COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service"

DATE: April 4, 2014
FILE NO:

OFFICE CORRESPONDENCE

FROM: ROOSEVELT JOHNSON, CAPTAIN TO: GARY T. K. TSE, DIRECTOR
SANTA CLARITA VALLEY STATION FACILITIES PLANNING BUREAU


The Santa Clarita Valley Station reviewed the Notice of Scoping/Initiation of Studies (NOS/IOS), dated February 28, 2014, for the Northwest SR-138 Corridor Improvement Project (Project). The proposed Project will improve a 36-mile segment of SR-138, from I-5 to SR-14, in the Antelope Valley.

The proposed Project appears to be in the preliminary planning stage. As such, specific information regarding the proposed Project is limited at this time. However, according to general statements contained in the NOS/IOS and the January 2014 Overview Fact Sheet prepared by the State Department of Transportation (Caltrans), the proposed Project is intended to accommodate anticipated population/economic growth in the Antelope Valley by increasing roadway sight distances, upgrading various roadway features to meet current roadway standards, improving connections to properties along the corridor, and improving emergency access throughout.

Based on such generalized information available at this time, the Santa Clarita Valley Station has no palpable concern and is generally supportive of the proposed Project. However, the Santa Clarita Valley Station reserves the right to revise our assessment of the proposed Project as subsequent environmental documents are available for review and comment, and/or the following detailed information is determined by Caltrans:
SR-138 CORRIDOR IMPROVEMENT -2- April 4, 2014

- Ultimate type of facility (freeway and/or expressway);
- Right-of-way requirements;
- Guidelines for improvements;
- Requirements for technical studies; and,
- Identification of potential post-Project roadway improvements.

Lastly, be advised the proposed Project is partially located within the service area of Lancaster Station (LAN). As such, LAN should be afforded the opportunity to review and comment on the proposed Project.

Thank you for including the Santa Clarita Valley Station in the environmental review process for the proposed Project. Should you have any questions regarding this matter, please contact Operations Lieutenant Robert Lewis at (661) 799-5102.

RJ:RL:rl
April 10, 2014

Ron Kosinski, Deputy District Director
California Department of Transportation
Division of Environmental Planning
(NW SR-138)
100 South Main St
Los Angeles, CA 90012
Attn: Tami Podesta

Northwest 138 Corridor Improvement Project

Dear Ms. Podesta,

This letter is in reference to the planned Northwest 138 Corridor Improvement Project. The project is situated in the northwest corner of Los Angeles County, just south of the Kern County Boarder. The proposed project crosses the Department of Water Resources (DWR) California Aqueduct in various locations, as well as bordering Quail Lake, both part of the State Water Project. Based on information obtained at your March 18th Scoping meeting in Lancaster, it is apparent that multiple crossings of the California Aqueduct and various aspects of DWR right of way will be impacted by segments of your project.

Please be aware that any improvements that alter the California Aqueduct or its associated facilities will require an encroachment permit, or other form of agreement with DWR prior to the beginning of construction. In addition to potential impacts to DWR facilities, it should be noted that there are multiple drainage features that may be impacted by your project. Therefore, any alteration to existing drainage patterns that would have an effect on DWR right of way will have to be addressed in your study.

Please provide DWR with a copy of any subsequent documentation as it becomes available for public review. Any future correspondence relating to this project should be sent to:

Leroy Ellinghouse, Chief
SWP Encroachment Section
Division of Operations and 0020 Maintenance
Department of Water Resources
1416 Ninth Street, Room 641-1
Sacramento, California 95814

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If you have any questions, please contact me at (916) 653-7168.

Sincerely,

Leroy Ellinghouse, Chief
SWP Encroachment Section
Division of Operations and Maintenance
April 18, 2014

Mr. Ron Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation
Northwest 138 Corridor Improvement Project
100 South Main Street (Mail Stop 16A)
Los Angeles, CA 90012

Dear Mr. Kosinski:

The California High-Speed Rail Authority (Authority) thanks the California Department of Transportation (Caltrans) and the Los Angeles County Metropolitan Transportation Authority (Metro) for the opportunity to submit scoping comments on the Northwest 138 Corridor Improvement Project. The Authority has been coordinating with Caltrans and Metro on a number of projects in the Antelope Valley, and appreciates the efforts of both agencies to make safety and mobility improvements to the Northwest 138 Corridor.

The Northwest 138 Corridor is a key linkage between Interstate 5 and State Route 14 in the Antelope Valley, providing important connectivity and access across the region. The Authority encourages Caltrans and Metro to pursue a range of alternatives that gives residents and stakeholders a variety of options and benefits to consider. The Authority has been working for many years to plan a high-speed rail station in Palmdale, and appreciates the potential for additional access to the planned station that an improved Northwest 138 Corridor could provide. The Authority encourages both agencies to consider current high-speed rail planning documents for the Bakersfield to Palmdale and Palmdale to Los Angeles project sections in their work. Details about both project sections are available at http://www.bsr.ca.gov/Programs/Statewide_Rail_Modernization/Project_Sections/index.html.
Mr. Ron Kosinski
Page 2

The Authority looks forward to continuing to work with Caltrans and Metro in the Antelope Valley as alternatives develop for the Northwest 138 Corridor and high-speed rail planning continues to advance. Authority staff stands ready to further coordinate with Caltrans and Metro staffs as additional project details are developed. Please contact me at mark.mcloughlin@hsr.ca.gov or (916) 324-1541 with any questions.

Sincerely,

Mark A. McLoughlin
Director of Environmental Services

Michelle Boehm
Southern California Regional Director

cc: Jeff Morales, Chief Executive Officer, California High-Speed Rail Authority
   Teresa Wong, Project Manager, Los Angeles County Metropolitan Transportation Authority
APPENDIX H- COORDINATION AND AGENCY MEETING SUMMARY

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

April 21, 2014
Ref File No.: 2903466

Mr. Ronald J. Kosinski,
Deputy District Director
Division of Environmental Planning
California Department of Transportation
District 7
100 South Main Street – Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Northwest 138 Corridor Improvement Project

This is in reply to your notice, which was received by the County Sanitation Districts of Los Angeles County (Districts) on February 26, 2014. We offer the following comments:

- The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specification that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Mr. Jon Ganz of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

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

Very truly yours,

Grace Robinson Hyde

Adriana Razn
Customer Service Specialist
Facilities Planning Department

AR:ar
cc: J. Ganz

DOC: 2903466.D09

Recycled Paper

Appendix H- 118
April 28, 2014

Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, California 90012

Dear Mr. Kosinski:

REVIEW COMMENTS
NOTICE OF SCOPING/INITIATION OF STUDIES
NORTHWEST SR-138 CORRIDOR IMPROVEMENT PROJECT
(FILE 07-LA-138)

Thank you for inviting the Los Angeles County Sheriff’s Department (Department) to review and comment on the Notice of Scoping/Initiation of Studies (NOS/IOS), dated February 28, 2014, for the Northwest State Route 138 Corridor Improvement Project (Project). The proposed Project will improve a 38-mile segment of State Route 138 (SR-138) from Interstate 5 to State Route 14 in the Antelope Valley.

The NOS/IOS was reviewed by the Department’s Santa Clarita Valley Station (Station). The Station’s review comments are attached hereto (see correspondence from Captain Roosevelt Johnson, dated April 4, 2014).

In summary, the Department is generally supportive of the proposed Project as described in the NOS/IOS, because it is expected to enhance patrol and emergency operations. However, the Department’s assessment is subject to change as more Project-related information becomes available for review and comment.

Should you have any questions regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Project No. E14-015. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyoshi@lasd.org.

A Tradition of Service Since 1850
Mr. Kosinski

-2-

April 28, 2014

Sincerely,

JOHN L. SCOTT, SHERIFF

Gary T.K. Tse, Director
Facilities Planning Bureau
Mr. Kosinski

GKT:LM:lm/jh

Attachments

c: Roosevelt Johnson, Captain, Santa Clarita Valley (SCV) Station
David Culver, Assistant Director, Facilities Planning Bureau (FPB)
Robert Lewis, Operations Lieutenant, SCV Station
Lance Jordan, Deputy, LAN Station
Meghan Wang, Principal Facilities Project Manager, FPB
Lester Miyoshi, Departmental Facilities Planner, FPB
Chrono
(EIR-Northwest SR-138 Corridor)

April 28, 2014
May 5, 2014
Ref File No.: 2903466

Mr. Ronald J. Kosinski
Division of Environmental Planning
California Department of Transportation
District 7
100 South Main Street – Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Northwest State Route 138 Corridor Improvement Project

The County Sanitation Districts of Los Angeles County (Districts) received and provided comments to a Notice of Scoping for the subject project on April 21, 2014. Upon further review of potential impacts the subject project may impose, please take the following under consideration:

- The Lancaster Water Reclamation Plant (LWRP) is physically located on the northeast corner of State Route 14 and State Route 138 interchange (the east end of the subject project). Because the entryway for personnel and chemical deliveries into the LWRP is the main gate, located at 1865 West Avenue, the Districts will require truck access during construction, Monday through Sunday, 6:00 a.m.–4:30 p.m.

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

Very truly yours,
Grace Robinson Hyde

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: J. Ganz
    D. Pierce
APPENDIX I - SHPO Eligibility Determination Letter
February 26, 2016

Kelly Ewing-Toledo
Heritage Resource Coordinator
Department of Transportation
District 7, Division of Environmental Planning
100 South Main Street, Suite 100
Los Angeles, CA 90012-3606

Re: Review of the Determination of Eligibility for the SR-138 Northwest Corridor Improvement Project, Los Angeles County, California

Dear Ms. Ewing-Toledo:

Thank you for your December 28, 2015 letter in which the California Department of Transportation (Caltrans) is initiating SHPO consultation on the above referenced undertaking in accordance with the January 2014 First Amended Programmatic Agreement (PA) among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Office, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California. In accordance with Stipulation VIII.C.6 of the PA, Caltrans is requesting SHPO concurrence on their determinations of eligibility. The following supporting documentation was submitted with your letter:

- Volume 1 and 2: Historic Property Survey Report (HPSR)

The SR-138 Northwest Corridor Improvement Project is being undertaken by the Los Angeles County Metropolitan Transportation Authority and Caltrans, District 7. The project involves improving and widening a 36.35 mile segment of SR-138 between I-5 and SR-14 in the Antelope Valley of northern Los Angeles County. The existing facility is a 2-lane highway and the proposed project would widen the road to a 6-lane freeway with additional operational and safety improvements. Identification efforts for the SR-138 Northwest Corridor Improvement Project are detailed on pages 5 through 7 of the enclosed HPSR. Efforts resulted in the identification of 30 cultural resources within the area of potential effects (APE). In accordance with Stipulation VIII.C of the PA, Caltrans evaluated the 30 cultural resources’ eligibility for listing on the National Register of Historic Places (NRHP) and their evaluations are documented in Attachments J and K of Volume 2.

Previous Determinations of Eligibility

The following three resources within the APE have been previously determined eligible for listing on the NRHP and those determinations are still valid:

<table>
<thead>
<tr>
<th>Address/Location</th>
<th>Community</th>
<th>OHP Status Code/Eligibility Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>P-19-186876-a (Antelope-Valley)</td>
<td>Antelope Valley</td>
<td>2D2 (Previously evaluated,</td>
</tr>
</tbody>
</table>
Ms. Ewing-Toledo
February 26, 2016

<table>
<thead>
<tr>
<th>Magunden #2 Transmission Line</th>
<th>Eligible, Criteria A and C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Big Creek Hydroelectric System East-West Transmission Line</td>
<td>Quail Lake</td>
</tr>
<tr>
<td>P-19-2105 (LA Aqueduct)</td>
<td>Antelope Valley</td>
</tr>
<tr>
<td>2D2 (Previously evaluated, Eligible, Criteria A, B and C)</td>
<td></td>
</tr>
</tbody>
</table>

**Resources Determined Ineligible**

Caltrans evaluated and determined that 26 resources (14 built environment resources, five historic-era archaeological resources, and seven prehistoric archaeological resources) within the APE are not eligible for inclusion in the NRHP. Pursuant to Stipulation VIII.C.6 of the PA, Caltrans is requesting SHPO concurrence with the following NRHP eligibility determinations:

- The following built environment resources are not eligible for the National Register of Historic Places (NRHP):
  - 8320 West Avenue D, Antelope Acres
  - 8622 West Avenue D, Antelope Acres
  - 8656 West Avenue D, Antelope Acres
  - 18140 West Avenue D, Antelope Acres
  - 18348 West Avenue D, Antelope Acres
  - 24825 West Avenue D, Neenach
  - 49155 Tree Points Road
  - Stage Coach Warehouse – approximately 0.5 mile west of intersection of 265th Street W and SR-138 – no address listed, Neenach
  - 28091 West Avenue C6, Neenach
  - 29853 West Avenue C6, Neenach
  - General Petroleum Pumping Station – 33700 West Lancaster Boulevard, Quail Lake Area
  - Old Ridge Route segment #1
  - Old Ridge Route segment #2

Based on my review of the submitted documentation, I concur.

- P-19-4225, a historic-era agricultural archaeological site is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
- P-19-190643/P-19-4414, a historic-era east-west trending highway corridor designated by the state as SR-138 is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
- P-19-004616/CA-LAN-4616/H (SR-023), a historic-era possible homestead site consisting of an historic-era refuse deposit and additional historic-era debris is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
- P-19-004638/CA-LAN-4638H (SR-158), a historic-era occupation site is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
- P-19-004626 (SR-071), a historic-era linear road feature (West Avenue C) with associated historic-era refuse deposits and various modern debris is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
- P-19-004625/CA-LAN-4625H (SR-070), the remains of the WWII-era Victory Field aircraft landing field used by the Polaris Flight Academy during military training operations is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
• CA-LAN-3723 (P-19-003723), a large low density lithic scatter with sparse historic-era material is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
• P-19-004629/CA-LAN-4629 (SR-083), a sparse prehistoric lithic scatter is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
• P-19-004630/CA-LAN-4630 (SR-089), a sparse prehistoric lithic scatter is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
• P-19-004631/CA-LAN-4631 (SR-090), a sparse prehistoric lithic scatter is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
• P-19-004632/CA-LAN-4632 (SR-101), a sparse prehistoric lithic scatter with two distinct activity areas and lithic concentration is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.
• P-19-004633/CA-LAN-4633 (SR-102), a sparse prehistoric lithic scatter is ineligible for listing on the NRHP under Criteria A, B, C, and D. I concur.

Caltrans has evaluated and determined the following prehistoric archaeological sites are ineligible for listing on the NRHP under Criteria A, B, C, and D:

• P-19-004620/CA-LAN-4620 (SR-049), a dense prehistoric lithic scatter that contained 235 artifacts on the surface;
• P-19-004634/CA-LAN-4634 (SR-112), a sparse (14 artifacts recorded on surface) prehistoric lithic scatter.

The SHPO cannot provide meaningful comment on Caltrans’ determination of eligibility of P-19-004620/CA-LAN-4620 (SR-049) and P-19-004634/CA-LAN-4634 (SR-112) because the archaeological field methods employed during this evaluation have completely exhausted the research potential of the surface artifacts from these sites. The evaluation discussion for both of these resources states “all of the visible artifacts on the surface have been collected. Although the surface artifacts have the potential to address several of the research themes, the research potential of the surface artifacts has been exhausted because no material remains on the surface with which to address research questions” (Mason and Blumel 2015: 47, 87). If these resources had been determined eligible for listing on the NRHP under Criterion D, the complete removal of the resources’ surficial data would have been an adverse effect on the resources’ ability to convey their significance. As a result, the SHPO cannot provide meaningful comment on Caltrans’ determination of eligibility of P-19-004620/CA-LAN-4620 (SR-049) and P-19-004634/CA-LAN-4634 (SR-112).

Resources Determined Eligible

Caltrans evaluated and determined that four resources (two build resources and two prehistoric archaeological resources) within the APE are eligible for inclusion in the NRHP. Pursuant to Stipulation VIII.C.6 of the PA, Caltrans is requesting SHPO concurrence on these NRHP eligibility determinations.

Caltrans has determined that the Bell Telephone and Telegraph Switching Station (Switching Station), located at 33700 W Lancaster Boulevard, Tejon Pass/Quail Lake Area is eligible for the NHRP under Criteria A and C at the local level of significance. Under Criterion A the Switching Station is associated with significant developments of communication in the developing regions of Southern California. Under Criterion C Features 1 through 6 on the property are excellent examples of Spanish Revival architecture. The period of significance is 1927-1934. I concur.
The Kinsey Mansion, located at 34860 Lancaster Road, Tejon Pass/Quail Lake Area is also eligible for the NRHP under Criterion C at the local level of significance. The Kinsey Mansion is an excellent example of Neoclassical architecture that developed in the early 20th century. The period of significance is 1946. I concur.

Caltrans has evaluated and determined that P-19-004621/CA-LAN-4621 (SR-051) and P-19-004640/CA-LAN-4640 (SRAS-003) are eligible for listing on the NRHP under Criteria D. The SHPO is unable to concur with Caltrans’ determinations of eligibility because the eligibility discussion fails to demonstrate how the subsurface data answers the research questions and data requirements presented in the established research design. Furthermore, it is unclear why all surface data was collected from both sites and their ability to answer several of the research themes was not addressed in the sites’ overall determination of eligibility. Please note that the National Register Bulletin (NPS) 15 How to Apply the National Register Criteria for Evaluation explains that “a totally collected surface site … is not eligible since the physical remains capable of yielding important information no longer exist at the site” (NPS 23: 1997). That said, a clear argument is not presented that explains how the complete surface removal of these sites has not adversely affected the sites’ overall significance, and how they continue to contain subsurface data capable of addressing several of the research themes.

Resources Assumed Eligible

In accordance with Stipulation VIII.C.4 of the PA, Caltrans is assuming NRHP eligibility of the LADWP Transmission Line for the purposes of this undertaking only.

In accordance with Stipulation XII.B., Caltrans District has sought and gained approval from the DEA/CSO to phase the continued identification and evaluation for the remaining un-surveyed areas within the APE.

General SHPO Comments on Efforts to Identify and Evaluate Historic Properties

Overall, it is unclear as to why the archaeological field methods (Mason and Blumel 2015) employed in the evaluation of all of the resources within the APE included the collection of all surface artifacts from the sites. An evaluation of a resource’s ability or potential ability to yield significant data should of course include an analysis of both surface and subsurface deposits, but archaeological field methods should be employed to collect and excavate an adequate amount of data to evaluate a resource under Criterion D rather than completely removing all of the resource’s data potential. The research design was not used to determine the data potential of the collected surface deposits and the evaluation of these resources solely focused on the subsurface deposits’ data potential.

In correspondence with our office (Kelly Ewing-Toledo, personal communication, February 11, 2016) it was explained that at the time the archaeological sites were tested the ADI boundary had yet to be defined. It was not until later that defined resources, such as LAN-4621 and LAN-4640 were identified as being outside of the ADI. At this time, it remains unclear as to why the resources were tested prior to the ADI being defined. As indicated in the Caltrans Volume 2 Standard Environmental Reference (SER) (2014), the Extended Phase I (XPI) study is an extension of the identification phase that can be implemented to determine whether a portion of a site extends horizontally and/or vertically into the direct APE. The SER goes on to explain that a Phase II study should focus on the portions of the site that would be directly affected by the undertaking (i.e., portions within the direct APE). This will avoid unnecessary disturbances to these areas as a result of the testing effort itself. Even in cases where project limits or direct
effects have not been precisely defined; testing efforts should be weighted heavily towards the portions of the site within the direct APE.

It does not appear that the testing methods employed to identify historic properties focused on portions of the sites that would likely be within the direct APE. Instead, it appears that the complete surface collection and XPI and Phase II testing of all resources within the APE may have unnecessarily disturbed all of the sites within the APE. Upon final delineation of the ADI, it has now been concluded that resources are located outside of the ADI and therefore the complete surface collection and testing of these resources was unnecessary. Please note that Attachment 3 of the PA states that

> While an APE will generally encompass an entire property, physical intrusion such as testing of archaeological sites should be focused on areas subject to reasonably foreseeable effects of the undertaking and must be guided by a project- or site-specific research design. Areas of an archaeological site that are unlikely to be affected by an undertaking should not be tested unless compelling reasons to conduct such testing are provided in the research design.

The archaeological methods should have been developed contingent upon the effects from the undertaking. It appears that the scope of the archaeological field methods have gone well beyond the reasonable “foreseeable effects” of this undertaking.

In an effort to move forward, please provide the SHPO with an explanation as to why archaeological field methods were employed that collected all surface data from all of the resources within the APE and their ability to answer several of the research themes was not addressed in the sites’ overall determination of eligibility. Please also provide an eligibility discussion of CA-LAN-4621 and CA-LAN-4640 that clearly argues how the subsurface data answers the research questions and data requirements presented in the established research design. Please include in this discussion an explanation as to how the complete surface removal of these sites has not adversely affected the sites’ overall significance.

Thank you for seeking my comments and considering historic properties as part of your undertaking. Please be advised that under certain circumstances, such as post-review discoveries or a change in the undertaking description, you may have future responsibilities for this undertaking under the PA and 36 CFR Part 800. If you require further information, please contact Alicia Perez of my staff at 916-445-7020 or at Alicia.Perez@parks.ca.gov or Natalie Lindquist of my staff at 916-445-7014 or at Natalie.Lindquist@parks.ca.gov.

Sincerely,

[Signature]

Julianne Polanco
State Historic Preservation Officer