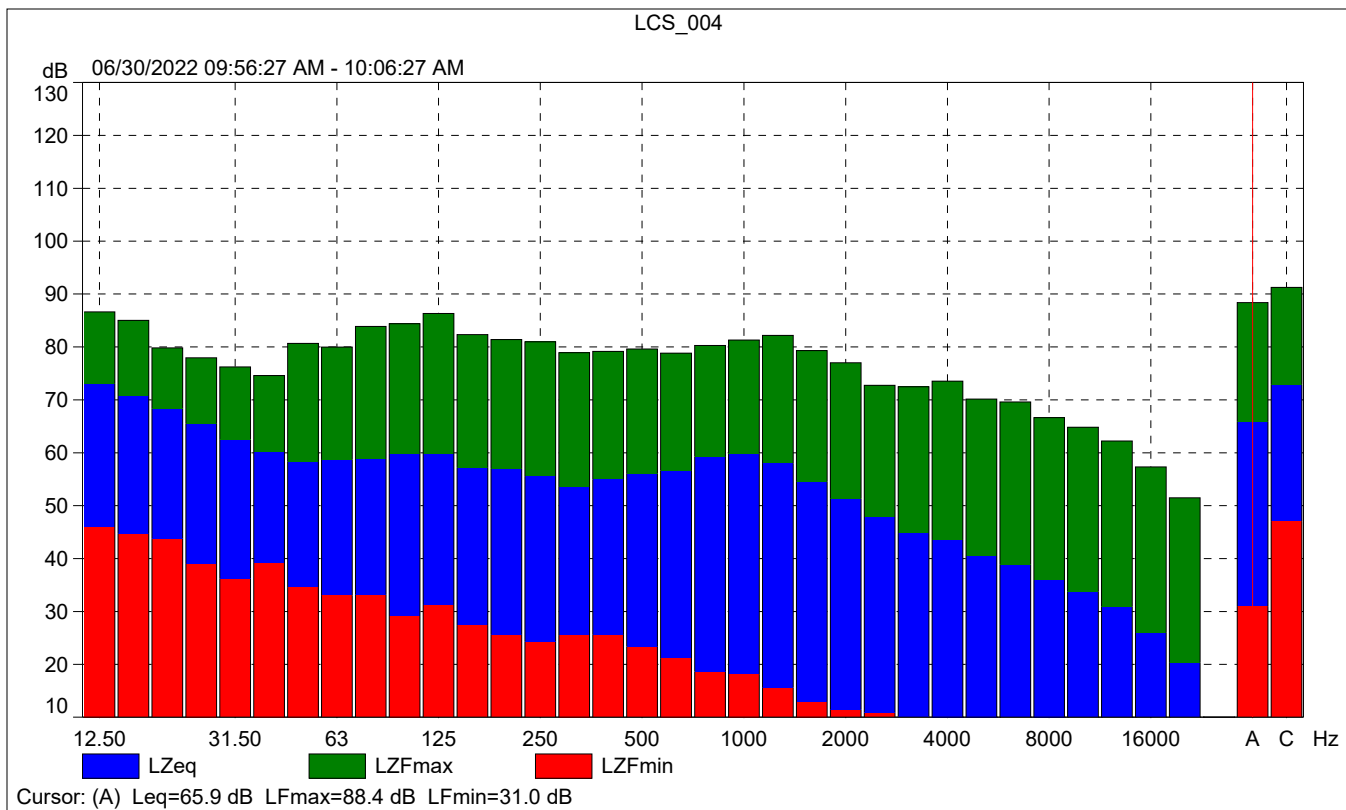
	Time	Frequency
Broadband (excl. Peak):	FSI	AC
Broadband Peak:		C
Spectrum:	FS	Z

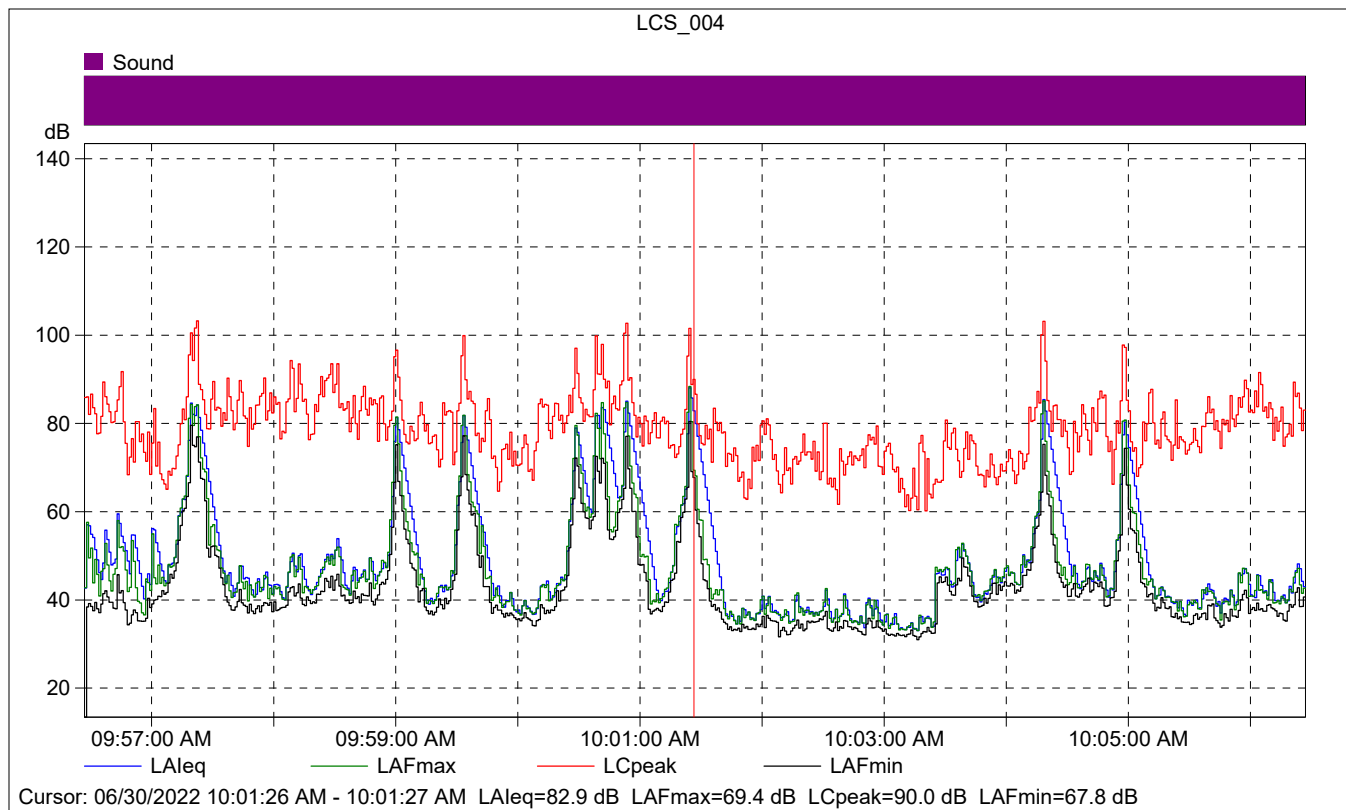
Instrument Serial Number:		3011133
Microphone Serial Number:		3086765
Input:		Top Socket
Windscreen Correction:		UA-1650
Sound Field Correction:		Free-field

Calibration Time:		06/30/2022 05:40:54
Calibration Type:		External reference
Sensitivity:		43.5336418449879 mV/Pa

LCS_004

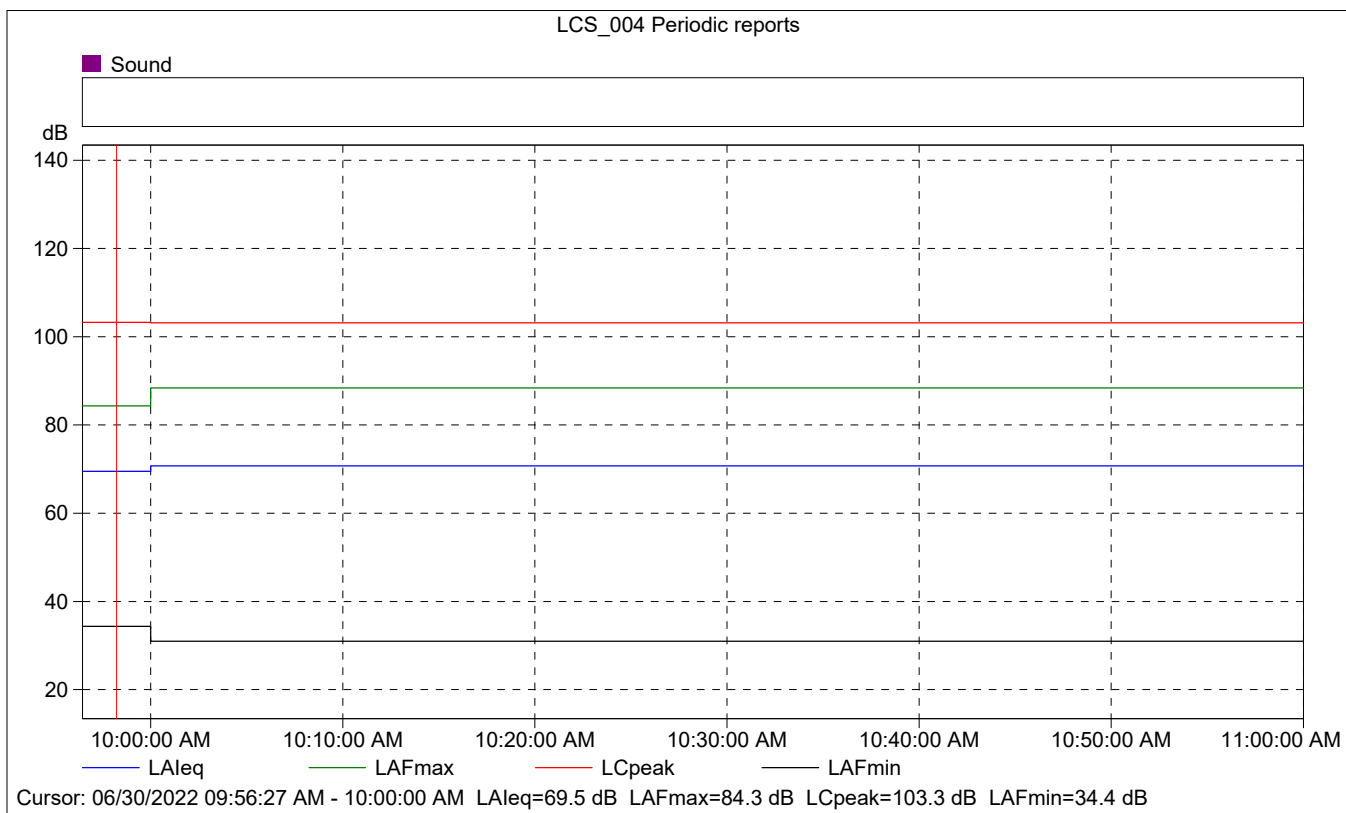
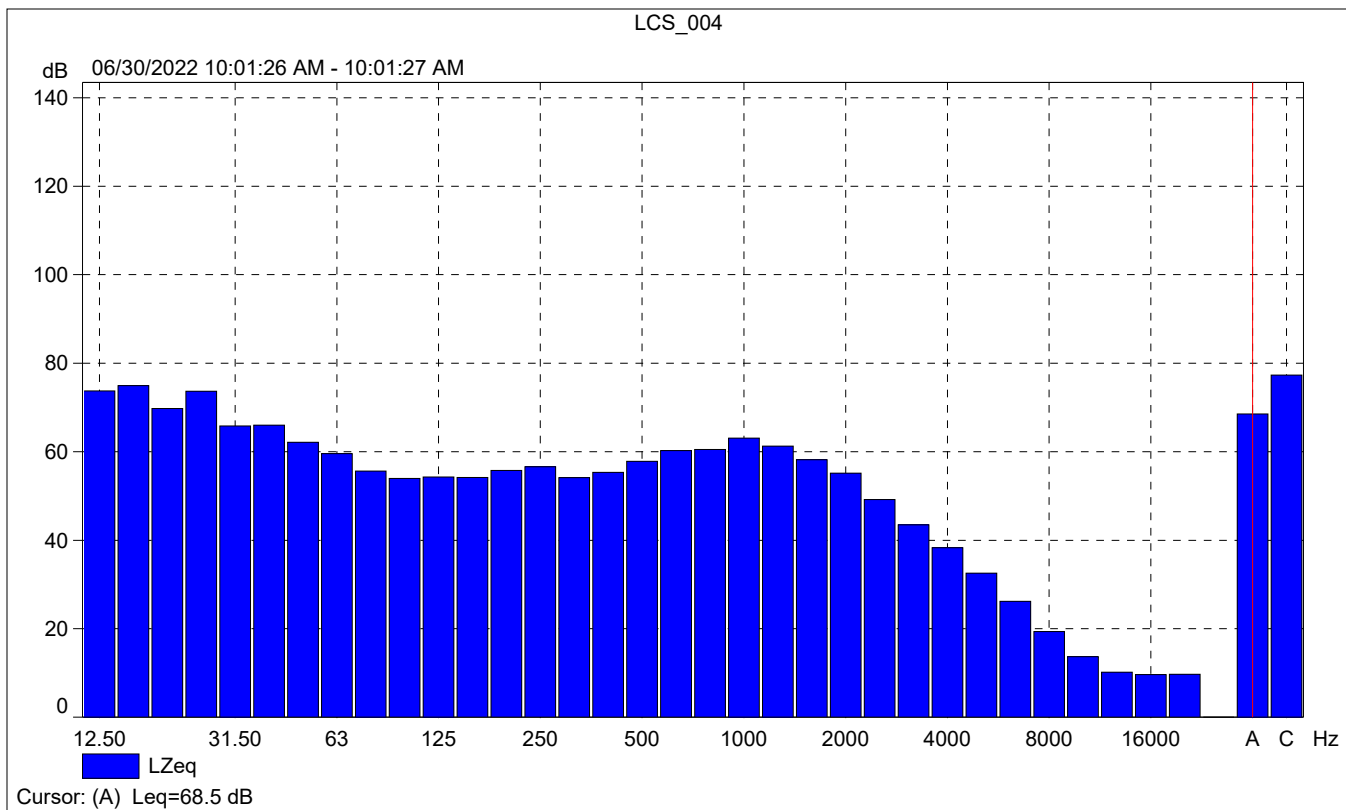
	Start time	End time	Elapsed time	Overload [%]	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value				0.00	65.9	88.4	31.0
Time	09:56:27 AM	10:06:27 AM	0:10:00				
Date	06/30/2022	06/30/2022					





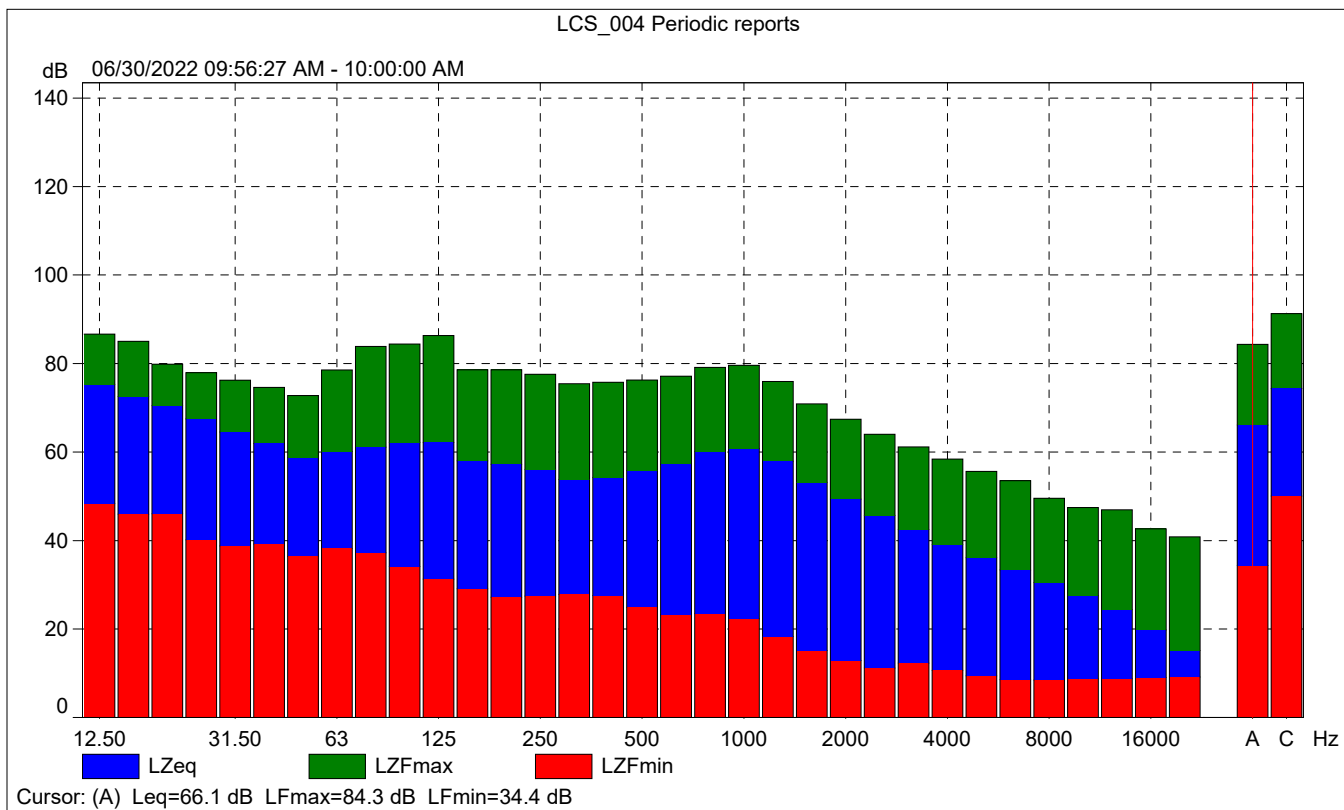
LCS_004

	Start time	Elapsed time	LAeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			82.9	69.4	67.8
Time	10:01:26 AM	0:00:01			
Date	06/30/2022				



LCS_004 Periodic reports

	Start time	Elapsed time	Overload [%]	LAFeq [dB]	LAFmax [dB]	LAFmin [dB]
Value			0.00	69.5	84.3	34.4
Time	09:56:27 AM	0:03:33				
Date	06/30/2022					





LCS_004 Periodic reports

