

## **APPENDIX A-1: NOTICE OF PREPARATION**

# Notice of Preparation of a Draft Environmental Impact Report

## Palmdale Water District

### 2023 Strategic Water Resources Plan Update

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Date: August 14, 2023

To: Responsible and Trustee Agencies/ County Clerk/ Interested Organizations and Individuals

Project: 2023 Strategic Water Resources Plan Update Environmental Impact Report

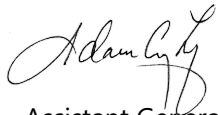
Lead Agency: Palmdale Water District  
2029 East Avenue Q, Palmdale CA 93550  
Contact: Adam C. Ly, Assistant General Manager, (661)456-1062  
[aly@palmdalewater.org](mailto:aly@palmdalewater.org)

Palmdale Water District (PWD) has developed a Strategic Water Resources Plan Update (Plan Update) to provide a sound water supply strategy to meet customer demands through 2050. As part of this effort, PWD will complete an Environmental Impact Report (EIR) according to the regulations in the California Environmental Quality Act (CEQA). This notice is being sent to agencies, organizations, and individuals that PWD believes may have an interest in the scope of the environmental analysis. PWD is particularly soliciting this input from those stakeholders who may rely on the EIR for consideration of their own permitting and project approvals.

PWD will be the Lead Agency (per CEQA Guidelines sections 15050 and 15051[b]) and will prepare the EIR for the Plan Update. PWD requests written comments related to the scope and content of the environmental information which is germane to your interests or statutory responsibilities in connection with the Plan Update. The project description, location, and the potential environmental effects are contained in the attached materials. CEQA Guidelines section 15063(a) provides that if a Lead Agency determined that an EIR will clearly be required for a project, an Initial Study is not required. Therefore, an Initial Study is not attached.

The review period for this NOP is **August 14, 2023 to September 15, 2023**. Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice. A scoping meeting will be held to provide the public an overview of information contained within this NOP and to solicit written comments on the content of the Draft EIR. The scoping meeting will be held on **Thursday, September 7 2023 from 5:00 p.m. until 6:30 p.m.** at the PWD Headquarters, located at 2029 East Avenue Q in the City of Palmdale. Written comments can be submitted at the scoping meeting or sent to Adam Ly, PWD Assistant General Manager, at the address shown above. Please include the name, phone number, and address of a contact person in your response.

Signature



Title: Assistant General Manager

**Project Location:**

The Plan Update is located throughout Palmdale Water District's (PWD) 47-square mile service area in the Antelope Valley area of Los Angeles County, California. A portion of the Palmdale Ditch component of the Project extends south of the PWD service area and a portion of the conveyance facilities to the Upper Amargosa Creek Water Recharge Project extend north of the PWD service area in unincorporated Los Angeles County, California (Figure 1). The project site is located in the Palmdale and Ritter Ridge U.S. Geological Survey (USGS) 7.5-minute quadrangles (Figure 2).

**Project Description:**

PWD has developed the Plan Update to provide a sound water supply strategy to meet customer demands through 2050. Water use by existing and future PWD customers is expected to grow through 2050. At the same time, substantial periods of drought have significantly impacted water resources throughout the State of California, resulting in reduced imported water allocations and increased water use efficiency. The Plan Update presents a Preferred Strategy that includes proposed actions for maximizing local supplies and facilities and increasing water storage in the Antelope Valley Groundwater Basin to meet demands during times of imported water shortage (Figure 3). PWD will prepare a Program EIR that analyzes the potential effects on the environment associated with implementation of the Plan Update's Preferred Strategy (proposed Project).

The Plan Update's Preferred Strategy consists of the following implementation actions:

***Imported Supplies***

Under the Preferred Strategy, PWD would maximize its existing Table A allocations by recharging imported water that is not treated and used to meet potable demands directly. Up to 1,600 acre-feet (AF) to the Antelope Valley Groundwater Basin each year (as described further in the following section). Imported water beyond existing contracts will not be purchased. Existing turnouts, conveyance, recharge and treatment will be used to maximize existing imported water supplies.

***Upper Amargosa Creek Water Recharge Project***

Under the Preferred Strategy, PWD would increase recharge through the Upper Amargosa Creek Water Recharge Project (UAP). This includes 1,600 acre-feet per year (AFY) of imported water recharged into the Antelope Valley Groundwater Basin. The environmental impacts of the UAP were evaluated in an EIR (State Clearinghouse (SCH)# 2008091061) that was adopted by the City of Palmdale in 2009. A Supplemental EIR was adopted in 2018 that evaluated a change in turnout location and pipeline alignment. Construction of the UAP was completed in December 2019.

***Groundwater Injection***

Under the Preferred Strategy, PWD would store recycled water in the Antelope Valley Basin via injection. 5,000 AFY of recycled water would be injected into the Antelope Valley Groundwater Basin each year. Up to five (5) new recycled water injection wells would be needed. The location of the recycled water injection wells is yet to be determined but would be within the vicinity of the Palmdale Water Reclamation Facility (WRF) (see Figure 3). To increase recycled water recharge into the Antelope Valley Groundwater Basin via injection, additional recycled water conveyance pipelines would be needed between the Palmdale WRF and the new injection wells. Conveyance pipeline locations are yet to be determined but would be constructed within existing roadways whenever possible. To increase imported water recharge, no new injection wells or conveyance pipelines would be needed; PWD would use the existing UAP infrastructure.

**Groundwater Extraction**

Under the Preferred Strategy, PWD would construct new wells to pump the banked water and connect to the existing distribution system for use during dry or drought periods. In addition, PWD would purchase 1,000 AFY of groundwater production rights from other pumpers in the Antelope Valley Groundwater Basin. In total, seven (7) new wells would be drilled and equipped to extract the purchased groundwater rights and to extract the recharged water (assuming a well capacity of 2 million gallons per day). The location of the new wells is shown in Figure 3. Conveyance pipeline locations are yet to be determined but would be constructed within existing roadways whenever possible.

**Existing Wells Rehabilitation and/or Replacement**

PWD currently operates 21 groundwater wells in the Antelope Valley Basin with a maximum pumping volume of approximately 11,000 AFY. Under this option, PWD would rehabilitate and/or replace the existing PWD wells to maintain existing pumping capacity and enable greater pumping during dry years. Implementation of this component would improve the resilience of the production wells to maintain baseline groundwater pumping capacity. Under the Preferred Strategy, PWD would proceed with the rehabilitation and replacement of its wells as recommended in the 2020 Well Rehabilitation Prioritization Program to maintain current pumping capacity, which includes replacement of five (5) existing wells. Replacement wells would occur in the same physical location as existing wells.

**Pure Water Antelope Valley**

Under the Preferred Strategy, PWD would maximize beneficial use of recycled water through construction and implementation of an approximately 5 million gallon per day advanced water treatment plant, referred to as Pure Water Antelope Valley (AV). The Pure Water Antelope Valley project is conceptual in both location and capacity and CEQA evaluation is anticipated in the future.

**Littlerock Reservoir Sediment Removal**

Littlerock Reservoir is a man-made feature formed by the impoundment of water by the Littlerock Dam. The initial design capacity of Littlerock Reservoir was 4,300 AF; however, this capacity was substantially reduced to approximately 1,600 AF because of the deposition of sediment behind Littlerock Dam. In 1992, the height of Littlerock Dam was raised to restore storage capacity to 3,500 AF. Since then, sedimentation has further reduced storage capacity, thus limiting an equivalent amount of local supply storage. The Preferred Strategy includes sediment removal at Littlerock Reservoir in order to maintain storage capacity. This project was evaluated separately at the project level in accordance with CEQA (SCH# 2005061171) and adopted by Palmdale Water District in 2017.

**Palmdale Ditch Improvement Project**

The Palmdale Ditch is a 7.2-mile long part earthen and part concrete-lined open ditch that conveys water from Littlerock Dam Reservoir to Lake Palmdale. It is estimated that up to 25 percent of water supplies are lost due to evaporation and seepage from the ditch. To reduce conveyance losses and increase local water supply, PWD would enclose the Palmdale Ditch by constructing one to two miles of pipe within the Palmdale Ditch. See Figure 3.

**Probable Environmental Effects:**

The following is a list of the subject areas that will be analyzed in detail in the EIR:

- Air Quality
- Agricultural and forestry resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Paleontological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/ Water Quality
- Noise
- Tribal Cultural Resources

Topics that are expected to be included in the effects found not significant discussion of the EIR are aesthetics/visual quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

**Public Scoping Meeting:**

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit written comments on the content of the Draft EIR. The meeting will be held on Thursday, September 7, 2023 from 5:00 p.m. until 6:30 p.m. at Palmdale Water District, located at 2029 East Avenue Q. Please contact Adam Ly at the Palmdale Water District for more information.

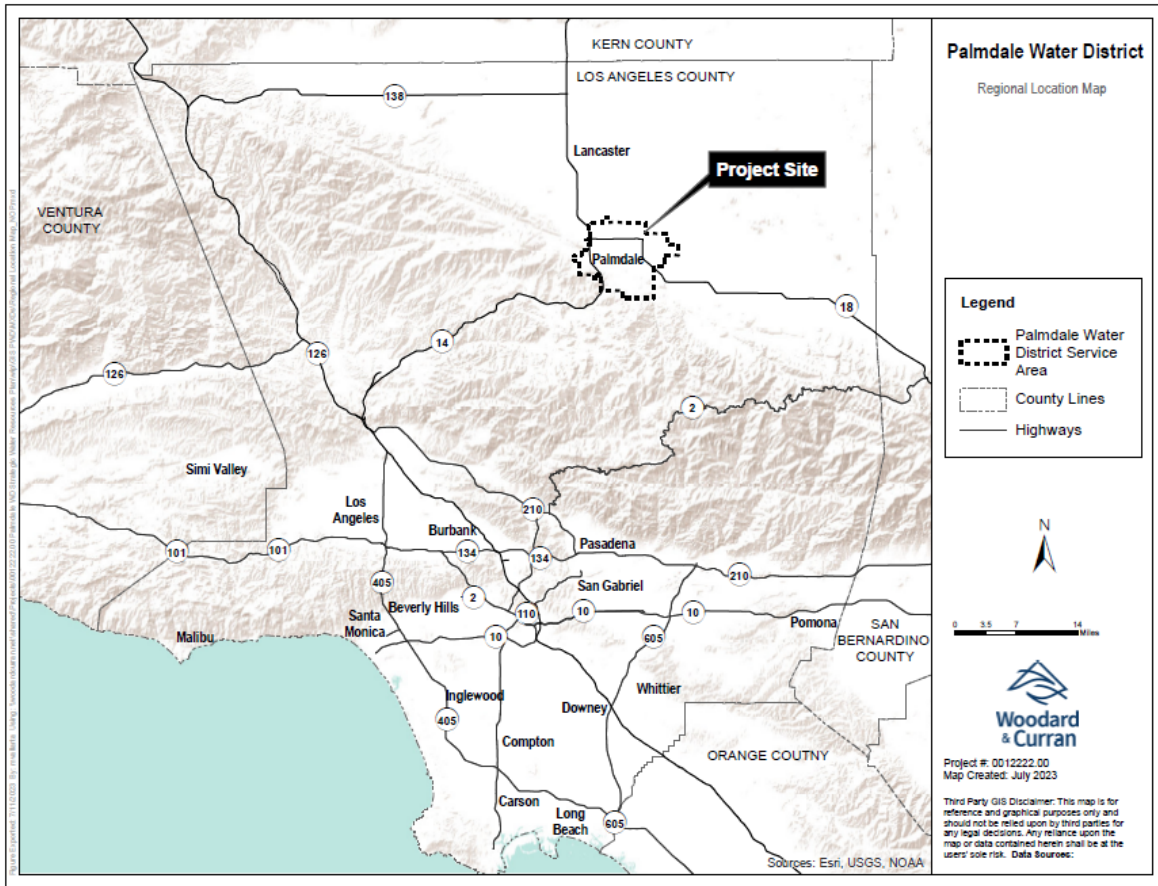
**Attachments:**

Figure 1: Regional Location Map

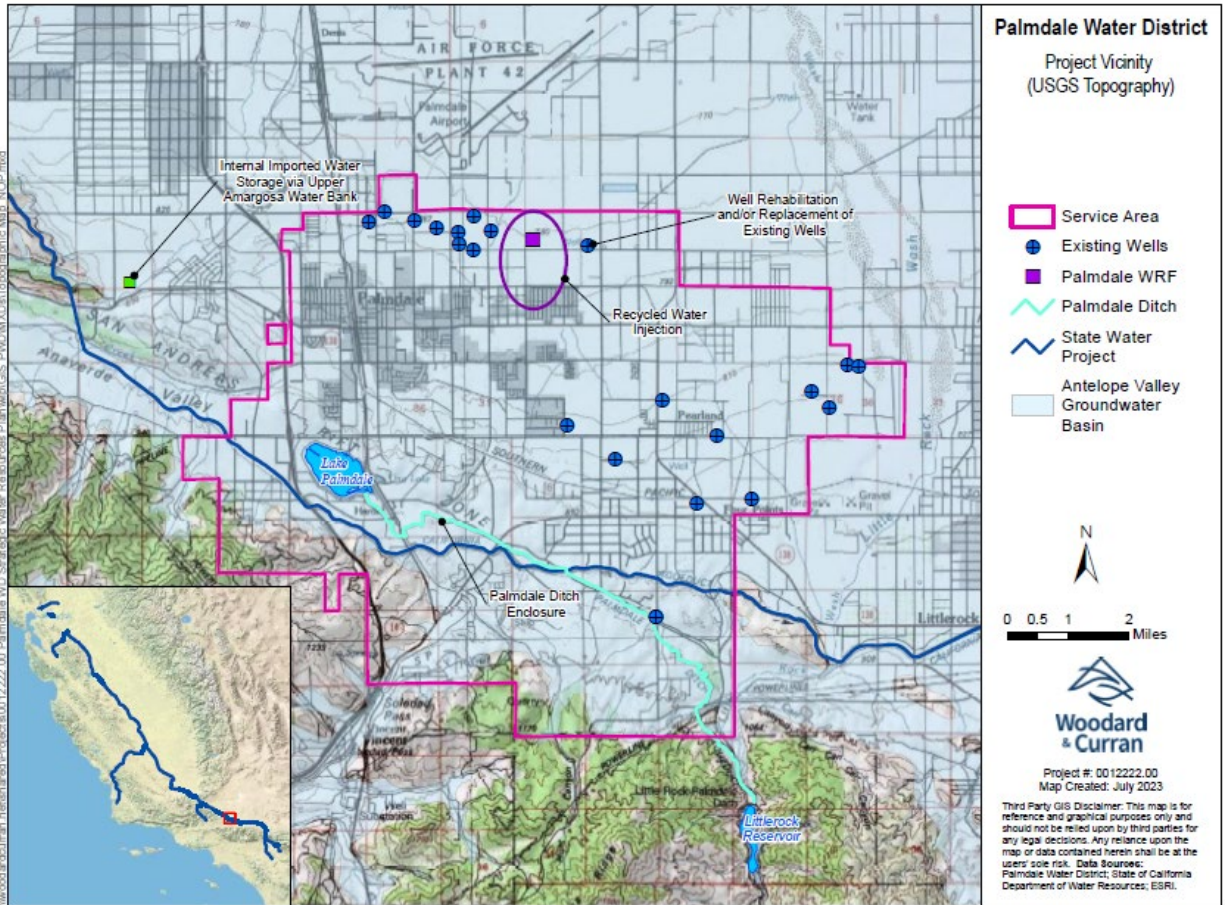
Figure 2: Project Vicinity (USGS Topography)

Figure 3: Aerial Photograph

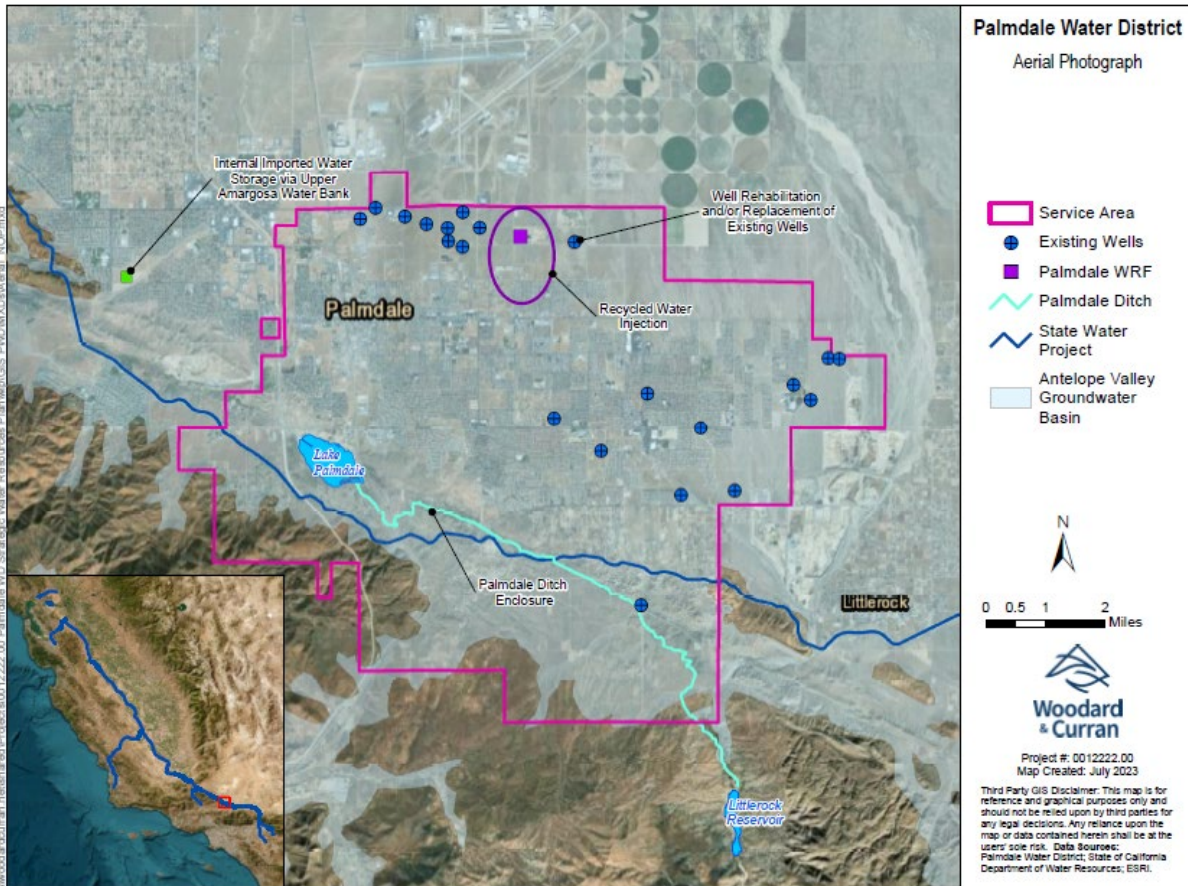
**FIGURE 1: REGIONAL LOCATION**



**FIGURE 2: PROJECT VICINITY (USGS TOPOGRAPHY)**



**FIGURE 3: AERIAL PHOTOGRAPH**





## **APPENDIX A-2: NOP PUBLIC COMMENTS**

# NATIVE AMERICAN HERITAGE COMMISSION

August 14, 2023

Governor's Office of Planning & Research

**Aug 18 2023**

**STATE CLEARINGHOUSE**

Adam C. Ly  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, CA 93550

**Re: 2023080290, 2023 Strategic Water Resources Plan Update Environmental Impact Report Project, Los Angeles County**

Dear Mr. Ly:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

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

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

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**



CHAIRPERSON  
**Reginald Pagaling**  
Chumash

VICE-CHAIRPERSON  
**Buffy McQuillen**  
Yokayo Pomo, Yuki,  
Nomlaki

SECRETARY  
**Sara Dutschke**  
Miwok

PARLIAMENTARIAN  
**Wayne Nelson**  
Luiseño

COMMISSIONER  
**Isaac Bojorquez**  
Ohlone-Costanoan

COMMISSIONER  
**Stanley Rodriguez**  
Kumeyaay

COMMISSIONER  
**Vacant**

COMMISSIONER  
**Vacant**

COMMISSIONER  
**Vacant**

EXECUTIVE SECRETARY  
**Raymond C. Hitchcock**  
Miwok, Nisenan

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
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California 95691  
(916) 373-3710  
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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a.** A brief description of the project.
  - b.** The lead agency contact information.
  - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
  - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a.** Alternatives to the project.
  - b.** Recommended mitigation measures.
  - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a.** Type of environmental review necessary.
  - b.** Significance of the tribal cultural resources.
  - c.** Significance of the project's impacts on tribal cultural resources.
  - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

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

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

### NAHC Recommendations for Cultural Resources Assessments

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

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

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

Sincerely,



Andrew Green  
Cultural Resources Analyst

cc: State Clearinghouse

## Arthella Vallarta

---

**From:** Adam Ly <aly@palmdalewater.org>  
**Sent:** Tuesday, August 29, 2023 11:37 AM  
**To:** Kim Clyma; Haley Johnson; Arthella Vallarta  
**Cc:** Brian Van Lienden; Judy Shay  
**Subject:** FW: 2023 Strategic Water Resources Plan Update, Palmdale Water District, Palmdale, CA

Hello,

Just got this email today.

Thank you.

**Adam C. Ly**

*Assistant General Manager*



PALMDALE WATER DISTRICT

2029 East Avenue Q, Palmdale, CA 93550

d: 661-456-1062 c: 562-417-8841

[aly@palmdalewater.org](mailto:aly@palmdalewater.org) • [www.palmdalewater.org](http://www.palmdalewater.org)



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**From:** Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>  
**Sent:** Tuesday, August 29, 2023 11:35 AM  
**To:** Adam Ly <aly@palmdalewater.org>  
**Subject:** RE: 2023 Strategic Water Resources Plan Update, Palmdale Water District, Palmdale, CA

**CAUTION:** This email originated from outside of PWD. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Adam Ly,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) regarding the above referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on August 16<sup>th</sup>, 2023, pursuant to CEQA (as amended, 2015) and CA PRC 21080.3.1. This effort may impact projects located within Serrano ancestral territory, and therefore, is of interest to the Tribe. At this time, YSMN is requesting additional information:

- Will there be any planned or potential future development as a result of this plan update that will expand the current development / ground disturbance footprint of the District's infrastructure and facilities?
- Will this plan update exempt future projects from CEQA review?
- Will the Tribe continue to receive initial notices for projects within the District?

Please note that if this information cannot be provided within the Tribe's 30-day response window, the Tribe automatically elects to be a consulting party under CEQA, as stipulated in AB52. If you should have any questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Best

Jamie

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

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**From:** [Adam Ly](#)  
**To:** [Kim Clyma](#); [Haley Johnson](#); [Arthella Vallarta](#)  
**Cc:** [Brian Van Lienden](#)  
**Subject:** FW: 2023 Strategic Water Resources Plan Update, Palmdale Water District, Palmdale, CA  
**Date:** Wednesday, September 13, 2023 11:00:43 AM  
**Attachments:** [image001.png](#)  
[image004.png](#)

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Hi,

Here's the reply from Jaime. Can you get me a response?

Thanks.

**Adam C. Ly**

*Assistant General Manager*



**PALMDALE WATER DISTRICT**

2029 East Avenue Q, Palmdale, CA 93550

d: 661-456-1062 c: 562-417-8841

[aly@palmdalewater.org](mailto:aly@palmdalewater.org) • [www.palmdalewater.org](http://www.palmdalewater.org)



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**From:** Jamie Nord <Jamie.Nord@sanmanuel-nsn.gov>  
**Sent:** Wednesday, September 13, 2023 10:04 AM  
**To:** Adam Ly <aly@palmdalewater.org>  
**Subject:** RE: 2023 Strategic Water Resources Plan Update, Palmdale Water District, Palmdale, CA

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Hello Adam,

Thank you for the information. I have a few additional questions.

- Will the District be inviting Yuhaaviatam of San Manuel Nation to consult on this project under AB 52 of CEQA? We have received the NOP but not a formal invitation for tribal consultation.
- Will the future projects proposed in this plan use this EIR as the base environmental review? If so, the Tribe would be very interested in consulting on this project, since the entire service area encompasses numerous cultural and archaeological resources that are significant to the Tribe. We would be interested in providing proposed mitigation measures for Cultural Resources and Tribal Cultural Resources to be included in the EIR for future projects to implement.
- Additionally, can you please provide the following information if required for the project / upon availability:
  - Cultural report
  - Geotechnical report (if required for the project)
  - Project plans showing the depth of the proposed disturbance

We look forward to continuing this discussion, and hopefully engaging in government-to-

government consultation in the near future. Have a nice day.

Sincerely,  
Jamie Nord  
Tribal Archaeologist

---

**From:** Adam Ly <[aly@palmdalewater.org](mailto:aly@palmdalewater.org)>  
**Sent:** Tuesday, September 12, 2023 4:57 PM  
**To:** Jamie Nord <[Jamie.Nord@sanmanuel-nsn.gov](mailto:Jamie.Nord@sanmanuel-nsn.gov)>  
**Subject:** RE: 2023 Strategic Water Resources Plan Update, Palmdale Water District, Palmdale, CA

Hi Jamie,

Attached is our responses to your questions. If you have additional comments, feel free to let me know.

Thank you very much.

**Adam C. Ly**  
*Assistant General Manager*



PALMDALE WATER DISTRICT  
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---

**From:** Jamie Nord <[Jamie.Nord@sanmanuel-nsn.gov](mailto:Jamie.Nord@sanmanuel-nsn.gov)>  
**Sent:** Tuesday, August 29, 2023 11:35 AM  
**To:** Adam Ly <[aly@palmdalewater.org](mailto:aly@palmdalewater.org)>  
**Subject:** RE: 2023 Strategic Water Resources Plan Update, Palmdale Water District, Palmdale, CA

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Hello Adam Ly,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly known as the San Manuel Band of Mission Indians) regarding the above referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on August 16<sup>th</sup>, 2023, pursuant to CEQA (as amended, 2015) and CA PRC 21080.3.1. This effort may impact projects located within Serrano ancestral territory, and therefore, is of interest to the Tribe. At this time, YSMN is requesting additional information:

- Will there be any planned or potential future development as a result of this plan update that will expand the current development / ground disturbance footprint of the District's infrastructure and facilities?
- Will this plan update exempt future projects from CEQA review?

Will the Tribe continue to receive initial notices for projects within the District?  
Please note that if this information cannot be provided within the Tribe's 30-day response window, the Tribe automatically elects to be a consulting party under CEQA, as stipulated in AB52. If you should have any questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Best  
Jamie

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**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

September 7, 2023

Adam C. Ly, Assistant General Manager  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, CA 93550

RE: 2023 Strategic Water Resources  
Plan Update  
SCH #2023080290  
GTS #07-LA-2023-04290  
Vic. LA-14/LA-138 Multiple

Dear Adam C. Ly:

Palmdale Water District (PWD) has developed the Strategic Water Resources Plan Update to provide a sound water supply strategy to meet customer demands through 2050. The proposed actions aim to maximize local supplies and facilities while increasing water storage in the Antelope Valley Groundwater Basin by replacing the existing PWD wells and adding new wells or conveyance pipelines wherever needed.

After reviewing the NOP, Caltrans has the following comments:

Caltrans recommends a discussion of potential construction truck trips in the Transportation section of the Draft Environmental Impact Report (DEIR). Although near-future planning is currently being finalized, we recommend disclosing construction trips for the public's understanding. Caltrans planners and engineers are available to partner on implementing construction management plans to preserve safety and mobility throughout the Plan area. It is also encouraged that the Lead Agency utilizes different colors to highlight State facilities like California State Route 14 and 138 for better visibility in Figures 2 and 3.

As a reminder, the mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts

of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects.

Caltrans' targets of tripling trips made by bicycle, doubling trips made by walking and public transit, and a 15% reduction in statewide VMT can be achieved with connectivity improvements to the state-wide transportation network. By removing barriers to walking, biking, and taking transit, this Plan can engage Californians in shifting towards transit-oriented communities, and help the State meet its policy goals to reduce the number of trips made by driving, Greenhouse Gas (GHG) emissions, and sustainably provide for multimodal transport options.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS #07-LA-2023-04290.

Sincerely,



MIYA EDMONSON  
LDR/CEQA Branch Chief

email: State Clearinghouse



Rosamond Community Services District

## ROSAMOND COMMUNITY SERVICES DISTRICT

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Kim Domingo, PE

September 12, 2023

Adam C. Ly, Assistant General Manager  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, CA 93550

Notice of Preparation – Draft EIR  
2023 Strategic Water Resources Plan Update

Dear Mr. Ly,

Thank you for the opportunity to review the Notice of Preparation for the referenced project.

The Rosamond CSD does not have any specific Draft EIR scope comments and looks forward to reviewing the Draft EIR when it is prepared.

Regards,

A handwritten signature in blue ink that reads 'Kim Domingo'.

Kim Domingo  
General Manager





STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newsom, Governor  
DEPARTMENT OF FISH AND WILDLIFE Charlton H. Bonham, Director

South Coast Region  
3883 Ruffin Road | San Diego, CA 92123  
wildlife.ca.gov

September 13, 2023

Adam Ly  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, CA 93550  
[ALy@palmdalewater.org](mailto:ALy@palmdalewater.org)

**Subject: Notification of Preparation of a Programmatic Environmental Impact Report for the 2023 Strategic Water Resources Plan Update, SCH #2023080290, Palmdale Water District, Los Angeles County**

Dear Adam Ly:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of a Programmatic Environmental Impact Report (PEIR) from the Palmdale Water District (PWD) for the 2023 Strategic Water Resources Plan Update (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

**CDFW's Role**

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

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, §21069; CEQA Guidelines, §15381). CDFW expects that it may

Adam Ly  
Palmdale Water District  
September 13, 2023  
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need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project Applicant obtain appropriate authorization under the Fish and Game Code.

### **Project Description and Summary**

**Objective:** The Project proposes a Plan Update to meet customer demands for water through 2050, maximize local supplies to facilities and increase water storage in the Antelope Valley Groundwater Basin. The proposed actions addressed in the Plan Update are: recharging of imported water, the Upper Amargosa Creek Water Recharge Project (UAP), ground water injection, groundwater extraction, replacement of existing wells, the Pure Water Antelope Valley Project, sediment removal from Littlerock Reservoir, and the Palmdale Ditch Improvement Project.

Imported Water: PWD aims to maximize its existing allocations by recharging imported water that is treated and used to meet potable demands. A maximum of 1,600 acre-feet of imported recharged water would be allocated to the Antelope Valley Groundwater Basin each year. To maximize imported water supplies, existing turnouts, conveyance, recharge, and treatment would be utilized. Imported water beyond PWD's existing contracts would not be purchased.

Upper Amargosa Creek Water Recharge Project: The UAP consists of a recharge facility and recharge basins that would increase recharge of imported water from the California Aqueduct. The 1,600 acre-feet per year (AFY) of imported water recharged into the Antelope Valley Groundwater Basin would be included in the UAP. The UAP was evaluated in a separate EIR that was adopted in 2009. Moreover, a supplemental EIR was adopted in 2018 that evaluated a change in turnout location and pipeline alignment. Streambed Alteration Agreement No. 1600-2015-0253-R5 is associated with the UAP and construction activities for the UAP was completed in 2019.

Groundwater Injection: Recycled water in the Antelope Valley Basin would be stored via an injection method. Approximately 5,000 AFY of recycled water would be injected into the Antelope Valley Groundwater Basin each year. To



Adam Ly  
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September 13, 2023  
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achieve this proposed action, five new recycled water injection wells would be required. In addition to new injection wells, additional recycled water conveyance pipelines would be installed between the Palmdale Water Reclamation Facility (WRF) and the new injection wells.

Groundwater Extraction: New wells would be constructed to pump the banked water and connect to an existing distribution system. Additionally, PWD would purchase 1,000 AFY of groundwater production rights from other pumpers in the Antelope Valley Groundwater Basin. A total of seven new wells, constructed within existing roadways, would be drilled and equipped to extract the purchased groundwater rights and recharged water. Conveyance pipelines will also need to be installed to implement extraction activities.

Existing Wells Rehabilitation and/or Replacement: Under this action, PWD would rehabilitate and/or replace the existing PWD wells. PWD would proceed with the rehabilitation and replacement of five existing wells as recommended in the 2020 Well Rehabilitation Prioritization Program to maintain current pumping capacity.

Pure Water Antelope Valley Project: PWD would construct an advanced water treatment plant to maximize use of recycled water. The Pure Water Antelope Valley Project has not yet undergone CEQA analysis.

Littlerock Reservoir Sediment Removal Project: The Project would implement sedimental removal of Littlerock Reservoir. This Project was evaluated as a separate project and the EIR was adopted by PWD in 2017. An LSA was obtained in 2018 (1600-2018-0077-R5) and in 2022 (LAN-20081-R5) for the individual project.

Palmdale Ditch Improvement Project: Under the proposed Project, PWD would enclose the now- open Palmdale Ditch by constructing one to two miles of pipe within the ditch to reduce evaporation and seepage, as well as increase local water supply.

**Location:** The Project area is located throughout PWD's 47-square mile service area in the Antelope Valley of Los Angeles County. For the Palmdale Ditch Improvement Project, a portion of the Palmdale Ditch component extends south of the PWD service area. Additionally, a portion of the conveyance facilities related to the Upper Amargosa Creek Water Recharge Project extend north of the PWD service area into unincorporated Los Angeles County,

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September 13, 2023  
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## Comments and Recommendations

CDFW offers comments and recommendations below to assist the PWD in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The PEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, §21061; CEQA Guidelines, §§15003(i), 15151]. CDFW looks forward to commenting on the PEIR when it is available.

### Specific Comments:

- 1) Individual Projects. The NOP lists the UAP and Littlerock Reservoir Sediment Removal Project as proposed actions in the PEIR. Both Projects have been previously evaluated under CEQA and have been approved by PWD. Additionally, discretionary permits have already been obtained from CDFW for these Projects. The PEIR should distinguish between Projects, or actions associated with these Projects, which are being analyzed in the PEIR, and actions which have been analyzed previously and will not be further discussed. If there is no further analysis warranted under the PEIR, these Projects should be omitted from the document.
- 2) Groundwater Dependent Ecosystems. CDFW has a vested interest in the sustainable management of groundwater, as many sensitive ecosystems and public trust resources are dependent on groundwater. According to the Department of Water Resources (DWR)'s [Natural Communities Commonly Associated with Groundwater - Vegetation](#) Dataset, groundwater dependent ecosystems (GDEs) occur within and adjacent to the Project area (DWR 2023). Specifically, GDEs have been identified to occur in the southern portion of the Project area, near Lake Palmdale and Littlerock Dam Reservoir. Additionally, the Little Rock Wash, immediately east of the Project area supports GDEs. Phreatophytic vegetation associated with GDEs is a critical contributor to nesting and foraging habitat for a wide range of species and can be affected by depth to groundwater (Naumburg et al. 2005, Froend and Sommer 2010). Actions under the proposed Project could result in significant adverse impacts for phreatophytic vegetation due to their sensitivity to groundwater level thresholds. Fluctuations in groundwater elevation has the potential to stress phreatophytes depending on the plant species and the groundwater elevation and duration (e.g., short-term wetness/dryness versus prolonged wetness/dryness).

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Palmdale Water District  
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The PEIR should verify the existence of GDEs that could be affected by the Project and identify vegetation communities (e.g., species compositions, structural diversity, and integrity) and associated rooting depths/optimal groundwater table elevations. Upon confirmation of GDEs, PWD should: 1) determine which proposed phase or alternative is most likely to impact GDEs based on basin hydrology; 2) deploy representative groundwater monitoring stations within GDEs to track groundwater levels and vegetation responses over time; and 3) establish thresholds/triggers for adaptive management to respond to stressed vegetation as needed. If the proposed Project is expected to result in habitat benefits to GDEs, monitoring should be utilized to track and confirm positive and negative outcomes. Moreover, the PEIR should also discuss and analyze how each proposed action would impact GDEs.

- 3) Groundwater Impact Analysis. The Project proposes to maximize recycled and imported water recharge into the Antelope Valley Groundwater Basin via groundwater injection. Additionally, seven new wells will be developed and equipped for groundwater extraction activities. Increased groundwater extraction during dry water years can lower groundwater tables to a level that may induce increased stress on groundwater-dependent biological resources. Conversely, groundwater recharged with treated water may also raise local groundwater table elevations. As increased recharge raises the groundwater table, biological resources may be significantly impacted due to fully saturated soil zones. Groundwater activities such as pumping, treating, extracting, and recharging within a short period of time may contribute to possible subsidence.

The PEIR should address how groundwater activities (i.e., pumping, treatment, extracting, and recharging) would impact biological resources. The PEIR should disclose groundwater recharge and extraction thresholds and how PWD will ensure groundwater activities do not exceed these thresholds. Effective/reliable methods to monitor and manage groundwater activities should be outlined within the PEIR.

- 4) Stream Delineation and Impact Assessment. The proposed Project intends to install and maintain new conveyance pipelines and construct new wells for groundwater injection activities. Additionally, the Palmdale Ditch Improvement Project facilitated by the proposed Project will enclose portions of a 7.2-mile open ditch. These Project activities may impact streams water courses within and/or adjacent to the Project area.

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- a) Analysis and Disclosure. In preparation of the PEIR, CDFW recommends the PEIR include a stream delineation and evaluation of impacts on any river or stream. The delineation should be conducted pursuant to the United States Fish and Wildlife Service (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1979). A discussion of impacts to these resources should be discussed in the PEIR and, may include channelizing or diverting streams, impairing a watercourse, and removing or degrading vegetation through habitat modification (e.g., loss of water source, loss of substrate, encroachment, and edge effects leading to introduction of non-native plants).
- b) Avoidance and Setbacks. CDFW recommends the Project avoid impacts on streams and associated natural communities. Herbaceous vegetation adjacent to streams protects the physical and ecological integrity of these water features and maintains the natural sedimentation process. The Project should be designed within effective setbacks from streams and associated natural communities. If the Project would occur near streams, but would avoid impacts on streams, the PEIR should provide a justification as to why a proposed setback distance would be effective to avoid impacts on the stream and associated vegetation.
- c) Mitigation. If avoidance is not feasible, the PEIR should include measures to fully compensate for impacts on streams and loss of associated natural communities. Higher mitigation should be provided to compensate for impacts on streams supporting rare, sensitive, or special status fish, wildlife, and natural communities.
- d) Fish and Game Code Section 1602. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. 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 notify CDFW. Accordingly, if the Project would impact streams, the PEIR should include measures to notify CDFW pursuant to Fish and Game Code section 1602 prior to starting activities that may impact streams. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2023a).

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- 5) Mohave Ground Squirrel (*Xerospermophilus mohavensis*). Mohave ground squirrels have been documented historically within the Antelope Valley region. According to the [California Natural Diversity Database](#) (CNDDDB), there are several recorded observations of Mohave ground squirrel within the Project area (CDFW 2023b). Habitat supporting Mohave ground squirrel may be impacted through development of new wells and installment of conveyance pipelines.
- a) Protection Status. Mohave ground squirrel is designated as a threatened species under CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. Take of any endangered, threatened, candidate species that results from the Project is prohibited, except as authorized by State law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).
- b) Disclosure and Surveys. CDFW recommends the PEIR provide a discussion of habitat suitability for Mohave ground squirrel within the Project area. Potential direct and indirect impacts on Mohave ground squirrel should be discussed in the PEIR. For areas within the Project area that support Mohave ground squirrel, CDFW recommends PWD retain a qualified biologist to conduct a focused survey during the appropriate period and adhering to CDFW's [Mohave Ground Squirrel Survey Guidelines](#) (CDFW 2010). Findings from the focused survey should be included in the PEIR for complete public disclosure and review.
- c) Mitigation. If the Project would impact Mohave ground squirrel, the PEIR should provide measures to avoid, minimize, and/or mitigate potential impacts to Mohave ground squirrel as well as habitat supporting the species. For unavoidable impacts, appropriate mitigation may include consultation with CDFW and obtaining appropriate take authorization under CESA.
- d) CESA ITP. An appropriate take authorization from CDFW under CESA 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 the project and mitigation measures may be required to obtain an ITP. 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 for the Project unless the Project's CEQA document addresses all the Project's impact on CESA endangered,

Adam Ly  
Palmdale Water District  
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threatened, and/or candidate species. The Project's CEQA document should also specify a mitigation monitoring and reporting program that will meet the requirements of an ITP. It is important that the take proposed to be authorized by CDFW's ITP be described in detail in the Project's CEQA document. Also, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP. However, it is worth noting that mitigation for the Project's impact on a CESA endangered, threatened, and/or candidate species proposed in the Project's CEQA document may not necessarily satisfy mitigation required to obtain an ITP. Please visit CDFW's [California Endangered Species Act \(CESA\) Permits](#) webpage for more information (CDFW 2023c).

- 6) Crotch's bumble bee (*Bombus crotchii*). The Project area may support habitat (e.g., grasslands and scrub) and provide floral resources for Crotch's bumble bee. A search of CNDDDB indicates a historical observation of Crotch's bumble bee within the Project area. If Crotch's bumble bee is present, construction activities required to implement the Project may grade and/or develop habitat supporting Crotch's bumble bee. The Project may result in temporal or permanent loss of suitable nesting and foraging habitat. In addition, Project ground-disturbing activities may cause death or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success.
  - a) Protection Status. The California Fish and Game Commission accepted a petition to list the Crotch bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. Crotch bumble bee is granted full protection as a threatened species under CESA. In addition, Crotch bumble bee has a State ranking of S1/S2. This means that the Crotch bumble bee is considered critically imperiled or imperiled and is extremely rare (often five or fewer populations). Crotch bumble bee is also listed as an invertebrate of conservation priority under the [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017).
  - b) Disclosure and Surveys. The PEIR should provide full disclosure of the presence of Crotch's bumble bee within the Project area. The PEIR should analyze the Project's impact on floral resources, nesting habitat, and overwintering habitat for Crotch's bumble bee. Conclusions made in regard to habitat quality and suitability should be substantiated by scientific and factual data, which may include maps, diagrams, and similar relevant information sufficient to permit full assessment of significant

Adam Ly  
Palmdale Water District  
September 13, 2023  
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impacts by reviewing agencies. Potential direct and indirect impacts on Crotch's bumble bee should be discussed in the PEIR. Additionally, CDFW recommends PWD to retain a qualified entomologist familiar with the species to survey Project area for Crotch's bumble bee and suitable habitat. Surveys for Crotch's bumble bee should adhere to the [Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#) (CDFW 2023d).

- c) Mitigation. The PEIR should include measures to first avoid impacts on If Crotch's bumble bee is present, a qualified entomologist should identify the location of all nests in or adjacent to the Project area. If nests are identified, 15-meter no-disturbance buffer zones should be established around nests to reduce the risk of disturbance or accidental take. If the Project cannot avoid impacts, PWD should consult CDFW to determine if an ITP is required. In addition, PWD should provide compensatory mitigation for removal or damage to any floral resource associated with Crotch's bumble bee. Floral resources should be replaced as close to their original location as is feasible.
- 7) Arroyo Toad (*Anaxyrus californicus*). According to the [USFWS Critical Habitat Threatened and Endangered Species](#) Dataset, critical habitat for arroyo toad is located south of Littlerock Reservoir (USFWS 2023). Activities proposed by the Project near and within Littlerock Reservoir may impact arroyo toad through direct mortality and/or injury as well as removal or habitat modification of critical habitat.
- a) Protection Status. Consistent with CEQA Guidelines, Section 15380, the status of the Arroyo toad as an endangered species pursuant to the federal Endangered Species Act (16 U.S.C. § 1531 *et seq.*) qualifies it as an endangered, rare, or threatened species under CEQA.
- b) Disclosure and Surveys. The PEIR should disclose areas within and adjacent to the Project area that may support arroyo toad. Potential direct and indirect impacts on arroyo toad should be analyzed and discussed in the PEIR. For areas within the Project area that support arroyo toad, CDFW recommends PWD retain a qualified biologist to conduct a focused survey in accordance with USFWS's [Survey Protocol For the Arroyo Toad](#) (USFWS 1999). Findings from the focused survey should be included in the PEIR for complete public disclosure and review.

Adam Ly  
Palmdale Water District  
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- c) Mitigation. If the Project would impact arroyo toad, the PEIR should provide measures to avoid, minimize, and/or mitigate potential impacts to arroyo toad as well as habitat supporting the species. If impacts are unavoidable, PWD should consult with USFWS, in order to comply with ESA, well in advance of any ground-disturbing activities and/or vegetation removal that may impact federally listed species.
- 8) Burrowing Owl (*Athene cunicularia*). According to CNDDDB, there are observations from 2006 of burrowing owls within the Project area. Project activities may result in removal of supporting habitat. Additionally, elevated levels of noise, human activity, ground vibrations may flush burrowing owls out of potential wintering or breeding sites, thus resulting in nest abandonment and/or reduced reproductive capacity.
- a) Protection Status. Burrowing owls are designated as a Species of Special Concern (SSC). Although burrowing owls are not a CESA-listed species, CEQA provides protection for any species including but not limited to SSC, which can be shown to meet the criteria for State listing. Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).
- b) Disclosure. The PEIR should provide full disclosure of the presence or absence of burrowing owls within the Project area, so CDFW may assist PWD in identifying and mitigating potential impacts on burrowing owls. Adequate disclosure is recommended so CDFW may review data pertaining to burrowing owls and provide comments and recommendations specific to the Project's potential alternatives, mitigation measures, and any potential significant effects. An impact assessment for burrowing owls should evaluate impacts resulting from Project construction and activities as well as habitat loss.
- c) Surveys. CDFW recommends PWD retain a qualified biologist to conduct a focused survey for burrowing owls prior to the preparation of the Project's environmental document. A qualified biologist should survey for burrowing owls adhering to survey methods described in CDFW's March 7, 2012, [Staff Report on Burrowing Owl Mitigation](#) (CDFW 2012). A focused burrowing owl survey should be conducted no more than one year from the date of the Project's environmental document. The survey area should include the Project site and 150 meters from the Project site where suitable habitat is present. All survey efforts should be conducted by a qualified biologist. Survey protocol for breeding season owl surveys states to conduct four



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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. Findings from the focused surveys should be included in the PEIR for complete public disclosure and review.

- d) Mitigation. If presence of burrowing owls within the Project area is confirmed, the PEIR provide measures to avoid, minimize, and mitigate potential impacts on burrowing owls. CDFW recommends mitigation methods described in the Staff Report on Burrowing Owl Mitigation. Inadequate avoidance and mitigation measures will result in the Project having substantial adverse direct and cumulative effect, either directly or through habitat modifications, on an SSC.
- 9) Species of Special Concern – Reptiles. A search of CNDDDB indicated northern California legless lizard (*Anniella pulchra*), California glossy snake (*Arizona elegans occidentalis*), and coast horned lizard (*Phrynosoma blainvillii*) may be present within and adjacent to the Project area.
- a) Protection Status. All of the reptile species listed above are designated as a SSC. CDFW considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures [CEQA Guidelines, §§ 15064, 15065, 15125(c), and 15380].
- b) Disclosure and Surveys. CDFW recommends the PEIR fully disclose potential species-specific impacts and provide measures to fully avoid impacts to wildlife and habitat during the construction and operational phase of the Project. Additionally, species, season, and time of day field surveys should be conducted in preparation of the PEIR. Survey protocols and guidelines for select special status plants and wildlife may be found on CDFW's [Survey and Monitoring Protocols and Guidelines](#) webpage (CDFW 2023e). Surveys should not deviate from established protocols and guidelines except with documented approval specific to this Project. Findings from the focused surveys should be disclosed in the PEIR and appropriate avoidance, minimization and/or mitigation measures should be proposed.
- 10) Nesting Birds and Raptors. The Project area provides potential nesting habitat for nesting birds and raptors. The proposed Project may impact nesting birds through construction activities, installation activities, elevated-related noise,

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and vegetation removal. Furthermore, Project activities occurring during the nesting bird season, especially in areas providing suitable nesting habitat, could result in the incidental loss of fertile eggs or nestlings, or nest abandonment of special status birds, including least bell's vireo (*Vireo bellii pusillus*) and Swainson's hawk (*Buteo swainsoni*).

- a) Protection Status. 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) Disclosure and Analysis. The PEIR should discuss the Project's potential impact on nesting birds and raptors within the Project area. A discussion of potential impacts should include impacts that may occur during ground-disturbing activities and vegetation removal. The PEIR should analyze and discuss the Project's impact on bird and raptor nesting and breeding habitat.
- c) Avoidance. CDFW recommends the PEIR include a measure to fully avoid impacts to nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g., mobilizing, staging, and excavating), and vegetation removal during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
- d) Minimizing Potential Impacts. If impacts to nesting birds and raptors cannot be avoided, CDFW recommends the PEIR include measures to minimize impacts on nesting birds and raptors. Prior to starting ground-disturbing activities and vegetation removal, a qualified biologist should conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW recommends a minimum 300-foot no disturbance buffer around active bird nests. For raptors, the no disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Personnel working on the Project, including all contractors working on site, should be instructed on the presence of nesting birds, area sensitivity, and adherence to no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species

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involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.

11) Significant Ecological Area (SEA). Portions of the Project area is located within and adjacent to Significant Ecological Areas (SEA). Lake Palmdale and its surrounding area is located in the San Andreas SEA. Additionally, the Antelope Valley SEA is just east of the Project area. [Los Angeles County Significant Ecological Areas](#) are officially designated areas within Los Angeles County identified as having irreplaceable biological resources (LACDRP 2023). These areas represent the wide-ranging biodiversity of Los Angeles County and contain some of Los Angeles County's most important biological resources. The PEIR should discuss the Project's impact on the San Andreas and Antelope Valley SEA. If the Project will impact areas where the SEA Ordinance applies, the PEIR also provide measures that are concurrent to the SEA Ordinance.

## **General Comments**

1. Biological Baseline Assessment. The CEQA document should provide an adequate biological resources assessment, including a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site. CDFW also considers impacts to SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. An environmental document should include the following information:
  - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The CEQA 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, and S3 should be considered sensitive and

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declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2023f);

- 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 Online](#) should also be used to inform this mapping and assessment (CNPS 2023). Adjoining habitat areas should be included in this assessment if the Project 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. California Natural Diversity Database in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. 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 on 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

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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. Acceptable species-specific survey procedures may be developed in consultation with CDFW and the USFWS; and,

- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a 1-year period, and assessments for rare plants may be considered valid for a period of up to 3 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.
2. Scientific Collecting Permit. A scientific collecting permit will be necessary for many of the species' surveys outlined above. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#) webpage for information (CDFW 2023g).
  3. Disclosure. The CEQA document should provide an adequate, complete, and detailed disclosure about the effect which a proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, §15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
  4. 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

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[CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document “shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.”

- a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency “shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures” (Pub. Resources Code, § 21081.6). CDFW recommends PWD provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Adequate disclosure is necessary so CDFW may provide comments on the adequacy and feasibility of proposed mitigation measures.
  - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the Project as proposed, the CEQA document should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the CEQA document should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
5. 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 2023h). To submit information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Relevé Form](#) should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2023i). PWD should ensure data collected for the preparation of the CEQA document be properly submitted, with all data fields applicable filled out. The data entry should also list pending development as a threat and

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then update this occurrence after impacts have occurred.

6. 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 CEQA document should address the following:
  - a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the CEQA document;
  - b) A discussion of both the short-term and long-term effects to species population distribution and concentration and alterations of the ecosystem supporting the species impacted [CEQA Guidelines, § 15126.2(a)];
  - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
  - d) A discussion of Project-related changes on drainage patterns; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site. The discussion should also address the potential water extraction activities and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
  - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the CEQA document; and,

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- 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 PWD determines that the Project would not have a cumulative impact, the CEQA document should indicate why the cumulative impact is not significant. PWD's conclusion should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
7. Compensatory Mitigation. The CEQA 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.
8. Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, a CEQA 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**

We appreciate the opportunity to comment on the NOP for the 2023 Strategic Water Resources Plan Update to assist PWD in identifying and mitigating Project



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impacts on biological resources. If you have any questions or comments regarding this letter, please contact Julisa Portugal, Environmental Scientist, at [Julisa.Portugal@wildlife.ca.gov](mailto:Julisa.Portugal@wildlife.ca.gov) or (562) 330-7563.

Sincerely,

DocuSigned by:  
*Jennifer Turner*  
C3D449ECB7C14DE...

Jennifer Turner signing for

David Mayer  
Environmental Program Manager  
South Coast Region

ec: CDFW  
Jennifer Turner, San Diego – [Jennifer.Turner@wildlife.ca.gov](mailto:Jennifer.Turner@wildlife.ca.gov)  
Felicia Silva, Seal Beach – [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov)  
Cindy Hailey, San Diego – [Cindy.Hailey@wildlife.ca.gov](mailto:Cindy.Hailey@wildlife.ca.gov)  
CEQA Program Coordinator, Sacramento

OPR  
State Clearinghouse – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

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September 15, 2023

Ref. DOC 6998694

VIA EMAIL [aly@palmdalewater.org](mailto:aly@palmdalewater.org)

Mr. Adam C. Ly, Assistant General Manager  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, CA 93550

Dear Mr. Ly:

**Comments on the Notice of Preparation of the Draft Environmental Impact Report  
for the 2023 Strategic Water Resources Plan Update**

The Los Angeles County Sanitation Districts (Sanitation Districts) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the subject plan update on August 14, 2023. Most of Palmdale Water District's service area is located within the jurisdictional boundaries of County Sanitation District No. 20 (District No. 20). We offer the following comments:

**For the Proposed Groundwater Injection Wells and Conveyance Pipelines**

1. District No. 20 owns and maintains sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Sanitation Districts' sewer easement and/or over or near a Sanitation Districts' sewer is required before construction may begin. To obtain copies of as-built drawings of District No. 20's facilities within the project limits, please contact the Sanitation Districts' Engineering Counter at [engineeringcounter@lacsd.org](mailto:engineeringcounter@lacsd.org) or (562) 908-4288, extension 1205. If any of the proposed improvements for this project will be located over or near a Sanitation Districts' sewer easement, "Buildover" review and approval by the Sanitation Districts will be required. For a copy of the Sanitation Districts' Buildover procedures and requirements, go to [www.lacsd.org](http://www.lacsd.org), under Services, then Wastewater Program and Permits and select Buildover Procedures. For more specific information regarding the buildover procedure, please contact Mr. Ryan Honda at (562) 908-4288, extension 2766.
2. The Sanitation Districts cannot issue a detailed response to or permit construction of the proposed project until detailed project plans and specification that incorporate District No. 20's facilities are submitted for our review. When project plans that incorporate our facilities have been prepared, please submit copies to the Engineering Counter for our review and comment.

**For the Proposed Pure Water Antelope Valley Advanced Water Treatment Plant**

3. The Sanitation Districts, with a mission to protect public health and the environment and, in doing so, convert waste into resources such as recycled water, energy, and recycled materials, is in support of the proposed Advanced Water Treatment Plant (AWTP). The Sanitation Districts has a long history of providing affordable, high-quality recycled water to public and private water suppliers to help meet the water supply needs for more than a hundred thousand people within District No. 20's service area. Wastewater generated by the proposed project will be treated at the Palmdale Water Reclamation Plant,

which has a capacity to treat 12 million gallons per day (MGD) of wastewater and currently processes an average recycled flow of 8.2 MGD.

4. The proposed AWTP may require an Industrial Wastewater (IW) Discharge permit from the Sanitation Districts in order to discharge brine or any other wastewater into District No. 20's sewerage system. Please contact the Sanitation Districts' IW Section at (562) 908-4288, extension 2900, to determine if an IW Permit is necessary. If this permit is necessary, Palmdale Water District will be required to obtain the IW Permit before beginning project construction. Additional information for which can be found on our website at [Industrial Wastewater Discharge Permits](#).
5. The proposed AWTP may require a Trunk Sewer Connection Permit from the Sanitation Districts if the proposed brine/wastewater discharge pipeline from the AWTP will connect directly to a District No. 20's trunk sewer. The Sanitation Districts will determine if such a permit is necessary during review of the detailed project plans that Palmdale Water District will prepare and submit to the Sanitation Districts' Engineering Counter for review, as indicated in Comment #1 above.
6. In order to estimate the volume of wastewater the project will generate, go to [www.lacsd.org](http://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 Sanitation Districts' average wastewater generation factors.

#### General Comments

7. Please revise all references in the NOP from "Palmdale Water Reclamation Facility" to "Palmdale Water Reclamation Plant". Additionally, at the bottom of page 2, where the first reference is made to this facility, please revise the language as follows "...within the vicinity of the Palmdale Water Reclamation Plant (WRP) (see Figure 3), which is owned and operated by County Sanitation District No. 20."
8. Please revise all references in Exhibits 2 and 3 from "Palmdale WRF" to "Palmdale WRP".
9. The Sanitation Districts are empowered by the California Health and Safety Code to charge a fee to connect facilities (directly or indirectly) to the Sanitation Districts' Sewerage System or to increase the strength or quantity of wastewater discharged from connected facilities. This connection fee is used by the Sanitation Districts for its capital facilities. Payment of a connection fee may be required before this project is permitted to discharge to the Sanitation Districts' Sewerage System. For more information and a copy of the Connection Fee Information Sheet, go to [www.lacsd.org](http://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 Sanitation 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, please contact the Sanitation 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.
10. In order for the Sanitation Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Sanitation 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 Sanitation 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 Sanitation 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 Palmdale Water District that District No. 20 intends to provide this service up to the levels that are legally permitted and to inform the Palmdale Water District of the currently existing capacity and any proposed expansion of District No. 20's facilities.

If you have any questions, please contact Ms. Mandy Huffman at (562) 908-4288, extension 2743, or [mandyhuffman@lacsdsd.org](mailto:mandyhuffman@lacsdsd.org).

Very truly yours,



Ziad El Jack  
Supervising Engineer  
Facilities Planning Department

MNH:mnh

cc: Engineering Counter  
R. Honda  
P. Palencia  
R. Paracuelles



# OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



September 15, 2023

Mr. Adam C. Ly  
Assistant General Manager  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, California 93550

Dear Mr. Ly:

**PALMDALE WATER DISTRICT PROJECT  
NOTICE OF PREPARATION  
REVIEW COMMENTS**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the Notice of Preparation for the 2023 Strategic Water Resources Plan Update Environmental Impact Report (Plan Update). The Plan Update contemplates Palmdale Water District's 47-square mile service area in the Antelope Valley area of Los Angeles County and addresses anticipated water demands due to customer growth through 2050.

The Project is located within the service area of the Department's Palmdale Sheriff's Station (Station). Since the environmental document will be a Program EIR, and may contain conceptual and general information, the Department will provide more detailed comments once each project is contemplated.

However, the Program EIR should address, but not limited to impacts related to traffic, phasing, and concurrent work if any, construction activities that would prevent emergency access, truck trips and routes related to sediment removal and disruption of water service.

The Department has no other comment to submit at this time but reserves the right to further address this matter in subsequent reviews of the Plan Update.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

*A Tradition of Service*  
— Since 1850 —

Mr. Ly

-2-

September 15, 2023

Also, for future reference, the Department provides the following updated address and contact information for all requests for reviews comments, law documents, and other related correspondence:

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

Attention: Planning Section

Should you have any questions regarding this matter, please contact me, at (323) 526-5657, or your staff may contact Ms. Bee Bee Pee, of my staff, at (323) 526-5697.

Sincerely,

ROBERT G. LUNA, SHERIFF



Tracey Jue, Director  
Facilities Planning Bureau





MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

September 18, 2023

IN REPLY PLEASE

REFER TO FILE:

**LD-4**

Mr. Adam Ly  
Assistant General Manager  
Palmdale Water District  
2029 East Avenue Q  
Palmdale, CA 93550

Dear Mr. Ly:

**ENVIRONMENTAL PLAN (RPPL2023004598)  
PALMDALE WATER DISTRICT  
2023 STRATEGIC WATER RESOURCES PLAN UPDATE  
NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT**

As requested, Public Works reviewed the Notice of Preparation (NOP)/Draft Environmental Impact Report (DEIR) for the proposed project. The 2023 Strategic Water Resources Plan Update (23PU) ensures a sound water supply strategy to meet Palmdale Water District (PWD) customer demands through 2050.

We offer the following comments for your consideration, some of which may fall under the purview of the Antelope Valley Watermaster and the Lahontan Regional Water Quality Control Board:

**1. Groundwater Quality and Levels in the Antelope Valley Groundwater Basin**

The 23PU focuses on groundwater extraction to provide service. The DEIR should elaborate on measures ensuring the sustainability of the Antelope Valley Basin. Additional details would bolster stakeholder confidence and highlight the ongoing basin adjudication efforts.

Regarding wastewater treatment, is PWD exploring an approach similar to the Orange County Water District's three-step advanced purification before groundwater injection? Understanding similarities and differences between these initiatives would be helpful.

**2. Monitoring Injected Recycled Water**

The DEIR should elaborate on the provisions made to monitor and mitigate any potential contamination between the injected recycled water and any adjacent groundwater wells. The mitigations would emphasize the proactive approach PWD is taking in ensuring the future quality of the groundwater extracted.

**3. Resource Allocation during Droughts**

Considering the unpredictable nature of water supply and potential challenges during periods of drought or reduced imported water, the DEIR should include discussion on how PWD plans to manage limited shared water resources. Sharing this information would reassure neighboring agencies and communities about preparedness and coordination. This, of course, would be in addition to other efforts made by the Antelope Valley Watermaster to help track and coordinate the region's water supplies.

**4. Impact on Neighboring Water Utilities**

Given that the PWD's plans include the introduction of new and rehabilitated wells, and increased groundwater extraction, the DEIR should expand analysis on the potential impact on the quality and quantity of water available around these wells for neighboring water utilities.

**5. Littlerock Reservoir and Palmdale Ditch Improvement Projects**

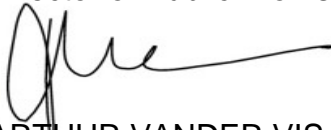
As these projects play a crucial role in influencing water flow or quality in surrounding areas, the DEIR should discuss the anticipated impact and mitigation for downstream and in adjacent regions.

For questions regarding the above comments, please contact Mr. Daniel Bradbury of Public Works, Waterworks Division, at (626) 300-3334 or [dbradbury@pw.lacounty.gov](mailto:dbradbury@pw.lacounty.gov).

We request that all future environmental documents be sent to Ms. Aracely Lasso of Public Works, Land Development Division, at [alasso@pw.lacounty.gov](mailto:alasso@pw.lacounty.gov) for review and comment.

Very truly yours,

MARK PESTRELLA, PE  
Director of Public Works

*for* 

ARTHUR VANDER VIS, PE  
Assistant Deputy Director  
Land Development Division

DK:la



**PALMDALE WATER DISTRICT**  
A CENTURY OF SERVICE

2023 Strategic Water Resources Plan Update Environmental Impact Report – Scoping Meeting  
Public Review Period

## COMMENT CARD

Category:  Design  Environmental  General

Name	Gilbert BORQUEZ
Date	9/7/2023
Affiliation/Organization	<del>CITY OF PALMDALE</del> PALMDALE SCHOOL DIST
Contact Information (Mailing/Email Address)	gcborquez@PalmdaleSD.ORG
Comments	<ul style="list-style-type: none"><li>- What are we doing to reduce demand</li><li>- Are we considering above ground storage or underground storage</li><li>- Conservation program.</li></ul>

Submit written comments to:  
2023 Strategic Water Resources Plan Update Environmental Impact Report – Scoping Meeting  
Attention: Mr. Adam Ly, Assistant General Manager  
Palmdale Water District  
2029 East Avenue Q.  
Palmdale, CA 93550

Email: [aly@palmdalewater.org](mailto:aly@palmdalewater.org)