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"Biological integrity, fiscal accountability, and community transparency"

October 17, 2023

City of Lancaster
Attn: Jocelyn Swain, Planning Dept.
44933 Fern Avenue
Lancaster, CA 93534
Via jswain@cityoflanasterca.gov

Re: Conditional Use Permit CUP 23-019, Hydrogen Electrolysis Plan,
Vicinity 55th Street East to 70th Street East north of Avenue K

Thank you for providing Site Plan drawings for the above referenced proposal. Several questions arose during Antelope Valley Conservancy's review of these materials, and we would appreciate your response to these questions prior to the City's proceeding with consideration of the project.

1. The project site contains a mile of Littlerock Wash yet the Site Plan does not indicate project impacts or impact avoidance in the wash, on its banks, or on upland areas. How will the fencing shown in the Site Plan be installed at the south and north ends of the wash on the site? How will workers or vehicles cross the wash within the facility? Will natural habitat upland buffers to be provided for wildlife dispersal along the wash?

Native species rely on ephemeral washes and creeks for resources, navigation, and north/south wildlife dispersal. Please point out the components of the Site Plan that address these questions or have the project proponent revise the Site Plan documents to include this information.
2. The Site Plan does not indicate lighting times on the property. Compliance with the Los Angeles County Dark Skies Initiative, Rural Outdoor Lighting District, or Roosevelt Community Standards District, if any, needs to clearly stated.
3. Lastly, the Site Plan shows storage tanks for 50,000+ gallons of water. Whether water used to extract hydrogen is drawn from well(s), the purple pipe system, or electrolyzed from ambient humidity, the water will leave the Antelope Valley and its benefits withdrawn from habitats, local citizens, and groundwater recharge. Although the consumption of hydrogen fuel may reconstruct water molecules, it is likely to be outside of the Antelope Valley watershed according to project literature. These large-scale impacts must be analyzed and clearly stated.

Thank you for providing prompt answers to these questions. AVC agrees with the October 12 letter from Lahontan Regional Water Quality Control Board and looks forward to a CEQA review.

ANTELOPE VALLEY CONSERVANCY

By Wendy Schiff, Director/Secretary