

FINAL ENVIRONMENTAL IMPACT REPORT

APPENDICES

Lane Ranch Towne Center Project

Prepared for:
City of Lancaster

Prepared By:



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

June 2009

Appendices

Appendix A

Bracketed Comment Letters



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
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STEPHEN R. MAGUIN
 Chief Engineer and General Manager

January 15, 2009

File No: 14-00.04-00

Ms. Jocelyn Swain
 Planning Department
 City of Lancaster
 44933 North Fern Avenue
 Lancaster, CA 93534-2461

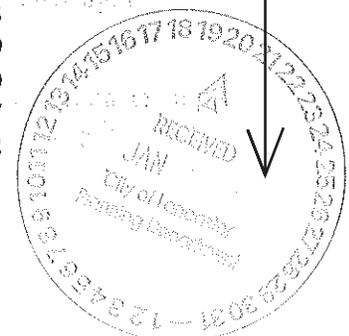
Dear Ms. Swain:

Lane Ranch Towne Center

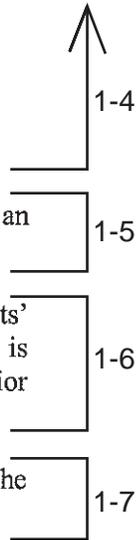
The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on January 9, 2009. The proposed development is located within the jurisdictional boundaries of District No. 14. We offer the following comments and updated information regarding sewerage service:

1. *Page IV.O-1, Environmental Setting, 1st paragraph:* The Lancaster Water Reclamation Plant (WRP) currently processes an average flow of 14.5 million gallons per day (mgd). 1-1
2. *Page IV.O-1, Environmental Setting, 2nd paragraph:* The Districts' 15-inch diameter trunk sewer in Avenue L at 52nd Street West still conveyed a peak flow at capacity when last measured in 2008. 1-2
3. *Page IV.O-2, Environmental Impacts, Project Impacts, 2nd paragraph:* The Lancaster WRP has an available capacity of 1.5 mgd. 1-3
4. *Page IV.O-2, Environmental Impacts, Project Impacts, Table IV.O-1, Proposed Project Wastewater Generation:* The Districts' average wastewater generation factor for retail is 325 gallons per day per 1,000 square feet (gpd/1,000 sf). There are several different ways to calculate the anticipated wastewater flow from the project site; however, based on Table II-1, Proposed Project Summary, on Page I-4 and the Districts' wastewater generation factors, the most accurate estimate is as follows: 1-4

Anchor 1	143,882 sf	100 gpd/1,000 sf	14,388 gpd
Anchor 2	127,029 sf	100 gpd/1,000 sf	12,703
Garden Center	33,192 sf	100 gpd/1,000 sf	3,319
Major 1	25,000 sf	100 gpd/1,000 sf	2,500
Drug	17,272 sf	100 gpd/1,000 sf	1,727
Shops	36,700 sf	325 gpd/1,000 sf	11,928



Pad 1 (assumed Restaurant)	6,500 sf	1,000 gpd/1,000 sf	6,500
Bank	5,000 sf	200 gpd/1,000 sf	<u>1,000</u>
		Total	54,065 gpd



5. *Page IV.O-3, Cumulative Impacts, 1st paragraph:* The Lancaster WRP currently processes an average flow of 14.5 mgd.
6. *Pages IV.O-4 and IV.O-5, Table IV.O-2, Cumulative Wastewater Generation:* The Districts' average wastewater generation factor for a single family home is 260 gpd, for park structures is 200 gpd/1,000 sf, for student is 20 gpd, for commercial/retail is 325 gpd/1,000 sf, and for senior housing is 156 gpd per unit.
7. All other information concerning Districts' facilities and sewerage service contained in the document is current.

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

Very truly yours,

Stephen R. Maguin

Ruth I. Frazen
 Ruth I. Frazen
 Customer Service Specialist
 Facilities Planning Department

RIF:rf



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County of Los Angeles

Executive Director
Randy Floyd

January 27, 2009

Ms. Jocelyn Swain
City of Lancaster
Department of Community Development
44933 North Fern Avenue
Lancaster, CA 93534-2461

Re: Notice of Availability:
Lane Ranch Towne Center Project - SCH No. 2007061012
The Commons at Quartz Hill Project – SCH No. 22007061059

Dear Ms. Swain:

Thank you for the opportunity to review the referenced projects.

After reviewing the documentation it appears that the proposed projects will have a significant impact on AVTA Route 7. AVTA respectfully requests that the following mitigation measures be implemented: 2-1

1. Include bus turnouts with full bus stops and amenities for both projects. Given the anticipated trip generation, double benches and shelters should be considered as well as shopping cart collection facilities. 2-2
2. Include the cost of 20% local match for three additional transit buses. These vehicles currently cost approximately \$550,000 each. 2-3
3. Plan for the operational costs associated with three additional transit buses and of reduced headways to 30 minutes on Route 7. Current estimates for this service increase are approximately \$400,000 annually. 2-4

Should you have any questions, please feel free to contact me at (661)729-2206.

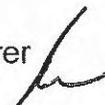
Sincerely,

Randy Floyd
Executive Director

C: file



Doug Burgis, President 

Randy Wolfe, Treasurer 

Pat Hartford, Vice President 

Pat Frahs, Councilmember 

Howard Dawson, Secretary 

qhtcouncil@gmail.com

(661) 943-9726

REFERENCE MATERIAL as provided by Donna Wolfe

The case of childhood obesity in the US is no less alarming, and according to childhood obesity facts for this country, there has been more than a doubling of obesity in preschool children as well as in adolescents aged between twelve and nineteen years of age. In the case of children aged between six and eleven years, this figure has tripled and it is believed that, at present, there are as many as nine million children aged six or above that are obese.

Other childhood obesity facts show that almost sixty percent of obese children aged between five and ten years have a minimum of one cardiovascular disease risk factor, and twenty-five percent had two or more risk cardiovascular disease risk factors. Also, childhood obesity facts point us in the direction that, for children born in the US in 2000, the lifetime risk of being diagnosed with type II diabetes is around thirty percent for boys and forty percent for girls, and this figure rises in the case of ethnic minority groups. Not a very rosy picture!

Information available through The Health Care Center at www.thehealthcarecenter.com.

Density of Fast Food Joints Affects Obesity Rates

Posted by Adam Kuban, January 14, 2008 at 6:30 PM

File under newsflash: University of Pennsylvania researchers have found that counties with a higher concentration of fast food joints also have higher obesity rates:

"We found that there was an association between the amount of full-service restaurants (with waiters) in the county one lives in and a lower risk of obesity," said Neil Mehta of the University of Pennsylvania.

"Conversely, we found that the increase in the number and the amount of fast food restaurants was associated with an increase in obesity," he added in an interview."

Density of fast food restaurants may up obesity levels

Patricia Reaney, Reuters

NEW YORK (Reuters Life!) - If you're worried about an expanding waistline where you eat may be just as important as how much, according to a new study.

American researchers have found evidence to support the notion that fast food restaurants could be a contributing factor to the rising levels of obesity in the United States.

In a study that looked at the availability of restaurants, rather than what people ate, they discovered that eating out can have both a positive and negative impact on obesity, depending on the type of restaurant.

"We found that there was an association between the amount of full-service restaurants (with waiters) in the county one lives in and a lower risk of obesity," said Neil Mehta of the University of Pennsylvania.

"Conversely, we found that the increase in the number and the amount of fast food restaurants was associated with an increase in obesity," he

added in an interview.

Mehta and Virginia Chang, of the University of Pennsylvania School of Medicine, used data from an annual telephone health survey and information from the 2002 U.S. Economic Census to examine the impact of the type and availability of restaurants on the weight of people who lived near them in 544 counties in the United States.

FACTBOX: Obesity is top health concern in U.S.

Thu Jan 22, 2009 6:05am IST

(Reuters) - The following are facts about obesity in the United States.

- * About two-thirds of adults in the United States are considered overweight or obese.
- * Obesity has increased dramatically over the past two decades.
- * In 2007, only one state, Colorado, had a prevalence of obesity less than 20 percent. Thirty states had a prevalence equal to or greater than 25 percent; three of these states -- Mississippi, Alabama and Tennessee -- had a prevalence of obesity equal to or greater than 30 percent.
- * An adult who has a Body Mass Index (BMI) of 25.0 to 29.9 is considered overweight. An adult with a BMI of 30 or above is considered obese. A BMI over 40 is defined as morbidly obese.
- * About 9 million adult Americans are defined as morbidly obese, according to the American Obesity Association. The morbidly obese population is growing at the fastest rate.
- * Obesity-related diseases include coronary heart disease, Type 2 diabetes, some cancers (endometrial, breast, and colon), hypertension, dyslipidemia, stroke, liver disease, gallbladder disease, sleep apnea, respiratory problems, osteoarthritis, and gynecological problems, including infertility.
- * Obesity is associated with more than 100,000 deaths each year in the United States.
- * The direct and indirect costs of being overweight or obese is \$117 billion per year, according to a 2000 report by the Office of the U.S. Surgeon General.

(Compiled by Debra Sherman in Chicago; Editing by Eddie Evans)

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Obese Children More Prone To Asthma

ScienceDaily (Jan. 18, 2001) - Fat children are at greater risk of asthma than children of normal weight, finds a study published in Thorax. Researchers at King's College London, investigated a representative sample of almost 10,000 children between the ages of 4 and 11 in Scotland and England, and in addition included more than 5000 children from 20 English inner city areas. The data were collected in 1993 and 1994. Asthma and wheezing were significantly associated with weight, with the heaviest children the most likely to have these symptoms.

Children Living Near Major Roads At Higher Asthma Risk

ScienceDaily (May 23, 2005) - SAN DIEGO --Children living close to a major road are significantly more likely to have asthma than children

major road are significantly more likely to have asthma than children who live farther away, according to a study presented today at the American Thoracic Society International Conference on May 23. The study found that children living within 75 meters (about 82 yards) of a major road had an almost 50 percent greater risk of having had asthma symptoms in the past year than were children who lived more than 300 meters (about 328 yards) away.

"These findings are consistent with an emerging body of evidence that local traffic around homes and schools may be causing an increase in asthma," said lead author Rob McConnell, M.D., associate professor of preventive medicine at the Keck School of Medicine of the University of Southern California. "This is a potentially important public health problem because there are many children who live near major roads." The study included more than 5,000 5- and 6-year-old children living in Southern California, who were part of the Children's Health Study. The researchers determined how far each participating child lived from a major road: a freeway, large highway or a feeder road to a highway or freeway.

"The next step will be to verify these results with actual measurements of pollution around the homes near and distant from major roads, and to see if children who live in areas with heavy traffic develop asthma as we follow them," McConnell said.

McConnell noted that California has passed a law that prohibits building any new school within 500 feet of a freeway or busy highway.

"If we establish that children's asthma is linked with heavy traffic, then it's likely to be a long-term and expensive proposition to begin to design cities to separate transportation corridors from where children live, go to school, and engage in outdoor exercise," he said.

###

The Children's Health Study is supported by the National Institute of Environmental Health Sciences, the Environmental Protection Agency, the California Air Resources Board, the National Heart, Lung and Blood Institute, and the Hastings Foundation.

Heavy Traffic Makes Breathing A Burden In Children
 ScienceDaily (Dec. 17, 2007) - Exposure to traffic pollution may increase respiratory problems and reduce lung volumes in children with asthma, according to researchers who studied the effects of road and traffic density on children's lung function and respiratory symptoms in the border town of Ciudad Juarez in Mexico.

"Our results show that close proximity to vehicular traffic-related emissions, either at home or at school, can lead to chronic effects in the respiratory health of children with asthma," said Fernando Holguin, M.D., M.P.H., assistant professor of pulmonary medicine at Emory University School of Medicine, and lead author of the study, which appeared in the second issue for December of the American Journal of Respiratory and Critical Care Medicine.

Traffic-related pollutants are known to be associated with asthma severity, but to what extent they affect airway inflammation and lung volume in both asthmatic and nonasthmatic children was unknown. "Major cities along the northern and southern US borders often have high levels

cities along the northern and southern US borders often have high levels of vehicular traffic flows, especially at the border crossing points. Vehicular traffic emissions from the high density of border crossing traffic may be negatively affecting the health of populations who live in nearby areas," said Dr. Holguin.

To investigate how specific traffic-related pollutants affected children's lung function and respiratory symptoms, the researchers recruited 200 age- and sex-matched asthmatic and non-asthmatic schoolchildren from ages six to 12. Over the course of a year, they measured road and traffic density and traffic-associated pollutants near the children's homes and schools, and evaluated each child's lung function and respiratory symptoms consecutively for four months. Asthmatic children, but not children without asthma, were affected by living in homes in areas with high road density. They had higher levels of exhaled NO, as well as reductions in both lung volume and airflow. Living within 50 meters of high density road areas increased the chances of respiratory symptoms in asthmatic children by more than 50 percent. "These results may have implications for asthmatic children residing in these conditions--especially among those who may not be adequately controlled with medications--for they may be more susceptible to vehicular emissions," said Dr. Holguin.

While increased traffic and road density near schools also indicated respiratory effects in both asthmatic and nonasthmatic children, the data did not attain statistical significance in this study. Nonetheless, Dr. Holguin noted, "this finding could have significant public health policy implications because a significant proportion of schools in many countries are located in close proximity to major roads."

This is the first study of its kind to evaluate traffic-related emissions exposure in a large group of children with and without asthma over an entire year. The findings support and add to previous studies which have looked at the effects of traffic emissions on children, but it may have been underpowered to detect significant associations between respiratory outcomes and specific pollutants.

"These results are significant because they quantitatively demonstrate that closer exposure to roads lead to chronic airway inflammation and reductions in lung function," said Dr. Holguin. "This study points the way for future research to determine what preventive measures may be taken to reduce exposure and or the health effects of vehicular emissions in susceptible children."

Traffic Exhaust Can Cause Asthma, Allergies And Impaired Respiratory Function In Children

ScienceDaily (Apr. 10, 2008) - Children exposed to high levels of air pollution during their first year of life run a greater risk of developing asthma, pollen allergies, and impaired respiratory function. However, genetic factors are also at play. These are the results of a new study conducted under the BAMSE project.

The BAMSE project has monitored 4,000 children in Stockholm county from birth in order to assess whether exposure to traffic pollution during their first year of life affects the risk of developing asthma and allergies. Levels of traffic exhaust were measured at the site of the

allergies. Levels of traffic exhaust were measured at the site of the home. The results show that the children who were exposed to high concentrations of pollutants ran a 60 per cent higher risk of suffering of persistent asthma symptoms. Respiratory function was also adversely affected, and the children were much more likely to be allergic to airborne allergens, particularly pollen.

Conclusions

1. Children who grow up in Stockholm are at greater risk of developing asthma, respiratory problems and pollen allergies if they live in areas where there are high concentrations of traffic pollution.

The BAMSE project is run by the Stockholm County Council's unit for Occupational and Environmental Medicine and the Institute of Environmental Medicine at Karolinska Institutet.

QUARTZ HILL TOWN COUNCIL

42263 50th Street West Suite 726

Quartz Hill, Ca. 93536

(661)943-9726



Quartz Hill Town Council's position on the proposed commercial projects at the corner of 60th Street West and Ave. "L" in the city of Lancaster. The items listed below indicate some of the reasons that the council is unable to support the proposed developments.

4-1

1. The major increase of traffic on Ave "L" namely East from 55th Street West to 40th Street West in the un-incorporated area known as Quartz Hill. The roadway goes from 2 lanes to 1 lane thus a major bottleneck. A major issue is that of the section on Ave "L" between 42th Street west 40th street west Eastbound. This is a single Eastbound lane with raised divider on the North and several apartment units on the South making it difficult for roadway expansion. Who does the improvement ? It should not be the taxpayers from the un-incorporated L.A. County.

4-2

2. It will have a major impact on the traffic flow from the Joe Walker Middle School on Ave. L-8 and 56th Street West, combined with the already very excessive traffic around Quartz Hill High School on the Southwest corner of Ave. "L" and 60th Street West. To include the daily traffic on Ave. "L" between 60th West and 40th. Street west.

4-3

3. The flood problem on Ave. "L" , between 52nd St. West. 50th St. West becomes impassable during the rainy season, and for several days following the rain the major retention basin at 45th. Street West and Quartz Hill Road is being drained onto our roadways, along with other retention basins. How does this get improved?

4-4

4. The report states that if the projects results in the need for extension of roads, and the developer is responsible for the improvements does that mean the developer pays on their own or does the property owner have to pay by whatever means? Does that mean the widening of Ave. L between 55th and 40th Street West?

4-5

5. The project known as Commons of Quartz Hill is projected to use 56,785 gallons of water per. day. The Lane project uses 43,000 gallons per. day, the development at Ave. K and 60th Street West will use a similar amount. Where does this high demand for water come from? We already have some housing tracks that cannot deliver the needed water.

4-6

6. The EIR states that development will cause an increase in crime in the area, The report does not address the effects of crime on the high school students, such as sex crimes, gang activities, the students themselves, shop-lifting, loitering, skipping school, etc. The issue of our childrens well being and safety must supercede any monetary gain.

4-7

7. The proliferation of fast food outlets directly across the roadway from Quartz Hill High school (relating to obesity). The students will gravitate to these outlets at any given opportunity, off-campus breaks, after school or even ditching school. School Boards throughout the Antelope Valley have either removed or are in the process of removing fast food and certain soda drinks on school campus. The concern is obesity of children and young adults, and research indicates this is either directly or indirectly the cause of many other medical problems.

4-8

8. Another issue, also health related, is the affects of respiratory and asthma incidents on children as it relates to the increased and close proximity of vehicular traffic, related emissions, not to exclude road debris that will be made airborne by the greatly increased traffic flow. Students are constantly involved in outdoor activities next to this proposed, heavy vehicular traffic and will be unnecessarily exposed to its effects.

4-9

The opinions and concerns being stated by this council should not be construed that we are against the involved commercial outlets. IT IS THE LOCATION.

4-10

These issue's could be resolved by not changing the zoning from residential to commercial. Don't put them next to our schools, move them further West or North.

On this date of February 17,2009 By vote of the Quartz Hill Town Council
We the undersigned are unable to support the proposed commercial projects at, 60th Street West and West Ave. "L" in Lancaster,for the above stated reasons.

Doug Burgis  _____ Pat Hartford _____

Howard Dawson _____ Randy Wolfe _____

Pat Frans _____

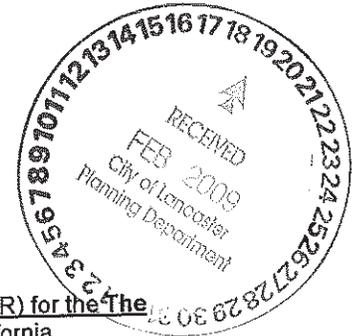
NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



February 17, 2009

Ms. Jocelyn Swain, City Planner
CITY OF LANCASTER
44933 Fern Avenue
Lancaster, CA 93536



Re: SCH#2007061059; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the The Commons at Quartz Hill Project; located in the City of Lancaster; Los Angeles County, California

Dear Ms. Swain:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ http://www.ohp.parks.ca.gov. The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
▪ If any known cultural resources have already been recorded in or adjacent to the APE.
▪ If the probability is low, moderate, or high that cultural resources are located in the APE.
▪ If a survey is required to determine whether previously unrecorded cultural resources are present.

√ 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.

- The final report containing site forms, site significance, and mitigation measurers 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.
▪ The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ The Native American Heritage Commission (NAHC) performed:
* A Sacred Lands File (SLF) search of the project 'area of potential effect (APE)': The results: No known Native American Cultural Resources were identified within one-half mile of the 'area of potential effect' (APE).. However the NAHC SLF is not exhaustive and local tribal contacts should be consulted from the attached list and the there are Native American cultural resources in close proximity..

- The NAHC advises the use of Native American Monitors, also, when professional archaeologists or the equivalent are employed by project proponents, in order to ensure proper identification and care given cultural resources that may be discovered. The NAHC, FURTHER, recommends that contact be made with Native American Contacts on the attached list to get their input on potential IMPACT of the project (APE) on cultural resources.. In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s) or Native American individuals or elders.

- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
▪ Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). in areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
▪ Again, a culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.

5-1

5-2

5-3

5-4

5-5



▪ Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

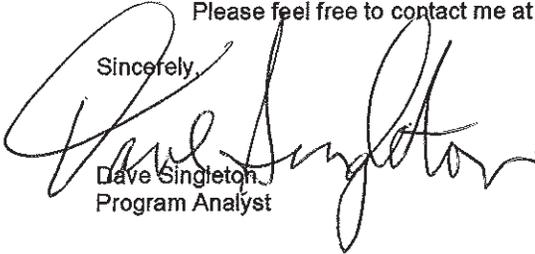
* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. .

Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.
√ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

5-5

5-6

5-7

5-8

Native American Contacts
Los Angeles County
February 17, 2009

Charles Cooke
32835 Santiago Road
Acton , CA 93510

(661) 733-1812 - cell
suscol@intox.net

Chumash
Fernandeno
Tataviam
Kitanemuk

San Fernando Band of Mission Indians
John Valenzuela, Chairperson

P.O. Box 221838
Newhall , CA 91322
tsen2u@live.com

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Fernandeño
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Thousand Oaks , CA 91362

805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Fernandeño

Randy Guzman - Folkes
4577 Alamo Street, Unit C
Simi Valley , CA 93063
ndnrandy@hotmail.com

(805) 905-1675 - cell

Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

Fernandeno Tataviam Band of Mission Indians

William Gonzales, Cultural/Environ Depart

601 South Brand Boulevard, Suite 102
San Fernando , CA 91340

Fernandeno
Tataviam

ced@tataviam.org
(818) 837-0794 Office
(818) 581-9293 Cell
(818) 837-0796 Fax

Kitanemuk & Yowlumne Tejon Indians

Delia Dominguez

981 N. Virginia
Covina , CA 91722

Yowlumne
Kitanemuk

(626) 339-6785

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2007061059; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Commons at Quartz Hill Project; located in the City of Lancaster; Los Angeles County, California.

ANTELOPE VALLEY JOINT UNION HIGH SCHOOL DISTRICT

44811 N. SIERRA HIGHWAY, LANCASTER, CALIFORNIA 93534-3226
(661) 948-7655

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BARBARA WILLIBRAND
ASSISTANT SUPERINTENDENT
STUDENT SERVICES

February 19, 2009

Ms. Jocelyn Swain
City of Lancaster Planning Department
44933 Fern Avenue
Lancaster, CA 93534



Reference: Lane Ranch Project
EIR Response

Dear Ms. Swain:

The Antelope Valley Joint Union High School District has reviewed the Draft Environmental Impact Report and appendices for the Lane Ranch project and has the following comments.

Although not identified in the EIR, it is our understanding the City will require the Developer to relocate the Quartz Hill High School parking lot driveway off of 60th Street West in order to align with the development's driveway off of 60th Street West. We also understand the Quartz Hill parking lot should be reconfigured to allow stacking since the subject intersection will be signalized.

6-1

Any of the above mentioned onsite improvements or any other onsite impacts need to be funded and provided by the developer and not the Antelope Valley Joint Union High School District. Construction time frame of these improvements needs to be scheduled to minimize the impact to the high school operations, such as during summer non-student days or summer school. The District needs to approve the proposed reconfiguration and be assured no loss of parking to the school. Construction traffic needs to be scheduled around the arrival and release times of students.

6-2

The District also needs to be assured traffic conditions offsite and onsite will be improved, not worsened by the development. The city needs to consider students walking to and from school from the homes currently east of the high school, and any future development. A safe route for these students needs to be provided.

6-3

If large retail stores are planned, the District is concerned about the possible increase in truancy due to the type of tenant. The District would expect the development to assist the District in mitigating this issue. The cost to provide additional needed security to mitigate this issue is an impact to the District. Currently, and in the past, students have parked on the street across from the school. This is due to inadequate parking on campus. The District is concerned students may elect to park within the development's parking lot. Additional parking on campus would mitigate this issue.

6-4

Sincerely,



Mat Havens
Director of Facility Acquisition and Development

Antelope Valley Mosquito & Vector Control District

P.O. Box 1192
Lancaster, CA 93584-1192
(661) 942-2917
Fax (661) 940-6367



February 23, 2009

City of Lancaster
Planning Department
Attn.: Jocelyn Swain
44933 N. Fern Avenue
Lancaster, CA 93534

Re: Draft EIR (SCH No. 2007061012) for "Lane Ranch Towne Center Project"

Dear Ms. Swain:

Thank you for giving us the opportunity to review the Draft EIR (SCH # 2007061012) for the "Lane Ranch Towne Center Project" at 60th Street West and Avenue L. The Antelope Valley Mosquito & Vector Control District is a special district charged with protecting public health within most of the City limits of Lancaster and Palmdale. Our main objective is to keep mosquito populations at a minimum. We take this responsibility very seriously. As such, we have reviewed the DEIR for the above named project and ask consideration of the following points:

As we have noted in our comments for the NOP for this project, we are particularly concerned about mosquito production in storm drainage facilities such as ditches, retention/detention basins and other Best Management Practices (BMPs) that would be built to treat stormwater and other urban runoff. Although we are aware that these BMPs are specified by the U.S. Environmental Protection Agency (EPA) under the Clean Water Act (CWA) to comply with National Pollution Discharge Elimination System (NPDES) permit requirements, they generate different challenges when it comes to mosquito reproduction (see references below).

Underground storm drain facilities often have debris and sediment deposits along the way. That will create small isolated puddles of water within the pipe that can serve as mosquito habitat. Furthermore, underground drains and vault spaces provide safe harborage for adult resting and over-wintering mosquitoes. Numerous studies conducted by the California Department of Public Health, California Department of Transportation (Caltrans) and several Vector Control Districts showed that adult female mosquitoes will fly through openings as small as 1/16th of an inch and over a distance of more than 100 ft to access water to lay eggs.

7-1

Board of Trustees

<i>L.A. County</i>	<i>Lancaster</i>
Joyce Axley	Randy Hall
Barbara Little	<i>Palmdale</i>
Amie Rodio	R. Dennis Persons

District Manager

Cei D. Kratz

Office Location

42624 6th Street East
Lancaster, CA 93535
E-mail: mosquito@avmosquito.org
Website: www.avmosquito.org

I would like to stress again that the BMPs are notorious for breeding tremendous numbers of mosquitoes (see references below). All BMP structures should be easily and safely accessible to allow AVMVCD technicians to effectively monitor and if necessary, abate mosquitoes.

7-2

I would also like to emphasize that creating mosquito breeding sites constitutes a public health nuisance under the California Health and Safety Code §2060 and may result in potential fines of up to \$1000 per day plus the cost of abatement until corrected.

7-3

It is therefore crucial that the applicant and the project owner and the City of Lancaster include a long-term plan for these drainage systems to be properly maintained. Customary annual or even bi-annual pumping of vault-type units is wholly inadequate to prevent mosquito reproduction. Ongoing research is looking into the possibility of mosquito exclusion in underground BMPs with manhole cover inserts.

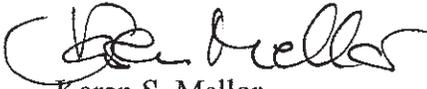
7-4

We ask that you keep mosquito production and public health in mind when constructing flood control facilities that will be able to hold water for any amount of time. In the summer months mosquito reproduction is very rapid, and as we have seen here last year, can have fatal consequences for local residents.

7-5

Please feel free to contact me at 661-942-2917 ext. 206 for any further information.

Sincerely,



Karen S. Mellor
Entomologist / Operations Supervisor
Antelope Valley Mosquito & Vector Control District

- References:
- Managing Mosquitoes in Stormwater Treatment Devices
<http://www.anrcatalog.ucdavis.edu/pdf/8125.pdf>
 - The Impact of New BMP Construction on Local Public Health Agencies
http://www.forester.net/sw_0203_stormwater.html
 - The Dark Side of Stormwater Runoff Management: Disease Vectors Associated with Structural BMPs
http://www.forester.net/sw_0203_dark.html



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Jon Sanabria
Acting Director of Planning

February 19, 2009

Ms. Jocelyn Swain
Associate Planner, Environmental
City of Lancaster Planning Department
44933 Fern Avenue
Lancaster, CA 93534



Dear Ms. Swain:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE LANE RANCH TOWNE CENTER PROJECT

Los Angeles County ("County") appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed commercial development ("Project") located at the southeast corner of the intersection of 60th Street West and Avenue L in the City of Lancaster ("City"). Development of this project includes approximately 394,575 square feet of commercial retail facilities. The County provides the following comments on the DEIR.

8-1

Project Description

- The map scale of the land use map (Figure III-1) does not allow the readers to identify the land uses of the project site and its surrounding area. The project site also needs to be properly labelled on this map.
- On Page III-9, in Table III-1, the correction location of project no. 82 should be the northwest corner of 60th Street West and Avenue K.

8-2

8-3

Climate Change/Global Warming

- On page IV.D-24 in discussing the Project's consistency with Building Energy Efficiency Standards, the DEIR should clarify whether such standards and requirements are adopted as part of the City's Title 24.

8-4

- On page IV.D-35 in discussing the Project's consistency with the Alternative Fuels strategy, the DEIR should also focus on whether the proposed parking lots will have facilities that can recharge electric vehicles and refuel other alternative energy vehicles such as those utilizing compressed natural gas. 8-5
- On page IV.D-26 in discussing the Project's consistency with the Green Building Initiative, the DEIR indicates that the Project will comply with Title 24 of the City municipal code. However, there is no indication whether the City's Title 24 contains provisions to ensure that the Project will achieve the 20% energy use reduction goal. 8-6
- On page IV.D-26 in discussing the Project's consistency with the California Solar Initiative, the DEIR concludes that the Project is consistent with such initiative based on the assumption that solar roofs could be installed in the future. Such assumption is speculative and should not be used as a base to reach the consistency conclusion. 8-7
- All measures listed on pages IV.D-37 to 39 should be formally included as mitigation measures under respective factors if the retailer Target is committed to their implementation. Also, many of these measures should be used to clarify Mitigation Measure D-15. 8-8

Land Use and Planning

- The County does not agree with the assessment provided on Page IV.J-7 that "...inconsistency is not an impact under CEQA-plan inconsistencies in and of themselves are not significant impacts on the environment under CEQA..." 8-9

CEQA requires a project to analyze its land use consistency. Amendment to General Plan or zone change request itself does not make a project consistent unless the approval of such request is substantiated by factual findings. Because the Project site is immediately adjacent to the unincorporated land of residential uses, the County requests that the DEIR include the City's independent assessment of general plan amendment and zone change requests and include the assessment in the analysis of Objective 18.1.

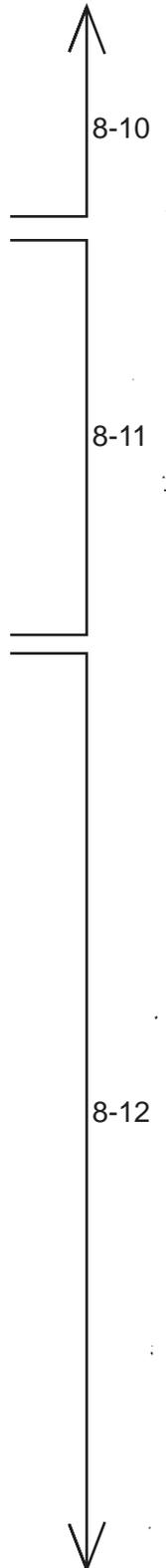
Noise

On page IV.K-25, the DEIR states that the noise levels generated by load dock activities would not exceed the maximum noise level allowed for single events at the single-family events and therefore the noise impact is less than significant. The County disagrees. According to the site plan, the 8-10

anchor stores' truck loading areas are placed immediately west of the residential area. Delivery trucks and trash collectors generally arrive early in the morning or late night when the background noise level is low. The DEIR should include additional mitigation measures either to restrict delivery hours or to construct sufficient sound barrier walls sheltering the residents from such noise.

Biological Resources

- **Baseline information:**
The project site is comprised of an active ranch primarily utilized for keeping livestock; irrigated pastures used as grazing fields, barns and residential dwellings. The project site is landscaped with cottonwood trees (*Populus fremontii*), and the southern portion of the project site contains bare areas which are devoid of any significant vegetation and are used for storing equipment. The western portion has irrigated pastures, stables, storage sheds, and other barn and residential buildings. The study area contains no riparian habitat or hydrological resources.
- **Loss of nesting, foraging, and roosting habitat of native birds:**
Since the project site is in proximity of open areas (Rabbitbrush scrub to the south; Joshua Tree woodland to the northeast; and a riparian area and open fields to the northwest), it could provide a foraging and nesting habitat for native birds. The County Biologist observed Red-tailed Hawks mating on one of the telephone poles at the south border of the project. The female was also roosting on a Cottonwood that was on the adjacent Rabbitbrush scrub area to the south. The Biologist also observed Audubon's Cottontails (Rabbits) and Beechey's Ground Squirrels in this area and Beechey's Ground Squirrels in the Quartz Hill Commons open area to the northwest. These are both potential forage items for the Hawks and the Barn Owl that was found along the roadside near the Quartz Hill Commons open area. It appeared that there may have been many Ground Squirrel holes in the Rabbitbrush scrub area to the south, but many of these have been covered over. There are active Beechey Ground Squirrel holes, and in addition there are some active small holes in the Rabbitbrush scrub where no occupants were observed. Birds observed foraging (going between the Rabbitbrush scrub and the project property) included a pair of Say's Phoebes, American Raven, Western Meadowlark, House Finches, White-crowned Sparrows, White-throated Sparrow, a pair of Kildeers, Mourning Doves. (Invasive birds--numerous Starlings and Rock Doves--were also observed feeding on the project property, but not in the Rabbitbrush scrub.) Given the broad range of the bird species with potential to forage on-site, and the availability of large areas of foraging habitat in the region, impacts to bird foraging habitat from the proposed project could be significant. We believe that completely removing the trees from the project site will



negatively impact connectivity and roosting habitat of birds. Lack of trees will also influence abundance of migratory birds which may winter in the area. Availability of suitable nesting trees and other nesting habitat may be limited and/or spotty in the Antelope Valley. The Red-tailed Hawks observed could well nest in the Cottonwoods of the project parcel as there are few other really tall trees nearby, so implementation of the project with removal of the Cottonwoods could impact breeding of the Red-tailed Hawks as well as migratory birds. Although focused surveys for burrowing owls were negative, the project site contains several suitable burrows which could potentially be colonized by burrowing owls in the region prior to site construction. The removal of occupied burrowing owl burrows during vegetation removal and grading associated with site development would be considered a significant impact.

- Recommended mitigation measures:

- (1) Conduct vegetation removal associated with construction from September 1st through November 30th, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally in this same period) and keep vegetation disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys and procedure thereafter shall be repeated.
- (2) Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nest shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum exclusion buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist, shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City's

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Planner in charge of Mitigation Monitoring, depending on which jurisdiction has the construction activity. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests occurs, pre-construction and during construction lapses.

- (3) In order to avoid adverse impacts to burrowing owl, a pre-construction survey for burrowing owls shall be performed on the project site within 30 days prior to ground disturbance. The survey shall be performed according to accepted burrowing owl survey protocols by a qualified biologist. The results of the survey shall be reported to CDFG and the City of Lancaster prior to ground disturbance. If any burrowing owls are found on-site during the pre-construction surveys, passive relocation of the owls shall be completed outside of the nesting season according to California Burrowing Owl Consortium guidelines; a report shall be prepared by a qualified biologist following any passive relocation efforts documenting the methods and results of the relocation activities. All ground disturbance associated with site development and construction shall be postponed until passive relocation efforts have been completed and the associated report has been submitted to CDFG and the City of Lancaster.
- (4) The cottonwoods provide suitable nesting habitat for migratory birds and generalist birds, which are protected under the federal Migratory Bird Treaty Act and the State Fish and Game Code (Sections 3503, 3503.5, and 3512). Construction activities including vegetation removal, noise and vibration have a potential to result in direct (i.e. death or physical harm) and indirect (i.e. nest abandonment) adverse impacts to nesting birds; these impacts would be considered significant. To mitigate the significant impact, the remaining living non-invasive trees on site should be preserved, possibly in planter islands within parking areas. If more trees could be planted in such planter islands, the plantings should be local native plants, particularly California Junipers and Joshua trees. Careful planting with soil amendments known to improve viability such as appropriate mycorrhizae should be done. Parking areas and other hardscape of the development should drain into the planters.
- (5) Mitigation for Non-Listed Special Status Species Subject to CEQA Review (Joshua Tree Woodland)
In the event that tree habitat cannot be preserved, in order to mitigate for unavoidable impacts to special status species below a level of significance under CEQA, it is recommended that there be acquisition and/or preservation of suitable occupied habitat of equal or superior

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Jocelyn Swain
February 19, 2009
Page 6

quality with the establishment of a non-wasting endowment for the long-term management of these habitat management lands. The land should be deeded to a local Land Conservancy for management and protection in perpetuity under a conservation easement to prohibit incompatible uses on the site. Mitigation should take place within the local area where impacts have occurred to conserve the biological diversity within the area. Digging up Joshua trees and transplanting into other areas should not be considered appropriate mitigation of loss of Joshua tree woodland vegetative communities as these methods are experimental and there are no assurances of their success.

Various County departments including Parks and Recreation, Public Works, and Sheriff also reviewed the DEIR. Their comments are incorporated here by reference and attached for your consideration.

If you have any questions about this letter, please contact me at (213) 974-6559 or hchen@planning.lacounty.gov, Monday through Thursday from 7:30 a.m. to 6:00 p.m.

Sincerely yours,

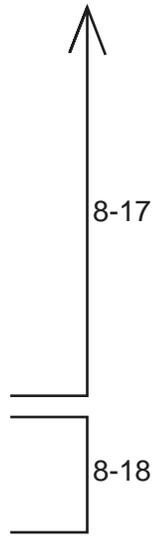
DEPARTMENT OF REGIONAL PLANNING
Jon Sanabria
Acting Director of Planning

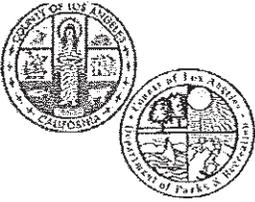


Hsiao-ching Chen, PhD, AICP
Supervising Regional Planner

JS:hc

C: Paul Novak, Deputy, Supervisor Antonovich
Norm Hickling, Deputy, Supervisor Antonovich
Chief Executive Office, Office of Unincorporated Area Services
Department of Parks and Recreation
Department of Public Works
Sheriff Department





COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"

Russ Guiney, Director

February 11, 2009

TO: Hsiao-Ching Chen, AICP
Supervising Regional Planner
Department of Regional Planning

FROM: Joan Rupert, Section Head 
Environmental Section

SUBJECT: **LANE RANCH TOWNE CENTER PROJECT**
DRAFT ENVIRONMENTAL IMPACT REPORT

The DEIR for the proposed Lane Ranch Towne Center project has been reviewed for potential impacts on the facilities under the jurisdiction of this Department. We have determined that the proposed project may impact George Lane County Park located at 5520 West Avenue L-8, Quartz Hill, CA 93536.

9-1

It is not anticipated that the proposed project would increase usage of George Lane Park because the project does not include the development of new residential units. However, traffic in the area is a concern because the proposed project is located less than a mile from the park. According to the DEIR, the project along with other proposed developments in the area will further degrade traffic conditions at many of the intersections. Specifically, increased truck and other traffic related to the development and operations of the proposed project could reduce the quality of road infrastructure and the levels of service of 60th Street West, West Avenue L, and adjacent streets which provide vehicular access to the park.

9-2

If you have any questions or need clarification, please feel free to contact me at (213) 351-5126 or jrupert@parks.lacounty.gov.

c: Norma E. Garcia, Kathleen, Ritner, Larry Hensley, Clement Lau
(Parks and Recreation)

February 12, 2009

TO: Hsiao-ching Chen, PhD, AICP
Unincorporated Area Services Liaison
Department of Regional Planning

FROM: Steve Burger
Land Development Division
Department of Public Works

**NOTICE OF AVAILABILITY/DRAFT ENVIRONMENTAL IMPACT REPORT
LANE RANCH TOWNE CENETR PROJECT (TARGET)
CITY OF LANCASTER**

As requested, we have reviewed the Draft Environmental Impact Report (DEIR) for the proposed commercial center that includes a Target Supercenter. The project is located at the southeast corner of the intersection of 60th Street West and Avenue L. The project also includes a general plan amendment and zone change to redesignate the project site from urban residential to commercial and rezone the project site from R-7,000 and R-10,000 to commercial planned development.

10-1

The following comments are for your consideration in responding to the City of Lancaster:

Hydrology/Water Quality

1. Page IV.I-2, Surface Water Hydrology: The DEIR indicates that the project site drains toward the northeasterly corner of the project site. The last sentence of the third paragraph contradicts that (as well as first sentence of Drainage Section on page IV.I-6). These discrepancies should be resolved.
2. Page IV.I-6, Operation: The DEIR indicates that runoff from the project site would have the potential to create erosion offsite that would cause water quality impacts elsewhere and that onsite Best Management Practice would prevent potential impacts. Best Management Practices are used for water quality not impacts/alternation of drainage. Discuss whether potential impacts will affect unincorporated County areas and propose mitigation measures, as applicable.

10-2

10-3

3. Page IV.I-6, Drainage: The DEIR indicates that the proposed storm drain on Avenue L will serve the project site and the storm drain terminus will outlet through an energy dissipater structure or a "proposed" storm drain.

a) Discuss whether concentrated flows will impact unincorporated County areas and propose mitigation measures, as applicable.

b) Clarify whether the "proposed" storm drain is a future storm drain, and if the energy dissipater is the alternative in the event the "proposed" storm drain has not been constructed.

10-4

4. Page IV.I-7, Cumulative Impacts: The DEIR indicates that most of the runoff from the site would be collected or conveyed to the proposed storm drain system. The proposed project would also increase the stormwater volume and rate in the area. Discuss whether discharges from the proposed storm drain outlet will impact unincorporated County areas and propose mitigation measures as applicable.

10-5

5. Page IV-I-10, Project-Specific Mitigation Measures: The DEIR indicates that the project-specific mitigation measures are required to mitigate projected increase of runoff from the site. Mitigation measure I-5 indicates that the proposed storm drain terminus will be westerly of Avenue L. However, mitigation measure I-4 calls for improvements to the existing basin at the northwest corner of 57th Street West and Avenue L. Clarify whether and how measure I-4 mitigates stormwater volume and rate from the project site if the runoff from the site is collected/conveyed to a proposed storm drain system located westerly of the basin. Also discuss whether the existing basin has capacity for the additional flows and if there are impacts to unincorporated County areas and propose mitigation measures as applicable.

10-6

For questions regarding Hydrology/Water Quality comments above, please contact Lizbeth Cordova at (626) 458-4921.

Traffic/Access

The Traffic Section of the DEIR is incomplete and should be revised to address the comments below. All corresponding assumptions, calculations, figures, tables, and mitigation measures in the Traffic Impact Analysis (TIA) should be adjusted accordingly and reflected in the DEIR. Based on these revisions, additional comments may be forthcoming after subsequent review.

10-7

1. We expect the following intersections and roadway segment may be significantly impacted by the project and/or cumulative traffic and should be added to the list of study locations. The County's TIA methodology should be used when evaluating these intersections and roadway segment.
 - a) 55th Street West at Avenue L-8
 - b) 50th Street West at Avenue L-8
 - c) 50th Street West at Columbia Way
 - d) 50th Street West at Avenue K
 - e) 70th Street West at Columbia Way
 - f) Avenue L-8 between 50th Street West and 60th Street West

10-8

2. Table IV.N-5 and 6, Estimated Weekday and Weekend Project Traffic Generation: The DEIR and associated TIA should provide justification for all proposed trip reduction factors related to internal trip and pass-by reductions. Specifically, the documents should provide empirical evidence, such as field counts at similar projects with similar settings or case studies, which support the proposed reduction percentages. Although the DEIR identifies a range of reductions provided in the Institute of Transportation Engineers Trip Generation handbook, it does not adequately justify the specific reduction applied in the trip generation calculations.

10-9

3. Figure IV.N-8, Project Traffic Distribution: The basis of the trip distribution is not adequately supported. We expect the majority of trips will originate/end in areas south and east of the project site. Therefore, we ask for additional information on the distribution being used or amend it so that more trips are directed in the south and east direction. The project assignment percentages should be revised to indicate the percentages for the project's driveway.

10-10

4. The following projects should be added to the list of related projects:

Related Cases	Locations	Land Use
CUP 98-05	Northwest Corner of Avenue J-8 and 60th Street West	Church
TTM 60450	West Corner of 60th West and 660 feet South of Avenue K	Single-Family
TTM 67582	Northeast Corner of 52nd Street West and Avenue J	Single-Family
TTM 69132	Northeast Corner of 55nd Street West and Avenue K-8	Single-Family
TTM 65510	Northeast Corner of 80th Street West and Avenue K	Senior Housing

10-11

5. The DEIR should provide the tables and figures to support the related projects trip generation and distribution used in the cumulative impact analysis. 10-12
6. The following intersections fall under the County's jurisdiction and the County's traffic impact analysis methodology should be used when evaluating them. We expect these intersections may be significantly impacted by the project and/or cumulative traffic. 10-13
 - a) 60th Street West at Avenue L-4
 - b) 60th Street West at Avenue L-8
 - c) 60th Street West at Columbia Way
 - d) 55th Street West at Avenue L
 - e) 50th Street West at Avenue L
 - f) 45th Street West at Avenue L
 - g) 40th Street West at Avenue L
7. Although Page IV-N.14 of the DEIR states that the County's methodology was used in the analysis, it was not properly applied in the level of service (LOS) calculations. The LOS analysis at County intersections should be conducted for the following traffic scenarios: 10-14
 - a) Existing traffic
 - b) Existing traffic plus ambient growth to the year the project will be completed (pre-project)
 - c) Traffic in (b) plus project traffic
 - d) Traffic in (c) with the proposed mitigation measures (if necessary)
 - e) Traffic in (c) plus cumulative traffic of other known developments
 - f) Traffic in (e) with the proposed mitigation measures (if necessary)
8. The proposed mitigation measures should be consistent with the County's proposed roadway improvement project for Avenue L from 40th Street West to 55th Street West. Note that our proposal was generated in response to a request from the City of Lancaster to create a trip fee program for these corridors. This has subsequently been adopted by the City as Resolution No. 06-163. Specifically, the project's proposed mitigations for 50th Street West at Avenue L should include the following lane configuration, which is currently proposed for the County's improvement project. We have attached a copy of the conceptual drawing for your use. 10-15
9. Pending the result of the revised cumulative impact analysis, the project should contribute its proportionate share of the cost for mitigation measures. 10-16

10. Submit conceptual striping plans and corresponding cost estimates for all proposed mitigation measures at County and County/City intersections to Public Works' Traffic and Lighting Division for review.

10-17

If you have any questions regarding the traffic/access comments, please contact Nayiri Vartanian at (626) 300-4709.

Other-Road/Maintenance

1. Currently, Avenue L, west of 50th Street West, is classified as a local road on the Master Plan of Highways. This road may need to be reclassified as a major roadway due to the cumulative impact of this and other projects. The DEIR should discuss and address if roadway reclassification is required.

10-18

2. The proposed change in zoning from residential to commercial will result in an increase of truck traffic to the area. Due to the size and type of the proposed development, the geotechnical and materials report should address whether the impacts to existing access roadways due to truck traffic will require an increase in the pavement section and reconstruction of the roadways.

10-19

3. There are two concrete cross gutters on Avenue L west of 60th Street West. In order to minimize damage to the pavement caused by runoff and nuisance water, the DEIR should address the feasibility of replacing the cross gutters with box culverts to carry these flows under the roadway and off of the riding surface.

10-20

4. The DEIR does not state how much soil export and/or import will be necessary for this project. If there is 10,000 cubic yards or more of import or export as part of this project and it is to be hauled over roadways within County jurisdiction, a hauling route must be clearly identified. The project should also comply with current Standard Urban Stormwater Mitigation Plan and Low Impact Development requirements.

10-21

If you have any questions regarding the above road comments, please contact Nallely Olguin, Maintenance District 5, at (661) 947-7173, Extension 234.

Services-Water

This project is within the boundaries of Waterworks District No. 40's service area, not Quartz Hill Water District as indicated in the DEIR. The Los Angeles County Waterworks District No. 40, Antelope Valley, is unable to assure adequate water supply for this project. The DEIR does not adequately address significant water

10-22

supply impacts. The acquisition of new or expanded water supply sources must be secured by the project proponent prior to project approval. The Waterworks District typically does not upgrade or expand the water system to accommodate future growth.

To reduce project impacts on existing water supply system and as conditions of this project, the Draft EIR should adequately address all of the following as apart of the document:

1. Evaluate this project impacts based on the increase in water demands and potential increase in fire protection. Mitigation measures should incorporate water system improvements/upgrades. 10-23
2. Secure water supply allocation. 10-24
3. Construct or financially participate in a secondary emergency water supply, by constructing necessary well(s), disinfection facilities, forebay tank(s), pipelines, and pump station(s). 10-25
4. Construct or financially participate in the construction of a storage tank at Ave M and 62nd Street West of adequate size to provide fire protection until project fire demands are determined by the Fire Department. Infrastructure requirements will be determined based on required level of fire protection. 10-26
5. Construct or financially participate in the installation of a 36-inch water main along 60th Street West, from Avenue L to Avenue M and 62nd Street West. 10-27
6. Construct water main along Avenue L fronting Project. 10-28
7. Construct on-site facilities meeting all health and safety codes, and all domestic water service meter and fire protection connections shall have a backflow device to prevent contamination of the public water system. 10-29

If you have any questions regarding water comments, please contact Greg Even at (626) 300-3331.

Services-Sewer

1. Effective July 1, 2008, the City of Lancaster ceased to be part of Consolidated Sewer Maintenance District. 10-30

The County of Los Angeles Department of Public Works Consolidated Sewer Maintenance District is responsible for the operation and maintenance of the local sewers within the Unincorporated County of Los Angeles. The City of Lancaster owns and maintains the sewer lines within the City. The DEIR should reflect these changes and clarify how the project sewer connection will affect the sewer lines in the unincorporated County areas.

10-30

2. A review of the project location and the alignment of the existing sewer line shows that it could outlet into a County local sewer line, which discharges into a County Sanitation Districts trunk sewer. The DEIR should address the sewer alignment and availability of sewer capacity in the local sewer line and its effect on the sewer portion in the unincorporated County area if any.

10-31

An agreement between the City and the County may be required to allow for the ongoing conveyance of the City's wastewater through the County's local sewer system. Alternately, the City may contact the Sanitation Districts for possible annexation of the portion of the local sewer line within the unincorporated County into the Sanitation Districts trunk sewer system.

10-32

If you have any questions regarding the above sewer comments, please contact May Hong at (626) 458-3388.

Other-Environmental Safety

1. Storage Space for Recyclables

The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each development project to provide an adequate storage area for collection and removal of recyclable materials. The DEIR should include/discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for this project.

10-33

2. Underground Storage Tanks

- a) Should any operation within the subject project include the construction, installation, modification or removal of underground storage tanks Public Works' Environmental Programs Division must be contacted for required approvals and operating permits.

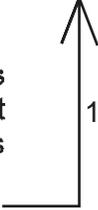
10-34

- b) According to the Hazardous Materials System database: 5800 West Avenue L (Lane Ranch, File 011449-011489)-The owner of the site

10-35

Hsiao-ching Chen
February 12, 2009
Page 8

registered a 1,000 gallon Unleaded Gasoline UST in 1986 although it is unclear as to when it was removed. The owner never applied for a permit to remove nor did they turn in a site assessment. This issue remains open.



10-35

For questions regarding the environmental safety comments above, please contact Corey Mayne at (626) 458-3524.

If you have any other questions, please contact Mr. Toan Duong at (626) 458-4945.

MA:

P:\dpub\CEQA\CDM\ Lancaster_Lane Ranch Towne Center_DEIR.doc



Lucy D. Baca, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



(661) 948-8466

February 10, 2009

Ms. Hsiao-Ching Chen, PhD, AICP
Supervising Regional Planner
320 West Temple Street
Los Angeles, California 90012



FEB 23 2009

Subject: 60th Street West and Avenue L, Commercial Projects

Dear Ms. Chen:

We received your request for information regarding possible public safety issues related to the referenced projects. We will attempt to address some of the issues raised by residents in the area with regard to crime and safety.

11-1

As you know, these projects are directly adjacent to Quartz Hill High School, one and one half miles from Sundown Elementary School, and one mile from Joe Walker Intermediate School.

As we indicated in our initial response to the Environmental Impact Report, we do not believe that development of these centers will have a significant impact on the Los Angeles County Sheriff's Department. However, there will be some impact, as the property is currently vacant and does not generate any calls for service.

11-2

We do not feel that these projects will create any significant public safety hazards for students, parents, or staff at either of these schools. Safety concerns that have been raised by residents in the immediate area are: truancy, availability of alcohol and tobacco products, drunk drivers, criminals loitering in the parking lots, criminal and/or gang activity in the parking lots, overnight RV parking, and deputies not being available to residents in the area because they are busy with criminal activity in the shopping centers.

11-3

With regards to truancy, Lancaster Station does have programs in place to deal with truancy. "Safe Passage" is a program funded by the school district, where a deputy patrols the areas of specific schools Monday through Friday, beginning one hour prior to, and concluding one hour after, the school schedule. In addition, Lancaster Station fields a two-man truancy car that patrols eight hours per day, Monday through Friday. The centers are in the sphere of influence of the Quartz Hill High School Deputy, and the West Side Union School District Deputy. The Antelope Valley Union High School District does field truancy officers that are available to respond to reports of truant high school students. All of these resources would be made available for routine patrol checks, and responding to calls regarding students at the centers during school hours. We feel that there are currently sufficient resources in place to deal with any truancy issues that may arise at these centers.

11-4

With regards to the availability of alcohol and tobacco products, the Sheriff's Department conducts ongoing compliance checks at locations that are licensed to sell alcohol and tobacco products. Several compliance checks using minor decoys have been conducted over the past three years throughout the Antelope Valley. All of the Wal-Mart and Target stores were checked multiple times, and our decoys were never able to purchase alcohol or tobacco products at any of their locations. The Sheriff's Department will continue to conduct compliance checks and will aggressively investigate any reports of locations selling alcohol or tobacco products to minors.

11-5

Regarding drunk drivers, to our knowledge, no bars or nightclubs are planned to open in either of the centers. Historically, these types of centers have not created any increase in drunk driving, and we do not think this will be an issue.

11-6

With regards to suspicious persons loitering, home improvement centers do often attract day laborers. This could be a possible concern of parents whose children would walk through the center on their way to and from school. In order to address this concern, we recommend that a condition of approval for this center be the presence of private security officers on the site, proper posting of loitering prohibitions, and aggressive enforcement of loitering laws by the management. With regards to overnight recreational vehicle parking, we agree that this practice causes some problems. It is Wal-Mart's intent to attract responsible citizens traveling cross country to park overnight in their parking lots and patronize their stores. However, we have had problems with not so responsible locals who park their dilapidated recreational vehicles and live out of them in the parking lots. For that reason, the Sheriff's Department would discourage this well intended practice. A condition prohibiting overnight parking could be included into the Conditional Use Permit.

11-7

With regards to overall crime, both centers are in the city limits of Lancaster and will be patrolled by city units. We feel that we have adequate resources to sufficiently handle criminal issues generated by these centers. The Sheriff's Department has significantly increased its resources in Lancaster. Recently formed special teams would be available to address any significant crime problems in these centers should they arise. If these centers generate excessive calls for service, the Sheriff's Department and the City of Lancaster have the ability to increase staffing in the area by adding or shifting resources.

11-8

Another approach is for the centers to contract for a dedicated deputy. This has proven very successful to eastside shopping centers that are adjacent to each other in Lancaster. Wal-Mart, Stater Brothers, and the owner of the Stater Brothers Center, share the cost to contract for a deputy who is assigned to patrol only the two shopping centers. This is an idea that should be addressed with the appropriate parties.

11-9

The City of Lancaster and Los Angeles County Sheriff's Department are committed to the safety of the citizens in the city and surrounding areas. We hope that this information is helpful. If we can be of further assistance, feel free to contact Deputy Michael Kuper, Monday through Friday, 8:00 a.m. to 4:00 p.m., (661) 948-8466, extension 4021.

11-10

Sincerely,

LEROY D. BACA, SHERIFF



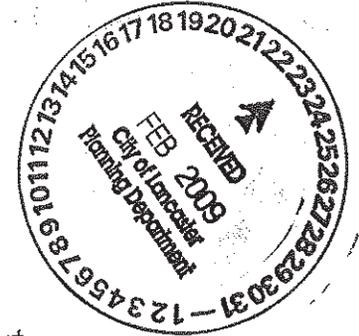
Axel H. Anderson, Captain
Lancaster Station



Cathy Hart
(661) 726-5608
FAX (661)726-5615

February 23, 2009

Ms. Jocelyn Swain, Environmental Planner
City of Lancaster Planning Department
44933 North Fern Avenue
Lancaster, CA 93534



RE: The Notice of Availability of a Draft Environmental Impact Report (DEIR) for The Lane Ranch Towne Center

Dear Ms. Swain:

Southern California Edison (SCE) appreciates the opportunity to review and provide comment on the DEIR for The Lane Ranch Towne Center. The project is described in the DEIR as a proposal to develop a commercial retail center on 35 acres having approximately 394,575 square feet of commercial retail. The project is stated to be located at the southeast corner of 60th Street West and Avenue L, in the City of Lancaster.

12-1

SCE's comments regarding the proposed project address electric service provision, potential impacts to existing SCE facilities, and the California Public Utilities Commission (CPUC) process for implementing the requirements of the California Environmental Quality Act (CEQA).

Electric Service Provision

SCE is the provider of electricity for this project. This letter is to advise The City of Lancaster the electrical loads of this project have been determined to be within the parameters of the projected load growth which SCE is planning to meet in this area.

12-2

SCE undertakes expansion and/or modification of its electric systems and infrastructure to serve the load growth of existing customers and new projects. Since SCE's electrical system is provided by a network of facilities (SCE's electrical distribution, transmission, and generation systems), SCE appreciates your notifying us of these development plans in order to assist us in determining the future electrical needs of this area.

12-3

If the project is within the projected load growth for this area, SCE is basically stating that the total system demand is expected to continue to increase annually; however, excluding any unforeseen problems, SCE's plans for new distribution resources indicate our ability to serve all customers' loads within this area are in accordance with SCE's Design Standards, rules and tariffs, and will be adequate for the next ten years.

SCE completes all work in accordance with the rules and tariffs as authorized by the CPUC and other governing entities. Any cumulative impacts related to electric service would be addressed through this process.

12-3

Please note that although SCE is currently capable of serving project loads, the project developer will be responsible for the costs of any new distribution and/or line extension work, per SCE's CPUC-approved tariff Rules 15 and/or 16, and of any relocation of facilities required to accommodate the distribution line and/or service extensions required by SCE to serve the project.

12-4

In addition, it is essential the project developer review and/or discuss with SCE what measures can be taken to assure optimal conservation measures within this project's boundaries that will contribute to the overall energy savings goals of SCE and California. As an example, SCE administers the "Savings By Design" program, a statewide nonresidential new construction and renovation/remodel energy efficiency program, funded by utilities customers through the Public Purpose Programs surcharge. The Savings By Design program offers design assistance and financial incentives to improve the energy efficiency of a project. Energy efficiency recommendations may improve the energy performance of a project beyond Title 24 (or other baseline) requirements. The program is voluntary, and developers are not under any obligation to modify construction design based on resulting recommendations. (Please note that financial incentives are available only if an agreement is completed, eligibility is established by the utility, the project meets program/performance requirements and the energy efficiency strategies are installed and verified). For further information on how to participate in the Savings By Design program, please contact Mark Davis, Technical Specialist, at (626) 633-7166.

12-5

Impacts to Existing Facilities

SCE Company right of ways are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case by case basis by SCE's Operating Department. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right of way constraints and rights. In addition, in the event the project proposes to impact SCE facilities or its land related rights, please forward five (5) sets of plans depicting SCE's facilities and associated land rights to:

12-6

Corporate Real Estate
Southern California Edison Company
300 North Pepper Avenue, Building "B"
Rialto, CA 92376

CPUC CEQA Requirements

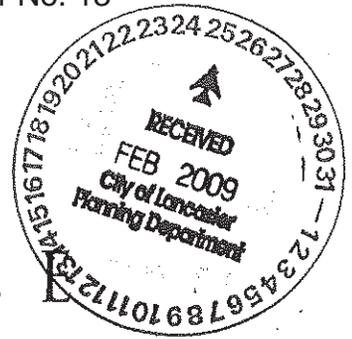
Please note if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If, those environmental consequences are identified and addressed by the local agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project, and the new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the project for up to two years or longer.

Once again, SCE appreciates the opportunity to review and respond to the DEIR for this project. If you have any questions regarding this letter, please do not hesitate to contact me at (661) 726-5608.

Sincerely,



Catherine Hart
Region Manager
Southern California Edison Company



PALMDALE

a place to call home

February 23, 2009

JAMES C. LEDFORD, JR.
Mayor

STEVEN D. HOFBAUER
Mayor Pro Tem

MIKE DISPENZA
Councilmember

TOM LACKEY
Councilmember

Ms. Jocelyn Swain
Planning Department
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

RE: Draft Program Environmental Impact Report (SCH No. 2007061012) Lane Ranch Towne Center Project

Dear Ms. Swain;

Thank you for the opportunity to comment on the above referenced document. The proposed project has the potential to impact the City of Palmdale, specifically with respect to Traffic and Circulation. Staff has reviewed the document and provides the following comments:

Section III. Environmental Setting

Table III-1 Related Projects. Item No. 76 states that 450 single family homes are proposed, recently approved, under construction or are reasonable foreseeable within the vicinity of Avenue M-8 and 60th Street West. The City of Palmdale does not have any proposed or recently approved projects in this vicinity.

Section IV. Environmental Impact Analysis

Within Section IV.O.2 (Utilities; Water), the Antelope Valley Integrated Regional Water Management Plan (IRWMP), dated 2007, is not referenced. The Quartz Hill Water District, Los Angeles County Waterworks District #40 and the City of Lancaster are stakeholders who participated in the document preparation process and have adopted this document. The analysis provided in the IRWMP was prepared subsequent to the 2005 Integrated Urban Water Management Plan for the Antelope Valley (Los Angeles County Water Works Districts, Quartz Hill Water District) and therefore, more emphasis should be placed on this.

13-1

13-2

13-3

38300 Sierra Highway

Palmdale, CA 93550-4798

Tel: 661/267-5100

Fax: 661/267-5122

TDD: 661/267-5167

Auxiliary aids provided for

communication accessibility

upon 72 hours' notice and request.

The IRWMP shows that insufficient water supplies will be available to meet the demands of the Antelope Valley through 2035. Therefore, the cumulative impact of this project on water supply cannot be less than significant even if water supply can be verified at the current time.

13-3

Section IV.N. (Transportation and Traffic) notes that the trips generated by Lane Ranch Towne Center Project will impact the intersection of 60th Street West with Avenue M (Columbia Way) with a Level of Service F. The City believes that the appropriate mitigation measure for this significant impact is for the project to construct a traffic signal at the intersection rather than paying a traffic fee/fair share contribution.

13-4

On Page IV.N-39, modification of Items N-14 and N-15 is needed. Item N-14 states "The intersection warrants a traffic signal in future conditions without and with the project. The project applicant shall provide a fair share contribution towards this improvement". This statement is misleading as the ICU/delays for this intersection for the "Future without a Project" are (AM/PM/SAT)(136.49/272.53/248.71), while the ICU/delays for the "Future with the Project" are (AM/PM/SAT) (220/421/481). This is a 61% (AM), 54%(PM) and a 93% (SAT) increase in delay within the same LOS F. Therefore; it is necessary to provide the LOS calculation, which will include the roadway improvements, necessary to mitigate the LOS for this intersection with the installation of a traffic signal. For Item N-15, indicate the roadway improvements necessary to mitigate the LOS with the installation of a traffic signal.

13-5

Additionally, for clarification purposes, provide additional information to clearly show which condition (signalized or 4-way stop controls) were the LOS calculated on Table IV.N-13, Item No.9, LOS A (AM), C (PM), D (SAT) under the "Future with Project Mitigation" column.

13-6

Letter to Ms. Swain
Lane Ranch Towne Center Project Draft EIR
February 23, 2009
Page 3

Should you require any additional information, please contact
Susan Koleda or me at 661/267-5200.

Sincerely

A handwritten signature in black ink, appearing to read "Asoka Herath". The signature is fluid and cursive, with the first name being more prominent.

Asoka Herath
Director of Planning

AH:sk

cc: Bill Padilla



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

February 24, 2009

Jocelyn Swain
City of Lancaster
44933 N. Fern Avenue
Lancaster, CA 93534

Subject: Lane Ranch Towne Center
SCH#: 2007061012

Dear Jocelyn Swain:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 23, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse



14-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007061012
Project Title Lane Ranch Towne Center
Lead Agency Lancaster, City of

Type EIR Draft EIR

Description The proposed project consists of a 407,000 square foot commercial development located on approximately 35 acres at the southeast corner of 60th Street West and Avenue L. As part of the proposed project, a General Plan Amendment (GPA 06-03) and a Zone Change (ZC 06-03) would be required in order to change the general plan designation from a mix of Commercial (C) and Office Professional (OP) to C and the zoning from a combination of commercial planned development (CPD) and OP to CPD. A Conditional Use Permit (CUP 06-03) would also be required for the proposed project. The commercial development would include two anchors, one with a garden center, for a total of 284,341 square feet, a 14,820 square foot drug store, three submajor stores totaling 35,000 square feet, 4 buildings with "shops" totaling 28,000 square feet, and two restaurants (both fast food and sit-down) totaling 10,300 square feet. Some parking would be provided on a 100 feet wide strip of property designated as R-7,000 in accordance with existing zoning code regulations. A total of 1,960 parking spaces are anticipated to be provided and access to the site would occur from Avenue L and 60th Street West.

Lead Agency Contact

Name Jocelyn Swain
Agency City of Lancaster
Phone (661) 723-6249 **Fax** (661) 723-5926
email jswain@cityoflancaster.org
Address 44933 N. Fern Avenue
City Lancaster **State** CA **Zip** 93534

Project Location

County Los Angeles
City Lancaster
Region
Lat / Long
Cross Streets 60th Street West and Avenue L
Parcel No. 3102-027-034, 35
Township 7N **Range** 13W **Section** 27,35 **Base** SBBM

Proximity to:

Highways
Airports
Railways
Waterways
Schools Quartz Hill HS
Land Use Z: Commercial Planned Development and OP
GP: Commercla (C) and Office Professional (OP)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Solid Waste; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Native American Heritage Commission

Document Details Report
State Clearinghouse Data Base

Date Received 01/09/2009 *Start of Review* 01/09/2009 *End of Review* 02/23/2009



JANUARY 9, 2009

KATHRYN OWEN
43269 41ST ST W
LANCASTER CA 93536

CITY OF LANCASTER
PLANNING DEPARTMENT
44933 FERN AVENUE
LANCASTER CA 93534

re: Lane Ranch Towne Center

To Whom It May Concern

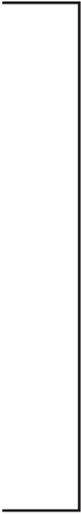
Being a resident on the West side of Lancaster I do not wish to see any further development of large, big box stores (Target, Walmart, strip malls, etc. Living between Avenue K and L on 41st Street West I have access to a Target and a Wal-Mart just a few minutes from my home. Wal-Mart on Valley Central Drive is but 4 miles from my home and Target is just 3 miles.

The majority of tax paying, property owning residents in this area have asked to not have these stores built. They will not only decrease property values but cause a traffic nightmare and bring in certain ethnic groups that will cause destruction to the area in the form of crime including vandalism, robbery and graffiti.

We have spoke and we do not need another Wal-Mart or Target. If I want to live closer to this blight I will move closer to it.

Sincerely,

Thom Owen
661 943-8063



15-1

Swain, Jocelyn

From: Windsor Taunton [wptaunton@antelecom.net]
Sent: Monday, January 12, 2009 10:02 PM
To: Swain, Jocelyn
Subject: Coments of QH, WalMart and Target

My Wife and I are both NOT in favor of building a new Wal Mart and Target in Quartz Hill.
Lets leave what Country flavor is left as it has been for years.
The Wal Mart in Lancaster is not that far away and putting stores like this by a High School will make
for too much traffic and make Ave. L and 60th West very congested many hours during the day.

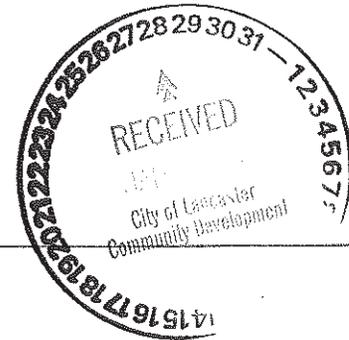
16-1

Thank you,
Windsor and Pat Taunton
6353 Elizabeth Lake Road
Leona Valley, CA 93551
270-1638



Swain, Jocelyn

From: Reyes, Joy
Sent: Wednesday, January 28, 2009 10:51 AM
To: Ludicke, Brian; Swain, Jocelyn
Subject: FW: 60TH AND L



Please see below for your information. Thanks.

From: PAUL HARRIS [mailto:pablo116@verizon.net]
Sent: Wednesday, January 28, 2009 10:43 AM
To: Parris, R Rex
Cc: Reyes, Joy; smarquez@cityoflancaster.org; mbozigan@cityoflancasterca.org
Subject: 60TH AND L

Dear Mayor Parris, Vice Mayor Smith, City Manager and Council members:

I am contacting you and urging you to take a strong view and specifically to stop the development, and developers...in allowing the creation of these 2 separate Super centers

I understand the city needs money to stop the war on crime..and gangs..very important..But not as big as a priority in relation to those homeowners and individuals WHO must now stand up..and say NO and STOP to these proposed developments. **Slow down the growth!**

We are your constituents, represent us first.. and hear us fairly in regards to this!

You advocate a all out war on crime... I support your efforts strongly, but think of all the negative that will happen out here...30,000 cars a day at the intersection, young adults in danger due to the congestion, a major change in the ruarl community, what Walmart really brings..we have enough Walmarts in the AV to service the folks from Cal City let alone Victorville. Crime, congestion, alcohol,water shortages are just a few of the negatives. You think we have enough crime now...just wait and see what the future brings..we can have T-SHIRTS printed up saying "GOT CRIME" on one side.. and on the other.. You get the idea.

As a professional negotiator, Mr. Mayor-- and with a thought to the valleys history...here is a idea for the Lane Ranch Town Center/Commons at Quartz Hill that perhaps you could use to help all regarding both of these super centers. Put the Walmart up by the prison area and let it be away from our schools..cut the congestion problem. Buy back the land from Walmart and offer the land up by the prison and renegotiate ALL.

We pride ourselves in aerospace and agriculture in the AV...Why not have this parcel of land offered by the Monte Vista Co be acquired by the AV school district as a state of the art Agriculture center for future learning. This would allow students preparing for future's in this field a great head start..keep the area the way it should be(rural) and this could be done as follows: **Put up bonds for the buying of this land, so Monte Vista can make their profit...and a rich history of AGRICULTURE AND FARMING and new techniques could be taught. Put a tunnel connecting QHHS and Lane Ranch under 60th ST WEST so their is safe passage.**

By the way...what is the position of the Antelope Valley HS District on all of these proposed super centers?? I have yet to hear one official comment..I have heard that they are promised a new Parking lot? Another parking lot???

17-5

A Walmart next to QHHS, just does not MAKE SENSE no matter how someone try's to justify it for getting revenues for the city of Lancaster. Since Lancaster bought this land and sold..you must take full responsibility of this issue, and rectify all for your constituents beliefs! I have attached a copy of the editorial I wrote to the AV Press recently regarding this whole scenario.

17-6

I have looked at the EIR and traffic report and will continue to review this Long and detailed report...This changes everything to this area. Doctors, nurses, firefighters, law enforcement, teachers, businessmen, working citizens.. parents and loved ones--call this area home..ONCE you allow this,,,,it will all be lost forever! Please take action Now.

I look forward to your written response's.
Sincerely,
Paul Harris

OPINION

Just read the opinion of the local lady from Lancaster stating that the city needs to be business friendly to "BIG BOX" business, Walmart, again...and what the benefits are especially in these "crunching times" for city sales tax revenue, and as a way for producing local jobs.

Sorry... but this is short term thinking and logic!
A few questions need to be answered by her:

1. How close do you personally live to this proposed location?
2. Have you seen the proposed drawings of this Super center?
3. Have you really thought about the "real" benefits of having another Walmart in Lancaster?
4. Do you realize that this location is next to a California Distinguished School-Quartz Hill High School? Do you remember the recent Columbine scare at this school? I sure do, instead of students being taught, that day they all "feared" for their lives.

17-7

Here's the "REAL" Benefits" Of Having Another BIG BOX Walmart in long term thinking:

Traffic, crime, end of the "rural" atmosphere for which we decided to call this area "home"-lost, FOREVER...Lowering of property values...that having a Walmart in the neighborhood brings: accidents, alcohol sales, sales of ammunition-bullets, congestion and most importantly--what brought most of the neighbors out this way-peace and just a great place to live.

17-8

Just check some of the popular Walmart websites from disgruntled employees and how Walmart treated them, and what other cities experienced when the "big box" came in.

17-9

WE protested and marched before, and we will again if needed, we have not forgotten.. as concerned citizens and members of "Quartz Hill Cares"--we again say-STOP THE MADNESS

17-10

Mayor Parris Come take a "walk" with us out here and hear the "REAL" story from the citizens who live here...and then show the integrity... in finally stopping this development.

We came to the City Council and aired our concerns previously. Protect the people you serve, by protecting the citizens interests FIRST..Before the interests of "BIG BOX" business and the needed city tax revenue dollars, be creative as you are, and think of other venues to raise the needed revenues, other than using "big box" development's and developer's.

↑
17-10

We have Walmarts in the "Valley" we surely don't need one in this location.

17-11

We as citizens have been paying taxes our for a few year's out here in Lancaster, now it's time to protect the Long Term Benefits of tax paying citizens..instead of using short term "band-aid" thinking.

17-12

Paul Harris
Lancaster

Swain, Jocelyn

From: Crosby, Terry
Sent: Monday, February 02, 2009 1:22 PM
To: Ludicke, Brian; Swain, Jocelyn
Subject: FW: quartz hill superstores

Terry Crosby
City of Lancaster
tcrosby@cityoflancasterca.org
661-723-6007



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

From: Tainatongo, Kelvin
Sent: Monday, February 02, 2009 12:27 PM
To: Crosby, Terry
Subject: RE: quartz hill superstores

Terry,

Anything related to the projects at 60th & Ave L are to be forwarded to Brian Ludicke and Jocelyn Swain. Please forward this email to them and let the citizen know that their comments have been forwarded to the appropriate Department.

Kelvin

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

From: Crosby, Terry
Sent: Mon 02/02/2009 08:41 AM
To: Tainatongo, Kelvin
Subject: FW: quartz hill superstores

FYI..see message below received by Mayor. Who do you want to respond?

Terry Crosby

City of Lancaster

tcrosby@cityoflancasterca.org

661-723-6007

From: kathrine [mailto:toogoophey@verizon.net]
Sent: Friday, January 30, 2009 10:27 AM
To: Parris, R Rex; Crosby, Terry
Subject: quartz hill superstores

as a resident of quartz hill, i am against the building of superstores at 60th st w and avenue l for many reasons. with so many new superstores in the antelope valley, can you legitimately answer me why lancaster is pushing for this to be built in quartz hill, when a super walmart and target are less than nine miles and 15 minutes away? i would also like to know when your meetings will be addressing this issue.

18-1

thank you,

kathrine

toogophey@verizon.net



January 31, 2009

Lancaster City Hall & Planning
44933 N. Fern Avenue
Lancaster, Ca 93536

To Whom It May Concern,

I have been following the rezoning of Quartz Hill, at Ave. L and 60th West, for some time. I agree with Ms. Loretta Berry in Saturday's news story. We don't need another Wal-Mart in our valley. As Quartz Hill residents for some 31 years, my husband and I agree that our area doesn't need more stores for convenience sake.

I have shopped in Lancaster and Palmdale for all these years, and don't mind driving one or two more miles to shop. Having stores and restaurants near a High School is not a very good idea. Having worked in the educational field for 21 years, I can testify that locating such businesses near a school is very problematic.

19-1

As of a year ago, there were 3 schools on the corner of K-2 and Challenger Way. The students were always sneaking out to visit the convenience store, donut shop, etc. Security always had to be on top of the matter. With such big budget cuts, that could be even more difficult.

The residents of the area don't seem to have any opinion in this matter. Wal-Mart wants profit. They have been known to close after running everyone out of business in the area. Last week I was at the new location of Michaels in Lancaster. In the parking lot, which is adjacent to Wal-Mart, I was approached by a pan handler begging for money. That never happened when I shopped across the street at the old location. My friend was robbed in front of the Lancaster Wal-Mart. Her purse was ripped from her arm while she was pushing her grocery cart. Will there be protection for the consumers while they shop?

19-2

Why does the community of Quartz Hill have to disappear for more tax base? We have so many empty houses sitting here waiting for more section 8. How sad this area is becoming. Please listen to the community for a change.

19-3

Respectfully,

Jane Donckels
Quartz Hill, CA 93536-5021

[Faint, illegible text]

[Faint, illegible text]

Corda Gallaway
42342 Seville Circle
Lancaster, California 93536

January 31, 2009

Attn: Jocelyn Swain, Assistant Planner – Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, California 93534



Re: Proposed Developments at 60th West and L

Dear Ms. Swain;

I am writing to oppose the Wal-Mart/Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for the sale directly in from of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have and love.

20-1

In 1990 we made a conscience decision to move to this rural area so we could enjoy the peace, beauty and quiet of the desert. We looked at the building plans before making our residential choice based on the surrounding properties being residential. Now, due to the ***greed*** of our City Council members and developers we are threatened with yet another Super Wal-Mart/Super Target etc., and the destruction of our beloved town. How many big box stores does the Antelope Valley need??

20-2

The citizens of Lancaster voted the City Council into office to speak on our behalf, ***why will you not listen to your people! We do not want commercial developments in our residential community!***

Sincerely,

Corda Gallaway
Lancaster, California

cc: Mayor R. Rex Parris; Vice Mayor Ed Sileo; Council Member Kenneth G. Mann;
Council Member Ronald D. Smith; Council Member Sherry Marques; Michael D.
Antonovich Supervisor, Fifth District

Richard Gallaway
42342 Seville Circle
Lancaster, California 93536

January 31, 2009

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Lancaster City Hall
44933 North Fern Avenue
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21-1

In 1990 we made a conscience decision to move to this rural area so we could enjoy the peace, beauty and quiet of the desert. We looked at the building plans before making our residential choice based on the surrounding properties being residential. Now, due to the ***greed*** of our City Council members and developers we are threatened with yet another Super Wal-Mart/Super Target etc., and the destruction of our beloved town. How many big box stores does the Antelope Valley need??

21-2

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Sincerely,

Richard Gallaway
Lancaster, California

cc: Mayor R. Rex Parris; Vice Mayor Ed Sileo; Council Member Kenneth G. Mann;
Council Member Ronald D. Smith; Council Member Sherry Marques; Michael D.
Antonovich Supervisor, Fifth District

Swain, Jocelyn

From: Reyes, Joy
Sent: Monday, February 02, 2009 9:32 AM
To: Swain, Jocelyn
Subject: FW: EIR REPORT 60TH AND L

Jocelyn, another email from Paul Harris received today with additional comments below but same attachment as previously sent. Thanks.

From: PAUL HARRIS [mailto:pablo116@verizon.net]
Sent: Monday, February 02, 2009 9:06 AM
To: Planning Commission
Subject: EIR REPORT 60TH AND L

Attached, please find my concerns regarding this development. PLEASE push for no for rezoning of this area--toO commercilization. There are many serious conerns for citizens whjo bought here for residential purposesONLY...Not to have the bottom fall out under the umbrella of tax revenues for the city of Lancaster...and ask for new Zoning changes. I have sent my thoughts on the EIR Draft...and not heard ONE response back from Mayor, vice mayor, council and to individual planning memebbers. THERE ARE JUST TO MANY NEGATIVE FACTORS, NON- BENEFITS THAT POINT TO NOT MAKING THIS DEVELOPMENT attractive.

22-1

I look forward to your written response to this Draft EIR and comments to my concerns.

Regards,
Paul Harris





January 29 2009

To Lancaster Planning Commission, Via COPY TO-- Jocelyn Swain

RE: Draft EIR for Quartz Hill Commons/Lane Ranch Town Center

From: Paul Harris/Lancaster, CA.

Some major concerns regarding the Draft EIR:

1. Delineation of market- Proposes over 840,000 sq ft of new retail space WHICH is WELL BEYOND the normal range of 400,00 sq ft for a Double Shopping centers? Is this not a overkill for the proposed super centers in this area?

22-2

2. The CANNABILIZATION by anchor tenants who will becoming to these Super centers—Wal-Mart, Lowe's. Target-This DRAFT clearly states that they have taken this into account...thus it will eliminate sales at existing store locations in the proximity—URBAN BLIGHT

22-3

3. Correction-THE Draft EIR states under the project description: Situated within the community of Quartz Hill—This is not TRUE—This is Lancaster, CA.

22-4

OTHER MAJOR CONCERNS:

According to Draft EIR It WILL NOT BURDEN existing capacity of water?? Are we not under a water rationing for citizens of Lancaster. How can this be stated!

22-5

LONG TERM EFFECTS;

May impact physical, aesthetic and human environment—THIS PROJECT DEFINITELY affects all 3 categories-PHYSICAL Will no longer have the VIEWS within this area

22-6

Incremental degradation of local and regional air Quality(IRREVERSIABLE)---ALL OF THIS for a ESTIMATED \$1.2MM in tax revenues for the City of Lancaster. What about the long term effects of this? Air quality is why so many call Lancaster home!

22-7

DRAFT EIR also states a increase traffic volume, noise—We will have to live with this forever---What price justifies such a altering of our environment for tax base revenues from Super center Commons at Quartz Hill

22-8

Irreversible soil erosion, increased population growth

22-9

Based on these DRAFT EIR---I ask ALL-Planning Commission Members, Mayor, Vice Mayor, City Manager, and Council Members to REJECT THE NEED FOR

22-10

ZONE CHANGE IN THE GENERAL PLAN AMENDMENT. ADD TO THIS LANE RANCH ANNUAL ESTIMATED 2012 TAX REVENUE OF \$643,000.00 Sales and property tax—DOUBLE THE ABOVE STATED OJECTIONS AS THEY ARE TOO CLOSE TO EACH OTHER.

In the end—WITH THE VAST AMOUNT OF LAND- PROXIMITY TO QHHS, TRAFFIC NOISE, BLIGHT, CRIME,AIR POLLUTION, WEAPONS, ALCOHOL, EXISTING BUSINESS'S CLOSING-DECLINE disappearance of RURAL ATMOSPHERE SAFETY AND HEALTH OF SCHOOL KIDS And 24/7 operation.....I STRONGLY URGE THAT YOU REJECT THE REQUEST FOR ZONE CHANGE FROM RESIDENTIAL AND OFFICE PROFESSIONAL TO COMMERICAL.

22-11

As a 12 year resident of the city of Lancaster, with a total of 21 years living in the Antelope Valley...I chose to buy my residence specifically for the RESIDENTIAL-- non commercial zoning of this area that I reside in. To many negative factors affect the everyday living conditions as stated from the this DRAFT EIR for the Super-Centers Location at 60th ST West and Avenue L.

22-12

Thank you.

Signed,
PAUL HARRIS
6234 W. AVE L-6 LANCASTER, CA. 93536
Concerned Homeowner/Citizen

Safety Manager Seismic Healthcare Bracing Construction
OSHA 500 Facilitator

Swain, Jocelyn

From: Karen.H.Lee@kp.org
Sent: Friday, January 30, 2009 10:53 AM
To: Swain, Jocelyn
Subject: Concerned Citizen

Dear Ms. Swain,

I would greatly appreciate you adding me to the mailing list for future hearings for the proposed development of Walmart & Target in Quartz Hill.

I had emailed you before but have not received any mailing thus far.

23-1

I am those of many who are greatly distressed about this proposed development. Both my husband & I work in Lancaster & moved to Quartz Hill from Palmdale due to the quiet, rural atmosphere that Quartz Hill area had to offer. Most of those that live around the 60th & L area had the same purpose in mind.

I can't comprehend how the city of Lancaster might think this development is a good idea for our neighborhood especially considering that a High School & it's kids will be greatly impacted. I am sure you are aware of all the other concerns (ie traffic, possible increase in crime)

23-2

I know jobs are needed & Walmart sponsors a great deal of events for Lancaster. However, I hope & still believe that Lancaster has it citizens & it's **long term** community impact as it's primary concern. I hope the city will be known for it's imagination & for it's partnership with the citizens whether then for the area that has a Walmart in every corner of its city. Thank you for your time & for all that you do for our great city.

23-3

Karen Lee
42631 Biscay Street
Lancaster, CA 93536

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Swain, Jocelyn

From: Ardell [daneard@roadrunner.com]
Sent: Tuesday, February 03, 2009 6:34 AM
To: Swain, Jocelyn
Subject: Stop Walmart & Target Shopping Center Across from QHHS
Attachments: Walmart Letter.doc

Ms Swain,

Please see the attached letter of alarm at the prospect of still another Walmart Super Center and Target being built across from Quartz Hill High School. Please urge our council members to recognize that more revenue over the well being of our youth is not in the best interests of our community. Walmart & Target can build elsewhere if they must but not next to the high school. Further, please express to them our concern over the continued erosion of the individual/small business person who truly builds the local community. Big corporations and Walmart in particular do not care a jot for the community or their impact on it. They just care about the bottom line. They remove the soul of the community. We have more than enough of them already in this Valley already. Let's keep what little sense of community we have and support our youth and independent business owners.

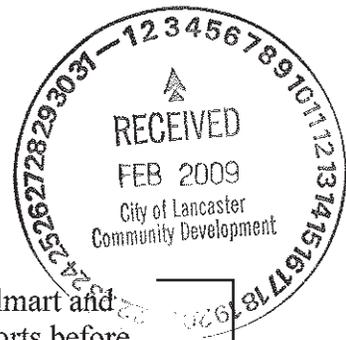
24-1

Sincerely,
Ardell Dane
Quartz Hill resident



26 Jan 09

Dear Ms. Swain,



I received the environmental impact disc on the building of yet more Super Walmart and Super Target centers across from Quartz Hill High School. I had hoped our efforts before had had some impact but I was wrong. Again, I am appalled that Planning Commission would even consider allowing those to go in across from a high school. Not only that, what on earth do we need more of them for? Is the Commission trying to put every independent business person out of business?

24-2

It appears the tax revenue overrides quality of life, our children's welfare, or our community. Walmart is known for putting independent business people out of work. You could argue that if they're any good they'd stay in business. I would agree if you didn't continue to glut the Lancaster/Palmdale area with Super Walmarts and Super Targets. By putting in these cookie cutter mega stores that offer nothing new and only part-time work, the Commission continues to destroy anything that makes the valley unique or an attractive place to live.

24-3

Further, putting these centers across from a high school puts our children at risk. Walmart sells firearms and/or ammunition and weapons (kitchen knives count). Why would anyone put that availability across from a school during times when tragic mishaps are not uncommon? So often they show that when people do not have access to a weapon and are forced to wait and cool down, crimes of passion are avoided.

24-4

Further, Walmart allows folks to park their RVs in their parking lots. An RV by a high school is a perfect set up for perversion be it pedophiles, pimps or drug dealers.

24-5

WHAT ARE THEY THINKING???. Have the elected officials on the commission no respect for the community or for our children? Has the almighty tax revenue blinded them to doing what is right and good for the community? I thought they were elected to protect and promote us not undermine us.

24-6

If they decide they don't care about the folks who built this valley, the independent business owners and the families who moved to Quartz Hill for a better, less crime ridden lifestyle, then they can at least move the project to Ave K or J. There are plenty of people there and it is more a part of Lancaster. I'm sure Walmart and Target can afford to make the change. They don't care about the communities they come into. That has been obvious since their inception. But we in the community care. Leave Quartz Hill alone and put your revenue attractions closer to Lancaster. It will be a win/win. What is currently planned is not a win for the children and families of Quartz Hill and therefore not for the community at large.

24-7

Sincerely,
Ardell Dane

February 1, 2009
42044 Ringstem AVE.
apt. A
Lancaster CA 93536

Jocelyn Swain,

The Quartz Hill area does not need a Wal-mart or a Target store.

There are 4 Wal-mart stores in our valley - that is sufficient.

Here are some of the reasons why we do not need super stores here:-

Too much added traffic

Not enough water

No need for these stores in Quartz Hill - also this would be the wrong area

Wal-mart does not keep their parking lots clean - nor do they keep the area around their store clean, too close to schools.

Please - we do not want these big stores here to ruin our area.

- Jean Philley
A Quartz Hill Resident
for 24 years.





Dear Joelyn:

Please NO WARMART
on the corner of
60th St, West and
Avenue L.

We dont need it,
theres too much
traffic already and
with the school so
close its dangerous.

Try 65th St West
& Ave M. instead.

Francys Stenton

26-1

1/30/09

Planning Dept.
City of Lancaster
44933 N. Fern Ave.
Lancaster, CA 93535



Re: NO - on rezoning Quartz Hill

Dear Sir/Madam,

Please stop re-zoning Quartz Hill and do not develop any Super Center stores in this area.

I've lived in the AV for 24 years and have slowly watched Quartz Hill "disappear" because of re-zoning. Our rural lifestyle is very important and needs to be protected for future generations.

Thank you for your attention in this matter.

Jarvis Sullivan

27-1

Swain, Jocelyn

From: Donna Wolfe [dowolfe@ph.lacounty.gov]
Sent: Tuesday, February 03, 2009 9:01 AM
To: Swain, Jocelyn
Subject: [POSSIBLE SPAM] Letter in opposition to Wal-mart at 60th West and Avenue L

Importance: Low

Donna L. Wolfe
 41932 60th Street West
 Quartz Hill, CA 93536

February 3, 2008

City of Lancaster
 Planning Department



Dear Lancaster Planning Commission;

It has come to my attention that a proposed commercial area is to be built at the intersection of 60th Street West and Avenue L. The proposed area is adjacent to Quartz Hill High School.

There are many reasons I personally object to the building of such a center in that particular area. Among them traffic congestion, crime and destroying of an area of town that prefers to remain somewhat rural.

28-1

These points undoubtedly are difficult to deny and I'm sure you have heard the arguments many times. Although I stand firm with the argument that this is, for reasons mentioned above, an unfit area for a commercial zone I would like the Planning Commission to address the following concerns:

1. The congestion of fast food outlets next to schools is a persuading factor in childhood obesity. Now why would anyone want to support a zone change that would promote something so scientifically proven to destroy our population? Please refer to the following articles.

28-2

2. The other issue is the particulate matter that is dispersed in the air due to traffic pollution especially with large diesel trucks. It is not only the vehicular pollutants but also keep in mind the amount of road debris left from road traffic. This debris is made airborne by the extensive traffic in the area. Now imagine your child is playing football, baseball, dance team or anyone of the outdoor activities on a high school campus, do you want them exposed to air that could potentially damage their lung or in some cases take their life? As citizens of a community it is our job to protect the health and welfare of the community we live in. It is far better to not pose a potential problem than to create it and try and rectify it later. Please refer to the following articles.

28-3

These are hard questions to answer but I believe they need to be addressed by individuals who are professionals in the health care community.

The case of childhood obesity in the US is no less alarming, and according to childhood obesity facts for this country, there has been more than a doubling of obesity in preschool children as well as in adolescents aged between twelve and nineteen years of age. In the case of children aged between six and eleven years, this figure has tripled and it is believed

that, at present, there are as many as nine million children aged six or above that are obese.

Other childhood obesity facts show that almost sixty percent of obese children aged between five and ten years have a minimum of one cardiovascular disease risk factor, and twenty-five percent had two or more risk cardiovascular disease risk factors. Also, childhood obesity facts point us in the direction that, for children born in the US in 2000, the lifetime risk of being diagnosed with type II diabetes is around thirty percent for boys and forty percent for girls, and this figure rises in the case of ethnic minority groups. Not a very rosy picture!

Information available through The Health Care Center at www.thehealthcarecenter.com.

Density of Fast Food Joints Affects Obesity Rates Posted by Adam Kuban, January 14, 2008 at 6:30 PM File under newsflash: University of Pennsylvania researchers have found that counties with a higher concentration of fast food joints also have higher obesity rates:

"We found that there was an association between the amount of full-service restaurants (with waiters) in the county one lives in and a lower risk of obesity," said Neil Mehta of the University of Pennsylvania.

"Conversely, we found that the increase in the number and the amount of fast food restaurants was associated with an increase in obesity," he added in an interview."

Density of fast food restaurants may up obesity levels Patricia Reaney, Reuters NEW YORK (Reuters Life!) - If you're worried about an expanding waistline where you eat may be just as important as how much, according to a new study.

American researchers have found evidence to support the notion that fast food restaurants could be a contributing factor to the rising levels of obesity in the United States.

In a study that looked at the availability of restaurants, rather than what people ate, they discovered that eating out can have both a positive and negative impact on obesity, depending on the type of restaurant.

"We found that there was an association between the amount of full-service restaurants (with waiters) in the county one lives in and a lower risk of obesity," said Neil Mehta of the University of Pennsylvania.

"Conversely, we found that the increase in the number and the amount of fast food restaurants was associated with an increase in obesity," he added in an interview.

Mehta and Virginia Chang, of the University of Pennsylvania School of Medicine, used data from an annual telephone health survey and information from the 2002 U.S. Economic Census to examine the impact of the type and availability of restaurants on the weight of people who lived near them in 544 counties in the United States.

FACTBOX: Obesity is top health concern in U.S.

Thu Jan 22, 2009 6:05am IST

(Reuters) - The following are facts about obesity in the United States.

- * About two-thirds of adults in the United States are considered overweight or obese.
- * Obesity has increased dramatically over the past two decades.
- * In 2007, only one state, Colorado, had a prevalence of obesity less than 20 percent. Thirty states had a prevalence equal to or greater than 25 percent; three of these states -- Mississippi, Alabama and Tennessee -- had a prevalence of obesity equal to or greater than 30 percent.
- * An adult who has a Body Mass Index (BMI) of 25.0 to 29.9 is considered overweight. An adult with a BMI of 30 or above is considered obese. A BMI over 40 is defined as morbidly obese.
- * About 9 million adult Americans are defined as morbidly obese, according to the American Obesity Association. The morbidly obese population is growing at the fastest rate.
- * Obesity-related diseases include coronary heart disease, Type 2 diabetes, some cancers (endometrial, breast, and colon), hypertension, dyslipidemia, stroke, liver disease, gallbladder disease, sleep apnea, respiratory problems, osteoarthritis, and gynecological problems, including infertility.

* Obesity is associated with more than 100,000 deaths each year in the United States.
* The direct and indirect costs of being overweight or obese is \$117 billion per year, according to a 2000 report by the Office of the U.S. Surgeon General.

(Compiled by Debra Sherman in Chicago; Editing by Eddie Evans) © Thomson Reuters 2009 All rights reserved
Obese Children More Prone To Asthma ScienceDaily (Jan. 18, 2001) – Fat children are at greater risk of asthma than children of normal weight, finds a study published in Thorax. Researchers at King's College London, investigated a representative sample of almost 10,000 children between the ages of 4 and 11 in Scotland and England, and in addition included more than 5000 children from 20 English inner city areas. The data were collected in 1993 and 1994. Asthma and wheezing were significantly associated with weight, with the heaviest children the most likely to have these symptoms.

Children Living Near Major Roads At Higher Asthma Risk ScienceDaily (May 23, 2005) – SAN DIEGO --Children living close to a major road are significantly more likely to have asthma than children who live farther away, according to a study presented today at the American Thoracic Society International Conference on May 23. The study found that children living within 75 meters (about 82 yards) of a major road had an almost 50 percent greater risk of having had asthma symptoms in the past year than were children who lived more than 300 meters (about 328 yards) away.

"These findings are consistent with an emerging body of evidence that local traffic around homes and schools may be causing an increase in asthma," said lead author Rob McConnell, M.D., associate professor of preventive medicine at the Keck School of Medicine of the University of Southern California. "This is a potentially important public health problem because there are many children who live near major roads."

The study included more than 5,000 5- and 6-year-old children living in Southern California, who were part of the Children's Health Study. The researchers determined how far each participating child lived from a major road: a freeway, large highway or a feeder road to a highway or freeway.

"The next step will be to verify these results with actual measurements of pollution around the homes near and distant from major roads, and to see if children who live in areas with heavy traffic develop asthma as we follow them," McConnell said.

McConnell noted that California has passed a law that prohibits building any new school within 500 feet of a freeway or busy highway.

"If we establish that children's asthma is linked with heavy traffic, then it's likely to be a long-term and expensive proposition to begin to design cities to separate transportation corridors from where children live, go to school, and engage in outdoor exercise," he said.

###

The Children's Health Study is supported by the National Institute of Environmental Health Sciences, the Environmental Protection Agency, the California Air Resources Board, the National Heart, Lung and Blood Institute, and the Hastings Foundation.

Heavy Traffic Makes Breathing A Burden In Children ScienceDaily (Dec. 17, 2007) – Exposure to traffic pollution may increase respiratory problems and reduce lung volumes in children with asthma, according to researchers who studied the effects of road and traffic density on children's lung function and respiratory symptoms in the border town of Ciudad Juarez in Mexico.

"Our results show that close proximity to vehicular traffic-related emissions, either at home or at school, can lead to chronic effects in the respiratory health of children with asthma," said Fernando Holguin, M.D., M.P.H., assistant professor of pulmonary medicine at Emory University School of Medicine, and lead author of the study, which appeared in the second issue for December of the American Journal of Respiratory and Critical Care Medicine. Traffic-related pollutants are known to be associated with asthma severity, but to what extent they affect airway inflammation and lung volume in both asthmatic and nonasthmatic

children was unknown. "Major cities along the northern and southern US borders often have high levels of vehicular traffic flows, especially at the border crossing points. Vehicular traffic emissions from the high density of border crossing traffic may be negatively affecting the health of populations who live in nearby areas," said Dr. Holguin. To investigate how specific traffic-related pollutants affected children's lung function and respiratory symptoms, the researchers recruited 200 age- and sex-matched asthmatic and non-asthmatic schoolchildren from ages six to 12. Over the course of a year, they measured road and traffic density and traffic-associated pollutants near the children's homes and schools, and evaluated each child's lung function and respiratory symptoms consecutively for four months.

Asthmatic children, but not children without asthma, were affected by living in homes in areas with high road density. They had higher levels of exhaled NO, as well as reductions in both lung volume and airflow.

Living within 50 meters of high density road areas increased the chances of respiratory symptoms in asthmatic children by more than 50 percent.

"These results may have implications for asthmatic children residing in these conditions--especially among those who may not be adequately controlled with medications--for they may be more susceptible to vehicular emissions," said Dr. Holguin.

While increased traffic and road density near schools also indicated respiratory effects in both asthmatic and nonasthmatic children, the data did not attain statistical significance in this study. Nonetheless, Dr. Holguin noted, "this finding could have significant public health policy implications because a significant proportion of schools in many countries are located in close proximity to major roads."

This is the first study of its kind to evaluate traffic-related emissions exposure in a large group of children with and without asthma over an entire year. The findings support and add to previous studies which have looked at the effects of traffic emissions on children, but it may have been underpowered to detect significant associations between respiratory outcomes and specific pollutants.

"These results are significant because they quantitatively demonstrate that closer exposure to roads lead to chronic airway inflammation and reductions in lung function," said Dr. Holguin. "This study points the way for future research to determine what preventive measures may be taken to reduce exposure and or the health effects of vehicular emissions in susceptible children."

Traffic Exhaust Can Cause Asthma, Allergies And Impaired Respiratory Function In Children
ScienceDaily (Apr. 10, 2008) – Children exposed to high levels of air pollution during their first year of life run a greater risk of developing asthma, pollen allergies, and impaired respiratory function.

However, genetic factors are also at play. These are the results of a new study conducted under the BAMSE project.

The BAMSE project has monitored 4,000 children in Stockholm county from birth in order to assess whether exposure to traffic pollution during their first year of life affects the risk of developing asthma and allergies. Levels of traffic exhaust were measured at the site of the home. The results show that the children who were exposed to high concentrations of pollutants ran a 60 per cent higher risk of suffering of persistent asthma symptoms.

Respiratory function was also adversely affected, and the children were much more likely to be allergic to airborne allergens, particularly pollen.

Conclusions

1. Children who grow up in Stockholm are at greater risk of developing asthma, respiratory problems and pollen allergies if they live in areas where there are high concentrations of traffic pollution.

The BAMSE project is run by the Stockholm County Council's unit for Occupational and Environmental Medicine and the Institute of Environmental Medicine at Karolinska Institutet.

Swain, Jocelyn

From: rod duff [rduff1@antelecom.net]
Sent: Thursday, February 05, 2009 9:32 AM
To: Swain, Jocelyn
Subject: Proposed projects on Ave.K & L

Dear J. Swain,

This letter is to protest the developments proposed for the area around Quartz Hill High School on Aves. K&L. 29-1

My objections to these projects are as follows,

1. The traffic in that area is very congested with one side of the street being 45 mph and the other side being 25 mph. Children are constantly crossing and re-crossing both Ave L and 60th St.W. Any further congestion added to that area would make that area much more hazardous. Vehicles are continuously dropping off and picking up children in that area. 29-2

2. We have several Walmarts, Targets, Lowes stores in the area. We have many empty buildings all over the area of those stores in town. The area around Win Co is crime ridden and the area around the other stores are awash with panhandlers and illegal aliens. So far Quartz Hill has been fairly free of that element. We only have so many police officers to contain the problem that this development will bring. 29-3

3. Light, noise and just general pollution will increase and make the rural setting of Quartz Hill nothing less than just another piece of urban blight. 29-4

4. This sort of development will adversely affect the small local businesses. 29-5

The city has allowed the overbuilding of homes in this area and with that overbuilding has created vast areas of ghost towns and torn up land. 29-6

I moved to Quartz Hill for its quiet, peace and hope that by stopping this unnecessary development it will stay that way!

DO NOT ALLOW THIS PROJECT TO RUIN QUARTZ HILL!!!!

Sincerely,
Roderic Duff & Cynthia Kline
7229 W. Ave. Quartz Hill, CA 93536



Swain, Jocelyn

From: Bozigian, Mark
Sent: Thursday, February 05, 2009 10:34 AM
To: Ludicke, Brian; Swain, Jocelyn
Subject: FW: Draft EIR Report-Commons at Quartz Hill/Lane Ranch Town Center
Attachments: Lancaster Planning Commission-Concerns EIR.doc; Lancaster Planning Commission-Concerns EIR.doc

Another comment for the record.

MARK



From: PAUL HARRIS [mailto:pablo116@verizon.net]
Sent: Thursday, February 05, 2009 10:12 AM
To: Bozigian, Mark; Parris, R Rex
Subject: Draft EIR Report-Commons at Quartz Hill/Lane Ranch Town Center

Mr. Bozigian,

Attached please find my concerns regarding this draft. I have copied not only the City planning commission, but also Mayor, Vice Mayor and Council in regards to these projects.

I urge you to take a step back from the thought process of needed city tax revenues and look to the future legacy that you have a Direct responsibility too....PROTECTING the interest's of Lancaster's citizens as the first priority.Those that currently reside here, have paid their individual taxes, shopped locally and moved here for what it was, and have existing business's.

30-1

Yes, I strongly support the Mayor's effort to reduce crime,,but why is it here in Lancaster...Was this not taken seriously by the prior councils action by allowing pro development in residential and business. Now WE all have this crime issue....I urge you personally NOT TO ALLOW THIS DEVELOPMENT. We have crime--most to my knowledge reported on the east side, going towards the West and attacking everything in between....Do the homework and see what 840,00 sq ft of retail space will bring..based on 24/7 operation--it destroys why we call this area home--crime, litter, smog, congestion and noise-ruralness is lost FOREVER. The DRAFT EIR needs corrections and it clearly states"air pollution is at stake." The reason we call this place home, especially in North LA county is of the air quality. Just look at those who have call this home...from Richard Nixon to John Wayne,,,,,so that they or loved family could breathe fresh air.

30-2

Remember, how did Lancaster allow the crime that flourishes in its city boundaries??...now you need tax revenues to fight it(THIS just didn't happen overnight)...WHY sacrifice this neighborhood and destroy what we have here...the reason why we call this home..so you can collect tax revenues estimated in the DRAFT EIR for QH Commons in 2012 at \$1.2 mm AND Lane Ranch in 2012 at \$634,000. IS IT REALLY WORTH IT??

30-3

A estimated \$1.9MM to sacrifice this Lancaster annexed area to all this negative factors--so you can put a band aid with more law enforcement for the crime that exists. Think of this area....as IF THIS WAS YOUR personal neighborhood,,,,,I am quite sure you would have a different perspective if it was your young children, family ready to experience this. Remember

30-4

the Columbine scare at QHHS in 2006...We were lucky then,,,that it did not happen then..however, the odds on of it happening again with these super centers increases those odds!!! Protect our schools and children first! We can survive as a community without a Walmart

30-4

You must take a proactive approach---WHO pays for our neighborhood next after we get the blight, trash, noise?? What does the Master plan call for in getting this new crime out of our neighborhood when this happens, where do you go next... once the super centers come...so you can have tax revenues to fight your nex problem-CRIME at 60th and L.

30-5

As a 12 year + resident of Lancaster, 20+ resident of the AV...Yes I lived and experienced East Palmdale after purchasing a home there, and leaving the area to escape the crime and dead end environment of 20th east and R--I ask that you respond to me personally with your thoughts, creative ideas as City Manager, and what can be done to stop these developers' and their developments before the Planning commission meeting.

30-6

Were a grass roots organization...QH Cares, we are letting the community know what it faces if such plans happen....DO NOT REZONE THIS AREA...AFTER THE FACT...I moved here for residential...NOT COMMERCIAL.

30-7

How would you like to have 24/7 noise,,,,and a receiving dock for these super centers across from your personal house and front door. There goes a homeowners value in property down the drain, under the umbrella of fighting crime?? This does not make sense.

30-8

Attached are my initial comments to this Draft--I hope you find time in your schedule to write or contact me with how you view these projects----I look forward to your response, both professionally and personally on how this can continue.

Remember, AV was built on ag and aerospace..and plenty of room for growth. Dont put another WALMART, TARGET for tax revenues. If you really need ANOTHER WALMART not only do you cannibilize existing sales at their Store in Lancaster, you eliminate existing business's. Where is the support for those of us, that paid dollars to the City of Lancaster from prior years taxes?

30-9

Put the WALMART IF YOU MUST NEXT TO THE PRISON. Im sure you will target the right niche for such a super center. Repurchase this land, and stop this developement by Walmart.

30-10

Also, How can a publicist for a relation firm working for their client Walmart, be allowed to cover under the umbrella that Walmart is concerned what the neighborhood that they develop... thinks??before going in. What a hypocrite, he says he lives in the neighborhood, which is 30 streets east of this development--BUT plans to buy when the proposed development is built...sure why not when the market value of existing homes Drops..so he can live with the BENEFITS that Walmart brings as he so profoundly states in the local papers!

30-11

You may reach me via cell if you wish to discuss. I look forward to hearing back from you.

Sincerely,
Paul Harris
6234 W. AVE L-6

Lancaster, CA

OSHA 500 Facilitator
Safety Director Healthcare Seismic Retrofitting

Cell 661 361-9008

Swain, Jocelyn



From: Alane Alden [nursemom50@gmail.com]
Sent: Thursday, February 05, 2009 7:08 PM
To: Swain, Jocelyn
Subject: Westside Supercenters

February 5, 2009

Dear Jocelyn,

I am writing to voice my concerns over the cities proposal to rezone the area of Ave. L and 60 th street West to Commercial.

I have several concerns.

1. I purchased my home 12 years ago on Ave. M and 75 th West with the understanding that the property around this area was zoned for housing. Does the city plan on buying out the homeowners that are unhappy with rezoning to include commercial sites? 31-1

I left Palmdale for Lancaster because Palmdale did not listen to the homeowners. The city did what they wanted and is now overcrowded with commercial sites and crime.

2. There is a reason why homeowners live out this far west. We do not mind driving for conveniences. We prefer not to have our property values depreciated with a super center. We have a Wal-Mart on the Eastside and we already have one on the Westside. 31-2

If you look at the element that Wal-Mart brings I feel that you would agree that it certainly does not belong anywhere near a school.

Wal-Mart parking lots are full of baskets. The baskets might lock in place in the lot and that is exactly where they stay. Most of the time there are so many carts you are afraid to park a car for fear of damage. Also, Wal-Mart allows RV's to stay overnight with permission. What an eyesore. Try walking in a Wal-Mart. You can not even see the front door with the amount of solicitors and panhandlers that this store brings and allows to loiter outside the building. The store is unkept and encourages beggars with their lax policies on panhandling. This alone brings a bad element for the neighborhood let alone across from a school. 31-3

3. The traffic on Ave. L due to the High School is bad enough. I can only imagine what a super center would bring to the already traffic issues that are on Ave. L. 31-4

4. At this time crime on the Westside is lower than the rest of the city. Bringing in a super center will also bring in more crime. 31-5

5. A super center might also encourage truancy's from the school. 31-6

6. How is the city going to control the amount of litter that is allowed to float through parking lots in super centers, traffic, panhandlers, and solicitors. RV parking etc. 31-7

7. I feel that the city should just leave the Westside alone. We moved here for a reason. Do you not feel that every city needs a nice part that is not ruined by commercial sites? We need a part of the city that just has some nice homes. 31-8

8. I have always believed in spending money in the city I live to support it. But I do not support super centers on the Westside. 31-9

- 9. That area is also always flooded the minute we get a little rain, I am concerned about drainage as well. Also an increase in lighting will disturb the neighborhood. 31-10
- 10. Drug traffic happens often in super center parking lots. Let's not encourage that. 31-11
- 11. There are plenty of vacant areas where businesses have failed for these stores to occupy. Do not clutter the West side. 31-12

Thank you in advance for your considerations to these concerns and others that will come up.

I would appreciate a response to all issues raised.

Thank you,

Alane Alden
42009 Allan Drive
Lancaster, Ca. 93536
or emial
nursemom50@gmail.com

February 4, 2009

Ms. Jocelyn Swain
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain,

We are writing this notice to oppose the commercial re-zoning of two (2) projects at 60th Street West and Avenue L (NW and SE concerns). I have read the Draft Environmental Impact Report(s) and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

32-1

- Effect on the school environment
- Increased traffic flow
- Too close to rural Quartz Hill
- Drainage problems
- Noise on nearby properties, homes and schools
- Too close to Quartz Hill High School

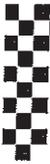
Sincerely,

Paul Borzaga

Paul Borzaga
Sherrie Borzaga
4633 West Avenue M-14
Quartz Hill, CA 93536

Sherrie Borzaga





Comment Letter No. 33

February 4, 2009

Letter to the City of Lancaster:

I have lived in Quartz Hill for the last 30+ years. I enjoy the rural community immensely.

On occasions I have had to take my granddaughter to Quartz Hill High and pick her up as well.

It is always a dangerously area, heavily congested with kids and cars. I am surprised no one has been killed there yet.

33-1

It is my firm opinion that if 2 stores are added to the area, the traffic problems will intensify 10 percent. The influx of kids in the stores would increase the shopping lifting that already exists, especially with the economy the way is now. There is a hazard waiting to happen. The kids will also have a better exposure to alcohol since both Target and Wal-Mart sell it.

33-2

The loss column of both show that they are not doing well now either, so why build a big eye sore that has a high probability of going empty all too soon. That will add to the community.

33-3

We do not need either one of these stores since we have a CVS, Vons, and a Hardware store so close. Really Wal-Mart is only 6 miles away and Target is 11 miles away!

33-4

I VOTE NO ON EITHER A TARGET AND A WAL-MART TO SCREW UP THIS SMALL COMMUNITY FEELING.

Sincerely

Doris H. Davis



February 4, 2009

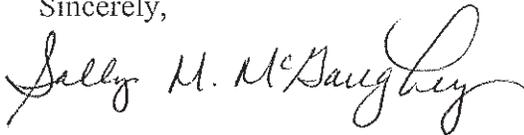
Ms. Jocelyn Swain
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain:

I am writing this notice of refute to oppose the commercial re-zoning of two (2) projects at 60th Street West and Avenue L (NW and SE corners.) I have read the Draft Environmental Impact Report (s) and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

Traffic flow
Developments too near the high schools
Too close to the vicinity of rural Quartz Hill
Increased traffic in rural Quartz Hill
Drainage is never properly addressed
Effect on school environment
Noise radiating to neighboring properties (schools and homes)

Sincerely,



Sally McGaughey
2837 West Ash Glen Avenue
Lancaster, CA 93536

34-1



February 4, 2009



Ms. Jocelyn Swain
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain,

We are writing this notice to oppose the commercial re-zoning of two (2) projects at 60th Street West and Avenue L (NW and SE concerns). I have read the Draft Environmental Impact Report(s) and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

- Quality of life
- Effect of school environment
- Too close to the Quartz Hill rural community
- Traffic flow
- Noise radiating to Quartz Hill High School and the neighboring homes
- Danger in increased traffic in Quartz Hill

35-1

Sincerely,

Bob Pearce
Loretta Pearce

Bob Pearce
Loretta Pearce
42963 Sachs Drive
Lancaster, CA 93534

02-08-07
42022 - Quail-Creek
Quartz - Hill
Lancaster, CA
93536
cell # 661-444-194
Barb Wells @ yahoo.com

Attention:
Jacelyn Swain,
Associate Planner
44933 - Fern Ave.
Lancaster, CA 93534

Having read in the Quartz-Hill Connection
Newspaper about the Proposal of
a Walmart Store's possible erection
located at 60th St. & Ave. L, I
felt compelled to write.

It is my noting some elements
not conducive for location near a
School - especially a High School
where students are older with yet
more freedom.

Trash Trucks, long bed Wares Trucks,
car Parks full, organizations asking
for hand-outs, Homeless, shopping -
carts zig zagging just every where - all
lead to the fact that a far better
location (not so near residents homes
either) ought to be seriously considered

Thank you for this time of allowing
us this communication. Sincerely,

Wes & Barbara Wells

February 6, 2009
Leslie Baker
42444 65th St. West
Lancaster, CA 93536



To The City of Lancaster:

I urge you to stop the proposed rezoning process in order to build three separate superstores on these locations.

I moved to the Quartz Hill area to get away from the stores and traffic. If your proposed rezoning is accomplished I will be very upset. There is no reason that there has to be superstores everywhere. I gladly drive the 6 miles to visit them now, which is why I moved to an outlying area. If these stores are built I will boycott them forever.

Do not vote to ruin our rural community of Quartz Hill with these developments of Walmart, Home Depot, Target and Lowes.

A concerned resident,

Leslie Baker

37-1



February 6, 2009
Kelsey Jepson
42444 65th St. West
Lancaster, CA 93536



To The City of Lancaster:

I urge you to stop the proposed rezoning process in order to build three separate superstores on these locations.

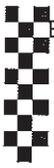
I moved to the Quartz Hill area to get away from the stores and traffic. If your proposed rezoning is accomplished I will be very upset. There is no reason that there has to be superstores everywhere. I gladly drive the 6 miles to visit them now, which is why I moved to an outlying area. If these stores are built I will boycott them forever.

Do not vote to ruin our rural community of Quartz Hill with these developments of Walmart, Home Depot, Target and Lowes.

A concerned resident,

Kelsey Jepson

38-1



February 4, 2009

Letter to the City of Lancaster:

I have lived in Quartz Hill for the last 30+ years. I enjoy the rural community immensely.

I take my daughter to and pick her up from Quartz Hill High. It is always a dangerously area, heavily congested with kids and cars. I am surprised no one has been killed there yet.

39-1

It is my strong opinion that if 2 stores are added to the area, the traffic problems will intensify 100 percent. The influx of kids in the stores would increase the shopping lifting that already exists, especially with the economy so bad. It would seem like the stores are saying "come in and steal from me." The kids will also have a better exposure to alcohol since both Target and Wal-Mart sell it.

39-2

Why do we need more empty stores, the superstores are not doing as well as they were.

39-3

I would not and don't now use them since we have a Von's, CVS, DeWolfe, pet store and such only 1-4 miles away.

39-4

I VOTE NO ON EITHER a TARGET OR a WAL-MART in this area. Let them go else where!!!

Sincerely

Maureen MacKenzie

Joelle MacKenzie Student

Ashley MacKenzie Student



Swain, Jocelyn

From: Timothy Richardson [lil_timmer@yahoo.com]
Sent: Sunday, February 08, 2009 3:13 PM
To: Swain, Jocelyn
Subject: Re: Wal-mart supercenter

There would be positives and negatives to building a Wal-mart Supercenter near Quartz Hill High school. The main reason many locals living in Quartz Hill don't want a Wal-mart built is because it will put most local businesses out of business. Another problem, being a student at Quartz Hill, would be the odds of car accidents would most likely go up if the super center was built. According to Wal-mart security systems there are many cameras and security officers, so for the most part increased crime won't occur. There would probably be more increased tax revenues which would also help the Quartz Hill and perhaps the Palmdale area.

40-1

Because of the traffic congestion I think it would be best for the city to build the super center out towards 70th street west. This way it would please most people and keep the high school traffic reduced and would relax most Quartz Hill local bussinesses.

40-2

Thank you for your time and consideration.

-Tim Richardson
Quartz Hill High Student





Comment Letter No. 41

Please do not reply to this message, as it will go to an unread mailbox

Open Attachment:
-- Forwarded Message --

Ms. Swain

Date: [Fri, 6 Feb 2009 20:25:11 -0500]
From: gammie318@roadrunner.com
To: LorettaBerryquartzhillcares@yahoo.com
Subject:

The projects at 60th St. & Ave. L --Walmart right across the street School is absolutely ridiculous. It impacts the high school kids and families who purchased homes in our area for peace and quiet. This will be abominable and it will be unsafe for our kids. This goes to the project (Target) right in between homes and right across the street Junior High. What was in the minds of our Lancaster council when these projects? Do they own a piece of the land? Are they for the kids or for the safety of their investments? I am ashamed to our council people who do not give a heck about our kids and about prices depreciating. Think about how you would feel if you lived neighborhood. Carole Strassberg, Senior Citizen Homeowner.

41-1

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Product Center

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Hotlines



Swain, Jocelyn

From: T. Vincent [grandmatami@hotmail.com]
Sent: Sunday, February 08, 2009 10:19 PM
To: Swain, Jocelyn
Subject: Wal-mart 60th Street west

Attn: Jocelyn Swain, Assistant Planner Lancaster

My husband and I have lived in the Antelope Valley for over twenty years now, fourteen of those years in Lancaster. Our first home was near 30th Street west and Avenue J, we moved from that location because we saw the neighborhood change, that change was due to Wal-mart. Wal-mart in the area brought the quality of life down. I felt unsafe to be out and about around the shopping area, so walks in my own neighborhood was out even if it wasn't alone. We moved to 66th West and L-4 to get away from those kind of stores. I feel safe in my neighborhood now, but if the situation changes it will most likely affect the quality of my life again. We definitely do not want these kind of stores on 60th Street West. Every neighbor I have talked to does NOT want Wal-mart in the area. How many of these stores does any community need away, if we want to shop there we will drive the very short ten minute drive. Please do not allow Wal-mart in this area, they will not improve any part of this community. Being that it has been zoned for Housing and not commercial makes me think that this is what the original plan was to begin with and changing it now would go against the majority of the people who bought homes near there. I would like to know what benefits it would make to the community as a whole? It just cannot outweigh the bad.

42-1

Thank you for your time,

Tami Vincent
6545 Lacolle Place
Lancaster, CA 93536



Lancaster City officials:

2/4/09

Comment Letter No. 43

I've been a resident of Quartz Hill for nearly 45 years. Quartz Hill does not need rezoning to bring in Wal-Mart, Target and other businesses we don't need or want.

It's a rural area for a reason - people like it and do not consider driving a few miles to shop as an inconvenience but rather a choice in order to keep the area mainly rural. Too many housing tracks on small lots is compromising enough.

Don't further complicate the problem with unnecessary, unwanted big business centers. It would also be very poor planning to ever have a shopping area anywhere near a school, especially a high school - that should be obvious!

Thank you for your consideration in this very important matter.

Sincerely,
Mary Humphreys

RECEIVED
FEB 2009
City of Lancaster
Planning Department

43-1



Feb 6, 2009

Dear Mr. [Name] and the City of Lancaster,

I am very much concerned about the Walmart, Target, and other shopping centers being considered at both St West and Ave. L.

As for the environmental impact study done, the traffic study was not done at the high traffic times before and after school at Quartz Hill High School. There were no studies done on pedestrian or bicycle traffic at these times, and how will the air quality be affected for the outdoor sports and band practices after school? Will this harm students who may have asthma?

The nearest police station is ten miles away at Sierra Highway and Lancaster Blvd, the super stores do bring crime into the area, especially 24 hour stores.

Thank you for your consideration, please reply.

Mrs. Bonnie Hutchings

H Bill & Bonnie Hutchings
5532 W. Ave. M-4
Quartz Hill, CA 93536

44-1

February 7, 2009



TO:
Jocelyn Swain, Associate Planner, Environmental
City Of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534

FROM:
Margie L. Smith
4547 W Ave L-12
Quartz Hill, CA 93536
E-Mail: smithtreska@aol.com

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the location of 60th St W & Ave L & 60th St W and Ave K & 60th St W and Ave L-8. I have read parts of the Draft EIR and do not agree with the traffic and water impact of our community. The ranchers were unable to continue with the Alfalfa growing due to the water table decreasing. Over the years it has just gotten worse. We are already being told to conserve our domestic water. And I know this for a fact as I was born here and have lived here all my life and have raised my children and now have grand & great children here. I was with the group rallying at 60th and Ave L on the 30th of January and myself counted over 350 cars going south on 60th between 7 & 7:30. Three others were counting the other directions and over 600 cars were going from east to west in that same period we were there from 6:00 until 8 AM.

45-1

Thank You

Margie L. Smith

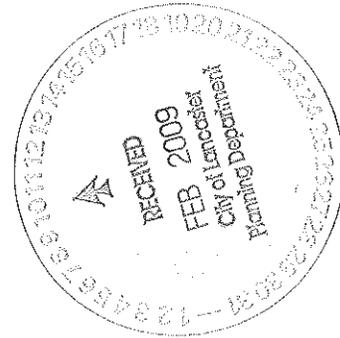
Swain, Jocelyn

From: gammie319@roadrunner.com
Sent: Tuesday, February 10, 2009 4:13 PM
To: Swain, Jocelyn

DUMP WALMART AND TARGET--THEY HAVE ENOUGH STORES IN THIS TOWN.. I live in Quartz -- if *I wanted stores around us we would have moved to the city. There are too many children around the projects presented--those who attend Quartz Hill High School and those who attend Joe Walker J.H. It is too dangerous to have in and out while kids are going to and from school. The traffic would be overwhelming. Whose rediculous idea is this to have shopping centers near schools and private homes? Is Walmart and Target going to pay me for the loss of appreciation on my home if they are allowed to build. What about the noise factor while kids are trying to learn--with the trucks up and down the street, and the cars? What about the aspect of safeness when kids are coming and going to school? Also, the Draft EIR'S do not address the depreciation factors of private property and the EIR'S do not address the noise/traffic increase.

46-1

Carole Strassberg, Senior Citizen Quartz Hill Homeowner



To whom it may concern,

We do not need a shopping center across the street from the High School. Think of the safety of our kids.

There is enough traffic in that area

Save our neighborhood and do not rezone it.

Leave our Town the way it is.

Elaine Varner



Samuel C Varner
4518 W Avenue M4
Lancaster CA 93536-2919

47-1



Swain, Jocelyn

From: PATRICIA BEANE [pbeane@avhsd.org]
Sent: Wednesday, February 11, 2009 11:19 AM
To: Swain, Jocelyn
Subject: Project on 60th/L West

Dear Mrs. Swain:

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th West and Ave L.

48-1

I have read the Draft EIR(s) and disagree with some of its collected data. In response to the reports, I have listed my concerns for my community below. Further, I request that my concerns be addressed prior to a decision being made to approve of this zoning.

The importance of an education for students at Quartz Hill High School is my primary concern. How can you assure that each student's education is not disrupted during construction, road-widening, construction equipment on public roadways, noise and complications and delays of building and construction? All of this is before stores even open! Once the shopping centers open, a whole new set of disruptions and lawsuits will arise by students parents.

48-2

Mrs. Swain, there is a lot of empty land available for this type of project anywhere else in the Antelope Valley. Why in front of a Distinguished School? Why at the expense of students? It is difficult enough to motivate students to attend from 7:30 to 2:53, but to dangle such a carrot in front of them is reprehensible and unjustifiable... just for a profit?

48-3

Patricia Beane
Work Experience Coordinator, QHHS
District Work Experience Department Chair
661) 718-3100 ext. 126

Hard work spotlights the character of people: some turn up their sleeves, some turn up their noses, and some don't turn up at all. Sam Ewing (
<http://www.quotationspage.com/quotes/Sam Ewing/>)



February 11, 2009

David Lake
 42158 Ash Ct.
 Lancaster, CA 93536

Ms. Jocelyn Swain
 City of Lancaster
 Planning Department
 44933 Fern Avenue
 Lancaster, CA 93534



Dear Ms. Swain and the Planning Dept of Lancaster,

After reviewing the Environmental Impact Report (EIR) draft of the Lane Ranch Town Center I felt compelled to submit a response. As a Lancaster home owner living to the south of this proposed project, I have found this report to have a great deal of incorrect and incomplete assumptions. I would even accuse the developer of this report of being biased in favor of the developer in several instances instead of being neutral as should be the case. I intend to respond to what, I feel, are the more glaring problems in the hope that the planning commission will do what is right for the home owners in the area affected by this project and the Commons at Quartz Hill project; move them both to a more appropriate location. It must be noted that the residence in this area moved here because we DO NOT want to be near these types of commercial developments. We prefer small mom-and-pop type businesses with more personal contacts that come with the small town environment that is found on nearby 50th street. This is the life style that will come to an end at the hands of a few developers that do not care about the people. They don't live in this area. They just want to make money at the expense of others. To place projects such as this in the proposed location would show the voting constituency that the city is not about well thought out progressive city planning that is more environmentally sound, but more about chasing tax dollars and being subservient to the developers that don't even live in the Antelope Valley.

49-1

Visual Character and Quality

This section attempts to minimize the changes in visual character once the proposed structures are complete. In an urban residential situation the typical structure is a single or two-story home placed on a 7,000 to 10,000 square foot lot and is developed with tree-lined roads, green belts, and, occasionally, parks. In contrast, the typical commercial development is characterized by very large structures three to four stories in height (counting facades) and surrounded by expanses of paved parking and maintenance areas. Though trees and other green spaces are usually placed for aesthetics, these items are kept to a minimum in favor of space use efficiency. In the proposed development this impact would indeed be a **significant impact** due to the size of the project (35 acres). The structures would themselves pose a significant impact due to the size and area covered (~ 394,575 square feet). This would make these structures the dominant features in the area, both in height and overall size. This is completely incompatible with the surrounding residential landscape.

49-2

Views and View Corridors

Views and view corridors are found throughout the Antelope Valley. With regard to the project area, the report only discusses the impact on viewing the San Gabriel Mountains to the south of the project. It states “Considering the distance of the mountains from the project site, which is approximately seven miles, long-range views from the surrounding area would still be available above and around the proposed development.” This does not take into account the view impact to the residences immediately east of the proposed development which will have the east wall (the back of the structures) of the development as their new view. The report also does not address the current view of the Tehachapi Mountains to the north which provide a vista-like view to residences and particularly for those west facing residences located on 57th Street West which will be facing the rear of the project being proposed. This is a significant part of the ambience of the area, helping to cultivate the “country feel” that is desired in this area of the Antelope Valley. The report, in this case, does not consider all possible permanent, public vantage points. It is deficient in that it does not consider residential views and the impact to the pre-existing public facilities located nearby.

49-3

Light and Glare

Light and glare will be significant factors on this project. Though the report discusses various light mitigation methods, it does not account for the 24 hour lighting consideration. Whereas all other facilities in the area extinguish exterior lighting starting at 9:00 to 10:00 P.M. depending on the event, the tenant is most likely planning to operate exterior lighting 7 days a week. The nearest light and glare generating facility, Quartz Hill High School, has stadium lights which are switched off as soon as field cleanup is complete post event. Lane Park and Joe Walker Middle School both extinguish all non-emergency lighting by 9:30 P.M. including parking lot lighting. This new lighting will provide a dramatic and certainly unwelcome contrast. The report also discusses glare and its impact but does not consider the glare created by consumer/employee automobiles and supply vehicles moving to and from the projected development. All these vehicles contain angled glass and polished finishes that readily produce significant glare during the day and extra lighting impacts at night.

49-4

Air Quality Plan Consistency

This portion of the EIR is terribly inaccurate in most aspects. It is correct that the project has not been accounted for in the City’s General Plan; however, this project will do nothing to reduce vehicle emissions and will not generate employment opportunities for the local area. The real facts are that the addition of this project will only redistribute the vehicle emissions as vehicles that may have gone to one of the other **four** existing super centers will now also be commuting to this new project. Local residents will also drive to the site just as to the other sites with no decrease in emissions. Finally, the forecast is for approximately 828 employees at this site. As these employees will be mostly minimum wage earners, they will not be able to afford the homes in this area and therefore will have to commute from other parts of the city.

49-5

Employment

The employment forecast for this project is full and part time employment for approximately 828 persons. Due to the nature of the retail industry, only a small percentage of these jobs will be full time. The remaining will be part time and seasonal employment. The majority of these part time employees will come from other businesses as they down size to compete with the larger

49-6

retailers. Three university studies (Albert Myles et. al, "The Economic Impact of Wal-mart Super centers on Existing Businesses in Mississippi," Mississippi State University, 2005; Kenneth E. Stone, "Impact of the Wal-mart Phenomenon on Rural Communities," Iowa State University, 1997; David Neumark, Junfu Zhang, and Stephen Ciccarella, "The Effects of Wal-Mart on Local Labor Markets," working paper, Public Policy Institute of California, April 2006) all reached the same conclusion, that for every big box retailer opened, each big box employee replaced 1.5 retail employees at surrounding stores in the area resulting in a net loss of employment for the area. The conclusions therefore contradict the SCAG forecast mentioned in the report. Furthermore, as the majority of the jobs will be part time there can be no lessening of the "current job/housing imbalance" as these same employees will not qualify for the loans needed to purchase the existing homes in the area. Therefore, this project will not help remedy, but instead will contribute to the current employment issues.

49-6

Housing

It is true that there are 78 new housing developments proposed. The report does not acknowledge that most of them are proposed for construction in the *distant* future and may or may not add the number of homes in question. The report also neglects to mention that the majority of the residents purchasing these homes do not work in the Antelope Valley but commute to the Los Angeles area, Edwards Air Force Base, Victorville, Bakersfield, Mojave, and Ridgecrest. These are the higher paid technical, financial, and corporate professionals that can afford the homes mentioned in the report. Research has shown that retail employees typically do not have the income to purchase homes due to most of the jobs being of a part time nature. A national study found that every additional Wal-Mart store that opens reduces total earnings for retail workers by 1.3%. (Arindrajit Dube, Barry Eidlin, and Bill Lester, "Impact of Wal-Mart Growth on Earnings throughout the Retail Sector in Urban and Rural Counties," Institute of Industrial Relations Working Paper Series, 2005). Finally, the current city infrastructure will not support the construction projects proposed. As of this writing there is already one home project nearby that has had to be abandoned with home owners stuck with virtually worthless property because the city can not provide adequate water pressure to the site and litigation is moving through the California court system that could further restrict the amount of water available. So, is the city going to restrict water usage for all so that more homes can be built?

49-7

LACFD Review

The developer will be required to pay developer fees to cover staffing, equipment, and facilities that currently do not exist. The county does not have the funds to cover the existing needs even after taking into account "developer fees." It would be highly inappropriate to assume that paying a fee will fix the problem. To the taxpayer, a fee is nothing more that a form of pay off to get permission to do something.

49-8

Long-Term Operational Impacts

Though the LACSD Lancaster Station is of the position that the proposed project will not be an issue the statistics for just two of the existing Wal-marts in the Antelope Valley indicate that more officers will probably be needed: Valley Central Way, Lancaster, 2002-2005, 336 calls with a cost of \$26,400 to taxpayers; 47th Street East, Palmdale, 2002-2005, 358 calls with a cost of \$27,745 to taxpayers. These are just two of the four Wal-marts. What about the cost of the other Targets, Home Depots, and the other big box stores. Will the LACSD have to post officers

49-9

at Quartz Hill High School twice each day to monitor traffic during beginning and end of school or during sporting events as pedestrians and vehicles begin using the retail parking areas as meeting or free parking during school activities? These translate to extra dollars for services, i.e. increased taxes.

49-9

Trip Generation

As the report states, the addition of this project would have a major impact on already impacted roads. This project would put the traffic conditions on par with the congestion at the intersections of Avenue K and 10th Street West or Avenue P and 10th Street West. The difference will be that everyday when Quartz Hill High School begins and ends its day, the conditions will more resemble the Christmas Season only there will be cars in the streets along with students entering and leaving school property. It is a foregone conclusion that there will be accidents or students injured during these time periods. Additionally, the report does not address mitigation of school activities (sports events, concerts, vehicle access for student drop off and pick up). During large events it is not unusual for vehicles to be parked in the area of the proposed project and along the surrounding streets. These vehicles will most likely use the retail parking lots for these events as a form of free parking. This, I'm sure, will generate many complaints from retailers as well as residents.

49-10

Transportation and Traffic

The report outlines twenty-three improvements that will be required to mitigate traffic impacts in the area of the proposed project. The construction period will be extensive and will have severe impacts to traffic around Quartz Hill High School for both vehicle and student traffic, not forgetting commuters going to and from their residences. The report also, for each mitigation, the report states "Therefore, the project applicant shall provide fair share contribution towards this improvement." When a company of this size is proposing a project that will impact the community to the magnitude of this one, there is a very real and ethical question of why subsidies of any type are even being considered when their annual revenues total approximately \$63,367,000,000.00 per year as reported on the New York Stock Exchange. It must be noted that this project was not requested by the community, but is being presented by a developer.

49-11

Summary

This report is paid for by the developer and it shows. I have pointed out just some of the concerns that were left out or overlooked. Many of the most important concerns of the residents of the affected area were not addressed or given a glossing over. The only real course for this report is to have it completely overhauled then submitted to a citizens group for further analysis. I have shown the incompleteness of the mitigations as well as the inaccuracies of some of the statistics that bear out the fallacies I have described. I have touched on the financial impact for the city and its taxpayers in terms of net lost employment and reduced income. What still needs to be discussed by the commission is the reasoning for placing not one but two major retail facilities across the street and less than half a mile away from a major high school and middle school. The report even mentions (though indirectly) subsidies for various mitigation. What could be the reason for changing a traditional residential area into another overcrowded commercial zone like 10th Street West and Avenue K or 10th Street West and Avenue P.? The answer is irresponsible city planning or financial greed by developers (developers that do not even live in the Antelope Valley) who do not care about what the voters/taxpayers of the area

49-12

desire. I strongly urge the commission to thoroughly research this and any other project before rendering any decision about future development of our city with an eye toward what would really make this a great city to live and move a business.

49-12

Acknowledging, however, that most of the property in question is already zoned Commercial Planned Development (CPD) and Office Professional (OP), the more community conscious solution would be to develop the site as the report describes in Alternative 2: Existing Zoning Alternative. "Under the Existing Zoning Alternative, the project site would be developed with 500,000 square feet of Office Professional/Commercial uses in accordance with the existing zoning of the project site. The type of uses permitted under this scenario would include banks, delis, ice cream shops, dry cleaners, barbers, and general office space (including medical offices). No big box retail uses would be included." This alternative would better complement the existing residential and "country feel" of the area, especially if the project were given a more park-like design that encourages pedestrian traffic.

49-13

Cc: File

Julie Drake, Antelope Valley Press

Swain, Jocelyn

From: Crosby, Terry
Sent: Thursday, February 12, 2009 10:52 AM
To: Swain, Jocelyn
Cc: Tainatongo, Kelvin
Subject: FW: What we want



Terry Crosby
City of Lancaster
tcrosby@cityoflancasterca.org
661-723-6007

From: tammany FIELDS [mailto:tammanykfields@hotmail.com]
Sent: Thursday, February 12, 2009 9:56 AM
To: Crosby, Terry
Subject: What we want

T. Crosby,

You are asking what the people want well here it is... No Super Stores at the proposed locations in and around Quartz Hill High School. This is just wrong and will generate nothing but problems for the schools and their ability to cope with truancy, traffic, crime, litter, noise pollution and the list goes on. The only thing that makes sense to be built there is a trade school or something of that nature.

50-1

I have three children moving their way up the school and will attend the schools near the proposed sites. This is not going to do anything but ghetto another community. It will kill 50th St. West and those people who have busniess that offers goods and services that meet the needs of the 8000 or so towns people here in Quartz Hill. They need to feed their families, pay their mortgages and do you think WalMart will offer pay and jobs that will do that ? the answer is no. Please don't sell out education and our future by robbing the peace and tranquility they deserve. It would take me 7 minutes to get to the closet WalMart if I chose to shop there so why do we need one even closer.

50-2

Sincerely, Tammany Fields
5814 west Columbia way
Quartz Hill, CA 93536
661 943-1199

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Swain, Jocelyn

From: Tainatongo, Kelvin
Sent: Thursday, February 12, 2009 9:34 AM
To: Swain, Jocelyn
Cc: Ludicke, Brian; Crosby, Terry
Subject: FW: Look at all of the Advantages

Jocelyn,

Are these email comments to be considered official public comments now that the EIR is out for public review and comment? If so, is it expected that staff will respond to each comment? Please advise so that we can also inform the Mayor and Council.



Thanks,
Kelvin

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

From: Crosby, Terry
Sent: Thursday, February 12, 2009 8:27 AM
To: Tainatongo, Kelvin
Subject: FW: Look at all of the Advantages

It appears there is an organized campaign of sending letters on 60th & L. See another message received by City Council. Should I be forwarding these to Jocelyn Swain or just filing them?

Terry Crosby
City of Lancaster
tcrosby@cityoflancasterca.org
661-723-6007

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

From: Carmen Roberts [mailto:carmsworld@roadrunner.com]
Sent: Wednesday, February 11, 2009 7:49 PM
To: Smith, Ron; Mann, Ken; nhickling@lacbos.org; Parris, R Rex; Crosby, Terry; AV Press Editor
Subject: Look at all of the Advantages

Just think of the advantage for some, of having a makeshift camp site just a mile down the road from the California State Penitentiary. How wonderful for family members traveling a distance to visit. They can legally park in the parking lot the night before in order to get a jumpstart and be one of the first in line the following morning to go and visit their loved ones. And how convenient to have a 24 hour superstore where they can do a little shopping, buy snacks, etc. for their short camping trip. 51-1

How convenient will it be for the HS students across the street, after of course they are able to make their way thru the heavy traffic to get to school. It will bring them a most convenient place to hang out before, after, maybe even during school hours. I wonder who else might be hanging out in the same location. 51-2

Think of the 1,000+ unknowing victims that bought their homes in the West Lancaster/Quartz Hill area in the last couple of years. We all know their home values along with the rest of our home values have declined rapidly and significantly. This new project will only help further reduce their value. And to think that it was never disclosed to them that although one of the sites is zoned residential, they will soon have a new SuperCenter where they can shop. 51-3

Additional tax revenue for our beautiful City of Lancaster would be wonderful. But won't this 5th location in our Valley really only shift revenue from one store to another? Enough is Enough ~ You have all made it clear that you want to clean up this Valley by cracking down on gangs and crime, regulating the Section 8, etc. Why on Earth would you even consider allowing another Discount SuperCenter here. If you don't start to build this Valley up, it will continue to deteriorate. We have our share of SuperCenters. If that's all the better we can do ~ then perhaps we should wait until our Valley is at a point where something other than discount feels comfortable moving in.

52-4

C Roberts
Lancaster, CA

Swain, Jocelyn

From: Hellen Robertson [hellorobertson@hotmail.com]
Sent: Thursday, February 12, 2009 11:06 PM
To: Swain, Jocelyn
Subject: Opposing re-zoning at 60th St. and Avenue L

Only crazy (or greedy) people would OK building a mammoth Supercenter accross a High School! What about the increase in crime, traffic, the death sentence of the small businesses in our town, sure truancy of the students wandering into the electronics departments of the proposed stores? Have you taken a good look at the type of customers who shop at Walmart, Valley Central Way? They come to that store in their robes and rollers on their hair, they do not bother to clean up nor comb their hair... Is this what you want accross the street from Quartz Hill High School?

Either City Hall is getting money under the table to OK this nonsensical project or they are all a bunch of stupid ignoramuses! Either way, this cannot and will not be accepted! Just remember, the same way WE put you in office, WE can get you out!

Hellen Robertson
4776 W Ave J-7
Lancaster, Ca 93536
661-733-1197



52-1

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Dear Jocelyn Swain,

RECEIVED 2/14/09
FEB 2009
City of Lancaster
Planning Department

Please build the new Walmart. I am an 18 year old junior at Quartz Hill High School. I do not own a car so it's very hard for me to go into town every morning to buy my Red Bull and cigarettes. If you build the Walmart I can buy these before or after school. Therefore, I would have more time to study for the classes that I failed in ninth & tenth grades.

Phone# 943-9130

Thank You,

Rashawn Cole
Rashawn Cole

Swain, Jocelyn

From: Don & Cheryl [d.cooks@verizon.net]
Sent: Monday, February 16, 2009 8:09 PM
To: Swain, Jocelyn
Subject: Quartz Hill



Hello Ms. Swain

I was born at A.V. hospital almost 50 years ago, I have been fortunate enough to live in Quartz Hill my entire life only 3 different addresses so far. In Quartz Hill you could always tell when it was getting close to fair, the kids would be walking their lambs down the street, exercising and teaching them to walk on the halters. The last time I saw a lamb and it's junior exhibitor walking down the streets in Q.H. was my daughter and her friend about 3-4 years ago. Because of the increase in traffic we made the kids start working their animals in the backyards. When I was a kid I walked and rode my horse everywhere without a care or concern about crossing the roads. I thought I would never leave here, I thought I would never want to, but, sadly, recently that is no longer the case. Since I don't plan on being here forever, I shouldn't care what happens, like wal-mart and target super centers coming in here. BUT, I am still here, and I do care.

54-1

I am most concerned with the fact that those super center plan to move in across the street from the high school, that's crazy. If it has to be rezoned for this my vote is NO, it would be better to have houses there then shopping centers, homeowners usually care about where they live, but super centers don't care what happens what happens to the vicinity around them. One being the traffic, it's a mess out there in the morning at the start of school and in the afternoon when school lets out, and then to add 24/7 shopping traffic, shoppers who really aren't looking for kids to be darting across the streets, yeah I know they would make the street wider, but that is just going to make condition really unsafe for those driving or walking to and from school, in the afternoon you have got to get there at least 25 minutes before school lets out to get a place to park so your kids don't have to cross the streets, some still have to cross the streets, both sides of Ave L and 60th St. by the school are parked full. Not to mention it will be a place for the kids to hang out / hide out, making them late (morning and lunch) for school or not going at all, and booze and cigarettes that close to a high school cannot be that great of an idea. Two being the Riff Raff that comes along with shopping centers begging, bumming, stealing, etc. It's not a good combination. What's going to keep it all from overflowing to the high school. The high school with the best reputation in the valley, a safe and good school. It's an invitation for disaster. If they go in across the street the sheriff station needs to go in the high school parking lot.

54-2

Three being the trash, by trash I don't mean the Riff Raff, I mean the trash, you can tell when your near a wal-mart, you can see their bags blowin down the street, stuck on a tree or a pole, laying in the gutter, I think that is way they got rid of their blue bags, those blue bags were a dead give away they were wal-mart bags, now they look just like the rest of the trash, white bags, you have to look on the bag to see who's name is on them. We have 4 wal-marts and 3 targets in the Antelope Valley, and I for one don't mind driving the 6-7 miles to get there if I so desire, I just don't want them in my backyard.

54-3

And YES it will kill the little man (the businesses) in Quartz Hill.

55-4

We live on L-8 & 55th and have a difficult time backing out of the drive way in the morning at school time or the afternoon when school lets out, that's because people take every street they can to get home because Ave. L and 60th ST. both have a line of cars a mile long, OK maybe not a mile, but very long lines of cars and they take every side street there is to get around that.

54-5

That's my two cents worth, thanx for reading/listening,
A concerned Quartz Hill resident
Cheryl Cook



Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534



February 17, 2009

Dear Jocelyn,

This is the first time I have ever written a letter such as this, but I feel that I would not be doing my civic duty if I were to keep silent at this time. I have seen the several demonstrations and read the environmental impact reports regarding the building of a Wal-Mart super center at the corner of 60th Street West and Avenue L. Quite frankly, I feel this would be the worst possible place to build any kind of retail establishment, especially a Wal-Mart. The most basic reason for my concern is that a retail store of this kind would very quickly lead to the delinquency of students from Quartz Hill High School and possibly from nearby Joe Walker Middle School. I can foresee kids cutting class to hang out at Wal-Mart and also the very real possibility of drug dealers lying in wait for our children in the parking lot. This is a residential neighborhood, relatively safe, where kids walk to school from several blocks in many directions. The attraction of any large retail store would prove to be too much for many kids and I fear they would never make it to school. I've read of many crimes that take place in and around Wal-Mart centers including mugging, rape, theft and vandalism. As a parent, I strive to keep my children safe from such influences. Allowing Wal-Mart to build a super center at this location would be nothing short of purposely exposing thousands of children to these potential hazards.

55-1

There are, of course, many other reasons pointed out in the environmental impact report that should be mentioned, but my biggest concern is for the safety and well-being of the youth of our community. I hope you will take my concerns to the planning department most earnestly and do not allow Wal-Mart to proceed with its plans to build a super center at this location.

55-2

Sincerely,


Susan L. Davis

Swain, Jocelyn

From: Tianna Hierro [thierro@verizon.net]
Sent: Sunday, February 15, 2009 9:46 PM
To: Swain, Jocelyn
Subject: EIR

Dear Ms.Swain,

I am a resident of Quartz Hill writing to you concerning the EIR. I live off 57th st w and Ave K. It is my understanding that there is supposed to be a lowes shopping center going up on the nw corner. Really how many of these stores do we really need in this town? Not just that but as residents of this part of town we want to keep it like it is. It's quite and we do not have all the riff raff coming through our area that other parts of this city do. That is the way we like and want to keep it. Instead of building another store or mini shopping center use this area for better things. Such as building little league parks. Something that our kids can use and in the long run will serve the purpose of keeping our kids busy and off the streets. My daughter plays for AVGSA and we are using the pony fields in palmdale to play on, because we can no longer use the city park or tierra bonita school for our games. I as a parent would think that you as a growing city would push for these facilities for kids. Instead you want to build another target, walmart, and lowes. That will hire paroles and keep them here in our nice little town.

56-1



Swain, Jocelyn

From: scott holtfreter [plays_hockey@hotmail.com]
Sent: Sunday, February 15, 2009 11:04 AM
To: Swain, Jocelyn
Subject: The Commons

I would like to know why this shopping center is being planned, and why a WalMart supercenter is going there.

I cannot think of any good coming from this project. So, why is it being done?

57-1

thank you,
Scott

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*Jocelyn,
FYI*

Mr. Brian Siciliano
42028 Ash Court
Lancaster, CA 93536

11 February 2009



City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

Dear Mayor Parris,

Please have the City of Lancaster reconsider turning the area on 60th Street West and Avenue L from a residential zone to a commercial zone, specifically I am against Wal-Mart and Target building in these areas. The reason I am against this idea is because the city has plenty of these stores already and the tax gain if these stores were built would be lost by the closing of stores in nearby Quartz Hill. If I need to go to Wal-Mart, I can easily go to the store on Valley Central Way. Another reason why this is a bad idea is because the Quartz Hill High School is already there. We really don't need the high school students hanging out at Wal-Mart or Target before and after school. Thanks you for your time and consideration.

58-1

Sincerely,

Brian Siciliano

Swain, Jocelyn

From: Crosby, Terry
Sent: Sunday, February 15, 2009 5:42 PM
To: Swain, Jocelyn
Cc: Tainatongo, Kelvin
Subject: FW: Super Centers At L/K-8 and 60th



Jocelyn:

Another message received by Council regarding L & 60th.....for your attention.

Terry Crosby

From: Deborah Stuart [mailto:Redneckgrl5333@msn.com]
Sent: Fri 02/13/2009 06:41 AM
To: Parris, R Rex; Smith, Ron; Crosby, Terry; Mann, Ken; Hickling, Norm
Subject: Super Centers At L/K-8 and 60th

Mr. Parris, Smith, Crosby, Mann and Hickling,

I have never been in favor the the current projects proposed at the L and 60th location and it doesn't take a Rocket Scientist to look around and see the vacant store fronts in our community. I think it will be a detriment to the school by creating an already big truancy problem, (not to mention the alcohol issue) provide excessive traffic on Ave. L in the unincorporated side and severely hurt small business' in Quartz Hill that are currently struggling to stay alive. This is just a few problems. We in Quartz Hill love our small quaint community. We have so many Wal-Marts, Targets, Lowe's and Home Depots to shop at already should we choose to do so. Why more? Have you counted the number of empty homes that are surrounding this area lately? Drive the neighborhoods, check it out.

59-1

Mr. Smith said it will bring in revenue and jobs. Really? Will the hiring of the employees be monitored by the "E-verify" system to monitor illegals taking away jobs from tax paying citizens? All of these companies are currently laying employees off. This week in the Valley Press it was noted that we have over a million square feet of empty commercial real-estate and incentives are going to be given to the individuals who find tenants for these locations. I work for a large company in this valley. In my position, I deal with our business owners. Their sales have gone from a reduction of 35% a year ago to over 50% in sales currently. They share how they don't know if they can continue to pay their rents let alone there quarterly taxes. I ask you, what "Revenue" do you really hope to gain right now? Greed is what got our state and country into this fix and greed is a lot of what this project is about.

59-2

Please be objective with the whole picture when you put your vote to work here.

Thank you,
Deb Stuart



February 17, 2009

STEVEN J. WALDEN, MSgt (RET), USAF
6631 La Sarra Drive
Quartz Hill, California 93536

MS. JOCELYN SWAIN
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534

SUBJECT: Planned commercial re-zoning at 60th Street West and Avenue L

Dear Ms. Swain and the Department of Planning of Lancaster, California

I am writing this notification of refute and opposition of the commercial re-zoning plans for both the Northwest and Southeast corners of 60th Street West and Avenue L in Lancaster, California. I have studied, researched, reviewed the Draft Environmental Impact Report (DEIR) and have numerous questions and concerns of probable errors or omissions in the analysis and data of this report. The errors and omissions in this report are significant enough to affect the conclusion in this report and possibly influence the voting council. This report seems to be written to persuade the planning commission into believing that the data and analysis in this report is both accurate and sufficient for a vote to approve the re-zoning in this location. However, this data is momentous with flawed and swayed data that cannot be construed as truth until an unbiased study is completed and analyzed for accuracy and clarity.

60-1

During the course of this opposition letter I plan to address just a mere overview of the inaccuracies in this DEIR. I ask that the planning commission take notice to the discrepancies of the DEIR and request that a thorough, unbiased DEIR be conducted so that both the planning commission and the voting members of the City of Lancaster and Quartz Hill are afforded an honest evaluation of the planned re-zoning at the said locations prior to a vote to approve this re-zoning is completed.

The locations of these planned re-zonings affect my family and me as we are directly adjacent to these locations within one-half mile of both. These locations will have an adverse affect on both the quality of life and current serenity of our home with increases in traffic, visual characters, commercial lighting, industrial pollution (from fast food restaurants, commercial vehicles, and commercial emissions etc...). The current planned locations are zoned for (UR) which coincides with the immediate surrounding areas.

60-2

Also, with the planned re-zoning, water usage increases would result, and this after a halt of building of residential homes partially due to the lack of available water in these areas.

60-3

Finally, the simple fact that I as a retired United States Air Force member, settled my family down in the Antelope Valley and in Quartz Hill for two reasons, the job market for aviation is alive and well and the fact that my teenagers were able to attend one of the finest public schools that Los Angeles County has to offer. This institution would be forever devastated with the implementation of commercial facilities. Our teenagers would no longer have the freedom to hang out with classmates after school as the rate of crime would make a near vertical climb from the lack of crime at these locations currently.

60-4

Traffic which is currently climbing at an alarming rate would skyrocket and with the lack of available space for expansion. This effect would back traffic which at certain times of the day takes 10-15 minutes to cross the 60th St W and Ave L intersection, more than double to what it is currently. This is not a simple WAG, I have been there, and on any given school/workday more than 1300 vehicles travel this intersection in a one-two hour period.

60-5

The DEIR states that the closest LA County law enforcement facility is only 4 minutes away in Lancaster on Avenue I. This data is once again incorrect and needs to be re-addressed.

60-6

Fire protection is yet another concern. The DEIR states that a future Fire Station would have to be built, but the current budget has nothing for its funding.

60-7

The proposed increase for the storm drain is flawed. Currently, 60th Street West and Avenue L are at time completely un-passable to some vehicles as water drainage is a problem. Currently each and every overflow pond is at maximum capacity in and around Quartz Hill from the recent rain events. The DEIR states that an extension of the current system would include a 60-inch drain line directed west for about 1300 feet to the 57th Street West overflow holding pond. However, the DEIR states that future expansion if needed would be allotted for. My concern is where the current drain water that settles on the roads is making it impossible for some vehicles to pass. Is the plan for this current problem to disappear once the new drainage system is placed into the ground? This is not defined and needs to be addressed

60-8

This is a just a scratch in the surface of the errors and flaws that I as a member of this community have seen and identified. With these simple observations I respectfully request that the current DEIR be stricken and a thorough and unbiased DEIR be constructed and evaluated prior to a vote being taken on these planned re-zonings.

60-9

Sincerely,

//SIGNED//

Steven J. Walden MSgt (RET)
United States Air Force

Comment Letter No. 61
Julie R. Ankeny
43128 Flag Street
Lancaster, CA 93536
February 16, 2009

**ATTN: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534**

Re: proposed developments at 60th West and Ave. L

Dear Ms. Swain,

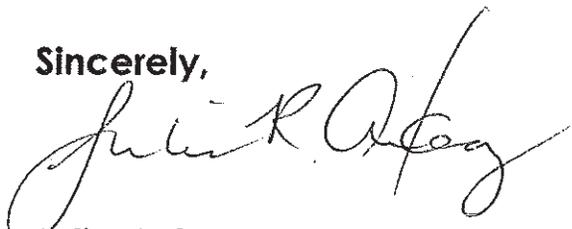
I am writing to oppose the Wal-Mart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

61-1

I know too that the result of these two MEGA stores would affect the parking situation for the QHHS as students would park in those businesses parking lots. Aren't there enough Wal-Marts and Targets in the Antelope Valley? They may bring a few jobs but they do not necessarily improve the quality of the lives of those who work there or live in its vicinity. I oppose that the City of Lancaster would benefit financially from this at the expense of Quartz Hill and its way of life. Why not build a Wal-Mart or a Target in the Downtown district close to Lancaster City Hall? Please do not let the Antelope Valley become the L.A. Basin.

61-2

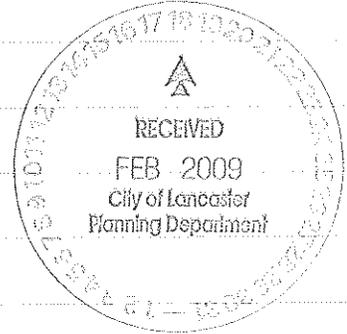
Sincerely,


Julie Ankeny



FEB 17, 2009

Project LOCATION City: LANCASTER
Corner of Ave L and both st, West



Walmart Supercenter

Target

home improvement store

No not want any retail stores,
FOR SURE NOT WALMART!
these stores will cause more crime
in area, Homeless people & people just
hanging around the stores.

62-1

Unita Davis

also all the
walmart stores
you have people

asking for money. 5621 W. Ave L-6
LANCASTER CA. 93536.

NO Retail STORES.

62-2

Thank you



Muriel Mouring
42018 Tilton Dr.
Lancaster, Ca 93536

February 16, 2009

Mr. R. Rex Parris
44933 Fern Ave.
Lancaster, Ca 93534

Bankruptcies—ex. __Circuit City; Closings—ex. __Albertsons East; Downsizing—ex. __
Starbucks, etc., etc.,--

_____ just the right time to rezone residentially zoned property to commercially zoned
property such as that on 60th St. West on Ave. K and L.

But, do we really need another Wal-Mart, Target, Home Depot, and or Lowes in Antelope
Valley and in particular Quartz Hill? The answer is obviously —No!

Most of these stores, when visited don't seem very busy. Television and newspaper reports
seem to confirm the observation as profits for all stores mentioned are down even Wal-Mart.
Why add to their misery?

However, the lure of potential tax revenue in years ahead is a tempting prospect for Lancaster,
Too bad the land on 60th St. West and Aves. K and L could not be considered for better use
for Antelope Valley and Quartz Hill. I hope commercial rezoning will be reconsidered.

63-1

Yours truly,

Muriel Mouring
Muriel Mouring

February 15, 2009

Planning Department
City of Lancaster
44933 Fern Ave.
Lancaster, CA 93534



**RE: Public Comments
Draft Environmental Impact Report
Lane Ranch Towne Center Project**

My initial objection to both the Draft Environmental Impact Report for The Commons at Quartz Hill and the Draft Environmental Lane Ranch Towne Center Project is a philosophical one. In the case of these projects it is assumed that the impacts created by such developments can actually be mitigated.

64-1

The purpose of developing a General Plan is described on the City's website as "the City's long-term outlook for the future. This view of the future is a reflection of the community's vision for how our natural and manmade environments should be organized and managed. The General Plan identifies the types of development that will be allowed, the spatial relationships among land uses, and the general pattern of future development." The website continues to say that "in order to keep the Plan on course, the City must, from time to time, re-examine the goals, objectives, policies specific actions in order to ensure that the General Plan remains in line with the community's expectations."

64-2

From a citizen's viewpoint, we rely on the City's existing General Plan when purchasing a home and making an informed decision on where, within the City, we would prefer to reside. While a revision to the General Plan, as with the updating of the 2030 General Plan, is one thing, a proposal for a drastic zone change under an existing General Plan is quite another.

By reviewing the Westside Zoning Map adopted with the 2020 General Plan, the entire proposed site for the Commons is designated, under the adopted General Plan, as solely single-family residential. It is completely reasonable to believe that homeowners purchasing homes within the area did so under the good-faith assumption that the City would honor the conclusions of the adopted Plan and that the neighborhoods would remain residential, at the very least until such time that the General Plan was updated. These updates would include not only public comments, but an overall review by staff to determine "how our natural and manmade environments should be organized and managed." This would represent a reasonable and informed revision to the General Plan if indeed a revision is necessary. The same cannot be accomplished through piecemeal proposals to rezone residential areas, particularly into major big-box retail centers.

64-3

The types of proposals examined under the two DEIRs- The Commons and Lane Ranch- begin with the assumption that the effects of the projects can indeed be

64-4

mitigated. However, it is doubtful that any of the measures proposed will even remotely mitigate the detrimental effects to the good-faith decisions homeowner have made by relying on City's commitments to land use adopted in the current General Plan. It is simply not reasonable to convert what is now a residential corridor into a major big-box retail strip after the fact; after the citizens of Lancaster have already purchased homes in what they believed would remain primarily a residential neighborhood.

64-4

Mitigation Measures:

The list of mitigation measures is misleading. Code requirements are listed along with supposed project specific mitigation measures. This implies the developer is proposing more voluntary measures than are actually being proposed. Code requirements are mandatory and are not mitigation measures. The community can expect these actions to be implemented regardless of the scope of a project. For example, under Air Quality in Table I-1, AQMD Rule 403 requirements are listed as mitigation, but dust control measures would be required even if this remained a residential zone. Similarly, under Hydrology and Water Quality, NPDES requirements are listed as 'code required', but, again, these are required regardless of the proposed zone change. Even a residential project must file an NOI and SWPPP if the area of the development is over 1 acre. Had this area already been zoned for such big-box commercial use, and if the project were ministerial rather than discretionary, the SRWQCB SWPPP measures would still be in effect and are, therefore, not mitigation measures at all, but code minimums. Also, the list of Best Management Practices (BMPs) is not a list of mitigation measures that do any more than comply with the law.

64-5

If the short-term construction and code required measures are separated from any actual long-term, post-construction mitigation measures specifically proposed for the life project intended to actually mitigate the detrimental effects on the surrounding neighborhoods, there is very little that suggests the project developer is doing little more than describing compliance with various state and local codes. It is not unrealistic to expect a comparison between the mitigation measures proposed for the two projects- The Commons at Quartz Hill and the Draft Environmental Lane Ranch Towne Center Project- and those that would be proposed for a project complying with the requirements of the existing CPD and OP zones at the corner of Ave L and W 60th, or a residential development, without any rezoning. The proposed use is much more intense and alters the character of the local community drastically, yet it is difficult to identify any significant differences in an EIR prepared for a smaller and obviously more compatible project which had been envisioned in the 2020 General Plan.

- Aesthetics

- 2020 General Plan Section 19.1.5(c) requires that "on-site lighting shall create a safe environment, adhering to established crime prevention standards, but shall not result in nuisance levels of light or glare on adjacent properties."
- Title 17, Section 17.12.1030 requires that "lighting fixtures in the parking area...shall be shielded and directed downward onto the site."

64-6

- Agriculture

- No mitigation measures

64-7

- Air Quality

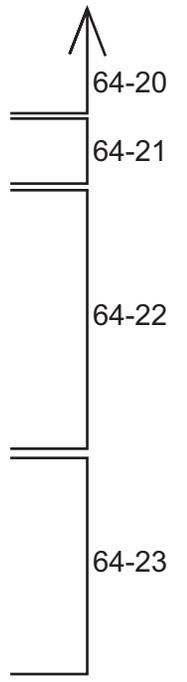
64-8

<ul style="list-style-type: none"> ○ AQMD requirements, Title 8 Chapter 8.16 Lancaster Municipal Code (LMC) requirements, and construction measures 	64-8
<ul style="list-style-type: none"> • Biological Resources <ul style="list-style-type: none"> ○ Construction related measures required by CEQA 	64-9
<ul style="list-style-type: none"> • Cultural Resources <ul style="list-style-type: none"> ○ Required by CEQA 	64-10
<ul style="list-style-type: none"> • Geology and Soils <ul style="list-style-type: none"> ○ Geotechnical investigation is required by the California Building Code (CBC). 	64-11
<ul style="list-style-type: none"> • Hazards and Hazardous Materials <ul style="list-style-type: none"> ○ Title 17 Section 17.12.230(A)(17) requires that “applicants must obtain the approval of the Los Angeles County Fire Department prior to obtaining any city permits for any use which includes the use of hazardous materials or the storage of hazardous materials or wastes.” 	64-12
<ul style="list-style-type: none"> • Hydrology and Water Quality <ul style="list-style-type: none"> ○ Code requirements of the NPDES permit issued by the Regional Water Quality Board. Project-Specific Mitigation Measures are SUSMP post-construction requirements of the NPDES permit and do not rise above code minimums to retain runoff and allow infiltration of pollutants generated from parking lots, loading docks, trash and material storage areas. 	64-13
<ul style="list-style-type: none"> • Land Use Planning <ul style="list-style-type: none"> ○ No mitigation measures 	64-14
<ul style="list-style-type: none"> • Noise <ul style="list-style-type: none"> ○ Short-term construction related mitigations, some required by Municipal Code 	64-15
<ul style="list-style-type: none"> • Population and Housing <ul style="list-style-type: none"> ○ No mitigation measures 	64-16
<ul style="list-style-type: none"> • Public Services – Fire Protection <ul style="list-style-type: none"> ○ Code requirements. Drive clearances, turning radii, distances to hydrants, and fire lanes are all required by code. 	64-17
<ul style="list-style-type: none"> • Public Services – Police Protection <ul style="list-style-type: none"> ○ Title 17.12 Section 17.12.230(A)(11) states that “placement of lighting shall be in accordance with recognized crime prevention, and safety principles.” In addition, the CBC requires minimum illumination of 1 footcandle on exit paths. 	64-18
<ul style="list-style-type: none"> • Public Services - Schools <ul style="list-style-type: none"> ○ No mitigation measures 	
<ul style="list-style-type: none"> • Public Services - Parks <ul style="list-style-type: none"> ○ No mitigation measures 	64-19
<ul style="list-style-type: none"> • Public Services - Library <ul style="list-style-type: none"> ○ No mitigation measures 	
<ul style="list-style-type: none"> • Transportation and Traffic <ul style="list-style-type: none"> ○ 23 measures all described as providing a fair share contribution. There must be a separation between which measures are project specific and which would be required of any developer, residential or commercial. If a residential developer would also be required to contribute a ‘fair share’ to each intersection, then the number of measures listed is misleading. ○ The sheer quantity of measures also suggests that this is a shotgun approach which extends 2 miles north on 60th and east on Ave L. If the 	64-20



proposed project would contribute to traffic congestion to that distance, it is doubtful if the big-box development is at all compatible with the surrounding neighborhoods.

- Utilities - Wastewater
 - No mitigation measures
- Utilities - Water
 - California Plumbing Code (CPC) requires water efficient plumbing fixtures which are included in the EIR as mitigation measures. Again this is misleading. These are required regardless of the scope of the project.
 - Landscaping and irrigation requirements are specified in the City of Lancaster Landscape and Irrigation Design Standards and are therefore required by code and again present a false impression of the number of developer proposed measures.
- Utilities - Solid Waste
 - No mitigation measures
- Utilities - Natural Gas
 - No mitigation measures
- Utilities - Electricity
 - No mitigation measures



Tom Sloan
6029 W Ave K1
Lancaster, CA 93536



Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534



February 17, 2009

Dear Jocelyn,

This is the first time I have ever written a letter such as this, but I feel that I would not be doing my civic duty if I were to keep silent at this time. I have seen the several demonstrations and read the environmental impact reports regarding the building of a Wal-Mart super center at the corner of 60th Street West and Avenue L. Quite frankly, I feel this would be the worst possible place to build any kind of retail establishment, especially a Wal-Mart. The most basic reason for my concern is that a retail store of this kind would very quickly lead to the delinquency of students from Quartz Hill High School and possibly from nearby Joe Walker Middle School. I can foresee kids cutting class to hang out at Wal-Mart and also the very real possibility of drug dealers lying in wait for our children in the parking lot. This is a residential neighborhood, relatively safe, where kids walk to school from several blocks in many directions. The attraction of any large retail store would prove to be too much for many kids and I fear they would never make it to school. I've read of many crimes that take place in and around Wal-Mart centers including mugging, rape, theft and vandalism. As a parent, I strive to keep my children safe from such influences. Allowing Wal-Mart to build a super center at this location would be nothing short of purposely exposing thousands of children to these potential hazards.

65-1

There are, of course, many other reasons pointed out in the environmental impact report that should be mentioned, but my biggest concern is for the safety and well-being of the youth of our community. I hope you will take my concerns to the planning department most earnestly and do not allow Wal-Mart to proceed with its plans to build a super center at this location.

65-2

Sincerely,


Susan L. Davis

Swain, Jocelyn

From: Debby Deskin [debbydeskin@roadrunner.com]
Sent: Thursday, February 19, 2009 7:19 PM
To: Swain, Jocelyn
Subject: Proposed developments at Ave L and 60th Street West

Dear Ms Swain

I am writing to oppose the proposed Walmart and Target developments at 60th Street West and Avenue L.

66-1

**Where did the figures come from regarding traffic at L and 60th?

**Where is the water going to come from for these commercial sites? Please have the figures checked regarding the expected water usage.

66-2

**What about all the empty buildings right now in the city of Lancaster?

Has a study been done to justify more commercial buildings and are there enough potential businesses for these commerical spots? Please check your statistics on this.

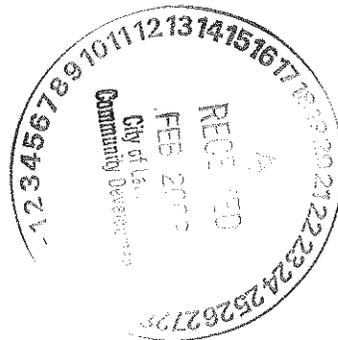
66-3

I understand that the city needs more revenue. But what about the added cost due to crime? Will it be worth it. Please check your statistics on increased crime rates where WalMart and Target supercenters are built.

66-4

Thank you,

William Deskin
42311 Camellia Drive
Quartz Hill, CA 93536



Swain, Jocelyn

From: Crosby, Terry
Sent: Thursday, February 19, 2009 8:20 AM
To: Swain, Jocelyn
Subject: FW: Concerning the Wal-Mart Supercenter

*Terry Crosby
City of Lancaster
tcrosby@cityoflancasterca.org
661-723-6007*

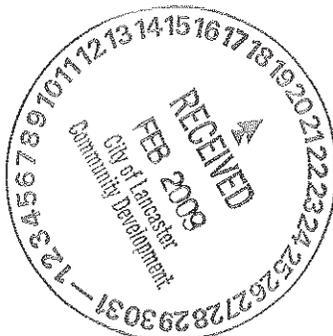
From: Daniel Dominguez [mailto:dandominguez001@yahoo.com]
Sent: Wednesday, February 18, 2009 8:03 PM
To: Crosby, Terry
Subject: Concerning the Wal-Mart Supercenter

As a student presently attending Quartz Hill High School and as a citizen of the Antelope Valley of eighteen years, I implore you to consider the ramifications of allowing a Wal-Mart to be built on the corner of Avenue L and 60th St. West. Simply from visiting the Wal-Mart Supercenters already in the Antelope Valley one can see that the corporation's presence has not had any sort of positive influence. Across the country it can be seen that these stores destroy the small businesses and destroy all alternatives and thus forcing us to shop at these Supercenters. The employees of Wal-Mart are not treated with dignity or respect; the corporation simply sees them as employees and us as consumers. They can't provide the decency and positive environment that small businesses can. Imagine how simple it would be for a student to cross the street and purchase a firearm or cigarettes. Just because students are under the age of twenty-one does not mean that they will not find methods of procuring alcohol and bringing it into the school. Again, from my heart of hearts, the community is relying on the Lancaster City Council to prevent such an atrocity to occur.

67-1

Sincerely,

Daniel Dominguez



Swain, Jocelyn

From: JOSEPH LUTHERN [joelut35@verizon.net]
Sent: Thursday, February 19, 2009 6:41 PM
To: Swain, Jocelyn
Subject: Wal mart/Target Centers

The E.I.R. does not cover the impact on 57th street west from L to L8 what will this street turn into when the Target center is being built and after the completion? It will turn into a freeway.

Thank You, Joe Luthern

68-1



Swain, Jocelyn

From: Amy Nelms [anelms@roadrunner.com]
Sent: Friday, February 20, 2009 11:02 AM
To: Swain, Jocelyn
Subject: Westside Supercenters

Importance: High



Hi Jocelyn,

I am against the Westside Supercenters, because I am a resident of Quartz Hill with these concerns:

1. I drive among hundreds of other parents every weekday morning and afternoon to take and pick up the kids to schools on multiple sides of the 60th West and Avenue L intersection. We attend Sundown Elementary School and Joe Walker Middle School; and within a year, include Quartz Hill High School. We do not need any more driving traffic, nor an increase in pedestrians, at that intersection. 69-1

2. The stores will be an awful distraction for the middle school and the high school students. Those kids will find a way to 'hide out' in the stores. I can also imagine a group of tall, gang-looking males, hanging out in the parking lots as meeting places to sell drugs and stand around smoking. Maybe the parking lots will be great arrest spots for the sheriffs. 69-2

3. We lived on the east side of Lancaster, and then they built the Wal-Mart at the 20th East and Avenue J intersection. There was an increase in car and semi-truck traffic, and there was a helicopter in the sky most nights, looking for shop-lifters leaving the Wal-Mart. Of course, the worst food chain 'restaurants' are built near the bigger stores, and the smell in the air from the food-fryers is disgusting. The night-time lighting outside the store is hideous, especially if you have a 'view'. The amount of trash around the parking lot of the Wal-Mart is unbelievable. The trash covers the nearby chain link fences, and also blows eastward into the next field/housing tract/parking lot. 69-3

4. The prison is gross enough, 50th Street West is marginal, but these major retailers will absolutely turn Quartz Hill into a 'trashy' place to live. As a young high school football player or baseball player, can you imagine practicing and playing across the street from a Wal-Mart? The football/baseball night games might even be lit up by the Wal-Mart parking lot lights. Quartz Hill is barely hanging on, but with the addition of the proposed retailers, I would not hope for any improvement. I would look for the eventual downgrading of Quartz Hill. 69-4

5. There are existing retailers within a 15-minute drive of Quartz Hill. We drive there approximately once a month to pick up cheap household supplies. With the current economy and market, who is going to support more new stores? Lower socioeconomic residents depend on these retailers, therefore with the building of more Supercenters, I would expect an influx of residents who can afford only these types of stores. If these Supercenters drive the local grocery stores out of business, there will be a problem for consumers such as myself. The local Albertsons at least tells you where their produce is from. Wal-Mart sources are a mystery in the fresh food department. Actually, some Wal-Mart processed food is a mystery, too. 69-5

6. There is available national data pre-Wal-Mart, versus post-construction Wal-Mart, but I would hope that this has already been addressed. 69-6

7. One question: With the tax revenue expected from these Supercenters, what will Quartz Hill get? New community buildings? Better paved roads? Smaller classroom size? Art classes in schools? 69-7

Thanks,
Amy Nelms
Quartz Hill resident

February 19, 2009

TO:

Jocelyn Swain, Associate Planner, Environmental
City Of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534

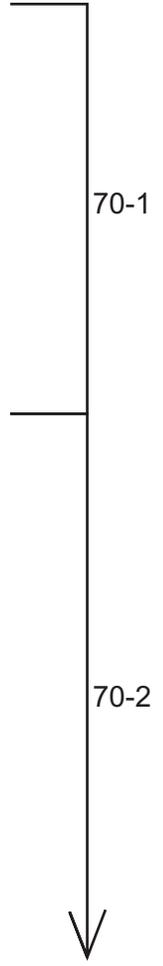


FROM:

Margie L. Smith
4547 W Ave L-12
Quartz Hill, CA 93536
E-Mail: smithtreska@aol.com

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the location of 60th St W & Ave L. 60th St W and Ave K. 60th St W and Ave L-8. I am a second generation native of the west side of Antelope Valley. I have lived here all of my 75 years and have raised my six children. All my children graduated from Quartz Hill High School. Seen my off springs raise their children and grandchildren in the Valley. (still all living here.)

I have read parts of the Draft EIR and do not agree with the traffic and water impact of our community. The ranchers were unable to continue with the Alfalfa growing due to the water table decreasing. This was discovered in the 1930's. My parents owned a alfalfa ranch and lost it to foreclosure in 1937 because it cost too much to pump the water from wells that had to be drilled deeper because the water table at that time was sinking. Where is the water going to come from now??? Over the years it has just gotten worse. More homes have been built and more water usage to the point that Sundown school is installing a pump to create more pressure for the school. More over the homes built on the far



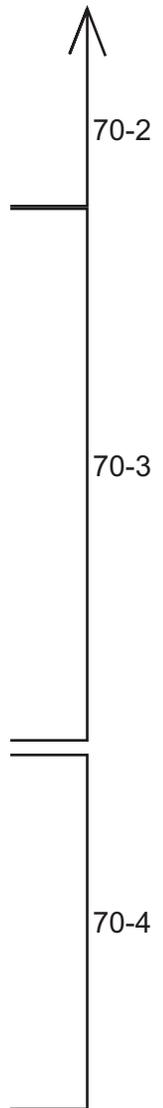
eastside have no water pressure and the homes now occupied are having to arise earlier than necessary to shower before the sprinkler systems go off as the pressure is so low. We are already being told to conserve our domestic water.

I was with the group rallying at 60th and Ave L on the 30th of January and myself counted over 350 cars going south on 60th between 7 & 7:30. Three others were counting the other directions and over 600 cars were going from east to west in that same period. We were there from 6:00 until 8 AM. Traffic has always been bad at both intersections (60th & Ave L & 60th & Ave L-8. More of the students are now driving to and from school, walking and riding bicycles which is a large cause of congestion between the hours of 6:00 & 7:30 AM, 2:00 & 4:00 PM. Plus the families commuting to LA leaving for work around 6:30 AM coming home from 5:00 PM.

We do not need Big Box store in that area, or for that fact in Quartz Hill. The small business we have would be unable to stay open. We would also lose the large chains we now have in our area. Which include Albertson's, Von's, and Stater Bro's. I for one do not mind driving a few extra miles to do my shopping. They are close enough and far enough to be convenient. With the cars we have now mileage is not a problem

Thank You

Margie L. Smith



Swain, Jocelyn

From: Loretta Berry [quartzhillcares@yahoo.com]
Sent: Monday, February 23, 2009 4:35 PM
To: Swain, Jocelyn
Subject: 60th West/Ave. L DEIR's
Attachments: February 23 DEIR's 60th-L.doc

February 23, 2009

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Email: jswain@cityoflancasterca.org



FROM: Dennis and Loretta Berry
4815 West Avenue L-2
Quartz Hill, CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of the two (2) proposed projects on 60th Street West and Avenue L. I have reviewed the Draft Environmental Impact Report's (DEIR's) and have found several aspects for which I believe the supporting data or analysis is in error. I consider these deficiencies to significantly affect the conclusions drawn in the DEIR's and therefore refute the applicability of the DEIR's for assessing the impact of the proposed project to the environment and the community.

I am providing twenty-three (23) comments as an attachment. Given more time, I could come up with many more objections with these two (2) DEIR's. I request that these concerns be kept on record as public comment to the DEIR and that they be addressed before any decision is made to approve the proposed re-zoning.

71-1

Regards,

Loretta Berry
661-943-7650

Obviously, most of what I have to say is repetitive at this point, but the need to send written comment is needed just the same.

As I said on Wednesday, Feb. 18, at the Planning Commission hearing, 45 months would NOT be long enough to find all the fallacies of these two DEIR's. This is comment on both of them, as I noticed most of the statements made were copied and pasted to both.

#1 The traffic studies are completely inadequate and do NOT speak the truth about the amount of current or proposed traffic in this area. On several occasions we were out at the intersection of 60th West and Avenue L (as well as 60th and L-8) and we counted over 1300 vehicles in a two-hour period. We have pictures (they can be provided) of traffic backed up in all directions for more than 1/2 mile at any given time.

The traffic studies did NOT include traffic, pedestrian traffic or bicycle traffic, both of which are very pronounced and will be affected, especially by Sundown Elementary and Joe Walker Jr. High.

The traffic studies do NOT include where the flow of traffic will be diverted ie; into and through existing housing tracts, to avoid the traffic congestion of this major intersection.

The traffic studies do NOT include how the flow of traffic into and through existing housing tracts in order to avoid the traffic congestion of this major intersection, will affect home owners in these tracts.

When were the traffic studies at the intersections in this DEIR's done? If they were not done between 6:00a.m. and 8:00a.m. on a week day/school day, or from 3:30p.m. and 7:30 p.m. on a week day/ school day, then they are inadequate and inaccurate and MUST be redone.

No where in these DEIR's was the safety of our school children mentioned. And yes, this is an environmental by-product of these proposed projects.

#2 The statement that building these centers will in fact IMPROVE the air quality of the Valley because Quartz Hill/west side residents will not have to travel five whole miles away to go shopping is a JOKE! The air quality out here will be severely impacted with all the extra added congestion of service vehicles, delivery trucks, transport trucks, big rigs, trash trucks, public safety vehicles, etc. Please do NOT insult our intelligence with this dribble. The air quality report is inaccurate and inadequate and MUST be redone.

#3 Public services- Fire. It says right in these DEIR's that the LACFD REQUIRES that a fire department be within one (1) mile of these shopping centers. Then it states that the nearest station #84, is 1.8 miles away!



The DEIR's go on to say many things about fire safety, all of which MUST be re-addressed. To say that rescue vehicles will not be impacted in their travels through this area, mostly two-lane roads, is another inaccurate statement.

71-9

#4 Public services- Police. The DEIR's state that the Lancaster Sheriff's Station is six (6) miles away. This is completely inaccurate, as it is well over ten (10) miles away on Sierra Highway. Again, with false statements like this, there is no telling how many other false statements there are throughout these reports.

71-10

The DEIR's state that there "could" be an increase in crime in the community surrounding these proposed projects. Are you serious? There MOST DEFINATELY will be an increase in crime and these FACTS are well documented in EVERY case where a big-box type center went into a small town! How can the public or the Planning Department take these DEIR's seriously when they are full of documentable holes?

71-11

The DEIR's state that the Lanc. Sheriff's station's current response time out to the west side is 5.5 minutes. Where is the documentation and proof of this? We who live out here know that is another fallacy. And it goes on to say that this response time will in no way be affected by these supercenters being built. Did they not just put in a police sub-station at the Eastside Walmart because of the increase in crime?

71-12

No where in these DEIR's did it discuss the fact that Walmart allows campers (transients) to camp out in their parking lots. Next to a school? Three (3) schools? Are you kidding me? This is what our city leaders want for our school children? You may not think this is an Environmental issue, but by God it surely is. The environment our kids will be in and MUST be addressed.

71-13

#5 The DEIR's have inconsistent remarks and declarations concerning any historical significance of this site.

Has any authoritative bodies been called in to research this area? The West Antelope Valley Historical Society? What about an archeologist? We (the Antelope Valley) have already witnessed the razing of a very historically significant building, the Rowell adobe house, in Lancaster. Do NOT make this same mistake again, of dismissing our local history to build an unwanted, unneeded shopping center.

71-14

#6 There were buildings and other life on this property (NW corner) before it was razed. The DEIR's DO NOT address the historical significance of those buildings. The historical significance of the Lane Ranch is NOT addressed in the DEIR. The Lane's are founders of the west side and Quartz Hill. The desecration of their ranch would be an injustice to not only the QH community but the entire Antelope Valley (as was the desecration of the Rowell adobe house).

71-15

#7 This DEIR does not recognize the fact the Native American Indians lived here in the AV in particular on the west end of the Valley. It failed to recognize the impact of the present day Native Americans who live and reside here as well as attend school at either Sundown

71-16

Elementary (within 2 miles of the proposed sites) and/or Quartz Hill High School and Joe Walker Jr. High. Quartz Hill High School is a historical resource as per the definition in Definition of Impacts. It is important for scientific, historical and religious reasons to cultures, communities, groups, or individuals and also is important in the traditions of a society.

5.2 Definition of Impacts states:

The CEQA requires consideration of project impacts on archeological or historical sites deemed to be historical resources. If the project will cause a substantial adverse change in the characteristics of a resource that convey its significance or justify or justify its eligibility for inclusion in the California Register, or a local register, either through demolition, destruction, relocation, alteration or other means, then the project is judged to have a significant effect on the environment according to the CEQA guidelines (Title 14, California Code of Regulations [CCR], Chapter 3).

Historical resources are places or objects that are important for scientific, historical and religious reasons to cultures, communities, groups, or individuals. Historical resources may include archeological sites, architectural remains, and other artifacts that provide evidence of past human activity. Historical resources can also include places of importance in the traditions of a society. To determine impacts to historical resources, it is necessary to assess the significance of resources and the effects of the project on their significance. The significance of resources in the project area is based on their importance to scientific-historic research, their importance to Native Americans, and their educational and community value for the general public.

Section 15064.5 of the CEQA guidelines pertains to the determination of the significance of impacts to archeological and historic resources. Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation.

Direct impacts may occur by:

- Physically damaging, destroying, or altering all or part of the resource;
- Altering characteristics of the surrounding environment that contribute to the resources significance;
- Neglecting the resource to the extent that it deteriorates or is destroyed; or
- The incidental discovery of cultural resources without proper notification.

Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources. Due to their nature, indirect impacts are much harder to assess and quantify.

#8 The historical and academic aspects of Quartz Hill High School have NOT been addressed in this DEIR. Where are the studies done that show the impact of a shopping center within 1 mile of one of the most prestigious high schools in the state?

Quartz Hill High School is a public, co-educational high school previously located in Quartz Hill, California. Founded in 1964, it is the third oldest comprehensive high school in the Antelope Valley Union High School District. Quartz Hill High School is consistently ranked as the top school in its district and one of the top schools in the state according to the Academic Performance Index. Quartz Hill High School is one of 65 high schools in California to offer the International Baccalaureate (IB) Diploma Program, which began at the school in 1998. Advanced Placement (AP) classes are also available in nearly all academic departments. Quartz Hill High School is the only school in the district to have a student receive a perfect score on the SATs.

71-17

Quartz Hill High cannot continue to thrive and succeed in the level of quality education described here with the distraction and terrible influences that this project would bring to the immediate neighborhood and that these influences could not help but spew onto the Quartz Hill High School campus.

The impact on the learning environment and the very rural country lifestyle that Quartz Hill High School enjoys has to be fully investigated and considered before any meaningful EIR can be produced.

#9 Alternative 1 states that if the site remains undeveloped that it “would continue to be vulnerable to dumping.” This needs to be addressed, because the entire Antelope Valley is a desert and is vulnerable to dumping.

71-18

#10 Alternative 2 states that this land is currently zoned for urban residential with the sentence added “intended to provide for single-family dwellings in an urban environment with full urban services.” As an urban community we have all the urban services we need and/or want, even more, within a five-mile radius. These shopping centers, as well as the 70+ downtown Quartz Hill businesses, were not addressed in the EIR. Several things NEED to be addressed. First, the EIR states that the residents who live out here need shopping centers provided for their commute home. With the major commute coming from the Antelope Valley freeway, there already is existing shopping. On Avenue K between 10th Street West and 60th Street West (the proposed site) there are at least five (5) major shopping centers, including a brand new Lowe’s, and dozens of strip malls. On Avenue L between 10th and 60 West there are at least five(5) major shopping centers and dozens of strip malls. On Avenue J between 10th and 60th there are at least six (6) major shopping centers, including a Super Walmart and Home Depot, and dozens of strip malls. Second, in ALL of these existing shopping centers and strip malls there is an overwhelming number of vacant storefronts (pictures have been taken and can be provided). This MUST be addressed in the City planning. To add more sprawl while there is much existing blight now is NOT “economically sustainable” as suggested in the Environmentally Superior Alternative section.

71-19

It is also NOT mentioned that there is already adequate hardware store shopping in this area. DeWolfe Hardware and Lumber, who has served this area for more than 50 years, is less than

71-20

two (2) miles away. Home Depot is less than four (4) miles away as well as a brand new Lowe's, less than 5 miles away. SATURATION and BLIGHT MUST be addressed in the DEIR. Nor was it mentioned that H & E Home Builders Supply, less than 5 miles away, recently went out of business and that building is still standing empty, creating blight.

71-20

#11 "The proposed project would not result in a cumulative noise impact (traffic)." Are you serious? As discussed previously, this is currently an undeveloped piece of property. To add a shopping center the size of the one proposed would NOT result in any more noise? Where is the study on this? Undeveloped land with a few houses vs. major shopping center with a Super Walmart, Target, Home Depot, gas stations/mini-marts and eight other buildings for retail and fast food. This MUST be readdressed.

71-21

#12 I do not see Valley Fever mentioned in the construction stage of this project in this DEIR. With over 35,000 new cases per year in California alone, this MUST be included in this EIR.

- Valley fever is an emerging and sometimes deadly fungus infection.
- The valley fever fungus lives in soil and is spread through the air.
- Farmers, construction workers, and others who engage in activities that disturb the soil are at highest risk for valley fever. People with weak immune systems and persons of certain racial groups can become seriously ill from the infection.
- Valley fever is treatable with fungus-killing medicines.
- Persons at risk for valley fever should avoid exposure to dust and dry soil in areas where valley fever is common.

What is valley fever?

Valley fever is another name for the sometimes deadly infection coccidioidomycosis. It is called valley fever because the organism that causes it is commonly found in the soil of the southwestern United States, Mexico, and parts of Central and South America.

Valley fever usually affects the lungs. When it affects other parts of the body, it is called disseminated valley fever.

71-22

What is the infectious agent that causes valley fever?

Valley fever is caused by *Coccidioides immitis*, a fungus. The fungus produces spores that can be inhaled when they get into the air. Spores are hardy forms of the fungus that can live for a long time in harsh environmental conditions such as heat, cold, and drought.

Where is valley fever found?

The valley fever fungus grows naturally in soil in the southwestern United States and in parts of Central and South America.

How do people get valley fever?

Valley fever is spread through the air. If soil containing the valley fever fungus is disturbed by construction, natural disasters, or wind, the fungus spores get into the air. People can breathe in the spores and get valley fever. The disease is not spread from person to person.

What are the signs and symptoms of valley fever?

About 60% of infected persons have no symptoms. The rest develop flu-like symptoms that can last for a month and tiredness that can sometimes last for longer than a few weeks. A small percentage of infected persons (<1%) can develop disease that spreads outside the lungs to the

brain, bone, and skin (disseminated disease). Without proper treatment, valley fever can lead to severe pneumonia, meningitis, and even death.

How is valley fever diagnosed?

Valley fever is diagnosed with a blood test or culture.

Who is at risk for valley fever?

Anyone can get valley fever, but people who engage in activities that disturb the soil are at increased risk. They include:

- Farmers
- Construction workers
- Military personnel
- Archaeologists

People with weakened immune systems are at increased risk for disseminated disease. HIV infection, as well as medical advances like chemotherapy and organ transplants, cripple the immune system and weaken resistance to fungus infections. Others at increased risk for disseminated disease are: elderly persons, African-Americans, Asians, and women in the third trimester of pregnancy.

What is the treatment for valley fever?

Valley fever can usually be treated with fungus-killing medicines.

How common is valley fever?

An estimated 50,000 to 100,000 persons develop symptoms of valley fever each year in the United States, with 35,000 new infections per year in California alone. In Arizona, the incidence of reported cases was 15 per 100,000 in 1995.

Is valley fever an emerging infectious disease?

Yes. Valley fever is on the rise because of the growing number of people who are moving to areas where the disease is common (such as Arizona) and increases in the number of persons with weakened immune systems.

Recent natural disasters have also triggered a rise in valley fever cases. The central valley of Southern California had a 4-year epidemic of valley fever in the early 1990s after a severe drought. Cases of valley fever also increased in persons exposed to billowing dust released by the January 1994 earthquake in Northridge, California.

How can valley fever be prevented?

There is no vaccine against valley fever. Persons at risk for valley fever should avoid exposure to dust and dry soil in areas where valley fever is common.

#13 The DEIR states that the proposed project would cause no significant impact to public services. This is inaccurate. The Antelope Valley Sheriff's Station is ALREADY under staffed and inadequate for the population of the AV. There is plenty of data available, including walmartcrimereport.com, siting the increased crime when a big-box store is built. Where is the study of a typical response time out to the QH area? One person at the Sheriff's station saying that there will be no need for added public services is inadequate and inaccurate.

#14 Crime is a HUGE issue and was NOT addressed adequately in this DEIR. Along with the above, lack of police power and other public utilities, the fact that crime rates go up when big-box stores are put in was not addressed in this DEIR. There is plenty of proof of this and it MUST be addressed.

71-22

71-23

71-24

Now, a new study of official police reports proves how serious the issue crime of crime at Wal-Mart stores still is for many towns and cities across America. The shocking new report, titled “Is Your Wal-Mart Safe?” is first national study to analyze official police reports of incidents at 551 Wal-Mart stores, as well as compare rates of criminal/police incidents at Wal-Mart and Target stores.

Among the findings of the “Is Your Wal-Mart Safe” study are:

- Wal-Mart stores analyzed do experience a high rate of criminal/police incidents;
- Based on a sample of “high incident” Wal-Mart stores, Wal-Mart stores experience a much higher rate of reported criminal/police incidents than nearby Target stores;
- National estimates indicate that almost 1 million criminal/police incidents occurred at Wal-Mart stores in 2004 – or 2 criminal/police incidents per minute in 2004;
- Wal-Mart could implement roving security patrols at all stores nation-wide at an estimated cost of 4 cents a customer visit.

71-24

#14 Water- There is already a water shortage in California and the Mojave Desert. There are headlines in the newspaper everyday (they can be supplied) that the water shortage is critical. Sundown School, less than two (2) miles away is already experiencing low water pressure as well as the housing tract on Avenue I and 90th Street West. Again sustainable, smart planning? This MUST be addressed. In this EIR there is one water agency, and this is not even the correct one, stating that there will be enough water. Let’s see the data.

71-25

#15 The safety, welfare and health of our local school children was NOT addressed in this DEIR.. There are numerous reports citing child obesity and yet the City supports putting in fast-food joints next to schools. This MUST be addressed.

71-26

#16 The City of Lancaster has gone on record and in fact it is stated in this DEIR that this shopping center will generate revenue for the City of Lancaster. Our “leaders” MUST stop filling citizens’ heads with this nonsense. This is a total and proven lie. There will be no MORE revenue generated, it will only be redirected. This can be proven and MUST be included in this DEIR.

71-27

#17 The same goes for “creating more jobs.” There may be a few more construction jobs created, but most of these will probably from out of town firms and won’t last for long. Retail jobs will NOT be increased due to these added shopping centers. Again, they will only redistribute workers from the other local stores. If you truly want to add new jobs in this Valley build a Community Center, trade school, or something similar that would actually add VALUE to our community. Again, these statements made by the City and included in this DEIR MUST be re-evaluated and addressed with proof.

71-28

#18 HORNED OWLS – The homeowners and community members in the area sited and recorded seeing horned owls and their nests in the large trees that were on the 60th West/Ave K property. Pictures were taken and submitted to the City of Lancaster for consideration. A week later these huge and majestic trees, along with the horned owl nests, were not only cut down, but any trace was completely removed from the site. This was never again, addressed by the City,

71-29

nor is it part of this DEIR. This is a serious matter and MUST be addressed, along with any other species or plants or animals on the site. If there were Horned Owl nests one (1) mile away, there is enough reason to believe there were and are some on these two sites (NW & SE corners).

71-29

#19 Other wildlife species. The DEIR's did NOT supply an adequate study of the wildlife species in these areas. There is no way in heck, you can tell us that there is NO wildlife on the Lane Ranch that will be affected. There already has been wildlife habitats affected on the NW corner when the property was razed a couple years ago. That was swept under the rug at the time and we WILL NOT let it be done again. This has NOT been adequately addressed and needs to be redone.

71-30

#20 Conditional use Permit –“the proposed commercial development must be needed...” This commercial development is NOT needed or wanted in this community. It is the responsibility of the City and this DEIR to prepare the FACTS accordingly. The FACTS remain...un-needed and un-wanted.

71-31

#21 Urban decay and blight were NOT adequately addressed in these two DEIR's. I gave a count of the empty storefronts within a five (5) mile radius of these sites. Until these empty storefronts are addressed, these new mega-shopping centers should NOT even be considered. Pictures of all the empty storefronts can be supplied. The Planning Commission MUST look up the definition as well as the statistics on urban blight and decay, before moving forward.

71-32

#22 Retail over-saturation was NOT addressed in these DEIR's. How many Walmarts and Targets, Home Depots and Lowe's do two small towns need? As much as Lancaster and Palmdale would like to be “in the big leagues,” we ARE small towns and building more unwanted, ugly, soon-to-be-empty shopping centers is NOT the answer to becoming “somebody.” Try as you may, this CANNOT be ignored or overlooked and MUST be addressed in the DEIR's.

71-33

#23 I nearly forgot. I remember reading in the DEIR's that there would be “no significant increase” in the smells (odors) that several fast-foods joints on each corner of these proposed sites, would create. NO significant increase in odors? From basically two empty lots to several fast-food joints, no increase in odors?!? The DEIR's also stated that the smells (odors) generated would be no more than the average household in the area! Again, I beg the City not to insult our intelligence. The average household does NOT operate hot oil fry tanks 24 hours, 7 days a week. This is an incredible fallacy and MUST be revisited.

71-34

Charles J. Conterno
6002 Country Lane
Quartz Hill, CA 93536
February 20, 2009

Attn. Jocelin Swain, Assistant Planner – Environmental
Lancaster City Hall
44933 North Fern Avenue,
Lancaster, CA 93534



Re: Proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere we have here.

72-1

I have many concerns, and most are related to the EIR. First, I'll refer to traffic and statements from page VI 7. Development of this project would generate 13,683 new daily trips. After 20 years of experiencing Quartz Hill high school traffic and the traffic on Country Lane Estates side streets, I must stress that this will create both an environmental and safety hazard. I think an environmental report on this entire neighborhood, including the side streets that are used by the drivers going to and coming home from school should be done. The issue of safety for students and neighborhood children goes on and on, and the possibility of serious injury or death with traffic increasing during school hours must not be ignored.

72-2

My next concern involves noise. The report on page VI 6 states that there will be no impact associated with noise. Students gathering and hanging out and playing loud music in the future parking lots will add to the noise that will be created by the increased traffic. These effects will most certainly disturb the peace.

72-3

Of course more people means more crime, both at the retail locations as well as in our surrounding neighborhood. Students gathering will inevitably bring bad results. Tobacco use, alcohol, drugs and fighting are often connected with the gathering of unsupervised students. Hardend criminals and

72-4

predators will also find new targets in these locations. Can Walmart's parking lot security deal with these serious concerns? I do not think so! Additionally, Walmart's policy of permitting motor homes and campers to camp out on their property is a very bad idea for a residential neighborhood as well as for a high school directly across from the parking lot. Rising crime rates pose a danger to the neighborhood and students. All efforts possible should be made to protect these community members. Obviously, local police will need to be even more vigilant than they are now. How can one take seriously the statement of page VI 6 concerning police protection that reads, "This alternative will not result in the need for more police protection"?

72-4

Also, I am very concerned about the trash that will be generated by these proposed projects. Plastic bags, fast food wrappers, paper, etc. will blow into the local fields creating not only an eyesore, but also health and environmental hazards.

72-5

Another concern is the blight that these proposed projects will add to, that already exists here in the Lancaster area. Many small businesses will be affected, and possibly closed down leaving more empty buildings. Aren't there already enough of these in Lancaster? Economic forecasts do not look good for the economy. Houses are not being built or sold. People are losing their jobs and being foreclosed on which is leaving many empty homes. An environmental impact report should be made concerning this large number of empty buildings

72-6

Lancaster must refocus on and redevelop what already exists. Perhaps ideas that will help families and children will be more beneficial than adding to the "ghost town" effects that are visible on our main streets.

Sincerely,



Charles J. Conterno

February 20, 2009

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Email: jswain@cityoflanasterca.org



FROM: Bob Curry
4757 West Avenue K-12
Lancaster, CA

SUBJECT: Comments to Draft EIR for 'Lane Ranch Towne Center'

City of Lancaster,

I am writing this letter to oppose the DEIR for the proposed project entitled: 'Lane Ranch Towne Center'. I have reviewed the Draft Environmental Impact Report (DEIR) and have found several aspects for which I believe the supporting data or analysis is in error. I consider these deficiencies to significantly affect the conclusions drawn in the DEIR and therefore refute the applicability of the DEIR for assessing the impact of the proposed project to the environment and the community.

I am providing eleven (11) comments as attachments. I request that these concerns be kept on record as public comment to the DEIR and that they be addressed before any decision is made to approve the EIR.

73-1

Regards,

Robert E. Curry

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 1 – Lack of data to support analysis of urban decay impacts.

Ref: IV B and Appendix M

The DEIR draws many conclusions regarding the potential impact to conditions based on projections of the market demand in the vicinity of the project. There is a complete lack of supporting data to justify the proposed growth rate in the body of the main document. Projected growth is defined for the period from 2007 – 2012 which implies that the analysis was conducted prior to 2007. It is now 2009 and it is well known that market conditions have changed in ways that are inconsistent with the trend analysis.

73-2

Appendix M, which portends to provide supporting data and analysis on this topic is dated October 2007. In the last 6 months, the national economy has seen greater disturbance than it has seen in eighty years. Any trend analysis that was conducted prior to the last 6 months cannot be useful for projecting the availability of market demand to support this project. Clearly the current DEIR does not have sufficiently current information to make an informed decision regarding the future viability of these projects and the potential for massive urban decay that this project could impose on the area.

Proposed Mitigation

The EIR must account for the current status and knowledge of the local and national economy in its determination of trends for the subject area.

The EIR should project a full range of future scenarios (including severe recession and depression) and analyze the outlook for urban decay and other EIR topics under these circumstances.

All sections of the EIR that utilize population and housing trend data must be updated as well.

73-3

No action should be taken on this project until this analysis is brought up to date and confidence in sufficient market demand under the full range of potential economic and housing outlook can be supported with data.

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 2 – Aesthetics

Ref:
Section IV B

I disagree with the DEIR conclusion that the proposed project
"would have a less than significant impact with regard to visual character"

The DEIR proposes that aesthetic characteristics are 'subjective' in nature, but there is clear evidence to support the argument that the aesthetic impact would be negative.

The DEIR shows illustrations of a retail center that is similar to those found in many areas of suburban California, but not like anything found in the unincorporated vicinity of Quartz Hill. The clear implication is that the residents in the Quartz Hill area have chosen to live and invest in an area that does not include such structures. The current homeowners purchased their property understanding that the development site is not zoned to allow construction of a large retail facility. Property values in Quartz Hill and the West side of Lancaster are higher than the average for Antelope Valley. It may be inferred that the existing aesthetic situation may have substantial fiscal value for the homeowners which could be lost due to the re-zoning action.

The fact that a substantial community effort is underway to block development of this project and all similar 'big-box' buildings in the community is further tangible proof that the local community considers the aesthetic effects to be negative.

Proposed mitigation:

The DEIR should be re-written to characterize the aesthetic effect of the proposed design to be a negative impact.

The developers should re-plan for a design that is consistent in size and architectural style with retail buildings that have been present in Quartz Hill for more than 10 years.

73-4

73-5

73-6

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 3 – Poor assumptions in urban decay analysis

p.6 of Appendix M

The DEIR, Appendix M makes the assumption that the anchor tenants can be trusted to avoid constructing this project if it were to result in significant loss of sales to other stores of the same chain.

“If the two projects draw sales from other establishments it is likely that this “cannibalization” by the anchor tenants will largely come from their own existing stores. Presumably, this potential loss in sales has already been considered in the decisions by the major department store chains to locate additional new stores in the Lancaster market.”

In reality a corporation may indeed have financial motives that could encourage building beyond the local market capacity even if it takes business from other stores within the chain. Although such motives might be strategically advantageous to the corporation, the end result would be a detrimental impact to the community in terms of loss of jobs, degradation and even abandonment of existing facilities. In addition to urban decay, overbuilding of retail facilities brings many other environmental impacts such as costly and unnecessary infrastructure that would have to be maintained by the taxpayers. Other big box chains in the valley have followed this pattern by building new facilities that have displaced the market for their own predecessor facilities. The proposed Wal-Mart is a short drive from an existing Wal-Mart along a well-traveled commuter route. The situation appears ripe to generate decaying and eventually abandoned property.

We cannot trust the anchor tenant corporations to act responsibly for the well being of the community in this regard.

73-7

Proposed resolution:

An independent analysis of the market viability, not only of the stores in the current project, but also all other related facilities of the same chains.

73-8

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 4 – Incomplete analysis of the existing and competitive retail market

Ref: Section IV C of Appendix M

Section C is entitled 'Existing and Competitive Retail'; however, it appears to make no mention of the existing retail stores in downtown Quartz Hill, 50th Street West area. This seems to show the bias of the analysts toward large scale, chain oriented retail facilities. In reality the impact to the small business should be of paramount interest for this EIR. Small businesses are relatively more susceptible to market challenges if for no other reason than their inability to draw from large corporate reserves. Furthermore, in this case, the small businesses are existing businesses that are currently employing citizens while most of the other competing stores considered in the analysis are only proposals.

73-9

Proposed Mitigation:

Re-evaluate the Appendix L analysis with the inclusion of the existing retail stores in Quartz Hill.

73-10

Indicate which small businesses will receive competition from the proposed project and what number of lost jobs can be expected.

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 5 – Insufficient analysis to determine impact to achievement of the air quality plan

Ref: IV D Air Quality, 'Air Quality Plan Consistency'

The DEIR provides a trivial analysis of the potential of the project to impact achievement of goals established in the Air Quality Plan. The primary argument appears to rely on the concept that by providing local retail there will be fewer automobile trips in the area. This argument is weak and unsupported. As the DEIR recognizes, the area is a commuter community. There are existing retail facilities that provide all of the goods and services in the proposed project within a few blocks of the primary commuter route used by the local residents. There is currently no need to generate additional trips 'into town' to reach fast food or discount retail stores. A far more negative impact on air quality will result from building a massive retail facility that may be underutilized or lead to the underutilization of existing facilities. As mentioned on prior comments, there is out-of-date and insufficient data to provide confidence that market demand will support these projects. The net impact on air quality due to building unnecessary big box stores would be significant and negative.

73-11

Proposed Resolution:

The EIR must fully analyze the impact of adding emissions from an additional facility in comparison to simply expanding use of existing facilities.

73-12

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 6 – Incorrect conclusion regarding impact relative to CARB
Greenhouse Gas Emissions goals.

Ref: IV D

The DEIR indicates that the project could generate up to 16,417 metric tons of CO₂e/yr. It also notes that California's state goal for reduction of greenhouse gasses is 174 million metric tons/yr. The emissions of the project relative to the state goal are computed to be 0.045 percent of the state goal. The DEIR claims that "it is not possible to predict the specific impact . . . from the relatively small incremental increase".

To begin with, it should be noted that this increment; however, small is a positive increment and as such will increase the greenhouse gas emissions at a time when we must decrease emissions in order to reach the CARB goal.

Furthermore, it is possible to assess the impact to the CARB goal by comparing the increment in association with the percentage of the state population to be served by the new facility to determine whether this increase on a per capita basis is reasonable compared to the emissions goal.

When compared to the relative percentage of the state population that would be served by the proposed project, the value of 16.4 kT/yr is large. The AB32 goal is that the total California emissions will be 427 MMT/yr CO₂e (600-173MMT/yr) As a result, the 16.4kMT/yr generated by the proposed project will account for .0038% of the total emissions of California. If the proposed center serves 10,000 persons, then that represents only .0274 % of the population of California and so the new emissions produced by this project will account for 13% (.0038 / .0274) of the allotment of CO₂e emissions for each patron.

In other words, the proposed project would cut into each person's CO₂e emissions budget by 13% just to meet a handful of their retail needs. Considering all of the other requirements and priorities for life which result in CO₂ emissions, and considering that we are currently exceeding our target CO₂ budget, clearly adding another source of emissions for a shopping center is inconsistent with meeting the California AB32 goal. (in addition, it is also interesting to note that the combined emissions from the 3 pending big box development proposals would appear to create 46% of each patrons carbon budget)

73-13

73-14

Comment #6 cont.

Proposed resolution:

The EIR should indicate that the project is not consistent with meeting the California CO₂e emissions goals as stated in AB32.

The proposed project should be redesigned to reduce greenhouse gas emissions or offset the effects of its operation through associated projects or be reduced in scope. The approach should be defined in the final EIR and a system of controls implemented to insure that these mitigations are supported through the life of the project.

73-15

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 7 – Inadequate planning to address hydrology issues

Ref: IV I

The DEIR does not provide sufficient planning or detail to insure that the proposed project will not induce significant hydrologic problems. The plan calls for covering a massive section of desert with impervious concrete. Localized flooding from rainwater runoff has been a serious issue in the close vicinity to the proposed development site and in recent years has resulted in significant damage to homes and displacement of residents. These past problems occurred despite planning and mitigation efforts. As such there is no assurance that an adequate solution can be developed and if it is developed whether it can be afforded within the scope of the project. In the past, mistakes made in adequate planning for rainwater runoff have been passed on to the taxpayers, generally after local residents were subjected to hardships.

73-16

The City's Master Plan of Drainage includes a funding process to deal with water runoff issues; however, the large non-porous surfaces proposed by the new development are drastically different than the porosity ratio that would be expected in the current residential zoning classification. There should be no confidence that the City's drainage plan can accommodate such a significant change in surface porosity.

Proposed mitigation:

Include a comprehensive hydrology study of the development site and surrounding area using models and tools that have been validated for the local area. Develop a suitable design to avert any issues related to runoff and local flooding. Show that the project has adequate funds to implement the design and to incorporate modifications at a later date if deficiencies in the design are found after construction.

73-17

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 8 – Unclear determination of projected baseline

Ref: Section IV D Air Quality

The DEIR frequently identifies data as 'Future (2012)' and this is used as a baseline for determining the impact due to the project. It is not clearly stated how this projected, no-project, data was developed. The appendix related to the Air Quality segment of the DEIR provides no additional insight to the analysis process. In the case of air quality, it is critical to know whether this baseline includes the expected effects of numerous other development projects that are pending approval. In particular, there are two additional large retail centers under consideration at this time. The worst case situation must be considered in which all projects are approved.

73-18

Proposed Resolution

The EIR must clearly state how the projected baseline was calculated.

The EIR must present an analysis of the air quality worst case scenario in which all proposed development projects are approved.

The EIR must also present the percentage increase in air quality impacts from the current existing condition and the worst case air quality situation which includes the proposed project and all related projects (pending or under development)

73-19

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 9 – Unclear presentation of emissions increase

Ref: Section IV D Air Quality

The DEIR assess the significance of features such as Carbon Monoxide (CO) with respect to various standards. It does not present the absolute increase in emissions as a percentage increase from existing conditions. For example, by comparison of Tables IV D-4 and IV D-11, many of the intersections that were analyzed show an increase in CO concentration of over 50% from existing conditions.

73-20

Proposed Resolution

Discuss the incremental increase in CO concentration and other emissions as percentage increases over the existing conditions in order to allow easy assessment of the impact of the proposed development.

73-21

Comments to Draft Environmental Impact Report for
'Lane Ranch Towne Center'
Submitted by Bob Curry

Comment # 10 – Cargo traffic

Ref: Appendix N

The analysis of traffic flow did not appear to account for the increase in road usage by truck traffic that would be necessary to supply and maintain a large shopping center complex. These vehicles can be expected to have a disproportionately large effect on traffic flow, delays at both intersections and on road segments. The project can be conservatively expected to generate up to 10 truck pass-bys in any given day-time hour (ref: related DEIR). Clearly, having a semi-tractor trailer enter the area every 6 minutes will have important impacts to traffic flow. Why was this not included in the analysis of traffic flow and delays?

Because this cargo traffic will typically enter the area from the I-14 Freeway, the effects of truck travel between the freeway and the proposed development site must be analyzed.

73-22

A thorough analysis of the additional traffic impact associated with cargo transportation into the shopping complex must be conducted.

The traffic study must also be extended beyond the limited region shown in the DEIR to include truck routes between the freeway and the development site.

73-23

Comments to Draft Environmental Impact Report for
 'Lane Ranch Towne Center'
 Submitted by Bob Curry

Comment # 11 Traffic Impacts not correctly characterized

Ref: Section IV N Transportation

The analysis of traffic conditions provided by the DEIR contains many assumptions regarding future growth, other pending development projects and congestion standards that fail to illustrate the actual impact to be expected from the proposed project.

The analysis is built up from an analysis of existing conditions, then with the addition of ambient growth, then with the addition of other 'related projects', then with the addition of the proposed project and finally with the effects of the proposed mitigation measures. A detailed look at the data shows generally that ambient growth has little effect, but the 'related projects' have an enormous impact on traffic. The addition of the current project is significant as well. It is not possible from the data provided to determine the effects of 'the Commons' alone on the existing or ambient growth scenarios. While the mitigation measures appear to reduce congestion relative to the inclusion of the current project, the mitigations do not come close to restoring the current situations.

For example, look at the 60th and Ave L intersection weekend data set:

Data from Tables IV N-3,7,8,9,13

60 th and Ave L, weekend	ICU	% increase from 'existing + ambient'	LOS
Existing	.453	-9	A
Existing + Ambient growth	.481	0	A
Existing + Ambient + Rel Projs	1.268	164	F
Existing + Ambient + Rel Projs + Current Proj	1.725	259	F
Existing + Ambient + Rel Projs + Current Proj + Mitigations	1.211	152	F

In this example, it is clear that the big box retail centers will cause an enormous impact to traffic conditions in the area. The ICU values increase by over 200% and the mitigations only have the effect of reducing the impact to 152% of the non-big box scenario. The other proposed parameter (LOS level of service)

73-24

73-25

offered by the DEIR shows that the score drops from 'A' to 'F' as a result of the big box stores and the mitigation efforts do not improve this score at all. Amazingly, the DEIR considers this to not be a significant impact.

↑
73-25

The DEIR appears to determine impacts of their project as minimal because it assumes that all other pending development projects will be approved. It may be seen that the DEIR's for other pending projects, such as the 'Lowe's' center take the same gambit, arguing that they have relatively minor impact because they assume that the 'Lane Ranch' project will be approved. As a result the three big box development projects have provided a shell game in which each DEIR hides the true effect of their development among the effects of the other projects.

73-26

An active community response organization has been formed with the primary objective of stopping all of the proposed large development projects. By assuming the traffic growth of the Lowe's and Wal-Mart stores as a fait accompli, the DEIR shows contempt for the rights of the community to influence future development.

73-27

Proposed Resolution

The traffic analysis should be re-computed to show the relative impact to traffic congestion parameters relative the 'existing ' or 'existing + ambient growth' conditions. This change should be used to characterize the significance of the impacts.

In many of the intersections, it will be necessary to re-characterize the impacts as highly significant even after mitigation.

73-28

Cover page from Urban Decay analysis, note date of the study:

HR&A ADVISORS, INC.
Economic Development, Real Estate Advisory & Public Policy Consultants

*Revised Working Draft
Not for Public Distribution*

**ECONOMIC, FISCAL AND "URBAN DECAY" ANALYSIS OF THE
PROPOSED LANE RANCH TOWNE CENTER PROJECT,
IN THE CITY OF LANCASTER, CALIFORNIA**

73-29

Prepared for:

Planning Department
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

Prepared in association with
Whitney & Whitney, Inc.

October 2007

Swain, Jocelyn

From: cindi dickerson [cindidickerson@hotmail.com]
Sent: Monday, February 23, 2009 12:34 PM
To: Swain, Jocelyn



Good morning Ms. Swain,

I am writing to you, as I hope many others are, regarding the building of the Wal-Mart shopping center planned for the corner of Avenue L and 60th Street West in Quartz Hill.

My husband and I purchased a new home just a mile from that corner in July of 2008 – a very quiet neighborhood – something we searched for well over a year. We were careful in our purchase, looking to get a good home and the peace and quiet we lacked in our former neighborhood – which was flanked by Wal-Marts to the east and the west.

74-1

We were not informed by the builder of the proposed Wal-Mart; whether they did not know or they chose not to tell us, we are not sure. Rest assured however, we are not happy.

The obvious concerns such as traffic, building next to a high school and just the general nature of what is usually associated with Wal-Mart stores I will not go into. These are just given concerns; I am sure you have heard much about them.

74-2

My bigger question is: Seriously? Do we really need ANOTHER Wal-Mart in this valley? If we are going to promote business growth in the Antelope Valley, why are we not marketing to some formidable competitors? Why are we filling this valley with businesses that attract the lowest common denominators? Why are we not bringing in some businesses that will not just generate revenue and jobs, but that will be an encouragement to other businesses to open here as well? Is Wal-Mart the best we can do, and again, how many do we really need?

74-3

I raised my children in this valley, it was a peaceful place with a small town feel 20 years ago, but I do not encourage them to stay here. It may be an affordable place to live, but there is no attraction to it anymore. The only media coverage we receive is about the increasing violence – which will not get any better by bringing in another discount store. Our aerospace industry is a bit of a plus, but everyone I know retiring from these companies is leaving the state, they don't want to be in this valley any longer.

I know we all think “we can do it better”, and I certainly would not want to be in your shoes or those of anyone in the public eye hoping to keep everyone happy. But it doesn't take a rocket scientist to know that another Wal-Mart is not going to help our valley and our economy - it is going to hurt it by increasing crime, pollution, and minimum wage earners who are going to be seeking government assistance and section 8 housing. Don't get me wrong, thank God for the diversity, but if we want to attract revenue to this valley, we need something more attractive than Wal-Mart. Money follows money.

74-4

Please, please, think about our valley, our home. Please encourage those around you to do the same. Let's work to make this valley an attractive place again to live, not the Antelope Valley that everyone pokes fun at and the place people are afraid to come.

Thank you for your time,

Gary and Cindi Dickerson

Swain, Jocelyn

From: John Dougherty [je.dougherty@yahoo.com]
Sent: Saturday, February 21, 2009 3:23 PM
To: Swain, Jocelyn
Subject: Super Center - NOT NEAR OUR SCHOOL!

Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Email: jswain@cityoflanasterca.org



I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

75-1

Please move it out to 70th and L. JUST NOT NEAR OUR SCHOOL!

John Dougherty
42845 Elena St.
Lancaster CA 93536

Swain, Jocelyn

From: tammany FIELDS [tammanykfields@hotmail.com]
Sent: Monday, February 23, 2009 3:03 PM
To: Swain, Jocelyn

Re: Eir here is a perfect example and one that wasn't addressd in the EIR. ABC did a storry and this is what they found and this is what will happen here.
: "ABC News medical unit reported on Thursday a stunning new risk to your health: fast food. Just living next to a fast food restaurant ups your stroke risk." . "People living in neighborhoods where fast food restaurants are plentiful appear to have a higher risk of stroke than those living where such restaurants are scarce, a new study says. Fast food consumption has previously been linked to higher rates of heart disease and organ damage. In this latest study tying fast food restaurants to cardiovascular ills, researchers studying neighborhoods in one Texas county found that people living in regions with 33 fast food restaurants or more had 13 percent greater odds of stroke." This needs to be studied especially since it would be placed next to a high school.

76-1

Thanks Jocelyn

Tammany Fields

Windows Live™ Hotmail@:...more than just e-mail. [Check it out.](#)



Swain, Jocelyn

From: onefabfam5@roadrunner.com
Sent: Monday, February 23, 2009 11:13 AM
To: Swain, Jocelyn
Subject: Oppose Walmart



City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Ave L(NW and SE corners) and 60th Street W and Ave K (NW corner).

I have read the Draft EIR(s)either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns for my community below. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

77-1

I live directly across the street from both of the shopping centers to be at 60th W and Ave L. We moved to this area to be away from the busy congested crime areas of Lancaster. Here are my concerns as well as many other residents:

1. INCREASE TRAFFIC in and around my neighborhood. There is a proposal to put a traffic light at the entrance of our housing track which will cross to the entrance of the shopping center. This will invite people to drive into our neighborhood trying to get out of the shopping center. The entrance to our nieghboorhood is also the exit.So people will be driving around trying to find a way out.We already have people driving fast through our residential neighborhood so this increases chances of accidents and our children playing to get hit by a car or kidnapped. Who is going to be responsible when any of these things happen?? What is going to be done to stop increase traffic?

77-2

2. INCREASE CRIME in our area. Walmart is open 24 hors. What majority of people are up past midnight? CRIMINALS or people up to no good. This will increase vandalism, theft, rape, etc. Need I say more. Who is going to be responsible? Who is going to make sure we have enough law enforcement to handle these crimes? Better yet, Who is going to prevent them from happening in the first place.

77-3

3.SAFETY OF OUR CHILDREN. We have a High School directly across the street. We have many kids that walk to and from school. We have many new drivers at the High School. This increases chances of kids being injured or even killed by an automobile. These kids are just learning how to drive and this increase their chances of having an accident. This also gives kidnappers and rapists more temptation and opportunities. Who is going to be responsible and what is going to be done to prevent this from happening?

77-4

4. INCREASE TRASH. With more people comes more trash. People walking from the shopping center especially the teenagers that come from the High School across the street will drop their empty food containers or whatever else they don't want to carry after they buy from the stores or fast food places onto the streets. I don't want to clean up after other people. So how are you going to make sure our streets and neighborhood stay clean all the time like it is now?

77-5

5. INCREASE PROPERTY TAXES. Are they going to increase? If so why should I pay for something I don't even want here? I can barely pay for my property taxes now. Times are hard.

77-6

6.INCREASE NOISE. We live right off the streets at the corner of both shopping centers so we will have to listen to cars, loud music and loud people all night long. We don't have that

77-7

now because there is nothing to do over here that late except watch High School Football Games, which we enjoy. We won't be able to keep our windows open on those clear warm nights. What is going to be done to reduce noise?

77-7

Thank you for hearing my concerns and I will be waiting for your answers. Even though the best answer is NOT to approve this project. We have plenty of Walmarts and stores in Lancaster, which many are going out of business as it is. That brings up another issue of the many small businesses in Quartz Hill that will be affected and may go out of business.

77-8

Channa Gardner
42846 59th St. W
Lancaster, CA. 93536

Swain, Jocelyn

From: Gesiriech, Heidi CTR USAF AFMC 95 ABW/EM [heidi.gesiriech.ctr@edwards.af.mil]
Sent: Monday, February 23, 2009 12:53 PM
To: Swain, Jocelyn
Subject: Commercial rezoning near 60th Street West and Avenue L

City of Lancaster,

I am writing this notice of refute to oppose the commercial rezoning for three projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft EIRs and disagree with some of the data collected. In response to the reports, I have listed the concerns I have for my community below. Further, I request that my concerns be addressed prior to a decision being made to approve this rezoning.

78-1

I am VERY concerned about the developments near Quartz Hill High School at 60th Street West and Avenue L. My daughter attends school there, and parents do not want large commercial developments directly across from the school creating more traffic hazards and an increase in crime. PLEASE leave Quartz Hill rural. We have plenty of Walmarts and other shopping in the Antelope Valley, but we are losing our rural areas. We have four Walmarts already, and one just a few blocks from this proposed site. I live in Elizabeth Lake and don't mind driving to the existing shopping centers in Lancaster, I do it all of the time. PLEASE keep the streets and land around Quartz Hill High School rural. The residents oppose this rezoning and the parents whose children attend the school oppose this rezoning. PLEASE do not allow these commercial developments to be built in this area.

78-2

Thank you for your attention. I would like these concerns addressed prior to any decisions being made.

Heidi Gesiriech
661-810-3442
14355 Joshua Tree Drive
Elizabeth Lake, CA 93532

Heidi Gesiriech
JT3/CH2M HILL
Community Relations Supervisor
Edwards AFB Environmental Management
661-277-7049 - office
heidi.gesiriech.ctr@us.af.mil



Swain, Jocelyn

From: Richard Hecker [gr8birds@qnet.com]
Sent: Monday, February 23, 2009 11:06 PM
To: Swain, Jocelyn
Subject: Additional comments
Attachments: 2nd_list.doc

Hi Jocelyn;

It has been too hectic of a day. I had been working on some additional comments that I wanted to include. I was hoping there would be more time today to write up my thoughts. With today coming to a close, I am attaching another list. It is not very big but it does list a few more pages that ought to be considered.

79-1

Richard Hecker



Additional pages that raise concerns

Page 1-51 through page 1-58 The mitigation measures repeatedly state a “fair share contribution” will be made. This does not solve the problems. Until the infrastructure is in place to handle the traffic, the community will suffer. The projects will generate additional traffic. The General Plan calls for infill development to avoid these types of problems. One option would have the projects install all these improvements and future projects would reimburse the cost down to the “fair share” level that these projects want to pay.

79-2

Page IV A-2 Quartz Hill has a history of flooding events. This section does not account for a failure in the aqueduct that is just up the road.

79-3

Page IV B-10 through IV B-13 The analysis is flawed. The 5 mile radius PMA does not adequately account for other significant stores. For example, the Walmart on Valley Central Way is barely outside the PMA discussed here. If a person maps the PMA from that store and the PMA from this project, it is obvious that a significant overlap exists. The situation is worse if you look at the SMA overlap. The authors do not provide the data that supports their conclusions.

79-4



Roy Henstrand
P.O. Box 3312
Quartz Hill, CA 93586



February 18, 2009

City of Lancaster
Attn: Jocelyn Swain, Associate Planner
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain,

The purpose of this letter is to state my disagreement with the Environmental Impact Report for The Commons at Quartz Hill. With over 20 years experience in law enforcement, a Math degree from USC, and course work in Urban Societal Planning at USC, I find the statements pertaining to crime to be superficial, inaccurate and not fully researched.

Using data obtained from the Los Angeles County Sheriff Department under Government Code section 6254(f)(2), and the California Constitution, Article 1, section 1, there were 322 people detained for theft at the East Lancaster Walmart (1731 E. Ave J) in 2008. Of the 322 people, 38% were juveniles. During the same time period, there were 234 people detained for theft at the Valley Central Way Walmart with 42% being juveniles. Compared to the Lancaster Target (55 detained with 35% juveniles). Walmart has between a 425%, and a 585%, higher reported crime rate than a comparable retail store (in this case Lancaster Target).

More notably, although the population of Lancaster has approximately 11% of it's population between the ages of 12-17, this group would account for between 38%-42% of the crime at a Walmart. This would indicate that juveniles are almost four times more likely to steal at a Walmart than an average person. Placing a Walmart next to such a high risk group (I.e. Quartz Hill High School students) would lead to a VERY SIGNIFICANT IMPACT to them. There is also the additional impact on those students who decide to cross Avenue L and steal. Once caught, the student would be required to attend Juvenile Court and would thus miss additional school. Since a majority of the students at Quartz Hill High School do not drive, even placing the Walmart further north (maybe across from the prison.....it might be a good theft deterrent) would reduce the accessibility of the temptation for the students to steal. As planned now, all a student would have to do is cross one street during lunch for

80-1

80-2

the opportunity to steal from Walmart and impact his/her education. Juveniles are a high risk group and do not need a Walmart near their school.

Since the East Lancaster Walmart is closer to the type of setting that the Quartz Hill Walmart will be (i.e. close to houses compared to Valley Central Way which is further from houses) it should be used when predicting future crime. With Walmart accounting for 322 incidents of theft in 2008, the claim that the proposed project would have "no long term operational impacts to public protection services (page I-49)" would seem to be false. Any arrest for theft would require a Sheriff Radio Car to be out of service for approximately two hours. Field releases for adults are not allowed (due to requirements for possible future 666 PC arrests having to be fulfilled). For juveniles, a parent must sign the citation (unless the theft is under \$50 and the juvenile is eligible for traffic court). By the time the parent responds to the Sheriff Station to claim their child, and sign the citation, a juvenile arrest can take a deputy out of service for 3-4 hours from start to finish. If a majority of the juvenile theft arrests happen at the end of school (although it is more likely they will take place during school hours also), there would be a significant delay in response time due to shift change at the Sheriff Department being near the time school lets out. To send a Day Shift car would require the deputy to receive overtime to finish the call. To send a PM car would require a wait for the car to go in-service and to drive to the store. Reviewing past Walmart arrests, several times the request for a deputy was cancelled due to long response times. Since the Sheriff Department fields less cars on the West Side than on the East Side, the loss of a single car for any extended time period would have a significant effect on response times for not only West Lancaster, but for Quartz Hill since a Lancaster City Car frequently is the closest car to emergency calls in Quartz Hill.

Any disruption to Quartz Hill High School would be a SIGNIFICANT IMPACT. When a fleeing theft suspect fights with Walmart Security, or with an employee, it becomes a felony robbery (211 PC). If that fleeing felony suspect now runs to Quartz Hill High School (a good place to blend into the crowd) the school would have to lockdown effecting all students on campus. Only after the Sheriff Department cleared the campus, would the school be able to resume normal operations. Both Lancaster Walmarts have had incidents of shoplifting which have turned into robberies. They have also had cases of purses being stolen, cars being stolen, assaults, and other serious crimes which do not belong near a school. The legal liability if a student is hurt during a Walmart crime is something lawyers dream about.

In summary, the Environmental Impact Report, as presented, fails to adequately examine the impact such a high crime store (as proven by public statistics) would have on the students at Quartz Hill High School. It also fails to examine the number of Patrol Minutes the store would require from the Sheriff Department. A thorough report would examine the current average response time for the area, and then estimate the new response time based upon the projected service hours required as derived from statistics obtained from the current Lancaster Walmarts. There is no indication that any statistical analysis was

80-2

80-3

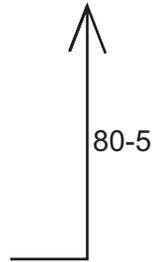
80-4

80-5

done by the EIR preparers using the specific crime statistics for Lancaster Walmarts, or for the "call for service" response time statistics (except for emergency calls which was briefly covered). If you are the person who has to wait 3 hours for a deputy to take your crime report because a West Side Car is busy booking a Walmart shoplifter, then you might feel it is a SIGNIFICANT impact. For these reasons, I respectfully request that the EIR, as published, be rejected and the area of crime be fully examined using 2008 statistics.

Sincerely,

Roy Henstrand



80-5

Swain, Jocelyn

From: THERESA LEA [treelee6@msn.com]
Sent: Friday, February 20, 2009 9:13 PM
To: Swain, Jocelyn
Subject: Big Box Stores



B. R. Lea
4582 W. L-10
Quartz Hill, Ca.
93536
661 943 518
February 18, 2009

Jocelyn Swan,

My first concern about the commercial re-zoning of 60th St. W. & Ave L and also at 60th St. W. & Ave K to build Superstores is, where is the water going to come from? According to the 2005 Water Management Plan for the Antelope Valley, we have enough water supply to meet necessary demands through 2030. A lot has happened in the Antelope Valley in the past 4 years. It is my belief that the report is out of date and should be re-evaluated. Sundown Elementary School at 60th St. W. and J-8, is currently in the process of installing a pump to help their water pressure problem. And why are the residents in homes on the Westside having significant problems with water pressure? In the event of a wildfire or even a residential or school fire, will there be enough water for the Fire Dept. to fight it? The Antelope Valley is already in a drought and residents are being required to conserve. Do you really think the water situation will improve and how do you justify putting in these Big Box Stores and the large amounts of water they would need to operate? It is my opinion that as long as this water problem exists, there should be no commercial construction allowed.

81-1

My Second concern is the local politicians, news media and Superstores trying to convince the public that these businesses will be good for the community and create much needed jobs. If the truth be known, these jobs are not livable wage jobs and most of them will need to be supplemented in our state welfare system, by taxpayers, in some form whether it be with HUD Housing, Food-stamps, Medi-cal, WIC or an AFDC check. Stores like Wal-Mart not only create but perpetuate a Welfare State. Our children are our most precious commodity, we need to offer them more of a future than that. It seems that we are only interested in bringing these types of jobs to the Antelope Valley and not real jobs people can support families on and really live the American Dream. Our Mayor has recently said in the AV Press that he is concerned about improving the quality of our communities. This is not the way to do it! If anyone wants a decent job they must move out of the AV because we only have minimum wage jobs to offer.

81-2

Another concern is, it is a well known fact that these Big Box Superstores devastate communities and that most other smaller businesses can't compete with them and their tendencies to pressure sweat shops in third world countries to mass produce for near nothing, dollar wise. Quartz Hill is a rural community and we would like to keep it that way. Big Box stores bring traffic, pollution, crime and close other businesses. How many empty buildings will it take before our elected politicians get the message that enough is enough!

81-3

My next concern is about these stores being so close to the schools and selling alcohol and tobacco. Are you willing to sell out our children, our schools and our communities like this just so that a chosen few may make more money and further their own agendas?

Mr. B. R. Lea



February 20, 2009

Jocelyn Swain
Planning and Development
City of Lancaster
44933 N. Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain:

I would like to address several items in the Draft Environmental Impact Report for the projects planned at 60th West and Avenue L in Quartz Hill that are either, in my opinion, completely false or at the very least, misleading.

82-1

1. Air quality data is referenced from the Division Street monitoring station. The Division Street monitoring station would have to be at least 6 or 7 miles from the corner of 60th Street and Avenue L, depending where on Division Street the station is located. Additionally, the Draft Environmental Impact report contains an "Error! Reference source not found" message following this statement, so we do not know what the data actually is.

82-2

2. According to the Lancaster General Plan, there is a proposed park and school at K-8 to K-4 and 65th Street. How will extensive commercial development at the corner of L and 60th and K and 60th impact another school and neighborhood park?

82-3

3. According to the language of the Draft EIR: "Emissions from construction can be categorized into three sources: 1. Fugitive dust from earthmoving activities; 2. Construction equipment exhaust; and 3. Worker vehicle exhaust."

This does not address the issue of volatile organic compounds (VOCs) from asphalt paving, which would be substantial. Additionally, concrete dust is mildly carcinogenic.

82-4

It also does not address concerns about the amount of pollution that a shopping center with almost 2,000 parking spaces will generate.

4. Also according to Draft EIR language: "More specifically, the design, height, and massing of the buildings included within the proposed project would be consistent with the existing development in the area **and would present a desirable image for the area.**"

82-5

Please. A 41'6" Walmart facade does not in any way present a desirable image for the area. Nor is it consistent with the existing buildings, which consist of a one story school and two story homes. Can you name one other 240,000 square foot tilt up building in the area?

82-5

Also, Draft EIR, section 3.8.1: "Important scenic resources in the City of Lancaster include local views of surrounding buttes, Quartz Hill, and long distance panoramas of the San Gabriel Mountains..."

82-6

This conveniently neglects the Tehachapi Mountains completely. They present a lovely view from the front of the school.

5. From the Draft EIR: "Therefore, the oversupply of Food Store space and Drug Store/Pharmacy space projected in the analysis would not create competitive conditions that would lend to urban decay. Thus, impacts related to the proposed project's Food Store Space and Drug Store/Pharmacy space would be less than significant." Also: "Under these assumptions, the total proposed supply represents the equivalent of 145 percent of total demand in 2012."

82-7

These statements completely contradict each other. 145% of demand is in and of itself problematic, but projected out until 2012 assuming a rate of growth that no longer exists is completely idiotic. How would this not create competitive conditions? Ultimately, this would absolutely and directly lead to the Urban Decay issue referenced in the EIR.

6. From the Draft EIR: "The objectives of the proposed project are as follows: To create development on the currently underutilized project site to provide commercial retail facilities to serve the local community; and to generate significant sales tax revenues to benefit *the general fund*." (The italics are mine).

The local community has been quite outspoken as to not wanting it there. Walmart is currently collecting signatures on petitions circulated at their other stores to bring jobs to the Antelope Valley. These signatures have no validity as far as Quartz Hill locals wanting the centers.

82-8

Additionally, this will not generate sales tax for a good portion of the surrounding area. It will generate sales tax for the City of Lancaster.

7. From the Draft EIR: "...would provide full and parttime employment for approximately 927 persons."

82-9

It might. It probably also means that a lot of those employees would be transfers from other stores, which will lose employees. It doesn't say that it would be in addition to their existing

employees. There are only so many people shopping at Walmart. Walmart's bottom line is always about money; not about providing jobs. The Antelope Valley needs better jobs than what Walmart is interested in providing.

82-9

8. Section 19.1.1, Draft EIR: "Promote high quality projects and facilitate innovation in building design, land use mixes and site planning, and by encouraging mixed use developments that contain, when appropriate, pedestrian scale and uses that encourage a sense of place."

82-10

A shopping complex such as this will have zero pedestrian traffic and will actively discourage bicycles and pedestrians due to scale and traffic. It's 5 acres of just the building, let alone the parking lots or major retail store #2.

The proposed street changes include no bicycle facilities. There is no mention of bicycle/pedestrian traffic in the Draft EIR. And this is at a school.

82-11

It appears that no left turns will be allowed from Avenue L to the Avenue L QHHS parking lot per II-3. How will that work? It also looks like no u-turns, will be allowed, so will people from the east development driveway have to turn around in the Desert Winds Continuation School parking lot? Has anybody spoken to the Desert Winds administration about that?

82-12

Per AASHTO (American Association of State Highway and Transportation Officials) Guidelines, which should govern this area, a divided arterial should have 12' lanes. A lane of 10-11' width, which is what is being shown now, can be used *if it is highly restricted and there is no truck or bus traffic*. This will not apply at all. Additionally, an arterial with this many lanes should have shoulders, and there are none. Both the lane width and loss of shoulders are very inappropriate for a high-speed major arterial.

82-13

Additionally, it appears that all on-street parking on L and 60th has been removed, including the informal loading area on the east side of 60th Street West. There are approximately 100 spots. Where will these students park? Obviously, in the shopping centers, and that will also be a prime loading zone for parents as well.

82-14

Also, while a minor point, it appears as though there should be two ramps at each corner, not just one, as currently depicted.

82-15

9. Walmart not only allows, but encourages, RV'ers to spend the night in their parking lots, even to having employees bring out coffee to the occupants. This is within 1000 feet of an existing school and potentially the other school identified in Lancaster's General Plan. Once this school is built, mobile predators - sexual and otherwise - will be allowed to set up temporary housekeeping between 2 schools. What better place for a predator to loiter?

82-16

10. The traffic figures cited in the Draft EIR are nonsensical. Car counts were taken manually when school wasn't even in session and when students were in class. Peak time around a school is not at 5 p.m. weekdays. I'd like to see some counts from the 6:30 to 7:30 a.m. and 2:15 to 3:15 p.m. time periods. On weekdays, that is. 82-17

11. Lancaster officials felt that the noise generated by the so-called "musical road" on Avenue K near 60th Street West was sufficient to have the street repaved. A novelty road would not begin to duplicate the amount of street traffic residents in the area will now be subject to. 82-18

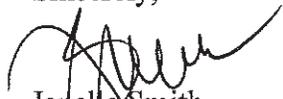
12. Draft EIR, section 18.2.1: "Encourage appropriate infill development." 82-19

This is not infill development. It is the opposite.

13. And how about selling alcohol, tobacco, and ammunition 1,000 feet from a school? 82-20

And these are just items that are addressed in the Draft EIR. This doesn't address student safety, which will certainly suffer, real estate values, the sense of community in the Quartz Hill area, water, light pollution, trash, vandalism, truancy, crime, flooding, and a host of other quality of life issues. 82-21

Sincerely,



Janelle Smith
4833 West Avenue K 8
Lancaster, CA 93536

Swain, Jocelyn

From: Alexis Upton-Knittle [auk9@earthlink.net]
Sent: Monday, February 23, 2009 4:51 PM
To: Swain, Jocelyn
Subject: comments/The Commons at Quartz Hill Draft Environmental Impact Report

As owners of several homes in Lancaster, I object to the findings in the Draft EIR report as being not comprehensive enough with regard to the impact of air pollution and traffic hazards on the surrounding residents as well as the students attending Quartz Hill High School.

83-1

In the DEIR, in Section IV, it is noted "The criteria pollutants for which federal and state standards have been promulgated and that are most relevant to air quality planning and regulation in the MDAB are ozone, carbon monoxide, fine suspended particulate matter, and nitrogen dioxide. In addition, toxic air contaminants and greenhouse gases are of concern in the MDAB." IV-D2. I request that a complete report be done that can completely convince the community that its residents and students will not be harmed by these pollutants if a Wal Mart and Target are built. There are many studies which already show that these pollutants do cause irreparable damage to human health and longevity.

83-2

The EPA on its own website at <http://www.epa.gov/air/urbanair/6poll.html> states: "**Health Effects Information:** Exposure to these pollutants is associated with numerous effects on human health, including increased respiratory symptoms, hospitalization for heart or lung diseases, and even premature death." bottom of page 1. I question then why the community of Quartz Hill should be forced to risk their health for the benefit of a Wal Mart store.

While there are many questionable conclusions drawn by the DEIR, I will refer to one other which has to do with flood waters. The preparer of the DEIR has incompletely addressed the issue of flood waters in the community of Quartz Hill and the area surrounding the site for the Wal Mart. The issue of flood damage is historic in this community and several new developments have exacerbated the situation. The building of this enormous project in this area that is lacking in proper infrastructure to deal with flooding water will only increase our problems and in fact bring greater surface water pollution as well as damage to surrounding properties. The preparers should be able to demonstrate how this site will be mitigated to handle the additional flood water created by the building of the Wal Mart.

83-3

Sincerely,

Alexis Upton-Knittle

Lloyd J. Cook



Swain, Jocelyn

From: Vatcher0905@aol.com
Sent: Saturday, February 21, 2009 3:34 PM
To: Swain, Jocelyn
Subject: EIR report for 60th St. west / Ave L

As residents of the neighborhood adjoining Quartz Hill High School, we are writing to oppose the location of three major retail stores planned for L and 60th. We are concerned that this development will destroy our quality of life due to air, noise, and light pollution.

84-1

No matter how well-designed big-box stores are, they require large asphalt parking lots that constitute an ugly, dirty eyesore. Further, their lights would be visible all night long. Noise from delivery trucks needed to serve the stores would be heard day and night, as well as that from customer and employee traffic. The EIR didn't even come close to addressing the real problem. Fumes from these vehicles, as well as those idling in fast food lines are bound to affect the air we have to breathe.

84-2

One more thing, we question whether yet another giant retail development is the best use of California's scarce water resource. If the state goes to water rationing, these stores should not be built!

84-3

Sincerely:

Robert and Nancy Vatcher

A Good Credit Score is 700 or Above. See yours in just 2 easy steps!





Swain, Jocelyn

From: Amy Vincent [amy.vincent@hotmail.com]
 Sent: Saturday, February 21, 2009 10:18 PM
 To: Swain, Jocelyn
 Subject: QH Supercenter

I am a resident in the Quartz Hill area- I live on 65th St. West and L very close to where the proposed Walmart and Target supercenters are supposed to go. Traffic in the morning and in the afternoon is already bad with parents and students trying to get in and out of Quartz Hill High School. What should take two minutes to get through the L and 60th intersection takes upwards of 10 minutes and that is without the supercenters in those areas.

85-1

The Antelope Valley does not need another Walmart we already have 4 too many Walmarts and bringing the Walmart to one of the nicest parts of the Antelope Valley will bring unwated crime, traffic, and will drive home prices even further into the ground. Walmart will close down small businesses because no one can compete with their low prices. Residents are going to the small businesses in QH because they don't want to drive all the way into town but if Walmart or Target was there they would go to those stores because they have lower prices than what the small businesses can afford to offer. Walmart is not an ethical or socially responsible company. **Wal-Mart's Health Care Plan Fails to Cover Over 775,000 Employees.** Why does the Antelope Valley want to continue to support a company that does not offer it's employees a way out of poverty?

- Since the average full-time Wal-Mart employee earned \$17,114 in 2005, he or she would have to spend between 7 and 25 percent of his or her income just to cover the premiums and medical deductibles, if electing for single coverage. [Wal-Mart 2006 Associate Guide and UFCW analysis]
- The average full-time employee electing for family coverage would have to spend between 22 and 40 percent of his or her income just to cover the premiums and medical deductibles. These costs do not include other health-related expenses such as medical co-pays, prescription coverage, emergency room deductibles, and ambulance deductibles. [Wal-Mart 2006 Associate Guide and UFCW Analysis]
- The estimated total amount of federal assistance for which Wal-Mart employees were eligible in 2004 was \$2.5 billion. [The Hidden Price We All Pay For Wal-Mart, A Report By The Democratic Staff Of The Committee On Education And The Workforce, 2/16/04]
- One 200-employee Wal-Mart store may cost federal taxpayers \$420,750 per year. This cost comes from the following, on average:
 - \$36,000 a year for free and reduced lunches for just 50 qualifying Wal-Mart families.
 - \$42,000 a year for low-income housing assistance.
 - \$125,000 a year for federal tax credits and deductions for low-income families.
 - \$100,000 a year for the additional expenses for programs for students.
 - \$108,000 a year for the additional federal health care costs of moving into state children's health insurance programs (S-CHIP)
 - \$9,750 a year for the additional costs for low income energy assistance.[The Hidden Price We All Pay For Wal-Mart, A Report By The Democratic Staff Of The Committee On Education And The Workforce, 2/16/04]

85-2

There are so many vacant stores in the AV why do they need to build new buildings- focus on bringing in

85-3

new businesses to fill the empty buildings.

85-3

The Cost of Wal-Mart's entry into a community can be significant

- According to a 2003 estimate, the influx of big-box stores into San Diego would result in an annual decline in wages and benefits which could cost the area up to \$221 million [San Diego Taxpayers Association (SDCTA), 2003]

85-4

Lower wages mean less money for communities

- When an employer pays low wages to its employees, the employees have less money to spend on goods and services in the community, which in turn reduces the income and spending of others in the community. In other words a reduction in wages has a multiplier impact in the surrounding area.
- For instance, in 1999, Southern California municipalities estimated that for every dollar decrease in wages in the southern California economy, \$2.08 in spending was lost-- the \$1 decrease plus another \$1.08 in indirect multiplier impacts. ["The Impact of Big Box Grocers in Southern California" Dr. Marlon Boarnet and Dr. Randall Crane, 1999.]

85-5

Would you want a Walmart as your neighbor? Drive by any Walmart in the AV during different parts of the day and I guarantee you will see trash all over the parking lot, carts all over and spilling into nearby neighborhoods, teenagers loitering outside day and night, etc. Walmart is not a good addition to the west side of town. If you must put a Walmart on the west side of town put it near the prison- I'm sure that's what Walmart employees refer to it as.

85-6

Windows Live™ Hotmail@:...more than just e-mail. [Check it out.](#)

Swain, Jocelyn

From: PWill72710@aol.com
Sent: Friday, February 20, 2009 9:30 PM
To: Swain, Jocelyn
Cc: William.Warford@avpress.com; RRexParris@cityoflancasterca.org
Subject: [POSSIBLE SPAM] Addendum to commentary re EIR Walmart/Target @H
Importance: Low



Dear Ms. Swain,

Thanks again for copies of the Draft Environmental Impact Report you provided on Wednesday, 2/18/09. The following are additional comments that I could not address in the 3 minutes provided at the Lancaster Planning Commission meeting on that date.

The affects of building large commercial centers on the values of homes in the Quartz Hill/Lancaster neighborhood is not addressed at all in the Draft EIR, but it is a concern many specifically requested to be included. I find it reprehensible that you would believe notification to homeowners residing in a 500 yard radius are the only ones that warrant notice and information as to how to respond to this proposed new Walmart sighting. 500 yards to the south is the high school. To the west if an empty field, to the north is maybe two blocks of new homes and to the east no more than three streets of newly occupied homes. In all probability it's likely that you notified less than one hundred homeowners. This is a much bigger deal than that.

86-1

As I stated Wednesday, many home owners purchased their homes, as did I, in this rural/residential neighborhood to escape the urban city environment. We were led to believe that no commercial development would encroach upon the immediate area, and we confidently purchased homes in excess on \$400,000 in what we believed would develop into an upscale area. Those of us who continue to maintain these properties will have paid close to \$1 million dollars or more over the life of these loans. And despite the fact that we have watched our property values sink to half the purchase value, we are not willing to have the Planning Commission add insult to injury by throwing up another unwanted and unneeded Walmart, Target, Home Depot, or Lowes in our backyard. To do this will lessen the likelihood of ever recovering our property value in the years to come.

86-2

The rational that these developments will provide us an immediate benefit in terms of revenue and convenience is fallacious at best. We do not want to be confined to our neighborhood. Going into town gives us a much needed outlet and allows us the opportunity to spend our dollars in independent establishments we might not otherwise be aware of just because we are driving around. On the other hand, it allows small business owners an additional and continuous client base that will keep them from going out of business. And more importantly it eliminates the vacancy rate that is growing at an ever alarming rate and adds to the blight of many existing neighborhoods.

86-3

The EIR states that crime would be no more than can be expected in a commercial area. The commission hired an out of the area firm to assess the impact of crime on an area it knows nothing about. I can see it now: "Girl (high, middle, or elementary school) nearly abducted. Suspect escapes in crowded shopping center. Surrounding area searched to no avail." Or, "Officials ask public's help in finding alleged teen stalkers." Oh wait! I did see that one in Thursday's, 2/19/09, Antelope Valley Press, Lights and Sirens section on page 2. True, it wasn't in our part of the valley, but it will be coming soon as that area is rezoned.

86-4

I saw what Walmart did for the Eastside in just two short years out of the 15 that I lived there. And I lived on the Ave K and 20th end. I couldn't wait to get out of there. I would bet anything, short of my life that this part of town will become the Beverly Hills of Section 8 residents as many people just walk away from their properties, or sell at a lost because they didn't get the benefit of their bargain.

86-5

With not one, but a super center discount store on every major corner (Avenues L and K), what will happen to the value of our homes? Who would want to buy a home that faces the delivery area or parking lot of a major shopping center? Who would want to buy a home that will be covered in plastic bags, fast food trash, and abandoned shopping carts clogging the neighborhood streets? Who would want to buy a home that is down wind of the fast-food and restaurant smells? Who would want day workers milling about? Very few, if any, would want to buy a home next to a major shopping center. The people who would like to be within walking distance of any of these discount super centers are not the people who can afford the values these homes used to have and hopefully will one day return to.

86-6

Why has the draft EIR failed to include the change in property values in its investigation? The impacts the commercial centers will have is not limited to only the adjoining properties, and this hew and cry is not coming from just the residents of Quartz Hill. The Draft Environmental Impact Report needs to investigate all the affects rezoning to commercial will have for all the current home owners in the area and the change in their property values.

86-7

I worked hard, saved my money, did my homework (I thought) before I committed to buying a nearly half million dollar home in an area I could look forward to coming home to at days end. I believed the developers and the city when I was told this area was zoned for residential only. I expected that one day the Lane Ranch parcel would go commercial, but not to this extent. I truly expected to see snow covered mountains in winter, distant poppy fields in spring, desert wildlife in the summer, and watch the valley go to sleep in the fall. I truly expected to be able to continue taking walks in the evening, waving to cyclists I didn't even know, and stopping to tell someone how nice their yard looked. Silly me!

86-8

Patricia O. Williams
6060 Ryans Place
Lancaster, CA 93536
(661) 943-6636

Need a job? [Find an employment agency near you.](#)

YAVITZ COMPANIES

February 23, 2009



Ms. Jocelyn Swain
City of Lancaster
44933 Fern Ave.
Lancaster, CA 93534-2461

RE: Lane Ranch Towne Center Draft EIR dated January 2009

Dear Jocelyn:

Thank you for the opportunity to review the Draft EIR for Lane Ranch Towne Center dated January 2009. On behalf of the applicant, I am submitting the following comments:

- 1. I. Introduction – Page I-S- Land Use references incompatibility with the existing residential zone. The existing property subject to the EIR does not contain a residential designation.
- 2. Page I-54 – Transportation and Traffic Mitigation Measure N-23 – The applicant’s contribution should be designated as a fair share contribution.
- 3. Page I-55 – Water – Please incorporate information from attached letter.

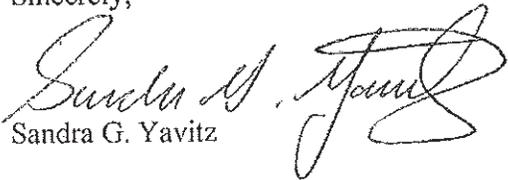
87-1

87-2

87-3

Thank you for your consideration.

Sincerely,


Sandra G. Yavitz

SGY/afc

9372

*Sandy, Jim
FYI
Jim*

LANE RANCH & CO.

42220 10th Street West, Suite 101 • Lancaster, California 93534-7075
(661) 942-0435 • Fax 942-7485
www.laneranch.net

January 5, 2009

Brian Ludicke, Director of Community Development
City of Lancaster
44933 N Fern Avenue
Lancaster, CA 93534

Dear Brian,

As part of the Environmental Impact Report currently being reviewed, the Lane Ranch property at 60th Street West and Avenue L uses water from three sources:

1. Quartz Hill Water District: a 2" water meter for domestic purposes and a large turnout with two meters, one an 8 inch and the other a 6 inch, that were designed to service the future commercial needs of the property, all of which are serviced from L. A. County Water District's main line.
2. Antelope Valley-East Kern Water Agency: a turnout which is designed for approximately 1000 gpm.
3. Our own well which produces approximately 250 gpm.

87-4

We irrigate approximately 25 acres of crops. The soil type for this area ranges from sandy loam to clay.

87-5

We use approximately 200 acre feet of water per year for the entire ranch of which approximately 130 acre feet is used for the proposed 35 acres that is the subject of this EIR.

87-6

The crops use about seven (7) acre feet per year per acre. The remainder of the water is used for livestock, landscaping and domestic use.

87-7

If you have further questions, please do not hesitate to contact me at the listed numbers.

Sincerely,

George M. Lane
George M. Lane

February 23, 2009

Richard Hecker
42906 47th Street West
Lancaster, California 93536

MS. JOCELYN SWAIN
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534



SUBJECT: DEIRs on The Commons at Quartz Hill & Lane Ranch Towne Center Project

Dear Ms. Swain;

I am concerned about the two draft Environmental Impact Reports (DEIR) that were made available to me last month. I am grateful that I was given the opportunity to speak at the February 18th meeting where I was able to briefly identify some of my concern. I promised at that meeting that I would follow up with a letter covering more material than the 3 minute limitation allowed me to cover. This letter provides that additional information.

Let me start out by repeating what I said at the public meeting. I believe that both DEIRs are flawed and need significant corrections. I will be unable to cover every flaw in this document. As I stated at the public meeting, there is not enough time to read, absorb, and analyze the content of both DEIRs. I will cover as much of it as I can in this document and I may even be able to send a second response before the February 23 deadline expires. I hope that you will treat all my responses in a cumulative fashion. While I may repeat information provided earlier, my intention is to identify the content of the DEIRs that need reconsideration.

At this point, it is probably a good idea to introduce my background. My education has been very technical and rigorous. My Bachelor of Science degree in Electrical Engineering was awarded by California State University, Fresno. During my career, I have worked with other Engineers and developed a deep appreciation for the common principles that unite us. Although I am not a Traffic Engineer or directly experienced in a number of the other specific areas of study that should form the foundation for these DEIRs, I still recognize the core principles involved. At the initial scoping meetings held at Quartz Hill High School (QHHS), I spoke up and notified the city that such professional expertise exists within our community and we are capable of doing our own analysis of the raw data. We are inclined to draw our own conclusions when the data is provided. We are capable of recognizing when mistakes are made. We appreciate the value of Peer Review and think it is in the city's best interest to accommodate our needs. With a transparent process where all the information is freely available, the mistakes can be identified and corrected so that our community truly benefits. These projects should not be approved if they harm our community.

88-1

At the public comment meeting, I mentioned that the assumptions that seem to be the foundation for these DEIRs was not documented. The fact that assumptions exist does not automatically disqualify these reports. I can attest to the difficulty in writing a technical document without it reflecting certain assumptions. But it is absolutely critical to list assumptions in a spirit of full disclosure to enable a reader to assign their influence the proper weight. As another general category, A number of the specific sections that concerned me seem to reflect sloppy work. I do not claim any special expertise, but I would expect them to handle attribution properly. When information from other documents applies, these authors should provide proper references so that the public can track down the information and establish the veracity of the claims. While the authors may spend 8 hours a day and 5 days a week pouring over this material, to the public these references are like needles in a haystack. The authors fail to provide the full bibliographical information that would enable citizens to participate in the process on equal footing. I would hope that the city officials would hold these authors accountable for the times when they draw conclusions without citing their supporting data. The data always speaks for itself.

88-2

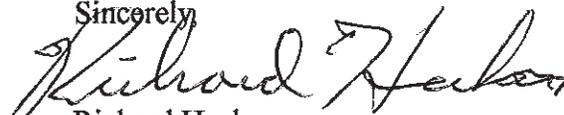
I will now elaborate on a specific concern I brought up at the public meeting. There were two sentences I read from table I-1 of The Commons at Quartz Hill. The sentences can be found on page 1-45 under the Response Distance paragraph. That paragraph explains that the 1.8 mile distance “does not meet the LACFD's requirement” and refers to a plan for a future fire station location. Although the report proposes a sprinkler system as a mitigating proposal, the report does not cite any authoritative source that would explain if a 5,000 gallon per minute flow at 20 pounds will suffice. Are we expected to accept such a claim on blind faith? The local water supply issues are an important topic. I was present at a city council meeting where a homeowner on the west side talked about water supply problems affecting his neighborhood. They had problems when an upstairs faucet was used. With the drought conditions we are facing, we are being asked to cut back even further. I question whether it is wise to rely on such a weak link for a critical public safety issue. I would remind you that Captain Murphy worked at Edwards. His observations are famous now with some people even calling them a law. I would hate to see the sprinkler system fail and the ensuing loss of life that easily could have been avoided if these projects were delayed until the supporting infrastructure around them was sufficient.

88-3

The two DEIRs are very similar in many respects. I found many of my concerns in both documents. I will only list the page numbers from The Commons at Quartz Hill. Since it appears that sections were cut and pasted between the two reports, the mistakes made in one document are frequently contained in the other. I am not claiming that all the concerns I list are present in both, but I think it would be prudent for the authors to look for the mistakes in both reports.

88-4

I am attaching to this letter a list of specific page numbers that exemplify my concerns.

Sincerely,

Richard Hecker

Most of these comments come from table 1-1.

Page 1-8 It refers to the General Plan but does not provide bibliographical information. Is this the new General Plan or the previous one? What was the published date?	88-5
Page 1-8 The mitigation measures may not suffice. My personal experience with the upgraded lights at Wienerschnitzel at L and 45 th leave me concerned about the claims. No data about the lumens or distance measurements are provide.	88-6
Page 1-14 It states "the proposed project is actually expected to decrease total vehicle miles" without attribution. Who has this expectation? What are their qualifications to make this assessment? Is there any data behind this conclusion? Is this expectation an example of one of the undocumented assumptions?	88-7
Page 1-16 There are no existing restaurants in the area and residents do not spend 16-20 hours a day preparing meals. The conclusion is without merit. It seems ludicrous to suggest the fast food restaurants will produce no more odors than the existing neighborhoods. Why not measure the existing neighborhood odors and compare?	88-8
Page 1-19 The report talks about the current chain link fencing that exists. The fence is a recent development probably installed in anticipation of these reports and the other activities. Do the statutes regulating these reports anticipate that some developers may stack the deck in advance?	88-9
Page 1-20 A foundation was removed from the site. Qualifications are not listed. Who determined that the foundation had no historical significance? What qualifications apply to the person or company that removed the foundation?	88-10
Page 1-22 Will I be given a copy of the report documenting the comprehensive geotechnical investigation?	88-11
Page 1-25 Has the evaluation of Ninyo & Moore been published? Proper attribution again is lacking. Where is the data?	88-12
Page 1-30 I would like a copy of the NOI when it is ready.	88-13
Page 1-32 Street sweeping is listed as a mitigation measure. How long will the sweeping continue? Will contractual obligations exist? It bothers me when a mitigation measure is subsequently discontinued as a budgetary decision.	88-14
Page 1-37 A conclusion is made that "developing residential neighborhoods surrounding the project site would benefit" without citing any supporting data. What standards are used to measure this benefit? Is this another undocumented assumption?	88-15

Page 1-39 Measurements for segments of 60th West north of Avenue J are nice, but I would like to see measurements for the 60th West and Avenue L intersection. Raw data from these measurements should suffice.

88-16

Page 1-41 Another ludicrous statement. "It is possible that construction of the proposed project could result in the need for the extension of roads or other infrastructure." The choice of words here is revealing. Are more undocumented assumptions present here? This statement is my personal favorite to suggest that bias may be involved.

88-17

Page 1-42 Some statistical information is provided but it sounds superficial. More data about the job balance would be worthwhile. No data about the quality of the jobs is provided. The lack of data may leave people comparing apples and oranges.

88-18

Page 1-45 Does not meet the LACFD's requirements. Mitigation measures are questionable. The General Plan calls for infill development to avoid these types of infrastructure problems.

88-19

Page 1-49 Still looking for undocumented assumptions. How they conclude that "no new or expanded police stations would be needed" escapes me. The Walmart at 10th East and Avenue J is a good example in this regard. That location required dedicated officers. Will this project likewise have the retailers pay for this type of support?

88-20



23

February 19, 2009

Ms. Jocelyn Swain
 Environmental Planner
 CITY OF LANCASTER
 44933 Fern Avenue
 Lancaster, CA 93534



Dear Ms Swain:

I have reviewed the “ECONOMIC, FISCAL AND “URBAN DECAY” ANALYSIS for both proposed shopping centers at 60th Street West and Avenue L. The report is Appendix L in the Wal-Mart EIR and Appendix M in the Lane Ranch EIR.

Prior to addressing the HR&A Advisors Report, which is the same document in both EIR’s, I am making the assumption that both Appendix L and Appendix M are the Final Reports even though the front page on each document states “**Preliminary Working Draft – Not for Public Distribution**”.

I want to address what I consider to be several “Major” mathematical errors or unjustified assumptions within the HR&A Advisors Report.

The first “Major” mathematical error/assumption is at the root of the report and thus causes an inaccurate mathematical projection through out the entire report.

I believe there is a “Major Error” in the stated value for the “Per Capita Personal Income”. The report on Page 34, Table 18 states Personal Income for every person (every man women and child) in each of the stated years below is as follows:

2007	2008	2009	2010	2011
\$41,802	\$43,559	\$45,390	\$47,298	\$51,357

The stated level of per Capita Income in the HR&A Economic Report surprised me and to be honest, I had hoped the report was correct with these stated income figures.

The HR&A Report states that it used demographic projections from the respected national firm, Claritas and also states the Primary Trade Area is 5 miles.

89-1

89-2

Ms. Jocelyn Swain
February 23, 2009
Page Two

Last night I purchased online from Claritas a demographic report for the 5-mile radius from the intersection of 60th Street West and Avenue L along with the 1, 2 and 3 mile radius.

I have enclosed with this letter the Claritas Report dated Sunday, February 22, 2008.

The enclosed Claritas Report states the 2008 estimated Per Capita Income for the 5-mile radius as \$27,946.

The HR&A Economic Report states Per Capita Personal Income is \$43,559 (that is per person). The stated income of \$43,559 does not equal the \$27,946 as shown in the Claritas Demographics I obtained yesterday.

I estimate that by increasing the Per Capita Income by \$15,613, the 2008 "Aggregate Regional Market Area Income" is then increased by **\$1,400,000,000 or 1.4 Billion Dollars per Year. Yes that is "B" for 1.40 Billion Dollars that does not currently exist as stated in the Claritas report in the Primary Trade Area.**

Why is there a difference in Per Capita Income?

In the report, HR&A states they obtained the demographic information from a respected company, Claritas. HR&A also states in Appendix C that they modified the Per Capita Income using what they call a "BEA" definition.

In the HR&A report they outline in Appendix C the following definition for "BEA"

The BEA definition is a broad definition of per capita personal income that includes both money receipts and changes in assets; it usually is a substantially higher figure for a given population than the per capita amount reported by the U.S. Census, which reports a more limited concept of "money" income that is derived from estimates provided by a sample of census respondents.

I must admit I have never heard the term BEA before but I will conclude the "BROAD" definition estimates that the value of homes is always increasing, everyone's 401K plan that is invested in the stock market is always increasing, people give incorrect gross incomes when the Census is conducted by the US Government and people do not report accurate Net Incomes on their tax returns.

89-3

89-4

89-5

Ms. Jocelyn Swain
February 23, 2009
Page Three

In plain math, it means the HR&A Advisors Economic Report has inflated the 2008 Average Household Income to approximately \$131,896 by using what they term the BEA definition/recalculation instead of \$84,629 as stated in the attached Claritas Report.

89-6

I would welcome the opportunity to ask the following question to the residents in the Primary Trade Area, "Is your income closer to \$85,000 or \$131,000?"

In addition to the factual miscalculation of Per Capita Personal Income, the HR&A Economic Report has 2 hypothetical projections that are overly optimistic in the current 2009 economic environment.

89-7

The first extremely questionable assumption is the rate of increase in "Per Capita Personal Income". Not only does the Per Capita Personal Income begin with an incorrect value but also it projects an increase of approximately 25% from years 2007 to 2012.

If you use 3.0 persons per household in 2007, the HR&A Economic Report increases the Average Household income in the Primary Trade area from \$125,000 in 2007 to \$155,000 in 2012.

89-8

This difference in "Per Capita Personal Income" by what they term BEA method distorts the "Aggregate Regional Market Area Income by **\$1,750,000,000 or 1.75 Billion Dollars per Year in 2012.**

The third mathematical statement in the HR&A Economic Report that is also extremely questionable is the projected residential growth in the Primary Trade Area. The report projects an increase in population of 12,544 in the five-year period of 2007 to 2012.

In the Primary Trade Area as defined in the HR&A Economic Report, I would assume the residential growth would be almost entirely single-family homes.

Given the current economic climate, it is very questionable if the Primary Trade Area will see 4,325 homes built in years the 2007 to 2012.

89-9

I concluded the projected 4,325 residential units by dividing the projected increase in population, 12,544 by the Average Household Size of 2.9 as stated in my Claritas Report for the 5-mile trade area.

Please keep in mind that the Primary Trade Area of 5 miles encompasses the area within the City of Lancaster that is to the west of Highway 14.

I have also attached for your review page HE-C-3 from the Lancaster General plan Housing Element-Public Draft-May 1, 2008.

89-10

Ms. Jocelyn Swain
February 23, 2009
Page Four

I believe the following statement would be not be questioned by anyone given the current economy in 2009, “the increased level of residential construction in the City of Lancaster from 2004 to 2006 was as a direct result of the runaway mortgage money in the United States”.

The Lancaster Residential Construction chart that I have enclosed states that on average less than 500 units were built annually in the “Entire” City of Lancaster from 1992 to 2003.

The HR&A Economic Report again states that there will be approximately 4,325 residential units built west of Highway 14 between the years 2007 to 2012. Using historical data that has been provided by the City of Lancaster, if you exclude the runaway mortgage money years, the projections are that less than 2,500 residential units will be built in the entire city during that same period of time.

Of those projected 2,500 residential units for the entire City of Lancaster, I would expect many of those units would be built in East Lancaster.

I also believe that because of the “runaway mortgage years”, much less that 500 units will be built citywide in the City of Lancaster annually during the next 4 years.

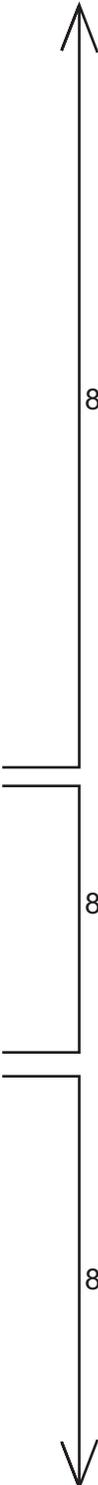
Now the question is what are the projected increase in GLA if you factor in what would be a correct Per Capita Income, a reasonable increase in the Per Capita Income and a reasonable increase in residential units?

It is my opinion the 2012 estimated “increase” in GLA of 358,418 within the Primary Trade Area as stated on Page 34 of the report is grossly inaccurate when you answer the questions in the preceding paragraph.

I want to discuss Urban Decay and it is referenced in the HR&A report on Page 48, the “Evaluation of the Project’s Potential to Cause Urban Decay”.

As I previously stated, the HR&A report projects the need for approximately 400,000 square feet of gross leasable area (GLA) for shopping centers in the “Primary Trade Area” by 2012 and it also states there is 724,727 planned GLA just at the intersection of 60 Street West and Avenue L.

Even if my mathematical calculations are not correct and the HR&A report is accurate using the questionable BEA method, the report does state there will be a “short term oversupply” of 324,727 square feet (724,727 – 400,000).



89-10

89-11

89-12

HR&A reasons the “short term over supply” will be resolved by late 2014 or early 2015.

This estimate of 2-3 years to absorb 324,727 GLA is not being realistic in these economic times just as the HR&A estimates for an increased demand in 2012 for 400,000 square feet in retail stores.

If the Economic Report is recalculated by HR&A based the Claritas Report using what I believe are correct “Per Capita Personal Income” projections for 2012 and using reasonable Residential Unit Growth, I would estimate the need for additional GLA would be drastically less than 400,000.

I highly suggest that the City of Lancaster question HR&A Advisors on the Economic Report and their methodology for deriving the “Per Capita Personal Income”, the income growth and increased housing units.

I would also suggest that the “Primary Trade Area” be a 3 mile radius given that the residents outside the 3 mile radius have the opportunity to shop at either of the 2 existing Target’s or Wal-Mart’s in both the City of Lancaster or Palmdale.

I have also had the opportunity to review the DDS Marketing Demographic Report that I believe was prepared for the Wal-Mart project.

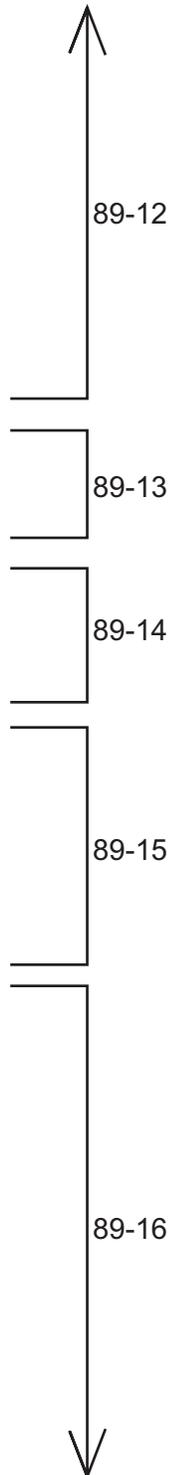
I am in no way questioning how the Wal-Mart Corporation analyzes a trade area but I believe they have come to conclusions based upon a flawed Demographic Study that was prepared by DDS.

In conclusion, I am 1 of the 2 General Partner’s for the ownership of Quartz Hill Towne Center, the Vons-CVS Shopping center located at the northwest corner of 40th Street West and Avenue L.

I do have a vested interested interest in the “proposed zone changes” at 60th West and Avenue L, as do our Limited Partners, Tenants and Lender.

I had not planned on writing or speaking my opinions concerning this subject until last night when I had a chance to review the HR&A Economic Report and compared it with my own Claritas information.

I realized I had to voice my opinion about the HR&A report that is the foundation in justifying building these 2 shopping centers.



Ms. Jocelyn Swain
February 23, 2009
Page Six

The HR&R report makes an inaccurate statement when it reasons in the summary that Quartz Hill Towne Center will not be affected by the 2 proposed centers at 60th & L.

I could be totally off base with my math/conclusions and proven completely wrong but based upon my calculations, Quartz Hill Towne Center will be devastated if these 2 shopping centers are constructed at any time in the next 10 years.

I would also conclude there would be additional Urban Decay within the trade area caused to other shopping centers in the City of Lancaster if both centers are constructed in the time period stated in the report.

Please have HR&A review the comments I have expressed in this letter.

I would recommend a neutral third party not associated with HR&A evaluate this report due to the fact that they took the liberty to expand the definition of Per Capita Income even though they state they were using information supplied by Claritas.

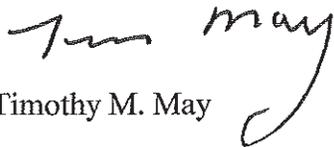
Once the Economic Report is updated, it is my opinion that it will state there will be "Urban Decay" in the Primary Trade Area with the addition of these 2 shopping centers.

If I am correct in stating the HR&A Economic Report has "major" mathematical errors, I request the Planning Commission and City Council deny the requested to "increase" the current commercial zoning at 60th Street West and Avenue L due to URBAN DECAY.

There is a reason the Report on the first page states ""Preliminary Working Draft – Not for Public Distribution".

I would welcome the opportunity to be part of any group that meets with HR&A Advisors or a neutral third party to discuss their revised Economic Report.

Sincerely;

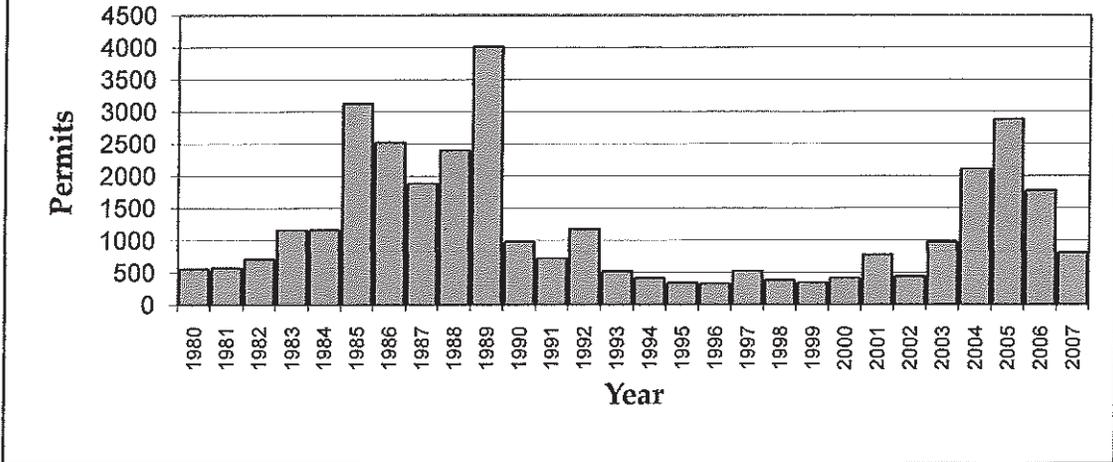


Timothy M. May

Cc: City of Lancaster Planning Commission
Mr. Mark Bozigian
Mr. Brian Ludicke

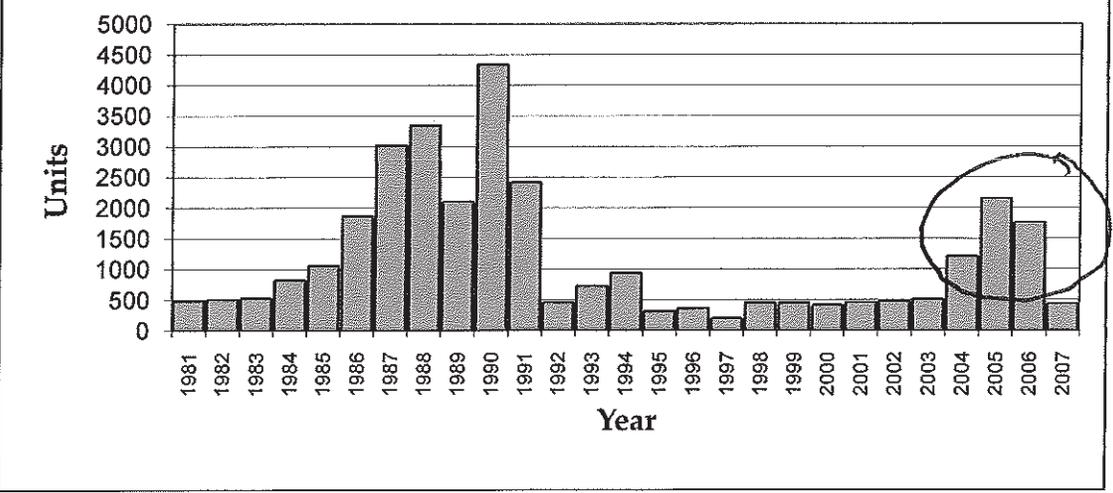
↑
89-16
89-17
89-18
89-19

Figure HE-C-1
Lancaster Residential Permits Issued
1980-2007



Source: City of Lancaster

Figure HE-C-2
Lancaster Annual Residential Construction
1981-2007



Source: State Department of Finance, City of Lancaster

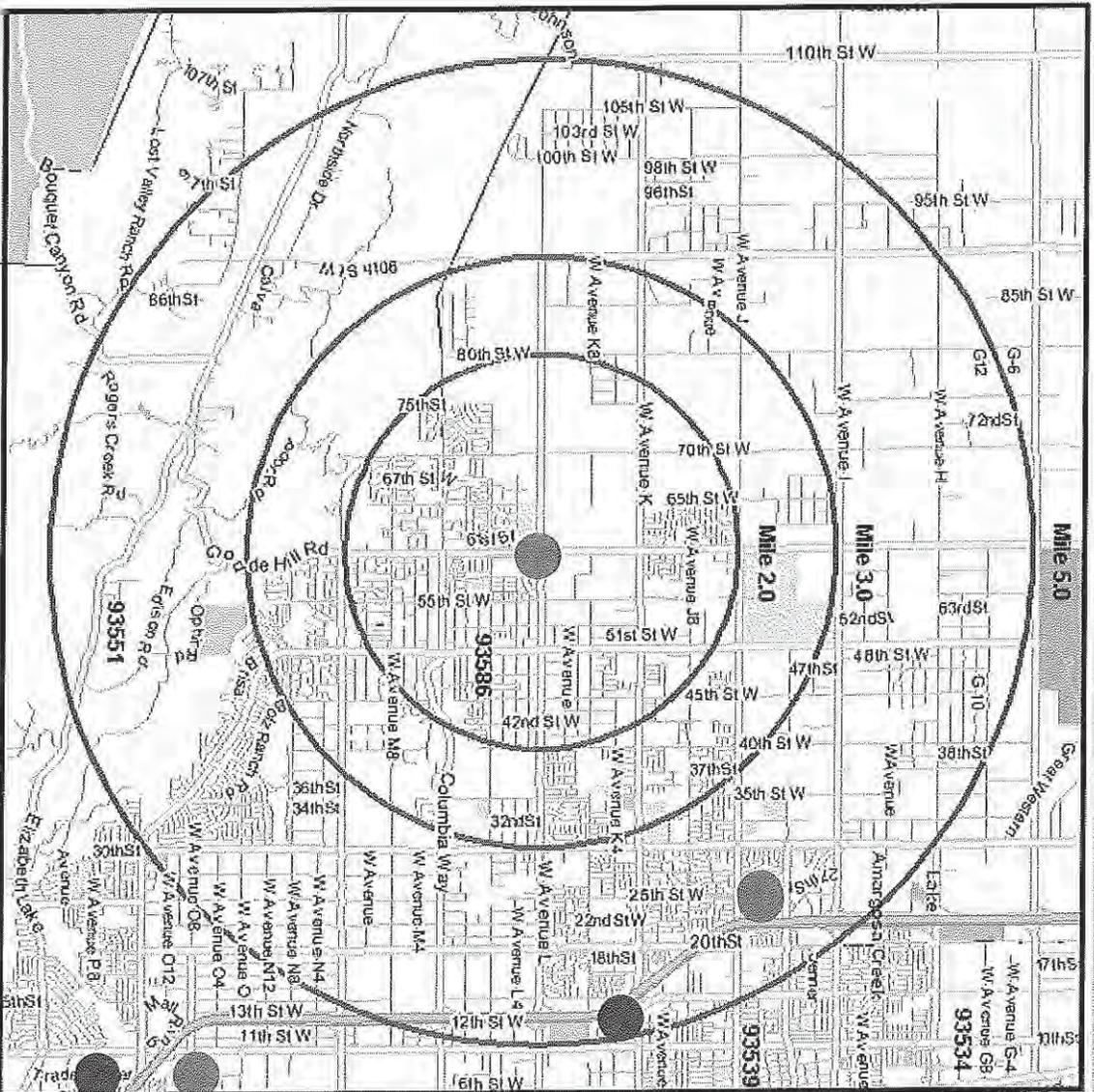
89-20
?

Prepared For:

Area Map

Order #: 967488414
Site: 01

60TH ST W AT W AVENUE L
LANCASTER, CA 93536
Coord: 34.660224, -118.236318
Radius - See Appendix for Details



	Point
	Interstate Highways
	US Highways
	State Highways
	Major Highways
	Major Roads
	Roads
	Railroads
	Landmarks
	Parks
	Hydrography
	Airports
	Zip Code
	State
	Ocean



Prepared on: February 22, 2009
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Pop-Facts: Demographic Quick Facts Report

Radius 1: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Radius 2: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Radius 3: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Description	0.00 - 2.00 miles		0.00 - 3.00 miles		0.00 - 5.00 miles	
	Radius 1	%	Radius 2	%	Radius 3	%
2008 Est. Households by Household Income	7,567		12,909		29,099	
Income Less than \$15,000	861	11.38	1,205	9.33	2,566	8.82
Income \$15,000 - \$24,999	656	8.67	939	7.27	2,127	7.31
Income \$25,000 - \$34,999	369	4.88	801	6.20	2,099	7.21
Income \$35,000 - \$49,999	816	10.78	1,436	11.12	3,265	11.22
Income \$50,000 - \$74,999	1,162	15.36	2,144	16.61	5,574	19.16
Income \$75,000 - \$99,999	1,071	14.15	1,878	14.55	4,463	15.34
Income \$100,000 - \$149,999	1,542	20.38	2,699	20.91	5,812	19.97
Income \$150,000 - \$249,999	889	11.75	1,408	10.91	2,521	8.66
Income \$250,000 - \$499,999	146	1.93	302	2.34	509	1.75
Income \$500,000 and over	54	0.71	96	0.74	162	0.56

89-21

2008 Est. Average Household Income	\$88,246	\$90,400	\$84,629
2008 Est. Median Household Income	\$73,248	\$74,167	\$70,146
2008 Est. Per Capita Income	\$30,280	\$27,877	\$27,946



Pop-Facts: Demographic Quick Facts Report

Appendix: Area Listing

Area Name:

Type: Radius 1

Reporting Detail: Aggregate

Reporting Level: Block Group

Radius Definition:

60TH ST W AT W AVENUE L
LANCASTER, CA 93536

Latitude/Longitude 34.660224 -118.236318
Radius 0.00 - 2.00

Area Name:

Type: Radius 2

Reporting Detail: Aggregate

Reporting Level: Block Group

Radius Definition:

60TH ST W AT W AVENUE L
LANCASTER, CA 93536

Latitude/Longitude 34.660224 -118.236318
Radius 0.00 - 3.00

Area Name:

Type: Radius 3

Reporting Detail: Aggregate

Reporting Level: Block Group

Radius Definition:

60TH ST W AT W AVENUE L
LANCASTER, CA 93536

Latitude/Longitude 34.660224 -118.236318
Radius 0.00 - 5.00

Project Information:

Site: 1

Order Number: 967488414



Pop-Facts: Demographic Quick Facts Report

Radius 1: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Radius 2: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Radius 3: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Description	0.00 - 1.00 miles		0.00 - 2.00 miles		0.00 - 3.00 miles	
	Radius 1	%	Radius 2	%	Radius 3	%
Population						
2013 Projection	6,544		23,812		47,509	
2008 Estimate	6,057		22,107		43,514	
2000 Census	5,279		19,517		37,096	
1990 Census	3,209		13,285		27,184	
Growth 1990 - 2000	64.51%		46.91%		36.46%	
Households						
2013 Projection	2,268		8,086		14,213	
2008 Estimate	2,129		7,567		12,909	
2000 Census	1,897		6,754		10,788	
1990 Census	1,215		4,646		8,328	
Growth 1990 - 2000	56.13%		45.37%		29.54%	
2008 Est. Population by Single Classification Race						
	6,057		22,107		43,514	
White Alone	4,421	72.99	16,680	75.45	30,203	69.41
Black or African American Alone	675	11.14	2,065	9.34	5,732	13.17
American Indian and Alaska Native Alone	42	0.69	171	0.77	347	0.80
Asian Alone	251	4.14	880	3.98	1,953	4.49
Native Hawaiian and Other Pacific Islander Alone	13	0.21	55	0.25	100	0.23
Some Other Race Alone	351	5.79	1,218	5.51	3,164	7.27
Two or More Races	304	5.02	1,038	4.70	2,016	4.63
2008 Est. Population Hispanic or Latino						
	6,057		22,107		43,514	
Hispanic or Latino	1,052	17.37	3,518	15.91	7,941	18.25
Not Hispanic or Latino	5,005	82.63	18,589	84.09	35,573	81.75
2008 Tenure of Occupied Housing Units						
	2,129		7,567		12,909	
Owner Occupied	1,484	69.70	5,700	75.33	9,904	76.72
Renter Occupied	645	30.30	1,867	24.67	3,006	23.29
2008 Average Household Size						
	2.83		2.91		2.98	



Pop-Facts: Demographic Quick Facts Report

Radius 1: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Radius 2: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Radius 3: 60TH ST W AT W AVENUE L, LANCASTER, CA 93536, aggregate

Description	0.00 - 1.00 miles		0.00 - 2.00 miles		0.00 - 3.00 miles	
	Radius 1	%	Radius 2	%	Radius 3	%
2008 Est. Households by Household Income	2,129		7,567		12,909	
Income Less than \$15,000	307	14.42	861	11.38	1,205	9.33
Income \$15,000 - \$24,999	253	11.88	656	8.67	939	7.27
Income \$25,000 - \$34,999	138	6.48	369	4.88	801	6.20
Income \$35,000 - \$49,999	181	8.50	816	10.78	1,436	11.12
Income \$50,000 - \$74,999	341	16.02	1,162	15.36	2,144	16.61
Income \$75,000 - \$99,999	311	14.61	1,071	14.15	1,878	14.55
Income \$100,000 - \$149,999	416	19.54	1,542	20.38	2,699	20.91
Income \$150,000 - \$249,999	156	7.33	889	11.75	1,408	10.91
Income \$250,000 - \$499,999	19	0.89	146	1.93	302	2.34
Income \$500,000 and over	8	0.38	54	0.71	96	0.74
2008 Est. Average Household Income	\$73,810		\$88,246		\$90,400	
2008 Est. Median Household Income	\$63,633		\$73,248		\$74,167	
2008 Est. Per Capita Income	\$26,103		\$30,280		\$27,877	



Pop-Facts: Demographic Quick Facts Report

Appendix: Area Listing

Area Name:

Type: Radius 1

Reporting Detail: Aggregate

Reporting Level: Block Group

Radius Definition:

60TH ST W AT W AVENUE L
LANCASTER, CA 93536

Latitude/Longitude 34.660224 -118.236318

Radius 0.00 - 1.00

Area Name:

Type: Radius 2

Reporting Detail: Aggregate

Reporting Level: Block Group

Radius Definition:

60TH ST W AT W AVENUE L
LANCASTER, CA 93536

Latitude/Longitude 34.660224 -118.236318

Radius 0.00 - 2.00

Area Name:

Type: Radius 3

Reporting Detail: Aggregate

Reporting Level: Block Group

Radius Definition:

60TH ST W AT W AVENUE L
LANCASTER, CA 93536

Latitude/Longitude 34.660224 -118.236318

Radius 0.00 - 3.00

Project Information:

Site: 1

Order Number: 967488420



Atten: Jocalyn Swain, Assistant Planner -- Environmental
Lancaster City Hall
44933 North Fern Ave.
Lancaster, CA 93534



Regarding the Draft EIRs for the proposed developments on Ave L and 60th Street West in Lancaster at the boarder of Quart Hill, attached are the comments I had regarding the proposed developments. I have many more concerns than I had time to include in this tight 45 day deadline.

90-1

We hope you can make sure these issues are address in the final EIRs.

Thank you,
Michael and Cleo Goss
611 Landau Place
Quartz Hill, CA
93536

The name Quartz Hill Commons is offensive. This may be a 'common', yet one more superstore strip mall but it is not on Quartz Hill property. Just like Lancaster objected to the city name being used on the sign for the LA County prison, Quartz Hill residents and businesses object to Quartz Hill name being associated with a Lancaster commercial site because patrons may be fooled into thinking this is Quartz Hill's business district.

90-2

Deficiencies

The school zone is not limited to only the school property. School zone warning signs and reduced speed limits are posted well beyond the school boundary. The schools nearby and across the street from the proposed commercial centers are a major environmental element in the neighborhood of Ave L and 60th Street West. Rezoning to commercial will have a major affect on the school environment and this should be addressed in the Environmental Impact Report.

90-3

1. Truancy is not addressed at all in the Draft Environmental Impact Report but it is a concern many specifically requested to be included. Truancy will be a problem for both Joe Walker Junior High School and Quartz Hill High School.

a. Truancy will cost parents time off from work to attend court and money to pay the truancy fines.

90-4

b. Truancy will decrease federal funding. On February 15th, 2009 the AVPress reported that student attendance is critical to the districts cash flow revenue. Schools are only paid when a child attends. Currently there is no fast food and commercial places for students to hang out within walking distance of the schools. Reducing attendance by a single percentage point reduces federal funding by \$1 million dollars.

c. The AM/PM on the corner of Ave L-8 and 60th is the only commercial store within walking distance from the schools. They will only allow a limited number of students in the store at a time and none with backpacks to prevent shop lifting and other problems?

90-5

d. Placing fast food across the street will increase childhood obesity. Students will stop at fat-food establishments on their way to and from school. Schools have worked hard to provide students with healthy snacks and lunches. Vending machines are no longer stocked with junk food. Who has the will power to eat healthy when the smell of greasy fried foods reminds you they are just a step away? Many figure conscious students will resort to a finger down the throat to correct their overeating. Students who are not allowed to leave campus for lunch will sneak off and not bother to return to school afterwards.

90-6

It doesn't take much to temp some students away from school, placing 2 shopping centers directly across the street will be too much to resist. No other school in the Antelope Valley is surrounded by super sized commercial centers. Why has the Draft Environmental Impact Report failed to include truancy in its investigation? The Draft Environmental Impact Report needs to investigate all the affects of rezoning to commercial in a school zone will have on the students. The stores should provide funding for the additional truancy officers that will be needed to police the students.

90-7

2. The affects of building large commercial centers on the values of homes in the neighborhood is not addressed at all in the Draft Environmental Impact Reports but it is a concern many specifically requested to be included.

a. Many home owners purchased their homes in this rural/residential neighborhood to escape the urban city environment. These proposals will completely change the character of the neighborhood. Many home owners will wish to move to escape the encroachment of commercial into the neighborhood and the problems that will bring. Who would want to buy a home that faces the delivery area of a major shopping center?

90-8

b. With not one but two super center discount stores on the same corner, what will happen to the property value of homes? Homes in this area were consider by realtors and potential home



owners as the most desirable in the Antelope Valley and commanded higher prices than a similar home built on the eastside. If these commercial centers are built the neighborhood will no longer be desirable and property values will drop.

- c. The people who would like to live within walking distance of two discount super centers are not the people who can afford to live in the neighborhood.

Why has the Draft Environmental Impact Report failed to include the change in property values in its investigation? The impacts the commercial centers will have is not limited to those sites only. Quartz Hill properties adjoining the commercial centers and Palmdale properties a mile down the road will also be affected. The Environmental Impact Report needs to investigate the downward change in property values to the homes in the surrounding area and develop a strategy that will allow fleeing residents a monetary compensation for the reduced property values these centers will cause.

90-8

3. The affects of trash generated from the stores and fast food establishments is not addressed at all in the Draft Environmental Impact Reports but it is a concern many specifically requested to be included.

- a. There is no way to prevent the wind from blowing plastic bags, fast food packaging and other trash onto residential property or the surrounding land. How will this be mitigated? The commercial shopping centers need to provide weekly if not daily litter removal.
- b. Abandoned shopping carts will end up on residential property and streets. Residents already living near commercial centers recount the problem of shopping carts that block residential streets. How will this be mitigated? The commercial shopping centers need to police the residential areas for abandoned shopping carts and remove these eye sores and street hazards.

90-9

4. The Draft Environmental Impact Report did not bother to include the suggestion of turning the Lane Ranch property into a historical museum. This idea was publicized in the AVPress years ago and it was included in the public comments appendix of the report. The DIER introduction indicated alternatives would be evaluated under public services and did mention that a museum was suggested as a better use for project site but the museum alternative was never evaluated as an alternative in the DIER for Lane Ranch.

90-10

5. A park alternative was suggested for the Commons project and this suggestion was included in the public comments appendix. The Draft Environmental Impact Report mentioned the park alternative but dismissed without a proper evaluation, claiming it was infeasible because the city does not own the property. Doesn't the city know they can purchase the property from Wal-Mart? If the city does not rezone the land to commercial the property will remain residential and be worthless for a company that wants to build commercial. Wal-Mart would likely sell the property to the city to purchase more suitable property; property not across from a school, property near the freeway, property already zoned commercial and that already has multiple lane access. The business area near Ave G fits the bill. Wal-Mart may even resell the residential land at Ave L and 60th to the city at a discount rate since they are in the business of discounting.

90-11

6. The Draft Environmental Impact Report for the Commons project also dismisses moving the project to an alternative site as infeasible. The report claims the impacts of the project would remain the same. Moving the project so it is not across the street from the high school will definitely make a difference to its impact on both schools. Moving the project to an already commercially zoned area with multiple lane access will definitely make a difference to the cost of road improvements and maintenance as well as eliminate the impact to residential neighborhood of Ave L and 60th Street West. The Final Environmental Impact Reports need to give serious consideration to the public's suggestions and not just claim it is infeasible to avoid inclusion in the Final Environmental Impact Reports.

90-12

Inadequacies

Summary for Aesthetics

1. The visual mix between residential and commercial land uses impacts the 'small town feel' of the neighborhood. It will be an abrupt change between the unincorporated Los Angeles County Urban 1 designation of single family semi rural homes in the unincorporated area to a mega discount super strip mall type urban commercial center. The compatibility between the adjoining Lancaster City and Los Angeles County land use and the difference in development standards needs to be addressed. Many residents moved to the area to escape the noisy, traffic and crime congested urban centers. These projects will forever change the local neighborhood and desirability of living in the Westside Quartz Hill area.
2. The DEIR does not mention electronic billboards. Will the use of electronic billboards be prohibited?
3. The one and only existing commercial store on 60 Street West an AM/PM located on 60th and L-8. When this store was built, the height of the sign allowed at that time was just off the ground. Lancaster's standard of no taller than the roof of the building, meaning into resident's homes and seeable for miles away creating a nuisance for not just the residents adjacent too the projects but for every residential within miles.

90-13

90-14

Environmental overview provides a table of 82 foreseeable future projects. The 82 future projects in conjunction with the 2 projects on the corner of Ave L and 60th Street West could produce a cumulative impact on the area. The majority of the 82 projects are located in Lancaster. Most of the future projects are 3 miles away from the site. There is 1 park and 2 schools with 76 housing projects. When is it envisioned that the 76 housings projects will be complete? In the current over stocked housing market will they ever be built? Only 3 projects of the listed 82 projects are identified as retail, the two Ave L & 60th projects and another project in Quartz Hill. In the current economic recession/depression how many of the retail shops in these projects will be filled? Will these shopping centers be just another strip of vacant shops anchored by two competing super discount stores?

90-15

Summary for Air Quality claims building these super centers will reduce emissions by providing retail service to the local community. The local community already has shopping for everything these super center will provide. Quartz Hill business district located 1 mile from the site already provides:

2 restaurants	3 fast-food
3 cafes	2 pizza shops
5 beauty salons	1 barber shop
2 antique stores	1 boutique
1 drug store	1 dairy
1 garden shop	1 feed store
2 auto repair stores	2 body shops
4 tire stores	2 gas stations
1 auto-parts store	1 hardware & lumber store
5 convenience stores	3 veterinary clinics/ hospitals
1 bank	1 equipment rental store

Total of 67 stores

Including many little shops: karate, dance studio, skate board store, florist, laundry mat, urgent care, dental, post office, etc

The Albertsons shopping center (3 miles away on Ave N & 60th) offers:

1 grocery store	1 drug store
1 bank	4 fast-food & 1 café

Many little shops: nail & tanning salon, dry cleaners, video rental, boutique etc.

The Albertson's shopping center located 3 miles from this site and the

Vons shopping center located (2 miles away on Ave L& 40th) offers:

1 grocery store	1 auto-parts store
-----------------	--------------------

90-16

2 banks
1 pet store
1 restaurant
Many little shops: donut, ice cream, dry cleaners, video rental, hair & nail salon, pool supply, tanning salon etc.

1 drug store
1 electronics store
2 fast-food & 1 pizza

These super centers will off nothing new to the local community. Most of the local residents live closer to the three existing shopping centers than they do to this site so driving further to reach this site will increase emissions not reduce them.

90-16

Summary for Construction impacts. The last projects developed in this neighborhood, housing tracts, caused significant damaged to resident's vehicles who were trying to enter or leave their property. In my household alone we had 3 flat tries from nails and a bolt. Many other residents as far away as a mile also had flat tries due to nails and one from sheet metal debris. The projects should establish a fund to replace or repair resident's tires that are flatten by construction debris

90-17

Summary for Odors. Odors from the fast food and restaurants associated with the projects is not consistent with odors from existing residents and restaurants in the area.

1. There are no restaurants or fast food in the area. The closest fast-food and restaurants are over a mile away.
 2. No residential cooking produces the quantities of smells that a fast food or restaurant does.
 3. No resident cooks 24-7.
 4. Very few if any resident fry and grill food on a regular basis. These odors are most offensive.
 5. Instead of scraping food off their grill, many fast food establishments burn it off creating both odor and air pollution.
 6. Many if not all fast food establishments will reuse their grease from the day before. Even if they change the grease on a daily basis they are still reusing the grease with every fish or French fry order.
- Any odors coming from these projects would have a significant impact to residents within a mile of the projects, increasing the odors by 100%.

90-18

Summary for Erosion and Topsoil. Since the projects are projected to take at least 1 year for construction they will experience periods of rain. It does not have to rain heavily in the area for flooding and erosion to occur. All the water from the surrounding roads runs through the sites on the way to the lowest laying ground. Every time a storm catch basin is emptied it floods the area. What exactly is the migration methods envisioned? How will it be policed, especially if the catch basin release comes from a Los Angeles or Palmdale storm basin?

90-19

Appendix Aesthetics.

1. Both the Lane Ranch and Commons project's plans include tall towers, 42-feet and 41.6 feet in height. Neither Quartz Hill High School nor Joe Walker junior high school consists of two story buildings. There are no residential homes in the area that are 41 or 42 feet high. The proposed landscaping will not screen these structures from view. This creates a substantial change in the visual character of the neighborhood from its current rural ranch setting.
2. The statement that the 'General Plan' envisions the transformation of the current rural condition to urban uses only applies to Lancaster property, not to Los Angeles' plan for unincorporated Quartz Hill which directly borders these projects. Palmdale is only a mile away and has a different general plan for its land use.
3. The statement that the project area is already urbanized with a mixture of institutional, commercial and residential uses contradicts the statement above about transforming the current rural use to urban. 60 Street is currently not urban. There is one and only one existing commercial store on 60 Street West, the AM/PM located on 60th and L-8. Except for the one AM/PM store 60 Street starting from the city of Rosamond, through Lancaster, unincorporated Quartz Hill, and the city of Palmdale,

90-20

90-21

90-22

ending at Lake Elizabeth Road in Leona Valley is consistently a rural, residential road. There are ranches, farms, open desert, houses, and a vineyard. These projects do not fit in with the current land uses. The building of these projects will forever change the style and ambiance of the neighborhood community.

4. Urban decay focuses on whether the retail and dining planned exceeds the likely anticipated demand due to population growth and per capita personal income. In the current over stocked housing market will the 76 foreseeable future housing projects ever be built? If the housing projects never happen or only occur in the distant future than the anticipated population growth will not happen or will be drastically reduced. In these troubled economic times there is little incentive for residents with upside down home mortgages to spend their limited funds on gardening and other home improvements. Increasing foreclosures in the area reduce the number of residents and increase the number of residents on state or federal housing assistance thus reducing the overall incomes of area residents. With increasing job losses and tighten job market, residents will reduce their over all spending and eliminate non essential spending such as eating out. In the current economic recession/depression how many of the retail shops in these projects will be filled? How many will be able to remain open? The DEIR concludes with these projects the retail and dining demand will be increased to 145 %. It further prophesizes this excess supply would likely be a short-term phenomenon. Even President Obama believes we have not reached the bottom of our current economic troubles and economic forecasters predict years before a recovery. All the above mention issues creates a perfect storm for urban decay as competing stores fight to obtain shoppers and survive the economic conditions. At the time the DEIRs were developed the current economic crisis had not happen and any anticipated demand due to population growth and per capita personal income is no longer accurate.

Air Quality Appendix

1. Emissions for predicted pollutants in the proposed project vicinity used a dispersion model for predicting concentrations from a 1996 Bay Area Air Quality Management District instead of using a methodology from the local Air Quality Management District? Is this an apple to oranges comparison, a beach environment instead of desert environment with different inversion layers, prevailing winds, and regional pollution patterns, outside sources of additional pollutants, peak pollution seasons and daily times? Isn't there a newer methodology than one that is 13 years old?
2. Emissions were modeled based on rates given in the traffic study. The traffic study rates are not representative of peak hours and the numbers differ based on the item be accessed, where current air quality and current noise modeling have higher counts than the numbers given in the traffic study.
 - a. The results for operational activates is shown in table IV. D-8 of both DEIRs and shows that the thresholds set by AVAQMD would be exceeded thus resulting in a significant impact to air quality.
 - b. Assumptions were then made that vehicles would travel a maximum of 0.1 miles within the project site. This is a false assumption since the number of patrons needed to keep the two projects' numerousness stores open can not be found within a 0.1 mile radius and the economic evaluation identifies drawing in customers from as far away as Leona Valley.
 - c. Table IV. D-9 for both DEIRs differs in emission values with the Lane Ranch project showing lower levels of CO and NOx operational levels than the Commons project even though the Lane Ranch project is larger with 394,575 square feet verses 344,550 square feet for the Commons. In this table the Lane Ranch project modeled localized emissions to a level that would not create a significant impact to air quality. The Commons project found a significant impact in operational air quality. Why does the Lane Ranch not have the same significant unavoidable impact when it is across the street from form the Commons project? Does the air quality magically change depending on the side of the street you are standing on?
3. The monitoring station at Division is miles away from the actual site where the emissions come in direct contact with exercising students and residents. The air off the Division is located in an urban

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area and is likely more polluted than the current air at 60th Street West and Ave. L Ranch property and Commons vacant lot.

4. All estimates of current air quality for the surrounding intersections were modeled rather than sampled. As identified above the models are out dated and not compatible with a desert environment. The varying traffic peaks were used to model future emissions. If the input data to a model is questionable then the output from the model is also questionable. Garbage in garbage out.
5. Every store, bank, restaurant, and the majority of fast food stores use armored vehicles to pick up their money and all armored vehicles idle while picking up money. Armored vehicles were not addressed in either DEIR and based the number of stores, shops, banks and restaurants associated with these projects operationally there will be a large number of idling armored vehicles. Competing businesses do not armor vehicle or truck pool.
6. Green house gas emissions to the generation of diesel fuel for the numerous diesel delivery trucks and armored vehicles to global warming were not assessed.
 - a. Diesel performance may mean better fuel economy and less carbon dioxide but it takes about 25% more oil to make a gallon of diesel fuel than a gallon of gasoline, so fuel efficiency needs to be taken in terms of "oil equivalents" and adjust the mileage claims for diesel vehicles downward by about 20% when comparing them to gasoline-powered vehicles.
 - b. US Department of Energy modeling has shown the greenhouse gas affects of diesel is more oil and carbon-intensive than reformulated gasoline. Making a gallon of diesel fuel requires 25% more oil and emits 17% more heat-trapping greenhouse gases than gasoline reformulated gasoline. Similarly, diesel requires 17% more oil and emits 18% more heat-trapping gases than gasoline reformulated with ethanol. This means that diesel fuel's advantages from its higher per-gallon energy content and better performance on greenhouse gases are at least partially offset by the impact of diesel's fuel-production process.

The final EIR needs to compare the current air quality at the school sites to data gather from existing stores of comparable size to see what the true increase in pollution will be. The data gathered from the school and the data from existing stores need to cover more than a few hours in the day since these stores will be open 24-7. A model that estimates air pollution based on estimated traffic is only as good as the input data and that is not representative.

Air Quality Data inserted on page 642 for the Commons project and page 657 for the Lane Ranch project.

1. Air Quality data claims more traffic than is found in the Traffic data. How can this be, is there another traffic count and if so why isn't it used to for the Traffic analysis? For example the difference at the Ave L and 60th intersection is:

8/28/07 Traffic data	Air Quality data	6/2/07 Traffic data for Saturday	Air Quality data for Saturday
northbound			
NL NT NR	NL NT NR	NL NT NR	NL NT NR
22 278 113	22 284 115	17 191 105	17 195 107
southbound			
SL ST SR	SL ST SR	SL ST SR	SL ST SR
83 375 18	85 383 18	66 229 12	67 234 12
eastbound			
EL ET ER	EL ET ER	EL ET ER	EL ET ER
35 288 14	36 294 14	24 121 10	24 123 10
westbound			
WL WT WR	WL WT WR	WL WT WR	WL WT WR
108 198 76	110 202 78	128 168 116	131 171 118

Note there was only one traffic collect on Saturday so traffic counts used in Traffic analysis should be identical to the traffic counts in Air Quality analysis.

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2. Peak traffic data is not representative of actual traffic. The supposed 'AM peak' hour captures only the last half hour of school traffic. The PM peak hour does not capture school traffic at all; it was taken an hour or more after school let out (junior high school lets out earlier than the high school). For example the difference in exiting traffic according to Air Quality data between AM and PM traffic on Ave L and 60th shows:

northbound AM	PM	Difference between AM&PM peak
NL NT NR	NL NT NR	NL NT NR
22 284 115	65 225 136	43 59 21
southbound AM		
SL ST SR	SL ST SR	SL ST SR
85 383 18	109 253 28	24 130 10
eastbound		
EL ET ER	EL ET ER	EL ET ER
36 294 14	75 81 50	39 213 36
westbound		
WL WT WR	WL WT WR	WL WT WR
110 202 78	150 182 85	40 20 7

So the majority of differences between AM & the tail end of school traffic and PM with no school traffic is 53.5. Did students fly over the intersection on their way to school or did the 3,200 cram into 53 additional cars?

- 4. What's with the average speed estimates? Everything says current speed is 20 mph when the posted speed limits are either 45 mph or 55 mph. 90-33
- 5. How come future estimates have a 5 mph estimate? Is this because the traffic is going to be so bad, that it only moves 20 mph or is this to reduce estimated emissions? 90-34
- 6. How come PM average speed is the same 20 mph as the AM speed when PM traffic did not capture school commuters. 90-35
- 7. Travel Conditions are not reflective of the area, most residents travel more than 12.7 miles to work, many travel 30 - 60 miles or more. The 12.7 estimate must be for inner city dwellers. Travel speeds listed appear to also be suited for inner city rates with an average 30 mph, instead of the 55 mph speed posted on most rural roads and 65 - 70 freeway speeds. 90-36
- 8. Where did the operational emission estimates for store types come from? The emissions from the stores doesn't state the size of the establishments used in the comparison, are they the same size buildings as the proposed buildings? Where are the emissions for the restaurants and fast food establishments? 90-37
- 9. Under Operational Settings - Summary of Land Uses lists store unit types as all being 1,000 sq ft. not the sizes of the proposed stores ranging from 177,390 sq ft. - 5,000 sq ft Once again comparing oranges to grapefruit, it may be a citrus but size makes a difference so the numbers given for total trips are not valid. 90-38
- 10. What is the Receptor Pathway data and colored pictures depicting, it is not explained. All options are not in use (data particles, seasonally emission rate, monthly emission rate, wind speed, etc.) and sources are not specified (points, volume, area, etc.). It looks like filler data to increase page counts. 90-39
- 11. What is the Meteorological Station data? Why use 1981 data from 28 years ago. Again sources are not specified (points, volume, area, etc.). 90-40

Health Risk Assessment inserted on page 784 for the Commons project and on page 801 for the Lane Ranch project. All the following references to pages numbers is for the Health Risk Assessment.

- 1. Page 4 states since there is no acute toxicity factor for diesel exhaust, they do not evaluate the acute short term non-cancer health effects. It ignores the affects of diesel soot and air pollution from increase traffic. 90-41

- a. In 1998 California Air Resources Board identified diesel particulate matter as a toxic air contaminant. Because of its potency and the large amount of diesel emissions in California, diesel is the number one contributor to adverse health effects of any toxic air contaminant known today. When it comes to smog-forming pollutants and toxic particulate matter, also known as soot, today's diesels are still a lot dirtier than the average gasoline car. Fine and ultra-fine soot particles (less than 2.5 microns) are the most successful at invading your body—they're small enough to travel deep into your lungs. Once there, these soot particles can irritate and mutate the most sensitive tissues in your lungs, your alveoli. These air sacs exchange oxygen and carbon dioxide from the air you breathe with blood in your capillaries, thus allowing your circulatory system to carry oxygen to the rest of your body. Soot particles, however, make this task more difficult because they cause inflammation and scarring of the alveoli. This also strains your heart because it must work harder to compensate for oxygen loss.
2. Page 4 notes that the non-cancer health impacts from inhalation exposure to diesel exhaust usually outweighs the multipathway cancer risk from the speciated compounds. The focus should be on the exercising students and residents directly exposed to the diesel exhaust more than the cancer effects of exposure to diesel exhaust.
- a. Soot particles come directly from the tailpipe and contribute to unhealthy levels of particulate matter (PM) in the air. In addition, the gaseous tailpipe emissions of nitrogen oxides (NOx) and sulfur oxides (SOx) from diesel engines form additional particulates when they react with other atmospheric agents.
- b. Soot tends to fall out of the atmosphere close to the source of the pollution. The further you are away from diesel exhaust sources, the better for your health. Using data from a monitoring station six miles away does not give a valid reading of soot exposure to students and residents who live and attend classes close to the pollution source.
- c. Soot causes chronic bronchitis and asthma. These conditions occur when the linings of your lung's bronchioles (air passageways) become irritated and swollen, in turn causing your lungs to create mucus to soothe the irritation. These conditions prevent your bronchioles from moving oxygen to the rest of your body. Symptoms can range from coughing and shortness of breath to severe and fatal attacks of oxygen loss.
- d. Soot particles reduce the respiratory system's ability to fight infections and remove other foreign particles.
- e. Individuals with preexisting respiratory conditions, children, and the elderly are the most vulnerable to soot's lasting and deadly effects. People with heart disease, emphysema, asthma, and chronic bronchitis suffer from increased hospital admissions and emergency room visits as a result of exposure to soot. Children suffer disproportionately from asthma and other respiratory conditions, about one in thirteen children have asthma. Asthma is the most common chronic disease of childhood and a leading cause of disability among children. The office of Environmental Health Hazard Assessment in 2001 sampling thousands of students who attend schools along busy roadways found a 5-10% increase in asthma and bronchitis. Air pollution effects on asthma and bronchitis are identified in the Health Risk Assessment but no mitigation measures were given.
- f. Children—and their developing lungs—suffer more acutely from breathing in diesel soot. Children are outdoors more often and breathing in more air per body weight than adults do. Children breathe at a rate of 20 breaths per minute and infants 20-40 breaths per minute.
- g. The American Lung Association warns against exercising near high-traffic areas and 2003 CA law prohibits construction of public schools within 500 feet of busy roadways. All students must participate in physical education and many of the sports programs practice/play outdoors. Athletes breath rate peaks at 60 -70 breaths per minute.
- h. The average respiratory rate of a healthy adult at rest is 12 breaths per minute and 35-45 breaths per minute when exercising strenuously.

- 3. Page 3 of the Commons project anticipates only the Wal-Mart Supercenter and the 2nd major anchor will receive deliveries via diesel-fueled heavy duty trucks. It anticipates 5 trucks per day for the Wal-Mart Supercenter
 - a. Where did the 5 trucks per day estimate come from? Is it the actual number of trucks that an existing super center of compatible size requires? 90-43
 - b. The 2nd anchor store estimated 3 deliveries per day. Where did this number come from? The project should already have a 2nd major anchor signed up by now and can use the actual number of trucks required to service a store of compatible type and size.
- 4. Page 10 of the Lane Ranch project anticipates the Home Depot and Major 1 store will together receive 18 trucks per day. It further states that that no Transport Refrigeration Units were used in the modeling.
 - a. Page 3 identifies Home Depot as one of the 2 major stores but does not identify Super Target as the other major store. Why is the identification of the second major store is not disclosed in the health risk Assessment when it is identified else where in the DEIR? 90-44
 - b. A Target Supercenter will require Transport Refrigeration Units to bring in the frozen foods, fresh produce, meat, and dairy on a daily bases.
- 5. In both DEIRs emissions were modeled, why couldn't they take actual readings at existing stores of compatible type and size?
 - a. Only the deliveries for the 2 major anchor stores were used in the model, none of the many other shops, restaurants, or fast food deliveries were included. The total number of diesel-fueled heavy duty trucks delivering on a daily basis for just those 4 stores is 26! 90-45
 - b. Estimate exposure was calculated based on respiration rates and the modeled emissions. What value was used as a respiration rate? The rate of an adult at rest, the rate of a child or infant, the rate of an asthma suffer, the rate of an adult exercising or the rate of an athlete? It looks like the only person evaluated was an adult at rest.
- 6. Both projects do not include the Transport Refrigeration Units (TRU) of the restaurants and fast food stores that will be required on a daily bases to deliver the frozen foods, fresh produce, meat, and dairy products used by the restaurants and fast food stores.
 - a. Estimates should be gathered from existing stores, fast-food and restaurants of the same size and type. Each commercial chain should have already in existence at least one store of the same size since most use a cookie cutter type building plan for their stores. 90-46
 - b. Transport Refrigeration Unit ATCM adopted in February 2004 increase standards for TRUs requiring TRUs older than 7 years to be rebuilt to meet the more stringent emission standards. How old are the TRUs used by the fast-food and restaurant chains? How old are the TRUs of the super centers?

The final EIRs need to include the actual number of diesel delivery trucks and TRUs required to supply the Super Target. It needs to include the number of TRUs required to service all the restaurants and fast food stores of within both projects. It needs to include the affects of soot and increased air pollution due to an increase in traffic at the projects' site where proximity to the source is a critical health factor. It needs to include different breathing rates of exercising adults & children in the calculations of health risks and soot. 90-47

Asphalt parking lots and stores are a source of heat – absorbing the sun all day and radiating it out after sunset. If night time temperatures remain high the following day begins hotter and this cycle continues; creating an island of heat. Residents in the surrounding area, as well as, the stores in the complexes will have to use more power to overcome this heat source.

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Land Use Planning Appendix – Many residents expressed concerns about a decrease in their property value if these commercial centers are developed, especially the residents whose homes will face the delivery end of the centers. The introductory identified land use was the location where this concern would be addressed, it was not. A search of the DEIR for property value found this concern was not addressed at all. Through no fault of their own, home owners will have to suffer a decrease in their home values without any compensation what so ever from the creators of this monitory disaster and degrading quality of life issue, trash, traffic, noise and light pollution.

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Noise Appendix

1. The traffic noise model used, FHWA-RD-108, to predict noise for road segments and intersections is over 20 years old.
 - a. The vehicle noise emissions database was collected in the mid 1970s.
 - b. The vehicle database contains no data for vehicles subject to interrupted flow conditions, unlike the conditions the roads and intersections that were modeled in the DEIRs. These roads will be subject to stop and go traffic and multiple signal light stops as well as jay walking students.
 - c. A newer FHWA traffic noise model was released in 1998 and upgraded 7 times since release. Why wasn't the more current model used in the DEIR?
2. Existing ambient noise data was only gathered on a Wednesday at 3 sites in close proximity to the intersection of Ave L and 60th Street West, all other existing noise data was modeled.
 - a. Why couldn't the other road segments and intersections be monitored?
 - b. Data for weekend ambient noise levels was not gathered. Weekends in this residential neighborhood is extremely different than weekday noise with sounds generated by 3,200 students. Weekend noise levels will be the days most affect by the two super center projects with the delivery truck, trash trucks, armored vehicles noise and 24-7 customer traffic noise.
 - c. Ambient noise for the majority of the school day is much lower than the hours before school starts and lets out so the change in traffic noise generated by the 2 super centers will be more significant for the majority of the day.
3. The DEIRs state the model calculates the average vehicle noise based on traffic volumes. The peak traffic counts are not representative of actual conditions since traffic data for the 'AM peak' hour captures only the last half hour of school traffic. The PM peak hour does not capture school traffic at all; it was taken an hour or more after school lets out (junior high school lets out earlier than the high school). Unrepresentative data used as input to a model results in unrepresentative output of existing or future noise levels.
 - a. Traffic data differs between data used to calculate traffic peaks and current air quality with traffic peaks having lower counts then data used to model current air quality. Which traffic data was used for input to the noise model?
 - b. The difference in traffic at many of the intersections between supposed existing weekday noise and weekend noise devoid of school traffic barely differs. For example Ave L-4 and 60th is a two head dead end segment used by many students to get to/from school and avoid traffic bottlenecks. It is only used on the weekends by residents whose streets directly connect to the dead end segment. The traffic from students on a school day is 3 times more than on weekends, however noise is modeled so that weekday noise differs from weekend noise by only 2 dBA (53.6 and 51.6).

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4. Vehicular operational noise was modeled to predict future noise levels for roadways and compared with predications of noise generated by the projects.
 - a. Why do the future predictions for noise on 60th Street south of Ave L-4 increase by 5.1 dBa? The majority of the land is already developed as homes so why would future predictions of noise be so high? The only reason future traffic noise would increase would be to get the super center projects, but this number is suppose to reflect noise with out the projects.
 - b. By inflating the future predications values it is no surprise that in comparison when predicted increase in noise generated by the projects, they show less than the significant 1.3 increase.

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The final EIR should eliminate delivers after 9:00 at night or before 9:00 on weekends so residents can sleep.

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Population, Housing & Employment Forecasts

1. Table IV shows 2004 SCAG forecasts for population, this is the same group who noted in the 2007 Economic Report of Lancaster that the AV area had a large percentage (> 10%) of workers in the construction sector so a downturn in the housing market would have an adverse effect on the job market in the area. They predicted no housing problem in the future. Just how accurate is this population predication.
2. Both projects have identical estimates for the number of construction workers, 865. How can this be when the project sizes, building layouts, and types of retail stores are different for each project?
 - a. Both DEIRs claim construction workers travel from job to job, seldom relocating to the job site and the construction jobs generated for the projects may be filled by long distance commuters rather than local workers. The commuters will increase air pollution.
 - b. These jobs are temporary, only lasting for the duration of the construction; therefore, the number of construction job these projects create would have a less than a significant benefit to the local community job market.
3. The Southern California Association of Governments (SCAG) 2007 Economic Report of the City of Lancaster found a majority (56 %) of Lancaster households has an annual household income of less than \$50,000 and half of those are below \$25,000.
 - a. The Commons project estimates a net increase of approximately 927 new jobs and the Lane Ranch project estimates 828 new jobs. These can not be full time jobs based on the number of shops and eating establishments both projects will build.
 - b. Both projects claim some employees will be management level implying high salary positions but both admit the majority of jobs are in the retail, restaurant and fast food sectors which are the lowest paying jobs available. What is the net worth of these low paying jobs to the community?
 - c. The salaries generated by the majority of lowing paying jobs is too low for employees to afford a home in the local neighborhood without receiving state/government assistance or having to work a second job. Employees will have to commute from lower income neighborhoods. This contradicts the statement that the projects would reduce air pollution because employees will come from the local neighborhood and not be commuting.

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Public Services

Fire

Admitted in the summary for both projects is the requirement for increased manpower, equipment, and facilities to accommodate the increased demand for fire services. The mitigation method is payment of

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developer fees. Payment of the fee does not guarantee the availability of the service during the construction or operational phases.

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Police

1. The Commons project summary identifies a substantial increase in the demand for police services when the vacant site is developed into a commercial center but does not give any mitigation measures. Lancaster city for a number of years has implemented a contract with the stores located at the super center shopping center at Ave J and 20th Street East. This contract has the stores paying the salary for 40 hours a week policing at their shopping center. A similar contract needs to be implemented for the increase crime rates a commercial center will bring to the neighborhood.
2. The Lane Ranch project summary does not believe there will be an increase in policing services when the ranch is converted to a super center. How can this be? The ranch currently located on the property does not offer a monetary incentive for criminal activity but turning the ranch into a commercial center with multiple stores, fast food and restaurants will increase criminal opportunities. Crime follows the money. Even shop lifting and vandalism will increase from its current non existence level.
3. Mitigation measures to reduce crime are fencing during the construction phase and lighting and building security systems for the operational stores. There is no increase for policing the area once the projects become operational.
4. There are no mitigation measures identified in the draft EIR to protect the local residents from spill over crime such as vehicle theft, home invasion, burglaries or crimes against persons. This is the crime residents are most interested in, not in protecting the commercial structures and their contents.
5. There are no mitigation measures to protect students from spill over crime such as vehicle theft or crimes against persons. At the very least an additional sheriff paid for by the commercial centers should be patrolling the school perimeter and parking lots an hour before school, during school hours, an hour after school and during school events held outside normal school hours.
6. Both DEIRs claim there is no unique law enforcement issue specific to the proposed project. That is incorrect, the corner of Ave L and 60th Street West is under Lancaster jurisdiction, adjacent to the Lane Ranch project and on the other side of the high school are unincorporated Los Angeles areas which are under California Highway Patrol jurisdiction. Just a mile down 60th Street West it becomes Palmdale's responsibility. What law enforcement agency will service crime crossing these jurisdiction borders? When a call for assistance is made, will every agency say it's not their responsibility? This issue is not addressed even thou the requested for its inclusion in the draft EIR can be found in the public comments appendix.

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A comparison with an existing discount super center's crime rate to a residential neighborhood located miles from a commercial center needs to be included in the final EIR, that way the actual increase in crime to the neighborhood can be estimated more accurately. An even better comparison would be the crime rate of a neighborhood before a discount super center was built and the rate after the commercial center was built. Lancaster city should be able to provide this data from any one of their already existing super centers.

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Transportation and Traffic

1. Traffic data gathered for use in the DEIR was collected using manual methods instead of an automated device.
2. National Data & Surveying Services, the company used to collect the traffic data doesn't even have a web site so it is no surprise they don't own a automated counting device. Many be they should have borrowed one from the city or county.
3. Instead of collecting 24 hours of data to determine peak hours, data was only collected for 4 hours on 5 days.

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- a. The days in which the data was collected were on 2 days the week of Memorial which also happened to be minimum school days.
 - b. There was only one weekend collection day, Saturday, the day after school was over for the year when many residents leave with their school children for vacation.
 - c. The other two collection days were the 1st and 2nd weeks after school starts in August.
 - d. The hours were also carefully chosen to not cover the actual heavy traffic hours and then 1 hour of the day was thrown away to represent a 'peak hour' of traffic.
- 90-68
4. Peak traffic data is not representative of actual traffic. The supposed 'AM peak' hour captures only the last half hour of school traffic. The PM peak hour does not capture school traffic at all; it was taken an hour or more after school let out (junior high school lets out earlier than the high school).
- 90-69
5. The PM traffic captures little if any commuter traffic since it was taken between 4:00 PM and 6:00 PM with a supposed peak time of 5:00. This is a neighborhood of commuters, most get off work at 5:00 and typical commute time is at least an hour.
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6. The majority of differences between AM peak with the tail end of school traffic and PM peak with no school traffic about 50 vehicles. Did students fly over the intersection on their way to school or did they all cram into the few additional cars?
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7. An independent manual count taken in February 2009 at the corner of 60th Street west and Ave L came up with hundreds of more cars going in a single direction than is identified in the DEIRs.
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8. The suggestion to mitigate traffic by increasing the number of traffic signals from the current 3 on 60th between Ave J and Ave M by an additional 6 will increase delays for residents just trying to get in and out of their homes. The 4 mile gantlet of 9 traffic signals needs to be synchronized to prevent idling traffic and to allow residents to complete the distance without having to stop and wait a wait every few 10ths of a mile just to get to or from their home.
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9. Deliveries should be prohibited for one hour before school starts or ends and one half hour after school starts and ends to allow school traffic to disperse.
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10. Delivery trucks should be prohibited from using side streets. Enforce this by fining both the store and the delivery truck an increasing amount every time they violate it. The fine starts at the amount charged for running a red light and increases by \$1,000 for each subsequent violation. The funds collected will go toward street maintenance of the road – LA County for streets in unincorporated jurisdiction, Lancaster or Palmdale for streets maintained by either city. This is fair since a 40 ton truck causes as much road damage as 6,400 vehicles. Violations can be documented by residents with a photo and or written account denoting location, time and truck identification.
- 90-75
- a. Delivery trucks using side streets it will make it unbearable for residents of the side streets and the neighborhood residents traveling out or into the neighborhood.
 - b. Many residents will be forced to resort to side streets to avoid traffic signals and traffic; in particular L-8 will become the main egress in and out of the neighborhood.
11. The DEIRs' report that the added traffic volume generated by the project will significantly impact traffic flow at 15 of the intersections. The analysis states that future operating conditions would be degraded without road widening and that an increase from one to three lanes reduces the impacts to a level of insignificant.
- 90-76
- a. They also note that most areas have one lane in each direction currently and the ultimate street widths will provide 3 lanes in direction.
 - b. So why are the suggested improvements only adding an additional lane and not the ultimate 3 in directions that would reduce the traffic impact to insignificant levels?
 - c. The suggestion to mitigate traffic by increasing the number of lanes should be for both directions since shoppers will have to travel in the reverse direction when leaving the commercial super centers. Some suggestions are for an increase only in the directions toward the commercial super centers.

12. What is a 'fair share' of road improvement costs? Fair is not a definitive number. Is the share based on the number of proposed projects to be built? Does it assume all projects will be built? When would the roads be improved, after all proposed projects complete? If one or more of the projects is not built than what happens to the fair share, will there now be limited funds to widen the road? The road improvements need to be complete before construction starts on the 1st project that way it would insure the collection of 'fair share' funds are really spent to mitigate the road degradation the proposed change to commercial zoning would cause to this residential/rural neighborhood.
13. As the Traffic analysis states until these improvements are implemented there will be significant unavoidable impacts to the 15 intersections. The road widening needs to happen before construction begins for the commercial super-centers to not adversely effect the commute times of residents and students during construction and to ensure the improvements are finished before the stores are opened.

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Utilities & Electricity Appendix

Emissions of greenhouse gas consumption lists 5 single residential units @ 6,665 cubic ft/unit/month, therefore on average for a single unit $6,665/5 = 1,333$. Multi-family residential does not list number of units but has 4,011 cubic ft/unit/month, more than single residential unit. Industrial gives usage by parcel as 241,611, much more than residential. Retail/shopping has square foot in parentheses and gives a value of 2.9, so a retail store of 5,000 square feet (the smallest size store for this proposed shopping center) would use $5,000 \times 2.9 = 14,500$ or much, much more than a residential unit. Where is the usage for a restaurant, fast food store or grocery store?

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Emissions of greenhouse gas from electricity demand lists a 5 single residential units @ 5,626.5 KWH/unit/year, therefore on average for a single unit $5,626.5/5 = 1,125.5$. Now restaurant and food store are considered and once again have square foot in parentheses and gives a value of 47.45 for a restaurant and 53.3 for food store. Using 5,000 square foot for a restaurant (10,300 sq ft identified as the size for a restaurant and fast food) gives $5,000 \times 47.45$ for 237,250 KWh demand, again much, much more than a residential unit. The food store gives a value of $53.3 \times 88,695$ (1/2 of the Super Target size, reduced because not all space is for groceries) = 4,727,443.5, once again much, much, much more electricity demand than a residential house.

90-80

Emissions of greenhouse gas from vehicles scenario is everyone drives 100 miles a day every day of the year. Not in the real world. Assumed mpg is also not real with an assumption of 27.5 for an auto or 21.4 for a light truck.

In the **summary of significant unavoidable operational impacts** for the Commons project, air quality will exceed the thresholds set by AVAQMD thus resulting in a significant and unavoidable impact. Why do the students and residents in the area have to suffer the health risks brought by these projects? Most home owners bought in the neighborhood to escape urban problems and insure their children attended the best schools in the Antelope Valley. Now they and the students will suffer. The potential for convenient discount retail and fast food shopping exceeding the demand by 145% is far out weighed by the air quality damage residents and students will be stuck with.

90-81

According to the DEIR, the **Southern California Association of Governments (SCAG)** is not an air quality management agency but it is responsible for developing transportation, land use and energy conservation measures that affect air quality. It provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies.

90-82

1. The Southern California Association of Governments (SCAG) 2007 Economic Report of the City of Lancaster found a majority (56 %) of Lancaster households has an annual household income of less than \$50,000 and half of those are below \$25,000.



2. The report identified the largest numbers of workers are found in the lowest paying jobs of retail sales and food services.
3. The report identified a larger than normal (>10%) number of jobs were in the construction sector. is suffering the most with the housing crash and recession/depression.

Shopping centers near a freeway may draw in out-of-area customers but a store far from a freeway has only the residents from the local neighborhood to draw from. The potential customer base in this neighborhood is limited to begin with and they can only buy so many school supplies, groceries, garden and home improvement products.

Economic, Fiscal & Urban Decay Appendix

1. None of the 67 retail stores in historical Quartz Hill business district were included in the analysis for urban decay. The Quartz Hill business districts is located 1 mile away and will suffer more urban decay than the Lancaster stores, located further away that were included in the urban decay analysis.
2. Saturating the AV by adding two more super centers eats into the sales of the four existing super centers. Cannibalizing same store sales can close existing stores leaving abandoned monolithic sized buildings. The Avenue L and 60th Street West location cannot economically support one super center let alone two.
3. The city will not benefit with the addition of these super centers as shoppers transfer their patronization from one Lancaster store to another the sales tax money the city collects will remain the same! But the costs associated with the super centers in policing services, road repair and other infrastructure maintenance will only drain Lancaster's already limited funds.
4. Retail stores competing against super centers are closing in record numbers leaving fewer shopping alternatives for everyone. Last year 4,500 retail stores closed and analysts predict as many as 7,000 additional retail stores could close this year as consumers cut spending and retailers struggle to finance their inventories.
5. This neighborhood is overstocked with unsold and foreclosed homes that won't be legally occupied any time soon. When people face foreclosure or other financial problems they do not spend their limited funds maintaining their homes and yards. The customer base is further reduced because abandoned or unoccupied homes do not house customers.
6. The economic analysis claims direct impacts occur primarily in the City of Lancaster. The projects site is on the boarder of Los Angeles County's unincorporated Quartz Hill community and is located 1 mile from the boarder of Palmdale, both of these communities will receive a direct economical impact if these projects are built.
7. The attached economic document is incomplete; it has numerous blank costs values and empty values in the tables.
8. The table listing the potential competitive shopping centers does not include the Quartz Hill business district located 1 mile from Ave L and 60th Street West. It does not include the 40th Street West and Ave L Vons shopping center two miles away nor does it include the 50th Street West (a.k.a. Rancho Vista Blvd) and Ave N Albertsons shopping center 3 miles away. Of the 9 shopping centers listed all but the non existent 60th Street West and Ave K center are located further away then the existing shopping centers in this area.
9. The economic document analyses the 2 competing super center projects for garden and home improvement merchandise but ignores the Quartz Hill garden shop, hardware and building materials stores located 1 mile away in the business district of Quartz Hill. It ignores the existing grocery stores, restaurants, fast food of the Quartz Hill business district and the Vons or Albertsons shopping centers. Why are the nearby existing stores ignored creating a false no impact conclusion to urban decay?
10. The only time a store in either the Vons shopping center or the Albertsons shopping center is included in the economic analysis is for the drug stores. Once again the drug store located closer

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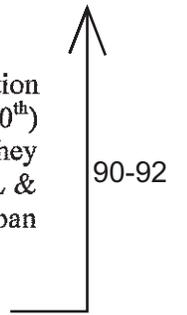
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90-92

on 50th Street West in the Quartz Hill business district is ignored. The conclusion is the creation of the super center projects on drug store patronage in the Vons shopping center (Ave L and 60th) and Albertson's shopping center (Rancho Vista Blvd & N) would not be impacted because they are on major roadways but the two drug stores located further away on the same streets (Ave L & 30th and Rancho Vista Blvd & 30th) with an increased number of lanes will be at risk for urban decline. How can this be?



Submitted by:

Edwin Valencia
42444 57th Street West
Lancaster, CA 93536



Dear Ms. Swain,

The Environmental Impact Report fails to take into account the reality of today's economic and environmental situation.

91-1

According to the EIR, the proposed site is expected to consume an additional 47,349 gallons of water per day. When you combine this with the water to be used by the proposed construction on the other side of 60th street, you're talking about a tremendous amount of water usage. Quartz Hill Water District, which will be supplying the water for both of these sites, has recently introduced a Water Budget for our entire area. Not only are our water rates being increased, but this new water budget will include major monetary penalties for going over the limit, which is already pretty low. According to the QHWD's own website "We can no longer ignore this drought. We must find the best way to meet the needs of everyone while creating a fair and equitable division of **the limited amount of water available.**" With the major loss of water flow from the Delta, due to environmental concerns, and the unknown effects of Global Warming, we have no idea how long this drought is going to last. How can the impact of this project's water usage be considered minimal, when our water supply is so limited that our water district has to implement what is essentially water rationing? How is it that new home construction can be put on hold due to a lack of water, yet this project which will use over 400 gallons per day more than a home would, is said to have a negligible impact on our water supply?

91-2

In addition to our lack of water, the United States is currently going through the worst recession in recent history, with California being hit especially hard. While the EIR states that the impact on urban decay will be minimal, it does not take into consideration the fact that businesses are already closing at an alarming rate. Businesses in the Quartz Hill area are being hit hard by the downturn in our economy. Building this shopping center will push many of these stores into bankruptcy. In addition, unoccupied retail space has increased dramatically in the Antelope Valley. A small strip mall, located off avenue L and 30th Street West, opened about a year ago. To date, there are still several vacant spaces. New home building has virtually ceased, thereby reducing the projected population increase by an unknown factor, not to mention all the home foreclosures in the area. With people shopping less, and the population increase being less than expected, urban decay may happen right in this new development. How many

91-3

other businesses have committed to taking up retail space at this new site? Have they reaffirmed this commitment in light of our current economic condition? Are these viable businesses, or will they shut down in a short period of time, thereby causing urban decay? How long will Target be able to compete with Walmart, which is planning it's own store right across the street? Target shares are down over 35% with most of their sales losses going to Walmart.

↑
91-3

One concern that was mentioned, but not directly addressed in the EIR is the loss of property values. Most homes in the Antelope Valley have already lost a considerable amount of value. Homes located directly behind the new development (on 57th Street) will suffer an even bigger decline in value due to the added traffic, noise and blight. Who wants to live directly behind a shopping center? The mere fact that this development is being considered has already had a negative effect on the value of homes on 57th street. Ironically, it is us who will be paying the balance of the cost for the required road construction, through taxes. Even worse, is the fact that if you go through all the letters in the EIR, you will see that **THE OVERWHELMING MAJORITY OF TAX PAYERS IN THE AREA DO NOT WANT A SHOPPING CENTER BUILT HERE!**

91-4

Most people, including myself and my family, moved to Quartz Hill for the small town atmosphere. Dressing up a mall with big box stores in friendly colors does not negate the fact that it's still a mall with big box stores. As our new president Obama would say, "If you put lipstick on a pig it's still a pig". This shopping center will destroy the small town feel of Quartz Hill.

91-5

Thank you for your time.

Edwin Valencia



Board of Supervisors County of Los Angeles

MICHAEL D. ANTONOVICH
SUPERVISOR

March 5, 2009



Mr. and Mrs. Michael & Cleo Goss
6111 Landau Place
Lancaster, CA 93536

Dear Mr. and Mrs. Goss:

Thank you for your letter and comments regarding the Draft EIRs for the proposed developments on Avenue L and 60th Street West in Lancaster at the border of Quartz Hill.

I have forwarded your letter and comments to Mayor R. Rex Parris at the City of Lancaster, for their review and inclusion in the EIR process. I'm sure you will be hearing from him shortly.

92-1

Again, thank you for writing and best regards.

Sincerely,

MICHAEL D. ANTONOVICH
Supervisor

MDA:nhm

✓ c: Mayor R. Rex Parris
City of Lancaster

Michael D. Antonovich
Supervisor, Fifth District
County of Los Angeles
869 Kenneth Han Hall of Administration
500 West Temple Stret
Los Angeles, CA 90012

Regarding the Draft EIRs for the proposed developments on Ave L and 60th Street West in Lancaster at the boarder of Quart Hill, attached are the comments I had regarding the proposed developments. I have many more concerns than I had time to include in this tight 45 day deadline.

We hope you can make sure these issues are address in the final EIRs.

Thank you,
Michael and Cleo Goss
611 Landau Place
Quartz Hill, CA
93536

92-2

The name Quartz Hill Commons is offensive. This may be a 'common', yet one more superstore strip mall but it is not on Quartz Hill property. Just like Lancaster objected to the city name being used on the sign for the LA County prison, Quartz Hill residents and businesses object to Quartz Hill name being associated with a Lancaster commercial site because patrons may be fooled into thinking this is Quartz Hill's business district.

92-3

Deficiencies

The school zone is not limited to only the school property. School zone warning signs and reduced speed limits are posted well beyond the school boundary. The schools nearby and across the street from the proposed commercial centers are a major environmental element in the neighborhood of Ave L and 60th Street West. Rezoning to commercial will have a major affect on the school environment and this should be addressed in the Environmental Impact Report.

92-4

1. Truancy is not addressed at all in the Draft Environmental Impact Report but it is a concern many specifically requested to be included. Truancy will be a problem for both Joe Walker Junior High School and Quartz Hill High School.

a. Truancy will cost parents time off from work to attend court and money to pay the truancy fines.

b. Truancy will decrease federal funding. On February 15th, 2009 the AVPress reported that student attendance is critical to the districts cash flow revenue. Schools are only paid when a child attends. Currently there is no fast food and commercial places for students to hang out within walking distance of the schools. Reducing attendance by a single percentage point reduces federal funding by \$1 million dollars.

92-5

c. The AM/PM on the corner of Ave L-8 and 60th is the only commercial store within walking distance from the schools. They will only allow a limited number of students in the store at a time and none with backpacks to prevent shop lifting and other problems?

92-6

d. Placing fast food across the street will increase childhood obesity. Students will stop at fast-food establishments on their way to and from school. Schools have worked hard to provide students with healthy snacks and lunches. Vending machines are no longer stocked with junk food. Who has the will power to eat healthy when the smell of greasy fried foods reminds you they are just a step away? Many figure conscious students will resort to a finger down the throat to correct their overeating. Students who are not allowed to leave campus for lunch will sneak off and not bother to return to school afterwards.

92-7

It doesn't take much to tempt some students away from school, placing 2 shopping centers directly across the street will be too much to resist. No other school in the Antelope Valley is surrounded by super sized commercial centers. Why has the Draft Environmental Impact Report failed to include truancy in its investigation? The Draft Environmental Impact Report needs to investigate all the affects of rezoning to commercial in a school zone will have on the students. The stores should provide funding for the additional truancy officers that will be needed to police the students.

92-8

2. The affects of building large commercial centers on the values of homes in the neighborhood is not addressed at all in the Draft Environmental Impact Reports but it is a concern many specifically requested to be included.

a. Many home owners purchased their homes in this rural/residential neighborhood to escape the urban city environment. These proposals will completely change the character of the neighborhood. Many home owners will wish to move to escape the encroachment of commercial into the neighborhood and the problems that will bring. Who would want to buy a home that faces the delivery area of a major shopping center?

92-9

b. With not one but two super center discount stores on the same corner, what will happen to the property value of homes? Homes in this area were consider by realtors and potential home

owners as the most desirable in the Antelope Valley and commanded higher prices than a similar home built on the eastside. If these commercial centers are built the neighborhood will no longer be desirable and property values will drop.

- c. The people who would like to live within walking distance of two discount super centers are not the people who can afford to live in the neighborhood.

Why has the Draft Environmental Impact Report failed to include the change in property values in its investigation? The impacts the commercial centers will have is not limited to those sites only. Quartz Hill properties adjoining the commercial centers and Palmdale properties a mile down the road will also be affected. The Environmental Impact Report needs to investigate the downward change in property values to the homes in the surrounding area and develop a strategy that will allow fleeing residents a monetary compensation for the reduced property values these centers will cause.

92-9

3. The affects of trash generated from the stores and fast food establishments is not addressed at all in the Draft Environmental Impact Reports but it is a concern many specifically requested to be included.

- a. There is no way to prevent the wind from blowing plastic bags, fast food packaging and other trash onto residential property or the surrounding land. How will this be mitigated? The commercial shopping centers need to provide weekly if not daily litter removal.
- b. Abandoned shopping carts will end up on residential property and streets. Residents already living near commercial centers recount the problem of shopping carts that block residential streets. How will this be mitigated? The commercial shopping centers need to police the residential areas for abandoned shopping carts and remove these eye sores and street hazards.

92-10

4. The Draft Environmental Impact Report did not bother to include the suggestion of turning the Lane Ranch property into a historical museum. This idea was publicized in the AVPress years ago and it was included in the public comments appendix of the report. The DIER introduction indicated alternatives would be evaluated under public services and did mention that a museum was suggested as a better use for project site but the museum alternative was never evaluated as an alternative in the DIER for Lane Ranch.

92-11

5. A park alternative was suggested for the Commons project and this suggestion was included in the public comments appendix. The Draft Environmental Impact Report mentioned the park alternative but dismissed without a proper evaluation, claiming it was infeasible because the city does not own the property. Doesn't the city know they can purchase the property from Wal-Mart? If the city does not rezone the land to commercial the property will remain residential and be worthless for a company that wants to build commercial. Wal-Mart would likely sell the property to the city to purchase more suitable property; property not across from a school, property near the freeway, property already zoned commercial and that already has multiple lane access. The business area near Ave G fits the bill. Wal-Mart may even resell the residential land at Ave L and 60th to the city at a discount rate since they are in the business of discounting.

92-12

6. The Draft Environmental Impact Report for the Commons project also dismisses moving the project to an alternative site as infeasible. The report claims the impacts of the project would remain the same. Moving the project so it is not across the street from the high school will definitely make a difference to its impact on both schools. Moving the project to an already commercially zoned area with multiple lane access will definitely make a difference to the cost of road improvements and maintenance as well as eliminate the impact to residential neighborhood of Ave L and 60th Street West. The Final Environmental Impact Reports need to give serious consideration to the public's suggestions and not just claim it is infeasible to avoid inclusion in the Final Environmental Impact Reports.

92-13

Inadequacies

Summary for Aesthetics

1. The visual mix between residential and commercial land uses impacts the 'small town feel' of the neighborhood. It will be an abrupt change between the unincorporated Los Angeles County Urban 1 designation of single family semi rural homes in the unincorporated area to a mega discount super strip mall type urban commercial center. The compatibility between the adjoining Lancaster City and Los Angeles County land use and the difference in development standards needs to be addressed. Many residents moved to the area to escape the noisy, traffic and crime congested urban centers. These projects will forever change the local neighborhood and desirability of living in the Westside Quartz Hill area.
2. The DEIR does not mention electronic billboards. Will the use of electronic billboards be prohibited?
3. The one and only existing commercial store on 60 Street West an AM/PM located on 60th and L-8. When this store was built, the height of the sign allowed at that time was just off the ground. Lancaster's standard of no taller than the roof of the building, meaning into resident's homes and seeable for miles away creating a nuisance for not just the residents adjacent too the projects but for every residential within miles.

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92-15

Environmental overview provides a table of 82 foreseeable future projects. The 82 future projects in conjunction with the 2 projects on the corner of Ave L and 60th Street West could produce a cumulative impact on the area. The majority of the 82 projects are located in Lancaster. Most of the future projects are 3 miles away from the site. There is 1 park and 2 schools with 76 housing projects. When is it envisioned that the 76 housings projects will be complete? In the current over stocked housing market will they ever be built? Only 3 projects of the listed 82 projects are identified as retail, the two Ave L & 60th projects and another project in Quartz Hill. In the current economic recession/depression how many of the retail shops in these projects will be filled? Will these shopping centers be just another strip of vacant shops anchored by two competing super discount stores?

92-16

Summary for Air Quality claims building these super centers will reduce emissions by providing retail service to the local community. The local community already has shopping for everything these super center will provide. Quartz Hill business district located 1 mile from the site already provides:

2 restaurants	3 fast-food
3 cafes	2 pizza shops
5 beauty salons	1 barber shop
2 antiq�e stores	1 boutique
1 drug store	1 dairy
1 garden shop	1 feed store
2 auto repair stores	2 body shops
4 tire stores	2 gas stations
1 auto-parts store	1 hardware & lumber store
5 convenience stores	3 veterinary clinics/ hospitals
1 bank	1 equipment rental store

Total of 67 stores

92-17

Including many little shops: karate, dance studio, skate board store, florist, laundry mat, urgent care, dental, post office, etc

The Albertsons shopping center (3 miles away on Ave N & 60th) offers:

- | | |
|-----------------|-----------------------|
| 1 grocery store | 1 drug store |
| 1 bank | 4 fast-food & 1 caf e |

Many little shops: nail & tanning salon, dry cleaners, video rental, boutique etc.

The Albertson's shopping center located 3 miles from this site and the

Vons shopping center located (2 miles away on Ave L& 40th) offers:

- | | |
|-----------------|--------------------|
| 1 grocery store | 1 auto-parts store |
|-----------------|--------------------|

- 2 banks
- 1 pet store
- 1 restaurant
- 1 drug store
- 1 electronics store
- 2 fast-food & 1 pizza

Many little shops: donut, ice cream, dry cleaners, video rental, hair & nail salon, pool supply, tanning salon etc.

These super centers will off nothing new to the local community. Most of the local residents live closer to the three existing shopping centers than they do to this site so driving further to reach this site will increase emissions not reduce them.

92-17

Summary for Construction impacts. The last projects developed in this neighborhood, housing tracts, caused significant damaged to resident's vehicles who were trying to enter or leave their property. In my household alone we had 3 flat tries from nails and a bolt. Many other residents as far away as a mile also had flat tries due to nails and one from sheet metal debris. The projects should establish a fund to replace or repair resident's tires that are flatten by construction debris

92-18

Summary for Odors. Odors from the fast food and restaurants associated with the projects is **not** consistent with odors from existing residents and restaurants in the area.

1. There are **no** restaurants or fast food in the area. The closest fast-food and restaurants are over a mile away.
 2. No residential cooking produces the quantities of smells that a fast food or restaurant does.
 3. No resident cooks 24-7.
 4. Very few if any resident fry and grill food on a regular basis. These odors are most offensive.
 5. Instead of scraping food off their grill, many fast food establishments burn it off creating both odor and air pollution.
 6. Many if not all fast food establishments will reuse their grease from the day before. Even if they change the grease on a daily basis they are still reusing the grease with every fish or French fry order.
- Any odors coming from these projects would have a significant impact to residents within a mile of the projects, increasing the odors by 100%.

92-19

Summary for Erosion and Topsoil. Since the projects are projected to take at least 1 year for construction they will experience periods of rain. It does not have to rain heavily in the area for flooding and erosion to occur. All the water from the surrounding roads runs through the sites on the way to the lowest laying ground. Every time a storm catch basin is emptied it floods the area. What exactly is the migration methods envisioned? How will it be policed, especially if the catch basin release comes from a Los Angeles or Palmdale storm basin?

92-20

Appendix Aesthetics.

1. Both the Lane Ranch and Commons project's plans include tall towers, 42 feet and 41.6 feet in height. Neither Quartz Hill High School nor Joe Walker junior high school consists of two story buildings. There are no residential homes in the area that are 41 or 42 feet high. The proposed landscaping will not screen these structures from view. This creates a substantial change in the visual character of the neighborhood from its current rural ranch setting.
2. The statement that the 'General Plan' envisions the transformation of the current rural condition to urban uses only applies to Lancaster property, not to Los Angeles' plan for unincorporated Quartz Hill which directly borders these projects. Palmdale is only a mile away and has a different general plan for its land use.
3. The statement that the project area is already urbanized with a mixture of institutional, commercial and residential uses contradicts the statement above about transforming the current rural use to urban. 60 Street is currently not urban. There is one and only one existing commercial store on 60 Street West, the AM/PM located on 60th and L-8. Except for the one AM/PM store 60 Street starting from the city of Rosamond, through Lancaster, unincorporated Quartz Hill, and the city of Palmdale,

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ending at Lake Elizabeth Road in Leona Valley is consistently a rural, residential road. There are ranches, farms, open desert, houses, and a vineyard. These projects do not fit in with the current land uses. The building of these projects will forever change the style and ambiance of the neighborhood community.

92-23

4. Urban decay focuses on whether the retail and dining planned exceeds the likely anticipated demand due to population growth and per capita personal income. In the current over stocked housing market will the 76 foreseeable future housing projects ever be built? If the housing projects never happen or only occur in the distant future than the anticipated population growth will not happen or will be drastically reduced. In these troubled economic times there is little incentive for residents with upside down home mortgages to spend their limited funds on gardening and other home improvements. Increasing foreclosures in the area reduce the number of residents and increase the number of residents on state or federal housing assistance thus reducing the overall incomes of area residents. With increasing job losses and tighten job market, residents will reduce their over all spending and eliminate non essential spending such as eating out. In the current economic recession/depression how many of the retail shops in these projects will be filled? How many will be able to remain open? The DEIR concludes with these projects the retail and dining demand will be increased to 145 %. It further prophesizes this excess supply would likely be a short-term phenomenon. Even President Obama believes we have not reached the bottom of our current economic troubles and economic forecasters predict years before a recovery. All the above mention issues creates a perfect storm for urban decay as competing stores fight to obtain shoppers and survive the economic conditions. At the time the DEIRs were developed the current economic crisis had not happen and any anticipated demand due to population growth and per capita personal income is no longer accurate.

92-24

Air Quality Appendix

1. Emissions for predicted pollutants in the proposed project vicinity used a dispersion model for predicting concentrations from a 1996 Bay Area Air Quality Management District instead of using a methodology from the local Air Quality Management District? Is this an apple to oranges comparison, a beach environment instead of desert environment with different inversion layers, prevailing winds, and regional pollution patterns, outside sources of additional pollutants, peak pollution seasons and daily times? Isn't there a newer methodology than one that is 13 years old?
2. Emissions were modeled based on rates given in the traffic study. The traffic study rates are not representative of peak hours and the numbers differ based on the item be accessed, where current air quality and current noise modeling have higher counts than the numbers given in the traffic study.
 - a. The results for operational activates is shown in table IV. D-8 of both DEIRs and shows that the thresholds set by AVAQMD would be exceeded thus resulting in a significant impact to air quality.
 - b. Assumptions were then made that vehicles would travel a maximum of 0.1 miles within the project site. This is a false assumption since the number of patrons needed to keep the two projects' numerousness stores open can not be found within a 0.1 mile radius and the economic evaluation identifies drawing in customers from as far away as Leona Valley.
 - c. Table IV. D-9 for both DEIRs differs in emission values with the Lane Ranch project showing lower levels of CO and NOx operational levels than the Commons project even though the Lane Ranch project is larger with 394,575 square feet verses 344,550 square feet for the Commons. In this table the Lane Ranch project modeled localized emissions to a level that would not create a significant impact to air quality. The Commons project found a significant impact in operational air quality. Why does the Lane Ranch not have the same significant unavoidable impact when it is across the street from form the Commons project? Does the air quality magically change depending on the side of the street you are standing on?
3. The monitoring station at Division is miles away from the actual site where the emissions come in direct contact with exercising students and residents. The air off the Division is located in an urban

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area and is likely more polluted than the current air at 60th Street West and Ave. L Ranch property and Commons vacant lot.

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4. All estimates of current air quality for the surrounding intersections were modeled rather than sampled. As identified above the models are out dated and not compatible with a desert environment. The varying traffic peaks were used to model future emissions. If the input data to a model is questionable then the output from the model is also questionable. Garbage in garbage out.

92-28

5. Every store, bank, restaurant, and the majority of fast food stores use armored vehicles to pick up their money and all armored vehicles idle while picking up money. Armored vehicles were not addressed in either DEIR and based the number of stores, shops, banks and restaurants associated with these projects operationally there will be a large number of idling armored vehicles. Competing businesses do not armor vehicle or truck pool.

92-29

6. Green house gas emissions to the generation of diesel fuel for the numerous diesel delivery trucks and armored vehicles to global warming were not assessed.

a. Diesel performance may mean better fuel economy and less carbon dioxide but it takes about 25% more oil to make a gallon of diesel fuel than a gallon of gasoline, so fuel efficiency needs to be taken in terms of "oil equivalents" and adjust the mileage claims for diesel vehicles downward by about 20% when comparing them to gasoline-powered vehicles.

92-30

b. US Department of Energy modeling has shown the greenhouse gas affects of diesel is more oil and carbon-intensive than reformulated gasoline. Making a gallon of diesel fuel requires 25% more oil and emits 17% more heat-trapping greenhouse gases than gasoline reformulated gasoline. Similarly, diesel requires 17% more oil and emits 18% more heat-trapping gases than gasoline reformulated with ethanol. This means that diesel fuel's advantages from its higher per-gallon energy content and better performance on greenhouse gases are at least partially offset by the impact of diesel's fuel-production process.

The final EIR needs to compare the current air quality at the school sites to data gather from existing stores of comparable size to see what the true increase in pollution will be. The data gathered from the school and the data from existing stores need to cover more than a few hours in the day since these stores will be open 24-7. A model that estimates air pollution based on estimated traffic is only as good as the input data and that is not representative.

92-31

Air Quality Data inserted on page 642 for the Commons project and page 657 for the Lane Ranch project.

1. Air Quality data claims more traffic than is found in the Traffic data. How can this be, is there another traffic count and if so why isn't it used to for the Traffic analysis? For example the difference at the Ave L and 60th intersection is:

8/28/07 Traffic data	Air Quality data	6/2/07 Traffic data for Saturday	Air Quality data for Saturday
northbound			
NL NT NR	NL NT NR	NL NT NR	NL NT NR
22 278 113	22 284 115	17 191 105	17 195 107
southbound			
SL ST SR	SL ST SR	SL ST SR	SL ST SR
83 375 18	85 383 18	66 229 12	67 234 12
eastbound			
EL ET ER	EL ET ER	EL ET ER	EL ET ER
35 288 14	36 294 14	24 121 10	24 123 10
westbound			
WL WT WR	WL WT WR	WL WT WR	WL WT WR
108 198 76	110 202 78	128 168 116	131 171 118

92-32

Note there was only one traffic collect on Saturday so traffic counts used in Traffic analysis should be identical to the traffic counts in Air Quality analysis.

2. Peak traffic data is not representative of actual traffic. The supposed 'AM peak' hour captures only the last half hour of school traffic. The PM peak hour does not capture school traffic at all; it was taken an hour or more after school let out (junior high school lets out earlier than the high school). For example the difference in exiting traffic according to Air Quality data between AM and PM traffic on Ave L and 60th shows:

northbound AM	PM	Difference between AM&PM peak
NL NT NR	NL NT NR	NL NT NR
22 284 115	65 225 136	43 59 21
southbound AM		
SL ST SR	SL ST SR	SL ST SR
85 383 18	109 253 28	24 130 10
eastbound		
EL ET ER	EL ET ER	EL ET ER
36 294 14	75 81 50	39 213 36
westbound		
WL WT WR	WL WT WR	WL WT WR
110 202 78	150 182 85	40 20 7

So the majority of differences between AM & the tail end of school traffic and PM with no school traffic is 53.5. Did students fly over the intersection on their way to school or did the 3,200 cram into 53 additional cars?

4. What's with the average speed estimates? Everything says current speed is 20 mph when the posted speed limits are either 45 mph or 55 mph. 92-34
5. How come future estimates have a 5 mph estimate? Is this because the traffic is going to be so bad, that it only moves 20 mph or is this to reduce estimated emissions? 92-35
6. How come PM average speed is the same 20 mph as the AM speed when PM traffic did not capture school commuters. 92-36
7. Travel Conditions are not reflective of the area, most residents travel more than 12.7 miles to work, many travel 30 - 60 miles or more. The 12.7 estimate must be for inner city dwellers. Travel speeds listed appear to also be suited for inner city rates with an average 30 mph, instead of the 55 mph speed posted on most rural roads and 65 - 70 freeway speeds. 92-37
8. Where did the operational emission estimates for store types come from? The emissions from the stores doesn't state the size of the establishments used in the comparison, are they the same size buildings as the proposed buildings? Where are the emissions for the restaurants and fast food establishments? 92-38
9. Under Operational Settings - Summary of Land Uses lists store unit types as all being 1,000 sq ft. not the sizes of the proposed stores ranging from 177,390 sq ft. - 5,000 sq ft. Once again comparing oranges to grapefruit, it may be a citrus but size makes a difference so the numbers given for total trips are not valid. 92-39
10. What is the Receptor Pathway data and colored pictures depicting, it is not explained. All options are not in use (data particles, seasonally emission rate, monthly emission rate, wind speed, etc.) and sources are not specified (points, volume, area, etc.). It looks like filler data to increase page counts. 92-40
11. What is the Meteorological Station data? Why use 1981 data from 28 years ago. Again sources are not specified (points, volume, area, etc.). 92-41

Health Risk Assessment inserted on page 784 for the Commons project and on page 801 for the Lane Ranch project. All the following references to pages numbers is for the Health Risk Assessment.

1. Page 4 states since there is no acute toxicity factor for diesel exhaust, they do not evaluate the acute short term non-cancer health effects. It ignores the affects of diesel soot and air pollution from increase traffic. 92-42

- a. In 1998 California Air Resources Board identified diesel particulate matter as a toxic air contaminant. Because of its potency and the large amount of diesel emissions in California, diesel is the number one contributor to adverse health effects of any toxic air contaminant know today. When it comes to smog-forming pollutants and toxic particulate matter, also known as soot, today's diesels are still a lot dirtier than the average gasoline car. Fine and ultra-fine soot particles (less than 2.5 microns) are the most successful at invading your body—they're small enough to travel deep into your lungs. Once there, these soot particles can irritate and mutate the most sensitive tissues in your lungs, your alveoli. These air sacs exchange oxygen and carbon dioxide from the air you breathe with blood in your capillaries, thus allowing your circulatory system to carry oxygen to the rest of your body. Soot particles, however, make this task more difficult because they cause inflammation and scarring of the alveoli. This also strains your heart because it must work harder to compensate for oxygen loss.
2. Page 4 notes that the non-cancer health impacts from inhalation exposure to diesel exhaust usually outweighs the multipathway cancer risk from the speciated compounds. The focus should be on the exercising students and residents directly exposed to the diesel exhaust more than the cancer effects of exposure to diesel exhaust.
- a. Soot particles come directly from the tailpipe and contribute to unhealthy levels of particulate matter (PM) in the air. In addition, the gaseous tailpipe emissions of nitrogen oxides (NOx) and sulfur oxides (SOx) from diesel engines form additional particulates when they react with other atmospheric agents.
 - b. Soot tends to fall out of the atmosphere close to the source of the pollution. The further you are away from diesel exhaust sources, the better for your health. Using data from a monitoring station six miles away does not give a valid reading of soot exposure to students and residents who live and attend classes close to the pollution source.
 - c. Soot causes chronic bronchitis and asthma. These conditions occur when the linings of your lung's bronchioles (air passageways) become irritated and swollen, in turn causing your lungs to create mucus to soothe the irritation. These conditions prevent your bronchioles from moving oxygen to the rest of your body. Symptoms can range from coughing and shortness of breath to severe and fatal attacks of oxygen loss.
 - d. Soot particles reduce the respiratory system's ability to fight infections and remove other foreign particles.
 - e. Individuals with preexisting respiratory conditions, children, and the elderly are the most vulnerable to soot's lasting and deadly effects. People with heart disease, emphysema, asthma, and chronic bronchitis suffer from increased hospital admissions and emergency room visits as a result of exposure to soot. Children suffer disproportionately from asthma and other respiratory conditions, about one in thirteen children have asthma. Asthma is the most common chronic disease of childhood and a leading cause of disability among children. The office of Environmental Health Hazard Assessment in 2001 sampling thousands of students who attend schools along busy roadways found a 5-10% increase in asthma and bronchitis. Air pollution effects on asthma and bronchitis are identified in the Heath Risk Assessment but no mitigation measures were given.
 - f. Children—and their developing lungs—suffer more acutely from breathing in diesel soot. Children are outdoors more often and breathing in more air per body weight than adults do. Children breathe at a rate of 20 breaths per minute and infants 20-40 breaths per minute.
 - g. The American Lung Association warns against exercising near high-traffic areas and 2003 CA law prohibits construction of public schools within 500 feet of busy roadways. All students must participate in physical education and many of the sports programs practice/play outdoors. Athletes breath rate peaks at 60 -70 breaths per minute.
 - h. The average respiratory rate of a healthy adult at rest is 12 breaths per minute and 35-45 breaths per minute when exercising strenuously.

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3. Page 3 of the Commons project anticipates only the Wal-Mart Supercenter and the 2nd major anchor will receive deliveries via diesel-fueled heavy duty trucks. It anticipates 5 trucks per day for the Wal-Mart Supercenter
- a. Where did the 5 trucks per day estimate come from? Is it the actual number of trucks that an existing super center of compatible size requires?
 - b. The 2nd anchor store estimated 3 deliveries per day. Where did this number come from? The project should already have a 2nd major anchor signed up by now and can use the actual number of trucks required to service a store of compatible type and size.
4. Page 10 of the Lane Ranch project anticipates the Home Depot and Major 1 store will together receive 18 trucks per day. It further states that that no Transport Refrigeration Units were used in the modeling.
- a. Page 3 identifies Home Depot as one of the 2 major stores but does not identify Super Target as the other major store. Why is the identification of the second major store is not disclosed in the health risk Assessment when it is identified else where in the DEIR?
 - b. A Target Supercenter will require Transport Refrigeration Units to bring in the frozen foods, fresh produce, meat, and dairy on a daily bases.
5. In both DEIRs emissions were modeled, why couldn't they take actual readings at existing stores of compatible type and size?
- a. Only the deliveries for the 2 major anchor stores were used in the model, none of the many other shops, restaurants, or fast food deliveries were included. The total number of diesel-fueled heavy duty trucks delivering on a daily basis for just those 4 stores is 26!
 - b. Estimate exposure was calculated based on respiration rates and the modeled emissions. What value was used as a respiration rate? The rate of an adult at rest, the rate of a child or infant, the rate of an asthma suffer, the rate of an adult exercising or the rate of an athlete? It looks like the only person evaluated was an adult at rest.
6. Both projects do not include the Transport Refrigeration Units (TRU) of the restaurants and fast food stores that will be required on a daily bases to deliver the frozen foods, fresh produce, meat, and dairy products used by the restaurants and fast food stores.
- a. Estimates should be gathered from existing stores, fast-food and restaurants of the same size and type. Each commercial chain should have already in existence at least one store of the same size since most use a cookie cutter type building plan for their stores.
 - b. Transport Refrigeration Unit ATCM adopted in February 2004 increase standards for TRUs requiring TRUs older than 7 years to be rebuilt to meet the more stringent emission standards. How old are the TRUs used by the fast-food and restaurant chains? How old are the TRUs of the super centers?

The final EIRs need to include the actual number of diesel delivery trucks and TRUs required to supply the Super Target. It needs to include the number of TRUs required to service all the restaurants and fast food stores of within both projects. It needs to include the affects of soot and increased air pollution due to an increase in traffic at the projects' site where proximity to the source is a critical health factor. It needs to include different breathing rates of exercising adults & children in the calculations of health risks and soot.

Asphalt parking lots and stores are a source of heat – absorbing the sun all day and radiating it out after sunset. If night time temperatures remain high the following day begins hotter and this cycle continues; creating an island of heat. Residents in the surrounding area, as well as, the stores in the complexes will have to use more power to overcome this heat source.

92-49

Land Use Planning Appendix – Many residents expressed concerns about a decrease in their property value if these commercial centers are developed, especially the residents whose homes will face the delivery end of the centers. The introductory identified land use was the location where this concern would be addressed, it was not. A search of the DEIR for property value found this concern was not addressed at all. Through no fault of their own, home owners will have to suffer a decrease in their home values without any compensation what so ever from the creators of this monitory disaster and degrading quality of life issue, trash, traffic, noise and light pollution.

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Noise Appendix

1. The traffic noise model used, FHWA-RD-108, to predict noise for road segments and intersections is over 20 years old.
 - a. The vehicle noise emissions database was collected in the mid 1970s.
 - b. The vehicle database contains no data for vehicles subject to interrupted flow conditions, unlike the conditions the roads and intersections that were modeled in the DEIRs. These roads will be subject to stop and go traffic and multiple signal light stops as well as jay walking students.
 - c. A newer FHWA traffic noise model was released in 1998 and upgraded 7 times since release. Why wasn't the more current model used in the DEIR?
2. Existing ambient noise data was only gathered on a Wednesday at 3 sites in close proximity to the intersection of Ave L and 60th Street West, all other existing noise data was modeled.
 - a. Why couldn't the other road segments and intersections be monitored?
 - b. Data for weekend ambient noise levels was not gathered. Weekends in this residential neighborhood is extremely different than weekday noise with sounds generated by 3,200 students. Weekend noise levels will be the days most affect by the two super center projects with the delivery truck, trash trucks, armored vehicles noise and 24-7 customer traffic noise.
 - c. Ambient noise for the majority of the school day is much lower than the hours before school starts and lets out so the change in traffic noise generated by the 2 super centers will be more significant for the majority of the day.
3. The DEIRs state the model calculates the average vehicle noise based on traffic volumes. The peak traffic counts are not representative of actual conditions since traffic data for the 'AM peak' hour captures only the last half hour of school traffic. The PM peak hour does not capture school traffic at all; it was taken an hour or more after school lets out (junior high school lets out earlier than the high school). Unrepresentative data used as input to a model results in unrepresentative output of existing or future noise levels.
 - a. Traffic data differs between data used to calculate traffic peaks and current air quality with traffic peaks having lower counts then data used to model current air quality. Which traffic data was used for input to the noise model?
 - b. The difference in traffic at many of the intersections between supposed existing weekday noise and weekend noise devoid of school traffic barely differs. For example Ave L-4 and 60th is a two head dead end segment used by many students to get to/from school and avoid traffic bottlenecks. It is only used on the weekends by residents whose streets directly connect to the dead end segment. The traffic from students on a school day is 3 times more than on weekends, however noise is modeled so that weekday noise differs from weekend noise by only 2 dBA (53.6 and 51.6).

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4. Vehicular operational noise was modeled to predict future noise levels for roadways and compared with predications of noise generated by the projects.
 - a. Why do the future predictions for noise on 60th Street south of Ave L-4 increase by 5.1 dBa? The majority of the land is already developed as homes so why would future predictions of noise be so high? The only reason future traffic noise would increase would to be get the super center projects, but this number is suppose to reflect noise with out the projects.
 - b. By inflating the future predications values it is no surprise that in comparison when predicted increase in noise generated by the projects, they show less than the significant 1.3 increase.

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The final EIR should eliminate delivers after 9:00 at night or before 9:00 on weekends so residents can sleep.

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Population, Housing & Employment Forecasts

1. Table IV shows 2004 SCAG forecasts for population, this is the same group who noted in the 2007 Economic Report of Lancaster that the AV area had a large percentage (> 10%) of workers in the construction sector so a downturn in the housing market world have an adverse effect on the job market in the area. They predicted no housing problem in the future. Just how accurate is this population predication.
2. Both projects have identical estimates for the number of construction workers, 865. How can this be when the project sizes, building layouts, and types of retail stores are different for each project?
 - a. Both DEIRs claim construction workers travel from job to job, seldom relocating to the job site and the construction jobs generated for the projects may be filled by long distance commuters rather than local workers. The commuters will increase air pollution.
 - b. These jobs are temporary, only lasting for the duration of the construction; therefore, the number of construction job these projects create would have a less than a significant benefit to the local community job market.
3. The Southern California Association of Governments (SCAG) 2007 Economic Report of the City of Lancaster found a majority (56 %) of Lancaster households has an annual household income of less than \$50,000 and half of those are below \$25,000.
 - a. The Commons project estimates a net increase of approximately 927 new jobs and the Lane Ranch project estimates 828 new jobs. These can not be full time jobs based on the number of shops and eating establishments both projects will build.
 - b. Both projects claim some employees will be management level implying high salary positions but both admit the majority of jobs are in the retail, restaurant and fast food sectors which are the lowest paying jobs available. What is the net worth of these low paying jobs to the community?
 - c. The salaries generated by the majority of lowing paying jobs is too low for employees to afford a home in the local neighborhood without receiving state/government assistance or having to work a second job. Employees will have to commute from lower income neighborhoods. This contradicts the statement that the projects would reduce air pollution because employees will come from the local neighborhood and not be commuting.

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Public Services

Fire

Admitted in the summary for both projects is the requirement for increased manpower, equipment, and facilities to accommodate the increased demand for fire services. The mitigation method is payment of

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developer fees. Payment of the fee does not guarantee the availability of the service during the construction or operational phases.

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Police

1. The Commons project summary identifies a substantial increase in the demand for police services when the vacant site is developed into a commercial center but does not give any mitigation measures. Lancaster city for a number of years has implemented a contract with the stores located at the super center shopping center at Ave J and 20th Street East. This contract has the stores paying the salary for 40 hours a week policing at their shopping center. A similar contract needs to be implemented for the increase crime rates a commercial center will bring to the neighborhood.
2. The Lane Ranch project summary does not believe there will be an increase in policing services when the ranch is converted to a super center. How can this be? The ranch currently located on the property does not offer a monetary incentive for criminal activity but turning the ranch into a commercial center with multiple stores, fast food and restaurants will increase criminal opportunities. Crime follows the money. Even shop lifting and vandalism will increase from its current non existence level.
3. Mitigation measures to reduce crime are fencing during the construction phase and lighting and building security systems for the operational stores. There is no increase for policing the area once the projects become operational.
4. There are no mitigation measures identified in the draft EIR to protect the local residents from spill over crime such as vehicle theft, home invasion, burglaries or crimes against persons. This is the crime residents are most interested in, not in protecting the commercial structures and their contents.
5. There are no mitigation measures to protect students from spill over crime such as vehicle theft or crimes against persons. At the very least an additional sheriff paid for by the commercial centers should be patrolling the school perimeter and parking lots an hour before school, during school hours, an hour after school and during school events held outside normal school hours.
6. Both DEIRs claim there is no unique law enforcement issue specific to the proposed project. That is incorrect, the corner of Ave L and 60th Street West is under Lancaster jurisdiction, adjacent to the Lane Ranch project and on the other side of the high school are unincorporated Los Angeles areas which are under California Highway Patrol jurisdiction. Just a mile down 60th Street West it becomes Palmdale's responsibility. What law enforcement agency will service crime crossing these jurisdiction borders? When a call for assistance is made, will every agency say it's not their responsibility? This issue is not addressed even thou the requested for its inclusion in the draft EIR can be found in the public comments appendix.

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A comparison with an existing discount super center's crime rate to a residential neighborhood located miles from a commercial center needs to be included in the final EIR, that way the actual increase in crime to the neighborhood can be estimated more accurately. An even better comparison would be the crime rate of a neighborhood before a discount super center was built and the rate after the commercial center was built. Lancaster city should be able to provide this data from any one of their already existing super centers.

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Transportation and Traffic

1. Traffic data gathered for use in the DEIR was collected using manual methods instead of an automated device.
2. National Data & Surveying Services, the company used to collect the traffic data doesn't even have a web site so it is no surprise they don't own a automated counting device. Many be they should have borrowed one from the city or county.
3. Instead of collecting 24 hours of data to determine peak hours, data was only collected for 4 hours on 5 days.

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- a. The days in which the data was collected were on 2 days the week of Memorial which also happened to be minimum school days.
 - b. There was only one weekend collection day, Saturday, the day after school was over for the year when many residents leave with their school children for vacation.
 - c. The other two collection days were the 1st and 2nd weeks after school starts in August.
 - d. The hours were also carefully chosen to not cover the actual heavy traffic hours and then 1 hour of the day was thrown away to represent a 'peak hour' of traffic.
4. Peak traffic data is not representative of actual traffic. The supposed 'AM peak' hour captures only the last half hour of school traffic. The PM peak hour does not capture school traffic at all; it was taken an hour or more after school let out (junior high school lets out earlier than the high school).
5. The PM traffic captures little if any commuter traffic since it was taken between 4:00 PM and 6:00 PM with a supposed peak time of 5:00. This is a neighborhood of commuters, most get off work at 5:00 and typical commute time is at least an hour.
6. The majority of differences between AM peak with the tail end of school traffic and PM peak with no school traffic about 50 vehicles. Did students fly over the intersection on their way to school or did they all cram into the few additional cars?
7. An independent manual count taken in February 2009 at the corner of 60th Street west and Ave L came up with hundreds of more cars going in a single direction than is identified in the DEIRs.
8. The suggestion to mitigate traffic by increasing the number of traffic signals from the current 3 on 60th between Ave J and Ave M by an additional 6 will increase delays for residents just trying to get in and out of their homes. The 4 mile gantlet of 9 traffic signals needs to be synchronized to prevent idling traffic and to allow residents to complete the distance without having to stop and wait a wait every few 10ths of a mile just to get to or from their home.
9. Deliveries should be prohibited for one hour before school starts or ends and one half hour after school starts and ends to allow school traffic to disperse.
10. Delivery trucks should be prohibited from using side streets. Enforce this by fining both the store and the delivery truck an increasing amount every time they violate it. The fine starts at the amount charged for running a red light and increases by \$1,000 for each subsequent violation. The funds collected will go toward street maintenance of the road – LA County for streets in unincorporated jurisdiction, Lancaster or Palmdale for streets maintained by either city. This is fair since a 40 ton truck causes as much road damage as 6,400 vehicles. Violations can be documented by residents with a photo and or written account denoting location, time and truck identification.
- a. Delivery trucks using side streets it will make it unbearable for residents of the side streets and the neighborhood residents traveling out or into the neighborhood.
 - b. Many residents will be forced to resort to side streets to avoid traffic signals and traffic; in particular L-8 will become the main egress in and out of the neighborhood.
11. The DEIRs' report that the added traffic volume generated by the project will significantly impact traffic flow at 15 of the intersections. The analysis states that future operating conditions would be degraded without road widening and that an increase from one to three lanes reduces the impacts to a level of insignificant.
- a. They also note that most areas have one lane in each direction currently and the ultimate street widths will provide 3 lanes in direction.
 - b. So why are the suggested improvements only adding an additional lane and not the ultimate 3 in directions that would reduce the traffic impact to insignificant levels?
 - c. The suggestion to mitigate traffic by increasing the number of lanes should be for both directions since shoppers will have to travel in the reverse direction when leaving the commercial super centers. Some suggestions are for an increase only in the directions toward the commercial super centers.

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12. What is a 'fair share' of road improvement costs? Fair is not a definitive number. Is the share based on the number of proposed projects to be built? Does it assume all projects will be built? When would the roads be improved, after all proposed projects complete? If one or more of the projects is not built than what happens to the fair share, will there now be limited funds to widen the road? The road improvements need to be complete before construction starts on the 1st project that way it would insure the collection of 'fair share' funds are really spent to mitigate the road degradation the proposed change to commercial zoning would cause to this residential/rural neighborhood.
13. As the Traffic analysis states until these improvements are implemented there will be significant unavoidable impacts to the 15 intersections. The road widening needs to happen before construction begins for the commercial super-centers to not adversely effect the commute times of residents and students during construction and to ensure the improvements are finished before the stores are opened.

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Utilities & Electricity Appendix

Emissions of greenhouse gas consumption lists 5 single residential units @ 6,665 cubic ft/unit/month, therefore on average for a single unit $6,665/5 = 1,333$. Multi-family residential does not list number of units but has 4,011 cubic ft/unit/month, more than single residential unit. Industrial gives usage by parcel as 241,611, much more than residential. Retail/shopping has square foot in parentheses and gives a value of 2.9, so a retail store of 5,000 square feet (the smallest size store for this proposed shopping center) would use $5,000 \times 2.9 = 14,500$ or much, much more than a residential unit. Where is the usage for a restaurant, fast food store or grocery store?

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Emissions of greenhouse gas from electricity demand lists a 5 single residential units @ 5,626.5 KWH/unit/year, therefore on average for a single unit $5,626.5/5 = 1,125.5$. Now restaurant and food store are considered and once again have square foot in parentheses and gives a value of 47.45 for a restaurant and 53.3 for food store. Using 5,000 square foot for a restaurant (10,300 sq ft identified as the size for a restaurant and fast food) gives $5,000 \times 47.45$ for 237,250 KWH demand, again much, much more than a residential unit. The food store gives a value of $53.3 \times 88,695$ (1/2 of the Super Target size, reduced because not all space is for groceries) = 4,727,443.5, once again much, much, much more electricity demand than a residential house.

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Emissions of greenhouse gas from vehicles scenario is everyone drives 100 miles a day every day of the year. Not in the real world. Assumed mpg is also not real with an assumption of 27.5 for an auto or 21.4 for a light truck.

In the **summary of significant unavoidable operational impacts** for the Commons project, air quality will exceed the thresholds set by AVAQMD thus resulting in a significant and unavoidable impact. Why do the students and residents in the area have to suffer the health risks brought by these projects? Most home owners bought in the neighborhood to escape urban problems and insure their children attended the best schools in the Antelope Valley. Now they and the students will suffer. The potential for convenient discount retail and fast food shopping exceeding the demand by 145% is far out weighed by the air quality damage residents and students will be stuck with.

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According to the DEIR, the **Southern California Association of Governments (SCAG)** is not an air quality management agency but it is responsible for developing transportation, land use and energy conservation measures that affect air quality. It provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies.

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1. The Southern California Association of Governments (SCAG) 2007 Economic Report of the City of Lancaster found a majority (56 %) of Lancaster households has an annual household income of less than \$50,000 and half of those are below \$25,000.

2. The report identified the largest numbers of workers are found in the lowest paying jobs of retail sales and food services.
3. The report identified a larger than normal (>10%) number of jobs were in the construction sector. is suffering the most with the housing crash and recession/depression.

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Shopping centers near a freeway may draw in out-of-area customers but a store far from a freeway has only the residents from the local neighborhood to draw from. The potential customer base in this neighborhood is limited to begin with and they can only buy so many school supplies, groceries, garden and home improvement products.

Economic, Fiscal & Urban Decay Appendix

1. None of the 67 retail stores in historical Quartz Hill business district were included in the analysis for urban decay. The Quartz Hill business districts is located 1 mile away and will suffer more urban decay than the Lancaster stores, located further away that were included in the urban decay analysis.
2. Saturating the AV by adding two more super centers eats into the sales of the four existing super centers. Cannibalizing same store sales can close existing stores leaving abandoned monolithic sized buildings. The Avenue L and 60th Street West location cannot economically support one super center let alone two.
3. The city will not benefit with the addition of these super centers as shoppers transfer their patronization from one Lancaster store to another the sales tax money the city collects will remain the same! But the costs associated with the super centers in policing services, road repair and other infrastructure maintenance will only drain Lancaster's already limited funds.
4. Retail stores competing against super centers are closing in record numbers leaving fewer shopping alternatives for everyone. Last year 4,500 retail stores closed and analysts predict as many as 7,000 additional retail stores could close this year as consumers cut spending and retailers struggle to finance their inventories.
5. This neighborhood is overstocked with unsold and foreclosed homes that won't be legally occupied any time soon. When people face foreclosure or other financial problems they do not spend their limited funds maintaining their homes and yards. The customer base is further reduced because abandoned or unoccupied homes do not house customers.
6. The economic analysis claims direct impacts occur primarily in the City of Lancaster. The projects site is on the boarder of Los Angeles County's unincorporated Quartz Hill community and is located 1 mile from the boarder of Palmdale, both of these communities will receive a direct economical impact if these projects are built.
7. The attached economic document is incomplete; it has numerous blank costs values and empty values in the tables.
8. The table listing the potential competitive shopping centers does not include the Quartz Hill business district located 1 mile from Ave L and 60th Street West. It does not include the 40th Street West and Ave L Vons shopping center two miles away nor does it include the 50th Street West (a.k.a. Rancho Vista Blvd) and Ave N Albertsons shopping center 3 miles away. Of the 9 shopping centers listed all but the non existent 60th Street West and Ave K center are located further away then the existing shopping centers in this area.
9. The economic document analyses the 2 competing super center projects for garden and home improvement merchandise but ignores the Quartz Hill garden shop, hardware and building materials stores located 1 mile away in the business district of Quartz Hill. It ignores the existing grocery stores, restaurants, fast food of the Quartz Hill business district and the Vons or Albertsons shopping centers. Why are the nearby existing stores ignored creating a false no impact conclusion to urban decay?
10. The only time a store in either the Vons shopping center or the Albertsons shopping center is included in the economic analysis is for the drug stores. Once again the drug store located closer

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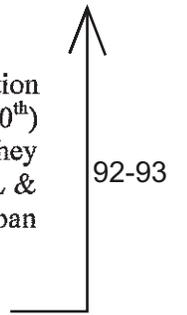
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on 50th Street West in the Quartz Hill business district is ignored. The conclusion is the creation of the super center projects on drug store patronage in the Vons shopping center (Ave L and 60th) and Albertson's shopping center (Rancho Vista Blvd & N) would not be impacted because they are on major roadways but the two drug stores located further away on the same streets (Ave L & 30th and Rancho Vista Blvd & 30th) with an increased number of lanes will be at risk for urban decline. How can this be?





COUNTY OF LOS ANGELES

FIRE DEPARTMENT

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P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

April 6, 2009

Ms. Jocelyn Swain
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain:

DRAFT ENVIRONMENTAL IMPACT REPORT, PROJECT TITLE: THE COMMONS AT QUARTZ HILL, NOTICE OF AVAILABILITY THE COMMONS AT QUARTZ HILL PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (EIR), SCH NO. 22007061059, LANCASTER (FFER #200900010)

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

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PLANNING DIVISION:

PUBLIC SERVICES - FIRE PROTECTION OPERATIONAL – RESPONSE DISTANCE: TABLE I-1 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

1. The paragraph under this heading contains some inaccuracies and should be revised as follows: "The project site is within a 1.8-mile radius of the Los Angeles County Fire Department (LACFD) Fire Station 84 which is the jurisdictional station (1st-due) for this project. It has a 3-person engine company and a 2-person paramedic squad. Based on the distance to the project site it is estimated to have an emergency response time of approximately 6 minutes which is well within the Department's goal of 8 minutes for first arriving units in suburban areas (the City of Lancaster is a mix of urban/suburban areas). In addition, the project site is within a 4-mile radius of two other LACFD Fire Stations, Fire Station 130 which houses a 3-person engine company and 3-person USAR unit and Fire Station 134 which houses a 3-person assessment engine company and a 2-person paramedic squad. The Fire Department's current five-year facility plan includes a future Fire Station in the vicinity of

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SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

Avenue K-8 and 70th Street West, which is 1.3 miles from the project site and within the Fire Department's desired service radius of 1.5 miles per station in urban areas. Development of this facility is contingent upon several factors including the pace of development in the vicinity of the planned station and sufficient funding for station development and ongoing staffing costs. Any impact this project may have on Fire Department services will be mitigated by the payment of developer fees in effect in the project area prior to the issuance of the first building permit for this project."

93-2

ENVIRONMENTAL SETTING

2. Paragraph 1, the last sentence should be revised to state "The estimated response time to the project site is approximately 6 minutes." Paragraph 2 should be corrected to state that Fire Station 134 is staffed with a 3-person assessment engine, which is an engine company with some limited paramedic capabilities and a 2-person paramedic squad and Fire Station 130 is staffed with 3-person engine company and a 3-person Urban Search and Rescue unit.
3. Regulatory Framework General Plan While the City's performance objective for fire protection is a 7 minute response time to rural areas, the Fire Department uses guidelines of a 5-minute response time for the 1st-arriving unit for fire and EMS responses and 8 minutes for the advanced life support (paramedic) unit in urban areas, an 8-minute response time for the 1st-arriving unit and 12 minutes for paramedic units in suburban areas, and a 12 minutes response time for the 1st arriving unit and 20 minute response time for paramedic units in rural areas. The City of Lancaster is a mix of urban/suburban areas, thus the current average response time of 6 minutes for this area in well within the Fire Department's response time goals.

93-3

93-4

ENVIRONMENTAL IMPACTS, PROJECT IMPACTS, RESPONSE DISTANCE

4. The paragraph should be replaced with the paragraph provided above under the heading Operational - Response Distance.

93-5

CUMULATIVE IMPACTS

5. The third sentence is incorrect. The wording government funding should be deleted. The LACFD does not receive any government funding to provide fire services in the project area.

93-6

LAND DEVELOPMENT UNIT:

1. We have no comments at this time.

93-7

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation,

93-8

Ms. Jocelyn Swain
April 6, 2009
Page 3

fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

93-9

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

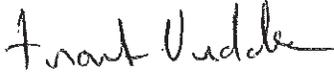
HEALTH HAZARDOUS MATERIALS DIVISION:

1. We have no comments at this time.

93-10

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:lj



Copy Forwarded to Planning for Response KT

FAX - (661) 723-6141

March 5, 2009

Dear City of Lancaster Planning Commissioners and City Council:

I strongly object to the WalMart and Target being considered for construction on the corner of 60th and L Street. Please do not change the zoning for these two supercenters.



94-1

First of all, have you ever gone to the corner of 60th and L during school traffic. Well, it is chaos! Do you really think it is wise to mix Walmart and Target traffic with young people (new drivers) as they rush to and from school? The safety of our youth will be comprised. Consider also that both of these stores get a high volume of traffic during the holidays, Let's not forget that WalMart opens early and closes late which will collide with sports events and school activities.



94-2

Secondly, WalMart representatives allege that the new store will provide jobs, which sounds appealing with the current economic crisis and unemployment woes. However, let's come to our senses about the kind of jobs being provided. Have we forgotten what we've read, heard, watched on the news regarding WalMart employees' low wages, mistreatment, and outsourcing to foreign countries. Is this what America needs - Is this what the Lancaster needs?



94-3

In my opinion WalMart is much more concerned about making money than providing jobs or providing sales tax revenue to the surrounding community as it's representatives profess. Please refer to the attached article from the Internet regarding WalMart requesting to build on civil war battleground. Let me say it again, WalMart wants to build near an historic civil war site. So let's exchange the preservation of an American historic site for a moneymaking, low paying, possibly vacant in the future, shopping center. Good exchange? Hmm, I don't think so. Where was WalMart's concern for that community?



94-4

Oh, and by the way, do we really need another WalMart? There are already four in the Antelope Valley. WalMart shamefully left one building vacant on the eastside of Palmdale while it moved to a new location on 10th Street West. Where was the community concern then I wonder? The vacant building blighted that area for several years until finally Factory 2 U moved into the building. Now we have a new super Walmart center at 15th Street West, which is right next door to the vacant building where the Walmart was previously located.



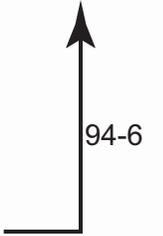
94-5

The Quartz Hill/Lancaster area has been able to maintain a small town feel with mom and pop stores still in existence. WalMart will wipe them out in a hurry. I do not feel that they are concerned about this community at all. This community can easily make their way over to the other WalMarts if they chose to shop there. The same goes for the Target center.



94-6

Please consider this my protest against rezoning for the building of a WalMart and Target. Please listen to those in this community who are objecting to the building of a WalMart and Target because they are concerned for the safety of our children, concerned about the traffic problems this will create, and concerned that this property is being rezoned for solely profit and not for the benefit of this community.



Sincerely,

Steve Smith
Lancaster, California

For your response but not for public use - my e-mail: becroxanne@aol.com



Wal-Mart, Historians Battle Over Building Store Near Civil War Site

Friday, January 02, 2009

Associated Press

LOCUST GROVE, Va. —

Wal-Mart wants to build a Supercenter within a cannonshot of where Robert E. Lee and Ulysses S. Grant first fought, a proposal that has preservationists rallying to protect the key Civil War site.

A who's who of historians including filmmaker Ken Burns and Pulitzer Prize winner David McCullough sent a letter last month to H. Lee Scott, president and CEO of Wal-Mart Stores Inc., urging the company to build somewhere farther from the Wilderness Battlefield.

"The Wilderness is an indelible part of our history, its very ground hallowed by the American blood spilled there, and it cannot be moved," said the letter from 253 scholars and others.

Wal-Mart and its supporters point out that the 138,000-square-foot store would be right behind a bank and a small strip mall, a full mile from entrance to the site of the 1864 clash that left thousands dead and hastened the war's end.

Local leaders also want the \$500,000 in tax revenue they estimate the big box store will generate for rural Orange County, a gradually growing area about 60 miles southwest of Washington.

"In these economic times, the fact that Wal-Mart wants to come into the county is an economic plus," said R. Mark Johnson, a tire shop owner and chairman of the county's board of supervisors. "This is hardly pristine wilderness we're talking about."

Grant's Union troops were headed to Richmond on May 4, 1864, when they confronted Lee's Confederate Army of Northern Virginia. The Battle of the Wilderness involved more than 100,000 Union troops and 61,000 Confederates. The fighting, according to National Park Service estimates, left more than 4,000 dead and 20,000 wounded.

Some 2,700 acres of the Wilderness Battlefield are protected as part of the Fredericksburg and Spotsylvania National Military Park.

Preservationists regularly square off against developers in Virginia, where much of the Civil War was fought.

This dispute, however, has stirred an outcry similar to the one in 1994 over The Walt Disney Co.'s plans to build a \$650 million theme park within miles of the Manassas Battlefield. The entertainment giant bowed to public pressure and abandoned the project.

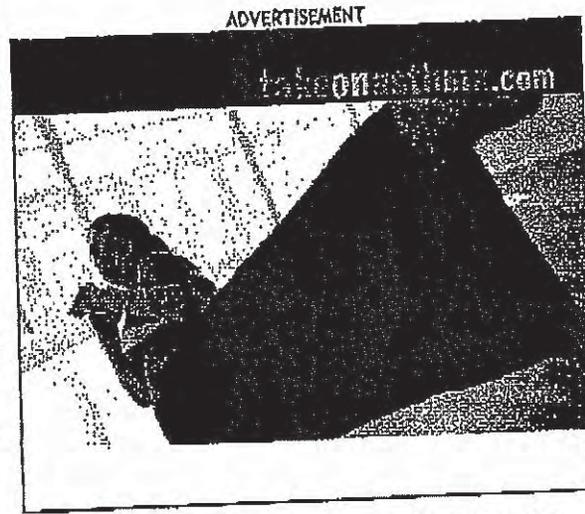
Bentonville, Ark.-based Wal-Mart, which opened nearly 200 stores in the U.S. in 2007, said it studied a lengthy list of sites in Orange County before settling on the spot near the battlefield and its gentle hills dissected by neat footpaths.

"We recognize the significance of the Wilderness Battlefield, but we are not building on the battlefield," said Keith Morris, a spokesman for the world's largest retailer.

Preservationists argue the store site is still significant because it was used as a staging area by Union troops.

"Is it blood-soaked ground? No, but it is a part of the battlefield," said Jim Campi, a spokesman for the Civil War Preservation Trust, which lists the Wilderness Battlefield as endangered.

Supervisors will have the final say, after county planners decide if the retailer should be granted a zoning variance. Hearings likely will be scheduled in February and March.





March 10, 2009



Ms. Jocelyn Swain
Environmental Planner
CITY OF LANCASTER
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms Swain:

I want to follow up with you on my February 23, 2009 letter concerning the "ECONOMIC, FISCAL AND "URBAN DECAY" ANALYSIS for both proposed shopping centers at 60th Street West and Avenue L. The report is Appendix L in the Wal-Mart EIR and Appendix M in the Lane Ranch EIR.

I want to clarify that I was primarily addressing in my letter the Food and Beverage analysis within the report.

It is my understanding the Target store in the Lane Ranch project is not going to be Supercenter.

My letter was not intended to address the Target Store but the Food and Beverage sales within the Wal-Mart Supercenter.

I have attached to this email an Economic Impact Analysis for Expansion of Foothill Ranch Wal-Mart that is dated January 24, 2008 by the Natelson Dale Group.

As stated in the Introduction of this Analysis:

This study evaluates the potential economic impacts of the proposed expansion of the existing Wal-Mart store in Foothill Ranch (City of Lake Forest) into a Wal-Mart Supercenter. The expansion is proposed at the existing shopping center located on 26502 Towne Center Drive. For purposes of this analysis, the project is assumed to be completed in mid 2009 and would include a 41,283 square foot expansion area, which would primarily be devoted to new food/grocery sales. Thus, the economic impact focuses strictly on the potential impacts in the food/grocery sales category. In particular, the analysis addresses two key issues:

- 1. The extent to which there would be sufficient demand to support the new Wal-Mart food sales space without negatively impacting the long-term market shares of existing supermarkets in the trade area; and**
- 2. The cumulative impacts related to all retail supermarkets projects planned for development in the trade area.**

95-1

95-2

Ms. Jocelyn Swain
March 10, 2009
Page Two

The Foothill Ranch report is 24 pages discussing the effects on **existing and future Food Stores**.

I want to direct you to pages 41 and 42 of the HR&R report, **Food Stores, including Supermarkets, Other Food Stores and Beverage Stores**.

In the HR&R report there is essentially one page, 20 lines addressing the same issue that the Foothill Ranch report discusses in 24 pages.

The Foothill Ranch Study analyzed the existing supermarkets and food users and stated the square footage of each store.

As an example the Vons at 40th Street West and Avenue L, would state 49,860 square feet. The square footage stated in the report was for the entire building which includes the sales floor area and stock room area.

I do not know where HR&R obtained the square footage numbers in its report for the Wal-Mart Supercenter.

The HR&R Report states the Wal-Mart will have 49,800 square feet of area for the sale of food and beverages. I question if the square footage assumption of 49,800 square feet will be the limit of this sales area within the Wal-Mart Supercenter.

When the existing Wal-Mart Supercenters in East Lancaster and East Palmdale expanded into Supercenters, the expansion area was in excess of 71,000 square feet and is now occupied by the food/beverage components for those respective buildings.

The HR&R Report states there will be approximately 73,000 square feet of food and beverage sales area at 60th & L, I believe the square footage number used in their analysis should have stated 93,200 and thus reflect 71,000 square feet being allocated to the Wal-Mart Supercenter.

I would expect the revised report or new report on Urban Decay to address the impact the 71,000 square foot food and beverage area within the Wal-Mart Supercenter on the existing food and beverage operators in the stated 5-mile primary trade area and the 10-mile secondary trade area.

I again state the HR&R Report analyzed the "Projected Supply of Additional Food/Beverage Space" based upon unrealistic future population growth with inflated household incomes.

95-2

95-3

95-4

Ms. Jocelyn Swain
March 10, 2009
Page Three

Ms. Swain, I would appreciate if would please advise me on what the process will be going forward on addressing the Urban Decay on the food and beverage operators in the 5-mile primary trade area and the 10-mile secondary trade area.

95-5

I want to also address at this time what is currently zoned commercial property at the intersection of 60th Street West and Avenue L.

I attended the Planning Commission General Plan Update hearing on March 2nd.

The Commissioners discussed a topic that I was not aware of concerning commercial property within the City of Lancaster. I learned the current General Plan has 2 separate zone designations for office and retail properties.

It was not until that Planning Commission hearing that I understood why Lane Ranch was applying for a General Plan Amendment for their development.

Prior to the March 2nd Planning Commission hearing, I thought the entire Lane Ranch property was zoned for retail development.

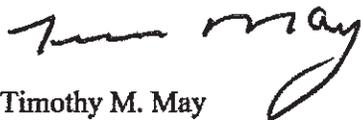
95-6

It is now my understanding the 35-acre Lane Ranch Development is zoned a combination of Commercial retail and Commercial office.

I would expect that the Lane Ranch General Plan Amendment would be a lower density of use from office to retail.

I am only clarifying the zoning issue because I would not view the Lane Ranch application as a zone change given the property is currently zoned commercial unlike the Wal-Mart property, which is zoned residential.

Sincerely;



Timothy M. May

APPENDIX B

ECONOMIC IMPACT ANALYSIS



**ECONOMIC IMPACT ANALYSIS
FOR
EXPANSION OF FOOTHILL RANCH WAL-MART**

January 24, 2008

Prepared by:

**THE NATELSON DALE GROUP, INC.
24835 E. La Palma Avenue, Suite I
Yorba Linda, CA 92887
Telephone: (714) 692-9596
Fax: (714) 692-9597
Email: info@natelsondale.com**

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I. INTRODUCTION

This study evaluates the potential economic impacts of the proposed expansion of the existing Wal-Mart store in Foothill Ranch (City of Lake Forest) into a Wal-Mart Supercenter. The expansion is proposed at the existing shopping center located on 26502 Towne Center Drive. For purposes of this analysis, the project is assumed to be completed in mid 2009 and would include a 41,283 square foot expansion area, which would primarily be devoted to new food/grocery sales. Thus, the economic impact analysis focuses strictly on potential impacts in the food/grocery sales category. In particular, the analysis addresses two key issues:

1. The extent to which there would be sufficient demand to support the new Wal-Mart food sales space without negatively impacting the long-term market shares of existing supermarkets in the trade area¹; and
2. The cumulative impacts related to all retail supermarket projects planned for development in the trade area.

Assumed Sales Performance of Wal-Mart Supercenter

The analysis assumes that the proposed project would generate total annual grocery sales of \$29,329,875. This projection is based on a sales per square foot factor of \$710.00².

Description of Trade Areas Evaluated in This Study

According to the International Council of Shopping Centers (ICSC) – the premier trade association of the shopping center industry – a stand-alone supermarket would typically have a primary trade area of 3 miles or less. The proposed project, however, would create a “supercenter” (combining a general merchandise store with a full-scale supermarket) and would therefore be expected to draw consumers from a larger trade area (consistent with the typical trade area for a community-scale facility). Reflecting this “dual” characteristic of a supercenter, the market area boundaries have been defined in terms of two radii:

- A Primary Market Area (PMA): a 3-mile radius around the project site, corresponding to the typical trade area for a supermarket or neighborhood shopping center; and
- A Secondary Market Area (SMA): a 6-mile radius around the project site, excluding the inner radius of the PMA (i.e., the SMA is the outer 3-6 mile “donut”), corresponding to the trade area for a community-scale shopping center.³

¹ The analysis focuses on supermarkets rather than convenience-type food stores since the Wal-Mart grocery component is directly comparable to a full-scale supermarket. Retail and grocery market analysts generally regard convenience stores to be in a different market niche from supermarkets; thus, it is not expected that the proposed Wal-Mart would significantly affect stores in the convenience category.

² This factor was derived by TNDG based on sales performance data for Wal-Mart Supercenters from Progressive Grocer's 2007 Super 50 publication. This publication provides sales performance data for the top 50 supermarket chains (those with a minimum of \$2 million in annual sales) in the U.S.

³ According to the Shopping Center Definitions published by the International Council of Shopping Centers (ICSC), the primary trade area for a typical grocery-anchored community center between 100,000 and 350,000 square feet is 3-6 miles. Although it is sometimes possible to draw customized trade areas that reflect specific shopping patterns of residents and traffic patterns, doing so in this case would be arbitrary without the availability of this type of information. Thus, we have relied on this standard approach used in retail market analyses by analyzing a 3- and 6-mile radius surrounding the proposed project site. Further, when marketing properties to prospective tenants, developers' retail leasing representatives usually identify market demographics within a defined radius of the site, indicating that this is valid approach to evaluate market support for a particular project.

Hereinafter, the PMA and SMA combined are referred to as the Foothill Ranch Trade Area.

Overview of Methodology

The analysis forecasts the total resident demand for supermarket sales within the evaluated Foothill Ranch Trade Area, and uses this projection of total demand as the basis for determining the extent to which the proposed project could be supported in the market area without negatively impacting existing supermarkets. The analysis includes the following major steps:

1. Estimate the current demand for food sales in the two trade areas, based on existing demographics (including income characteristics);
2. Estimate the "potential" aggregate sales per square foot of existing supermarkets in the two trade areas, based on the potential demand estimates from Step 1 and the actual square feet of existing supermarket space in the trade areas;
3. Estimate the "adjusted" aggregate sales per square foot of existing supermarkets in the two trade areas, after accounting for the projected grocery sales of the Wal-Mart expansion (i.e., assuming that Wal-Mart's sales are diverted from existing stores, what would the "post Wal-Mart" sales potential of the existing stores be?). In addition, estimate "adjusted" aggregate sales per square foot of existing supermarkets in the two trade areas, after accounting for the *cumulative* grocery sales of the Wal-Mart expansion and other planned/pending supermarkets in the trade area; and
4. Compare the "post Wal-Mart (including other planned/pending projects)" sales potentials of the existing stores to grocery industry "benchmarks" to determine if any sales diversions would potentially be severe enough to result in closure of existing stores.

What this Study Provides

Since this study is being completed as part of the environmental impact report (EIR) process for the proposed project, it focuses strictly the types of economic impacts that are defined as significant by the California Environmental Quality Act (CEQA). Specifically, per Section 15131(b) of the CEQA Guidelines, a project's economic impacts on a community are considered significant only if they can be tied to direct physical impacts. The Fifth District Court of Appeal in *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184 provided that a significant adverse physical change in the environment resulting from the economic impacts of a proposed retail project, or "urban decay", is characterized by a chain reaction of store closures and long term vacancies ultimately destroying neighborhoods. Based on the direction of the Court of Appeals, the City of Lake Forest has determined that the proposed project would have a significant impact only if the expansion of the Wal-Mart resulted in a diversion of sales from existing supermarkets that is severe enough to lead to business closures, and in turn, the resulting supermarket closures are significant enough in scale to result in long term vacancies which affect the viability of existing shopping centers or districts.

What this Study Does Not Provide

Given the CEQA-defined focus on physical (blighting) impacts, this study is not intended to quantify all potential economic impacts that the proposed project may have on existing supermarkets and municipalities in the market area. For example, temporary sales impacts to competing supermarkets in the market area (i.e., revenue losses that are not deemed to be severe enough to result in closure of the competitors' supermarkets) would not meet the CEQA-significance threshold and are therefore not specifically addressed in this report.

II. SUMMARY OF CONCLUSIONS

This section provides a brief summary of the study's conclusions.

Primary Market Area

TNDG estimates that the current sales potential for existing supermarkets within the PMA is \$617 per square foot.⁴ With the expansion of the proposed project in 2009, the potential sales per square foot of existing supermarkets are projected to decline to \$545, based on a diversion of some of the existing stores' sales to the Wal-Mart expansion.

Secondary Market Area

TNDG estimates that the current sales potential for existing supermarkets within the SMA is \$600 per square foot. With the expansion of the proposed project in 2009, the potential sales per square foot of existing supermarkets are projected to reach \$617. Although the proposed Wal-Mart expansion would attract some food sales from the SMA, these would be more than offset by new demand resulting from projected population growth in the SMA.

Cumulative Impacts

In addition to evaluating impacts related directly to the proposed expansion, this study evaluates the cumulative impacts to the market based on all known planned and/or pending supermarket projects (including the proposed expansion evaluated in this analysis) in the retail trade area. There is one potential supermarket project in the Foothill Ranch Trade Area. This potential supermarket would reoccupy the former Vons store site, located at 22475 El Toro Road in Lake Forest.⁵ According to City Staff, the property owner's leasing representative is currently marketing the vacant property to various specialty grocers, some of whom have expressed interest in the site. Although no application has been filed with the City, we have assumed that this space will be reoccupied with a supermarket, considering the property owner's intentions of leasing the existing vacant space to another supermarket.⁶ Given that this potential supermarket would be located right on the border of the PMA and SMA, we have allocated the square feet of this potential store evenly between both areas (i.e., 50% of the space in the PMA and 50% in the SMA), based on the assumption that the store would draw approximately one-half of its market support from the PMA and approximately one-half from the SMA. Based on the combined impacts of the Wal-Mart and a potential grocer at the former Vons site, TNDG projects that the potential sales per square foot of existing supermarkets in the PMA and SMA would decline to \$510 and \$602 per square foot, respectively, in 2009.

⁴ It should be noted that the square feet of supermarket space used to calculate this estimate does not include the recently closed Vons store (located at 22475 El Toro Road in Lake Forest). This store closed in June 2007 and is now vacant.

⁵ According to City Staff, (Jessica Gonzalez, Economic Development Department), the property owner's leasing representative is currently marketing the vacant property to various specialty grocers, with some expressing interest in the site.

⁶ There were also six grocery markets developed in the Foothill Ranch Trade Area in 2007. However, all of these markets have been accounted for in the existing inventory of supermarket space (see Table III-1 on page 7).

Urban Decay Findings

The cumulative impacts resulting from the proposed Wal-Mart expansion and one additional potential supermarket would result in a loss of business at existing supermarkets. However, the estimated current average sales levels for supermarkets in the trade area are significantly higher than the national or regional averages for this category on a per square foot basis. Although average revenues would decline, they would drop to levels that are still well above the regional average for supermarket sales, and then would rise again due to growth in local demand. As such, TNDG concludes that the cumulative economic impact resulting from the opening of two new supermarkets (the planned Wal-Mart expansion and a potential store at the former Vons site) would not be severe enough to force the closure of any existing supermarkets. Therefore, no vacancies of retail facilities would be created, and no potential for physical deterioration or urban decay would result.

It should be noted that the conclusions summarized above are based on the assumption of modest population growth in the two trade areas (especially in the PMA, where population is projected to grow at annual average rate of 0.9% over the next five years). In actuality, long-term population growth in the City of Lake Forest could be substantially higher. As described further in Section III-D of this report, the City is currently considering re-zoning about 800 acres of land for residential uses. This would potentially allow for the construction of 5,000 new dwelling units (or about 22% more than now exist) in the PMA. Thus, the indicated sales diversions from existing supermarkets could be even less significant than indicated above.

III. RETAIL DEMAND ANALYSIS SUMMARY

As part of this analysis, The Natelson Dale Group, Inc. (TNDG) completed an inventory and "windshield" survey of all existing supermarkets in the Foothill Ranch Trade Area. The main purpose of this survey was to provide a quantitative and qualitative measure of the overall "health" of the retail grocery market in the trade areas. A summary of these findings is provided on Table III-1 on the following page.

III-A. EXISTING CONDITIONS IN FOOTHILL RANCH TRADE AREA

Based on this field survey, there are no apparent indications of economic or physical decline among the existing supermarkets in the trade area. TNDG estimates that supermarket space in the Foothill Ranch Trade Area, as of October 2007, totals approximately 931,148 square feet (approximately 248,445 square feet of this total is located in the PMA⁷). There is one existing vacant supermarket in the Foothill Ranch Trade Area. However, as discussed on page 4, this former Vons store will potentially be reoccupied by a new supermarket in the foreseeable future. According to City of Lake Forest staff, the closing of the Vons store located at 22475 El Toro Road in Lake Forest was a result of the chain's companywide restructuring plan that included closing underperforming stores. In addition, a Vons store located at 4800 Irvine Boulevard in the City of Irvine (Northwood Town Center) closed in September 2007 in order to allow for the opening of a new larger Pavilions store located nearby at the corner of Portola Parkway and Culver Drive. As shown on Table III-1 below, this store was reoccupied in November 2007 by Zion Market, a Korean Grocer.

⁷ The existing Stater Bros. store on 22351 El Toro Rd, Lake Forest, is located directly on the boundary between the PMA and the SMA. Thus we have allocated 50% of the store's square feet to the PMA and 50% to the SMA.

**Table III-1:
Existing Inventory of Supermarkets
Foothill Ranch Trade Area**

Store Name	Address	City	Square Feet
<i>PMA</i>			
Ralphs	26751 Portola Parkway	Lake Forest (Foothill Ranch)	46,675
Irvine Ranch Market*	26741 Rancho Parkway	Lake Forest	17,000
Vons	28571 Los Alisos Boulevard	Mission Viejo	43,661
Ralphs	27730 Santa Margarita Parkway	Mission Viejo	40,925
Henry's	27765 Santa Margarita Parkway	Mission Viejo	40,656
Ralphs	21751 Lake Forest Drive	Lake Forest	37,025
Stater Bros.**	22351 El Toro Road	Lake Forest	22,503
Subtotal			248,445
<i>SMA</i>			
Stater Bros.**	22351 El Toro Road	Lake Forest	22,502
Ralphs	31481 Santa Margarita Parkway	Rancho Santa Margarita	44,685
Albertsons	21672 Plano Trabuco Road	Trabuco Canyon	49,925
Pavilions	22451 Antonio Parkway	Rancho Santa Margarita	57,000
Albertsons	23072 Alicia Parkway	Mission Viejo	45,278
Ralphs	26911 Trabuco Road	Mission Viejo	24,526
Ralphs	25104 Marguerite Parkway	Mission Viejo	40,000
Trader Joe's	25410 Marguerite Parkway	Mission Viejo	9,500
Albertsons	25872 Muirlands Boulevard	Mission Viejo	38,982
Trader Joe's	24321 Avenida de la Carlota	Laguna Hills	10,100
Ralphs*	23716 El Toro Road	Lake Forest	55,000
Albertsons	24251 Muirlands Boulevard	Lake Forest	39,212
Vons	24270 El Toro Road	Laguna Hills	39,000
Stater Bros	24336 El Toro Road	Laguna Hills	38,020
Fresh & Easy*	23719 Moulton Parkway	Laguna Hills	10,000
Ralphs*	6300 Irvine Boulevard	Irvine	54,000
Trader Joe's*	6222 Irvine Blvd	Irvine	12,273
Zion Market***	4800 Irvine Boulevard	Irvine	40,000
Albertsons	14201 Jeffrey Road	Irvine	52,700
Subtotal			682,703
GRAND TOTAL			931,148

Source: TNDG; CoStar Group.

Notes: *Store opened in 2007; **Square feet of store is divided evenly between the PMA and SMA; ***Store replaced former Vons store in November 2007.

III-B. IMPACT OF PROPOSED PROJECT

It is TNDG's conclusion that the proposed project's grocery sales will not have significant negative impacts on existing supermarkets in the trade area. The analysis supporting this conclusion is summarized below.

Project Description: For purposes of this analysis, it is assumed that the proposed expansion would include a 41,283 square foot expansion of the existing Wal-Mart store devoted to grocery sales. TNDG projects that the added supermarket space would generate similar sales levels, on a per square foot basis, as the national average for the supermarket components of Wal-Mart Supercenters. Based on the size and configuration of the proposed expansion, TNDG projects that the grocery component of the Supercenter would generate sales of approximately \$710 per square foot of building space or total grocery sales of approximately \$29.3 million.⁸

Evaluation of Existing Grocery Market: By evaluating the trade area demographic characteristics and the typical portion of household income spent on supermarket goods, TNDG estimates that the current sales potential (year 2007) for existing supermarkets within the PMA is \$617 per square foot. Within the SMA, the potential supermarket sales volume is currently \$600 per square foot. In comparison, the median sales performance for supermarkets in the Western U.S. is approximately \$460 per square foot.⁹

Projected Growth in Grocery Demand: By 2009, the sales potential for existing supermarkets within the PMA and SMA is projected to reach \$628 and \$629 per square foot, respectively.

Conclusion. As discussed above, the current average sales volume of the existing stores is estimated to be significantly higher than the industry median (for supermarkets in the Western U.S.) of about \$460, suggesting that the existing stores are – on average – performing very strongly. Thus, it is likely that an expansion of the existing Wal-Mart would result in reduced sales volumes at the existing stores. Assuming the supermarket component of the Wal-Mart Supercenter expansion opens in 2009, a significant portion of its initial sales would be derived from sales diversions from existing stores in the PMA. TNDG projects that, with the completion of the supermarket expansion in 2009, the sales volumes at the existing supermarkets in the PMA would decrease to an average of \$545 per square foot.¹⁰ By 2012, TNDG projects that there would be sufficient demand to support average sales volumes at the existing stores in the PMA of \$565 per square foot (in 2007 dollars), or about 91% of the current average.

III-C. CUMULATIVE IMPACTS OF SUPERMARKET PROJECTS PLANNED IN THE FOOTHILL RANCH TRADE AREA

Whereas the above section summarizes impacts related just to the proposed Wal-Mart expansion, this section evaluates the cumulative impacts to the market based on all known

⁸ Based on data from Progressive Grocer's 2006 Super 50 publication, the national average sales volumes for Wal-Mart grocery space is \$841 per square foot of sales area. Consistent with the floor plan for the proposed project, TNDG has assumed that the sales area is equal to 84.5% of the gross building space. Thus, the sales volume for the gross building area is estimated at \$710 per square foot (\$841 X 84.5%).

⁹ According to the 2006 edition of the Urban Land Institute's (ULI) Dollars & Cents of Shopping Centers, the median sales volume for supermarkets in the Western United States in 2004 was \$458.41. The national median in 2004 was \$349.41 per square foot.

¹⁰ The proposed Wal-Mart expansion is only projected to capture a limited amount of grocery demand from the SMA (see Section IV-F). Moreover, Wal-Mart's limited sales impact on the SMA would be more than offset by projected population growth. Thus, projected 2009 potential sales volumes (post Wal-Mart) in the SMA would actually be higher than existing (2007) estimates.

pending supermarket projects (including the proposed expansion evaluated in this analysis) in the retail trade area.

There is only one other known planned and/or pending supermarket project in the trade area considered in this analysis.¹¹ As explained above, this potential supermarket, if developed, will essentially replace the closed Vons store on El Toro Boulevard in Lake Forest. Given that this potential supermarket store would be located directly on the PMA/SMA boundary, this analysis allocates 50% of the potential store's competitive space in the PMA and the remaining 50% in the SMA.

The cumulative impacts analysis follows the same approach as described in III-B above. After the proposed Wal-Mart expansion and the opening of a potential new store at the former Vons site, TNDG projects that sales volumes at existing supermarkets would decrease to an average of \$510 and \$602 per square foot (in today's dollars) in the PMA and SMA, respectively. While the combined projects would result in a sustained reduction in the existing supermarkets' sales potentials in the PMA and SMA, the existing stores' sales volumes would still be well over the regional norm of \$460 per square foot, suggesting that the impact would not be severe enough to result in the closure of existing stores

III-D. SUMMARY OF CONSERVATIVE ASSUMPTIONS USED IN THIS ANALYSIS

The final estimates of impacts to existing supermarkets described above in the previous two sections are based partly on two assumptions that TNDG believes is very conservative. We have used these analytically conservative assumptions in order to err on the side of overestimating rather than underestimating potential impacts of the proposed project expansion. In actuality, the sales impacts to existing supermarkets in the Primary and Secondary Market Areas may be significantly less than indicated in this report.

"Unadjusted" Population Growth – The household forecasts used in this analysis are based on official demographic forecasts provided by the Southern California Association of Governments (SCAG). These forecasts show the PMA adding approximately 620 households between 2007 and 2012, equating to an annual growth rate of 0.9%. This is probably an overly conservative forecast given that the City of Lake Forest, as part of a comprehensive planning process, is considering re-zoning nearly 800 acres of undeveloped land in the PMA currently zoned for commercial and industrial uses for residential uses.¹² This plan – "The Lake Forest Opportunities Study" – would potentially allow for the construction of more than 5,000 new homes. If this plan is approved, the new households – which are not accounted for in adopted SCAG forecasts – would represent a significant source of additional market support for supermarket sales in the PMA.

Inclusion of Convenience-Oriented Markets – The inventory of existing supermarkets includes convenience-oriented grocers such as Trader Joe's, Tesco's Fresh & Easy Market, and Irvine Ranch Market. In many respects, these types of stores, given their size (ranging from 9,500 to 17,000 square feet) and focus on convenience, are not direct competitors with full-scale supermarkets, which are often upwards of 50,000 square feet and carry a wider range of grocery items. Given that the model used in this analysis is intended to evaluate demand for

¹¹ For information on planned/pending supermarket projects, TNDG contacted the following Cities (located or partially located in the Foothill Ranch Trade Area): Aliso Viejo, Irvine, Laguna Hills, Laguna Woods, Lake Forest, Mission Viejo and Rancho Santa Margarita.

¹² The City initiated this comprehensive planning process after Orange County residents, in a 2004 countywide election, voted to prevent future aviation uses on the former El Toro Marine Corps Air Station, allowing for current aviation-related land use restrictions in this area of Lake Forest to be lifted.

the supermarket category (see Section IV-B and Appendix A for further detail), we have potentially underestimated residual demand for supermarket sales by including convenience-oriented grocers in the competitive square feet of supermarket space.

IV. RETAIL DEMAND ANALYSIS METHODOLOGY

This section examines potential retail demand for supermarket sale in the market area that would be served by the proposed Wal-Mart expansion.

IV-A. MARKET AREA BOUNDARIES

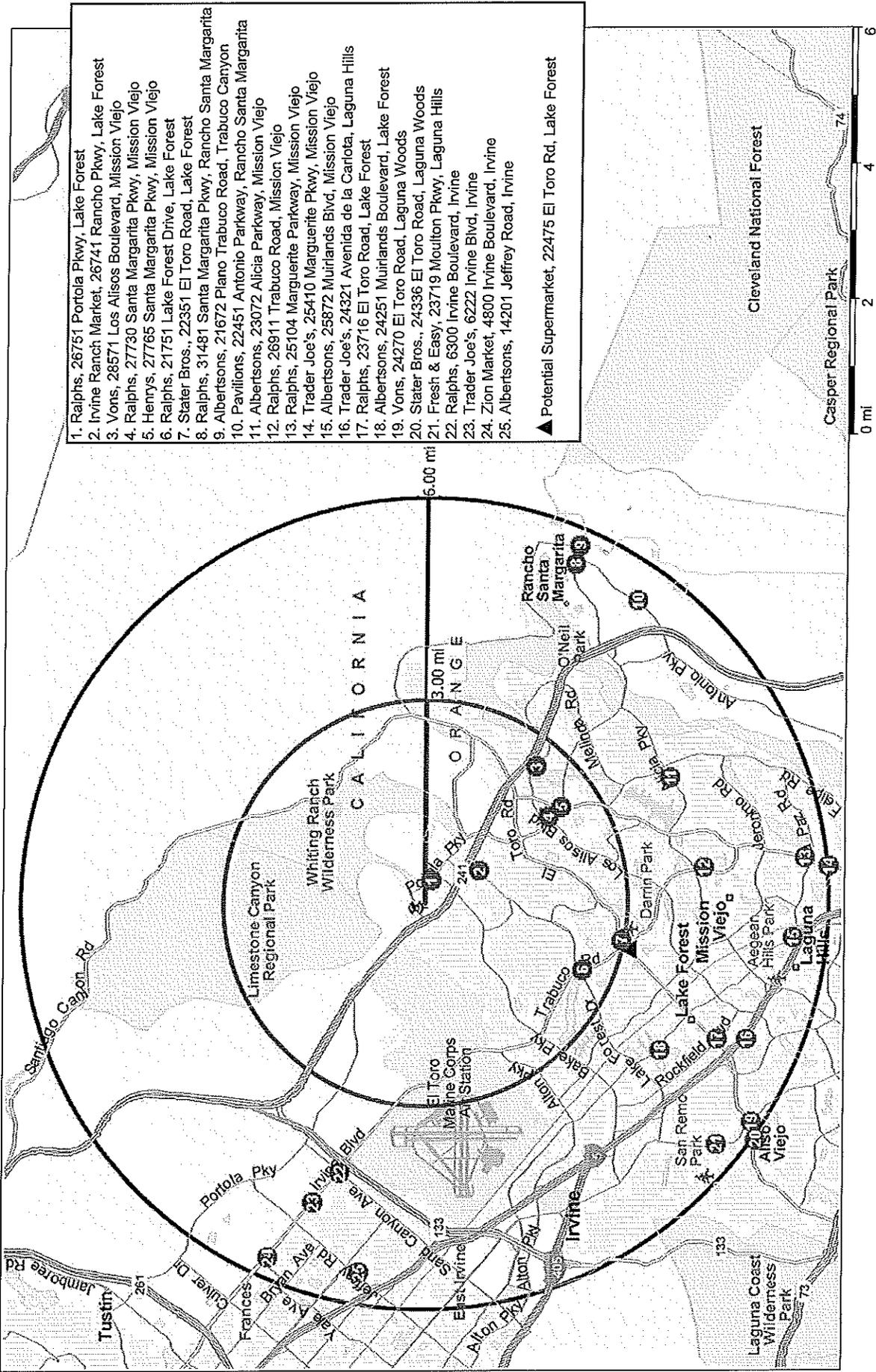
Although a stand-alone supermarket would typically have a primary trade area of 3 miles or less, the proposed project would create a "supercenter" (combining a general merchandise store with a full-scale supermarket) and would therefore be expected to draw consumers from a larger trade area. For purposes of this study, the market area boundaries have been defined in terms of two radii:

1. Primary Market Area (PMA): a 3-mile radius around the project site, corresponding to the typical trade area for a supermarket or neighborhood shopping center; and
2. Secondary Market Area (SMA): a 6-mile radius around the project site, excluding the inner radius of the PMA (i.e., the SMA is the outer 3-6 mile "donut"), corresponding to the trade area for a community-scale shopping center.¹³

The PMA and SMA boundaries are shown in Figure IV-1 on the following page. The entire market area (i.e., Primary and Secondary Market Areas combined) is referred to as the Foothill Ranch Trade Area (FRTA).

¹³ According to the Shopping Center Definitions published by the International Council of Shopping Centers (ICSC), the primary trade area for a typical grocery-anchored community center between 100,000 and 350,000 square feet is 3-6 miles.

Figure IV-1: Foothill Ranch Trade Area



1. Ralphs, 26751 Portola Pkwy, Lake Forest
 2. Irvine Ranch Market, 26741 Rancho Pkwy, Lake Forest
 3. Vons, 28571 Los Alisos Boulevard, Mission Viejo
 4. Ralphs, 27730 Santa Margarita Pkwy, Mission Viejo
 5. Henrys, 27765 Santa Margarita Pkwy, Mission Viejo
 6. Ralphs, 21751 Lake Forest Drive, Lake Forest
 7. Stater Bros., 22351 El Toro Road, Lake Forest
 8. Ralphs, 31481 Santa Margarita Pkwy, Rancho Santa Margarita
 9. Albertsons, 21672 Plano Trabuco Road, Trabuco Canyon
 10. Pavilions, 22451 Antonio Parkway, Rancho Santa Margarita
 11. Albertsons, 23072 Alicia Parkway, Mission Viejo
 12. Ralphs, 26911 Trabuco Road, Mission Viejo
 13. Ralphs, 25104 Marguerite Parkway, Mission Viejo
 14. Trader Joe's, 25410 Marguerite Pkwy, Mission Viejo
 15. Albertsons, 25872 Muirlands Blvd, Mission Viejo
 16. Trader Joe's, 24321 Avenida de la Carlota, Laguna Hills
 17. Ralphs, 23716 El Toro Road, Lake Forest
 18. Albertsons, 24251 Muirlands Boulevard, Lake Forest
 19. Vons, 24270 El Toro Road, Laguna Woods
 20. Stater Bros., 24336 El Toro Road, Laguna Woods
 21. Fresh & Easy, 23719 Moulton Pkwy, Laguna Hills
 22. Ralphs, 6300 Irvine Boulevard, Irvine
 23. Trader Joe's, 6222 Irvine Blvd, Irvine
 24. Zion Market, 4800 Irvine Boulevard, Irvine
 25. Albertsons, 14201 Jeffrey Road, Irvine
- ▲ Potential Supermarket, 22475 El Toro Rd, Lake Forest

IV-B. HOUSEHOLDS AND INCOME LEVELS

The number of households in the FRTA is projected as follows:

**Table IV-1:
Household Projections by Year
Foothill Ranch Trade Area**

Market Area	Projected 2007 Households	Projected 2009 Households	Projected 2010 Households	Projected 2011 Households	Projected 2012 Households
PMA	22,334	22,738	22,942	23,149	23,357
SMA	63,430	66,511	68,107	69,742	71,416
Total	85,764	89,249	91,049	92,891	94,773

Source: Claritas; SCAG; TNDG

The above projections assume the following growth between 2007 and 2012:

PMA - 0.9%
SMA - 2.4%

Average household income levels in the FRTA are estimated as follows.

**Table IV-2:
Average Household Income
Foothill Ranch Trade Area**

Market Area	2007 HH Income
PMA	\$106,337
SMA	\$100,065

Source: Claritas, TNDG

The indicated estimates of household income were obtained from Claritas, a national demographic research services firm. The analysis conservatively assumes that the average household income levels in the trade area will remain constant in real dollar terms.

IV-C. FOOD SALES DEMAND

Household and income characteristics are the primary determinants of the potential dollars available for purchases of goods and services in the market area. The analysis assumes that trade area residents will, on average, spend **8.0%** of their income on food purchases. This factor is based on an analysis of existing taxable sales data and household income characteristics in the FRTA (see Appendix A for explanation on how this factor was derived).

**Table IV-3:
Income and Food Sales Demand
Foothill Ranch Trade Area
In thousands of 2007 constant dollars**

Market Area	2007	2009	2010	2011	2012
PMA	\$2,374,931	\$2,417,872	\$2,439,633	\$2,461,589	\$2,483,744
SMA	\$6,347,123	\$6,655,441	\$6,815,171	\$6,978,735	\$7,146,225
Total Income	\$8,722,054	\$9,073,312	\$9,254,804	\$9,440,325	\$9,629,969
PMA	\$189,994	\$193,430	\$195,171	\$196,927	\$198,699
SMA	\$507,770	\$532,435	\$545,214	\$558,299	\$571,698
Total Food Demand	\$697,764	\$725,865	\$740,384	\$755,226	\$770,397

Source: TNDG

IV-D. SUPERMARKET SALES DEMAND

The analysis assumes that trade area residents will, on average, make approximately **80.7%** of their total food store purchases in supermarkets (see Appendix A for an explanation on how this factor was derived). The total demand for supermarket sales is projected as follows in Table IV-4.

**Table IV-4:
Total Demand for Supermarket Sales
Foothill Ranch Trade Area
in thousands of 2007 constant dollars**

Market Area	2007	2009	2010	2011	2012
Potential Food Sales					
PMA	\$189,994	\$193,430	\$195,171	\$196,927	\$198,699
SMA	\$507,770	\$532,435	\$545,214	\$558,299	\$571,698
Total	\$697,764	\$725,865	\$740,384	\$755,226	\$770,397
Potential Supermarket Sales (@ 80.7% of total Food Sales)					
PMA	\$153,326	\$156,098	\$157,503	\$158,920	\$160,350
SMA	\$409,770	\$429,675	\$439,987	\$450,547	\$461,360
Total Food	\$563,096	\$585,773	\$597,490	\$609,467	\$621,711

Source: TNDG

IV-E. EXISTING SUPERMARKET SALES POTENTIAL

Based on the demand estimates for supermarket sales as shown in Table IV-4 above, and the existing square feet of supermarket space in the trade area (see Table III-1 on page 7), the potential sales per square foot for existing supermarkets is projected as follows in Table IV-5.

**Table IV-5:
Existing Supermarkets' Sales Potential
Foothill Ranch Trade Area**

Market Area	2007	2009	2010	2011	2012
Potential Supermarket Demand (\$000s)					
PMA	\$153,326	\$156,098	\$157,503	\$158,920	\$160,350
SMA	\$409,770	\$429,675	\$439,987	\$450,547	\$461,360
Existing Supermarket Space (Square Feet)					
PMA	248,445	248,445	248,445	248,445	248,445
SMA	682,703	682,703	682,703	682,703	682,703
Potential Sales per Sq. Ft.					
PMA	\$617	\$628	\$634	\$640	\$645
SMA	\$600	\$629	\$644	\$660	\$676

Source: TNDG

IV-F. CAPTURE RATE ANALYSIS

The PMA's capture rate of resident demand in the supermarket category (i.e., the portion of resident demand that could potentially be retained in within the area) is projected at 100%. The PMA is also expected to capture 2% of SMA demand for supermarket sales (see Table IV-6 below). Normally, a PMA would not expect to capture Food demand from outside its boundaries (since consumers typically purchase groceries in close proximity to their homes). However, the projected 2% capture of SMA demand reflects the synergies associated with the proposed Wal-Mart Supercenter. In particular, it is assumed that some SMA residents coming to make general merchandise purchases at the store will also make grocery purchases. This 2% capture rate of SMA Food demand is assumed to begin in 2009 – the anticipated opening date of the proposed expansion.

**Table IV-6:
Capture Rates of Primary and Secondary Market Area Demand
Foothill Ranch Trade Area**

Market Area	2007	2009	2010	2011	2012
PMA	100%	100%	100%	100%	100%
SMA	0%	2%	2%	2%	2%

Source: TNDG

IV-G. POTENTIAL SUPERMARKET SALES VOLUMES

Based on the capture rates shown above, For the PMA, the potential sales volumes are slightly higher than the existing sales estimates (shown in Table IV-5) because the PMA is projected to capture 100% of its resident demand in addition to 2% of the resident demand in the PMA. Conversely, for the SMA, the potential sales volumes are slightly lower than the existing sales estimates (shown in Table IV-5) because the PMA is projected to capture 2% of the SMA's resident demand.

**Table IV-7:
Potential Capture of Market Area Demand
Foothill Ranch Trade Area
In thousands of 2007 constant dollars**

Market Area	2007	2009	2010	2011	2012
PMA	\$153,326	\$164,691	\$166,302	\$167,931	\$169,578
SMA	\$409,770	\$421,082	\$431,188	\$441,536	\$452,133

Source: TNDG

IV-H. POTENTIAL SALES IMPACTS TO EXISTING SUPERMARKETS

Table IV-8 below provides the final estimates of sales impacts to existing supermarkets in the FRTA as a result of the Wal-Mart expansion.

**Table IV-8:
Potential Sales Impacts to Existing Supermarkets
Foothill Ranch Trade Area**

Market Area	2007	2009	2010	2011	2012
Projected Wal-Mart Sales (\$000s) (1)	N/A	\$29,330	\$29,330	\$29,330	\$29,330
<i>Remaining Sales, post Wal-Mart (\$000s) (2)</i>					
PMA	\$153,326	\$135,361	\$136,973	\$138,601	\$140,248
SMA	\$409,770	\$421,082	\$431,188	\$441,536	\$452,133
<i>Existing Store Sales Absorbed by Wal-Mart (\$000s) (3)</i>					
PMA	\$0	\$20,736	\$20,530	\$20,319	\$20,103
SMA	\$0	\$8,594	\$8,800	\$9,011	\$9,227
<i>Post Wal-Mart Sales per Sq. Ft., Existing Stores (4)</i>					
PMA	\$617	\$545	\$551	\$558	\$565
SMA	\$600	\$617	\$632	\$647	\$662

Source: TNDG

The sales impacts are derived as follows:

- 1. Projected Wal-Mart Sales (\$000s)** – derived by TNDG based on sales performance data from Progressive Grocer's *Super 50* publication.
- 2. Remaining Sales, post Wal-Mart (\$000s)** – equal to projected Wal-Mart grocery sales (#1) subtracted from projected captured demand (as show in Table IV-7).
- 3. Existing Store Sales Absorbed by Wal-Mart** – equal to remaining sales, post Wal-Mart (#2) subtracted from potential supermarket demand prior to Wal-Mart expansion (Table IV-5).
- 4. Post Wal-Mart Sales per Square Foot, Existing Stores** – equal to remaining sales, post Wal-Mart (#2) divided by existing square feet of supermarket space (Table IV-5).

IV-I. CUMULATIVE IMPACTS

Table IV-9 provides an estimate of the cumulative impacts to the market based on all known pending supermarket projects (including the proposed expansion evaluated in this analysis) in the FRTA. As shown in the table, there is one potential planned supermarket located at the intersection of Rockfield Boulevard and El Toro Road in the City of Lake Forest. Given that this potential supermarket store would be located directly on the PMA/SMA boundary, this analysis allocates 50% of the potential store's competitive space in the PMA and the remaining 50% in the SMA.

**Table IV-9:
Potential Sales Impacts to Existing Markets – Cumulative Analysis
Foothill Ranch Trade Area**

Market Area	2009	2010	2011	2012
<i>Remaining Sales, post Wal-Mart (\$000s)</i>				
PMA	\$135,361	\$136,973	\$138,601	\$140,248
SMA	\$421,082	\$431,188	\$441,536	\$452,133
<i>Existing Square Feet</i>				
PMA	248,445	248,445	248,445	248,445
SMA	682,703	682,703	682,703	682,703
<i>Planned Supermarket Sq. Ft.</i>				
PMA	17,000	0	0	0
SMA	17,000	0	0	0
<i>Existing + Planned Sq. Ft.</i>				
PMA	265,445	265,445	265,445	265,445
SMA	699,703	699,703	699,703	699,703
<i>Sales per Sq. Ft., Existing + Planned Supermarkets</i>				
PMA	\$510	\$516	\$522	\$528
SMA	\$602	\$616	\$631	\$646

Source: TNDG

**APPENDIX A:
DERIVATION OF GROCERY DEMAND FACTORS**

Table A-1, on page A-4, shows the steps used to derive the following factors in the grocery demand model: 1) percent of total food sales in supermarkets and 2) percent of household income spent on food sales (the italicized bold entries in the table). All of the taxable sales data for Orange County and the City of Lake Forest are provided by the BOE and are for the full year 2005.¹⁴

Row 1 – Taxable Food Sales are broken down by the share spent in Supermarkets vs. Other food stores, as reported by the BOE.¹⁵

Row 2 – Taxable Retail Sales are the total retail sales in 2005 in the two trade areas.

Row 3 – Food Sales Adjustment Factors are factors used to translate total taxable food sales (reported by the BOE) into total food sales. For example, in the case of supermarkets, it is estimated that taxable sales represent approximately 20% of total store sales. Thus, a factor of 5.0 is utilized to convert supermarket taxable sales into total supermarket sales. The sales conversion factors were derived by TNDG based on data provided by the BOE and selected grocery store chains.

Row 4 – Total Food Sales is estimated by multiplying taxable food sales (Row 1) by the food sales adjustment factors (Row 3).

Row 5 – Total Retail Sales is the sum of the total non-food retail sales (Row 1 subtracted from Row 2) and the estimated total food sales (Row 4).

Row 6 – Food Sales as % of Total is calculated by dividing the estimated total food sales (Row 4) by the total retail sales (Row 5). This percentage is broken down between supermarkets vs. other food stores in the two trade areas.

Row 7 – Supermarkets as % of Total Food is the percent of total food sales that are generated by supermarkets. This factor is calculated from taking the ratio of supermarket sales to total food sales (see Row 4). In estimating potential demand for supermarket sales in the trade area, we have used the countywide factor of 80.7%. It is appropriate to use this factor from the larger County geography, given that it is derived from a larger sample of stores. At the city level, this factor is based on a much smaller sample of stores, and reflects the unique mix of supermarkets and other food stores in that particular city. For example, any one individual city may have an unusually strong concentration of other food stores, which would skew the factor downward, given that a disproportionate share of total food purchases would likely be made at other food stores. However, the County level provides a large enough area so that we get a representative sample of supermarkets vs. other food stores.

Row 8 – 2005 Average Household Income provides the 2005 average household income of households in the two trade areas, as reported by Claritas.

Row 9 – 2005 Households provides the number of households in 2005 in the two trade areas, as reported by Claritas.

¹⁴ The most recent full year taxable sales data available for the City of Lake Forest and Orange County.

¹⁵ For the City of Lake Forest, these share factors were based on aggregate sales data for the five supermarkets in Lake Forest, which were provided by the BOE.

Row 10 – 2005 Aggregate Income is calculated by multiplying the 2005 average household income (Row 8) by the total number of households in 2005 (Row 9).

Row 11 – Food Sales as % of Aggregate Income is calculated by dividing total food sales (Row 4) by the 2005 aggregate income (Row 10). For estimating potential demand for supermarket sales in the trade area, we have used the Lake Forest factor of 8.0%. It is appropriate to use this factor from the City, given that it more accurately reflects the trade area's average household income characteristics.

**Table A-1
DERIVATION OF GROCERY DEMAND FACTORS
ORANGE COUNTY AND CITY OF LAKE FOREST**

<u>Row #</u>	<u>BOE Data for 2005</u>	<u>Orange County</u>	<u>Lake Forest</u>
(1)	Taxable Food Sales (000s)	\$1,716,228	\$51,875
	-- Supermarket Share @	65% \$1,108,321	53% \$27,647
	-- Other Food Store Share @	35% \$607,907	47% \$24,228
(2)	Taxable Retail Sales (000s)	\$37,672,834	\$885,136
(3)	Food Sales Adjustment Factors:		
	-- Supermarkets	5.00	5.00
	-- Other	2.18	2.86
	-- Total	4.00	4.00
(4)	Total Food Sales (000s)		
	-- Supermarkets	\$5,541,605	\$138,237
	-- Other	\$1,323,307	\$69,264
	-- Total	\$6,864,912	\$207,500
(5)	Total Retail Sales (000s)	\$42,821,518	\$1,040,761
(6)	Food Sales as % of Total		
	-- Supermarkets	12.9%	13.3%
	-- Other	3.1%	6.7%
	-- Total	16.0%	19.9%
(7)	Supermarkets as % of Total Food:	80.7%	66.6%
(8)	2005 Avg HH Income	\$87,797	\$92,760
(9)	2005 Households	972,116	19,866
(10)	2005 Aggregate Income (000s)	\$85,349,020	\$1,842,802
(11)	Food Sales as % of Aggregate Income:		
	-- Supermarkets	6.5%	7.5%
	-- Other	1.6%	3.8%
	-- Total	8.0%	11.3%

Source: California State Board of Equalization (BOE); Claritas; TNDG



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

February 24, 2009

Jocelyn Swain
City of Lancaster
44933 N. Fern Avenue
Lancaster, CA 93534

Subject: Lane Ranch Towne Center
SCH#: 2007061012

Dear Jocelyn Swain:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 23, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse



96-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007061012
Project Title Lane Ranch Towne Center
Lead Agency Lancaster, City of

Type EIR Draft EIR

Description The proposed project consists of a 407,000 square foot commercial development located on approximately 35 acres at the southeast corner of 60th Street West and Avenue L. As part of the proposed project, a General Plan Amendment (GPA 06-03) and a Zone Change (ZC 06-03) would be required in order to change the general plan designation from a mix of Commercial (C) and Office Professional (OP) to C and the zoning from a combination of commercial planned development (CPD) and OP to CPD. A Conditional Use Permit (CUP 06-03) would also be required for the proposed project. The commercial development would include two anchors, one with a garden center, for a total of 284,341 square feet, a 14,820 square foot drug store, three submajor stores totaling 35,000 square feet, 4 buildings with "shops" totaling 28,000 square feet, and two restaurants (both fast food and sit-down) totaling 10,300 square feet. Some parking would be provided on a 100 feet wide strip of property designated as R-7,000 in accordance with existing zoning code regulations. A total of 1,960 parking spaces are anticipated to be provided and access to the site would occur from Avenue L and 60th Street West.

Lead Agency Contact

Name Jocelyn Swain
Agency City of Lancaster
Phone (661) 723-6249 **Fax** (661) 723-5926
email jswain@cityoflancaster.org
Address 44933 N. Fern Avenue
City Lancaster **State** CA **Zip** 93534

Project Location

County Los Angeles
City Lancaster
Region
Lat / Long
Cross Streets 60th Street West and Avenue L
Parcel No. 3102-027-034, 35
Township 7N **Range** 13W **Section** 27,35 **Base** SBBM

96-2

Proximity to:

Highways
Airports
Railways
Waterways
Schools Quartz Hill HS
Land Use Z: Commercial Planned Development and OP
 GP: Commercial (C) and Office Professional (OP)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Solid Waste; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Native American Heritage Commission

Document Details Report
State Clearinghouse Data Base

Date Received 01/09/2009 *Start of Review* 01/09/2009 *End of Review* 02/23/2009



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

February 26, 2009

Jocelyn Swain
City of Lancaster
44933 N. Fern Avenue
Lancaster, CA 93534

Subject: Lane Ranch Towne Center
SCH#: 2007061012

Dear Jocelyn Swain:

The enclosed comment (s) on your Draft BIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on February 23, 2009. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2007061012) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

97-1



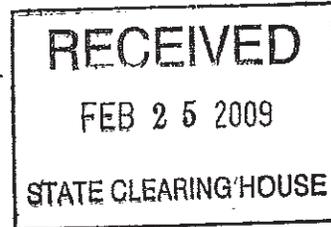
NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



February 10, 2009

Clear
2.23.09
late
e



Ms. Jocelyn Smith
CITY OF LANCASTER
44933 Fern Avenue
Lancaster, CA 93534

Re: SCH#2007061012: CEQA Notice of Completion ; draft Environmental Impact Report (DEIR) for the Lane Ranch Towne Center Project; located in the City of Lancaster, Los Angeles County, California

Dear Ms. Smith:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines. Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

97-2

√ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278) / http://www.ohp.parks.ca.gov. The record search will determine:

97-3

- If a part or the entire APE has been previously surveyed for cultural resources.
▪ If any known cultural resources have already been recorded in or adjacent to the APE.
▪ If the probability is low, moderate, or high that cultural resources are located in the APE.
▪ If a survey is required to determine whether previously unrecorded cultural resources are present.
√ 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.

97-4

- The final report containing site forms, site significance, and mitigation measurers 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.
▪ The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ The Native American Heritage Commission (NAHC) performed:

* A Sacred Lands File (SLF) search of the project 'area of potential effect (APE)': The results: No known Native American Cultural Resources were identified within one-half mile of the 'area of potential effect' (APE).. However the NAHC SLF is not exhaustive and local tribal contacts should be consulted from the attached list and the there are Native American cultural resources in close proximity..

97-5

- The NAHC advises the use of Native American Monitors, also, when professional archaeologists or the equivalent are employed by project proponents, in order to ensure proper identification and care given cultural resources that may be discovered. The NAHC, FURTHER, recommends that contact be made with Native American Contacts on the attached list to get their input on potential IMPACT of the project (APE) on cultural resources.. In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s) or Native American individuals or elders.

- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
▪ Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
▪ Again, a culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.

97-6



▪ Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

√ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

97-6

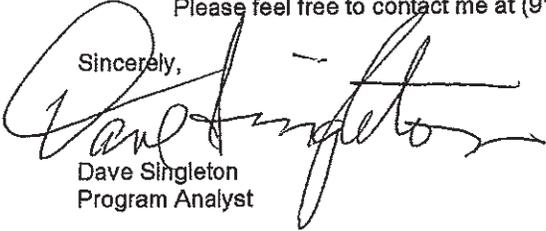
97-7

97-8

97-9

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



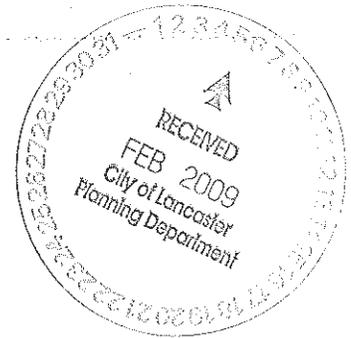
Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

DATE 2-2-09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:

JEFFREY & TAMARA SALO
6529 W. AVE L-4
LANCASTER, CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A1-1

I AM CONCERNED FOR A NUMBER OF REASONS:

A1-2

1: CRIME IN AREA DUE TO 24 HOUR OPERATION

2: SELLING CIGARETTES, ALCOHOL ETC ACROSS THE STREET FROM A HIGH SCHOOL

A1-3

3: TRAFFIC CONGESTION

A1-4

4: ALREADY ENOUGH "SUPER STORES" AND HOME IMPROVEMENT STORES

A1-5

IN THE AV.

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

DATE January 30, 2009

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM: Tamara Wiggins
1452 W Avenue H14
Lancaster Ca. 93534

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A2-1

We do not need anymore Super Centers
in the valley. Just how many Walmarts
do we need. The traffic at the High
School is already bad. The area is still
rural and it would be nice if it could
stay that way. The Antelope Valley was a great

A2-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

little town until greed made it a big town
with crime and Section 8.

Date 2/8/2009

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:
Jim Fields
5814 W. Columbia Way
Quartz Hill, CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A3-1

While great care was shown in assessing the impact to the cultural environment of the Native Americans who no longer occupy the Antelope Valley, which is appreciated and necessary, this EIR failed to analyze the impact to the "Native Americans" present today who are the ones that dwell daily at the High School located directly across the street.

A3-2

Quartz Hill High School is a historical resource as per the definition in Definition of Impacts. It is important for scientific, historical and religious reasons to cultures, communities, groups, or individuals and also is important in the traditions of a society.

Please see attached Addendum A.

Signature: *Jim Fields*

2/8/2009

Opposition to Draft EIR

Addendum A

5.2 Definition of Impacts states:

The CEQA requires consideration of project impacts on archeological or historical sites deemed to be historical resources. If the project will cause a substantial adverse change in the characteristics of a resource that convey its significance or justify or justify its eligibility for inclusion in the California Register, or a local register, either through demolition, destruction, relocation, alteration or other means, then the project is judged to have a significant effect on the environment according to the CEQA guidelines (Title 14, California Code of Regulations [CCR], Chapter 3).

Historical resources are places or objects that are important for scientific, historical and religious reasons to cultures, communities, groups, or individuals. Historical resources may include archeological sites, architectural remains, and other artifacts that provide evidence of past human activity. Historical resources can also include places of importance in the traditions of a society. To determine impacts to historical resources, it is necessary to assess the significance of resources and the effects of the project on their significance. The significance of resources in the project area is based on their importance to scientific-historic research, their importance to Native Americans, and their educational and community value for the general public.

Section 15064.5 of the CEQA guidelines pertains to the determination of the significance of impacts to archeological and historic resources. Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation.

Direct impacts may occur by:

- * Physically damaging, destroying, or altering all or part of the resource;
- * Altering characteristics of the surrounding environment that contribute to the resources significance;
- * Neglecting the resource to the extent that it deteriorates or is destroyed; or
- * The incidental discovery of cultural resources without proper notification.

A3-3



Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources. Due to their nature, indirect impacts are much harder to assess and quantify.

Facts about Quartz Hill High School:

Quartz Hill High School is a public, co-educational high school previously located in Quartz Hill, California. Founded in 1964, it is the third oldest comprehensive high school in the Antelope Valley Union High School District. Quartz Hill High School is consistently ranked as the top school in its district and one of the top schools in the state according to the Academic Performance Index. Quartz Hill High School is one of 65 high schools in California to offer the International Baccalaureate (IB) Diploma Program, which began at the school in 1998. Advanced Placement (AP) classes are also available in nearly all academic departments. Quartz Hill High School is the only school in the district to have a student receive a perfect score on the SATs.

The impact on the learning environment and the very rural country lifestyle that Quartz Hill High School enjoys has to be fully investigated and considered before any meaningful EIR can be produced.

I don't believe that Quartz Hill High can continue to thrive and succeed in the level of quality education described here with the distraction and terrible influences that this project would bring to the immediate neighborhood and that these influences could not help but spew onto the Quartz Hill High School campus.

Jim Fields
Quartz Hill Resident

Date 2/8/2009

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM: Tammany K. Fields
5814 W. Columbia Way
Quartz Hill, CA 93536
661-943-1199



City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A4-1

~~I don't agree with the traffic study and the impact it will have to the schools nor the homes around the proposed sites at 60th Street West and Avenue L, the Super Walmart and Target as well as several other buildings for retail and fast food. The proposed Walmart Supercenter would consist of all appurtenant structures and facilities and would offer general retail merchandise and groceries, including, alcohol for off-site consumption, pool chemicals, petroleum products, pesticides, and paint products. The proposed Walmart Supercenter store may include a pharmacy, a vision care center, a food service center, a photo studio, a photo finishing center, a banking center, an arcade, a garden center, outdoor sale facilities, outside container storage facilities, and roof top proprietary satellite communication facilities, and is proposed to operate 24 hours per day all bringing high traffic, congestion, noise and blight.~~

A4-2

Signature: Tammany K. Fields

DATE: 2-09-09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:

Bob Lea

14582 W. L-10

Quartz Hill

Ca. 935-36 (661) 943-5182

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A5-1

My concerns about your commercial re-zoning in your EIR report at 60th Street W and Ave. K Lancaster. According to the 2005 water management plan for the A. U. we have enough water supplies to meet increasing demands on new projects through 2030, that report is out of date and should be reevaluated, under the current zoning & plan 197 residential would create demands of 54,332 gallons per day, whereas the proposed project would demand

A5-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

36,785 gallons per day. And with the pumping curtailments in the Sacramento Delta, How can you say we have enough water for this project or any other?

DATE

2-8-09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:
Theresa Lea
4582 W. L-10
Quartz Hill, Ca 93536
661-943-5182

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A6-1

I have many concerns about these Superstores: Selling alcohol and tobacco so close to a school (school's) traffic is already horrible in those areas. water pressure is already a concern with all of the housing in the area, trash and pollution. I am of the opinion that most of these Superstores - Devistate communities as far as other commerce and they do not produce livable wage jobs.

A6-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

Stores like this not only create, but perpetuate a welfare state and the only people that benefit are the CEO'S and politicians!

DATE *February 9, 09*

TO:

Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org

FROM:

Natalie Armstrong
43507 Hampton St.
Lancaster, Ca 93536

City of Lancaster,

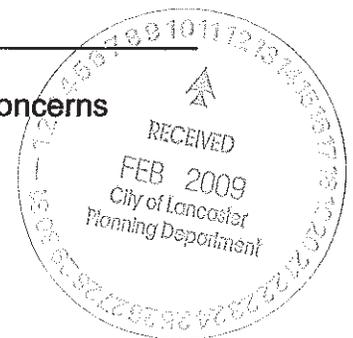
I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A7-1

This will be absolutely ~~h~~ heinous!

A7-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.



Date 2/12/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancafterca.org



FROM: Mr. Mrs. Reginald: Lorraine Alvarez
43003 Tilling Str.
Quartz Hill, Ca. 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A8-1

Series of horizontal lines for handwritten input.

Signature: Reginald Alvarez



DATE 2/11/09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:  Scott Francis
7319 Ridge View Dr.
Lancaster, CA 93536

Scott Francis

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A9-1

Quartz Hill is the Jewel of the Valley,
Known for its QUIET RURAL
Lifestyle. I live less than 1 mile from
the proposed sites of the Target & Walmart
and I LOVE the quietness of my neighborhood.
PLEASE DO NOT LET THIS GO THROUGH!

A9-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made

*Listen to your public. We dont want it.
For God's sake we have enough
Walmarts + Targets and we dont mind
the extra drive. Keep them out. PLEASE!!!*

DATE 2/14/09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:

ANN WRIGHT
43102 59th St. W
LANC. (QIZ. HILL), CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A10-1

It seems obvious to me the proximity to the high school of these projects is a potential disaster. The temptation for the students and the increase in traffic at an already difficult intersection should give one pause.

A10-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

*Not to mention the destruction of the beauty of the countryside.
Thank you
Ann Wright*

Date 2-15-09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM:

MICHAEL BEATTY
5235 W. L-6
QUARTZ HILL CA.

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A11-1

TRAFFIC AND POLLING CONCERNS ARE OF GREAT CONCERN.
I BELIEVE THAT THE PROPOSED BUSINESSES WILL BE A MAGNET FOR
HIGH SCHOOL STUDENTS TO HANG OUT, CAUSING SAFETY ISSUES NOT
ONLY IN THE STORES, BUT THE PARKING LOT AS WELL. JAY WALKING
ACROSS 60TH ST. WILL BE INCREASED SUBSTANTIALLY FROM PRESENT
LEVELS.

A11-2

STUDENTS WILL PROBABLY PARK CARS ON STORE PROPERTY, CAUSING
LIABILITY ISSUES.

A11-3

I HAVE SEVERAL FRIENDS WHO ARE IN BUSINESS IN Q.H., THESE
PROPOSED, LARGE STORES & CENTERS WILL PROBABLY KILL MOST OF THE
SMALL BUSINESSES ON 60TH ST. WEST., CAUSING ANOTHER BLIGHT IN
THE A.V.

A11-4

Signature: Michael R B

Date 2-16-09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancafterca.org



FROM:
Robert & Maria Barker
6311 Sandstone Ct.
Lancaster CA.

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A12-1

I am sending this with strong opposition to the proposed building of Target/Wal-Mart/Lowes etc. in our area. My wife and I moved from Lancaster to get away from this very thing. Our previous neighborhood was fine and then the building of Wal-Mart. Loitering, our neighborhood being used for a pass through crime went up. The Sheriff's can't handle what they have up here. How many Wal-Marts & Supercenters are needed in this valley! This is a perfect example of the city & its greedy ways trying to harm in at others expense. No matter if it ruins their living environment. When election time comes I know who I voted for. My votes will not be cast for those people again. The only people who benefit by these projects seems to be the Lane family & the city - Count my wife & I out - No Wal-Mart Target, Lowes in our area!

A12-2

Signature: Robert Barker
Robert Barker

Date 2/16/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org



FROM:

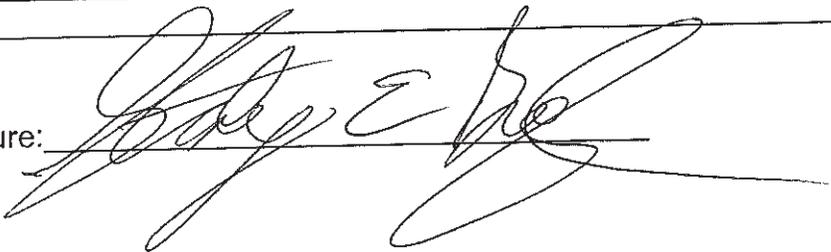
STANLEY BRUGH
PO BOX 843
LAKE HUGHES, CA 93532-0843

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A13-1

Series of horizontal lines for handwritten input.

Signature: 

Date 2/20/09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org

FROM: Marilee Bishop
43421 Bale Ct
Lancaster CA
93535

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A14-1

concerned about traffic.

A14-2

Signature: Marilee Bishop

Date 2/20/09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM: Erin Burks
45125 N 30th St E#35
Lancaster, Ca 93535

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A15-1

Why? Do we need another Walmart? I understand new jobs. We have enough of them.

By it don't you think people need help here? Why ~~don't you~~ take one of these BIG EMPTY Buildings & make a homeless center. The city is letting all them come to town. So help them out.

You could make a second hand Store in the buildings & make them help to earn their keep. The money can go to support the cost of the building.

A15-2

we
Think about the people!
What a concept!

Signature: Erin Burks

Date 2/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
 City of Lancaster
 Planning Department
 44933 Fern Avenue
 Lancaster, California 93534
 Phone: 661-723-6249
 Fax: 661-723-5926
 Email: jswain@cityoflancafterca.org



FROM:

Kevin Chandler
4854 West Ave L-4
Lancaster CA.
93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A16-1

LETS KEEP CURRENT LAND ZONING IN WEST LANCASTER AS IT WAS INTENDED! I Have Lived In This Lancaster/Quartz Hill Area For 35 Years, My Oldest Daughter IS A Former Student At Q.H.H.S. My Youngest Will Attend This School Soon, I Can't Imagine 1 Super Center, Next To A High School, Let Alone 2! The Traffic In This Area IS Absolutely Horrendous In This Area Of West Lancaster In The Morning And Afternoon. There IS Already A Shortage Of Parking At The High School And Pick-Ups/Drop-offs Of Students Are A Nightmare!

A16-2

No More Walmarts Please! We Have A Eastside And Westside Walmart Already, These Minimum Wage Super Centers Drag Down The Communities Around Them With Blight And Crime. We Need Industry And Technology Jobs That Pay A Living Wage. Please Don't Give In To "Big Box" Investors

A16-3

- Thank You

Signature: Kevin Chandler

Date 2-20-09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM:

Koki Cook
44836 N. Lancaster Ave
Lancaster, CA
93534

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A17-1

Series of horizontal lines for listing concerns.

Signature: Koki Cook

Date 2-20-09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM: JoAnn Correll
P.O. Box 2706
Lancaster, CA
93539

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A18-1

Series of horizontal lines for writing concerns.

Signature: JoAnn Correll

Date 02/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:

Misty Edwards
2206 West Ave M4
Palmdale Ca 93551

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A19-1

The increase in crime is a concern in this
community.

A19-2

Signature: Misty Edwards

Date 2/22/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org



FROM:

WILLIAM & NADINE FORD
42011 SUMMER LAKE
LANCASTER CA 93534-3787

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A20-1

- 1) INCREASE TRAFFIC - SURVEY WAS NOT MADE AT PEAK TRAFFIC HOURS
- 2) CRIME INCREASE - WE KNOW IT HAS HAPPENED BOTH AT VALLEY CENTER WAY AND EAST SIDE WALMART
- 3) WATER SHORTAGE - WE HAVE BEEN ASKED TO CUT OUR USE. THESE STORES WOULD MAKE SHORTAGE WORSE
- 4) DRAINAGE, RUNOFF AND SHADING - HASN'T GOTTEN ANY BETTER IN QUARTZ HILL AND THIS MANY STORES WILL INCREASE PROBLEMS
- 5) DECLINE OF QUARTZ HILL BUSINESSES, POSSIBLE CLOSURE OF EXISTING STORES AT QH PLAZA AND ALBERTSONS CENTER AT 50TH ST WEST & AVE N
- 6) AV HAS 4 WALMARTS - HOW MANY IS ENOUGH? WE ALREADY HAVE NUMEROUS EMPTY STORES IN THE AREA
- 7) HEALTH OF SCHOOL KIDS AND SAFETY
- 8) POLLUTION AIR, NOISE, TRASH LIGHTING

A20-2

A20-3

A20-4

A20-5

A20-6

A20-7

A20-8

A20-9

Signature: William Ford
Nadine Ford

DATE 2/23/09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:

Channa Gardner
42846 59th St W
Lancaster CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A21-1

See attached

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Ave L(NW and SE corners) and 60th Street W and Ave K (NW corner). I have read the Draft EIR(s)either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns for my community below. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A21-2

I live directly across the street from both of the shopping centers to be at 60th W and Ave L. We moved to this area to be away from the busy congested crime areas of Lancaster. Here are my concerns as well as many other residents:

1.INCREASE TRAFFIC in and around my neighborhood. There is a proposal to put a traffic light at the entrance of our housing track which will cross to the entrance of the shopping center. This will invite people to drive into our neighborhood trying to get out of the shopping center. The entrance to our neighborhood is also the exit. so people will be driving around trying to find a way out.We already have people driving fast through our residential neighborhood so this increases chances of accidents and our children playing to get hit by a car or kidnapped. Who is going to be responsible when any of these things happen?? What is going to be done to stop increase traffic?

A21-3

2.INCREASE CRIME in our area. Walmart is open 24 hors. What majority of people are up past midnight? CRIMINALS or people up to no good. This will increase vandalism, theft, rape, etc. Need I say more. Who is going to be responsible? Who is going to make sure we have enough law enforcement to handle these crimes? Better yet, Who is going to prevent them from happening in the first place.

A21-4

3.SAFETY OF OUR CHILDREN. We have a High School directly across the street. We have many kids that walk to and from school. We have many new drivers at the High School. This increases chances of kids being injured or even killed by an automobile. These kids are just learning how to drive and this increase their chances of having an accident. This also gives kidnappers and rapists more temptation and opportunities. Who is going to be responsible and what is going to be done to prevent this from happening?

A21-5

4.INCREASE TRASH. With more people comes more trash. People walking from the shopping center especially the teenagers that come from the High School across the street will drop their empty food containers or whatever else they don't want to carry after they buy from the stores or fast food places onto the streets. I don't want to clean up after other people. So how are you going to make sure our streets and neighborhood stay clean all the time like it is now?

A21-6

5.INCREASE PROPERTY TAXES. Are they going to increase? If so why should I pay for something I don't even want here? I can barely pay for my property taxes now. Times are hard.

A21-7

6.INCREASE NOISE. We live right off the streets at the corner of both shopping centers so we will have to listen to cars, loud music and loud people all night long. We don't have that now because there is nothing to do over here that late except watch High School Football Games, which we enjoy. We won't be able to keep our windows open on those clear warm nights. What is going to be done to reduce noise?

A21-8

Thank you for hearing my concerns and I will be waiting for your answers. Even though the best answer is NOT to approve this project. We have plenty of Walmarts and stores in Lancaster, which many are going out of business as it is. that brings up another issue of the many small businesses in Quartz Hill that will be affected and may go out of business.

A21-9

Channa Gardner
42846 59th St. W
Lancaster, CA. 93536

DATE 2/22/09

TO:
Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM: JEFF GARDNER
42846 59TH WEST
LANCASTER, CA. 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A22-1

1. ALL ROADS LEADING TO AND FROM ARE SINGLE LANE, TRAFFIC IS ALREADY BAD. HOW WILL THAT BE FIXED,

A22-2

2. THEIR WILL BE AN INCREASE IN CRIME. NEXT TO QUARTZ HILL HIGH SCHOOL, SUNDOWN, AND JOE WALKER. KIDS THAT WALK TO SCHOOL WILL BE IN MORE DANGER,

A22-3

3. FROM 60TH WEST AND AVE. L THEIR ARE ALREADY 4 WALMARTS WITHIN A 1 1/2 MILES TO MANY ALREADY.

A22-4

4. MOST OF THE RESIDENTS MOVED OUT HERE TO BE IN A SAFE ENVIRONMENT AWAY FROM THE BUSINESSES. I LIVE HERE FOR THE RURAL ATMOSPHERE.

A22-5

5. THEIR ALREADY IS A WATER SHORTAGE,

A22-6

6. RESIDENTS WILL NO LONGER BE ABLE TO ENJOY QUIET PEACEFUL NIGHTS,

A22-7

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

DATE

TO:
 Jocelyn Swain, Associate Planner, Environmental
 City of Lancaster
 Planning Department
 44933 Fern Avenue
 Lancaster, California 93534
 Phone 661 723-6249
 Fax 661 723-5926
 E-Mail: JSwain@CityofLancasterca.org



FROM: JEFF GARDNER
42846 59TH WEST
LANCASTER, CA. 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

1. ALL ROADS LEADING TO AND FROM ARE SINGLE LANE, TRAFFIC IS ALREADY BAD. HOW WILL THAT BE FIXED,

A23-1

A23-2

2. THEIR WILL BE AN INCREASE IN CRIME. NEXT TO QUARTZ HILL HIGH SCHOOL, SUNDOWN, AND JOE WALKER. KIDS THAT WALK TO SCHOOL WILL BE IN MORE DANGER,

A23-3

3. FROM 60TH WEST AND AVE. L THEIR ARE ALREADY 4 WALMARTS WITHIN 17 1/2 MILES. TO MANY ALREADY.

A23-4

4. MOST OF THE RESIDENTS MOVED OUT HERE TO BE IN A SAFE ENVIRONMENT AWAY FROM THE BUSINESSES. I LIVE HERE FOR THE RURAL ATMOSPHERE.

A23-5

5. THEIR ALREADY IS A WATER SHORTAGE,

A23-6

6. RESIDENTS WILL NO LONGER BE ABLE TO ENJOY QUIET PEACEFUL NIGHTS,

A23-7

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

DATE 23 Feb 09

TO:
 Jocelyn Swain, Associate Planner, Environmental
 City of Lancaster
 Planning Department
 44933 Fern Avenue
 Lancaster, California 93534
 Phone 661 723-6249
 Fax 661 723-5926
 E-Mail: JSwain@CityofLancasterca.org



FROM:

NEIDI GESIRJECH14355 Joshua Tree Dr.Elizabeth Lake, CA 93532661-810-3442

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A24-1

I am very concerned about the developments near Quartz Hill High School at 60th St. West of Avenue L. My daughter attends school there, and parents do not want large commercial developments directly across from the school creating more traffic hazards. Please leave Quartz Hill rural! We have plenty of Walmarks in the A.V., but we are losing our

A24-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

Rural areas. I don't mind driving to Palmdale or Lancaster to shop, do it all of the time. Please keep the streets and areas around Q.N.H.S. rural. Please do not change the zoning in this AREA. Thank you

Date 2-20-09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancastrca.org



FROM: Jamie Gilbreath
44159 Dahlia St
Lancaster CA 93535

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A25-1

too many already

A25-2

Signature: Jamie Gilbreath

Date 2/20/09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM:
SOFIA GONZALEZ
44427 PALM USTA AVE
LANCASTER, CA 93531

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A26-1

will be more traffic - Do not need
more stores built

A26-2

Signature: [Handwritten Signature]

Date 2/19/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:

Rachel Guzman
44263 Suncroft Ave
Lancaster CA 93535

661-609 0134

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A27-1

We have enough Wal-marts in the Antelope Valley
and empty buildings! I personally do not
want Lancaster & Palmdale to become like
the San Fernando Valley (Crowded)!!!

A27-2

Signature: Rachel Guzman

Date 2-20-09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancafterca.org



FROM:

Sharon Guzman
44263 Sancroft Ave
Lancaster CA 93535
661 609 0172

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A28-1

Series of horizontal lines for writing concerns.

Signature: *Sharon Guzman*

Date 2/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancastrca.org



FROM: Michelle Hart
6563 Lacombe Pl.
Lancaster CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A29-1

Series of horizontal lines for listing concerns.

Signature: Michelle Hart

Date 2/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:
JAMARA Moberly
43945 Fern Way
LANCASTER, CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A30-1

Series of horizontal lines for writing concerns.

Signature: Jamara Moberly

Date 2/20/09.



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM:
Erica Marrayo
262 E. Ave P2
Palmdale, CA 91355.

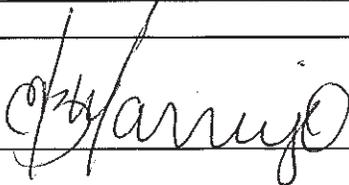
City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A31-1

too many Walmarts and empty stores in
the Antelope Valley.

A31-2

Signature: 

Date 2-20-09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM:
Joyce Roldan
5309 Sunburst Dr.
Palmdale CA. 93552

City of Lancaster,

I am writing this notice of refutation to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A33-1

PLEASE address TRAFFIC, INCREASED crime, water usage

A33-2

Signature: Joyce Roldan

Date 2.20.09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancastrca.org

FROM: Dallas Sanchez
4309 Sungate Dr.
Palmdale, CA 93551

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A34-1

Traffic will increase. Safety for students at nearby schools. We don't need another Walmart or Target, there are plenty around.

A34-2

Signature: 

Date 2/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:
Jamara SPEIGHT
43654 21st St. West
Lancaster, CA. 93534

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A35-1

Series of horizontal lines for listing concerns.

Signature: Jamara Speight

Date 12/17/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:

Bryan Thrasher
Ashley Ford
Jean & Andy Alcala
Dave & Karen Thrasher

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A36-1

WE feel that the Environmental impacts would be dramatic to these areas and I feel that it would effect the wild life population and have deadly consequences.

A36-2

Signature: [Handwritten Signature]

Date 2/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflanasterca.org



FROM:
Diana L. Wallied
P.O. Box 323
Lake Hughes Ca 93532

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A37-1

Traffic increase

Noise increase

Crime increase

Environmental issues (water, waste etc.)

A37-2

Signature: Diana L Wallied

Date 2/20/09

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org



FROM:
Susan Whitton
4526 W. Ave L-12
Quartz Hill, CA
93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A38-1

Too much traffic, crime, flooding in area.

A38-2

Signature: Susan Whitton

DATE

TO:

Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone 661 723-6249
Fax 661 723-5926
E-Mail: JSwain@CityofLancasterca.org



FROM:

David Wright
43102 59th St. W.
Quartz Hill, Ca. 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning for three projects at the locations of 60th Street W and Avenue L (NW and SE corners) and 60th Street W and Avenue K (NW corner). I have read the Draft EIR(s) either in its entirety or on a specific topic and disagree with some or all of its data collected. In response to the reports I have listed the concerns I have for my community below.. Further, I request that my concerns be addressed prior to a decision being made to approve of this re-zoning.

A39-1

Quartz Hill has long been the jewel of
the Antelope Valley. The land is open, the views
unobstructed, the pace calm and uncluttered.
These shopping centers will destroy our way of life.
We don't want them, and we don't NEED them! All
of these stores can be reached elsewhere in minutes.

A39-2

I intend to be present of the 18th of February 2009 and would like these concerns answered prior to any decisions being made.

Sincerely,
David Wright
Teacher, QHHS

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancafterca.org



FROM:

DEREK BOUNIDS
5613 West M-4
Quartz Hill CA
93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A40-1

1) Where is the impact of jobs lost. Do 40 stores and businesses closing, full time jobs with benefits and medical ins.

A40-2

2) Where is there any data about CAR VERSUS KIDS? Since there will be a lot of kids cutting across parking lots

A40-3

3) Noise? Your data shows the impact of increased car noise 1.8 d.B. BUT does not include delivery TRUCK noise which is claiming to be 71-75 db. at 50 feet?

A40-4

Signature: Derek Bounids

TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org



FROM:
SHARRON EBERHARDT
5601 WEST AVE M4
QUARTZ HILL, CA 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A41-1

TRAFFIC INCREASE - IS there a separate route for trucks? Or are they allowed on all streets. How can it be minimal impact with the increase of traffic needed to justify building stores that need sales levels way above current use.

A41-2

Impact on local SM BUSINESS - WHAT happens to support sm business?

A41-3

ROADS ACROSS FROM SCHOOL -

HOUSES BUILT IN SM. RETIREMENT COMMUNITY - impact on home values go way down. Everyone of us that bought in neighborhood for our way of living now have to sell.

A41-4

Signature: _____

Date 2-16-09



TO: Jocelyn Swain, Associate Planner, Environmental
City of Lancaster
Planning Department
44933 Fern Avenue
Lancaster, California 93534
Phone: 661-723-6249
Fax: 661-723-5926
Email: jswain@cityoflancasterca.org

FROM:
Raymund & Ginger Jacinto
43360 Hampton St.
Lancaster, CA. 93536

City of Lancaster,

I am writing this notice of refute to oppose the commercial re-zoning of three (3) projects at the locations of 60th Street West and Avenue L (NW and SE corners) and 60th Street West and Avenue K (NW corner). I have read the Draft Environmental Impact Report (s) either in its entirety or on a specific topic and I disagree with some or all of the data collected. In response to these reports I have listed my concerns below. Further, I request that my concerns be addressed prior to a decision being made to approve of the re-zoning in these areas.

A42-1

My family just moved in at the end of Summer 2008 here close to Ave. K & both St. W. in hopes to get away from crime and rude Section 8 family homes that disturbs the peace ~~but~~ literally changing the way we live. Eastside Lancaster is NOT a place for me to raise my kids anymore so that's why I made a drastic move to the far west of Lancaster. When I grew up I always thought that Quartz Hill area ~~was~~ was a great nice rural community where alot of upper middle class people lived. I want to keep it that way. If I see a Walmart in this part of town then I might as well move back to the Eastside of Lancaster. We already have 5 Walmarts! Why do we need another one when its only a few miles away.

A42-2

Signature: Raymund Jacinto

Name Robert H. Graham

Address 42010 67th. st. w.

apt. b. Quartz Hill Ca. 93536

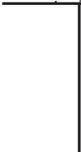
Date 1/30/2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.



B1-1

my personal comments Walmart is not wanted,



B1-2

Sincerely,

sign Robert H. Graham



Name Deborah Clark
Address 42822 52nd St West
Quartz Hill Ca 93536
Date 2-6-08

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

[Redacted]

B2-1

my personal comments To much traffic on L. I have
trouble all ready get out on to L.

[Redacted]

B2-2

Sincerely,

sign Deborah Clark



Form Letter B3

Name John and Lillie Molloy

Address 42429 55th Street West

Quartz Hill, CA 93536

Date 02/07/2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

B3-1

my personal comments This will impact the visual quality and neighborhood character, biological resources, historic resources, traffic and circulation.

B3-2

Also to include the water supply and drainage, air quality, neighboring properties, noise, light pollution and of course, public safety, among other things.

Sincerely,

sign

John Molloy
Lillie Molloy



Name ALBINO GARCIA

Address 43013 59TH ST. WEST

LANCASTER, CA 93536

Date 02-02-2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

B4-1

my personal comments

I moved away from Los Angeles up to Lancaster to get away from the city life. Now I find out you are going to build a Walmart directly across from where I live. If and when it happens, I will start planning my exit out of here.

B4-2

Sincerely,

sign

Albino Garcia





Name Ed & Sandy Bales

Address 42622 Roadrunner Way
Lancaster, CA 93536

Date 2-17-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

my personal comments this is a bad idea, I hope you find a better location.

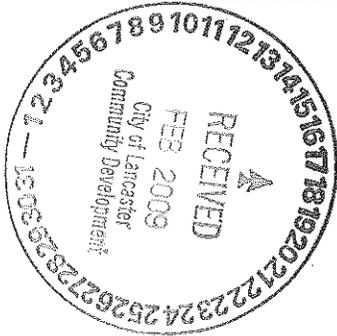
I truly believe that we have enough Walmart
and Target stores in this valley!

Sincerely,

sign Ed Bales Sandy Bales

B5-1

B5-2



Name April Burgis
Address 42635 Roadrunner Way
Lancaster, CA 93536
Date 2-17-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

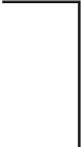
Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

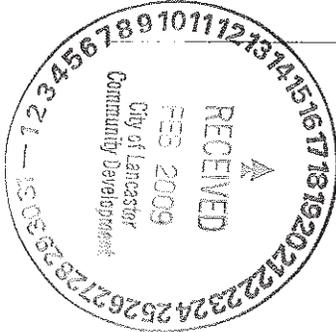
my personal comments _____

Sincerely,

sign April J. Burgis



B6-1



Name Gary Burgis
Address 42635 Roadrunner Way
Lancaster CA 93536
Date 2/17/09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

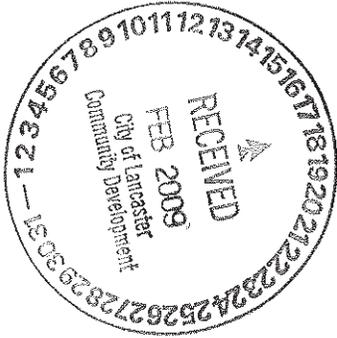
I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

B7-1

my personal comments _____

Sincerely,

sign



Name Dustin Foster
Address 42631 Roadrunner Way
Lancaster CA
Date 2-17-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

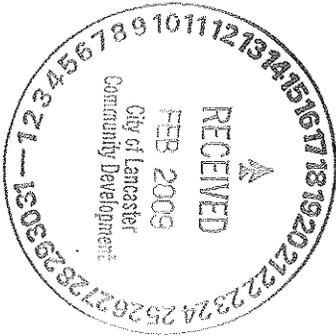
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B8-1

my personal comments _____

Sincerely,

sign Dustin Foster



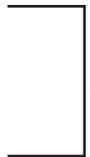
Name JUDY FOSTER
Address PO BOX 1326
LANCASTER, CA 93584
Date 2-17-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

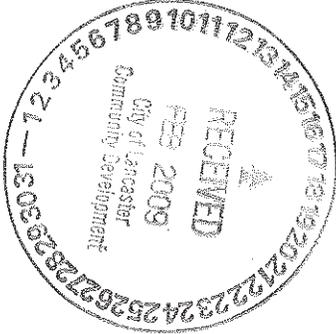


B9-1

my personal comments _____

Sincerely,

sign Judy Foster



Name Ron Foster
Address 42631 Roadrunner Way
Lancaster, CA
Date 18 Feb 09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

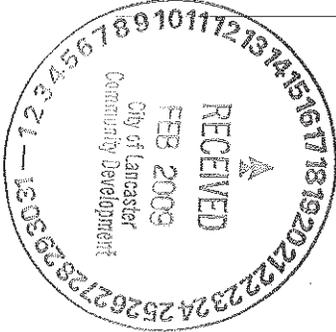
my personal comments No Water, Bad economy, Unemployed...

Sincerely,

sign *P. D. Swain*

B10-1

B10-2



Name FRANKLIN E. LEES

Address 43216 41ST ST. WEST
LANCASTER, CA 93536

Date FEB. 17, 2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

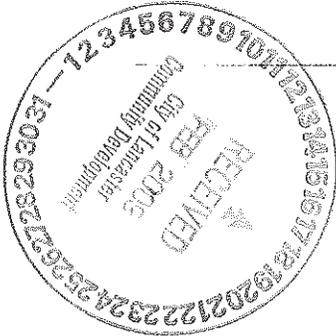
I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

my personal comments _____

Sincerely,

sign *Franklin E. Lees*

B11-1



Name DAVID W. PRATT

Address 42623 ROADRUNNER way
LANCASTER, CA 93536

Date 2/18/09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

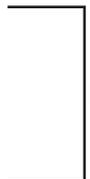
Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

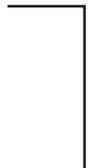
my personal comments THESE DEVELOPMENTS ARE
NOT NEEDED - WILL USE TOO MUCH
WATER

Sincerely,

sign David Pratt



B13-1



B13-2



Name Carol Toepfer
Address 2804 W. Dartmouth Dr.
Lancaster, Ca 93536
Date 2-9-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L.

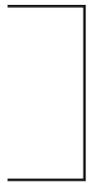
Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

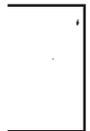
my personal comments Keep that area rural! We don't need another Wal-mart in the valley.

Sincerely, CAROL TOEPFER
Carol Toepfer

sign



B14-1



B14-2



Name DAWN WHITE

Address 3536 W. AVE. J-14
LANCASTER, CA.

Date 2-18-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

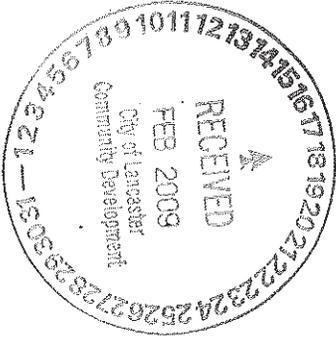
my personal comments The above paragraph says it all.
NOT next to a school. Very poor
planning.

B15-1

B15-2

Sincerely,

sign Dawn White



Name LESTER WHITE

Address 3536 W. AVE. J-14
LANCASTER, CA 93586

Date 2-17-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

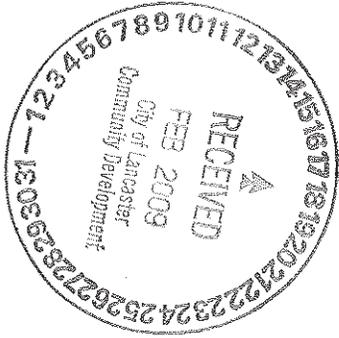
my personal comments 1 - WRONG PLACE TO DEVELOP SO NEAR TO A
SCHOOL AND ALREADY A HIGH TRAFFIC AREA. 2 - WE ALREADY
HAVE THREE WAL MARTS AND TARGET STORES IN EASY DRIVING
DISTANCE OF THE AREA. LEAVE THE AREA WITH ITS RURAL ATMOSPHERE.

Sincerely,

sign Lester J White

B16-1

B16-2



Name MARK White
Address 42656 Roadrunner Wy.
Lancaster CA 93534
Date 2-18-09.

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

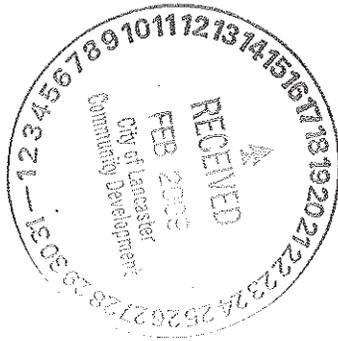


B17-1

my personal comments _____

Sincerely,

sign Mark White



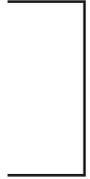
Name Mary White
Address 42656 Roadrunner Way
Lancaster CA. 93536
Date 2-18-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.



B18-1

my personal comments _____

Sincerely,

sign Mary White

Name Nicole Balok

Address 5819 w. Ave K13

Lancaster, CA 93536

Date 2-20-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

B19-1

my personal comments I recently relocated to Edwards AFB and after researching all of my options of where to buy a home and raise my family I choose Quartz Hill. Not just the schools but the small town feel and security my family has here along with the quiet nature sounds at night and the incredible views of the stars is just some of what the supercenters will take away.

B19-2

Sincerely,

sign

Nicole Balok

I will be forced to reconsider where I will raise my family if they are built.



Name Deborah Deskin

Address 42311 Camellia Drive

Quartz Hill, CA 93536

Date 02/19/2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

I am writing to oppose the Walmart and Target developments proposed for the northwest and southeast corner of 60th and Avenue L. The developments will seriously impact many of our family-owned Quartz Hill businesses; bring unwanted traffic and noise; provide alcohol, tobacco and weapons for sale directly in front of the Antelope Valley's best-rated public high school; serve as an ugly eyesore on the landscape; but most of all, the developments will destroy the quality of life and small town atmosphere that we have here.

B20-1

my personal comments Where did you get your statistics on the traffic at Ave L and 60th St West.

Please check your figures. Why doesn't the environmental impact study address where other hardware stores are in relation to the proposed hardware store in this area? Please have some research done on the potential for empty buildings due to inability to find businesses to lease these buildings?

B20-2

Sincerely,

sign *Deborah Deskin*



Name Virginia Orup
Address 42215 Runjelm Ave
Lancaster Calif 93536
Date 2-10-09

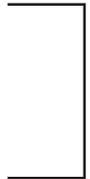
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Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L.

Dear Ms. Swain,

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B21-1

my personal comments No way. don't need at a school.



B21-2

Sincerely,

sign Virginia Orup



Name Sallie Keck
Address 43026 Lemerwood Dr.
Lancaster Ca 93536
Date Feb. 10 - 2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L.

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B22-1

my personal comments _____

Sincerely,

sign Sallie A. Keck



Name ANNETTE TRANE

Address S 819 WEST AVENUE K13
LANCASTER, CA. 93536

Date FEB. 19, 2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L

Dear Ms. Swain,

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B23-1

my personal comments WOULD BE TO MENTION THE POLLUTION FACTORS, WITH THE ADDITIONAL TRAFFIC, WE WILL LOOSE THE PLEASURE OF HAVING CLEAN, CLEAR, AIR TO BREATHE! THAT MAKES LIVING HERE SUCH A BLESSING. AND, THE THOUGHT OF LOOSING OUR BEAUTIFUL, HISTORICAL RANCH, WOULD BE AN UNFORGIVEABLE ACT!!

B23-2

Sincerely,

sign Annette Trane



Name MAURINE TERBORCH
Address 42007 BINGSTEN #54-B
LANCASTER, CA 93536-1201
Date 2-10-09

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fara Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L.

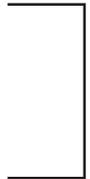
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my personal comments _____

Sincerely,

sign _____



B24-1



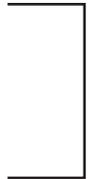
Name Grace Williams
Address 43355 Ringstem Ave
St 1 Lancaster Cal
Date Feb 10 2009

Attn: Jocelyn Swain, Assistant Planner - Environmental
Lancaster City Hall
44933 North Fern Avenue
Lancaster, CA 93534

Re: proposed developments at 60th West and L.

Dear Ms. Swain,

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B25-1

my personal comments _____

Sincerely,

sign Grace Williams



021809ts

CITY OF LANCASTER
PLANNING COMMISSION
PUBLIC HEARING

--oOo--

TRANSCRIPT OF PUBLIC HEARING)
HELD IN RE DRAFT ENVIRONMENTAL)
IMPACT REPORT - 60TH STREET WEST)
and AVENUE L PROJECT)
_____)



WEDNESDAY, FEBRUARY 18, 2009
LANCASTER, CALIFORNIA
5:00 P.M.

Reported by: Timothy Scott, CSR No. 8517

□

1 Transcript of Public Hearing in re Draft
2 Environmental Impact Report - 60th Street west and
3 Avenue L Project, at City of Lancaster Council Chambers,
4 44933 Fern Avenue, Lancaster, California, on Tuesday,
Page 1

021809ts

5 January 20, 2009, at 5:00 P.M., before Timothy Scott, a
6 Certified Shorthand Reporter for the State of
7 California, holding Certificate No. 8517.

8

9 PLANNING COMMISSION:

10

11 JAMES D. VOSE, Chairman (Absent)

12 SANDY SMITH, Vice Chair

13 LARRY BURKEY, Commissioner

14 JOHNATHON L. ERVIN, Commissioner

15 DANA E. HAYCOCK, Commissioner

16 DAN JACOBS, Commissioner

17 RAJ MALHI, Commissioner

18

19

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LANCASTER, CALIFORNIA

2

WEDNESDAY, FEBRUARY 18, 2009

3

6:51 P.M.

4

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PUBLIC HEARING IN RE

6

DRAFT ENVIRONMENTAL IMPACT REPORT

7

60TH STREET WEST AND AVENUE L PROJECT

Page 2

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11 CHAIRWOMAN SMITH: Good evening, everyone.
12 I would like to call this meeting to order. We
13 will start the evening with an invocation by Reverend
14 Donald Grant, Pastor of Christ Our Savior United
15 Methodist Church, and Pledge of Allegiance by
16 Commissioner Ervin.
17 Please join me.
18 (Pledge of Allegiance.)
19 CHAIRWOMAN SMITH: May we have a roll call,
20 please.
21 (Roll call.)
22 (Chairman James Vose absent.)
23 CHAIRWOMAN SMITH: Thank you.
24 Before our meeting begins this evening,
25 Commissioner Jacobs has asked to make a statement.

3

1 COMMISSIONER JACOBS: Thank you.
2 I would like to announce that, one, I am the
3 manager of the Antelope Valley Fairgrounds and an
4 employee of the State of California. And Wal-Mart has
5 been a sponsor at the fairgrounds for a number of years;
6 therefore, I have taken the following steps.
7 One, I have discussed this matter with the City
8 Attorney's Office; two, I have discussed this matter
9 with the Fair Political Practices Commission; and,
10 three, I have also discussed this matter with the

11 president of the board of directors of the Antelope
12 Valley Fair.

13 Based on these discussions, I have determined
14 that no conflict of interest exists in this matter, and
15 I believe there is no reason I cannot participate in
16 these proceedings fairly.

17 Thank you.

18 CHAIRWOMAN SMITH: Thank you, Commissioner.

19 At this time I would like to ask our planning
20 director, Brian Ludicke, to make comments on the purpose
21 of tonight's meeting.

22 PLANNING DIRECTOR LUDICKE: Thank you, Acting
23 Chairman Smith.

24 Just to reiterate, the purpose of tonight's
25 meeting is to allow people the opportunity to provide

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1 oral comments on the adequacy of the two draft
2 environmental impact reports that are currently out for
3 public review at the intersection of 60th Street West
4 and Avenue L. Those comments can also be submitted this
5 evening in writing if the applicant or the person
6 speaking wishes to do so.

7 The comment period for these draft EIRs
8 continues following this meeting. It closes on the 23rd
9 of February. So I would like to reiterate that anyone
10 who wants to submit comments in written form has until
11 the 23rd of February to do so.

12 I will once again, you know, caution you that
13 this is not a debate on the goodness or badness of the

14 projects involved. It is simply an opportunity for the
15 public to comment on whether they think the
16 environmental impact reports as currently drafted are
17 adequate.

18 And, certainly, Acting Chairman Smith, in your
19 capacity if you feel someone has strayed from that
20 purpose in their discussion, you have the right to ask
21 them to make that relevant to the environmental
22 document.

23 That's the only comment I have.

24 CHAIRWOMAN SMITH: Thank you.

25 At this time we will have public business from

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1 the floor. If an individual is unable to stay through
2 the entire meeting due to extenuating circumstances,
3 a total of ten minutes is provided at this time during
4 which input may be given regarding agenda items. Any
5 person who would like to address the planning commission
6 is requested to complete a speaker card for the
7 recording secretary. Speaker cards are available at the
8 rear of the council chambers. Individual speakers are
9 limited to one minute each.

10 Do we have any cards?

11 PLANNING DIRECTOR LUDICKE: We have had no one
12 request early -- early comment.

13 CHAIRWOMAN SMITH: Okay.

14 PLANNING DIRECTOR LUDICKE: We do have a number
15 of cards, however, for comment under the public
16 testimony portion.

17 CHAIRWOMAN SMITH: Thank you.
18 At this point the public testimony on the draft
19 environmental impact report, the draft EIR -- and I'm
20 probably going to repeating a few things that Director
21 Ludicke said. Excuse me.
22 This portion of the agenda allows members of
23 the public to submit oral or written comments on the
24 draft EIR. Comments must pertain directly to the
25 adequacy of the content of the draft EIR only. Any

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□

1 person who would like to address the planning
2 commission -- excuse me -- is requested to complete a
3 speaker card for the recording secretary. Individual
4 speakers are limited to three minutes each.

5 Please be aware that the public may submit
6 written comments on the draft EIR until the closed
7 public comment period, which is February 23rd, 2009.

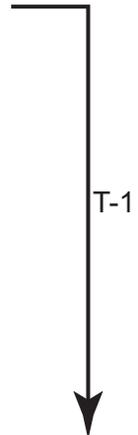
8 PLANNING DIRECTOR LUDICKE: Jocelyn Swain, who
9 is the associate planner environmental for the City will
10 read the names of the individuals that we have so far.

11 CHAIRWOMAN SMITH: Okay. Thank you.

12 ASSOCIATE PLANNER SWAIN: Neal Weisenberger.

13 MR. WEISENBERGER: My name is Neal
14 Weisenberger.

15 I teach at Antelope Valley College. I've been
16 a director of -- a past director of Antelope Valley
17 water. My wife has taught at Quartz Hill High School
18 for many years, and so I'm kind of familiar with that
19 area.



20 I need my glasses.
21 Let's see. As a long time resident I would
22 like to applaud the flood control mitigation measure
23 discussed in the environmental impact report for this
24 project. Avenue 60th and L intersection has always been
25 a real interesting process trying to get through there

7

1 on the rainy days with all of the water and all of the
2 flooding and all of the traffic that is going through
3 there. And with these last rainy days, I'm sure it has
4 really been great.

5 By requiring the installation of a 1300-foot,
6 60-inch storm drain, the project will significantly
7 improve flood protection for local residents and enhance
8 traffic and pedestrian safety during the periods of bad
9 weather.

10 I concur with the conclusion of the EIR that
11 the proposed 60th and L commercial projects will
12 actually provide local residents with better flood
13 control protection than would normally exist if the
14 property remained vacant.

15 I would like to commend the Commission, the
16 planning staff on a diligent effort on this issue.

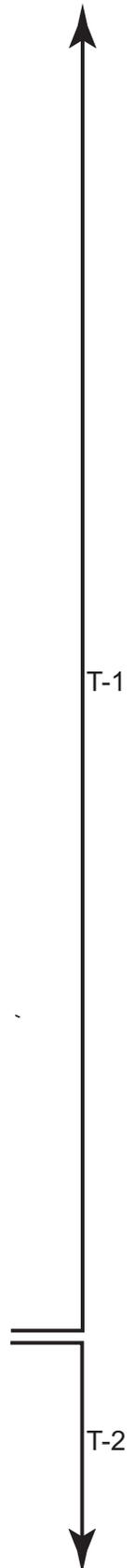
17 Thank you.

18 CHAIRWOMAN SMITH: Thank you.

19 ASSOCIATE PLANNER SWAIN: Newton Chelette.

20 MR. CHELETTE: Good evening. Thank you for the
21 opportunity to speak this evening.

22 As you said, my name is Newton Chelette, and
Page 7



23 I'm here to speak for Marvin Crisp and the A.V. Sheriffs
24 Booster Club. Marvin is the president and had a medical
25 emergency this afternoon. I am a member of the board of

8

1 directors of the Sheriffs Booster Club, and he asked me
2 to make this presentation on his behalf.

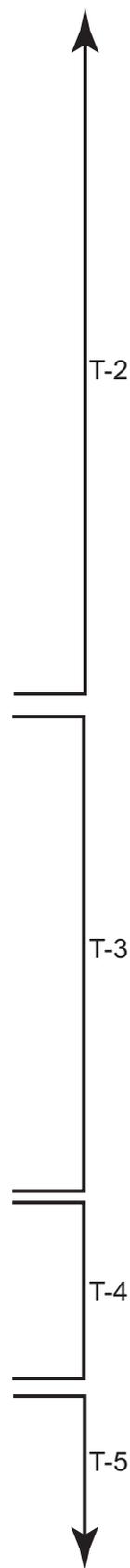
3 Marvin is in support of the environmental
4 impact report on the 60th and L Street project. As
5 president of the Lancaster Sheriff's Boosters, it is my
6 responsibility to advocate for the safety concerns of
7 Lancaster residents. That is why I'm here in support of
8 the EIR.

9 Specifically, I commend the traffic safety
10 mitigations contained in the EIR. The 60th and L
11 intersection is currently a traffic fatality time bomb
12 waiting to explode. There are no traffic controls.
13 Students park on the dirt, walk across the road, which
14 vehicles are traveling at high rates of speed.

15 By signaling the ingress and egress of Quartz
16 Hill High School and by widening streets to create turn
17 lanes, the EIR would dramatically improve safety for
18 both drivers and pedestrians.

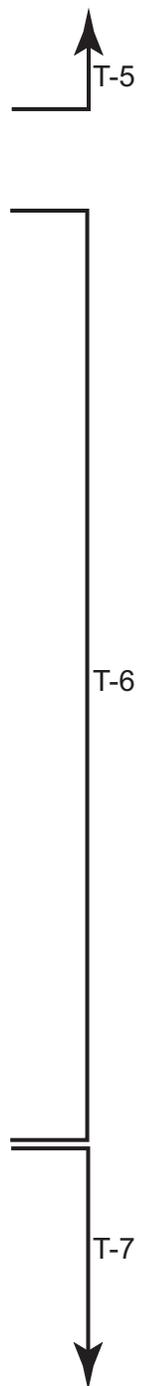
19 In addition, the project will generate millions
20 of dollars of new revenue for Lancaster, which will pay
21 for enhanced law enforcement and public safety services
22 that will benefit west side residents.

23 I believe that this EIR represents a positive
24 outcome for our entire community. I appreciate the hard
25 work that the commissioners and City staff have put into



□

1 this issue, and I'm proud to support the EIR.
 2 Thank you. Marvin Crisp.
 3 CHAIRWOMAN SMITH: Thank you.
 4 ASSOCIATE PLANNER SWAIN: Kevin Sanders.
 5 MR. SANDERS: Good evening, Commissioners.
 6 My name is Kevin Sanders, and I'm here to
 7 support the EIR. I live about a mile and a half from
 8 the intersection of 60th and L.
 9 I agree with the EIR's assessment that this
 10 project will actually result in fewer car trips and less
 11 pollution in our valley. Due to the lack of local
 12 shopping centers, west Lancaster residents have to drive
 13 a significant distance to shop or dine in Palmdale.
 14 Building a shopping center at 60th and L will enable the
 15 residents to shop in a local neighborhood and reduce
 16 their vehicle trips. Locating shopping facilities near
 17 residential communities is a cornerstone to smart
 18 growth.
 19 I commend the EIR for recognizing this
 20 important principle.
 21 Thank you for your time.
 22 CHAIRWOMAN SMITH: Thank you.
 23 ASSOCIATE PLANNER SWAIN: Geraldine Godde.
 24 MS. GODDE: Good evening.
 25 CHAIRWOMAN SMITH: Good evening.



□

1 MS. GODDE: I'm Geraldine Godde, born and
2 raised here. I live one half mile from this
3 development.

4 I look out across that property and I think,
5 what are we thinking? What are we thinking, people?
6 with a high school on the corner? No. Use a little bit
7 of common sense here and let's not build a Wal-Mart or a
8 Super Target. Okay?

9 Thank you.

10 CHAIRWOMAN SMITH: Thank you.

11 I would like to remind everyone that tonight's
12 comments are strictly regarding the draft environmental
13 impact report. We will have an opportunity a little --
14 in a few weeks or in a couple months to comment on the
15 project itself.

16 So thank you.

17 ASSOCIATE PLANNER SWAIN: Doug Burgis.

18 MR. BURGIS: Good evening, Commissioners.

19 My name is Doug Burgis. As announced, I'm the
20 president of the Quartz Hill Town Council.

21 And I want to say I can -- she was at our
22 meeting. I couldn't say her name.

23 Anyway, I have two grandsons in the high
24 school, elementary -- intermediate school. Each of them
25 have 4.0 averages, and they've been that way for the

11

1 last six years, and they are in seventh grade now. It
2 didn't come from Grandpa, trust me.

T-7

T-8

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3 Anyway, I'm writing this and presenting this
4 based on the EIRs under review for the properties of
5 60th and L and the commercial -- proposed commercial
6 projects on the corner. I am speaking on behalf of the
7 Quartz Hill Town Council regarding items that do not
8 appear to be addressed on the EIR. The best I can tell
9 these items weren't.

10 One very important item is that of the
11 proliferation of the fast foods directly across the
12 roadway from the Quartz Hill High School, and I'm
13 addressing that from the standpoint of the obesity
14 factor. The students will gravitate to these outlets at
15 any given opportunity -- off campus breaks, after
16 school, and even ditching school -- that's an old
17 Michigan term.

18 But, anyway, school boards throughout the
19 Antelope Valley have either removed or are in the
20 process of removing fast foods and sodas from the
21 schools. A concern is the obesity of children and young
22 adults, and research indicates that this is either
23 directly or indirectly the cause of many of our other
24 medical problems among growing children. And I have
25 looked at and am referencing about four pages of

12

1 reference stuff that I have turned in to you folks.

2 It is very disturbing that the various school
3 boards, public entities like yourself, the City Council,
4 tend to completely disregard this problem. The onus is
5 on all of us as city leaders, parents, grandparents to



□

6 protect and show guidance to our children. The issues
7 of our children's health and welfare must supersede any
8 monetary gain. And I say that because I don't think
9 there's any opposition to say we shouldn't have those
10 fast food vendors out there. And you know if they have
11 taken them off of the schools, where are those kids
12 going to go? Bingo.

13 Oooh, I'd better hurry up.

14 Another issue is also the health related as --
15 health related as to the effect of respiratory asthma
16 incidents on the children as it relates to the increased
17 closed proximity of vehicular traffic in regard to the
18 emissions, not to exclude road debris that has -- will
19 make airborne a great increase in the traffic flow.
20 I understand there are going to be 17,000 more cars per
21 day in that area. Students are constantly involved in
22 outdoor activities next to this purpose -- proposed
23 heavy grid of traffic and will be unnecessarily exposed
24 to its effects.

25 CHAIRWOMAN SMITH: Okay. Your three minutes

13

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1 are up. I do invite you, Mr. Burgis, to submit the rest
2 of the information in writing.

3 MR. BURGIS: I have a paragraph and a half.

4 That's about all.

5 CHAIRWOMAN SMITH: Go ahead. Go ahead and
6 finish your paragraph then.

7 MR. BURGIS: The opinions and concerns being
8 stated by this council should not be construed in any



9 way that we are against the commercial developments.
10 And I want that understood strongly.

11 Please don't put them next to our children's
12 schools. The zoning should remain residential. Move
13 the projects further west or north, away from the
14 schools. Lancaster --

15 You're going to love this one.

16 Lancaster, if you annexed our schools and
17 surrounding property, you have the assumed safeguarding
18 of our children. Again, the onus is on you to protect
19 our children and citizens.

20 CHAIRWOMAN SMITH: Thank you very much.

21 MR. BURGIS: Thank you.

22 CHAIRWOMAN SMITH: And again, we've had new
23 people come into the room, and we have some people who
24 are still waiting to speak. Tonight we are speaking
25 strictly on the draft environmental impact report and

14

□

1 not about the project itself. We are not going to be
2 making decisions tonight on any of this. We are here to
3 hear testimony on the environmental impact report, and
4 we'll be speaking more about the project in the coming
5 months.

6 So thank you.

7 ASSOCIATE PLANNER SWAIN: Lee Barron.

8 MR. BARRON: Good evening, Vice Chair Smith and
9 Commissioners.

10 My name is Lee Barron. I'm president of the
11 Quartz Hill Chamber of Commerce and the new owner of



12 Rancho Home Gifts. I am -- we are all opposed to this
13 project, both projects.

14 We have deep concerns over the water issue.
15 supposedly in District 10 there's enough water to
16 suffice 100,000 gallons per day usage through both these
17 developments, where in housing developments water is not
18 available. There's a conflict of interest there.

19 Also, the storm -- the water runoff that was
20 mentioned earlier, there is a 1300-foot drainage line
21 that will leach off into a holding bin that will not
22 hold all of the water that does generate from that
23 intersection. It also will flow as a backup up towards
24 avenue -- down 60th to Avenue K, where there supposedly
25 is an existing storm drain. That existing storm drain

15

□

1 does not come into effect until you get farther on down
2 the road. So there's not adequate runoff there.

3 The other thing is -- in the EIR report, there
4 is no mention on who's going to ensure the kids get
5 across the street safely. You know, I hate to see
6 one -- one of you have to go to the funeral of the first
7 kid that's hit. And this is very important that it is
8 addressed.

9 I don't understand how this got to this point,
10 how investors from outside this area that used to live
11 in this area can come in, buy land, sell it, and not
12 reinvest that money into our area. I'm off track.
13 sorry. I did want to say that.

14 My kids went to Quartz Hill High School. They



15 graduated with good honors. Two of them are in college
16 right now. Quartz Hill High School has the highest
17 level of students going on to schools -- further
18 education, I should say.

19 When you drive around L.A. and you see the
20 schools that are near commercial outlets, they have huge
21 walls. They are going through an education system that
22 is more like a prison. And our kids don't deserve that.
23 We have children that left Quartz Hill High School and
24 went on to Pensacola and Annapolis. How many schools do
25 we have up here that that happens?

16

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1 You know, we need to focus on education. We
2 need to focus on our rural environment that is out
3 there. This is west Lancaster. It is not Quartz Hill.
4 It is not Quartz Hill Commons.

5 As Doug mentioned earlier, you have a
6 responsibility of taking care of these kids.

7 CHAIRWOMAN SMITH: And I want to remind you,
8 tonight is to focus on the --

9 MR. BARRON: I understand.

10 CHAIRWOMAN SMITH: -- environmental impact
11 report. I appreciate it very much, Mr. Barron.

12 ASSOCIATE PLANNER SWAIN: Mike Roberts.

13 MR. ROBERTS: I just have a few items that I
14 dispute in the EIR.

15 First -- and these are quotes -- the project
16 would have less than significant impact with regard to
17 visual character, and it will have no visual impact.

T-16

T-17

18 It's a wal-Mart. What do you mean, no impact? no visual
19 impact? Maybe we are looking at different stores.

20 What else do we have? By the year 2010 they
21 project a 40 percent growth in housing. We might want
22 to rethink that with the current economic condition.
23 There is no 40 percent growth.

24 Okay. What else? It states in there that the
25 jobs created would result in a beneficial impact. What?

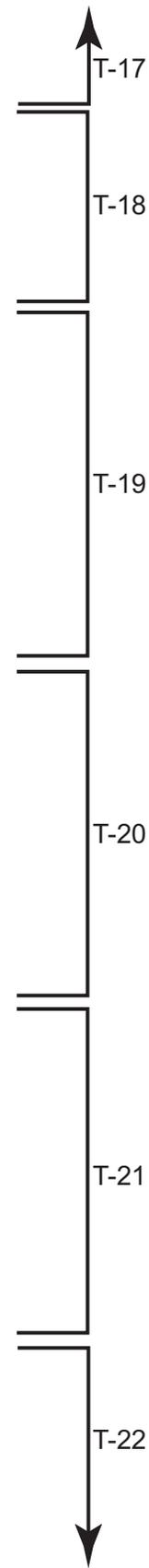
17

1 More minimum wage jobs a beneficial impact? They don't
2 spend money. These are kids making, what, \$7 an hour?

3 All right. What else do I have? They state in
4 there there is going to be an additional 11,000 homes
5 listed for housing impact. The EIR needs to be redrawn
6 with the current economic. 11,000 additional houses?
7 Most of them are in foreclosure -- that's wrong. There
8 is a lot of -- they aren't -- they are not building out
9 there anymore.

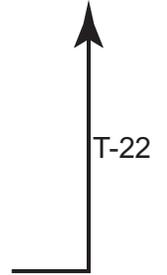
10 Now, let's see. Quote, there is an -- in the
11 EIR there is a need for increased parkland in Lancaster.
12 And this is what our proposal is? We're going to build
13 a wal-Mart when we need increased parkland? And it
14 states that in the EIR. The closest park on the west
15 side is Rawley Duntley, by the college. Why do we -- we
16 need parks out there. I'll let that one go.

17 Okay. Traffic. States in the EIR on the
18 way -- that this wal-Mart is on the way to and from
19 other destinations, and they will stop at the project as
20 part of another trip. People don't whip into wal-Mart



21 for their milk like an AM/PM, which is right up the
22 street. Wal-Mart is a destination. You actually plan
23 it. It's like a Costco. You're not going to stop in to
24 do your grocery shopping. You're going to go there
25 specifically for that reason.

18



1 Fifteen intersections will require signal
2 lights in the area.

3 And let's see. Last but not least, the traffic
4 count. The traffic count was taken on a Tuesday,
5 August 28th. Middle of summer, no school traffic,
6 Tuesday. It was also taken on a Saturday -- on a
7 Saturday, June 2nd. On a Saturday. How can they
8 justify or accurately count traffic when it's in the
9 middle of summer or it's a Saturday. They need to be
10 out there 7:00 o'clock in the morning in maybe October
11 and see what the traffic is.

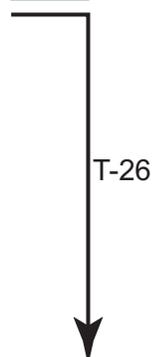
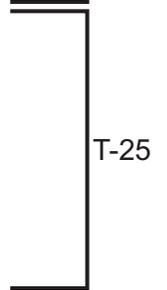
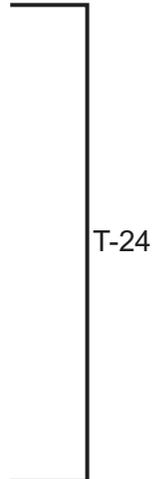
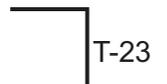
12 And last, but not least, it states in the EIR
13 the project will generate 17,000 daily trips. Seven --
14 that project will generate 17,000 daily trips, and
15 they're not even doing an accurate traffic count.
16 Imagine what it would be if they did an accurate one.

17 Thank you.

18 ASSOCIATE PLANNER SWAIN: Stephen Walden.

19 MR. WALDEN: Good evening, Madam Vice and
20 Commissioners. Thank you for the opportunity to speak
21 tonight.

22 My name is Stephen J. Walden, Master Sergeant
23 Retired, United States Air Force.



24 I'm up here tonight to oppose and refute the
25 draft EIR on the following conditions:

19

□

1 I have studied, I have researched and reviewed
2 your draft EIR. I have numerous questions and concerns
3 of possible errors and omissions in the analysis and the
4 data in this report. They are significant enough to
5 affect the conclusion in this report and possibly
6 influence the voting council. I'm going to go over just
7 a mere five or six and get out of your way this evening.

8 Number one, the high school impact. The effect
9 that it will have on these high school kids has been
10 mentioned numerous times this evening already, number
11 one being the fact that the children will migrate
12 towards these commercial zonings, head out to the fast
13 food restaurants, hang out in the stores, be around the
14 increased possibilities of crime.

15 The second, the traffic that was taken. It has
16 been mentioned twice already and I need not go into any
17 further. The traffic that -- we did an independent
18 research and study was on a Friday evening at 5:00 to
19 7:30 in the morning in which 1500-plus vehicles were
20 trafficking -- moved through the 60th Street and
21 Avenue L in a two-hour period.

22 If we do take this draft EIR, we're going into
23 it with speed analysis and skewed data. I request
24 greatly that you guys please reevaluate and do another
25 analysis on it.

20

□

T-26

T-27

1 The second is the water drainage problem has
2 been mentioned two or three times already this evening.
3 The 1300-foot drainage, 60-inch drainage pipe that is
4 planned to go in this -- into this to help with the
5 runoff is inadequate. It's going to go into a
6 termination point that can't handle the effects of the
7 increased water drainage problem.

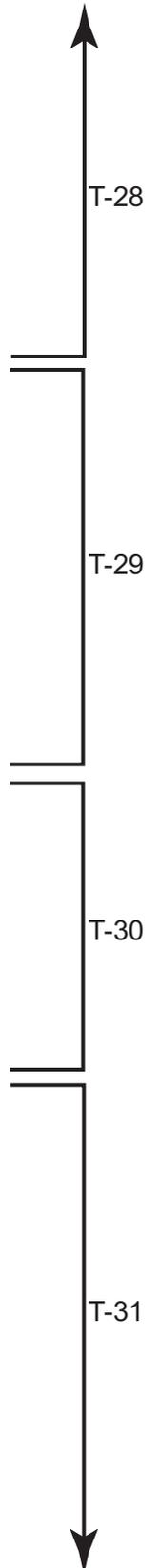
8 Something that hasn't been addressed this
9 evening is the environmental emissions that are going to
10 go in. Any time a commercial shopping center, any type
11 of commercial industry comes into an area that has no
12 industry whatsoever in it, the emissions are found to go
13 up. In the draft EIR it specifically states that there
14 will be no significant impact. I refute that and wish
15 to have this readdressed.

16 Next, the water usage. Currently this area of
17 Lancaster and Quartz Hill are told that they cannot put
18 residential homes in here because of the water issues,
19 and now we're asking to put in commercial -- commercial
20 areas in here that's actually going to increase the
21 amount of use of water at that time.

22 Finally, and my last point in the last ten
23 seconds that I have, is that it states that there is
24 going to be an increase in revenue. I'm sorry. But the
25 people in Lancaster and Palmdale are not going to give

21

1 you more money because you guys are moving out to
Page 19



2 60th Street West and Avenue L. They are just simply
3 going to move it from one side of the city to the other.

4 Thank you and have a good evening.

5 CHAIRWOMAN SMITH: Thank you.

6 ASSOCIATE PLANNER SWAIN: Michael Rosales.

7 MR. ROSALES: Good evening, Commissioners. My
8 name is Michael Rosales, and I am a resident of
9 Lancaster.

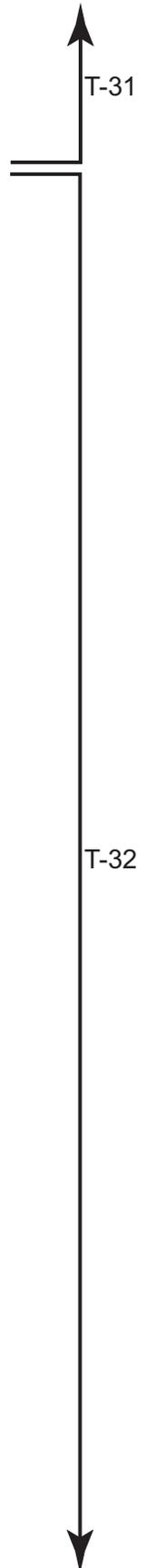
10 I don't live by the site where the Wal-Mart is
11 going to be built, but I am opposed to the building of
12 it, and I am going to address some of the issues. I do
13 live by the Super Center that is off of Valley Central
14 and Avenue J.

15 Public service, police. Lancaster station,
16 according to the EIR, is approximately six-and-a-half
17 miles from the site. Well, I live five miles from that
18 site, and the police station, the sheriffs station, is
19 about three to four miles from my house, which goes the
20 opposite direction.

21 One police officer for 833 citizens is
22 considered adequate to meet the current demand for
23 police service. Where do they come up with those
24 figures? And with the growth that this community is
25 enduring.

22

1 Talking about where -- that there would be very
2 little increase of crime to the potential site because
3 of the fact it's going to be a center. It doesn't
4 matter if it's a center or not. Crime -- anytime you



□

5 build an industry, any kind of sort of retail, it does
6 attract -- I'm sorry, but it does attract thieves, and
7 it does attract people that come in and steal and rob
8 from these places. And in the environmental impact
9 report it does not state -- it's not saying that it's
10 going to increase it by much. It will. I live by the
11 other one where we do experience that all the time.

12 Average response time for emergency calls in
13 the city of Lancaster for 2006 was 5.5 minutes. I'm
14 sorry to say, but we're in 2009. I think our city has
15 increased in that response time. It will probably be a
16 little bit longer, I think that needs to be reviewed by
17 the study.

18 we're building -- we're building this retail
19 property -- this retail monster or whatever people want
20 to call it. It's a retail store. It doesn't matter if
21 it's a -- what kind of retail store you put in there
22 across from the store, it will be seen serving alcohol.
23 It will have tobacco. They are claiming not to sell
24 firearms, but they will have ammunition there if they
25 choose to. These are things that the environmental

23

□

1 impact has to take into consideration for the young
2 people that do go to that school. It will attract them
3 to that place to hang out or even to have truancy; so it
4 will increase crime, and it will increase other
5 situations for that area.

6 Thank you.

7 CHAIRWOMAN SMITH: Thank you.



8 ASSOCIATE PLANNER SWAIN: Paul Harris.

9 MR. HARRIS: Good evening. My name is Paul
10 Harris, and I'm a 21-year resident of the Antelope
11 Valley. I'm a proud parent of three young adults that
12 graduated from Quartz Hill High School.

13 This has brought a lot of recognition to our
14 area. They say your children are your greatest
15 investment in life, and that's why I strongly oppose the
16 EIR draft. The major concerns regarding this draft are
17 the following:

18 Delineation of the market. Proposed is over
19 840,000 square feet of new retail space, which is well
20 beyond the normal range of 400,000 square feet. I ask
21 you, why?

22 It goes on to state the cannibalization by
23 anchor tenants will be coming to the super centers.
24 Wal-Mart, Lowe's, Target. This draft clearly states
25 that they have taken this into account. Thus, this will

24

0

1 eliminate sales at existing store locations in the
2 proximity. This will cause urban blight and affect our
3 environment.

4 Correction to the EIR. The draft EIR states
5 under the project description it is situated within the
6 community of Quartz Hill. This is not true. This is
7 Lancaster, California.

8 Other measured concerns. According to the
9 draft EIR, you will not burden existing capacity of
10 water. As previously stated by some of the other people



11 in this room, I believe the residents of Lancaster are
12 under a water rationing program. How can this be, I ask
13 you.

14 Long term effects: It will impact the
15 physical, esthetic, and the human environment that we
16 live in. This project definitely affects all three
17 categories. Physical, we will no longer have the views
18 within the area that I moved out here for.

19 Incremental degradation of local and regional
20 air quality. It states this in the EIR report. This is
21 irreversible. There will be pollution. All of this for
22 an estimated, as it shows in the EIR from the Quartz
23 Hill Commons project, \$1.2 million. I ask you, is it
24 worth 1.2 million annually to do this to our community?
25 I think not.

25

□

1 The draft EIR also states that there will be an
2 increase in traffic volume noise. We have to live with
3 this forever. What price justifies such an altering of
4 our environment for tax base revenues from the Super
5 Center Quartz Hill Commons in Quartz Hill.

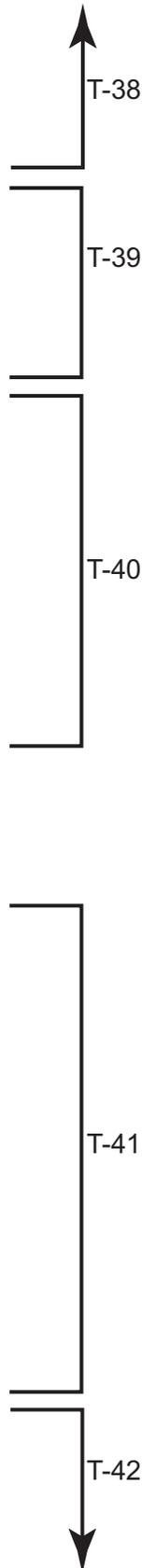
6 Based on this, I urge all planning commission
7 members here tonight not -- and to reject the need for
8 a zone change in the general plan amendment, and after
9 this the Lane Ranch proposal, too.

10 Thank you for your time.

11 ASSOCIATE PLANNER SWAIN: Loretta Berry.

12 MS. BERRY: Thanks for having us here.

13 I'm a 48-year resident of Lancaster, except for
Page 23



14 the time I spent in the United States Air Force. I
15 graduated from Quartz Hill High School, as well as my
16 kids did.

17 And first of all, I want to say that I feel
18 that 45 weeks would not be enough time to list all the
19 inadequacies in these two draft EIRs.

20 First of all, the economic blight was not
21 addressed at all. The City's economic plan for retail
22 needs is based on mass housing tracts that are not going
23 to be built, as was mentioned before. We are in an
24 economic decline. We are not building all of these
25 housing tracts that are on the city's housing tract map 26

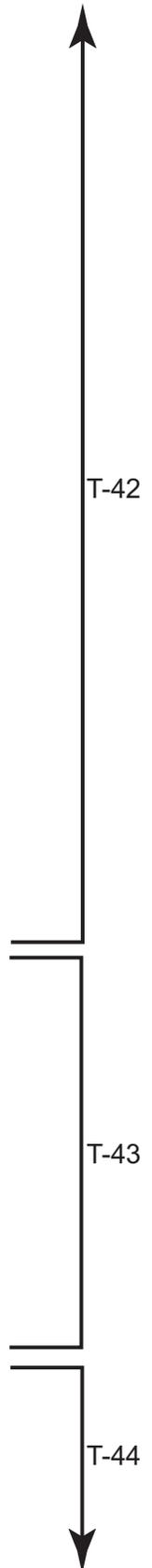
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1 that is about four feet by six feet big. This map shows
2 all the future houses, and this was done in the 1980s,
3 when there was a housing boom. Again, that's no longer
4 true.

5 The economic study is based on a false premise,
6 and it needs to be readdressed in the EIR, the
7 environmental impact report.

8 The economic blight in the valley is valley
9 wide. You can drive down any street in Lancaster and
10 see empty storefront after empty storefront after empty
11 storefront. I mean, I have got a list here. It's
12 ridiculous.

13 The City keeps building strip malls and
14 shopping centers, while ones that were built five years
15 ago, even three and two years ago stands empty.
16 Avenue P and 30th, six empty storefronts. The west side



17 of the valley cannot support two or three more,
18 including the Avenue K proposed center.

19 There are six empty storefronts in the Avenue P
20 and 30th west shopping center.

21 Avenue L and 45th Street West, there is two
22 empty storefronts.

23 Avenue L and 40th, two empty storefronts.

24 Avenue L and 30th, four empty storefronts alone
25 in the McDonald's strip mall that is there. That's not

27

□

1 including the empty ones that are in the Stater Brothers
2 shopping center right next door.

3 Avenue L and 20th west, there are four more
4 empty storefronts.

5 Avenue N and 50th Street West there are two
6 empty storefronts.

7 And as of late there have been six restaurants
8 that I know of, that I have read about in the Antelope
9 Valley Press that have closed and have gone out of
10 business, three near the Antelope Valley Mall, which is
11 supposed to be booming. I mean, that's where people are
12 supposed to go to shop, and stores are closing there.
13 Three of them were open -- have been open for less than
14 a year and are now closed.

15 Mervyn's closed. Gottschalks is closing one of
16 their stores. Circuit City left Lancaster a couple
17 years ago, and now they are closing in Palmdale. And
18 the list goes on and on.

19 Avenue J on the east -- 10th Street East and



T-44

20 Avenue J just closed an Albertsons and a Rite-Aid less
21 then one mile from the east Lancaster Super Wal-Mart.

22 Again, we cannot sustain these shopping centers
23 on the west side.

24 The \$1.2 million of new tax revenue was already
25 discussed. That's a fallacy. There will not be any new 28

□

1 tax revenue. It will be just redisbursed tax revenue
2 from the Wal-Marts -- the five Wal-Marts that the valley
3 already has. That was not addressed in the
4 Environmental Impact Report.

5 The traffic reports are inadequate, as
6 mentioned.

7 Child obesity was mentioned.

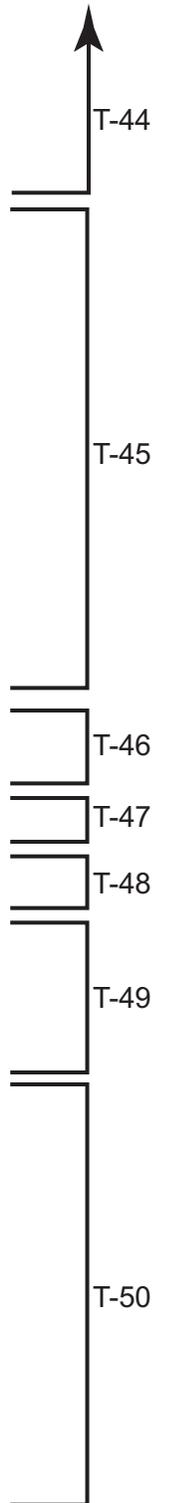
8 Health risks from emissions was mentioned.

9 It's not in the EIR that Quartz Hill High
10 school is a California state distinguished school, and
11 the impact on those students have not been addressed.

12 Someone mentioned about severe drought. I
13 brought with me half a dozen newspaper articles from the
14 last two weeks that says California is in a severe
15 drought. L.A. just announced yesterday that they are
16 going to face three water conservation rules. There is
17 no water. This is a desert. That was not addressed in
18 the -- it was addressed inadequately in the EIR report.

19 Thank you.

20 CHAIRWOMAN SMITH: Again, please keep in mind
21 that the comments should be strictly about the
22 environmental impact of this project.



23 ASSOCIATE PLANNER SWAIN: Bob Lea.

24 MR. LEA: Good evening. Thank you for the
25 opportunity to speak.

29

□

1 I have two subjects tonight I would like to
2 address.

3 One that was in the environmental report and
4 one that was omitted that should have been in there, in
5 my judgment. I am concerned about the commercial
6 rezoning of 60th Street and L and 60th and K. Is --
7 where is the water -- where is the water going to come
8 from? According to the 2005 water management plan for
9 the Antelope Valley, we have enough water supply to meet
10 consistent demands through 2030.

11 A lot of things have happened in the last four
12 years. I think we will all agree that the buildings
13 here in the valley that -- and I think that this report
14 is out of date and should be reevaluated.

15 Even if the report was true, then please tell
16 me why Sundown Elementary School at 60th Street West and
17 Avenue J is currently installing a water pump, not only
18 to handle the convenience of the children, you know, for
19 their plumbing and so forth and so on; they have no
20 water pressure. And if there's a fire, God forbid, I
21 would hate to have one of my kids out there.

22 And one of the residents in the homes on
23 90th Street West and J, they are already having a
24 significant water pressure problem. These people have
25 to get up at 4:00 o'clock, 5:00 o'clock in the morning

T-51

T-52

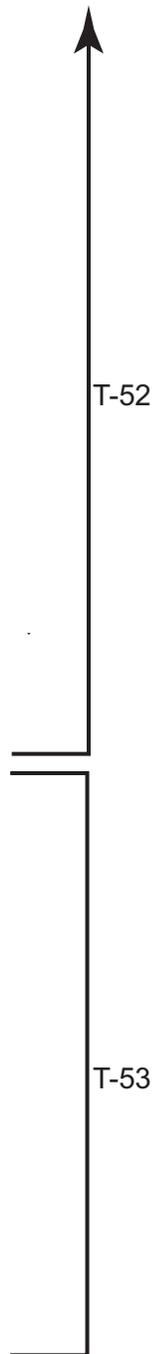
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1 just to take a shower before the guy down the street
2 does or before the sprinklers go off. That's
3 ridiculous. And in the event of a wildfire out in that
4 area or, God forbid, a fire in one of these -- these
5 residential areas that's packed so tight, we're going to
6 end up like that trailer park down below. It's going to
7 be devastating. Where is the water -- the water
8 pressure going to come from and the water for that?

9 The Antelope Valley is -- well, it's --
10 obviously we're in a drought right now, and the
11 residents are being required to conserve. I think as
12 long as this problem exists, there should be no
13 residential or commercial buildings at all in Antelope
14 Valley.

15 And one of the other subjects I would like to
16 hit on is -- that was not mentioned in the environmental
17 report was the jobs that I keep hearing about. I get
18 sick to hear about politicians talk about all these jobs
19 and stuff being created through the big-box stores and
20 the news media, while the truth be known, 90 percent of
21 those stores are part time -- part time, minimum wage.
22 Minimum wage, it doesn't take an intellectual giant to
23 figure the math on that. They are not going to buy no
24 homes; they are not going to buy goods and services in
25 our community.

□



1 And kids, where are they going to go when they
2 graduate? Great. We're going to leave them a Wal-Mart
3 or some other big-box store to go to work at? We are
4 going to lose all of our children out here. They are
5 going to be forced to leave. We are driving them out.
6 What are we doing to keep them here with higher pay,
7 better jobs, better communities? We're not. We're
8 doing nothing. We're collecting money and -- from these
9 big-box stores and so on and --

T-54

10 CHAIRWOMAN SMITH: I'm going to have to ask
11 that you close your comments at this time, and anything
12 else that you need to say, please submit them in
13 writing.

14 MR. LEA: Okay. Thank you for your time.

T-55

15 CHAIRWOMAN SMITH: Thank you very much.

16 ASSOCIATE PLANNER SWAIN: Jessica Burnias.

17 MS. BURNIAS: Good evening. Thank you very
18 much for giving me the time to speak with you today.

19 My name is Jessica Burnias, and I have been a
20 resident of Lancaster for approximately 20 years. I
21 graduated from Quartz Hill. I'm currently a children's
22 social worker with the Department of Children and Family
23 Services; so I work with our foster unit here and in the
24 city of Lancaster.

T-56

25 One of the things I wanted to address with you

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□

1 this evening is the omission of the EIR regarding
2 truancy and crime with the children that attend the

3 local school of the proposed commercial site. In the
4 sheriffs report for the last month -- the last six
5 months of 2008 we had 375 arrests by our truancy
6 officers of our local high school children that are
7 truant. And then this Sunday we just had something in
8 the newspaper of the importance of the revenue of the
9 attendance of our children in school for the school
10 district.

11 with all the budget cuts that we are having,
12 truancy was definitely an issue, and it was not
13 addressed. Me going to Quartz Hill High School, I knew
14 that if I tried to ditch, the only place that I could go
15 was Burger King, and there was a sheriff there that
16 would arrest everybody and give them tickets.

17 My brother currently attends Quartz Hill High
18 School, and his options are a little bit more broad as
19 to where he can go. My brother is going to be there
20 about three years, and if that Wal-Mart is there, I
21 mean, you just can't control something like that.

22 I work with our foster youth, and one of the
23 biggest problems that I have with the children that I
24 work with when they start hitting high school is those
25 truancy tickets that they are getting and the theft.

33

□

1 And when I talk to my kids, I can tell you from personal
2 experience where they steal from and where they hang out
3 at is Wal-Mart.

4 And the problem actually goes beyond that
5 because, you know, there was mention there's not going

6 to be firearms, but the tobacco and the alcohol, these
7 kids are stealing --

8 CHAIRWOMAN SMITH: Make sure you keep it on the
9 environmental impact.

10 MS. BURNIAS: But, I mean, you have got the
11 truancy issue. The truancy and the crime rate need to
12 be addressed, and it needs to be taken into
13 consideration.

14 CHAIRWOMAN SMITH: Okay. Just keep it -- okay.

15 MS. BURNIAS: Okay. And I definitely believe
16 that that's something that wasn't considered, and it
17 definitely needs to be taken into account. Me and my
18 husband just moved in. We just purchased a home a half
19 a mile from the -- and traffic. Traffic is another
20 issue that needs to be addressed.

21 You know, we've mentioned before, I went to
22 school. I remember getting into -- I got into two or
23 three car accidents going back and forth from school,
24 and it is something that is not being looked at when you
25 can -- once again, not just for our regular community

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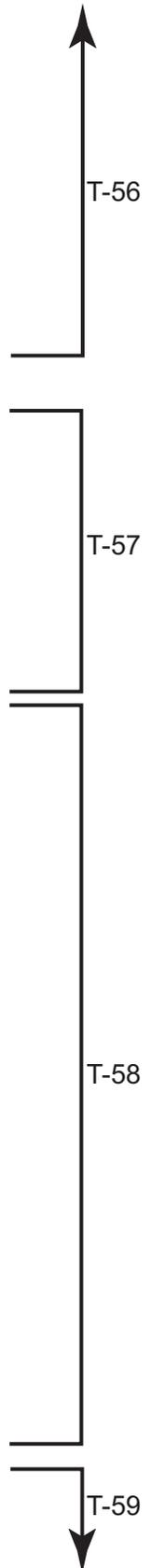
1 and, like, the people, but our children. And I can
2 speak from personal experience with the position I have
3 in our community.

4 So thank you very much for listening.

5 CHAIRWOMAN SMITH: Thank you.

6 UNIDENTIFIED AUDIENCE MEMBER: Arms and alcohol
7 are in it, by the way.

8 ASSOCIATE PLANNER SWAIN: Bob Curry.



9 MR. CURRY: Good evening.

10 I have reviewed all three of these
11 environmental impact reports and found a number of
12 deficiencies in all of them. I have submitted them by
13 writing, but I would like to focus just on the one that
14 I think is the most pervasive, and that is the lack of
15 supporting data for the urban decay conclusions.

16 And this state, of course, depends on their
17 outlook for population growth, the market demand for
18 these stores. And there's not much data in the report
19 about all of these topics except that you can see when
20 you look in the appendices that were supplied in the
21 studies, the one for Wal-Mart was dated October of 2008.
22 A lot of things have happened in the economy since then.

23 The Lane Ranch, the last data was October '07.

24 The one from Lowe's, the last data was in 2006.

25 And we've had the most severe change in the national

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□

1 economy in the last six months. These reports have no
2 indication of that in -- that they looked at that. So,
3 first, I might say, well, you can never predict the
4 future. You can never tell where the economic growth is
5 going, but that's not -- that's not a reasonable answer.
6 Any engineer could tell you that in a period of
7 uncertainty the proposer would need to come in and say,
8 "Sure, you can look at the rosy outlook that they have
9 right now, but you should also look at moderate growth,
10 slow growth. You should really look right now at severe
11 recession for several years, or depression."

12 And in those scenarios, the impact that you're
 13 going to see in this report is a whole lot different.
 14 You're going to see -- very likely you're going to see
 15 underutilized capacity; you're going to see abandoned
 16 buildings; you are going to see what few jobs we have in
 17 town are going to get passed around from one store to
 18 the next. There aren't going to be any new ones.
 19 You're going to see infrastructure that we're building
 20 up right now that we don't need, but we are going to
 21 have to pay for for years to come.

22 These are the real impacts, and they are just
 23 over -- overignored by every one of these reports
 24 because they are working on old data. And, see, you
 25 really can't possibly consider a rezoning position when

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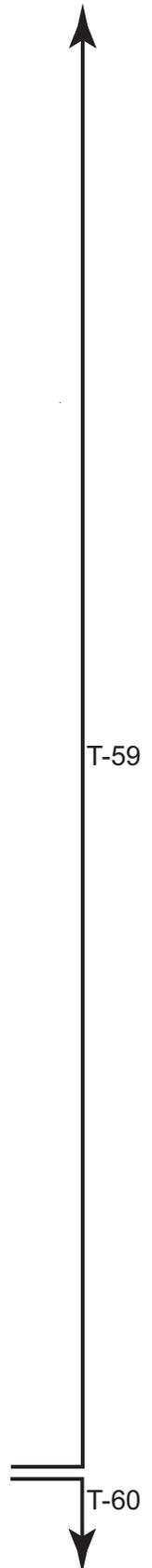
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1 you're looking at data that is out of date and
 2 irrelevant. You may as well be looking at population
 3 data for Peoria, Iowa, or something like that.

4 So all I would like to say, I think this is
 5 a severe deficiency, and all -- all of the environmental
 6 impact reports doesn't just affect urban decay. It
 7 really places into all of the arguments regarding
 8 traffic, waste, air quality, and I really encourage you
 9 to -- the only real solution to this would be for the
 10 EIRs to be rewritten by taking a serious look at a wide
 11 range of economic scenarios, not just the rosy picture
 12 they put in in the one that they presented.

13 Thank you.

14 ASSOCIATE PLANNER SWAIN: Richard Hecker.



15 CHAIRWOMAN SMITH: Good evening.

16 MR. HECKER: I want to thank you Commissioners
17 for allowing me the opportunity to speak.

18 My name is Richard Hecker. I'm with the
19 Quartz Hill Care Organization, and I actually brought my
20 copies of the environmental impact reports with me.

21 I realize that tonight's meeting is about these
22 draft reports, and I wanted to express that I find them
23 inadequate. They are very large, difficult to go
24 through. Loretta already mentioned that 45 weeks
25 probably would not be enough time to completely analyze

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1 them. And if you compare just these two reports with,
2 you know, the size of the report on the 60th and K
3 proposal, you see that the information is -- is just
4 amazing, and it's really difficult to go through.

5 So with that thought in mind, I'm not going to
6 run past my time this evening. I'm going to keep it
7 very brief, but I wanted to promise you I'm going to
8 write my concerns in a letter and submit the full length
9 of it because three minutes is just not adequate tonight
10 to address all these things.

11 As I stated, I believe these reports are
12 flawed. One of the things I wanted to mention, the
13 previous speaker talked about the rosy -- or the rosy
14 projections. One of the things I notice in this report
15 is it does not list the assumptions that were in hand
16 when these professionals drew their conclusions.

17 And without providing adequate data like that

18 or using old data, if they had flawed assumptions when
19 they had these discussions, there's no way their
20 conclusions can be valid.

21 One of the specific things in the report that I
22 just found appalling, myself, was on the comments at
23 Quartz Hill on Page 145, in talking about the issue of
24 fire stations, I wanted to actually read two sentences
25 for you.

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1 It said, "The fire department's current
2 facilities plan includes a future fire station in the
3 vicinity of Avenue K and 70th Street; however, the
4 station is not currently funded for construction."

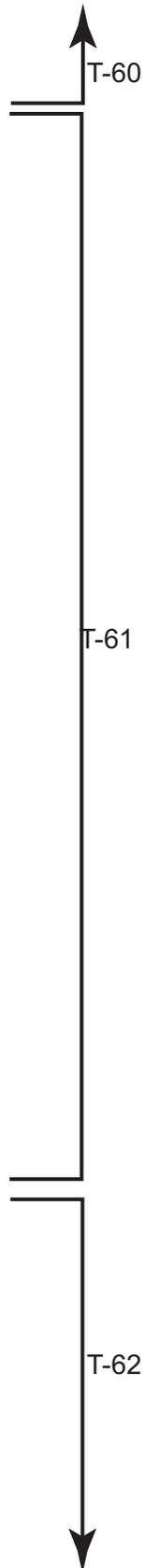
5 Second sentence, "Therefore, the project site's
6 proximity to its jurisdictional fire station is" -- and
7 I'll emphasize this word -- "inadequate and is
8 considered a potentially significant impact."

9 Here in the report it clearly says
10 "inadequate." I guess I am going to provide in writing
11 my full concerns, but I wanted to go on record and let
12 you guys know I believe this report is flawed, and I
13 would second the idea of starting from scratch.

14 ASSOCIATE PLANNER SWAIN: Brad Miccio.

15 MR. MICCIO: Good evening. Thanks a lot for
16 your time.

17 The gentleman before me touched on everything
18 I'm up here to touch on right now. That's -- that's the
19 one thing that jumped off the page at me is the issue of
20 fire safety. And just to add on to what he said, the



21 closest L.A. County Fire Department station is 1.8 miles
22 away, which does not meet their requirement for one mile
23 for an engine company.

24 And I'm a graduate of Palmdale High School, but
25 I can't wait for my girls to go to Quartz Hill High

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□

1 school because I live right down the street. And I
2 really oppose these EIRs.

3 Thanks a lot.

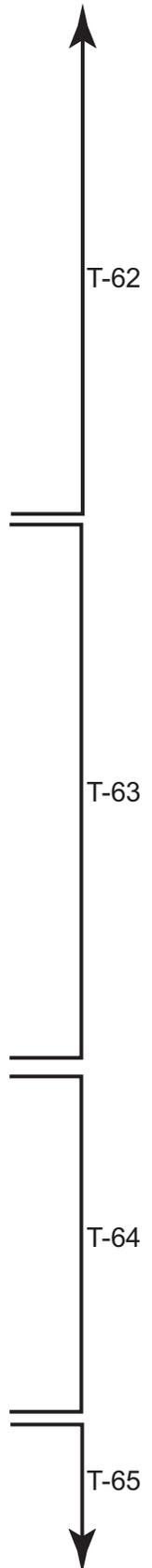
4 ASSOCIATE PLANNER SWAIN: Tammany Fields.

5 MS. FIELDS: Good evening. I live at 60th and
6 Columbia, and my children will, in essence, in the
7 future be going to Quartz Hill High School. They
8 presently go to Quartz Hill Elementary School; so they
9 do have their time to go there.

10 But I also refute many of the things in the
11 EIR, and especially the safety issues that I didn't see
12 in there, children riding their bicycles. Not just the
13 high schoolers, but the junior high schoolers that would
14 be traversing back and forth.

15 I don't agree with the fact that they did the
16 study in the summertime. In the last few days I have
17 sat and I have watched and I observed, because I do live
18 in such close proximity, the amount of cars that have
19 gone back and forth, back and forth, and at one point
20 I start counted in two hours 1582 cars. That is insane.
21 And what we're going to have is much, much more of that.

22 My concern is wal-Mart allows campers in their
23 parking lot. The EIR didn't discuss the safety of that



24 kind of issue. That could be potentially dangerous to
25 children, both junior high, high school, elementary.

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□

1 It's a great concern for children to be able to know
2 that they can go to and from the schools safely. It
3 wasn't there. I would likely have my children possibly
4 riding their bikes to school because of the close
5 proximity, but at this point there would be no way in
6 Helsinki that they would for the fear of them being hit
7 by cars, people not paying attention, which is a common
8 practice. You see the car accidents that we presently
9 have.

10 I know that the County, from what I understand,
11 is not willing to widen their section of the road, which
12 then we have a -- we have a meeting of the minds there
13 that probably won't become to agreement.

14 So I am asking you, based on the many other
15 people who have also seen inaccuracies and the economic
16 obsolescence that this will cause the community, not
17 just Quartz Hillians, but Lancasterans who go to
18 different businesses, who own businesses in Quartz Hill,
19 who make their living with their businesses, those
20 businesses would be decimated within two years.

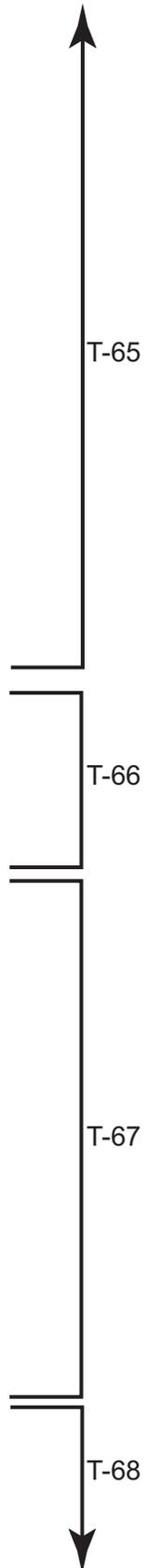
21 Please reconsider and think of everybody
22 concerned. It's not just Lancaster's revenue. It's the
23 people of Quartz Hill as well.

24 Thank you.

25 ASSOCIATE PLANNER SWAIN: Amelia Jennings.

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1 MS. JENNINGS: Good evening, Commissioners and
2 staff.

3 My name is Amelia Jennings. I'm a resident of
4 Lancaster. I live about one mile from this high school
5 where they're going to put these two shopping centers
6 across from the high school.

7 I very much oppose this. I think your EIRs
8 have a lot of things in it that are not adequate, but
9 I -- actually the EIR is -- kind of reminds me of the
10 stimulus package. So be it.

11 I have two big issues. The first one has been
12 touched upon already, and that is the water shortage.
13 This issue has been as -- has not been resolved in your
14 EIR or even discussed enough. We have already been cut
15 back on our water usage without more building in the
16 city. The -- we -- we just can't afford any more
17 building with the water shortage that we have.

18 The second issue I have is on the traffic
19 around the school. The traffic is going to be a danger
20 to all of our children there, but I think about this is
21 where our young drivers are coming out of daily and how
22 much danger they are going to be in. This also includes
23 the children that are walking as well as those that are
24 on their bicycles.

25 So please reconsider all of these things before 42

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2 this. It's just not good for our children to have all
3 this there.

4 Thank you very much and then have a great
5 evening.

6 ASSOCIATE PLANNER SWAIN: Paul Jennings.

7 MR. JENNINGS: Commissioners and staff, thank
8 you for this opportunity to address you on this
9 proposition, which I oppose. I have to admit that I
10 haven't had the opportunity to read through all of these
11 EIRs. They are just too much, too thick. I tried to do
12 other commitments that I have already previously
13 committed to. I wasn't able to obtain hard copies of
14 these; so I tried to get it on the Internet. That was a
15 useless exercise. I tried to get readable copies of
16 this EIR, draft EIR, on the Internet.

17 I do -- I did get access to the EIR for the
18 Avenue K and 60th project, and it has a lot of
19 similarities.

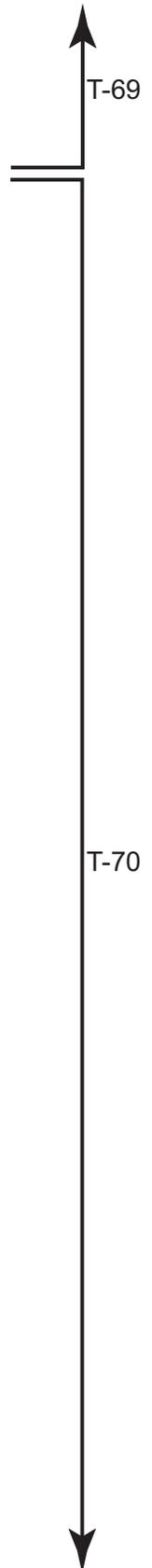
20 Looking at the summary of relative impacts,
21 which is Table 5.1 in that DEIR, the following
22 conclusions were classified as significant and
23 unavoidable even after the recommended mitigation
24 measures were implemented.

25 Table 3.3 concerns traffic. And all of these

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1 that I'm fixing to talk about are under this significant
2 and unavoidable category.

3 Traffic impact 3.3-1 talked about the
4 intersection traffic.



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5 Impact 3.3.2 talked about the roadway traffic
6 being inadequate.

7 Also, the -- there's another page, Page 3.5.15,
8 that said within a two-mile radius -- all of the plans
9 and pending projects within a two-mile radius of this
10 project would generate 89,000 daily traffic trips. I
11 find that really amazing.

12 The next item was noise. Impact 3.4.1 was
13 noise during the project construction. .2 was during
14 the project operation.

15 The next was air quality. That conflicted with
16 the implementation of the air quality plan generation
17 during construction of criteria air pollutants, air
18 pollution omissions project-related traffic, stationary
19 sources, and on-site sources.

20 And the last was visual quality due to the
21 heavy lighting on the project.

22 Since all of these problems affect the project
23 at Avenue K and 60th of a similar, significant, and
24 unavoidable manner, it's only reasonable to assume that
25 these same negative impacts would also apply to the

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1 projects that are on West Lancaster.

2 And I thank you very much.

3 CHAIRWOMAN SMITH: Thank you.

4 ASSOCIATE PLANNER SWAIN: Michael Lansing.

5 MR. LANSING: Good evening.

6 I'm going to talk about the draft environmental
7 impact report and truancy. Truancy is not addressed at
Page 40

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8 all in the draft environmental impact report, but it is
9 a concern that many specifically requested to be
10 included. Truancy will be a problem for both Joe Walker
11 Junior High School and Quartz Hill High School. Ask any
12 student, parent, or sheriff, all agree building fast
13 food and stores across the street from a school will
14 increase truancy. The center will become a center for
15 students attending sporting events and other activities
16 outside school hours, bringing loud music, smoking of
17 both kinds, drinking, fights, and spending -- speeding
18 to the residential neighborhood. Truancy will cost
19 parents time off work to attend court and money to pay
20 the truancy fines.

21 Truancy will decrease federal fundings. On
22 February 15th, 2009, the AP Press reported that students
23 attending a critical -- attendance is critical to the
24 district cash flow revenue. Schools are only paid when
25 a child attends. The westside School District has a

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1 daily average attendance rating 95 percent, while
2 Lancaster attendance rates are 92 percent. Each
3 percentage point translates into approximately 1 million
4 extra revenues for the district. That 3 percent
5 difference means \$3 million.

6 why is there a 3 percent difference? Are the
7 students in the city of Lancaster sicker or do they have
8 more places to go within walking distance?

9 Currently Quartz Hill High School and Joe
10 Walker Junior High School have only one commercial store

11 within walking distance, the AM/PM on the corner of L
12 and 60th. They will only allow a limited number of
13 students in the store at a time and none with backpacks,
14 to prevent shoplifting and other problems.

15 It doesn't take much to tempt some students
16 away from school. Placing two shopping centers directly
17 across the street will be too much to resist. No other
18 school in the Antelope Valley is surrounded by
19 supersized commercial centers.

20 Why has the draft environmental impact report
21 failed to include truancy in its investigation? The
22 school zone is not limited to only the school property.
23 Rezoning to commercial will have a major effect on the
24 school's environmental, and this should be addressed in
25 the environmental impact report.

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1 ASSOCIATE PLANNER SWAIN: Amber Goss.

2 MS. GOSS: Hi. My name is Amber Goss,
3 graduating class of 2003 for Quartz Hill High School.

4 I'm here to talk to you about the obesity that
5 was not -- the obesity issue that was not discussed in
6 your environmental impact report. The link between fast
7 food and obesity was not addressed in the environmental
8 draft impact report. It is a quality of life issue for
9 both students and parents. Surrounding the high school
10 and junior high with fast food will increase obesity.
11 Students will stop at fast food establishments on their
12 way to and from school.

13 Parents have worked hard to provide students

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14 with healthy snacks and lunches. Vending machines are
15 no longer stocked with junk food. But who has the
16 willpower to eat healthy when you smell greasy fast
17 food -- when the smell of greasy fast food reminds
18 you that it is that way.

19 Many students who are not allowed to leave
20 campus for lunch will sneak off and not bother to return
21 to school. It is just as hard to sneak back on campus
22 as it is to get off campus, being a person who has
23 experience with that, and I would stay off.

24 Students waiting for a ride and a chance to get
25 out of the weather and a place to meet with friends will 47

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1 hang out at a fast food place. The temptation will
2 always be there to eat just one more burger or cookie or
3 have three times more Coke or cappuccino.

4 The school zone is not limited to only school
5 property. School zone warning signs that reduce speed
6 limits are posted well beyond the school boundaries.
7 The schools nearby and across the street from the
8 proposed shopping centers are a major environmental
9 element in the neighborhood of Avenue L and 60th Street
10 West.

11 The job of the environmental impact report
12 needs to investigate all of the effects of rezoning
13 commercial into school zones will have on the students.

14 Thank you very much.

15 ASSOCIATE PLANNER SWAIN: Thank you.

16 Christina -- and I can't pronounce your last
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17 name.

18 CHAIRWOMAN SMITH: what is your last name?

19 MS. SEEPAN: Seepan.

20 CHAIRWOMAN SMITH: Thank you.

21 MS. SEEPAN: Thank you for hearing me.

22 I'm speaking of hopefully representing some of

23 the parents. I'm here. I'm a long-time resident.

24 Actually, I was born in Lancaster; so I have been here

25 for almost 33 years. I have lived in Lancaster,

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1 Palmdale, Mojave, California City, Big Bear -- you name

2 it, I have lived there.

3 And with the experience that I have had, I have

4 lived on the east side of Palmdale before the Target and

5 the Wal-Mart were built out there. And if you want to

6 only hear about the environmental issues, what higher

7 rate of pollution caused by emissions from the

8 commercial buildings and the traffic do you think my

9 daughter and I breathe in -- or did breathe in when we

10 were taking our walks and going to the park. Obviously

11 it's a higher rate.

12 I have spent a lot of time saving money in

13 order to go to the west side of Lancaster because

14 growing up here that was the place to be. And I have

15 just bought property out there, and to hear that, by

16 chance, you're going to develop out there is very

17 unheartening to me and I take it very personally because

18 I spent a long time getting to the spot I'm in right

19 now.

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20 And I take my family out to do the parkways and
21 the walks out on the west side of Lancaster now to get
22 away from the smog and to get away from the cars and to
23 get away from all of the pollution and the crime. And
24 this is why I oppose the development.

25 And I just have one question: If this happens, 49

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1 where am I supposed to go now? Where am I supposed to
2 take my daughter for a healthy walk on the street?

3 ASSOCIATE PLANNER SWAIN: Janelle Smith.

4 MS. SMITH: Thank you, Commissioners. I
5 appreciate the opportunity.

6 I did go through the draft EIR. And I'm not a
7 civil engineer, but my son is, and he pointed out a few
8 things.

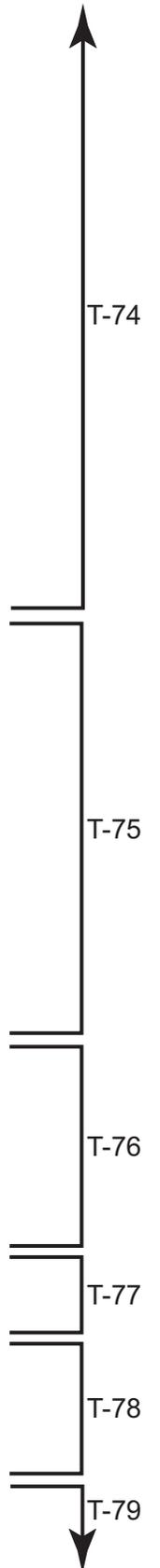
9 He said that the objective of 18.2 is to
10 encourage appropriate increment development. This is
11 not really increment development. Business is going out
12 on the edge of an area.

13 And along those lines, this will also take us
14 to 145 percent for the total proposed supply of retail
15 space by 2012, and that's if all of the current housing
16 projects go in, and they probably will not.

17 This also allows 1728 parking spaces. That's a
18 lot of trips.

19 I have three children that graduated from
20 Quartz Hill High, and that area has never been safe for
21 foot traffic.

22 Parking has always been an issue. I know



23 that's not wal-Mart's problem, but the kids are going to
24 park there, the parents are going to park there; the
25 kids will run across the street to be picked up. so

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□

1 that's a problem.

2 It's going to be the same amount of retail
3 jobs.

4 The future urban blight. When wal-Mart closes
5 stores, they just build new ones. Nothing ever gets
6 done with the old ones.

7 Forgive my voice, but this makes me nervous.

8 And it also states that it would present a
9 desirable image for the area. A 41-foot 600 wal-Mart
10 façade is not a desirable image.

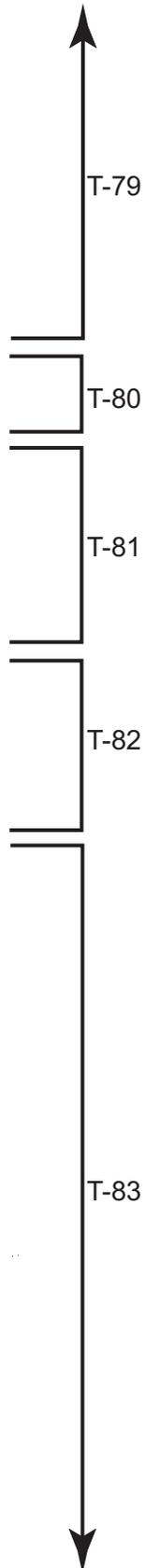
11 Thank you very much.

12 ASSOCIATE PLANNER SWAIN: Bruce MacPherson.

13 MR. MACPHERSON: Good evening. My name is
14 Bruce MacPherson. I'm a Lancaster resident, and I have
15 lived in the Antelope valley for over 31 years. I was
16 born here, went to high school here. I'm also a
17 licensed architect for the state of California.

18 There's many concerns with the EIR -- the draft
19 EIR, as has been mentioned already. I have three that I
20 think I can add a little bit to.

21 The first one is relative to the transportation
22 and traffic. The mitigation -- there's a number of
23 street widenings and traffic signals that are mitigation
24 measures they say they need to be put in, which is very
25 true. That's the case. However, the mitigation

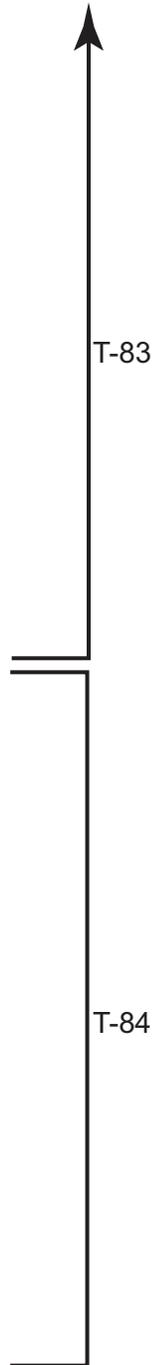


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1 measures say that the project document shall provide
 2 fair share contributions, which does not mean that the
 3 street widenings would go in or the traffic signals
 4 would go in prior to the occupancy of these stores,
 5 these developments.

6 I believe that each one of the proposed
 7 developments would require the improvements that are
 8 listed in the EIR. Those together demand that those
 9 mitigation measures be installed, the street widening --
 10 the street improvements be installed prior to occupancy
 11 of these developments. That's a flaw in the mitigation
 12 measures and the results of that.

13 The next item is under public service, police
 14 protection. We have recent experience in the city of
 15 Lancaster where shopping centers on the east side went
 16 in. Wal-Mart one of them, I believe. And they ended up
 17 requiring an extra police officer strictly funded by
 18 those stores to be provided for that area of the
 19 community. There is no reason why this development
 20 would not have the same type of requirement. As some of
 21 the other folks have mentioned tonight, the crime --
 22 incidents of crime will increase. The project should be
 23 required to fund a full-time extra police officer, a
 24 sheriffs officer, as well as a full-time truancy officer
 25 for the related problems there.



□

1 And then in the final area -- this strikes me
2 as an architect. The -- under land use compatibility,
3 the EIR -- draft EIR states the proposed structures are
4 compatible with the surrounding one to two store
5 residential and institutional buildings.

6 That is not the case. They would not be
7 compatible with the existing development or future
8 developments that are slated to go out there.

9 Quartz Hill High School is a -- is a low-scale, actually
10 rural high school. It's got a large gym building in the
11 rear; however, its massing is definitely on the low
12 scale. It builds up to a crescendo in the middle.

13 One- and two-story houses are definitely low
14 scale.

15 This type of building is a big box. And for it
16 to properly fit into the character, it would need to be
17 redesigned to have a smaller scale. Also a smaller
18 footprint be broken up into smaller buildings in order
19 to fit into the character of that area. That is a flaw
20 in the EIR.

21 Thank you.

22 ASSOCIATE PLANNER SWAIN: Karen Smeltzen.

23 MS. SMELTZEN: Hello. My name is Karen
24 Smeltzen, Major USAR retired and former member of GAVAR.

25 That's the National Association of Realtors in the

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1 Antelope Valley.

2 One of the things that -- I tried very

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3 desperately to get the EIR off the computer so I could
4 read it from cover to cover; however, it was very
5 difficult to even find it.

6 Plus, the amount of volume that was in there,
7 I really couldn't go through the whole thing. But I did
8 not see in there where they mentioned too much the
9 number of children that were going to be truant,
10 crossing the street by jaywalking. This is currently a
11 problem.

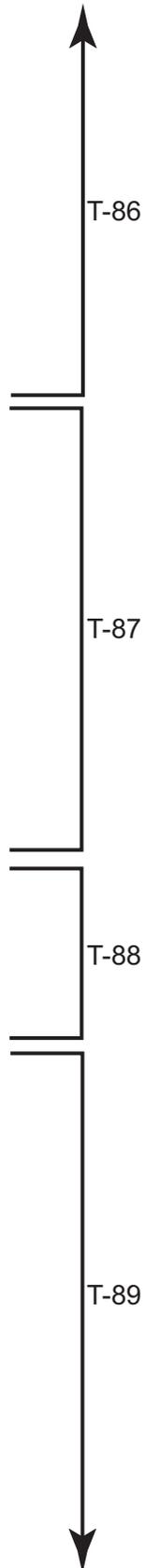
12 And they only mention the number of traffic
13 lights that would be required, but no mention that there
14 was going to be this constant traffic. Crossing in
15 front of cars and all times of the day, Wednesdays
16 especially, are a problem because they get out of
17 school. I believe I have seen children leave there as
18 early as 11:00 o'clock and constantly see children
19 truant in that area and wonder often why that's not more
20 addressed in the first place.

21 And having a Wal-Mart across from the high
22 school to me is a no-brainer. These kids are going to
23 be over there. Are we going to have a full-time truant
24 officer?

25 Quartz Hill High School is the school I should

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1 have attended. I grew up in Quartz Hill, for the most
2 part, and I lived at L-4. And my mother's house was
3 just recently sold when - and then she ended up dying,
4 but I know that area very well, and that whole street is
5 a flooding nightmare, and I don't think that has been



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6 addressed.

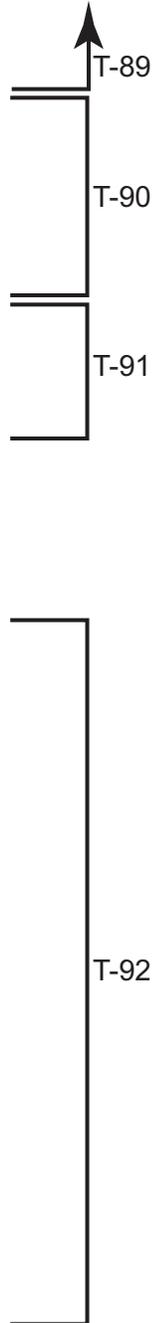
7 Is wal-Mart going to pick up the cost of
8 widening that street clear down to 40th? I somehow
9 doubt it. And that's really what it's going to take in
10 order to make that halfway safe.

11 Plus the fact that as a former member of GAVAR,
12 as a realtor I always suggested to people buying homes
13 in the area, that they go to check the zoning on a
14 property that was nearby, especially if it was vacant,
15 because it would affect the values of their homes.
16 There is no mention of that.

17 The home values have already taken a huge hit.
18 Those are all very expensive homes and that is not --
19 you know, putting a new Wal-Mart across the street is
20 certainly going to make them even more of a problem.

21 Plus the fact we have no water. I'm getting a
22 water evaluation next week from Quartz Hill Water
23 District because they are telling me I'm already using
24 too much. Where are we going to get it from? There
25 isn't any, folks.

55



1 Thank you.

2 CHAIRWOMAN SMITH: Thank you.

3 ASSOCIATE PLANNER SWAIN: Cleo Goss.

4 CHAIRWOMAN SMITH: Can I ask one question very
5 quickly before Ms. Goss comes up here? A couple of
6 people have mentioned that they are unable to download
7 the EIR on their computer.

8 Are there other ways to obtain that?

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9 ASSOCIATE PLANNER SWAIN: Anybody can call me
10 at the City and I do have CD copies that I have been
11 handing out and some people have come and gotten them,
12 or they can be mailed to them. It was all on the notice
13 that was sent out.

14 CHAIRWOMAN SMITH: Okay. Great. I appreciate
15 that because, again, for those of you who maybe have
16 just come here, we are talking strictly about the -- the
17 actual documents, what's good, what's maybe not so good.
18 strictly talking about the EIR, not about other -- other
19 parts of the project. You will have an opportunity in
20 weeks to come to discuss the project itself, but tonight
21 is the night that we are --

22 We are not making decisions. We are simply
23 giving you an opportunity at this special meeting to
24 give us feedback on -- strictly on the document. But
25 that's not to say that in the future you will not have a 56

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1 chance to talk about the truancy and -- and other --
2 other things that are on your mind regarding this
3 project.

4 So thank you.

5 UNIDENTIFIED AUDIENCE MEMBER: Can I just make
6 a comment?

7 I got a handout, and it said today was the day
8 to make comments about all that, about safety of kids
9 and --

10 CHAIRWOMAN SMITH: I don't -- I don't
11 believe -- and usually we don't conduct the meeting this

12 way, but I will comment to that that I do not believe
13 that that was something that the City sent out. That
14 may have been sent out from a special interest group.

15 I would -- if you look at the City Website and
16 look at the materials that the City has sent out and the
17 press releases that have been sent out by the City, it
18 did indicate that tonight was all about commenting on
19 the draft EIR, the effects of the environment.

20 But again, you will have the opportunity in the
21 future to -- to address all your other concerns. We're
22 not cutting it off here. Again, we are not making a
23 decision tonight. We are just talking about these
24 documents. So....

25 ASSOCIATE PLANNER SWAIN: If somebody didn't

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1 get a copy of the draft EIR on a CD and wants it, see
2 me -- see me afterwards and I will make sure that one is
3 mailed out to you or make other arrangements to get it
4 to you.

5 UNIDENTIFIED AUDIENCE MEMBER: Is there going
6 to be a chance to -- for questions?

7 CHAIRWOMAN SMITH: In the future -- in the
8 future, yes. And what we're asking is that you -- you
9 have spoken, but if you have other concerns, questions,
10 I would -- I would implore you to -- to write those
11 down, get those in by the 23rd so they can be included
12 when we --

13 UNIDENTIFIED AUDIENCE MEMBER: I mean, that
14 area shouldn't have even been in Lancaster. It was part

15 of L.A. County Quartz Hill until it was annexed by
16 Lancaster.

17 CHAIRWOMAN SMITH: Okay. Well, certainly you
18 will have your opportunity to talk about that in the
19 future, but we would like to -- we have a lot of people
20 who would like to speak. And I do note it's a very
21 controversial issue. I know it's very emotional. And
22 we do -- we do appreciate you coming out here and
23 talking about this document. We -- certainly we want to
24 keep the communication open.

25 And again, we're not --

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1 UNIDENTIFIED AUDIENCE MEMBER: The document did
2 not say this.

3 CHAIRWOMAN SMITH: Okay. But this is not --
4 this is not the place.

5 UNIDENTIFIED AUDIENCE MEMBER: If this is not
6 the chance --

7 CHAIRWOMAN SMITH: I'm sorry, ma'am. This is
8 not the place to speak from the audience.

9 UNIDENTIFIED AUDIENCE MEMBER: I wasn't aware
10 that it was only the EIR.

11 CHAIRWOMAN SMITH: Okay. I have stated that
12 several times, but let me say that we do not speak from
13 the audience. You had your opportunity to speak, and
14 I'm just trying to clarify that we are commenting on the
15 EIR.

16 So, Ms. Goss, I'm sorry to keep you waiting.
17 Please --

18 UNIDENTIFIED AUDIENCE MEMBER: I just had one
19 quick question: When do you make a decision on the EIR?

20 CHAIRWOMAN SMITH: That will be in the coming
21 weeks, but I do not have a date for you, sir.

22 UNIDENTIFIED AUDIENCE MEMBER: Will you have
23 public testimony before that or after?

24 CHAIRWOMAN SMITH: I am going to turn this over
25 to Mr. Ludicke.

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1 PLANNING DIRECTOR LUDICKE: The issue on the
2 projects themselves, there will be public hearings on
3 the project applications themselves. Those cannot be
4 conducted until the final EIR -- EIRs in this case are,
5 in fact, completed, which involves a response to all of
6 the comments that have been provided. Staff believes
7 that is going to be at least another two months.

8 CHAIRWOMAN SMITH: Thank you.

9 UNIDENTIFIED AUDIENCE MEMBER: Why was Wal-Mart
10 allowed to buy the property in the first place?

11 CHAIRWOMAN SMITH: I'm sorry, ma'am. I am
12 going to ask that you please refrain from giving your
13 comments or I will have you removed from the chambers.
14 So thank you. Please give respect to the next
15 speaker. I appreciate it.

16 MS. GOSS: Before I speak I would like to make
17 a comment on your comments about truancy and the
18 degradation of property values. Both of those are
19 issues totally ignored in the draft EIR. I read it.
20 It's not there.

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21 And I would like to ask Joycelin, what day do
22 we actually have to turn in our stuff? Is that on
23 Monday? Do we have until the end of close of business
24 or not?

25 ASSOCIATE PLANNER SWAIN: They need to be in by 60

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1 the close of business on the 23rd. If something is
2 postmarked by the 23rd, when it comes in I will accept
3 it.

4 MS. GOSS: Where can they turn it in?

5 ASSOCIATE PLANNER SWAIN: Just turn it in to
6 City Hall. Fax it in to City Hall. E-mail it to me.

7 MS. GOSS: I have had a number of people
8 telling me they have had difficulty e-mailing it to you.

9 ASSOCIATE PLANNER SWAIN: Did they put the "ca"
10 at the end of my e-mail address?

11 MS. GOSS: I don't know.

12 ASSOCIATE PLANNER SWAIN: That happens a lot of
13 times, the "ca" gets left off and it bounces back.

14 MS. GOSS: All right.

15 ASSOCIATE PLANNER SWAIN: So give them my phone
16 number, have them call me, and we'll figure it out.

17 MS. GOSS: Okay. All right.

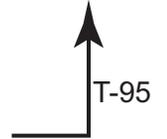
18 Addressing the draft EIR. The traffic data
19 used in the draft EIR does not represent true
20 conditions. Instead of using an automated collection
21 method, the data was collected manually. The National
22 Data Surveying Services Company that was used to collect
23 the traffic data doesn't even have a website. What kind

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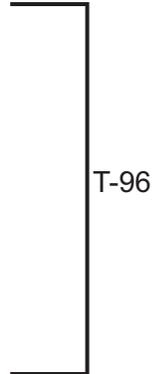
T-95

24 of data collection company is this? The kind that can't
25 even afford an automatic traffic counter.

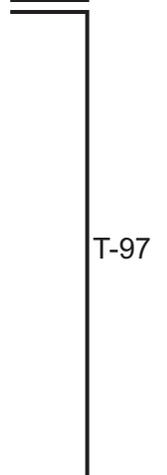
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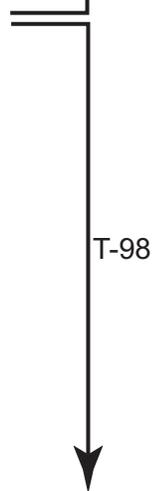
1 Data was only collected on five days for two
2 hours at a time, throwing away one of the hours from
3 each of the collection times. The days in which the
4 data was collected represents two minimum school days in
5 May during the Memorial week. Two days in August, just
6 after school started; and one Saturday, the day after
7 school was out. Okay?



8 The hours were also very carefully chosen. The
9 a.m. time only covers the last half hour before school
10 starts, missing much of the student drop-off traffic.
11 The p.m. hours doesn't even cover the student time.
12 They leave at 3:00. The hours were 4:00 to 6:00. It
13 doesn't even cover the residents who gets off at 5:00,
14 the majority of them, and it takes an hour to get home.
15 Traffic counts is gone. And they call that peak
16 traffic.



17 okay. Interestingly enough, the difference in
18 traffic counts between the a.m. and the p.m. supposed
19 peak hours, as in most cases, is less than 50 cars.
20 where are all these kids getting to school? Are they
21 flying?



22 okay. Remember, the school traffic time does
23 not include school being let out. An independent manual
24 count of the cars going in a single direction on
25 Avenue L and 60th identified hundreds of more cars than

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1 the draft EIR calls it.

2 This bad traffic data is then used again to
3 model noise and pollution. If the data is garbage going
4 in, it's going to be garbage coming out of the model.
5 Okay?

6 And there's problems with the noise
7 calculation. They use a model that's 20 years old. All
8 right?

9 And interestingly enough, the air pollution
10 quality data has an increase of cars versus the traffic.
11 So increased cars, you're going to have more air
12 pollution. Interestingly, how that works out, cars
13 disappear when you do air pollution -- or increase when
14 you do air pollution and they disappear when you go to
15 count traffic.

16 An automated traffic count of the true peak
17 hours needs to be taken before the final environmental
18 impact report so that the same major flaws will not be
19 represented in the final count and not passed on to the
20 air quality and the noise.

21 Thank you.

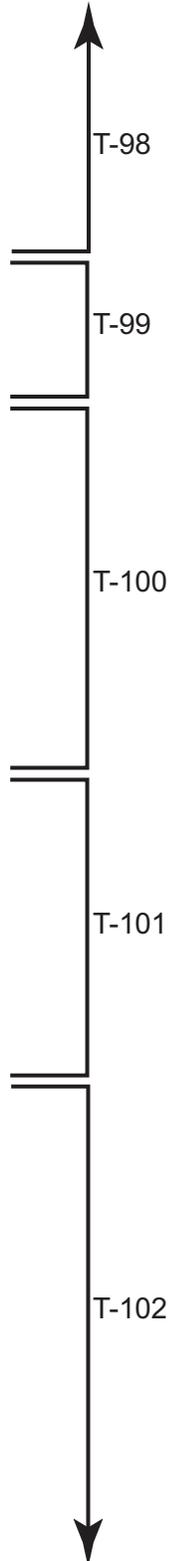
22 ASSOCIATE PLANNER SWAIN: Al Garcia.

23 MR. GARCIA: Good evening. My name is

24 Al Garcia.

25 And I'm like everybody else so far that -- from

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2 2008, and I moved directly across the street. I'm on
3 59th and K-12, which is going to be directly across the
4 street from where this project is coming in. The little
5 bit I got to read about the EIRs, I understand that K-12
6 is going to be extended. It's going to go directly into
7 the shopping center. And I'm just wondering how that
8 traffic coming into my community is -- has been talked
9 about or how it impacted and affected anybody, and if
10 anybody has even considered it or talked about how that
11 traffic will be coming into the community when K-12 is
12 being extended directly in there.

13 Thank you.

14 ASSOCIATE PLANNER SWAIN: Shelby Lynn
15 Sanderson.

16 MS. SANDERSON: Hello, and good evening
17 everyone. I'm Shelby Lynn Sanderson, your reigning
18 Miss Quartz Hill. I have attended Quartz Hill High
19 School for four years. I am currently a senior. I am
20 a proud resident of Quartz Hill for the past 16 years.

21 I'm here to express this evening -- or here
22 this evening to express a few of my concerns on the
23 potential rezoning of the property.

24 As an ambassador for my community I have had
25 the privilege of becoming involved with my community.

1 I have attended luncheons, business mixers, different
2 chamber functions where I have developed personal
3 relationships with the small business owners of my town.
4 I feel in these hard economic times we need to preserve



□

5 our local businesses. In my town alone we have family
6 owned tire stores, beauty salons, candy shops, a
7 pharmacy, and feed stores, just to name a few. And I
8 feel by rezoning this property it could possibly put
9 those businesses out of business, basically.

10 As a student at Quartz Hill High School, I'm
11 concerned about the possible construction that may take
12 place and the distractions that may occur with traffic,
13 noise, and pollution. The traffic there is absolutely
14 horrible. I don't even come to school until second
15 period, and I have no place to park. So, trust me, I
16 would be one of those people that park in the Wal-Mart
17 parking lot.

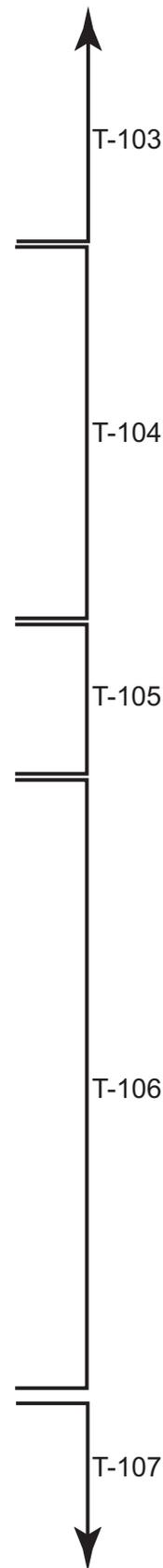
18 I'm also concerned about the dust and potential
19 health issues of thousands -- that the thousands of
20 students could be exposed to Valley Fever in the dirt.

21 Currently Quartz Hill High School is the leader
22 in academic scores within the Antelope Valley, and I
23 feel having a commercially zoned area across the street
24 from my school may have a negative impact on our student
25 learning, attendance, health, including tobacco and

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1 alcohol. We already have had alcohol problems at our
2 school. Kids bring it onto campuses all the time. And
3 the choice of food because we have gotten rid of every
4 horrible food that you can possibly think of.

5 The noise with the construction that would be
6 coming along with it you'll be able to hear from
7 Quartz Hill, and you definitely don't want to take away



□

8 learning from students that could possibly be running
9 the businesses out here. I mean, learning is huge and
10 with the noise -- I mean -- we have our classrooms are
11 right next to where there would be construction. You
12 would hear it horribly.

13 So I'm here tonight just asking you to take the
14 youth into consideration when you're casting your vote,
15 as we are the future of the Antelope Valley.

16 ASSOCIATE PLANNER SWAIN: Diana Tirado.

17 MS. TIRADO: Good evening. My name is Diana
18 Tirado. I am an Antelope Valleyan. I was born and
19 raised here, forty years.

20 And I guess I got my information messed up
21 because I came to fight for Quartz Hill High School
22 because I'm a parent of a junior at Quartz Hill High.
23 And she has to leave the house -- and we live right
24 there on K and 50th, and she has to leave the house at,
25 like, 6:55 in the morning to get to school to find a

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1 parking and be there by 7:30.

2 CHAIRWOMAN SMITH: And I know -- you know, I
3 know that you feel passionate --

4 MS. TIRADO: Yeah.

5 CHAIRWOMAN SMITH: -- and I do want to assure
6 you that -- that what you have to say to us is very,
7 very important to us. It's important for us to hear.
8 And I hate that you came all the way out here tonight to
9 kind of talk about the impact --

10 MS. TIRADO: Yeah.
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11 CHAIRWOMAN SMITH: -- but I really -- I really
12 do look forward to hearing what you have to say.

13 MS. TIRADO: But this traffic would be one of
14 the issues?

15 CHAIRWOMAN SMITH: Yeah.

16 MS. TIRADO: So definitely traffic.

17 And safety -- safety of the children, the
18 crossing the streets, having public stores so close to
19 the school to me would just have -- you know, people
20 being able to stalk the high schoolers more easily. You
21 know, right now there's empty fields, and you can always
22 see someone to me that doesn't belong in the area. And
23 the public facilities there, I think it would be harder
24 to, you know, decipher people who are stalking our kids.
25 It's all about the safety of our kids.

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1 So sorry for taking up your time --

2 CHAIRWOMAN SMITH: That's fine.

3 MS. TIRADO: -- but that's my problem.

4 CHAIRWOMAN SMITH: Thank you.

5 Can we take a short break? I think a couple of
6 us would like to take a short break or do we --

7 PLANNING DIRECTOR LUDICKE: Hold on a second.

8 CHAIRWOMAN SMITH: Okay.

9 PLANNING DIRECTOR LUDICKE: I have one
10 speaker's card remaining at this point.

11 CHAIRWOMAN SMITH: Oh, okay.

12 PLANNING DIRECTOR LUDICKE: I would remind you
13 that the Commission is committed to be here until at

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14 Least 8:00 o'clock.

15 CHAIRWOMAN SMITH: Yes.

16 PLANNING DIRECTOR LUDICKE: I would take this
17 gentleman's testimony.

18 CHAIRWOMAN SMITH: Okay.

19 PLANNING DIRECTOR LUDICKE: Then because we
20 don't have another speaker's card at this point, you
21 could take a break. If there are some when you come
22 back, then you can pick it up.

23 CHAIRWOMAN SMITH: Sounds like a good plan.

24 Thank you.

25 ASSOCIATE PLANNER SWAIN: José Arias.

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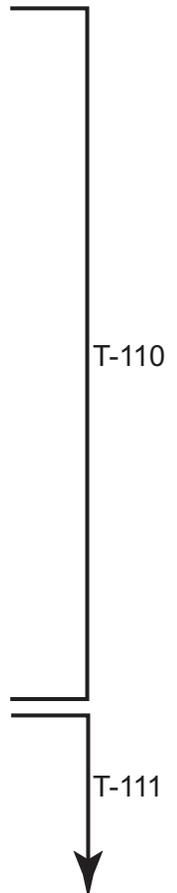
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1 MR. ARIAS: Good evening, everyone.

2 There's two things I wanted to talk about.

3 Visual characteristics of the area that were mentioned
4 in the environmental impact report. Pretty limited when
5 they spoke about how they can take that into
6 consideration, but one part that really stood out to me
7 was that the CEQA standards don't designate it as a
8 state scenic highway; therefore, it's not a big impact.
9 I think that's kind of a ridiculous standard, and it
10 needs to be elaborated because -- just because we don't
11 live on a scenic highway designated by the state doesn't
12 mean that people didn't buy homes in the area because of
13 what it looked like. Okay?

14 The other thing that I don't think I have seen
15 addressed anywhere is -- and it might be too late for
16 this part of it, but the information distribution. The



17 last thing I ever even heard of was that you only
18 receive mailers if you lived within some ridiculous
19 short distance from the project sites. I think because
20 this is something supposedly something that the City of
21 Lancaster is developing, proposing, considering, that
22 those mailers, especially in the area, should have been
23 expanded at least a couple of miles, at least as far as
24 the environmental report states that it's considering
25 having an impact. People in those residences should

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□

1 have received something.

2 All I have heard is it's just a project site, a
3 couple hundred feet. Those people weren't informed. I
4 don't think that's very fair to us.

5 CHAIRWOMAN SMITH: I believe it's 500 feet; is
6 that correct?

7 ASSOCIATE PLANNER SWAIN: It was 500 feet for
8 an automatic mailing, but for the past year and a half
9 anybody that has wanted to be on the mailing list could
10 be added. And I sent out, beyond just the draft EIRs,
11 over 750 notices to people who had requested to be on
12 the distribution list.

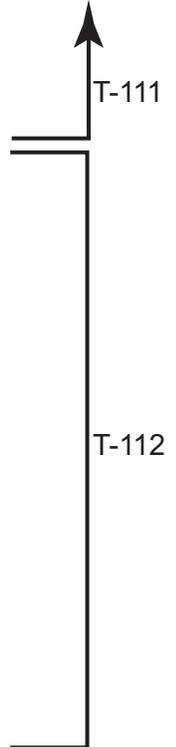
13 MR. ARIAS: 750 is a couple of square blocks.
14 Thank you for the effort, but --

15 ASSOCIATE PLANNER SWAIN: Actually, it went all
16 the way into Lake Elizabeth.

17 MR. ARIAS: Okay. Well, thank you, but I
18 haven't heard anything like that because I do believe
19 that more people would have showed up to here and to

20 other meetings if they were forewarned, especially the
21 first one when this environmental report was first
22 brought up at Quartz Hill High School.

23 And the other thing is that -- I understand
24 that we're talking about why we should have a project
25 site here and the effects of the EIR in the area, and



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1 everybody is concerned about the high school.

2 We should also mention that if we were to build
3 a high school, how about the reasons why we wouldn't
4 build it next to Wal-Mart and the mall? Okay?

5 Thank you very much.

6 CHAIRWOMAN SMITH: Okay. We will take a short
7 break. We will reconvene at quarter to 7:00. So a
8 ten-minute break.

9 Thank you.

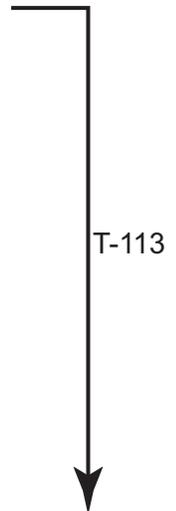
10 (Public hearing in recess from 6:36
11 p.m. to 6:49 p.m.)

12 CHAIRWOMAN SMITH: Okay. I think we have one
13 more speaker.

14 ASSOCIATE PLANNER SWAIN: Richard Lewis.

15 MR. LEWIS: Good evening, Commissioners. Thank
16 you for the opportunity to address this issue tonight.

17 I understand that you are receiving comments
18 strictly on the adequacy of the CEQA document. I'm not
19 a CEQA planner; so I'm -- I'll admit I don't know what's
20 adequate and what isn't. But just in reading it, I do
21 have some comments that are restricted to the public
22 services sections of both the documents for both



23 projects, Section 4-M.

24 Page 4-M-7, the documents state that:

25 "It is logical to anticipate that

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1 the crime rate in a given area will
2 increase as the level of activity or
3 population, along with the opportunities
4 for crime increases."

5 It seems odd to me here that the document
6 doesn't distinguish between types of activities.
7 Certainly a large commercial center is going to create
8 different sorts of crime opportunity and residential
9 uses as the properties are currently zoned.

10 Page 4-M-8, regarding the CEQA finding of
11 significant impact, there's a reference to service
12 ratios and response times and the performance objectives
13 of local law enforcement. And I want to say I have a
14 great amount of confidence and gratitude to our local
15 peace officers.

16 And I don't question their ability to do their
17 best to police whatever uses are applied to these
18 tracts. However, do we really want to be thinking in
19 terms of response times when it comes to our kids'
20 safety? If there is a response time, that means a crime
21 has happened, and that concerns me.

22 Page 4-M-9 makes reference to an increased
23 demand for police services coming out of this project
24 and that crimes against persons would be anticipated to
25 increase with the increased level of activity.

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1 And, again, I don't know if this is adequate,
 2 but to state persons here generally I don't think is
 3 enough because we're talking about a large number of
 4 minors and children in the adjacent school. And I don't
 5 think saying crimes against persons generally is
 6 sufficient.

7 In Section 4-M-10, Mitigation Measure 2-2
 8 refers to crime prevention features. I really don't
 9 think we can talk about crime prevention as though
 10 multiple crime will be prevented. I think we can talk
 11 about crime reduction, but if you were to refer back to
 12 Section 4-M-9 where it says that "Crimes against persons
 13 will be anticipated to increase."

14 Moreover, I think that the public safety risks
 15 for our youth in the school as a result of the proposed
 16 commercial projects are unacceptable. I think this is
 17 why the project or these parcels are currently zoned
 18 residential; because it best meets the needs of the
 19 community and protects the safety of our kids.

20 I'm not a CEQA planner, but my understanding is
 21 that because this project would require a zoning change,
 22 that it is a discretionary matter for the Commission and
 23 for the Council, irrespective of the adequacy of the
 24 CEQA document.

25 so I ask on both levels as you address CEQA in

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1 the matter of public safety and at your discretion under
2 this zoning change, that you please deny this project.

3 CHAIRWOMAN SMITH: Thank you.

4 ASSOCIATE PLANNER SWAIN: Patricia Williams.

5 MS. WILLIAMS: Good evening.

6 I have lived in the Antelope Valley for since
7 '90 -- 1990 I moved here. In all of those years, you
8 know, I have seen this valley change tremendously.
9 okay?

10 And I have recently -- well, in the last two
11 years I moved to the west side specifically to get away
12 from changes that I saw that came in with the Wal-Mart's
13 that they brought to the east side of Lancaster and all
14 the things that came along with that. Many homeowners,
15 you know, as well as myself, purchased homes in this
16 area to escape the urban city environment. Now these
17 people are bringing it in to change the entire character
18 of the neighborhood.

19 we didn't invest the amounts of money that we
20 did to move out in this area to have it impacted by
21 commercial businesses and the things that come along
22 with that.

23 You know, I just -- I'm just really
24 disappointed in the city. I think that it's to a point
25 where we have no neighborhood within Lancaster that is

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1 just going to be exclusively a neighborhood.

2 Thank you.



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3 CHAIRWOMAN SMITH: So we did promise to be here
4 until 8:00 o'clock; so whether people are going to speak
5 or not, we do want to extend the courtesy of letting
6 people who may be coming in from the valley or L.A. to
7 come in here and speak on this subject, too. So I don't
8 really know. It's kind of a unique situation; so I
9 think we just kind of go into a type of recess until
10 we --

11 PLANNING DIRECTOR LUDICKE: That would
12 certainly --

13 CHAIRWOMAN SMITH: But I certainly don't think
14 you want me to start singing for you in the
15 intermission. So....

16 UNIDENTIFIED AUDIENCE MEMBER: We have an hour
17 to kill. Could we each have another three minutes?
18 What's the worst that could happen?

19 CHAIRWOMAN SMITH: You could just start writing
20 your comments now, though.

21 UNIDENTIFIED AUDIENCE MEMBER: It's all here.

22 CHAIRWOMAN SMITH: There's plenty of time to do
23 that.

24 So we will -- Mr. Ludicke, you think that
25 perhaps just a recess until we gather more cards?

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1 PLANNING DIRECTOR LUDICKE: I would say that's
2 appropriate. And, you know, as you stated, we -- we,
3 the Commission, staff promised to be here until
4 8:00 o'clock to accommodate any comments that may come
5 in.

6 UNIDENTIFIED AUDIENCE MEMBER: Could we go
7 ahead and request from Ms. Joycelin the CDs, if need be?
8 Would this be a good time for that?
9 ASSOCIATE PLANNER SWAIN: I have a list. You
10 can add your name to it, and I can go to my office and
11 burn them if my computer is going to behave. So let me
12 know who wants them and I will go ahead and attempt to
13 burn them now.
14 UNIDENTIFIED AUDIENCE MEMBER: Could we ask
15 questions?
16 CHAIRWOMAN SMITH: No. Because we're really
17 not making decisions tonight, and --
18 UNIDENTIFIED AUDIENCE MEMBER: It was more of
19 what's the next procedure? Okay?
20 CHAIRWOMAN SMITH: I will let Mr. Ludicke
21 answer that.
22 UNIDENTIFIED AUDIENCE MEMBER: Oh, okay.
23 CHAIRWOMAN SMITH: Sure.
24 UNIDENTIFIED AUDIENCE MEMBER: Thank you.
25 PLANNING DIRECTOR LUDICKE: Once we have

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1 received all of the comments on the draft EIRS -- and as
2 we said, that -- that comment period closes on the 23rd
3 of February. It will be the responsibility of the City
4 to take all of the comments that had been provided,
5 either written or oral, and provide responses to those.
6 That information will have to go into the creation of
7 what's known as a final environmental impact report.
8 That document has to be prepared prior to any

9 consideration by the planning commission of the -- of
10 the projects that have been applied for.

11 As I indicated earlier, we don't have an exact
12 time for that. We estimate that it will take
13 approximately two months.

14 UNIDENTIFIED AUDIENCE MEMBER: Was tonight's
15 meeting recorded so that all the verbal concerns are now
16 documented somewhere?

17 CHAIRWOMAN SMITH: Yes.

18 UNIDENTIFIED AUDIENCE MEMBER: Okay. I'm just
19 keeping this informal.

20 UNIDENTIFIED AUDIENCE MEMBER: Will the final
21 review or the final draft of the EIR be public or is
22 that a final draft, and it's just whatever comes out of
23 that is --

24 PLANNING DIRECTOR LUDICKE: The final EIR is
25 what the City's final position on it is, at least from a

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1 staff standpoint. People still have the opportunity to
2 comment on the final EIR at the time of the public
3 hearings on the projects, but there is not another
4 formal process for review, like, you know, kind of an
5 interim draft EIR.

6 CHAIRWOMAN SMITH: Thank you.

7 UNIDENTIFIED AUDIENCE MEMBER: Would any future
8 public comments go to help make a decision on that final
9 draft?

10 PLANNING DIRECTOR LUDICKE: At the time that --
11 the next hearing opportunity is going to be on the

12 projects themselves, and that's -- that's critical
13 because comments that probably weren't that appropriate
14 to the EIR would be something that the Commission can
15 consider and weigh in terms of -- in terms of trying to
16 make a decision on the projects themselves.

17 The final EIR and the information contained
18 within those documents are actually part of that
19 information that the Commission has to consider as part
20 of its deliberation on the projects, as well as any
21 public testimony that -- that comes in.

22 UNIDENTIFIED AUDIENCE MEMBER: Will the changes
23 in the EIR regarding comments made tonight that were
24 legitimate, will they be highlighted in the final EIR so
25 that you can see, "Oh, they did change this"?

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1 ASSOCIATE PLANNER SWAIN: In the final EIR --
2 actually, what it is is the draft EIR, with any changes
3 we make to that draft and redline strikeout --

4 UNIDENTIFIED AUDIENCE MEMBER: Okay. That's
5 what I wanted to know.

6 ASSOCIATE PLANNER SWAIN: -- plus there will be
7 copies of the transcript made tonight. And any written
8 comment letters I receive, those are all scanned in. We
9 bracket each of the comments. So if your letter has
10 20 comments, you know, Comment Letter 2, Comment 1, and
11 we respond to each one of those in writing, and that's
12 part of the final EIR.

13 UNIDENTIFIED AUDIENCE MEMBER: And we receive
14 the draft EIR on CD form from you, which I did, I will

15 also receive the final?

16 ASSOCIATE PLANNER SWAIN: I can do that.

17 UNIDENTIFIED AUDIENCE MEMBER: Would you?

18 ASSOCIATE PLANNER SWAIN: Yes.

19 UNIDENTIFIED AUDIENCE MEMBER: And do I have to
20 sign up for it or --

21 ASSOCIATE PLANNER SWAIN: I can just -- I can
22 have anybody who submits comments on the draft EIR, if
23 I have your mailing address. So if you speak tonight,
24 make sure your mailing address is on the card.

25 UNIDENTIFIED AUDIENCE MEMBER: You keep the

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1 speaker cards?

2 ASSOCIATE PLANNER SWAIN: Yes.

3 And if you submit them in writing, I already
4 have your -- your mailing address. I will send copies
5 on CD of the final EIR to everybody who provided
6 comments.

7 UNIDENTIFIED AUDIENCE MEMBER: Right.

8 Thank you, ma'am.

9 UNIDENTIFIED AUDIENCE MEMBER: Two questions
10 for you real quick, if I may.

11 CHAIRWOMAN SMITH: I just want to make sure --
12 I want to check with our City Attorney if this is
13 something that should be going on at this point or
14 should we --

15 MR. ADAMS: Yeah. It's fine. It may be more
16 appropriate and possibly more convenient for the people
17 who have questions to simply go into recess, and if they

18 would like to ask that question --

19 CHAIRWOMAN SMITH: Okay.

20 MR. ADAMS: -- while we're in recess, that's --

21 CHAIRWOMAN SMITH: Why don't we do that.

22 UNIDENTIFIED AUDIENCE MEMBER: I do have a
23 question for you.

24 Wal-Mart collected several thousand signatures
25 from various residents through the entire Antelope

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1 Valley, including Lake L.A., Littlerock.

2 And did they submit those and is that part of
3 the EIR response?

4 ASSOCIATE PLANNER SWAIN: I have not received
5 anything along those lines. And that typically would
6 not be something submitted on an EIR.

7 UNIDENTIFIED AUDIENCE MEMBER: Okay.

8 MR. ADAMS: Vice Chair Smith. Vice Chair
9 Smith, just to clarify --

10 Did I catch you at a bad time?

11 CHAIRWOMAN SMITH: Time for a Twix. Sorry.

12 MR. ADAMS: I'll ask the question slowly. Are
13 we in recess now? I just wanted to clarify.

14 CHAIRWOMAN SMITH: Yes.

15 (Public hearing in recess from
16 7:02 p.m. to 7:43 p.m.)

17 CHAIRWOMAN SMITH: We will call the meeting
18 back to order. We are back in session. It is now
19 7:43 p.m.

20 PLANNING DIRECTOR LUDICKE: Michael Thacker.

21 MR. THACKER: Good evening.

22 I didn't realize I would be the first one to
23 speak after your break here.

24 But my main concerns are with the high school.

25 And I know that the environmental impact report does not 81

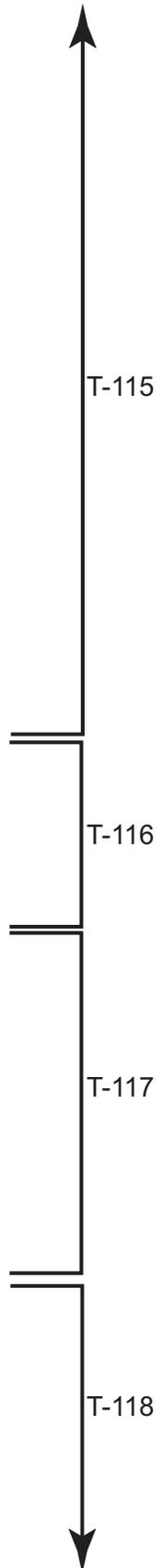
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1 seem to specifically mention the impact of safety, as
2 far as I could -- you know, it's a large environmental
3 impact report. But the safety of the students at Quartz
4 Hill High School should be paramount, and I don't think
5 it is. And I don't see it mentioned in the
6 environmental impact report as to the effects this
7 project would have on the safety of the students.

8 In addition, there's no reference to the
9 traffic flow on 65th Street and L-8. There's no mention
10 of putting in a light at 65th Street and L-8, which I
11 know would be impacted a lot.

12 Runoff, I'm not sure -- it mentioned that they
13 had paid for part of the catch basin. I don't know what
14 catch basin they paid for. I would like to know.
15 Specifically in the environmental impact, if you've
16 ever -- I live on that side, and if you have been down
17 60th Street in a major storm, you know that the amount
18 of runoff is extreme.

19 I don't see any response from L.A. County Water
20 Department as to their -- I see letters from Edison. I
21 see letters from other agencies, but nothing from
22 L.A. County water as far as whether they will be able to
23 serve this project, if we have enough water available.



24 Edison, in their letter, say they don't have enough
25 information to even see -- to say that there will be

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□

1 enough electricity for the project.

2 Per se, I'm not -- you know, I don't object to
3 having a shopping center -- large shopping center on the
4 west side. I think that's a good idea eventually. We
5 need something over there eventually.

6 But my concern, my fit daughter is beginning
7 her ninth grade year next year, and I believe it is a
8 California distinguished school, and I do believe that
9 this will definitely have an impact on -- on the -- on
10 the school. And anybody who denies that and doesn't
11 understand that in my opinion has ulterior motives,
12 profit mainly.

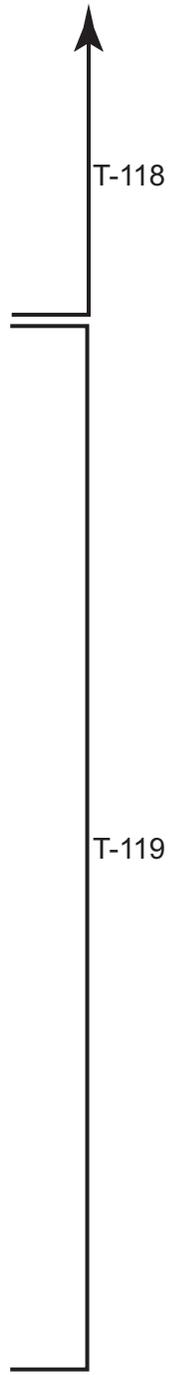
13 And understanding how much land is on the west
14 side, it's, you know, really ridiculous to put two super
15 centers over there. And not to say that it doesn't have
16 any impact on the environment of the children? I don't
17 see anything in the report about the effect on the kids.
18 It's ridiculous, absurd.

19 CHAIRWOMAN SMITH: Thank you.

20 MR. THACKER: Please look for somewhere else to
21 put your super center.

22 CHAIRWOMAN SMITH: And for those of you who may
23 have come in recently, I apologize to those of you who
24 have been here the whole evening and get to hear this
25 again.

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1 But tonight the comments are strictly about the
2 draft environmental impact reports, the content of the
3 reports, and you will have an opportunity in future
4 weeks to comment on the project itself. But tonight we
5 are not making any decisions. And just make sure you
6 kind of keep your comments on the actual report.

7 Thank you.

8 ASSOCIATE PLANNER SWAIN: Bruce Hailstone.

9 MR. HAILSTONE: Hello, Commissioners. My name
10 is Bruce B. Hailstone, real estate broker.

11 I operate business out at 5008 West Avenue L,
12 which is the intersection one mile due east of the
13 proposed project. I have been located at that location
14 for some 15-plus years, and I am here to state that the
15 environmental impact report I think insufficiently
16 addressed the traffic issue. And I know you heard a lot
17 about traffic issues earlier this evening, but that
18 corridor being two single lanes, and two -- one single
19 lane in each direction is horrendous. We average
20 approximately, in a severe accident, fender-bender of
21 some sort, on a weekly basis already at that
22 intersection, and it's largely because of the children
23 exiting and coming out of school because that's
24 obviously the peak traffic hour, both in the morning and
25 again in the afternoon.

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2 obviously is going to substantially impact that entire
3 Avenue L corridor. I realize that's someday going to be
4 further developed and those streets widened, but any
5 time in the near future the impact is not just the
6 immediate area in and around the 60th Street West and
7 Avenue L location where these entities are planning on
8 residing.

9 We obviously are going to have a horrendous
10 problem down the entire Avenue L corridor that currently
11 is still two lane, one each way, up to 40th Street West.
12 So we're actually dealing with a two-mile stretch of
13 highway that needs some serious attention if any of
14 these projects are approved in that general area.

15 The concept of flood control, I mean, I of all
16 people are really familiar with what that problem is
17 down there, and even though that is -- the water is
18 flowing down through our area, there is a substantial
19 amount that is coming down through that 50th to 60th
20 corridor area, and it's heading north. But it's still a
21 substantial problem.

22 I think additional development along 60th --
23 because my three children went to Quartz Hill High
24 School is -- we recognize that entire area needs to be
25 addressed and dealt with -- some of the flood control

1 problem that Quartz Hill is already experiencing.

2 The connection right now just down 50th Street
3 West is still a problem, makes a 90 degree turn at L and
4 50th, again continuing north down 52nd-ish. But that



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5 entire corridor is a mess, and we -- that needs to be
6 addressed severely as a condition of any development.

7 Personally, I think the development of any
8 kind, super center or anything large, our forefathers
9 saw the wisdom in zoning that area residential for the
10 benefit of the high school. I think it would be
11 irresponsible of our government to make any decision to
12 allow any kind of substantial commercial development in
13 that area.

14 Thank you.

15 CHAIRWOMAN SMITH: Thank you.

16 PLANNING DIRECTOR LUDICKE: No other cards at
17 this point.

18 CHAIRWOMAN SMITH: We have ten more minutes.
19 And we'll just kind of hang around. Right?

20 (Pause in proceedings.)

21 CHAIRWOMAN SMITH: Looks like we have another
22 speaker.

23 PLANNING DIRECTOR LUDICKE: David Gaspen.

24 MR. GASPEN: Hi, Mr. Ludicke. My name is Dave
25 Gaspen, and I live in Quartz Hill, 4855 West Avenue N.

□

1 And I have heard a lot of reports. And I
2 attempted to access the environmental impact report that
3 was presented, but I couldn't do it today.

4 I've had a couple of thoughts. I actually do
5 live in Quartz Hill, not from the -- not very close to
6 the proposed development, but I am still a Quartz Hill
7 resident. And I have one concern -- or several



8 concerns.

9 One is, we're going to put a -- this proposed
10 shopping center that's going to consume an awful lot
11 of water. And we don't seem to have -- and -- or
12 I should say we seem to have a lot of problems with
13 the fact that we don't have enough water here in the
14 valley right now. And that, I would presume, would be
15 a problem because if the shopping centers go in,
16 individually or collectively, where are we going to get
17 that water that we're now going to be using? Although
18 it's not part of the environmental impact report, do we
19 really need five Wal-Marts in this valley?

20 Thank you very much.

21 CHAIRWOMAN SMITH: Thank you.

22 Okay. Are there any other speaker cards?

23 All right. We will move on at this point to
24 director's announcements.

25 Mr. Ludicke, do you have any announcements?

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1 PLANNING DIRECTOR LUDICKE: My only
2 announcement is that given the fact that it appears that
3 all speakers have been accommodated this evening, we
4 will not reconvene tomorrow.

5 CHAIRWOMAN SMITH: Okay. Thank you.

6 Commission agenda. Any commissioners have any
7 comments?

8 (No comments.)

9 CHAIRWOMAN SMITH: Okay. I'm going to sit out
10 the next two minutes, then. We made a promise.



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11 (Pause in proceedings.)

12 CHAIRWOMAN SMITH: Okay. No other speaker
13 cards.

14 She's filling out a card. It looks like we
15 have one more. Okay. We have another speaker. You can
16 remain up here if you like.

17 PLANNING DIRECTOR LUDICKE: Lee Simmons.

18 CHAIRWOMAN SMITH: Welcome.

19 MS. SIMMONS: Hi. Thank you.

20 I live on 52nd and Avenue L, and I know that
21 we -- that area is -- took me a long time to -- okay.

22 I have to take my kids -- I have two kids in
23 Quartz Hill High. And it took me -- just for my house
24 to -- I have to -- the traffic part, I have to take a
25 bicycle there because I cannot go up straight Avenue L.

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1 Anyway, the main thing I'm talking about, I'm
2 very concerned about if you put the Wal-Mart in, the
3 crime will -- because once you have store, you're going
4 to have a bank. Once you have store, business coming,
5 the -- what do you call? -- the bank will be close to --
6 and the -- I'm sorry.

7 CHAIRWOMAN SMITH: It's okay.

8 MS. SIMMONS: What I want to start to say is
9 that Wal-Mart will not be only one come in.
10 Supermart -- Target will not be the only one there. You
11 will possible have -- what is that? -- another store
12 coming. Impossible with gunshot -- and possible have
13 cigarette -- cheap retail space. Possible will be have

14 liquor stores come in. Possible have -- in the future,
15 possible nightclub come in.

16 Once you rezoning, is the commercial zone, any
17 store can come in. All the store coming in, you're
18 bringing the crime, bring the different type of people
19 in.

20 So if you put that -- the kids, 3,000, 4,000
21 kids surrounded by that kind of environment, you have
22 hodgepodge.

23 And besides the cross here, we also have the --
24 the school on the north side. We also have Joe Walker
25 on the south side of the future Target shopping center.

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1 So it's not just Quartz Hill affected. Also elementary
2 school, Joe Walker Elementary School also will be
3 surrounding that new store coming in.

4 So we are not -- I know, you know, right now we
5 talking about Quartz Hill High, but it's not just Quartz
6 Hill High. We are talking about small kids, elementary
7 school, middle school, and high school. And those other
8 stores bringing in from the Wal-Mart, from the Target,
9 you will multiple, and we have to consider about the
10 future of our kids.

11 Thank you.

12 CHAIRWOMAN SMITH: Thank you.

13 Okay. Seeing no other speaker cards, thank you
14 for joining us tonight.

15 This meeting is adjourned.

16 (PROCEEDINGS CONCLUDED AT 8:04 P.M.)

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1 CERTIFICATE
2 OF
3 CERTIFIED SHORTHAND REPORTER
4
5 I, TIMOTHY SCOTT, CERTIFIED SHORTHAND
6 REPORTER, CERTIFICATE NO. 8517, DO HEREBY CERTIFY:
7 THAT SAID PROCEEDINGS WERE TAKEN BEFORE ME
8 AT THE TIME AND PLACE THEREIN SET FORTH AND WERE TAKEN
9 DOWN BY ME IN SHORTHAND AND THEREAFTER TRANSCRIBED, SAID
10 TRANSCRIPT BEING A TRUE COPY OF MY SHORTHAND NOTES
11 THEREOF.
12 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL
13 FOR, NOR RELATED TO, ANY PARTY TO SAID PROCEEDINGS, NOR
14 IN ANY WAY INTERESTED IN THE OUTCOME THEREOF.
15 IN WITNESS WHEREOF, I HAVE HEREUNTO
16 SUBSCRIBED MY NAME THIS DATE: MARCH 2, 2009.

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CERTIFICATE NUMBER 8517

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Appendix B

Revised Economic Analysis

**UPDATED ECONOMIC, FISCAL AND “URBAN DECAY” ANALYSIS
OF LANE RANCH TOWNE CENTER,
A PROPOSED SHOPPING CENTER
IN THE CITY OF LANCASTER, CALIFORNIA**

Prepared for:

Planning Department
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534

Prepared in association with
Whitney & Whitney, Inc.

Updated Draft

June 2009

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EXECUTIVE SUMMARY

Introduction

The following report provides an analysis of the general economic and fiscal impacts of the Lane Ranch Towne Center (“Project”), a proposed shopping center that would be developed in the City of Lancaster, California, and the potential for the operation of the Project to directly or indirectly cause “urban decay,” as that concept has been addressed in court decisions interpreting the California Environmental Quality Act (CEQA). This report supersedes the economic, fiscal and urban decay analysis for the Project dated October 2007, and accounts for changed economic circumstances associated with the current national recession. It also reflects changes in certain physical parameters and retail distribution of the Project.

The general economic impacts of the Project refer to the jobs, worker compensation and total economic output associated with the Project’s construction and annual operation once it is completed and occupied. These impacts are measured at the scale of the County of Los Angeles, because that is the geographic scale at which total impacts are captured. The fiscal impacts of the Project refer to the difference between recurring annual Project-related tax and other revenues that are specific to the City of Lancaster and the marginal (i.e., incremental) costs for the provision of municipal services to the Project site.

The potential for the Project to cause “urban decay” — which has been described as a chain reaction of store closures and long term vacancies, ultimately destroying existing neighborhoods and leaving decaying building shells in their wake — involves a two-part analysis. First, it must be determined whether the Project will likely attract retail sales away from existing and/or other planned future retail centers and downtown districts to any significant degree. Second, if it can be reasonably foreseen that sales will be attracted away from other retailers, it must be determined whether the severity of this change in economic circumstances will likely cause disinvestment that is significant enough to result in business closures, abandonment or other forms of physical deterioration that may be considered manifestations of “urban decay.”

The Lane Ranch Towne Center (“Project”) would consist of 395,355 square feet of Gross Leasable Area (GLA) that is to be distributed between retail stores, eating and drinking facilities and non-retail services space as summarized in Table 1 below.

Table 1
PROPOSED LANE RANCH TOWNE CENTER

<u>Space Category</u>	<u>Square Feet GLA 1/</u>
Retail	
Target Department Store, Including Garden Center	149,362
Home Improvement Store, Including Garden Center	160,221
Drug Store	17,272
Other Retail Shops	47,500
Eating & Drinking Facilities	16,000
Services	5,000
Total GLA	395,355

1/ GLA: Gross Leasable Area.

Source: Lane Ranch LLC; HR&A Advisors, Inc.; W&W, Inc.

Construction is planned for completion by 2011, making 2012 the first full calendar year of the proposed center's operation.

Economic Impacts Analysis

Using the well-established IMPLAN input-output model of the Los Angeles County economy, it is estimated that the planned expenditure of about \$55.4 million to construct the Project will result in a total economic output impact of \$95.6 million (in 2008 dollars) in the Los Angeles County economy, generating 626 total full-time and part-time jobs, of which 373 will be involved directly in the Project's construction, as shown in the top panel of Table 2. Most of the direct (i.e., construction) and many of the indirect (i.e., materials and services supplied to contractors) economic impacts of Project development will occur in the City of Lancaster economy. Some of the remaining impacts (i.e., from household spending by direct and indirect workers) may occur in the City, but most will occur elsewhere in the County economy where these workers reside.

Table 2
 EMPLOYMENT AND OTHER ECONOMIC IMPACTS IN LOS ANGELES COUNTY FROM
 CONSTRUCTION AND OPERATION OF THE LANE RANCH TOWNE CENTER
 (all dollar amounts in 2007 \$)

<u>Impact Category</u>	<u>DUE TO PROJECT CONSTRUCTION</u>			<u>Total Impact¹</u>
	<u>Direct Impact</u>	<u>Indirect Impact</u>	<u>Induced Impact</u>	
Employment				
Construction	372.9	-	-	372.9
Other	-	105.8	147.5	253.3
Total	372.9	105.8	147.5	626.2
Employee Compensation	\$18.3 million	\$5.7 million	\$6.2 million	\$30.2 million
Total Economic Output	\$55.4 million	\$18.9 million	\$21.4 million	\$95.6 million
	<u>DUE TO ANNUAL OPERATION OF THE COMPLETED PROJECT</u>			
<u>Impact Category</u>	<u>Direct Impact</u>	<u>Indirect Impact</u>	<u>Induced Impact</u>	<u>Total Impact¹</u>
Employment	624.5	83	107.1	814.7
Compensation	\$16.2 million	\$4.6 million	\$5.1 million	\$25.8 million
Total Economic Output	\$41.9 million	\$15.2 million	\$17.6 million	\$74.7 million

¹ Totals may not sum precisely due to independent rounding.

Source: HR&A, Inc.

Once the Project is in full operation in 2012, it is estimated that its \$130.7 million in annual sales will result in a total economic output impact of \$74.7 million (in 2008 dollars) in the Los Angeles County economy, including 815 total full-time and part-time jobs, of which 625 will be directly located at the Project, as shown in the bottom panel of Table 2. The direct and total economic output impacts of the Project are less than the amount of projected annual sales, because the economic impacts of retail sales are based only on the gross margin on direct sales (i.e., not including the cost of production, transportation and warehousing). Here again, most of the direct (i.e., retail sales) and many of the indirect (i.e., materials and services supplied to retail tenants) economic impacts of Project development will occur in the City economy. Some of the remaining impacts (i.e., from household spending by direct and indirect workers) may occur in the City, but most will occur elsewhere in the County economy where these workers reside.

Fiscal Impacts Analysis

The Project will also yield \$142,784 in one-time revenues to the City of from sales tax on construction materials and real estate transfer tax on the purchase of the Project site. Various permit, planning and mitigation fees are not included, because they directly offset City costs and therefore do not yield net new revenue to the City. In the opening year of 2012, the Project will yield about \$1.4 million from the City's share of the net increase in property tax, in-lieu Vehicle License Fee revenue, sales tax revenue, and business license tax revenue. Over the following 20 years, the Project will generate \$40.1 million in tax revenue to the City (\$12.0 million in 2008 dollars). The Project's revenue projections are summarized in Table 3.

Table 3
ESTIMATE OF ONE-TIME AND RECURRING ANNUAL TAX REVENUES
TO THE CITY OF LANCASTER FROM CONSTRUCTION
AND OPERATION OF THE LANE RANCH TOWNE CENTER

One-Time Revenues							
Construction Materials Sales Tax	\$	138,374					
Real Estate Transfer Tax	\$	4,410					
Total One-Time Revenues	\$	142,784					
Annual Recurring Revenues		Nominal \$		2008 \$			
		Opening Year	Over 20 Years	Opening Year	Over 20 Years		
Property Tax	\$	41,478	\$ 1,069,440	\$ 28,957	\$ 329,739		
In Lieu MVLF	\$	80,914	\$ 2,005,232	\$ 47,198	\$ 618,271		
Sales Tax	\$	1,290,628	\$ 37,010,666	\$ 901,014	\$ 11,058,742		
Business License Tax	\$	1,802	\$ 51,673	\$ 1,258	\$ 15,440		
Total Recurring Revenues	\$	1,414,822	\$ 40,137,013	\$ 978,427	\$ 12,022,191		

Source: HR&A, Inc.

The tax revenue estimates and projections are based on the first round of Project-related spending only — i.e., the tax revenues derived directly from Project construction and the Project’s annual sales. Secondary and tertiary sources of tax revenue will also be generated as a result of expenditures by local businesses that supply goods and services for construction of the Project, and to the retail tenants that will occupy it. The amounts of these indirect and induced tax revenues, and the degree to which they will accrue to the City, are not susceptible to reliable estimation. Therefore, the estimates presented in this report understate, to some unknown degree, the actual tax revenues the Project will produce for the City.

The Project will not have any significant marginal (i.e., incremental) impacts on City services, according to the Project’s Environmental Impact Report, and from this perspective, the Project’s net new revenues to the City represent the net fiscal impact of the Project (i.e., \$1.4 million in 2012). Any costs generated by the Project for fire protection will be paid from a share of the property tax allocated to the County Fire District.

Urban Decay Analysis

The analysis presented here evaluates whether development of the retail and dining space contained in the Project, alone and in combination with other planned retail projects, will result in such intense competition that there is likely to be a significant adverse economic impact on existing retail developments in the City of Lancaster and other nearby jurisdictions that leads to “urban decay” as this concept has been defined by court decisions interpreting the California Environmental Quality Act (CEQA). Methodologically, the potential for such an impact can be determined in a given market area through a comparison of the projected growth in demand for retail goods, as measured by the change in supportable retail space for particular retail store categories, with the amount of proposed additions to the supply of retail space. In this particular context, the analysis focuses on whether the proposed amount of floor area in each major retail and dining use category planned for the Project exceeds the likely increase in demand for those same uses within the relevant market area(s) serving the Project, where demand is measured by

the anticipated growth in population and per capita personal income that would be available for expenditures on the specified retail goods and dining activities.

If the amount of retail and eating and drinking facility space planned for the Project, together with proposed retail space for comparable uses in other planned projects within the same time frame, *is equal to or less than* the increase in space that can be supported by projected increases in future demand, it can be concluded that the proposed Project is not exerting significant adverse competitive pressures that could potentially lead to urban decay. This conclusion follows the logic that the growth in customer demand will be large enough to economically support both the Project and other existing and planned projects offering comparable retail and restaurant uses. Given such circumstances, there is no need to further evaluate the potential for urban decay as a consequence of the development of the Project.

Conversely, if the proposed change in the supply of floor area for retail and eating and drinking activities exceeds anticipated growth in demand, the resulting competitive conditions could challenge existing retailers and restaurateurs to such a degree that net sales could be attracted away from their existing stores without their likely replacement by sales from new sources of demand. Under such circumstances, further analyses is required to assess whether it is foreseeable that this draining of sales from existing businesses could logically result in significant disinvestment, business closures, store abandonment and other forms of physical deterioration leading to “urban decay.” Such additional investigation would include, for example, determining whether the exceedance concerns an anchor store whose fate is more central to the financial survival of the adjacent retail; the likelihood that stores suffering from significant competition caused by a new project can be reused for other retail or non-retail uses; and/or whether the competition is between stores of the same national retail brand, which may be willing to absorb short-term losses to gain local market share.

Making these economic impact measurements requires: (1) establishing appropriate market areas for each retail and restaurant category in the Project for which such retail space will be provided; (2) projecting the scale of customer demand based on population growth, income growth and spending growth for those use categories over a relevant time period (in this context, 2007-2012); (3) converting projected changes in future customer retail spending and eating and drinking facility spending into magnitudes of supportable square feet of gross leasable floor area (GLA), so that the projected increase in supportable space can be compared directly with the projected change in supply proposed for each retail space category in the Project’s development program; and (4) comparing the magnitude(s) of supportable space with the proposed supply of space and evaluating the results of this comparison.

Following the methodology outlined above, separate market impact analyses were conducted for the four basic types of retail and restaurant uses that are to be included in the Project: (1) Shopper Goods, consisting of stores offering General Merchandise (typically, department stores); Apparel and Accessories stores; Home Furnishings, Furniture and Appliance stores; and Other (or Specialty) retail stores; (2) Building Materials and Garden Supply stores; (3) Convenience Goods stores, including both food/ beverage stores (e.g., supermarkets,

bakeries, liquor stores) and drug stores with pharmacies; and (4) Eating and Drinking Facility space, including both fast food facilities and “sit-down” restaurants serving alcohol.¹

The analysis presented in the report leads to the following urban decay impact findings and conclusions:

- ***Delineation of Market Areas.*** Given the dispersed character of existing development patterns in the Antelope Valley and the location of existing and proposed competitive retail facilities, two market areas were established for the determination of potential demand for the four classes of retail goods that were evaluated in the analysis: (1) a *Primary Market Area* (PMA) encompassing the geographic circle of land area situated within five miles of the Project site, utilizing as a centroid the intersection of 60th Street W and West Avenue L; and (2) a *Secondary Market Area* (SMA) encompassing a circular ring around the PMA that extends from five to 10 miles around the Project site. For certain types of retail goods — notably, Shopper Goods and Building Materials and Garden Supplies – the PMA would provide 70 percent of the market support and the SMA 30 percent of the market support. For other classes of goods (e.g., Convenience Goods and Eating and Drinking Facilities) between 85 percent and 100 percent of the market support would be expected to be generated from the PMA.

The delineation of a secondary market area is particularly appropriate in this analysis due to the possibility that the Project will share the intersection at 60th Street West and West Avenue L with another proposed retail development known as The Commons at Quartz Hill (“The Commons”), which is also planning its first full year of operation in 2012. Together, the two centers would provide nearly 800,000 square feet of new retail space in the Lancaster market, making this location one of the largest retail concentrations in the Antelope Valley and enhancing its drawing power well beyond the normal range for a single 400,000 square foot shopping center.

- ***Sources of Market Support.*** The PMA for the Project is an historically fast-growing residential community of single-family detached homes occupied by residents whose incomes are higher than the Los Angeles County average. Between 2007 and 2012 the resident population of the PMA—defined as those residents living within five miles of the Project-- is forecasted to increase by 13,254 persons, and should provide the major source of market support for the Project. In addition, the Project’s location, coupled with its anchor stores and the presence of an adjacent retail development known as The Commons at Quartz Hill (“The Commons”), should allow for it to draw additional market support from the SMA, defined here as the resident population living within a five- to 10-mile band around the Project site. According to recently updated forecasts, between 2007 and 2012 the SMA is projected to grow by 18,017 persons and contribute 30 percent of the total market support for the Shopper Goods and Building Materials/Garden Supply space at the Project.

¹ In its aggregation of sales generated by Eating and Drinking Facilities, the State of California typically classifies restaurants by whether or not they sell alcoholic beverages. Characteristically, “Restaurants-No Alcohol” include fast food establishments, coffee shops and smaller convenience-oriented facilities such as doughnut shops; “Restaurants Serving Alcohol” encompass larger “sit-down” establishments that include both major dinner restaurants and bars.

The growth forecasts have been examined from both an historical perspective, recent changes in the national and regional economy, and from a review of proposed developments in the market areas. A recent listing of planned developments suggests that about 9,800 units have been proposed for development in the PMA alone that could generate population growth over 29,000 persons. While the actual timing and delivery of this product is open to some question, due to the downturn in the housing market and economy in general, where mortgage foreclosures have spiked and access to mortgage debt has become more difficult, the forecasts appear to be realistic in their expectation that major growth is likely to continue in the Antelope Valley subregion after the current recession and to extend well beyond 2012.

- ***Competitive Supply Considerations.*** As noted above, in addition to the Project there is a proposed development known as The Commons that would be developed at the same intersection that would initiate operations in the same full calendar year, 2012. As presently conceived these two developments together would add a total of 761,731 square feet GLA of retail space. Given their proximity and timing, they will likely function as one large project in terms of their potential drawing power in the local market areas. Effectively, the juxtaposition of these two centers should allow them to achieve “agglomerative” benefits in that the range of choice provided by the combined retail offerings at the two sites should enhance the location as a retail destination for SMA residents and enhance this location’s customer drawing power beyond the normal market reach of a single 400,000 square foot GLA community shopping center.

- ***Urban Decay Findings and Conclusions.*** The analysis presented in this report compares: (1) the possible future supply of proposed retail and related space that would be provided by the Project and 13 other proposed retail developments during the analysis period 2007-2012 with (2) the projected incremental growth in resident demand for the same period, for each of five types of retail space: (1) General Merchandise, including major department stores; (2) Building Materials and Garden Supply stores; (3) Food and Beverage facilities; (4) Drug Store/Pharmacy stores; and (5) Eating and Drinking facilities. For three retail space categories — General Merchandise, Food/Beverage and Eating/Drinking facilities — the analysis suggests that given probable growth trends the market forces of demand and supply will largely be in balance by 2013, thus within the second calendar year after the proposed space has become fully operational. In contrast, assessment of the competitive market conditions for two retail categories, Building Materials/Garden Supplies and Drug Store/Pharmacy space, raised issues related to potential imbalances from oversupply that needed further consideration.

With respect to the Building Materials and Garden Supplies retail category, as presented above there are presently two proposals for the development of a major home improvement center within the PMA over the period 2007-2014 on sites located one mile apart on 60th Street West — one at the Project, which shares the West Avenue L/60th Street West intersection with The Commons² and the other in a retail center located one mile north at 60th Street West and West Avenue K. Per current development schedules,

² The Commons would provide only a 21,624 square foot GLA Garden Center within a Wal-Mart, and thus is not a significant contributor to the potential oversupply problem in this retail space category.

the Project's home improvement center would be completed first³ in 2012, and would occupy the superior location in terms of serving the future market. The market review indicates that there is little likelihood that there will be sufficient sales generated by the increase in resident spending to support both projects at suitable sales levels until well after 2016. As a result, if both major home improvement centers are developed by the dates proposed, there could be serious competitive conditions that lead to one or even both stores closing down and leaving a residual supply of vacant retail space. This possible negative market outcome — where the two major home improvement centers are built in the next five years on the 60th Street West sites and one or more of these stores then closes — is unlikely for at least the following reasons:

- First, while the potential operators of the home improvement centers have not been identified, the similarities of the project size, location and timing suggest that the same operator may be considering alternative sites, and would not proceed with both stores until market conditions were suitable to accommodate both outlets; and
- Second, the competitive circumstance of two competing home improvement stores is projected to occur at a date at least five years from the date of this report, thus there is ample time for the developers of both the centers and the potential operators of the home improvement facilities to consider market conditions before committing to the creation of a potentially significant oversupply and a large amount of vacant, unproductive space.

With respect to Drug Store/Pharmacy space, as discussed above a conventional comparative analysis of the potential growth in demand for such space with proposed supply indicates that there will likely be a significant oversupply of space in the near future. However, further review suggests that new drug store development is being driven in large part by major drug store chains that are positioning many of their new stores at strategic locations around the existing hospitals and medical offices that are situated on the periphery of the PMA and centered on 15th Street between Avenue J and Avenue K. Moreover, while as many as six new drugstores could be developed at the Project and at other proposed centers within two miles of the Project site, such competitive circumstances do not portend conditions that are considered likely to lead to urban decay, for the following reasons:

- Of the six drugstores proposed at the Project and other nearby sites, two are small pharmacies that would be “imbedded within larger department stores, thus are not likely to be of great significance to the overall feasibility of the host department store or the retail center;
- The other four drugstores proposed for the immediate vicinity of the Project are being developed at centers with more than one anchor tenant, are being situated on visible pads, and are being built at a scale (under 18,000 square feet GLA) that can be economically re-tenanted, thus do not present a serious economic issue to the center operator if any should fail;

³ The second home improvement center is scheduled for opening in 2014.

- The proposed drugstores in all likelihood will be operated by major drug store chains that have the financial ability to survive low sales performances in the early years while the store develops a presence in the market place; and
- The existing drug stores in the PMA are either well-established in viable shopping centers or well-located on sites that can be re-utilized by other types of retail activities, thus are not likely to create major long-term vacancies that could lead to urban decay.

Overall, the analysis concludes that, while the Project together with other new shopping centers will add new competitive retail and restaurant facilities to the Antelope Valley region, there is no reasonable likelihood that the operation of the Project and the other projects identified in this analysis as they are presently conceived would result in significant adverse economic competition to the degree that this competition would lead to urban decay.

This overall conclusion also applies to the commercial district located at the intersection of Avenue M/Quartz Hill Road and 50th Street West in the unincorporated community of Quartz Hill, approximately 1.4 miles from the Project. Anchoring this district are a number of local-serving institutions, including County facilities (fire station and library) as well as a post office and an elementary school. Existing businesses include: an Antelope Valley Bank branch; animal hospital; several veterinary clinics; mini-storage facilities; equipment rental; feed and tack stores; garden center; building supplies; beauty salons; fitness/karate facilities; casual eating and drinking facilities; and numerous automobile-oriented businesses, including service stations, auto repair garages, automotive painting, and auto parts and muffler stores. These businesses offer goods and services that are substantially different from those planned for the Project, though there could be limited overlap, depending on the Project's specific retail or service businesses when the Project is fully leased. Moreover, the district has no dominant business or group of stores that anchors it and is similar to the Project. Therefore, any limited competition between the Project and any individual store(s) in the district would not have an impact on the district so severe that it could foreseeably lead to "urban decay" within the meaning of CEQA.

I. INTRODUCTION

A. Purpose of the Analysis

This report provides an updated analysis of the economic and fiscal impacts of Lane Ranch Towne Center (“Project”), a 395,355 square foot proposed retail development located at the intersection of 60th Street West and West Avenue L in the City of Lancaster (“City”), County of Los Angeles, and the potential for the operation of the Project to directly or indirectly cause “urban decay,” as that concept has been defined in court decisions interpreting the California Environmental Quality Act (CEQA).⁴ This report supersedes the economic, fiscal and urban decay analysis for the Project dated October 2007, and accounts for changed economic circumstances associated with the current national recession. It also reflects changes in certain physical parameters and retail distribution of the Project.

The general economic impacts of the Project refer to the jobs, worker compensation and total economic output associated with the Project’s construction and operation. These impacts are measured at the scale of the County of Los Angeles, because that is the geographic scale at which total impacts are captured. The fiscal impacts of the project refer to the difference between recurring annual project-related tax and other revenues to the City of Lancaster and the marginal (i.e., incremental) or average costs to provide services to the project site.

Analysis of the potential for new retail development to cause urban decay — “. . . a chain reaction of store closures and long term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake”⁵ — requires a two-stage analysis. First, it must be determined whether the new retail development will attract retail sales away from existing and/or other planned future retail centers to any significant degree. Second, if this is the likely outcome, then it must be determined whether the severity of this change in economic circumstances will likely cause significant disinvestment to such a degree such that it is reasonably foreseeable that business closures, store abandonment or other forms of physical deterioration or “urban decay” will result.

This report was prepared for the City of Lancaster by HR&A Advisors, Inc. (HR&A), in association with Whitney & Whitney, Inc. (W&W). The two firms provide independent professional urban and other economic analysis to a wide range of public and private clients. Summaries of the firms’ respective qualifications are included in Appendix A to this report.

B. Overview of the Proposed Lane Ranch Towne Center

The following is an updated summary description of the proposed Project.

² Collectively, Cal. Public Resources Code § 21000, *et seq.* and Calif. Admin. Code §15000 *et seq.*, commonly referred to as the “CEQA Guidelines.”

⁵ *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184 at 1204.

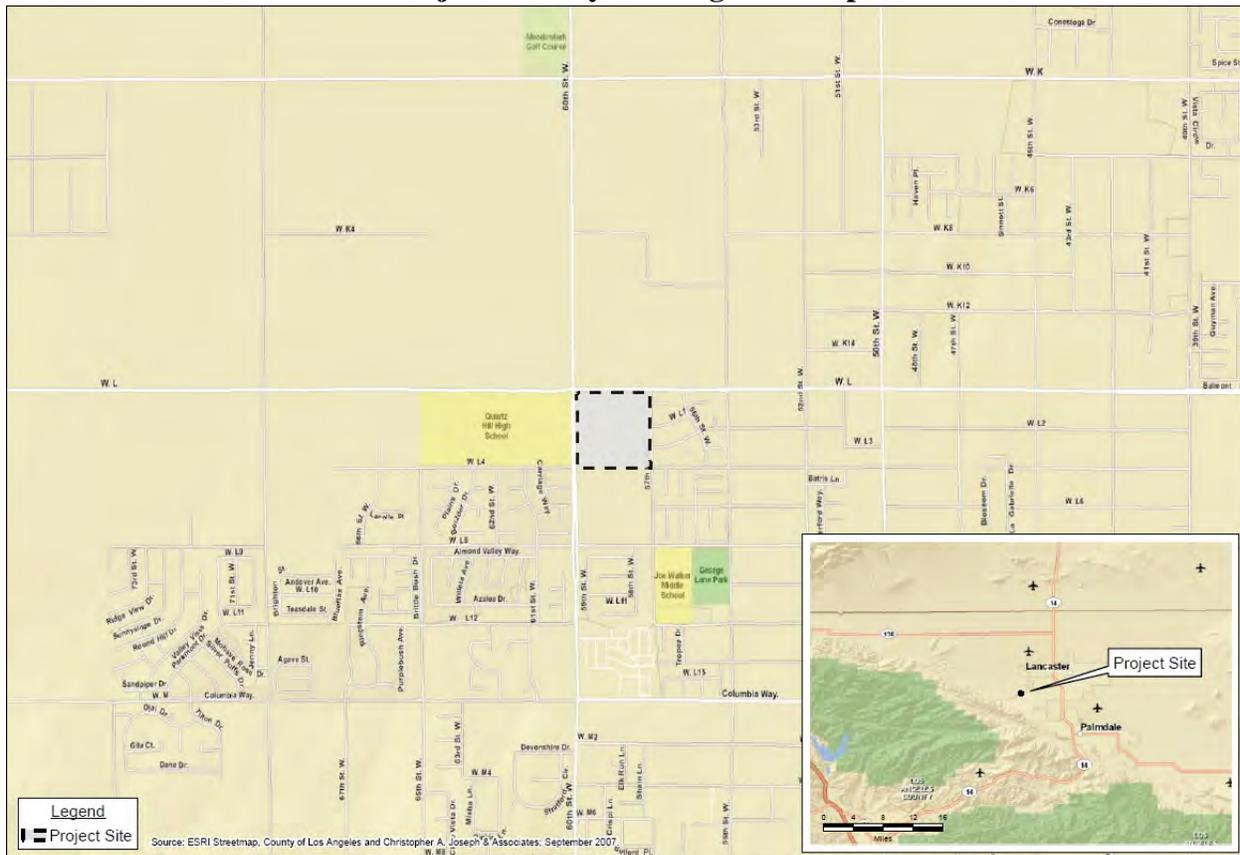
1. Project Location

The Project would be located on the southeast corner of the intersection of 60th Street West and West Avenue L in the City of Lancaster, California. The site lies about 4.5 miles west of S.R. 14/138 (the Antelope Valley Freeway), a major north-south regional highway that connects the Antelope Valley with the Santa Clarita Valley, San Fernando Valley and other urbanized portions of Los Angeles County.

The two streets that provide direct frontage and ingress/egress to the Project — West Avenue L and 60th Street West— are regional arterial roads that are part of the one-mile grid system of streets and highways that cover the urbanizing portions of the Antelope Valley. In addition, 60th Street West and its extension to the south known as Godde Hill Road provide important direct access across the San Andreas Fault to Elizabeth Lake Road and the residential areas of the Leona Valley.

The Project's location is unlike that of most of the other major shopping centers in the Antelope Valley that have been positioned on sites on or near Antelope Valley Freeway. In this regard, its westerly location relative to its competition places the site at an important point of "interception" for residents living in the western Leona Valley/Lake Hughes area or visitors coming into the area from other destinations found westerly of the Antelope Freeway corridor. The site's location in the Antelope Valley is shown in Figure 1 below.

Figure 1
Project Vicinity and Regional Map



Source: Christopher A. Joseph & Associates

2. Project Description

The Project is situated immediately adjacent to the community of Quartz Hill, an affluent residential area dominated by the recent construction of single-family detached and attached home subdivisions. This pattern of growth is likely to continue into the future. In this regard, a 2007 listing of proposed projects prepared by Overland Traffic Consultants indicated that there were over 75 projects under consideration with a total capacity approaching 9,800 units within a two-mile radius of the Project site. Allowing for an average household size of 3.0 persons per unit,⁶ the residential inventory under consideration could accommodate over 29,000 new residents.

As presently conceived the proposed Project would offer 395,355 square feet of Gross Leasable Area (GLA)⁷, of which 390,355 square feet GLA would be allocated for retail and related uses. The center would be anchored by: (1) a Target Department Store with 149,362

⁶ According to the 2000 U.S. Census, the average size of owner-occupied homes in Lancaster was 3.01 persons.

⁷ For purposes of this study the Project's Gross Floor Area is used to represent the total Gross Leasable Area (GLA), which may overstate the actual GLA by two or three percent depending upon the final configuration. This overstatement, however, is not considered material to the analysis.

square feet GLA; and (2) a major home improvement center with 160,221 square feet GLA. Together, these two retailers would occupy over 78 percent of the center's leasable space. For purposes of this analysis, the Target's square footage has been allocated to various retail and other uses as follows: General Merchandise, 107,145 square feet GLA; Building Materials and Garden Supplies, 10,817 square feet GLA; Food/Beverage facilities, 27,000 square feet GLA; Drug Store, 1,600 square feet GLA; and Non-Retail Services, 2,800 square feet GLA. In addition to the home improvement center noted above, the balance of the space would be allocated for the following uses: a free-standing drug store, 17,272 square feet GLA; various retail shops whose occupants have not been identified to date, 47,500 square feet GLA; Eating and Drinking facilities, 16,000 square feet GLA; and a financial institution with 5,000 square feet GLA. The proposed center layout is shown in Figure 2 below.

Figure 2.
Conceptual Site Plan

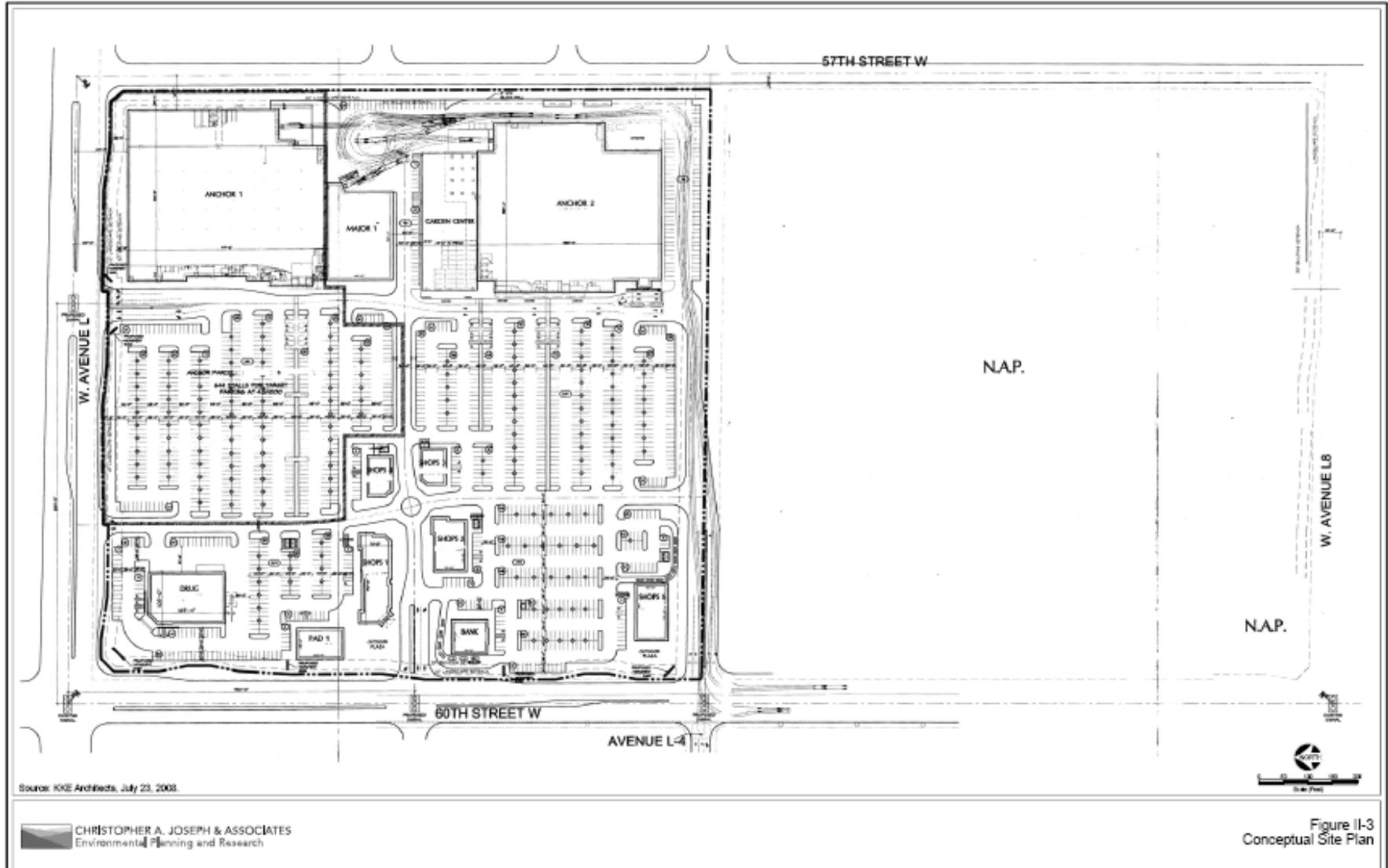


Figure II-3
Conceptual Site Plan

The Project is proposed to be constructed in one phase, with its first full calendar year of operations proposed for 2012. For purposes of this analysis the proposed space has been delineated into five major retail classifications as shown in Table 4 below, together with projections of the expected sales volume per square foot of GLA for each type of space and the expected annual sales volume expressed in 2007 constant dollars. The projected sales per square foot standards utilized in the table and at other places in this Report are based upon published industry reports such as The Urban Land Institute's (ULI) *Dollars & Cents of Shopping Centers* biennial reports, discussions with other retail shopping center advisors, and HR&A/W&W expert opinion of the market potential at the site and the unique conditions represented by the Antelope Valley region.

Table 4
PROJECTED DISTRIBUTION OF SPACE AND TOTAL SALES BY MAJOR RETAIL CATEGORY
LANE RANCH TOWNE CENTER
(in Square Feet of Gross Leasable Area)

Retail Space Category	Square Feet GLA 1/	Projected Sales 3/ per Sq Ft GLA	Projected Annual Sales
1. Shopper Goods (GAFO) 2/ General Merchandise (incl Department Stores) Non-Specified GAFO Space	107,145 47,500	\$ 350 \$ 350	\$ 37,500,750 \$ 16,625,000
Subtotal	154,645		54,125,750
2. Building Materials/Garden Supplies	171,038	\$ 250	\$ 42,759,500
3. Convenience Goods: Food/Beverage Facilities	27,000	\$ 500	\$ 13,500,000
4. Convenience Goods: Drug Stores (Including Pharmacies)	18,872	\$ 650	\$ 12,266,800
5. Eating & Drinking Facilities	16,000	\$ 500	\$ 8,000,000
Subtotal, Retail/Restaurant Space	387,555		\$ 130,652,050
6. Non-Retail Space (Business and Personal Services, et al)	7,800		-
Total Space	395,355		\$ 130,652,050

1/ GLA: Gross Leasable Area.

2/ GAFO: Acronym for General Merchandise, Apparel, Furniture/Furnishings, Other (Specialty) Goods. It should be noted that for purposes of this analysis the GLA of Target has been distributed as follows: General Merchandise, 107,145 square feet; Garden Supplies, 10,817 square feet; Food, 27,000 square feet; and Drugs, 1,600 square feet; Non-Retail Services, 2,800 square feet.

3/ Sales expressed in 2007 Constant Dollars

Source: Lane Ranch LLC; HR&A Advisors, Inc.; W & W, Inc.

A more detailed description of the proposed space in the Project is provided below:

- **Shopper Goods.** About 39 percent of the proposed space in the Project, or 154,645 square feet GLA, is to be allocated for “Shopper Goods.” Also referred to by the acronym “GAFO” or “Comparison Goods,” this type of retail activity is the staple of regional and large community shopping centers, as department stores and in-line retail stores selling Shopper Goods typically constitute the vast majority of the total occupied space. By definition, Shopper Goods encompass four types of retail stores:⁸ **G**eneral merchandise stores (most commonly, department stores); **A**pparel and accessories stores; **F**urniture, home furnishings, appliance and related stores; and “**O**ther” or specialty retail stores, encompassing a diverse array of retail shops selling such items as gifts, art goods, sporting goods, florists, photographic equipment, musical instruments, stationery, books,

⁸ The definition of “Shopper Goods” generally follows the retail store classification system utilized by the State of California Board of Equalization.

jewelry, and office and school supplies. Shopper Goods derive their name from shopper behavior commonly related to their purchase. Characteristically, given the level of expenditure and the diversity of product choice involved, shoppers will normally travel a further distance to compare prices and consider a range of alternative goods as part of the shopper goods purchase decision than they will for convenience goods such as food and drugs which are generally cheaper in price and frequently bought from the nearest available seller.

The Shopper Goods space in the Project is presently comprised of a portion of the Target Department Store with 107,145 square feet GLA (out of its total 149,362 square feet of GLA and an allocation of 47,500 square feet GLA of non-specified GAFO space for tenants to be identified in the future.

- ***Building Materials and Garden Supplies.*** A total of 171,038 square feet GLA will be occupied by this retail use, including 160,221 square feet GLA at the home improvement center and 10,867 square feet at the Target's garden center.
- ***Convenience Goods.*** Convenience goods refer to those retail goods that are required to meet day-to-day living needs, such as food, drugs and sundries, which are purchased from locations conveniently located adjacent to residential development. Convenience goods retail space in the Project includes a proposed free-standing drug store with 17,272 square feet GLA on a separate pad; an allocation of 1,600 square feet GLA for a pharmacy within the Target; and an additional allocation of 27,000 square feet GLA for Food/Beverage goods in the Target.
- ***Eating and Drinking Facilities.*** This use category will constitute a net addition of 16,000 square feet GLA, equivalent to about four percent of the total space in the Project. While some eating and drinking facility patronage will likely come from customers who are visiting other stores at the Project, it is likely that the major source of support for eating and drinking facilities will be the local residents living in the PMA.

C. Economic Impacts

The "economic impact" of the Project is the incremental difference that its construction and occupancy will make to the number of people employed, employee compensation earned (i.e., wages and benefits), and the resulting circulation of dollars through the local economy. Using a well-established input-output model and detailed data on the structure of the Los Angeles County economy, estimates were made of the Project's economic impact. The estimates include the "direct" effects of the project (i.e., the development-related expenditures and annual occupancy of the Project once it is completed), as well as the "multiplier effect" from the circulation of these direct expenditures within the County economy.

The economic impact projections were made for the County economy, rather than the City of Lancaster, because the County is the scale of geography that best captures the transactional flows among and between all the industry sectors that together define a local economy. Nearly all of the direct impacts, many of the indirect impacts and some of the induced impacts will, however, occur in the City economy.

The projected economic impacts of the Project are presented in Chapter II.

D. Fiscal Impacts

In addition to the general economic impacts on the County economy, the \$55.4 million investment in developing the Project, and its annual operation once it is completed and occupied, will also generate various tax and other revenues for the City, County, local school districts, the State of California and a variety of other governmental agencies. This analysis focuses on the revenues that will accrue to the City of Lancaster.

As with the Project's general economic impacts, the development-related tax revenues will be a one-time event, whereas the completed Project, once it is occupied will generate new annual revenues to the City. These revenues result from a variety of taxes, some of which are unique to the City and therefore accrue entirely to the City (e.g., business license tax). Other revenues are shared between the City and other taxing entities (e.g., property tax and sales tax revenues that are shared with the County and State).

The tax revenue estimates are based primarily on the first round of Project-related spending only — i.e., the tax revenues derived directly from Project construction and annual Project operation. Secondary and tertiary sources of tax revenue will also be generated as a result of indirect and induced economic activity that result from expenditures for Project construction and household spending, but the amounts of these additional revenues, and the degree to which they will accrue to the City, are not susceptible to reliable estimation. Therefore, the estimates presented here understate, to some unknown degree, the actual tax revenues that the Project will produce for the City.

The projected fiscal impacts of the Project are presented in Chapter III.

E. The “Urban Decay” Concept in Environmental Impact Analysis

When a proposed development project is subject to CEQA, both direct and indirect (or “secondary”) impacts of the project on the physical environment must be analyzed.⁹ Economic and social impacts of a project, though they may be included in a CEQA document, are not to be treated as “significant” impacts on the physical environment,¹⁰ as defined.¹¹ To the extent that there is a direct or indirect causal connection between a change in economic or social circumstances and a change in the physical environment, the economic or social change may be used to establish whether the physical change is “significant.”¹²

⁹ CEQA Guidelines § 15358.

¹⁰ CEQA Guidelines §§ 15064 and 15382.

¹¹ “A substantial or potentially substantial adverse change in the environment.” (Public Resources Code § 21068). The focus on physical changes in the environment is further reinforced by §§ 21100 and 21151.

¹² See, in general, CEQA Guidelines §§ 15131(a) and (b), and their associated discussion section.

With this statutory and interpretive guidance in mind, the courts have recognized that there is a potential for a proposed new retail development to trigger economic competition with existing retailers in the project's host community. If existing retailers are adversely affected by this competition, declines in sales could directly result in and/or lead to disinvestment, business closures, abandonment and other forms of physical deterioration that are indicative of "urban decay." If the severity of this change in physical circumstances is so substantial that it adversely affects appropriate use of the area or otherwise threatens the public health, safety or general welfare, this situation may cross a threshold that defines a "significant impact" under CEQA, such that mitigation capable of reducing the impact on that physical environment must be considered.

Thus, for urban decay to be an issue within the meaning of CEQA, there must first be an adverse economic circumstance that is likely to be caused by a proposed project. If such an adverse effect is identified, then the severity of this economic impact must be evaluated for its potential to cause a significant change in the physical environment (i.e., "decay"). Accordingly, this report presents an assessment of whether the proposed Project's retail uses could reasonably be projected to cause adverse economic circumstances in the surrounding market areas that could be traceable to the Project's improvements. Only to the degree that such adverse circumstances can be predicted reasonably is there any need to evaluate the potential to cause "decay" or other significant physical changes in the environment.

Chapter IV of this report presents an analytic framework for assessing whether the Project's development could cause adverse economic impacts on the surrounding retail market area, and then applies this framework to the specific retail components of the Project's improvements and their respective market areas. Appendix C includes further details on the data sources and projections used in this analysis.

II. ECONOMIC IMPACTS ANALYSIS

A. Overview of the Economic Impact Analysis Approach

As noted in Chapter I, the "economic impact" of the Project is the incremental difference that its construction and occupancy will make to the number of people employed, employee compensation earned (i.e., wages and benefits), and the resulting circulation of dollars through the local economy. Using the well-established IMPLAN input-output model and detailed data on the structure of the Los Angeles County economy, estimates were made of the Project's economic impact. The estimates include the "direct" effects of the project (i.e., the development-related expenditures and annual occupancy of the Project once it is completed), as well as the "multiplier effect" from the circulation of these direct expenditures within the County economy.

Employment and other economic impacts related to the development of the Project and its annual operation once it is completed were estimated using the IMPLAN input-output model of the Los Angeles County economy as of 2007, which is the most recent year for which model data were available at the time this analysis was prepared. Input-output analysis is an economic impact modeling method for understanding the interactions among the industries in a local economy that result from investment in a new capital project or other changes. In form, it resembles a giant matrix, or spreadsheet, in which the "inflows" of goods and services needed by an industry (i.e., the purchasing sectors) are the columns, and the rows consist of the outputs or selling sectors. This enables analysis of the specific sectors of an area's economy that are affected, and by how much, when a dollar's worth of investment, new employment, or other measure of "final demand" is added to a particular sector or sectors. These inter-industry relationships can be expressed in terms of dollar impacts or employment impacts.

IMPLAN¹³ is a widely accepted model that the consultant team and many others, including public agencies, have used to estimate the economic consequences of new investment in, or other changes to, a local or regional economy.¹⁴ It explicitly accounts for impact leakage, or the fact that not all economic impacts are necessarily experienced inside the geographic area or site under study. The IMPLAN model can be used to generate estimates of direct, indirect and induced employment, compensation (i.e., wages and benefits), and total economic output (i.e., a summary measure of all spending and economic activity), for both the construction and operations phases of a project, on an annual basis. In this analysis, all economic impact dollar amounts are expressed in constant 2008 dollars (i.e., without the effects of inflation over time). "Employment" includes full-time and part-time jobs, regardless of whether they are permanent or temporary.

¹³ IMPLAN (IMPact Analysis for PLANning), a social accounting and impact analysis software program, was developed in 1979 by the U.S. Forest Service in cooperation with the Federal Emergency Management Agency and the U.S. Bureau of Land Management to assist the Forest Service in land and resource planning and management. The IMPLAN accounts closely follow the accounting conventions established for the U.S. economy and the rectangular format recommended by the United Nations.

¹⁴ HR&A has previously used IMPLAN to analyze the economic impacts of a wide range of projects throughout southern California and elsewhere in the nation, including large residential developments, high-rise office buildings, industrial projects, shopping centers, university buildings, and film and television studio campus expansions.

Direct impacts include the investment in Project construction, and annual retail sales. The direct impacts occur primarily in the City of Lancaster. Indirect impacts are those resulting from purchases of goods and services to support Project construction and retail businesses and eating and drinking facilities. These impacts, too, may occur in the City of Lancaster or elsewhere in the County. Induced impacts result when direct and indirect employees (related to both construction expenditures and Project retail and dining operations) spend their compensation on consumer and other household-related goods and services. Some of these expenditures may also occur in the City, but most will occur elsewhere in the County, since only some direct and indirect employees will reside in the City. The indirect and induced effects are together sometimes referred to as the “multiplier effect” of the direct expenditures associated with a development project.

B. Economic Impacts of Project Development

Direct construction-related employment, compensation, and total economic impact were derived from the IMPLAN model based on a hard construction cost estimate of \$55.4 million provided by the Applicant. These are, essentially, one-time impacts that occur incrementally over the months of Project construction. The construction impacts are summarized in Table 5. It shows that the planned private investment of \$55.4 million to construct the Project translates to a total economic output impact of about \$95.6 million (in 2008 \$) in the Los Angeles County economy. The investment is associated with 626 full-time and part-time jobs in the County economy, of which 373 will be involved directly in the Project’s construction in the City. Compensation paid to workers whose job is supported by the development investment will total \$30.2 million, including \$18.3 million for those directly involved in its construction. Attachment B-1 provides the sector-by-sector distribution of these impacts in the County economy.

Table 5
 EMPLOYMENT AND OTHER ECONOMIC IMPACTS IN LOS ANGELES COUNTY FROM
 CONSTRUCTION OF THE LANE RANCH TOWNE CENTER
 (all dollar amounts in 2007 \$)

<u>Impact Category</u>	<u>Direct Impact</u>	<u>Indirect Impact</u>	<u>Induced Impact</u>	<u>Total Impact¹</u>
Employment				
Construction	372.9	-	-	372.9
Other	-	105.8	147.5	253.3
Total ¹	372.9	105.8	147.5	626.2
Employee Compensation	\$18.3 million	\$5.7 million	\$6.2 million	\$30.2 million
Total Economic Output	\$55.4 million	\$18.9 million	\$21.4 million	\$95.6 million

¹ Totals may not sum precisely due to independent rounding.

Source: HR&A, Inc.

C. Economic Impacts of Annual Operations

The economic impacts of the Project once it is completed were also derived from the IMPLAN model. The model’s results are based on the estimated \$130.7 million in annual sales (in 2007 dollars) by retail and dining facility type. Retail sales are adjusted to remove cost of goods sold. The IMPLAN model was then applied to estimate how these annual sales translate into direct, indirect, induced, and total employment, compensation and economic output impacts in the County economy. These impacts are summarized in Table 6. It shows that annual operation of the completed Project will result in a total economic output impact of about \$74.7 million (in 2008 dollars) in the County economy,¹⁵ and total compensation paid to workers will be about \$25.8 million, including \$16.2 million paid to workers at the Project site. The total employment impact in the County economy that is associated with this scale of Project sales is 815 full-time and part-time jobs, including 625 jobs at the Project site. Attachment B-2 provides the sector-by-sector distribution of these impacts in the County economy.

Table 6
 EMPLOYMENT AND OTHER ECONOMIC IMPACTS IN LOS ANGELES COUNTY FROM
 ANNUAL OPERATION OF THE LANE RANCH TOWNE CENTER
 (all dollar amounts in 2007 \$)

<u>Impact Category</u>	<u>Direct Impact</u>	<u>Indirect Impact</u>	<u>Induced Impact</u>	<u>Total Impact¹</u>
Employment	625	83	107	815
Compensation	\$16.2 million	\$4.6 million	\$5.1 million	\$25.8 million
Total Economic Output	\$41.9 million	\$15.2 million	\$17.6 million	\$74.7 million

¹ Totals may not sum precisely due to independent rounding.

Source: HR&A, Inc.

¹⁵ The total economic impact is less than total projected sales, because the economic impacts are based only on the gross margin to the retailer (i.e., total sales price minus production costs, such as manufacturing, transportation, warehousing).

III. FISCAL IMPACTS ANALYSIS

A. Overview of the Fiscal Impact Analysis Approach

In addition to the general economic impacts on the County economy, the \$55.4 million investment in developing the Project and its annual operation once it is completed and occupied will also generate various tax and other revenues for the City, County, local school districts, the State of California and a variety of other governmental agencies. This analysis focuses on the municipal revenues that will accrue to the City of Lancaster.

As with the Project's general economic impacts, the development-related tax revenues will be a one-time event, whereas the completed Project, once it is occupied, will generate new annual revenues to the City. These revenues result from a variety of taxes, some of which are unique to the City and therefore accrue entirely to the City (e.g., business license tax). Other revenues are shared between the City and other taxing entities (e.g., property tax and sales tax revenues that are shared with the County and State).

B. One-Time Project Revenues

The City will receive one-time revenues due to purchase of the Project site and purchase of certain construction materials. If the construction site is properly designated as a point-of-sale location, it is estimated that the Project will generate \$138,374 (in 2008 \$) in sales tax on purchase of some construction materials. The City already received \$4,410 in real estate transfer tax on the purchase of the site by the Project Applicant. The basis for these one-time revenue estimates is shown in Table 7.

Table 7
 ESTIMATE OF ONE-TIME TAX REVENUES
 TO THE CITY OF LANCASTER FROM CONSTRUCTION
 OF THE LANE RANCH TOWNE CENTER
 (all dollar values in 2008 \$)

Sales Tax on Construction Materials		
Project S.F. GLA ¹		395,355
Hard Cost per S.F. GLA ¹	\$	140.00
Hard Construction Cost	\$	55,349,700
Materials Share		50.0%
Materials Amount	\$	27,674,850
Materials Share Subject to Sales Tax		50.0%
Amount Subject to Sales Tax	\$	13,837,425
Tax Rate ²		1.0%
Tax Revenue to Lancaster	\$	138,374
Real Estate Transfer Tax		
Site Purchase Price ¹	\$	7,350,750
Tax Rate		0.06%
Tax Revenue to Lancaster	\$	4,410
Total One-Time Tax Revenue	\$	142,784

¹ Per Project Applicant.

² Assumes contractor takes out sub-permit designating site as point of sale.

Includes 0.75% local sales tax plus 0.25% sales tax rebated as property tax.

Source: HR&A, Inc.

Although the Project will also generate planning and construction permit fees, these fees are generally set at levels that are intended to directly offset City staff time to process them, and therefore they do not represent net new revenue to the City. Similarly, any Project payments for the estimated cost of traffic and other environmental mitigation are excluded, because they are also set at levels to directly offset Project impacts, and therefore do not represent net new revenue to the City.

C. Recurring Annual Project Revenues

Once the Project is completed and occupied, the City will receive annual revenues of about \$1.4 million in the first full year of operation (2012) from its shares of the property taxes, sales taxes, and business license taxes, as shown in Table 8. Each tax revenue category utilizes a different estimation approach, which is briefly described below.

Table 8
 ESTIMATE OF RECURRING ANNUAL TAX REVENUES
 TO THE CITY OF LANCASTER FROM OPERATION
 OF THE LANE RANCH TOWNE CENTER, 2012

Property Tax	\$	41,478
In Lieu MVLFF	\$	80,914
Sales Tax	\$	1,290,628
Business License Tax	\$	<u>1,802</u>
Total Recurring Revenues	\$	1,414,822

Source: HR&A, Inc.

1. Property Tax Estimate

The property tax applicable to the Project site includes a one percent levy on the assessed value of land and buildings, which is distributed among 26 different local public agency accounts, plus a proportional share of voter-approved indebtedness (calculated as a percentage of assessed value) and direct assessments (calculated according to a formula established by each agency imposing the assessment). It is assumed in this analysis that the Project’s assessed value, and therefore the basis for the one percent general levy and the share of indebtedness, is equal to the construction cost (\$55.4 million), which then increases a maximum of two percent per year under Proposition 13, until sold. The City receives about 6.6 percent¹⁶ of the one percent general levy for general governmental purposes in this part of the City, plus additional sums for voter-approved indebtedness and special assessments. The current assessed value of the Project site is \$112,000.¹⁷ The City’s current share of the one percent general levy is \$80.

As shown in Table 9, the City’s net share of the one percent general levy will total \$41,478 in 2012, after accounting for property tax revenue from existing uses at the Project site.

¹⁶ 6.6107188%, for Tax Rate Area 02432, per the Los Angeles County Assessor.

¹⁷ Los Angeles County Assessor data provided by First American CoreLogic, Inc., for APN 3102-027-036, for 2006-07.

Table 9

ESTIMATE OF RECURRING ANNUAL PROPERTY TAX REVENUES, 2012

Construction Cost (2008 \$) ¹	\$ 55,349,700
Annual Construction Cost Inflation	2.50%
Construction Cost (2012 \$)	\$ 62,623,105
1% General Levy	626,231
City's Share of 1% Levy ²	6.610718800%
City's Tax Revenue	\$ 41,398
Less Existing Tax	
Assessed Value (2008 \$) ³	\$ 111,871
Annual AV Inflation ²	1.50%
Assessed Value (2012 \$)	\$ 120,517
1% General Levy	1,205
City's Share of 1% Levy ³	6.610718800%
City's Tax Revenue	\$ (80)
Net Tax Revenue to City	41,478

¹ From Table 7.

² HR&A assumptions, considering recession impacts.

³ Per Los Angeles County Assessor, 2008.

Source: HR&A, Inc.

2. In Lieu Motor Vehicle License Fee Revenue

Beginning in 2005, the State reduced the Motor Vehicle License Fee from two percent to 0.65%. The State kept local government revenues whole by swapping the lost Motor Vehicle License Fee revenue for an equivalent amount of property tax revenue. In the City of Lancaster, the rebate is equal to approximately 0.124% of citywide assessed valuation. Applying this rate to the Project's assessed value, the Project will yield about \$77,772 in 2012.

Table 9A

**ESTIMATE OF RECURRING ANNUAL IN LIEU MOTOR VEHICLE
LICENSE FEE REVENUE, 2012
THE LANE RANCH TOWNE CENTER**

Construction Cost (2012 \$) = Assessed Value	\$ 62,623,105
Fiscal Yr. 2007-2008 Prop. Tax In Lieu of VLF	\$14,565,050
Fiscal Yr. 2007-2008 Citywide Assessed Value	\$11,727,911,000
Factor of Assessed Valuation ¹	0.124%
Total Recurring Revenues	\$77,772

¹ City Property Tax In Lieu of VLF Fees as a Percent of City Assessed Valuation

Source: HR&A, Inc.

3. Sales Tax Revenue

The City receives one percent¹⁸ out of the 9.25 percent tax applicable to retail and certain other sales within the City limits that are subject to the State sales and use tax. The balance of the tax goes to the County and the State of California.

The sales tax revenue estimate for Project is based on taxable sales from each type of store planned for the Project. Most of these sales, with the exception of groceries and pharmacy items, are all subject to the sales tax. Only about 40 percent of grocery sales and 36 percent of pharmacy sales are subject to sales tax.¹⁹ As shown in Table 10, total annual sales at the Project are projected to equal about \$130.7 million using 2007 sales per square foot values for each tenant category. Using sales per square foot growth factors that reflect the current recession and current forecasts for recovery beginning in 2010, sales in 2012 would total \$143.7 million. This translates to about \$1.2 million in sales tax revenue to the City in 2012, assuming all space in the project is occupied and no sales are transferred from or otherwise reduced at other retailers located in the City as a consequence of opening the Project.

Table 10
ESTIMATE OF RECURRING ANNUAL SALES TAX REVENUES

<u>Retail Space Category</u>	Square Feet GLA	2007 Projected Sales per Sq Ft GLA	2007 Projected Annual Sales	% Taxable	2007 Taxable \$	1% City Tax, 2007 \$	City Tax, 2012 \$
General Merchandise (incl Department Stores)	107,145	\$350	\$ 37,500,750	100.0%	\$ 37,500,750	\$ 375,008	\$ 412,543
Non-Specified GAFO Space	47,500	\$350	\$ 16,625,000	100.0%	\$ 16,625,000	\$ 166,250	\$ 176,876
Subtotal	154,645		\$ 54,125,750		\$ 54,125,750	\$ 541,258	\$ 589,419
Building Materials/Garden Supplies	171,038	\$250	\$ 42,759,500	100.0%	\$ 42,759,500	\$ 427,595	\$ 441,278
Convenience Goods							
Food/Beverage	27,000	\$500	\$ 13,500,000	39.5%	\$ 5,332,500	\$ 53,325	\$ 53,325
Drug Stores (incl Pharmacies)	18,872	\$650	\$ 12,266,800	36.3%	\$ 4,452,848	\$ 44,528	\$ 44,528
Subtotal	45,872		\$ 25,766,800		\$ 9,785,348	\$ 97,853	\$ 97,853
Eating & Drinking	16,000	\$500	\$ 8,000,000	100.0%	\$ 8,000,000	\$ 80,000	\$ 80,000
Non-Retail Space (specifics unknown)	7,800	\$0	\$ -	0.0%	\$ -	\$ -	\$ -
Subtotal, Retail Space	395,355		\$ 130,652,050		\$ 114,670,598	\$ 1,146,706	\$ 1,208,551

¹⁸ Assumes annual sales growth from 2007 is as follows: 3.4% in 2008, -1.2% in 2009, 1.8% in 2010, 2.5% in 2011; and 3.2% in 2012, per March 2009 UCLA Forecast for consumer prices.

Source: HR&A, Inc.; W&W, Inc.

4. Business License Tax Revenue

The City currently collects an annual tax on the number of employees in each business. The current tax rate varies from \$86 to \$182, plus a new application (\$64) or annual renewal processing fee (\$23). Assuming the Project includes three tenants with less than 26 employees, three tenants with 26-50 employees, one tenant with 51-75 employees, and two tenants with more than 75 employees, and that the current tax rates increase three percent per year, the total recurring business license fee revenue in 2012 would be \$1,802.

¹⁸ Under recent changes in State law enacted to finance the State's structural deficit, 0.75% is remitted to the City as sales tax revenue and another 0.25% is remitted as additional property tax. For calculation convenience this analysis treats the entire one percent as sales tax revenue.

¹⁹ Based on the ratios of "County Baseline" to "County Adjusted" in Appendix C, Table C-8.

5. 20-Year Tax Revenue Projection

Assuming that all of the taxes that now apply to commercial projects in Lancaster will remain in place over a 20-year period following Project completion, these revenues are projected to total \$40.1 million in nominal dollars (i.e., including inflation),²⁰ or \$12.0 million in constant 2008 dollars (without inflation),²¹ as shown in Table 11.

Table 11
ESTIMATE OF RECURRING ANNUAL TAX REVENUES
TO THE CITY OF LANCASTER FROM OPERATION
OF THE LANE RANCH TOWNE CENTER, OVER 20 YEARS

	<u>Nominal \$</u>	<u>2008 \$</u>
Property Tax	\$ 1,069,440	\$ 329,739
In Lieu MVLFF	\$ 2,005,232	\$ 618,271
Sales Tax	\$ 37,010,666	\$ 11,058,742
Business License Tax	<u>\$ 51,673</u>	<u>\$ 15,440</u>
Total Recurring Revenues	\$ 40,137,013	\$ 12,022,191

Source: HR&A, Inc.

D. **Public Service Costs and Net Fiscal Impact**

The net fiscal impacts of a proposed development project is calculated by subtracting any recurring costs to provide public services to the project from the tax and other revenues it generates. The net result depends entirely on how the accounting is performed, and whether “average” or “marginal” public service costs are used in the calculation.

In HR&A’s view, “marginal” (or incremental) rather than “average” costs should be the basis for estimating public service costs for a development like the proposed Project. The marginal cost approach examines the degree to which a project’s service demands can be accommodated by existing service capacities, or would cause the need for an expansion of capacity. On the other hand, it does not account for the sunk (i.e., already expended) cost of producing any existing surplus service capacity, nor the opportunity cost when a project uses up existing service capacity that will then no longer be available to a future project. The marginal cost approach also ignores costs for services that historically do not actually change as each new project is developed. It is, however, more consistent with the way traffic and other environmental impacts, are calculated. In HR&A’s experience, the average cost approach is better suited to analysis of large-scale, long-term public investment decisions, such as the fiscal impacts of alternative General Plan buildout scenarios or annexations of large land areas.

²⁰ Assumes 3% annual inflation in retail sales and the business license tax rate, and 2% per year in assessed value.

²¹ The discount rate used in the constant dollar calculation is equal to the unleveraged internal rate of return (9.49%) for regional shopping malls in Los Angeles County as of the first quarter of 2009, per Real Estate Research Council, Real Estate Report, Spring 2009.

According to the Project's EIR, the County Fire District and County Sheriff have sufficient capacity to serve the Project at current levels of service.²² The EIR also concluded that the Project will not burden existing capacities of the water, electricity, wastewater, stormwater or solid waste systems serving the City.²³

The Project's EIR includes, however, a number of mitigation measures that reflect existing legal requirements and/or good planning principles that will limit Project impacts on the demand for public safety services (i.e., police, fire and emergency medical and parks and recreation). Thus, the completed Project is not expected to produce any marginal (or "incremental") public service costs that would need to be netted against Project revenues to yield the net fiscal impact of the Project on the City. Therefore, the Project's tax revenue yield of about \$1.4 million in 2012 is also its net fiscal impact.

Although public school facilities are not the responsibility of the City, potential impacts on the Westside Union School District and Antelope Valley Union High School District were also reviewed in the EIR.²⁴ The EIR found that the Project would generate a need for 24 additional student seats. The Project will be required, nevertheless, to pay a school facilities impact fee of \$166,049 to the District,²⁵ which would fully mitigate potential school impacts under applicable law.

²² Christopher A. Joseph & Assoc., Draft EIR, *The Lane Ranch Towne Center Project*, January 2009, Sections IV.M.1. (Fire); IV.M.2. (Police).

²³ *Id.*, Section IV.O. (Utilities).

²⁴ *Id.*, Section IV.M.3. (Schools).

²⁵ 395,355 square feet x \$0.42/square foot = \$166,049.

IV. URBAN DECAY ANALYSIS

A. Overview of the Urban Decay Analysis Approach

The urban decay analysis measures the degree to which the construction and operation of the Project could result in a significant adverse economic impact on existing and proposed retail developments in the same market area. Methodologically, any such impact is identified and measured by assessing the degree to which the amount of space planned for development in each of the Project's retail and dining use categories would *exceed* the anticipated increase in the supportable amount of retail and dining space that can be projected to occur, based upon the anticipated growth in future customer demand for comparable retail and dining activities in a defined market area.

If the amount of retail and dining space planned for the Project *is less than or equal to* the amount of retail and dining space that can be supported by projected future demand, it can be concluded that the scale of potential customer demand is sufficiently large that it can support both the Project and all other existing and planned space proposed for those same general categories of retail use. There would be no need, therefore, to further evaluate the potential for urban decay associated with the Project.

Conversely, if the proposed supply exceeds the anticipated growth in demand, it could be argued that the Project would attract sales away from other existing or planned new retail and dining establishments of the same type. Such a finding of potential sales transfer, in turn, requires further investigation to assess whether it is foreseeable that this potential attraction of sales away from existing retail and dining businesses could result in disinvestment, business closures, store abandonment, and/or other forms of physical deterioration that are effectively indicators of "urban decay." Such additional investigation would include, for example, determining whether the exceedance concerns an anchor store whose fate is more central to the financial survival of the adjacent retail; the likelihood that stores suffering from significant competition caused by a new project can be reused for other retail or non-retail uses; and/or whether the competition is between stores of the same national retail brand, which may be willing to absorb short-term losses to gain local market share.

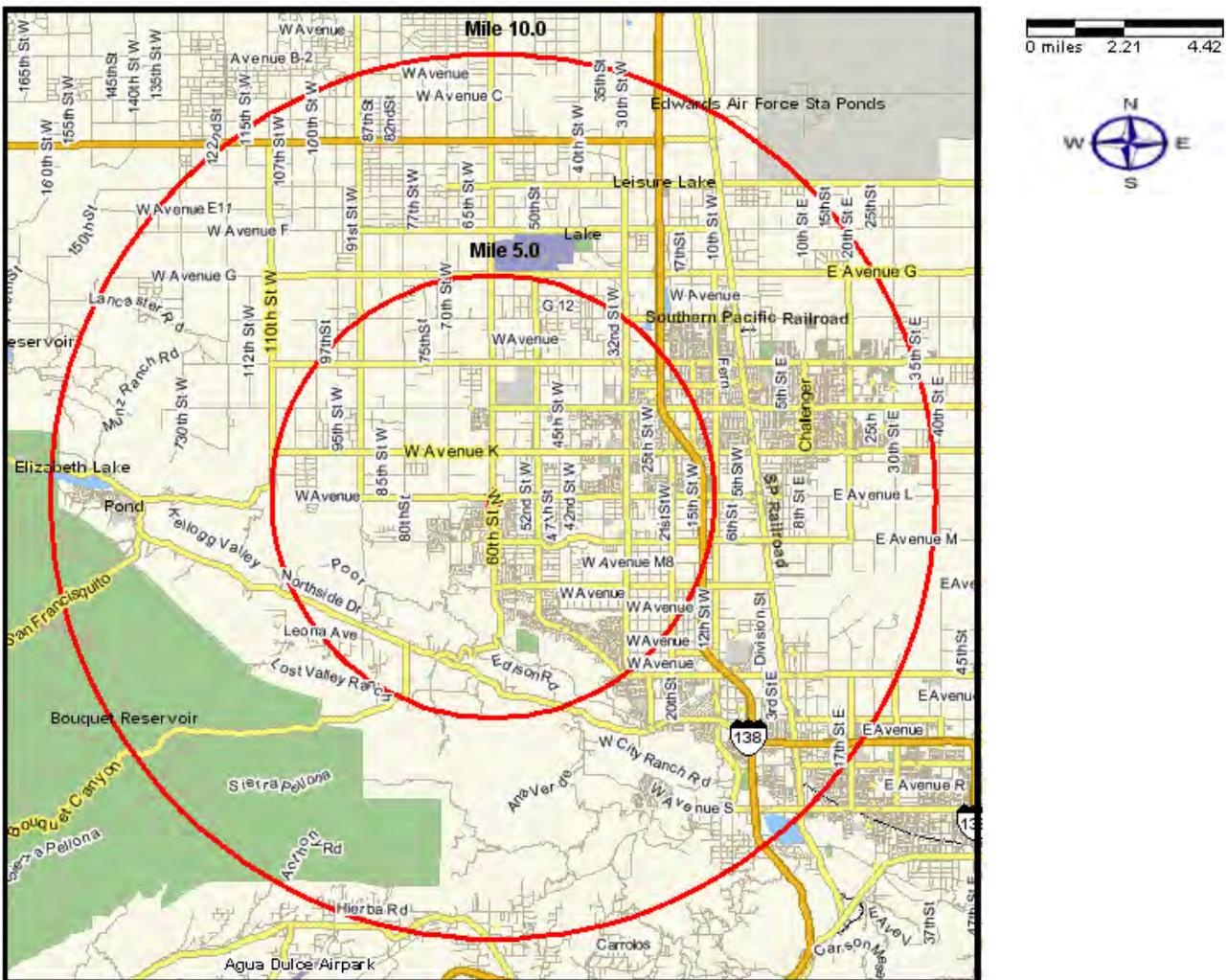
Making these economic impact measurements typically requires: (1) establishing logical market areas appropriate for each retail and dining category for which future retail space will be provided by the Project; (2) projecting the likely increase in customer demand based on population growth, income growth and spending patterns for particular categories of retail goods and eating and drinking facilities over a relevant time period (in this analysis, 2007-2012); (3) converting the projected changes in future customer demand to amounts of supportable retail and dining space measured in square feet GLA, and (4) making a comparison of the projected change in demand in the form of supportable space with the change in supply as represented by the increase in GLA proposed for the Project and other developments in the relevant market area(s).

Following this methodology, separate market impact analyses were conducted for the principal types of retail and related space that are to be included in the Project.

B. Market Area Delineation

Given the proposed scale of the Project, the unique geography and development patterns of the Antelope Valley and the location of existing and proposed competitive retail facilities, two market areas were established in order to evaluate the potential for Shopper Goods Space: (1) a *Primary Market Area* (PMA), defined geographically as the land area contained within a circle having a 5-mile radius whose center is the intersection of 60th Street West and West Avenue L; and (2) a *Secondary Market Area* (SMA), represented by a circular ring around the PMA extending from five to 10 miles from the intersection of 60th Street West and West Avenue L. The two market areas are shown in Figure 3.

Figure 3: Lancaster Shopping Center Primary Market Area (PMA) and Secondary Market Area (SMA)



Source: Claritas

The basic demographic characteristics of the two market areas are shown in Table 12. According to Claritas, Inc., a well-accepted third party demographic data source, the 2007 population in the PMA is estimated at 89,188 persons; by 2012 it is expected to increase by 13,245 residents to 102,433 persons. In comparison, the 2007 SMA population is estimated by Claritas to be 147,727 persons; by 2012 it is projected to reach 165,744 persons, realizing a net growth of 18,017 residents. Table 12 also shows for each market area the projected increase in average per capita income for the period 2007 to 2012 and the resulting growth in Aggregate Income, a key indicator of the growth in retail sales potential. Over the five year forecasting period, Aggregate Income in the PMA is projected to increase by more than \$1.25 billion; for the SMA, the projected increase is expected to exceed \$1.21 billion. As the equivalent of one-third of personal income is typically allocated for retail sales, this increase in Aggregate Income should translate into \$682 million in additional annual retail sales generated by the combined market areas.

Table 12
 BASELINE DEMOGRAPHIC ESTIMATES AND PROJECTIONS
 LOS ANGELES COUNTY AND LANCASTER SHOPPING CENTER MARKET AREAS

<u>Data Category</u>	<u>Primary Market Area 0-5 Mile Radius</u>	<u>Secondary Market Area 5-10 Mile Ring</u>
Population		
2007	89,188	147,727
2012	<u>102,433</u>	<u>165,744</u>
Net Increase 2007-2012	13,245	18,017
Average Per Capita Income (per BEA definition) ^{1/}		
2007	\$ 44,288	\$ 28,777
2012	\$ 50,777	\$ 32,993
Aggregate Income		
2007	\$ 3,949,958,144	\$ 4,251,139,879
2012	<u>\$ 5,201,240,441</u>	<u>\$ 5,468,391,792</u>
Net Increase 2007-2012	\$ 1,251,282,297	\$ 1,217,251,913

^{1/} See Appendix C for explanation of Income definitions.

Source: Claritas, Inc.; United States Bureau of Economic Analysis (BEA); HR&A Advisors, Inc.; W & W, II

C. Existing and Projected Competitive Retail Supply

Within the PMA and SMA there are a number of existing shopping centers that will compete for Shopper Goods sales with the proposed Project, including three existing Target stores. Most of these competitive facilities have been placed at locations that are immediately adjacent to or visible from the Antelope Valley Freeway. The largest and most dominant existing retail facility in the region is the Antelope Valley Mall, with over one million square feet GLA offering 135 stores and major anchor tenants that include Dillard's, Sears, JC Penney, and a Cinemark 16-theater complex. The mall is located immediately west of the Antelope Valley Freeway at its interchange with Avenue P. However, it should be noted that the development has

lost one anchor store in recent months — Mervyn’s — and will see the closure of two Gottschalk’s outlets in the near future. The Antelope Valley Mall is located in the City of Palmdale within the Antelope Valley Freeway (S. R. 14/138) corridor on a site that is about six miles southeast of the Project site.

In addition to the existing supply of retail space, the Project will also likely compete with a proposed retail development to be located across the intersection of 60th Street West and West Avenue L on the northwest corner known as The Commons at Quartz Hill as well as with other developments proposed to be completed by 2012 in the PMA. As presently conceived, The Commons at Quartz Hill will have a total complement of 366,376 square feet GLA, and feature a Wal-Mart Superstore and a second major department store retailer as the anchor tenants. Like the Project, The Commons is scheduled to be in operation by 2012. A preliminary breakdown of the proposed space in The Commons by major retail category is shown in Table 13.

Table 13
PROPOSED THE COMMONS AT QUARTZ HILL RETAIL CENTER

Retail Space Category	Square Feet GLA 1/
Wal-Mart Superstore, including Garden Center	217,652
General Merchandise Retailer	89,911
Drug Store	14,820
Other Retail Stores	27,150
Eating & Drinking Facilities	11,343
Services	5,500
Total GLA	366,376

1/ GLA: Gross Leasable Area.

Source: Rothbart Development; HR&A Advisors, Inc.; W&W, Inc.

It should be noted that for purposes of this analysis the proposed 217,652 square feet of GLA within the Wal-Mart Superstore at The Commons has been allocated to the following space categories: (1) General Merchandise, 138,012 square feet GLA; (2) Building Materials/Garden Supplies, 21,624 square feet GLA; (3) Food/Beverage facilities, 45,736 square feet GLA; (4) Pharmacy, 744 square feet GLA; (5) Eating and Drinking facilities, 2,082 square feet GLA; and (6) Non-Retail Services, 9,454 square feet GLA.

In addition to The Commons, discussions with City of Lancaster Planning Department staff indicated that there were 12 additional projects with major retail components that were known to the City. These projects were likely to be entitled, constructed and operational by the year 2012. Together with Lane Ranch, these projects, listed in Table 14 along with a description of their basic characteristics, represent potential competitive retail space that will likely be developed over the analysis period 2007-2012.

Table 14
 INVENTORY OF POTENTIAL COMPETITIVE FACILITIES
 LANCASTER SHOPPING CENTERS PRIMARY MARKET AREA (PMA)
 2007-2012

<u>Center Identification/Location</u>	<u>Acres</u>	<u>Retail Square Feet</u>	<u>Allocation of Space</u>	<u>Status/Comments</u>
1 Neighborhood Shopping Center NW Corner, 40th Street W and West Avenue J	12.5	96,100	Supermarket: 53,000 Drug Store: 13,000 Miscellaneous Shops: 26,600 Fast Food Restaurant: 3,500	Undergoing entitlement process. Should be constructed and operational by 2012
2 Community Shopping Center NW Corner, 60th Street W and West Avenue K	22.3	38,920	<u>Phase I:</u> CVS Drug Store 13,225 Restaurants 8,997 Retail Shops 16,698 Subtotal 38,920 <u>Phase II:</u> Lowe's Home Imp Ctr: 139,410 Lowe's Garden Ctr: 31,659 Fast Food 7,215 Conv. Store w/ Car Wash: 2,700 Subtotal 180,984	Project currently undergoing entitlement. Phase I to be completed and operational in 2012. Phase II to be completed and operational in 2014. Upon completion, development will have 219,904 square feet of space.
3 Armagosa Creek Commercial District NE Corner, West Avenue L and 10th Street W	110+/-	1,100,000-1,500,000	Existing stores may relocate to project in its initial phases. No allocation of Development Area has been made public. Space not included as future competitive supply for the Project.	Specific Plan has been approved. As of April 2009 no development applications have been filed within this area. Potential space has not been considered in this analysis. To be constructed in four phases over a 10 year period. Located adjacent to eastern edge of PMA.
4 Lancaster Spectrum SW Corner, 20th Street W and West Avenue J-8	14.72	88,490	Retail 75,690 Restaurant 12,800	Mixed use project; plans for a hotel and fitness center have been approved, but no construction initiated as of April 2009.
5 Conditional Use Permit 05-10 NE Corner, 20th Street W and West Avenue J-12	9.72	35,228	Retail Building 1: 20,072 Retail Building 2: 10,156 Restaurant Building: 5,000	Approved mixed use development with hotel and office space. Total development area in permit is 103,422 square feet. Hotel and office space have been constructed.
6 Conditional Use Permit 06-02 SW Corner, 30th Street W and West Avenue K	4.4	36,300	Restaurants: 10,500 Miscellaneous: 25,800	Project approved in 2008; construction has not started as of April 2009.
7 Conditional Use Permit 06-05 NE Corner, 20th Street W and Antelope Valley Freeway (S. R. 14/138)	4.88	43,535	Retail Building 1: 20,000 Retail Building 2: 15,000 Misc. Retail/Rest 8,535	Project has been constructed and Office Depot has occupied one of the major retail buildings.
8 Conditional Use Permit 07-10 SE Corner, 30th Street W and West Avenue K	8.52	42,867	Food Store: 15,000 Drug Store: 17,272 Miscellaneous Retail Stores 10,595	Project has received approvals. Food store is reportedly moving forward, though no construction has been initiated as of April 2009. Remainder of development area reportedly on hold.
9 Site Plan Review 06-21 South side West Avenue L, westerly of 10th Street W	6.89	14,500	Miscellaneous Retail Stores 8,500 Restaurants: 6,000	Project has not been approved for development as of April 2009
10 Conditional Use Permit 07-11 NE Corner, 20th Street W and West Avenue K		43,494	CVS Drug Store: 15,789 Miscellaneous Retail Stores 17,105 Restaurants: 10,600	Project was approved for development in 2008; no construction initiated as of April 2009.
11 Conditional Use Permit 08-17 SE Corner, 15th Street W and West Avenue J		15,485	Rite Aid Drug Store: 15,485	Project has not been approved for development as of April 2009. Former service station site; may have soil remediation issues.
12 Site Plan Review 06-23 SE Corner 20th Street W and West Avenue J		13,000	Walgreens Drug Store 13,000	Project has been approved and is under construction as of April 2009.
Projected Total Retail and Related Space, 2012		467,919		

Source: City of Lancaster Planning Department; HR&A Advisors, Inc.; W&W, Inc.

Table 15 translates the inventory of proposed space presented in Table 14 into the major retail and eating and drinking categories evaluated in this analysis. Together, these projects represent a potential competitive supply of 467,919 square feet of GLA, of which 370,089 square feet GLA is considered likely to be allocated for retail and related uses that would compete with the Project in 2012.

Table 15
INVENTORY OF RETAIL AND RELATED SPACE, PROJECTED
COMPETITIVE FACILITIES IDENTIFIED IN TABLE 14

<u>Retail</u> <u>Space Category</u>	<u>Square Feet</u> <u>GLA 1/</u>	<u>Percent</u> <u>of Total</u>
Shopper Goods Space (GAFO)	124,186	27%
Building Materials and Garden Supplies	20,000	4%
Convenience Goods: Food/Beverage Stores	73,000	16%
Convenience Goods: Drug Stores	87,771	19%
Eating & Drinking Facilities: All Restaurants	65,132	14%
Subtotal, Competitive Retail Space	370,089	79%
Services/Other Uses	97,830	21%
Total	467,919	100%

1/ GLA: Gross Leasable Area.

Source: City of Lancaster; HR&A Advisors, Inc.; W&W, Inc.

Table 16 provides a summary of the proposed competitive supply of retail space used in the analysis by major space category. The total retail and other space that would be added to the PMA by 2012 are projected at 1,229,650 square feet GLA. The Project's 395,355 square feet GLA of space represents about 32.2% of the projected addition to future competitive supply in the PMA.

Table 16
PROJECTED INCREASE IN SUPPLY OF COMPETITIVE RETAIL SPACE
LANCASTER PRIMARY MARKET AREA (PMA)
2007-2012
(in Square Feet of Gross Leasable Area)

<u>Retail Space Category</u>	<u>Total</u> <u>Proposed Space</u>	<u>Lane Ranch</u> <u>Towne Center</u>	<u>The Commons</u> <u>at Quartz Hill</u>	<u>Other</u> <u>Retail Centers</u>
Shopper Goods (GAFO)				
General Merchandise (incl Department Stores)	335,068	107,145	227,923	
Non-Specified GAFO Space	198,836	47,500	27,150	124,186
Subtotal	533,904	154,645	255,073	124,186
Building Materials/Garden Supplies	212,662	171,038	21,624	20,000
Convenience Goods: Food/Beverage Facilities	145,736	27,000	45,736	73,000
Convenience Goods: Drug Stores	122,207	18,872	15,564	87,771
Eating & Drinking Facilities (All Restaurants)	94,557	16,000	13,425	65,132
Subtotal, Retail Space	1,109,066	387,555	351,422	370,089
Non-Retail Space (Business and Personal Services, et al)	120,584	7,800	14,954	97,830
GRAND TOTAL	1,229,650	395,355	366,376	467,919

Source: Various developers; City of Lancaster Planning Department; HR&A Advisors, Inc.; W & W, Inc.

D. Shopper Goods Space Impact Analysis

As reflected in Tables 4 and 16, the Project will provide a total of 154,645 square feet GLA of Shopper Goods space that will include space in the Target Department Store (107,145 square feet GLA of General Merchandise) and 47,500 square feet GLA in various in-line space and free-standing pads that will offer a mix of apparel, home furnishings and other specialty retail stores. Based upon spending patterns exhibited in Los Angeles County, over 29 percent of PMA resident retail expenditures typically are allocated for Shopper Goods, as noted in Table 17 below.

**Table 17
PERCENTAGES OF RETAIL SALES ALLOCABLE TO SHOPPER GOODS
LOS ANGELES COUNTY AND LANCASTER MARKET AREAS**

<u>Retail Space Category</u>	<u>Percent of Retail Sales</u>
General Merchandise (incl Department Stores)	9.56%
Apparel and Accessories	4.60%
Furniture, Furnishings and Appliances	3.38%
Other or Specialty	11.71%
Grand Total	29.25%

Source: California State Board of Equalization, 2007 Annual Report; HR&A, Inc.; W&W, Inc.

Table 18 provides an annual projection of the growth in demand for Shopper Goods in the PMA for the period 2007 through 2012 that is based upon projected increases in population and per capita incomes. Based upon the market area growth forecast, total sales in Shopper Goods should increase by nearly \$121.9 million over the five-year projection period, as shown in the last row of Table 18.

**Table 18
PROJECTED GROWTH IN DEMAND FOR SHOPPER GOODS
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012**

	Net Change (000s) 2007-2012	2007	2008	2009	2010	2011	2012	
Primary Market Area (PMA) Population	13,245	89,188	92,049	95,002	97,417	99,893	102,433	
Per Capita Personal Income (per BEA Definition)	\$ 6,489	\$ 44,288	\$ 45,794	\$ 45,198	\$ 46,057	\$ 48,590	\$ 50,777	
Aggregate Regional Market Area Income ('000s)	\$ 1,251,282	\$ 3,949,958	\$ 4,215,292	\$ 4,293,900	\$ 4,486,735	\$ 4,853,801	\$ 5,201,240	
Percent of Personal Income Allocable for Retail Sales:		33.3%	33.3%	33.3%	33.3%	33.3%	33.3%	
Potential Demand for Retail Sales ('000s)	\$ 416,677	\$ 1,315,336	\$ 1,403,692	\$ 1,429,869	\$ 1,494,083	\$ 1,616,316	\$ 1,732,013	
Calculation of Increase in Demand for Shopper Goods:								
	% of Total Retail Demand	Net Change (000s) 2007-2012	2007	2008	2009	2010	2011	2012
All Shopper Goods ('000s)	29.25%	\$ 121,878	\$ 384,736	\$ 410,580	\$ 418,237	\$ 437,019	\$ 472,772	\$ 506,614
Incremental Growth in Demand by Year ('000s)			\$ 25,844	\$ 7,657	\$ 18,783	\$ 35,753	\$ 33,841	
Cumulative Growth in Demand ('000s)			\$ 25,844	\$ 33,501	\$ 52,283	\$ 88,037	\$ 121,878	

Source: California State Board of Equalization; Claritas, Inc.; HR&A Advisors, Inc.; W & W, Inc.

Table 19 translates the projected incremental change in PMA demand for Shopper Goods into a measure of net supportable retail space, allowing for a threshold sales requirement of \$350 per square foot²⁶ of GLA in 2007 to reflect the necessary basis for effective market support. This sales support requirement is expected to increase at a rate consistent with the growth in the Consumer Price Index (CPI) as forecasted by the UCLA Anderson Forecast (March 2009), reaching \$385 per square foot of GLA in 2012. Over the five-year analysis period, the projected increase in supportable retail space for the combined Shopper Goods retail categories generated by the PMA is 316,540 square feet as noted in the last row of Table 19.

Table 19
PROJECTED INCREASE IN SUPPORTABLE SPACE FOR SHOPPER GOODS
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012

	2007	2008	2009	2010	2011	2012
Projected Increase in Supportable Retail Space, Shopper Goods Stores:						
Sales per Square Foot of GLA Requirement, Average:	\$ 350	\$ 362	\$ 358	\$ 364	\$ 373	\$ 385
Base	\$ 350					
Annual Increase in Required Support Per CPI		3.4%	-1.2%	1.8%	2.5%	3.2%
	In Square Feet GLA					
		2008	2009	2010	2011	2012
Annual Increase in Supportable Shopper Goods Space		71,412	21,414	51,601	95,829	87,893
Cumulative Increase (Adjusted for higher sales requirement per square foot)		71,412	93,694	143,638	235,964	316,540

Source: HR&A Advisors, Inc.; W & W, Inc.

In 2012 the potential increase in supply of Shopper Goods retail space will be generated by three sources: (1) the Project, with 154,645 square feet GLA; (2) The Commons, 255,073 square feet GLA; and (3) the other competitive centers identified in Table 14, with 124,186 square feet GLA. This projected additional supply, summarized in Table 16 and presented again in Table 20, totals 533,904 square feet GLA.

²⁶ This sales requirement and others utilized in the analysis are based on performance data from The Urban Land Institute and International Council of Shopping Centers, Dollars & Cents of Shopping Centers, 2006 and 2008 as well as the consultant's knowledge of the industry and major retailers' expectations as of 2007 and 2009. Given the recent declines in retail spending and shopping center performances since the start of the current national recession, in some circumstances developers and anchor tenants would be willing to accept initial store performances at less than the \$350 standard in the initial years of operation (e.g., 90%, or \$315 per square foot of sales), particularly if the opportunity resulted in the establishment of a dominant position within a growing market area such as the western Antelope Valley.

Table 20
 COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY OF SHOPPER GOODS SPACE
 LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA) AND OTHER SOURCES
 2007-2012

	Factor	Square Feet GLA				
		2008	2009	2010	2011	2012
Total Supportable GAFO Space by PMA Residents	70%	71,412	93,694	143,638	235,964	316,540
Total Supportable GAFO Space from Other Market Sources	30%	30,605	40,154	61,559	101,127	135,660
Total Supportable Space	100%	102,018	133,848	205,198	337,091	452,200
Projected Supply of Additional GAFO Space						154,645
PROPOSED PROJECT						154,645
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						255,073
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						409,718
Other Proposed Space in PMA						124,186
Grand Total, All Proposed Shopper Goods Space						533,904
Comparison 1:	Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					49%
Comparison 2:	Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space from All Market Sources					91%
Comparison 3:	Projected Total Supply of Space as a Share of Total Supportable Space from all Market Sources					118%

Source: HR&A Advisors, Inc.; W & W, Inc.

The final step in the analysis of Shopper Goods is making a comparison between the projected demand and projected supply of Shopper Goods space. In this regard, three comparisons are considered relevant to the analysis: (1) a comparison between the growth in demand for Shopper Goods space in the PMA with the additional supply represented by the Project; (2) a comparison between the demand for Shopper Goods space in the combined PMA and SMA with potential supply represented by both the Project and The Commons shopping center, where the SMA represents 30 percent of total demand; and (3) a comparison between potential demand for Shopper Goods at the Project location from both the PMA and the SMA, and the cumulative development of the Project, The Commons and the other competitive centers. Each comparison is presented below and summarized in the bottom three rows of Table 20.

- Comparison 1: Increase in Shopper Goods supportable space in the PMA with the Shopper Goods space proposed at the Project.** In this comparison the total supply of Shopper Goods space in the Project of 154,645 square feet GLA represents only 49 percent of the projected increase in demand for Shopper Goods space in the PMA. Thus, if the Project provided the only new Shopper Goods retail space developed in the PMA by 2012, it could easily be supported without impacting existing retailers' sales support levels from PMA residents, and therefore would not raise any issues regarding urban decay.
- Comparison 2: Increase in Shopper Goods supportable space in the PMA (70% of total market support) and SMA (30% of total market support) with the combined Shopper Goods space for the Project and The Commons at Quartz Hill that will be developed at the intersection of 60th Street W and West Avenue L.** The combined development of the two centers would provide 409,718 square feet GLA of Shopper Goods space, which is equivalent to 91 percent of the Total Shopper Goods space that can be supported by the combined demand from both PMA and SMA residents. This comparison suggests that by 2012 the growth in market demand for Shopper Goods space would increase by 2013 to such a degree that the combined development of Shopper

Goods space in the two centers would not adversely impact future market conditions adversely or lead to a process of urban decay.

- Comparison 3: Increase in Shopper Goods supportable space in the combined PMA and SMA with the cumulative Shopper Goods Space for all Projects proposed for development by 2012.** In this comparison the projected cumulative supply of Shopper Goods space represents 118 percent of total demand, representing a condition of potential oversupply of 81,704 square feet in 2012. However, given that the annual growth in Shopper Goods demand should exceed 100,000 square feet per year by that date, the potential oversupply should be eliminated by market area growth in demand by 2013. This projection is shown below in Table 21.

Table 21
COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY OF SHOPPER GOODS SPACE
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA) AND OTHER SOURCES
2007-2013

	Factor	Square Feet GLA					
		2008	2009	2010	2011	2012	2013
Total Supportable GAFO Space by PMA Residents	70%	71,412	93,694	143,638	235,964	316,540	397,970
Total Supportable GAFO Space from Other Market Sources	30%	30,605	40,154	61,559	101,127	135,660	170,558
Total Supportable Space	100%	102,018	133,848	205,198	337,091	452,200	568,528
Projected Supply of Additional GAFO Space							
PROPOSED PROJECT						154,645	154,645
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						255,073	255,073
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						409,718	409,718
Other Proposed Space in PMA						124,186	124,186
Grand Total, All Proposed Shopper Goods Space						533,904	533,904
Comparison:	Projected Total Supply of Space as a Share of Total Supportable Space from all Market Sources					118%	94%

Source: HR&A Advisors, Inc.; W & W, Inc.

A second test of the future market's ability to support the proposed Shopper Goods space was to consider the amount of space that could be supported if the sales per square foot requirement were reduced by 10 percent, thus reflecting recent declines in market performance for most retail facilities. As noted in Table 22, if the basic level of sales support is reduced by 10 percent to \$315 per square foot GLA, the projected growth in demand from the PMA and SMA is also sufficient to accommodate the entire anticipated increase in Shopper Goods space from the combined 14 centers within the second full calendar year of the Project's operation or 2013.

Table 22
COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY OF SHOPPER GOODS SPACE
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA) AND OTHER SOURCES
2007-2013
ASSUMING BASELINE SALES PER SQUARE FOOT REQUIREMENT OF \$315 PER SQUARE FOOT GLA TO REFLECT RECENT MARKET CONDITIONS

	Factor	Square Feet GLA					
		2008	2009	2010	2011	2012	2013
Total Supportable GAFO Space by PMA Residents	70%	79,347	104,104	159,598	262,182	351,711	442,188
Total Supportable GAFO Space from Other Market Sources	30%	34,006	44,616	68,399	112,364	150,733	189,509
Total Supportable Space	100%	113,353	148,720	227,997	374,546	502,444	631,698
Projected Supply of Additional GAFO Space							
PROPOSED PROJECT						154,645	154,645
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						255,073	255,073
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						409,718	409,718
Other Proposed Space in PMA						124,186	124,186
Grand Total, All Proposed Shopper Goods Space						533,904	533,904
Comparison:	Projected Total Supply of Space as a Share of Total Supportable Space from all Market Sources					106%	85%

Source: HR&A Advisors, Inc.; W & W, Inc.

Summarizing these comparative calculations, given the likely continued growth of both the PMA and the SMA in population and per capita personal income over the period 2007 through 2013, together with the likelihood that the Project will draw significant patronage from the SMA, development of the Project should not have a significant impact on the existing base of Shopper Goods retail space in the PMA or the SMA. Moreover, the likely depth of the expanding market should also allow for the successful development of the proposed Shopper Goods facilities at the adjacent The Commons shopping center without creating circumstances that would lead to urban decay.

Two final observations can be made regarding the proposed development of Shopper Goods space on the site that has been chosen for the Project. First, the proposed location and timing of the Project and The Commons developments strongly suggest that the developers and their anchor store tenants are establishing positions in the market that are slightly in advance of future demand. In taking this step they may be intending to pre-empt market competition in the future by selecting a superior position and accepting short term sales “shortfalls” in order to ensure long term market success. Second, it is also important to recognize that if there is any major impact on existing or new developments in the PMA from a short term oversupply of Shopper Goods space, this impact is most likely to affect the two shopping centers that are being developed at the intersection of West Avenue L and 60th Street West, namely the Project and the Commons. Of the 14 new or proposed centers under considered in this evaluation, they are the only two proposed developments that are “anchored” by a large retailer offering General Merchandise, thus the only centers that would experience major problems should one of the major General Merchandise stores fail. In contrast, all of the other centers are either anchored by other types of retail stores or do not have a major anchor tenant. As a result, an excess supply of Shopper Goods in the PMA over the short term is not likely to cause such a large vacancy problem to any of them that the condition would likely lead to urban decay.

E. Building Materials and Garden Supplies Space Impact Analysis

Based upon recent (2007) sales data, Los Angeles County residents typically allocate 5.91% of their retail purchases for the combined Building Materials and Garden Supplies retail categories. As noted in Table 23 below, based upon the anticipated growth in population and income, PMA residents are projected to increase their retail sales for Building Materials and Garden Supplies by over \$24.6 million between 2007 and 2012.

Table 23
PROJECTED GROWTH IN DEMAND FOR BUILDING MATERIALS AND GARDEN SUPPLIES
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012

	Net Change 2007-2012	2007	2008	2009	2010	2011	2012
Potential PMA Demand for Retail Sales ('000s)	\$ 416,677	\$ 1,315,336	\$ 1,403,692	\$ 1,429,869	\$ 1,494,083	\$ 1,616,316	\$ 1,732,013
Calculation of Demand for Building Materials and Garden Supplies:							
	% of Total Demand	Net Change ('000s) 2007-2012					
Building Materials and Garden Supplies Demand ('000s)	5.91%	\$ 24,626	\$ 77,736	\$ 82,958	\$ 84,505	\$ 88,300	\$ 95,524
Incremental Growth in Demand by Year ('000s)			\$ 5,222	\$ 1,547	\$ 3,795	\$ 7,224	\$ 6,838
Cumulative Growth in Demand ('000s)			\$ 5,222	\$ 6,769	\$ 10,564	\$ 17,788	\$ 24,626

Source: California State Board of Equalization; Claritas, Inc.; HR&A Advisors, Inc.; W & W, Inc.

Table 24 translates the projected 2007-2012 growth in Building Materials and Garden Supply sales demand within the PMA into supportable retail space. Given a market standard of \$250 per square foot (expressed initially in 2007 dollars and adjusted annually at the projected change in the Consumer Price Index or CPI), the projected increase in demand in the PMA is projected to support an additional 89,540 square feet GLA of Building Materials and Garden Supplies space by 2012.

Table 24
PROJECTED INCREASE IN SUPPORTABLE SPACE FOR BUILDING MATERIALS AND GARDEN SUPPLIES
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012

	2007	2008	2009	2010	2011	2012
Projected Increase in Supportable Retail Space:						
Sales per Square Foot of GLA Requirement, Average:	\$ 250	\$ 259	\$ 255	\$ 260	\$ 266	\$ 275
Base	\$ 250					
Annual Increase in Required Support per CPI		3.4%	-1.2%	1.8%	2.5%	3.2%
	In Square Feet GLA					
Supportable Building Materials and Related Space in GLA, Annual Increase		20,201	6,057	14,597	27,107	24,862
Supportable Building Materials and Related Space in GLA, Cumulative Increase		20,201	26,503	40,631	66,748	89,540

Source: HR&A Advisors, Inc.; W & W, Inc.

A major home improvement retailer at the Project should draw substantial patronage from an area beyond the PMA, in this instance most probably from portions of the SMA that are located westerly and southerly of the shopping center site. Demand for sales should also come from builders and landscape contractors that are active in the community. As a consequence, after allowance is made for 30 percent of the market support to come from beyond the PMA, the total supportable space approaches 127,914 square feet GLA, as presented in Table 25 below.

Table 25
COMPARISON OF PROJECTED DEMAND WITH PROJECTED INCREASE OF SUPPLY OF BUILDING MATERIALS AND GARDEN SUPPLIES STORE SPACE
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA
2007-2012

	Factor	Square Feet GLA				
		2008	2009	2010	2011	2012
Total Supportable Building Materials Space by PMA Residents	70%	20,201	26,503	40,631	66,748	89,540
Total Supportable Building Materials Space from Other Market Sources	30%	8,657	11,359	17,413	28,606	38,373
Total Supportable Space	100%	28,858	37,862	58,045	95,354	127,914
Projected Supply of Additional Building Materials and Related Space						
PROPOSED PROJECT						171,038
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						21,624
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						192,662
Other Existing and Proposed Space in PMA, 2007-2012						20,000
Grand Total, All Proposed Building Materials and Garden Supply Space						212,662
Comparison 1: Proposed Project Space as a Percent of Total Supportable Space by PMA Residents						191%
Comparison 2: Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space from All Market Sources						151%
Comparison 3: Projected Total Supply of Space as a Percent of Total Supportable Space from all Market Sources						166%

Source: HR&A Advisors, Inc.; W & W, Inc.

In addition to the proposed home improvement center at the Project, additional building materials and garden supply space will be provided at The Commons in the form of a 21,624 square foot garden center that will be part of the Wal-Mart store. Further, it should be noted that

another home improvement center has been proposed in the second phase of another shopping center being developed in the PMA (see project #2, Table 14), though this specific facility is not scheduled to open until 2014. If completed as presently conceived, this project would add an additional 171,069 square feet GLA of Building Materials and Garden Supplies space to the PMA by that date.

Following the same comparative analysis sequence that was utilized to evaluate Shopper Goods, three basic comparisons were made between the projected additional demand and proposed additional supply of Building Materials and Garden Supplies space: (1) a simple comparison of additional demand for space generated by the PMA with the amount of space proposed by the Project; (2) a comparison of additional PMA and SMA resident demand with the total supply proposed by the Project and The Commons where the SMA residents represent 30 percent of total demand; and (3) a comparison of the demand for space generated by combined PMA residents and SMA residents with the total space proposed by the Project and all other new projects planned for completion in the PMA over the same time period. These comparisons are shown in the bottom three rows of Table 25.

Comparison 1: Increase in Building Materials and Garden Supplies supportable space in the PMA with Building Materials and Garden Supplies space proposed at the Project. In this comparison the total space proposed by the Project represents nearly double (191 percent) the projected increase in PMA demand over the period 2007 to 2012. Clearly, in order for this space to be successful in the short term, additional sales will need to be attracted from residents living in the PMA, the SMA and beyond, particularly from the population living in the more rural areas westerly of the Project site. However, as is noted in Comparison 2 below, projected growth in the PMA and SMA would likely be sufficient to support the space from the Project and from its proposed neighbor, The Commons, by 2015.

Comparison 2: Increase in Building Materials and Garden Supplies supportable space in the PMA and SMA with the combined Building Materials and Garden Supplies space to be provided by the Project and The Commons. The combined development of the Project and The Commons as currently proposed would provide Building Materials and Garden Supplies space totaling 192,662 square feet GLA, an amount which is equivalent to 151 percent of the projected demand from the combined market areas in 2012. Projected growth in demand for subsequent years suggests that the space in the two projects would be fully supported at the suggested 2007 baseline level of \$250 sales per square foot GLA (inflated annually per CPI) by 2015. This result is shown in Table 26 below. Assuming that there is no further growth in supply in the PMA other than the space that has been identified in Tables 14 through 16 for the period 2007-2012, there are no significant urban decay issues related to the development of these two projects.

Table 26
 COMPARISON OF PROJECTED DEMAND WITH PROJECTED INCREASE OF SUPPLY OF BUILDING MATERIALS AND GARDEN SUPPLIES STORE SPACE
 LANCASTER SHOPPING CENTER PRIMARY MARKET AREA
 2007-2015

	Factor	Square Feet GLA							
		2008	2009	2010	2011	2012	2013	2014	2015
Total Supportable Building Materials Space by PMA Residents	70%	20,201	26,503	40,631	66,748	89,540	112,574	135,877	154,994
Total Supportable Building Materials Space from Other Market Sources	30%	8,657	11,359	17,413	28,606	38,374	48,246	58,233	66,426
Total Supportable Space	100%	28,858	37,862	58,045	95,354	127,915	160,821	194,110	221,420
Projected Supply of Additional Building Materials and Related Space									
PROPOSED PROJECT									
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						171,038	171,038	171,038	171,038
						21,624	21,624	21,624	21,624
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						192,662	192,662	192,662	192,662
Other Proposed and New Space in PMA, 2007-2012						20,000	20,000	20,000	20,000
Grand Total, All Proposed Building Materials and Garden Supply Space						212,662	212,662	212,662	212,662
Comparison:	Projected Total Supply of Space as a Percent of Total Supportable Space from all Market Sources					166%	132%	110%	96%

Source: HR&A Advisors, Inc.; W & W, Inc.

- Comparison 3: Increase in Building Materials and Garden Supplies Supportable space in the PMA and the SMA with the proposed space for the Project and all other projects proposed for development by 2012.** Given the findings of Comparison 2 above indicating that the development of both the Project and The Commons could provide an increase in supply of Building Materials and Garden Supplies space that likely would exceed market demand until 2015 under the sales requirements utilized for this analysis, the evaluation period was extended beyond 2012 with respect to consideration of additional sources of future supply. Accordingly, Comparison 3 includes the proposed addition of a second major home improvement center planned for completion by 2014 as part of Phase II of the proposed shopping complex (project #2, Table 14) under consideration at West Avenue K and 60th Street West that is located approximately one mile north of the Project. Table 27 adds this proposed addition to the supply of Building Materials and Garden Supplies space to the inventory in year 2014, the anticipated date of this facility's completion. As shown in the table, this addition would raise the total supply of Building Materials and Garden Supplies space to a level equivalent to 198 percent of the total anticipated growth in demand for the year 2014, thus representing an effective oversupply by that year of 189,621 square feet GLA. Based upon this projection of future market conditions, it is clear that this proposed addition would not be warranted by anticipated growth in demand, but would merely contribute to the condition of oversupply that was identified in Comparisons 1 and 2 above.

Table 27
 COMPARISON OF PROJECTED DEMAND WITH PROJECTED INCREASE OF SUPPLY OF BUILDING MATERIALS AND GARDEN SUPPLIES STORE SPACE
 LANCASTER SHOPPING CENTER PRIMARY MARKET AREA
 ASSUMING DEVELOPMENT OF A MAJOR HOME IMPROVEMENT FACILITY AT AVENUE K AND 60TH STREET WEST IN 2014
 2007-2014

	Factor	Square Feet GLA						
		2008	2009	2010	2011	2012	2013	2014
Total Supportable Building Materials Space by PMA Residents	70%	20,201	26,503	40,631	66,748	89,540	112,574	135,877
Total Supportable Building Materials Space from Other Market Sources	30%	8,657	11,359	17,413	28,606	38,374	48,246	58,233
Total Supportable Space	100%	28,858	37,862	58,045	95,354	127,915	160,821	194,110
Projected Supply of Additional Building Materials and Related Space								
PROPOSED PROJECT								
Other Competitive Center at 60th Street West and West Avenue L (The Commons))						171,038	171,038	171,038
						21,624	21,624	21,624
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						192,662	192,662	192,662
Other Proposed and New Space in PMA, 2007-2012						20,000	20,000	20,000
Home Improvement Center, West Avenue K and 60th Street West, 2014								171,069
Grand Total, All Proposed Building Materials and Garden Supply Space						212,662	212,662	383,731
Comparison:	Projected Total Supply of Space as a Percent of Total Supportable Space from all Market Sources					166%	132%	198%

Source: HR&A Advisors, Inc.; W & W, Inc.

Recognizing the probable condition of significant oversupply if a second major home improvement center is developed as suggested in Table 27, the important follow-on question to consider is whether there would be conditions that could contribute to significant urban decay if both major improvement centers were completed by 2014 without a dramatic growth in potential demand not foreseen in this analysis. In this regard, it should be recognized that only two existing or proposed projects located in the PMA have a significant amount of Building Materials and Garden Supplies space that would be affected if all the proposed GLA were constructed: (1) the Project at the West Avenue L/60th Street West intersection; and (2) the center identified above as project #2 being developed at West Avenue K and 60th Street West, a location that is just one mile north of the Project/The Commons complex.

Effectively, these home improvements centers would be competing for the same market area — namely, those residents and builders located and/or working on projects west of the Antelope Valley Freeway corridor. Also, it should be noted that the home improvement centers for each location have similar dimensions, 170,000+/- square feet GLA including a 30,000+/- square foot outdoor garden supply component. Given (1) the similarity of location, (2) the similarity of proposed building configuration, and (3) the recent delay in the development timing of the home improvement center at the West Avenue K/60th Street West project to a second phase scheduled to open in 2014, it is entirely possible that the home improvement center operator is the same at both locations and/or the developer at the West Avenue K site is waiting to see whether Lane Ranch is approved before making a final commitment to a home improvement facility at his site. Moreover, given that (1) the potential condition of extreme oversupply, at the earliest, would occur five years into the future, and (2) both the Lane Ranch developer and the West Avenue K/60th Street West developer will have substantial opportunities to reconfigure or refine their respective development programs, it is highly unlikely that both home improvement centers would be completed by 2014 where such a condition could lead to extreme oversupply of home improvement retail space in the PMA.

F. Convenience Goods Space Impact Analysis

Typically, there are two major types of Convenience Goods that are included in retail analysis: (1) Food/Beverage Stores, including supermarkets, specialty food stores like Trader Joe’s and beverage stores; and (2) large, free-standing drugstores that offer a variety of household goods, such as paper and personal care products and small pharmacies specializing in prescriptions. The following section reviews the market for both food/beverage stores and drug stores.

Given the dispersed character of the Antelope Valley development pattern and the likely presence of two regional anchor tenants that would draw patronage, the primary market area for food stores and drug stores at the Project is considered to be the same as the PMA or the five-mile market radius. This radius is larger than would typically be used in urban settings where development is more dense and compact, and where competitive facilities are found at nearby locations. Moreover, given the Project’s location nearly five miles west of the Antelope Valley Freeway (S. R. 14/138) at a key point of access on the existing regional highway system, the Project is also likely to attract patronage from at least the western half of the SMA for food/beverage and drug purchases.

Analysis of Los Angeles County resident spending patterns taken from both the State Board of Equalization and U.S. Census of Retail Trade publications indicates that 14.21 percent of all retail expenditures are captured by food stores and 4.38 percent of all retail expenditures are captured by drug stores. Over the period 2007 through 2012, the projected increase in PMA resident demand should approach nearly \$59.2 million for food and beverage store purchases and nearly \$18.3 million for drugstore purchases. These projections are presented in Table 28.

**Table 28
PROJECTED GROWTH IN DEMAND FOR CONVENIENCE GOODS
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012**

	Net Change (‘000s) 2007-2012	2007	2008	2009	2010	2011	2012
Potential Demand for Retail Sales (‘000s)	\$ 416,677	\$ 1,315,336	\$ 1,403,692	\$ 1,429,869	\$ 1,494,083	\$ 1,616,316	\$ 1,732,013

Calculation of Demand for Selected Convenience Goods by Major Category:

	% of Total Demand	Net Change (‘000s) 2007-2012	2007	2008	2009	2010	2011	2012
Food and Beverage Stores (‘000s)	14.21%	\$ 59,210	\$ 186,909	\$ 199,465	\$ 203,184	\$ 212,309	\$ 229,679	\$ 246,119
Incremental Growth in Demand by Year (‘000s)				\$ 12,555	\$ 3,720	\$ 9,125	\$ 17,369	\$ 16,441
Cumulative Growth in Demand (‘000s)				\$ 12,555	\$ 16,275	\$ 25,400	\$ 42,769	\$ 59,210
Drug Stores (‘000s)	4.38%	\$ 18,250	\$ 57,612	\$ 61,482	\$ 62,628	\$ 65,441	\$ 70,795	\$ 75,862
Incremental Growth in Demand by Year (‘000s)				\$ 3,870	\$ 1,147	\$ 2,813	\$ 5,354	\$ 5,068
Cumulative Growth in Demand (‘000s)				\$ 3,870	\$ 5,017	\$ 7,829	\$ 13,183	\$ 18,250

Source: California State Board of Equalization; Claritas, Inc.; HR&A Advisors, Inc.; W & W, Inc.

Table 29 converts the projected 2007-2012 PMA growth in food store and drug store sales demand into supportable square feet GLA of drugstore/pharmacy space. Utilizing market standards that are appropriate for this location of \$500 per square foot GLA for food stores and \$650 per square foot for drug stores/pharmacies (expressed initially in 2007 dollars and adjusted

annually at the projected change in the Consumer Price Index or CPI), the projected increase in supportable food store space in 2012 is 107,645 square feet GLA and 25,523 square feet GLA for drug stores.

Table 29
PROJECTED INCREASE IN SUPPORTABLE SPACE FOR CONVENIENCE GOODS
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012

	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>
Projected Increase in Supportable Retail Space, Food/Beverage Stores:						
Sales per Square Foot of GLA Requirement, Average:	\$ 500	\$ 517	\$ 511	\$ 520	\$ 533	\$ 550
Base	\$ 500					
Annual Increase in Required Support per CPI		3.4%	-1.2%	1.8%	2.5%	3.2%
Projected Increase in Supportable Retail Space, Drug Stores:						
Sales per Square Foot of GLA Requirement, Average:	\$ 650	\$ 672	\$ 664	\$ 676	\$ 693	\$ 715
Base	\$ 650					
Annual Increase in Required Support per CPI		3.4%	-1.2%	1.8%	2.5%	3.2%
	<i>In Square Feet GLA</i>					
	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	
Supportable Food/BeverageSpace in GLA, Annual Increase	24,285	7,282	17,548	32,588	29,889	
Cumulative Increase (Adjusted for higher sales requirement per square foot)	24,285	31,862	48,847	80,244	107,645	
Supportable Drug Store Space in GLA, Annual Increase	5,758	1,727	4,161	7,727	7,087	
Cumulative Increase (Adjusted for higher sales requirement per square foot)	5,758	7,555	11,582	19,026	25,523	

Source: HR&A Advisors, Inc.; W & W, Inc.

1. Food Stores, including Supermarkets, Other Food Stores and Beverage Stores

Food store space at the Project is projected to approach 27,000 square feet GLA, based on a prototypical allocation for this category within a Target Department Store. For The Commons, the allocation is estimated at 45,736 square feet GLA, per space typically provided within a Wal-Mart Superstore. The other proposed centers in the PMA are expected to supply 73,000 square feet of food store space by 2012, raising the total addition to supply to 145,736 square feet GLA. These additions to supply, summarized previously in Tables 14 and 16, are also noted in Table 30 below.

Table 30
 COMPARISON OF PROJECTED INCREASE IN MARKET DEMAND WITH PROJECTED INCREASE IN SUPPLY OF FOOD
 AND BEVERAGE STORE SPACE, LANCASTER SHOPPING CENTER MARKET AREAS
 2007-2012

	Factor	Square Feet GLA				
		2008	2009	2010	2011	2012
Total Supportable Food/Beverage Space by PMA Residents	85%	24,285	31,862	48,847	80,244	107,645
Total Supportable Food/Beverage Space from Other Market Sources	15%	4,286	5,623	8,620	14,161	18,996
Total Supportable Space	100%	28,571	37,485	57,467	94,405	126,641
Projected Supply of Additional Food/Beverage Space						
PROPOSED PROJECT						
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						27,000
						45,736
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						72,736
Other Proposed Space in PMA						73,000
Grand Total, All Proposed Food Store Space						145,736
Comparison 1:	Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					21%
Comparison 2:	Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space by All Market Sources					57%
Comparison 3:	Projected Total Supply of Space as a Percent of Total Supportable Space by All Market Sources					115%

Source: HR&A Advisors, Inc.; W & W, Inc.

Following same analysis sequence that was utilized to evaluate Shopper Goods and Building Materials/Garden Supplies, three basic comparisons were made between the projected additional demand and proposed additional supply of Food and Beverage Facilities space: (1) a simple comparison of additional demand for space generated by the PMA with the amount of space proposed by the Project; (2) a comparison of additional PMA and SMA resident demand with the total supply proposed by the Project and The Commons, where the SMA residents represent 15 percent of total demand; and (3) a comparison of the demand for space generated by combined PMA residents and SMA residents with the total space proposed by the Project and all other new projects planned for completion in the PMA over the same time period. These comparisons are shown in the bottom three rows of Table 30.

- **Comparison 1: Increase in Food and Beverage supportable space in the PMA with Food and Beverage Space proposed at the Project.** In this comparison the total Food and Beverage space proposed by the Project represents 21 percent of the projected increase in PMA demand, and thus could be supported without adversely impacting the existing pattern of sales in the market area (i.e., no urban decay impacts).
- **Comparison 2: Increase in Food and Beverage supportable space in the PMA and SMA with the combined Food and Beverage supportable space provided by the Project and The Commons.** The combined development of the Project and The Commons would generate Food and Beverage space totaling 72,736 square feet of GLA, an amount that would be equivalent to 57% of the supportable demand from the combined market areas in 2012, and therefore presents no urban decay impacts.
- **Comparison 3: Increase in Food and Beverage supportable space in the PMA and SMA with the proposed space in the Project and all other retail centers proposed for development by 2012.** The proposed cumulative development of all projects by 2012 would generate a total supply of 145,736 square feet of Food and Beverage space, an

amount that represents 115 percent of projected growth in demand, or a potential oversupply of 19,095 square feet GLA when utilizing the 2007 \$500 per square foot GLA sales standard inflated to an equivalent 2012 value of \$550. Effectively, current projections for 2012 suggest that the likely market support level would be closer to \$406 per square foot GLA.

Table 31 provides a further examination of market conditions beyond 2012 in order to determine when market demand would provide support at the sales levels suggested as most appropriate for major food and beverage facilities. As noted, market demand would reach the desired support level by 2013, thus in the second full calendar year of operations.

Table 31
COMPARISON OF PROJECTED INCREASE IN MARKET DEMAND WITH PROJECTED INCREASE IN SUPPLY OF FOOD AND BEVERAGE STORE SPACE
LANCASTER SHOPPING CENTER MARKET AREAS
2007-2013

	Factor	Square Feet GLA					
		2008	2009	2010	2011	2012	2013
Total Supportable Food/Beverage Space by PMA Residents	85%	24,285	31,862	48,847	80,244	107,645	135,337
Total Supportable Food/Beverage Space from Other Market Sources	15%	4,286	5,623	8,620	14,161	18,996	23,883
Total Supportable Space	100%	28,571	37,485	57,467	94,405	126,641	159,220
Projected Supply of Additional Food/Beverage Space							
PROPOSED PROJECT						27,000	27,000
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						45,736	45,736
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						72,736	72,736
Other Proposed Space in PMA						73,000	73,000
Grand Total, All Proposed Food Store Space						145,736	145,736
Comparison 1:	Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					21%	17%
Comparison 2:	Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space by All Market Sources					57%	46%
Comparison 3:	Projected Total Supply of Space as a Percent of Total Supportable Space by All Market Sources					115%	92%

Source: HR&A Advisors, Inc.; W & W, Inc.

While there is a possibility that there would be a short term oversupply of Food and Beverage space based in part upon the sales standard applied in this evaluation, this issue is not considered likely to lead to urban decay for the following reasons:

(1) One half of the proposed Food and Beverage space (an estimated 72,736 square feet GLA) would be provided by grocery departments that are embedded within the two anchor stores proposed for development at the West Avenue L/60th Street West site: Target (Project); and Wal-Mart (The Commons). If sales are low in the Food and Beverage sections, the retailers can re-configure the space to fill other market niches for the short term;

(2) The only other proposed shopping center with a major Food and Beverage component is the neighborhood center proposed for development at the northwest corner of 40th Street West and West Avenue J (project #1, Table 14). This project is currently undergoing entitlement, and assuming it were approved for construction, the developer(s) of this project would then need to consider the competitive conditions that their center would face in the future from the Project, The Commons and other existing and proposed retail centers in the PMA; and

(3) Growth in market demand in the PMA and SMA should be sufficient to support all proposed Food and Beverage space by 2013, thus obviating conditions that could be causal factors leading to future extreme oversupply and possible urban decay.

2. Drug Stores/Pharmacies

In contrast to the relative balance that is likely to be achieved between supply and demand for general merchandise, building materials/garden supply and food/beverage store space within two to three calendar years after full operation of the proposed centers in the PMA, if all the drug store and pharmacy space that is presently included in proposed shopping center development programs is constructed as currently proposed, there will likely be a major oversupply by 2012 that will not be easily resolved by growth in demand.

Both the developers of the Project and The Commons, for example, have expectations of providing: (1) a free-standing drug store on a pad; and (2) a pharmacy inside the anchor store in their respective centers, potentially resulting in four drug/pharmacy facilities with a total of 34,436 square feet GLA of drug/pharmacy space at the intersection of 60th Street W and West Avenue L. In addition, other projects are expecting to add another 87,771 square feet GLA of drug stores/pharmacies to the PMA, raising the total additional space in this Convenience Goods category to 122,207 square feet GLA by 2012. These additions to inventory were itemized in Table 14 and their implications are shown below in Table 32:

Table 32
COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY OF DRUG STORE SPACE
LANCASTER SHOPPING CENTER MARKET AREAS
2007-2012

	Factor	Square Feet GLA				
		2008	2009	2010	2011	2012
Total Supportable Drug Store Space by PMA Residents	85%	5,758	7,555	11,582	19,026	25,523
Total Supportable Drug Store Space from Other Market Sources	15%	1,016	1,333	2,044	3,358	4,504
Total Supportable Space	100%	6,774	8,888	13,626	22,384	30,027
Projected Supply of Additional Drug Store Space						
PROPOSED PROJECT						
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						18,872
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L						34,436
Other Proposed Space in PMA						87,771
Grand Total, All Proposed Food Store Space						122,207
Comparison 1:	Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					74%
Comparison 2:	Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space by All Market Sources					115%
Comparison 3:	Projected Total Supply of Space as a Percent of Total Supportable Space by All Market Sources					407%

Source: HR&A Advisors, Inc.; W & W, Inc.

Following the same analysis sequence that was utilized to evaluate other retail goods, a comparison between supply and demand for drug store/pharmacy space under three sets of potential future market conditions is presented below:

- **Comparison 1: Increase in Drug Store supportable space in the PMA with Drug Store Space proposed at the Project.** The Project will offer both a stand-alone drug store and

pharmacy space within the Wal-Mart, resulting in a total of 15,564 square feet GLA. This potential supply represents 70 percent of total projected PMA resident demand, and therefore does not present any urban decay issues.

- Comparison 2: Increase in Drug Store supportable space in the PMA and SMA with the combined Drug Store supportable space provided by the Project and The Commons.** The combined development of the Project and The Commons would generate drug store space totaling 34,436 square feet of GLA, an amount that would be equivalent to 115 percent of the supportable demand from the combined market areas in 2012. However, as presented in the Comparison 2 line in Table 33 below, by 2013 market demand would likely be sufficient to support market supply from the Project and The Commons facilities at the level of support utilized in this analysis of the 2007 \$650 per square foot GLA threshold. Again, this does not raise any significant urban decay issues.

Table 33
COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY OF DRUG STORE SPACE
LANCASTER SHOPPING CENTER MARKET AREAS
2007-2013

	Factor	Square Feet GLA					
		2008	2009	2010	2011	2012	2013
Total Supportable Drug Store Space by PMA Residents	85%	5,758	7,555	11,582	19,026	25,523	32,089
Total Supportable Drug Store Space from Other Market Sources	15%	1,016	1,333	2,044	3,358	4,504	5,663
Total Supportable Space	100%	6,774	8,888	13,626	22,384	30,027	37,752
Projected Supply of Additional Drug Store Space							
PROPOSED PROJECT							
Other Competitive Center at 60th Street West and West Avenue L (The Commons)						18,872	18,872
						15,564	15,564
						34,436	34,436
Other Proposed Space in PMA						87,771	87,771
						122,207	122,207
Grand Total, All Proposed Drug Store/Pharmacy Space							
Comparison 1:	Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					74%	59%
Comparison 2:	Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space by All Market Sources					115%	91%
Comparison 3:	Projected Total Supply of Space as a Percent of Total Supportable Space by All Market Sources					407%	324%

Source: HR&A Advisors, Inc.; W & W, Inc.

- Comparison 3: Increase in Drug Store supportable space in the PMA and SMA with the proposed space in the Project and all other Projects proposed for development by 2012.** The proposed cumulative development of all projects by 2012 would generate a total supply of 122,207 square feet of Drug Store space, an amount that represents 470 percent of projected growth in demand by that date. Stated another way, this magnitude of development represents a potential oversupply of 96,196 square feet GLA, an amount equivalent to more than four times the square feet GLA that can be supported by projected growth in demand. Further, this condition of oversupply would not materially change in the future; as presented in Table 33, by 2013 there would still likely be an oversupply of 84,455 square feet GLA equivalent to an amount of space that represents 324 percent of the potential growth in demand over the period.

Given the potential for this significant oversupply a more detailed analysis of existing and projected future drug store/pharmacy space was undertaken in order to better understand and assess whether this possible future condition could lead to urban decay. The results of this analysis are presented in Section H. below.

G. Eating and Drinking Facilities Impact Analysis

While the demand for the Project’s Eating and Drinking Facilities would be generated by the entire range of customers at the center, it can be argued that the major source of market support for the Project’s restaurants would come from residents living near the site. As a consequence, the Eating and Drinking Facilities analysis utilizes the 5.0-mile PMA as the basis for determining the magnitude of market support that will exist for proposed restaurants at the Project.

Table 34 provides a projection of the increase in Eating and Drinking Facilities demand for the period 2007 through 2012 by utilizing the same analytic approach presented above for other types of retail space. Based upon Los Angeles County resident spending patterns, 11.42 percent of retail expenditures are made at Eating and Drinking facilities. Accordingly, the projected growth in PMA demand for restaurant expenditures between 2007 and 2012 is nearly \$47.6 million.

Table 34
PROJECTED GROWTH IN DEMAND FOR EATING & DRINKING FACILITIES
LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
2007-2012

	Net Change ('000s) 2007-2012	2007	2008	2009	2010	2011	2012	
Potential Demand for Retail Sales ('000s))	\$ 416,677	\$ 1,315,336	\$ 1,403,692	\$ 1,429,869	\$ 1,494,083	\$ 1,616,316	\$ 1,732,013	
Calculation of Demand for Eating & Drinking Facilities								
	% of Total Demand	Net Change ('000s) 2007-2012	2007	2008	2009	2010	2011	2012
Eating & Drinking Facilities Demand ('000s)	11.42%	\$ 47,585	\$ 150,211	\$ 160,302	\$ 163,291	\$ 170,624	\$ 184,583	\$ 197,796
Incremental Growth in Demand by Year ('000s))				\$ 10,090	\$ 2,989	\$ 7,333	\$ 13,959	\$ 13,213
Cumulative Growth in Demand ('000s)				\$ 10,090	\$ 13,080	\$ 20,413	\$ 34,372	\$ 47,585

Source: California State Board of Equalization; Claritas, Inc.; HR&A Advisors, Inc.; W & W, Inc.

Allowing for Eating and Drinking facilities on average to achieve sales volumes approaching \$500 per square feet (expressed initially in 2007 dollars and adjusted annually at the projected change in the Consumer Price Index or CPI to 2012), by 2012 the anticipated increase in PMA demand should be able to sustain additional restaurant space in an amount approaching 86,510 square feet GLA as shown in Table 35.

Table 35
 PROJECTED INCREASE IN SUPPORTABLE SPACE FOR EATING & DRINKING FACILITIES
 LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
 2007-2012

	2007	2008	2009	2010	2011	2012
Projected Increase in Supportable Eating & Drinking Space:						
Sales per Square Foot of GLA Requirement, Average:	\$ 500	\$ 517	\$ 511	\$ 520	\$ 533	\$ 550
Base	\$ 500					
Annual Increase in Required Support per CPI		3.4%	-1.2%	1.8%	2.5%	3.2%
	<i>In Square Feet GLA</i>					
		2008	2009	2010	2011	2012
Supportable Eating & Drinking Space in GLA, Annual Increase		19,517	5,852	14,103	26,190	24,021
Cumulative Increase (Adjusted for higher sales requirement per square foot)		19,517	25,606	39,256	64,489	86,510

Source: HR&A Advisors, Inc.; W & W, Inc.

As the analysis of potential market support for Eating and Drinking Facilities was based exclusively on the additional demand generated by PMA residents, the three comparisons between projected demand and projected supply were modified to reflect the following methodological structure: (1) Project with PMA; (2) Project and The Commons with PMA; and (3) Cumulative Projects in the PMA with PMA. The results of these comparisons, shown in Table 36, are discussed below:

Table 36
 COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY
 EATING AND DRINKING FACILITIES
 LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
 2007-2012

	<i>In Square Feet GLA</i>				
	2008	2009	2010	2011	2012
Total Supportable Eating & Drinking Space by PMA Residents	19,517	25,606	39,256	64,489	86,510
Projected Supply of Additional Eating & Drinking Space					
PROPOSED PROJECT					16,000
Other Competitive Center at 60th Street West and West Avenue L (The Commons)					13,425
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L					29,425
Other Proposed Space in PMA					65,132
Grand Total, All Proposed Eating and Drinking Facility Space					94,557
Comparison 1: Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					18%
Comparison 2: Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space by PMA Residents					34%
Comparison 3: Projected Total Supply of Space as a Percent of Total Supportable Space by PMA Residents					109%

Source: HR&A Advisors, Inc.; W & W, Inc.

- **Project with PMA:** The Project's Eating and Drinking Facility space of 16,000 square feet GLA represents only 18 percent of the potential growth in PMA resident demand in 2012, and therefore does not raise any urban decay issues;
- **Project and The Commons with PMA:** The two projects together will provide space sufficient to accommodate 34 percent of the total growth in PMA resident demand for this category by 2012, and also do not raise any urban decay issues;

Table 37
 COMPARISON OF PROJECTED INCREASE IN DEMAND WITH PROJECTED INCREASE IN SUPPLY, EATING AND DRINKING FACILITIES
 LANCASTER SHOPPING CENTER PRIMARY MARKET AREA (PMA)
 2007-2013

	<i>In Square Feet GLA</i>					
	2008	2009	2010	2011	2012	2013
Total Supportable Eating & Drinking Space by PMA Residents	19,517	25,566	39,256	64,489	86,510	108,765
Projected Supply of Additional Eating & Drinking Space						
PROPOSED PROJECT					16,000	16,000
Other Competitive Center at 60th Street West and West Avenue L (The Commons)					13,425	13,425
Subtotal, Supply of Space, Combined Centers at 60th Street West and West Avenue L					29,425	29,425
Other Proposed Space in PMA					65,132	65,132
Grand Total, All Proposed Eating and Drinking Facility Space					94,557	94,557
Comparison 1: Proposed Project Space as a Percent of Total Supportable Space by PMA Residents					18%	15%
Comparison 2: Projected Supply of Space at the Two Centers at 60th Street West and West Avenue L as a Percent of Total Supportable Space by PMA Residents					34%	27%
Comparison 3: Projected Total Supply of Space as a Percent of Total Supportable Space by PMA Residents					109%	87%

Source: HR&A Advisors, Inc.; W & W, Inc.

- **Cumulative Projects with the PMA:** The cumulative proposed supply from all developments represents 109 percent of total growth in PMA demand in 2012, but as shown in Table 37 below growth in demand substantially exceeds supply by 2013.

Based upon (1) the results of the comparisons between growth in demand and projected additions to supply, (2) the relatively small proportion of future supportable space that is represented by the Project’s and The Commons’ Eating and Drinking Facilities, and (3) the limited importance that is placed on restaurants in most of the proposed developments in that they are not anchor tenants and do not occupy significant amounts of space, it can be concluded that the development of additional Eating and Drinking Facility space as currently projected is not likely to have a major impact on the existing base of restaurants in the local market area. Therefore, it may be concluded that the development of additional Eating and Drinking space as presently proposed will not contribute to adverse market conditions that could lead to urban decay.

H. Evaluation of the Project’s Potential to Cause Urban Decay

Based on the foregoing analysis, the proposed Project would be a significant source of new competitive supply of retail space in a number of the retail space categories that have been evaluated in this study. However, analysis of each retail category suggests that with two exceptions — Building Materials/Garden Supply space and Drug Store/Pharmacy space — market growth in demand for retail and dining space within the relevant market areas surrounding the Project will be sufficient to absorb the additional supply from the Project and other proposed centers by 2014. As a result, it is unlikely that the short-term oversupply will create conditions that could result in extreme economic competition leading to the threat of “urban decay.”

More specifically, the analysis of potential impacts has revealed the following:

- **Sources of Market Support.** The PMA for the Project is an historically fast-growing residential community of single-family detached homes occupied by residents whose incomes are higher than the Los Angeles County average. Between 2007 and 2012 the

resident population of the PMA — defined as those residents living within five miles of the Project-- is forecasted to increase by 13,254 persons, and should provide the major source of market support for the Project. In addition, the Project's location, coupled with its anchor stores and the presence of an adjacent retail development known as The Commons at Quartz Hill, should allow for it to draw additional market support from the SMA, defined here as the resident population living within a five- to 10-mile band around the Project site. According to recently updated forecasts, between 2007 and 2012 the SMA is projected to grow by 18,017 persons and contribute 30 percent of the total market support for the Shopper Goods and Building Materials/Garden Supply space at the Project.

The growth forecasts have been examined from both an historical perspective, recent changes in the national and regional economy, and from a review of proposed developments in the market areas. A recent listing of planned developments suggests that about 9,800 units have been proposed for development in the PMA alone that could generate population growth over 29,000 persons. While the actual timing and delivery of this product is open to some question due to the downturn in the housing market and economy in general where mortgage foreclosures have spiked and access to mortgage debt has become more difficult, the forecasts appear to be realistic in their expectation that major growth is likely to continue in the Antelope Valley subregion after the current recession and extend well beyond 2012.

- ***Competitive Supply Considerations.*** As noted above, in addition to the Project there is a proposed development known as The Commons at Quartz Hill that would be developed at the same intersection that would initiate operations in the same full calendar year, 2012. As presently conceived these two developments together would add a total of 761,731 square feet GLA of retail space. Given their proximity and timing, they will likely function as one large project in terms of their potential drawing power in the local market areas. Effectively, the juxtaposition of these two centers should allow them to achieve “agglomerative” benefits in that the range of choice provided by the combined retail offerings at the two sites should enhance the location as a retail destination for SMA residents and enhance this location’s customer drawing power beyond the normal market reach of a single 400,000 square foot GLA community shopping center.
- ***Shopper Goods (General Merchandise, Apparel, Home Furnishings, Other/Specialty Goods.*** The analysis of Shopper Goods considered three different measures of comparison between potential market support for new retail space and potential future competitive supply. These three comparisons were as follows:
 - **Comparison 1:** Project’s proposed Shopper Goods space with growth in PMA resident support for additional space;
 - **Comparison 2:** Combined Project and The Commons Shopper Goods space with the combined PMA and SMA growth in resident support for additional Shopper Goods space; and

- **Comparison 3:** Total proposed Shopper Goods space (Project and 13 other proposed retail developments) with the combined growth in PMA resident and SMA resident support of additional retail space.

The results of the first of these comparisons indicate that the Project's Shopper Goods space can be supported by the PMA, as it would provide the equivalent of 49 percent of the PMA's potential supportable Shopper Goods space. In the second comparison, the analysis shows that the combination of the Project and The Commons would provide an amount of space that would constitute the equivalent of 91 percent of potential growth in demand generated by the combined PMA and SMA resident markets. In the final comparison, the total Shopper Goods from all proposed projects represents 118 percent of the projected demand from the combined PMA and SMA resident markets in 2012, though there would be more than adequate support for the proposed space by 2013. Thus, while the Project and The Commons together would leave little capacity for additional new General Merchandise space in the PMA, it is unlikely that they would individually or collectively create adverse market conditions that could lead to urban decay. In addition to the results of the comparative analyses, this conclusion is based on the following considerations.

- The market demand for Shopper Goods in the PMA and SMA is growing with the development of the residential base, and by 2012 the annual growth in additional supportable Shopper Goods space should exceed 100,000 square feet GLA. Accordingly, if there is excess supply, it would likely be a short-term phenomenon that would be resolved from growth in resident demand by 2013, thus within the second calendar year after the Project is planned to be fully operational.
- The proposed major Shopper Goods anchor tenants for the two centers to be located at the intersection of 60th Street West and West Avenue L generally are already well-established in the Antelope Valley. If the two projects draw sales from other establishments it is likely that this "cannibalization" will come largely from their own existing stores. Presumably, this potential loss in sales has already been considered in each anchor store's decision to place a new store at this location.
- The threshold sales requirement for Shopper Goods that has been utilized in the analysis has been set at a level equivalent to the magnitudes achieved by mature stores, thus may be conservative (i.e., too high) in the short term for a market area that is undergoing significant growth, particularly in the current economic climate where sales per square foot have declined for many retailers. Moreover, normally, there is a "ramp-up" period where stores take several years to achieve threshold sales levels, particularly in rapid-growth residential markets like the Antelope Valley. The anchor stores that are locating at this position in the market also appear to be making a strategic choice to establish new outlets in advance of the long-term demand that will ultimately be present in the growing community, and in their planning may have allowed for lower than typical sales performances in the first few years of operation.
- Developers of potentially competitive projects will have the option to delay or otherwise adjust their development programs to reflect evolving market conditions,

particularly in recognition of the strength of the anchor tenants that will be present at the Project and The Commons. Moreover, recent trends in the housing market may have a significant impact on the timing of some or all of the new retail projects, as their development in all likelihood will be correlated with the presence of new residents in the market areas.

- ***Building Materials and Garden Supplies.*** The analysis of Building Materials and Garden Supplies retail space follows the same basic approach that was utilized for the Shopper Goods analysis, recognizing that shopping behavior for this type of good will likely attract significant sales from beyond the PMA, particularly from non-local builders constructing projects in the vicinity. Once again, three basic comparisons were made between the projected growth in market demand for supportable space and the proposed supply of new space following the comparative framework noted above for Shopper Goods. The results of these comparisons were as follows:
 - **Comparison 1:** The total space for these goods proposed for development at the Project represents more than double (191 percent) the projected increase in PMA demand over the period 2007 through 2012. Clearly, additional market support for this space will need to come from beyond the PMA and even the SMA if the home improvement center is to reach the sales standards utilized in this analysis to define successful market performance in its early years of operation. However, as noted below, growth in demand should resolve this problem by 2015.
 - **Comparison 2:** The proposed cumulative supply of Building Materials and Garden Supply space from the combined Project and The Commons would represent 151 percent of the amount of supportable space that would be generated by growth in market area demand from the combined PMA and SMA for the period 2007-2012. Projections of future increases in PMA and SMA demand after 2012 suggest that demand and supply would be in balance by the year 2015, provided that there were no other major additions of space in the market during that period.
 - **Comparison 3:** Projected growth in supply from known competitive sources presently include the addition of a 170,000+/- square foot Lowe's Improvement Center at a shopping center undergoing development that is located at the intersection of West Avenue K and 60th Street West as well as the space proposed at the Project and The Commons. This home improvement center is to be completed in the second phase of that center, thus scheduled for opening in 2014. Under these conditions, in 2014 the projected increase in supply would represent more than double the supportable space from growth of additional demand generated by the PMA and SMA resident markets.

Assessment of the potential for urban decay caused by an oversupply of Building Materials and Garden Supplies space needs to recognize that the potential oversupply problem would be caused by the cumulative impact generated by the construction and operation of three

separate developments²⁷. Under current circumstances, the total supply of additional space would come from the Project (171,038 square feet GLA, 47 percent of the total new space), The Commons (21,624 square feet GLA, 6 percent of the new space) and the West Avenue K/60th Street West center (171,069 square feet GLA, 47 percent of the new space). Given these relative shares of space, it can be seen that the problem of a potential significant oversupply of Building Materials and Garden Supply space arises with the possible development of two major home improvement centers in the PMA during the next five years in a market that likely can support only one such facility at the proposed size of 170,000 square feet GLA.

Perhaps the major question that cannot be resolved in this analysis is whether or not the development of the two proposed home improvement centers is actually a reasonable proposition in the next five to seven years in the PMA at the two locations that have been identified to date. While it was not possible to confirm the identity of the home improvement center operator at each site²⁸, the similarity of location, similarity of proposed building configuration and recent change in timing of the home improvement center at the West Avenue K/60th Street West location to a second phase in the future (2014) suggests that the two projects may have the same operator in mind, or, at a minimum, the developers will carefully consider the potential competitive circumstances presented by other projects before proceeding with such a commitment.

Considering the possible oversupply problem that would result if two major home improvement centers were developed in the PMA over the next five years, it is the judgment of this Consultant that only one major home improvement center will be built in the foreseeable future on 60th Street West, and that the superior location for such a retailer is the Project site. However, if both proposed projects do proceed with a home improvement center as currently conceived, the Project will likely seize an important competitive advantage if it is the first to complete such a facility and put it into operation. Moreover, the onus of causality for urban decay would logically fall on the West Avenue K/60th Street West site, as it would be the development that could finally create the condition of oversupply.

- **Convenience Goods.** Two types of Convenience Goods space were considered in this analysis: (1) Food and Beverage facilities; and (2) Drug Store/Pharmacy space. Each category is reviewed below.

1. Food and Beverage Facilities

The comparisons of projected growth in demand with projected additions to supply indicated that there will be ample support in 2012 for the 27,000 square feet GLA of Food and Beverage space at the Project as well as the 45,376 square feet GLA proposed for development at The Commons. However, the third comparison which evaluated the

²⁷ There are actually four developments that contribute to this supply, but one of these — the space from the center listed as project #7, Table 14 — has already been completed and is in operation, thus is effectively part of the existing supply.

²⁸ The operator of the home improvement center at the West Avenue K/60th Street location was identified in 2007 as Lowe's. The developer of the Project has indicated that the identity of its home improvement center is confidential at this time.

projected increase in demand with the combined space from all 14 retail developments under consideration in the PMA indicated that there would likely be an oversupply of 19,905 square feet GLA of Food and Beverage space by 2012 if current development schedules were maintained. Further analysis suggests that the anticipated growth in market demand should be sufficient to support all the proposed space by mid-2013, thus obviating any major concern that this short-term oversupply could lead to potential forces that promote urban decay.

2. Drug Store and Pharmacy Space

In contrast to the evaluation of other retail space categories, which suggests that growth in market demand will likely support proposed changes in supply by 2013, if all the proposed drug store and pharmacy space is completed as currently conceived in the 14 centers reviewed in this analysis there will likely be a major oversupply of this type of space that will not easily be accommodated by continued growth in demand. Starting first with Project, it should be noted that the developer proposes to provide two drug store/pharmacy facilities, one on a free-standing pad and the second within the Target Department Store. In total, the two outlets would provide 18,872 square feet GLA, an amount that is equivalent to 85 percent of the projected growth in supportable drug store space in the PMA between 2007 and 2012. Similarly, the developer of The Commons also proposes two drug store/pharmacy facilities, thus bringing the number of such stores to four and the total square footage to 34,436 square feet GLA at the intersection of West Avenue L and 60th Street West. While projected growth in market demand should reach levels sufficient to adequately support this amount of space by 2014, there are six additional major drug stores proposed in other developments (see Table 14) for the PMA that could add another 87,771 square feet GLA of drug store space to the market by 2012; taken together with the Project and The Commons, they represent more than four times the amount of space that can be supported by projected market area growth between 2007 and 2012 as defined in this analysis.

Given the abundance of proposed drug stores, field surveys were conducted in order to better understand the locational attributes of existing and proposed drug store facilities in and adjacent to the PMA that could be affected if all these new drug stores are actually built. The pattern that emerges is one that suggests for the most part that the proposed stores are not intended to serve the needs of the growing residential population on sites that are conveniently located near these store sites. Rather, the locations of the proposed drug stores suggest that a primary factor driving the development of these facilities is the competition for visibility and market share between major drug store chains seeking advantageous locations in the Antelope Valley Freeway corridor near the Antelope Valley Hospital and Medical Center and the Lancaster Community Hospital. These two hospitals already serve as a strong magnet for doctors' offices and related medical service businesses that serve the health care needs of the Antelope Valley. Filed investigation identified at least five existing major chain drug stores on their own sites and two additional chain drug stores "imbedded" within supermarkets — seven facilities in total—located within a 1.5 mile radius of the Antelope Valley Hospital. This clustering pattern would be continued if four of the proposed drug stores — those contained in projects # 8, #10, #11 and #12 in Table 14 — were developed as currently proposed.

Given that these decisions are being made by major chain store operators, it is unlikely that their individual or collective failure would create conditions of urban decay, as (1) they are not serving as “lynchpins” to urban districts or shopping centers, and (2) if they fail, their space can be recycled to serve other uses.

The two remaining planned drug stores (projects #1 and #2 in Table 14) are in shopping centers proposed for development along Avenue K. If developed per the current schedule they would likely encounter significant competitive issues with the cluster of facilities located around Antelope Valley Hospital as well as from other existing stores and the new facilities at the Project and The Commons. However, neither of these projects has finalized its building program. Also, each center has multiple anchor tenants, and therefore would likely survive the failure of the drug store component without suffering conditions leading to full-scale urban decay.

The projected supply-demand imbalance and resultant competition for customers could also have an impact on existing drug stores and on those centers where drug stores serve as important “anchors” or customer “draws”. Those retail centers considered most at risk would be older drug store facilities found at inferior locations or in existing or proposed convenience centers where a major drug store was the exclusive or dominant anchor tenant. In such circumstances, the failure of the “anchor tenant” drug store could lead to a major decline in patronage at the center, resulting in the failure of in-line tenants who were dependent on the drug store’s drawing power.

Recognizing that the potential oversupply could impact existing drug store-anchored shopping centers, field surveys and related research were conducted to determine which drug stores, if any, would be most vulnerable to extreme competition if all or most of the proposed drug store space was developed at the intersection of 60th Street West and West Avenue L. Four existing stores located westerly of the Antelope Valley Freeway commercial corridor within the PMA are considered most at risk, including the following facilities:

CVS	4105 West Avenue L	Lancaster
Walgreens	2840 West Avenue L	Lancaster
Sav-on	5038 West Avenue N	Palmdale
Rite Aid	3105 Rancho Vista Boulevard	Palmdale

Analysis of each drug store’s susceptibility to conditions of extreme competition is provided below.

- CVS. This drug store is the one located closest to the Project at a shopping center known as Quartz Hill Town Center. The site is located about two miles east of the Project on West Avenue L, the major east-west regional arterial street that will provide major access to both the Project and The Commons. The CVS store serves as a co-anchor with a Von’s supermarket that has an imbedded Sav On Pharmacy. It is a newer shopping center that enjoys a high occupancy rate for its available space. Many of the existing spaces are occupied by services and office-users. Given its existing and projected local market base, accessibility, age, configuration, tenant mix

- and the presence of anchor stores, this center is not considered at great risk to lose its pharmacy and be negatively impacted by development of the Project to such a degree that it would lead to conditions of urban decay.
- Walgreens. The Walgreens is a newer drive-through store located as a “stand-alone” project at the southeast corner of the intersection of West Avenue L and 30th Street West opposite the West Lancaster Plaza Shopping Center. The site has excellent accessibility and visibility. If it were to close due to extreme competition, the building and its location would be attractive to other retailers. As the store does not anchor any other retail space, its possible closure should not materially impact other retailers.
 - Sav-on. The Sav-on facility co-anchors (with Albertson’s) a recently-developed convenience shopping center located at the intersection of Avenue N and Rancho Vista Boulevard in the City of Palmdale. The location is at a key intersection with high traffic volume and excellent visibility. Moreover, the center’s performance is likely to improve substantially with additional residential development in the immediate vicinity in the near future. Given the center’s location, visibility, co-anchorage and relative age, the likelihood of its being severely impacted to such an extent that there would be store closures and urban decay is minimal.
 - Rite Aid. The Rite Aid store is located five miles from the Project at the intersection of Sierra Vista Boulevard and 30th Street West, thus it is at the edge of the Project’s PMA. The drug store serves as a co-anchor with a Von’s supermarket at a well-established, modern convenience center known as Rancho Vista Plaza. Given this center’s location, visibility, accessibility and design configuration, it is not likely to be materially impacted by development of the Project and suffer from the effects of extreme competition.

Summarizing the assessment of existing drug stores in the PMA, the site-specific analyses indicate that while there could be a serious oversupply of drug store/pharmacy space in the Project’s PMA if the Project and The Commons open as currently scheduled, this oversupply is not likely to create conditions at any of the specific locations studied that would likely lead to significant urban decay. The four major drug store chains with stores in the PMA identified above are all capable of holding on to their market shares for the long term, due both to their brand strengths and to their respective geographic positioning. However, it is also very possible that the sales achieved per square foot at these stores may fall below the standard threshold utilized in this analysis for determining supportable drug store space.

- ***Eating and Drinking Facilities.*** Analysis of the potential impact of the proposed Eating and Drinking Facility component of the Project indicates that there is sufficient market support generated by the PMA resident population and other market sources to fully support the proposed addition of this type of space by 2013. As the addition of the proposed eating and drinking uses in the Project represents such a small share of the total space that it will not have a significant negative impact on the existing and proposed supply of existing restaurant uses in the PMA, this component of the Project will not lead

to urban decay at any of the existing or proposed shopping centers and business districts found in the competitive market area.

Overall, this analysis concludes that, while the Project together with other new shopping centers will add new competitive retail and restaurant facilities to the Antelope Valley region, there is no reasonable likelihood that the operation of the Project and the other projects identified in this analysis as they are presently conceived, would result in significant adverse economic competition to the degree that this competition would lead to urban decay.²⁹

²⁹ This includes consideration of the commercial district located at the intersection of Avenue M/Quartz Hill Road and 50th Street West in the unincorporated community of Quartz Hill, approximately 1.4 miles from the Project. Anchoring this district are a number of local-serving institutions, including County facilities (fire station and library) as well as a post office and an elementary school. Existing businesses include: an Antelope Valley Bank branch; animal hospital; several veterinary clinics; mini-storage facilities; equipment rental; feed and tack stores; garden center; building supplies; beauty salons; fitness/karate facilities; casual eating and drinking facilities; and numerous automobile-oriented businesses, including service stations, auto repair garages, automotive painting, and auto parts and muffler stores. These businesses offer goods and services that are substantially different from those planned for the Project, though there could be limited overlap, depending on the Project's specific retail or service businesses when the Project is fully leased. Moreover, the district has no dominant business or group of stores that anchors it and is similar to the Project. Therefore, any limited competition between the Project and any individual store(s) in the district would not have an impact on the district so severe that it could foreseeably lead to "urban decay" within the meaning of CEQA.

APPENDIX A

**Summary Qualifications of HR&A Advisors, Inc. and
Whitney & Whitney, Inc.**

QUALIFICATIONS TO PREPARE CEQA/NEPA DOCUMENTATION ON SOCIOECONOMIC ISSUES

HR&A Advisors, Inc. (HR&A) is a full service policy, financial and management consulting firm. Founded in 1976, the firm has a distinguished track record of providing realistic answers to complex economic, economic development, public finance, real estate, housing and strategic planning problems. HR&A clients include Fortune 500 corporations, all levels of government, the nation's leading foundations, and not-for-profit agencies. The firm has extensive experience working for the legal community in such roles as court-appointed special master, consent decree monitor, technical advisor and expert witness.

HR&A's practice lines include local and regional economic analysis, economic development program formulation and analysis, fiscal impact analysis, real estate analysis and advisory services, housing policy research and analysis, population forecasting and demographic analysis, and transportation and other capital facilities analysis and financing.

Among the qualities for which HR&A is widely known and respected are the impeccable quality of its analysis, ability to invent new analytic methods and approaches to suit the needs of a particular client, independent professional judgment honed through extensive exposure to the rigors of the public review process and the scrutiny of the judicial system, the ability to translate complex technical analysis for a variety of non-technical audiences, and the extensive involvement of its Partners in every project it accepts.

The firm's domestic and international consulting is provided by a staff of 30 people located in offices in Los Angeles and New York. Staff members include public finance professionals, planners, economists, architects, lawyers, and experienced project managers. Virtually every member of the firm has substantial public or private sector experience in economic, financial and policy analysis, real estate development and planning.

HR&A has frequently been called on by its public and private sector clients to provide analysis of population, housing, employment, economic, public school facilities and induced growth impacts for projects subject to the California Environmental Policy Act and the National Environmental Policy Act. The following are examples of projects that illustrate this experience.

For Public Sector Clients

- For the City of Lancaster, HR&A is preparing economic, fiscal and “urban decay” analysis for EIRs on the Lane Ranch Towne Center and The Commons at Quartz Hill, two regional shopping centers planned for opposite corners at 60th and Avenue L.
- For Los Angeles World Airports, HR&A prepared all of the economic impact analyses needed to evaluate alternative Master Plan concepts for future development of Los Angeles International Airport. The project included extensive econometric modeling of future baseline (pre-project) economic conditions and forecasts of conditions under alternative development scenarios in the City of Los Angeles, the County of Los Angeles, incorporated and unincorporated areas adjacent to the airport, and the surrounding five-county region.
- For the City of Chicago Department of Aviation, HR&A prepared regional and local economic and fiscal impact analyses of the O'Hare Modernization Program (OMP), which was used by the Federal Aviation Administration to prepare an Environmental Impact Statement on the project. The analysis includes econometric modeling of the six-county Chicago regional area to forecast the employment, total economic output, population and households, among other factors, that would be associated with the \$16-billion OMP project, as compared with a No Project scenario.
- For the City of Los Angeles Environmental Affairs Department, HR&A prepared draft Initial Study screening criteria, thresholds of significance and recommendations for analysis approach on the topics of housing, population and employment impacts.
- For Central City West Association and the City of Los Angeles, HR&A prepared a demographic portrait and forecast, and baseline "jobs/housing balance" analysis as part of the Central City West Specific Plan, a transitional neighborhood located directly north of Pico-Union, and across the Harbor Freeway, from the Los Angeles central business district. HR&A's analysis was used as the technical basis for the population, housing and employment sections of the EIR on the Plan. The firm also assisted counsel for interested parties regarding these issues during subsequent litigation over the adequacy of the Final EIR, which was ultimately decided in favor of the City.
- For the Santa Monica-Malibu Unified School District, HR&A managed a detailed review of the options available to the District to consolidate use of its four properties in the Ocean Park neighborhood of Santa Monica, an area which had been experiencing significant enrollment declines. The project included managing the preparation and certification of an EIR on the multi-site strategy adopted by the Board of Education, which included construction of the first new elementary school since the 1950s.
- For the University of California, Los Angeles, the firm prepared an analysis of the degree to which employment and housing associated with UCLA's 1991 Long Range Development Plan was consistent with the emerging regional planning concept of "jobs-housing balance." The firm's analysis was included as a technical appendix to the Final EIR on the Plan, which received approval by the Regents of the University.
- Also for the University of California, Los Angeles, HR&A prepared the population and housing section, and contributed to the induced growth section of the EIR on the 2000-2010 Long-Range Development Plan Update for the campus. The Final EIR was certified by the Regents.
- For the University of California, Santa Barbara, HR&A analyzed the public school impacts of the 1992 Long-Range Development Plan for the Santa Barbara campus, and prepared a Supplemental Environmental Impact Report on this issue, pursuant to a judgment against the University in an action brought by the Goleta Union School District. The Supplemental EIR was certified by the Regents of the University. Upon return to the writ, the court found that the analysis adequately supported the Regent's action. This determination was upheld by the Second District Court of Appeal in *Goleta Union School District v. Regents of the University of California*, 36 Cal. App. 4th 1121 (1995) (opinion on rehearing), holding that the University was not required to pay school mitigation fees.

- For the Southern California Association of Governments (SCAG), HR&A prepared the economic and fiscal impact sections of the EIR on SCAG's 1996 Regional Comprehensive Plan and Guide.

For Private Sector Clients

- For Westfield Corporation, HR&A prepared "urban decay," economic and fiscal impact analyses for a number of expansions and new construction of Westfield super-regional shopping centers in Southern California, including Westfield Century City, Westfield Santa Anita, Westfield Fashion Square (Sherman Oaks), The Village at Westfield Topanga, Westfield Palm Desert, Westfield University Towne Center (San Diego), and Westfield North County (Escondido).
- For the University of Southern California, HR&A is preparing employment, housing, population, retail "urban decay," economic and fiscal impact analysis for a mixed-use (academic facilities, student and faculty housing, retail, hotel) Specific Plan to implement USC's long-range development plan for its academic campus in Los Angeles.
- For Fifteen Group Land and Development, HR&A is preparing employment, housing, population, retail "urban decay," economic and fiscal impact analysis for a 4,000-unit mixed-income housing, office and retail mixed-use development in the Boyle Heights community of Los Angeles.
- For Wilson Meany Sullivan, HR&A prepared employment estimates, "urban decay" analysis for retail uses, economic and fiscal impact analysis for a major mixed-use development (3,500 mixed-income housing, retail and office) to be developed on the site of the Hollywood Park race track in the City of Inglewood.
- For Bisno Development Company and Ponte Vista Partners, LLC, HR&A is preparing technical reports on the population, housing employment and school facilities impacts of a 2,300-unit condominium project proposed for a former US Navy housing site in the San Pedro-Wilmington area of Los Angeles.
- For General Growth Properties, HR&A prepared detailed comments on various socio-economic issues in the Draft and Final EIR for the Americana at Brand, a "lifestyle" mall proposed for a site immediately adjacent to the Glendale Galleria in Glendale.
- For Universal Studios, Inc., HR&A analyzed the employment, housing, population and economic and fiscal impacts in Los Angeles County of a proposed \$3 billion Specific Plan that will nearly double the intensity of development at Universal City, the home of Universal Studios, Inc.'s film studio, studio tour, various entertainment retail uses, commercial office buildings and hotels. HR&A is now preparing similar analyses for the EIR on the new Universal City Vision Plan being proposed by NBC Universal.
- For the Ratkovitch-Villaneuva Partnership, HR&A prepared the employment, housing, population and public schools impact analyses for the EIR on a proposal to construct 10 million square feet of new commercial and residential development around the City of Los Angeles' Union Station. The Draft EIR was certified by the Los Angeles City Council.
- For St. John's Hospital and Health Center, HR&A prepared analyses of the economic and fiscal impact of current health center impact on the economy of the City of Santa Monica, and the impact that will result from each of two phases of a major reconstruction of the health center following the 1994 Northridge earthquake. The analysis was relied on by the City's consultants in preparing the project's EIR, which was certified by the Santa Monica City Council. HR&A also prepared analysis for the Health Center on the degree to which draft police services mitigation measures being considered by the City met the requirements of CEQA.
- For The Walt Disney Company, HR&A prepared a comprehensive analysis of the employment, population, housing, "jobs-housing balance" and vehicle miles traveled impacts of Downtown Disney and Disney's California Adventure, in Anaheim. The firm's analysis is contained in a series of technical appendices to the EIR, which was certified by the Anaheim City Council.

- Also for The Walt Disney Company, HR&A analyzed the "jobs-housing balance" implications of a proposal to consolidate all of Disney's studio and studio-related administrative facilities on a single site in the City of Burbank. HR&A's analysis was included as a technical appendix to the project's EIR, which was certified by the Burbank City Council.
- For Wilshire-Barrington Associates, HR&A analyzed the population, housing, employment and jobs-housing balance impacts of a preliminary concept for converting the Barrington Apartments in West Los Angeles into a mixed-use project consisting of 700 apartments, a 262-room hotel, 210,000 s.f. of office space plus miscellaneous retail.
- For the Santa Monica Beach Hotel Development Partnership, HR&A coordinated an extensive review and prepared the Draft EIR comment letter for the developer of a proposed 160-room luxury hotel and community center proposed for a parcel of State-owned land along Santa Monica Beach.
- For Reliance Development Group, HR&A coordinated an extensive review and prepared the Draft EIR comment letter for the developer of a 1.8 million square foot office park and studio complex proposed for surplus land at Santa Monica Airport.
- For Maguire Thomas Partners, HR&A coordinated an extensive review and prepared the Draft EIR comment letter for the developer of a proposed office building and hotel project to be developed on Ocean Avenue in the City of Santa Monica.

REPRESENTATIVE LIST OF CLIENTS

Financial Institutions & Investment Companies

American Council on Life Insurance
Citibank Private Banking Group
Citicorp Real Estate, Inc.
Community Preservation Corporation
First Union National Bank
Fleet Financial Group
Goldman Sachs
Hartland Asset Management
Lehman Bros.
Shorebank Corporation

Real Estate Development Organizations and Private Companies

ARC Development
ARCORP Properties
Bermant Development Company
Boeing Realty Corporation
Casden Properties, Inc.
Castle & Cook Development Company
Centex Homes
Continental Development Corporation
Daniel Island Development Company
Disney Development Corporation
Edward J. Minskoff Equities
Gaylord Entertainment
General Growth Properties
Gibson Speno LLC
Home Depot Company
JMB Urban Realty Corporation
K. Hovnanian Companies of California
Landmark Land Company
Madison Square Garden
Maefield Development Corporation
Maserich Company
Maguire Thomas Partners
Millennium Partners
Newhall Land & Farming Company
New York Times Company
Olympia & York (USA)
The Related Companies
Reliance Development Group
Santa Monica Beach Development Corporation
Starrett Housing Corporation
Sunset Development Corporation
Tishman Speyer Properties
Trammell Crow Company
Trammell Crow Residential
TransAction Companies, Ltd.
Twentieth Century Fox
Universal Studios, Inc.
The Walt Disney Company
Westfield Corporation, Inc.
William Lyon Homes

World Financial Properties

Public Development Agencies

Alliance for Downtown New York
Battery Park City Authority
Brooklyn Bridge Park Development
Brooklyn Navy Yard Development Corporation
Catskill Watershed Corporation
Catholic Charities of Brooklyn
Cincinnati Business Committee
Columbus Downtown Redevelopment Corporation
Downtown Brooklyn Local Development Corporation
Economic Development Growth Enterprises, Oneida Co., NY
Empire State Development Corporation
Inland Valley Development Agency
Memphis Riverfront Development Corp.
National Capital Revitalization Corp.
New York City Economic Development Corporation
New York State Urban Development Corporation
Penmar Development Corporation
Port Authority of New York and New Jersey
Queens West Development Corporation

Cultural, Recreational & Special Events Clients

American Museum of Natural History
Brooklyn Academy of Music Corporation
Brooklyn Museum of Art
City of New Haven Arts & Entertainment Facilities Committee
Lincoln Center for the Performing Arts
Madison Square Garden
New Jersey Performing Arts Center NYC2008
Public Space for Public Life
Randall's Island Sports Foundation
The Trust for Public Land

Other Quasi-Public and Non-Profit Organizations and Foundations

Apartment Association of Greater Los Angeles
The Bowery Mission
Common Ground Community
Cornell University
Corporation for Supportive Housing
Community Services Society of New York

Other Quasi-Public and Non-Profit Organizations and Foundations (con't.)

The Enterprise Foundation
Ford Foundation
Gay Men's Health Crisis
Griffiss Local Development Corporation
Harry Frank Guggenheim Foundation
Kaiser Permanente
Local Initiatives Support Corporation
Los Angeles Collaborative for Community Development
Metropolitan Boston Housing Partnership
Metropolitan Jewish Geriatric Center
National Equity Fund
Neighborhood Progress, Inc.
New York Blood Center
Newark Alliance
Saint John's Hospital and Health Center
Saint Vincent's Hospital
San Gabriel Valley Council of Governments
Spanish-American Merchant's Assoc.
University of California, Los Angeles
University of California, Santa Barbara
Upper Manhattan Empowerment Zone Development Corp.
Williamsburg Affordable Housing
Westside Urban Forum

Governmental Agencies

Boulder Urban Renewal Authority
City of Berkeley Rent Stabilization Board
City of Beverly Hills
City of Chester (PA)
City of Columbus
City of Culver City (CA)
City of Detroit
City of Houston
City of Huntington Beach (CA)
City of Indianapolis
City of Lancaster
City of Los Angeles
City of New York
City of Olathe (KS)
City of Phoenix
City of San Luis Obispo (CA)
City of Santa Monica
City of West Hollywood (CA)
City of Yonkers
Community Redevelopment Agency of the City of Los Angeles
Compton Unified School District (CA)
County of Santa Barbara
District of Columbia
New Jersey Department of Commerce and Economic Development

Redevelopment Authority of the City of Philadelphia
San Diego Association of Governments
Santa Ana Unified School District (CA)
Santa Monica-Malibu Unified School District
Southern California Association of Governments
Yonkers Office of Downtown & Waterfront Development

Transportation Agencies

City of Chicago Department of Airports
Connecticut Dept. of Transportation
Delaware Dept. of Transportation

Los Angeles County Metropolitan Transportation Authority
Los Angeles World Airports
Massachusetts Bay Transportation Authority
New Jersey Transportation Corp.
New York Metropolitan Transportation Authority
San Diego County Regional Airport Authority
U.S. Dept. of Transportation

Housing Agencies

Chicago Housing Authority
Community Redevelopment Agency of the City of Los Angeles
Cuyahoga Metropolitan Housing Authority (IN)
Detroit Housing Commission
Housing Authority of Baltimore City
Housing Authority of the City of Houston
Housing Authority of the County of Los Angeles
Housing Authority of the City of Santa Monica
Housing Bureau, City of Long Beach
Indianapolis Housing Authority
Los Angeles Housing Department
New York City Housing Authority
New York City Housing Development Corporation
New York State Housing Finance Agency
Omaha Housing Authority (NE)
Philadelphia Housing Authority
Redevelopment Authority of the City of Philadelphia
St. Louis Housing Authority (MO)
United States Department of Housing and Urban Development

WHITNEY & WHITNEY, INC.
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Whitney & Whitney, Inc. (W&W) is a real estate development advisory services firm located in Los Angeles, California. The company was founded by William H. Whitney, Ph.D. in 1984. After six years of serving the southern California and Hawaii markets, W&W reduced the scope of its activities when Mr. Whitney was recruited by Arthur Andersen to assist their Real Estate and Hospitality/Leisure consulting practices in establishing both a national and international presence.

Mr. Whitney served with Arthur Andersen for over nine years, participating on major real estate and hospitality consulting engagements in over 40 different countries throughout the world. Activities during this period also included starting Arthur Andersen's Asia/Pacific Region real estate consulting practice in Manila, and spending three years in Andersen's London offices serving as a resource for the European and Middle East real estate consulting practices.

Following his return to the United States in March 2000 Mr. Whitney has re-activated Whitney & Whitney, Inc. The firm's major focus is on the provision of real estate consulting services to both public and private clients in the following areas:

- Due diligence services for companies involved with the acquisition and operation of real estate assets;
- Participation on multi-disciplinary teams with architects, planners and other design professionals in the planning of resorts, new communities and urban mixed-use projects
- Advisory services related to the maximization of returns from corporate real estate assets;
- Advisory services related to the maximization of public benefits from proper utilization of public lands;
- Market feasibility studies for large scale land development programs, including waterfront projects, shopping centers, resorts, and new communities;
- Master planning for large-scale urban parks and open space programs;
- Financial feasibility studies for proposed real estate investments;
- Negotiation assistance related to the formation and implementation of public/private partnerships;
- Fiscal impact, economic impact, cost-revenue and cost-benefit evaluations of proposed real estate development activities for public agencies and private developers;
- Valuation/expert witness services related to complex real estate transactions and/or arbitration and litigation proceedings; and
- Implementation services related to attaining necessary development entitlements and funding for real estate programs.

W & W's recent projects include the following: since the early 1990s has served as a real estate economic and financial advisor to the State of Hawaii Aloha Tower Development Corporation related to the redevelopment of the downtown Honolulu waterfront; performed a market and financial analysis of a proposed "high technology" park/mixed-use commercial development program in Dubai, United Arab Emirates known as Dubai Internet City; conducted an analysis of the economic feasibility of converting the 4,700-acre El Toro Marine Corps Air Station to an urban park; conducted an analysis of the redevelopment potentials for tourist-serving projects in the Old City of Shanghai; provided a market analysis of the retail redevelopment potential for the International Market Place in Waikiki for the Queen Emma Foundation; performed an evaluation of redevelopment potentials and the resultant fiscal impacts from conversion of certain industrial lands to retail and other uses for the City of San Jose; provided an evaluation of the market feasibility for residential and commercial retail uses on surplus lands owned by Ohlone Community College, Fremont, California; evaluated the market and financial opportunity for development of a major shopping center near Mililani Town on the Island of Oahu, Hawaii for Forest City; and reviewed the market for office and retail commercial uses near the East Eisenhower Transit Station for the City of Alexandria, Virginia; and a market study for a C. J. Segerstrom & Sons development project

located near South Coast Plaza in Orange County. Currently, the firm is serving as an advisor to Castle & Cooke on the preparation of a master plan and development strategy for 28,000+/- acres of land located on the North Shore of the Island of Oahu; providing a review of the master plan for the Sa'adiyat Island resort located in Abu Dhabi, United Arab Emirates; and preparing market/financial analyses and a business plan for a proposed destination spa to be located in the Santa Monica Mountains.

Mr. Whitney's background in the analysis of major shopping center developments and the planning of their adjacent lands supersedes the formation of W & W. He has been conducting investigations of retail development opportunities for nearly 40 years, starting with the re-use of the Chevron properties located in El Segundo and Manhattan Beach that ultimately led to the development of Manhattan Beach Village. One such project, the planning of the Puente Hills Mall and its immediate surrounding lands for the Western Harness Racing Association in 1970, was the inspiration for his doctoral dissertation, "An Investigation of Selected Impacts on Surrounding Lands Which are Generated by Development of Regional Shopping Centers" (UCLA, 1975).

A partial listing of Mr. Whitney's shopping center experience includes the following:

WESTFIELD CORPORATION: "Urban Decay" Analysis for Super-Regional Shopping Centers, California. In collaboration with HR&A Advisors, Inc., prepared "urban decay" analyses for a number of expansions and new construction of Westfield super-regional shopping centers in Southern California, including Westfield Santa Anita, Westfield Fashion Square (Sherman Oaks), The Village at Westfield Topanga, Westfield Palm Desert, Westfield University Towne Center (San Diego), and Westfield North County (Escondido).

ERNEST W. HAHN, INC. (NOW TRIZECHAHN): Regional Shopping Center Market Analysis and Economic/Fiscal Impact Studies, California and Washington

Conducted numerous market feasibility and economic/fiscal impact studies of proposed regional shopping centers for the Ernest W. Hahn Company, forerunner to TrizecHahn, including analyses for the following existing regional shopping centers: Puente Hills Mall, City of Industry; Mariner's Island, San Mateo; North County Fair, Escondido; Kelso Mall, Kelso, Washington; and Sierra Vista, Clovis, California.

PSB REALTY CORPORATION: Costa Mesa Courtyards, Costa Mesa, California

Performed market and financial feasibility studies for the Costa Mesa Courtyards, a 173,000 square foot shopping center once honored as the "Best Retail Development" in the Western States at the Pacific Coast Builders Conference. The 11-acre project has been an important stimulus to the revitalization of the City of Costa Mesa's old central business district.

JAMES YOUNGBLOOD, DEVELOPER: The Lumberyard, Encinitas, California

Conducted market and financial feasibility studies for the project, a specialty retail center with 80,000 square feet of retail space located in the City of Encinitas. The center has been successfully developed, and has performed at or above initial market expectations.

THE IRVINE COMPANY: Fashion Island and Spectrum Center Impact Studies, Newport Beach and Irvine, California

Conducted economic and fiscal impact evaluations of these two major centers as part of their submissions for general plan amendments to the Cities of Newport Beach and Irvine, respectively. The Fashion Island expansion program focused on the interactive benefits that could be generated between the existing and proposed retail uses and the surrounding hotel and office developments; in contrast, the central concern regarding the proposed Spectrum project was its potential sales and property tax generation for the municipality.

LIVERPOOL DEPARTMENT STORE AND THE FRANSEN COMPANY: Regional Shopping Center Market Evaluations, Various Metropolitan Areas, Mexico

Conducted detailed investigations of the market opportunities for Liverpool Department Store to serve as an anchor tenant and developer of regional shopping centers throughout Mexico. A number of sites in major metropolitan locations were evaluated, and projections were made of potential store sales and

supportable retail space. As of 2001, the study had resulted in one new shopping center currently operating in the Mexico City metro area and a second project under construction.

MITSUI TRUST & BANKING CO., LTD.: Aloha Tower Marketplace, Honolulu, Oahu, Hawaii

Provided a market validation study for a festival marketplace that was under construction in downtown Honolulu. The development program, which ultimately became the Aloha Tower marketplace, called for approximately 200,000 square feet of retail and restaurant space at Honolulu Harbors Piers 7, 8 and 9 adjacent to the historic Aloha Tower. The analysis included a thorough examination of each segment of the potential customer base and an assessment of the potential expenditure patterns at the center from those identified market segments. The results of the market studies were then utilized to generate sales projections for the center.

THE ROBERTS GROUP: Wood Ranch Development Program, Simi Valley, California

Performed an analysis of retail commercial potentials for a major community shopping center located in the Wood Ranch planned community. The study involved a detailed assessment of competitive retail projects found within the immediate market area surrounding Wood Ranch and a determination of market support generated by Wood Ranch residents. The center is open and operating successfully.

A&B HAWAII, INC./VANGUARD PROPERTIES: Triangle Square Factory Stores, Kahului, Maui, Hawaii

Provided a market analysis of a proposed factory outlet center in Kahului, Maui near the Kahului Airport. The development program called for 110,000 square feet of retail space to be built at one of Maui's most important highway junctions. The analysis included an examination of the potential customer base, consideration of the potential expenditure patterns by the major market segments, and a projection of potential sales at the project. The project has been developed and is operating successfully.

CITY OF VISALIA: Regional Shopping Center Location Studies; Visalia, California

Served the City of Visalia as market and planning consultants in the evaluation of potential locations for new regional shopping center facilities in the City of Visalia. The analysis included an assessment of the market, fiscal, transportation and other economic and social impacts related to the alternative sites under consideration for the new center.

AMFAC/JMB HAWAII, INC.: Kaanapali North Beach Entertainment / Retail Center Feasibility Studies, Kaanapali, West Maui, Hawaii

Provided a detailed assessment of a proposed themed entertainment/retail attraction at North Beach. A number of different retail and entertainment concepts were evaluated for the property, including specialty retail alternatives similar to Whaler's Village and more elaborate commercial recreation complexes featuring entertainment venues similar to Church Street Station in Orlando, Florida. The major finding of the study was that the most profitable use in terms of land utilization and environmental constraints was a major health spa, as this use generated the highest visitor expenditures per unit of land area and required relatively low market penetration of the existing visitor base.

CASTLE & COOKE PROPERTIES, INC.: Iwilei District Market Feasibility Study, Honolulu, Hawaii

Conducted market feasibility studies to provide development guidelines for the redevelopment of the 50-acre Iwilei property. The site is located near downtown Honolulu in an area transitioning from industrial to commercial uses, and was previously occupied by the Dole Cannery. The market analysis concentrated primarily on the market potential for outlet-type retail shopping activities and "bull-pen"-type office space. Major issues raised by the study pertained to the site's relative accessibility for both local residents and visitors.

CASTLE & COOKE PROPERTIES, INC.: Mililani Town Center Market Assessment, Mililani Town, Oahu, Hawaii

Conducted a market analysis of the existing Mililani Town Center, a 166,500 square foot community shopping center located in central Oahu. The primary purposes of the investigation were to first, assess the current market performance of the center given its location, configuration and competitors; second, determine a strategy for expansion of the center to 400,000 square feet of space after giving full consideration to future market positioning, product mix and anchor tenants. Attention also focused on

expanding the range of activities at the center to include a variety of service functions in addition to the retail tenants.

CITY OF LAWDALE: South Bay Galleria Buyout, Redondo Beach, California

Provided a financial evaluation of the ownership interest held by the City of Lawndale in the South Bay Galleria, a regional shopping center that was undergoing renovation by Forest City Development Company. The work performed by the consultant formed the basis for the city's successful sale of its interest in the project to the developer.

CITY OF PASADENA: Lake/Washington Neighborhood Shopping Center, Pasadena, California

Analyzed the development potential for a major new neighborhood shopping center intended to revitalize an older shopping district in Pasadena. The study involved an extensive review of existing businesses in order to assess both the positive and negative impacts of the new facility. The center has been constructed with a supermarket and drug store as the anchor tenants, and has successfully fostered revitalization of the entire district with new commercial development.

MAGUIRE THOMAS PARTNERS: Peter's Landing Specialty Center, Huntington Harbour, California

Provided market and financial consulting services to Peter's Landing, a specialty retail center and marina complex located in the affluent waterfront residential community of Huntington Harbour. Initially, the focus was on evaluating the market potentials for boat slips and retail and office uses. Later, attention was focused on evaluating the financial trade-offs between retention of the marina as a rental program and sale of the berths under a "dockominium" concept.

THE IRVINE COMPANY: Mervyn's Retail Location Study, Various Locations, Orange County

Assisted The Irvine Company (TIC) in evaluating potential alternative locations for Mervyn's department stores on various properties owned by TIC. The study considered both the provision of "blanket" coverage by the chain store throughout Orange County with multiple locations as well as an evaluation of specific sites on TIC lands. Presented results of the study to Mervyn's leadership in Minneapolis.

SAN DIEGO UNIFIED PORT DISTRICT: Embarcadero Master Planning Program Feasibility Studies San Diego, California

Performed market studies leading to the establishment of Seaport Village, a leading specialty retail center of about 200,000 square feet located on the San Diego waterfront. Other market and related investigations have led to development of hotel, marina, convention center and cruise ship terminal facilities along the Embarcadero.

CITY OF IRVINE: Retail Commercial Needs Assessment Study, Irvine, California

Prepared a retail commercial needs assessment for the City of Irvine that considered the long term demand for and supply of retail commercial space in the community. One of the sites investigated ultimately became the Spectrum specialty/entertainment center. The results of the study were somewhat controversial, as the analysis was critical of a number of the existing and proposed retail locations in the residential villages of Irvine with respect to their long term economic viability.

DAVID HOCKER & ASSOCIATES: Shelter Cove Shopping Centers, Palmetto Dunes, Hilton Head, South Carolina

Performed market investigations of the potential for (1) a 200,000 square foot specialty retail shopping center anchored by "downsized" department stores, and a (2) 120,000 square foot convenience retail center. While the convenience center was accepted and completed as originally conceived, there was significant resistance from department stores to the concept of the specialty center in a resort setting because of the low visitation at Hilton Head during the prime Christmas season.

ARROWHEAD REGIONAL DEVELOPMENT COMMISSION: Downtown Duluth Regional Center Evaluation, Duluth, Minnesota

Performed a comprehensive economic and fiscal analysis of alternative locations for a regional shopping center in the Duluth region. While the study clearly showed the advantages to the community of utilizing the downtown as a location for the facility, these potential benefits did not convince potential chain

retailers that there was sufficient market support for the facility or that the center city location could be successfully “retrofitted” with large quantities of retail space.

NANSAY CORPORATION: Market Assessment of Retail Potentials, Westwood Mixed Use Project Westwood, California

Analyzed the market potential for development of a major new retail center in Westwood. The study documented the need for quality retail stores and restaurants in the Westwood area, though the stigma associated with Westwood following several crimes of violence plus the recession of the early 1990s effectively doomed the project. Notwithstanding, in recent years Westwood has been rejuvenated on a piecemeal basis with many of the retail activities proposed in the study.

PRUDENTIAL REALTY/MELVIN SIMON COMPANY: Marina Place Economic/Fiscal Impact Study, Culver City, California

Provided market assessments and economic and fiscal impact analyses of the proposed Marina Place regional shopping center as part of the consultant team that was successful in obtaining approvals for the proposed development on a 30+/- acre site near Marina del Rey. Unfortunately, regional economic conditions coupled with the decline in performance of traditional department stores led to the project's demise; the site was developed instead with a Costco department store.

HAWAII OMORI CORPORATION: Lahaina Cannery Shopping Center Evaluation, Lahaina, Maui

Performed a series of market evaluations for three properties owned by Hawaii Omori Corporation that were located in the Town of Lahaina, Maui. One of the properties serves as the site for the Lahaina Cannery Shopping Center, an existing 180,000 square foot facility. The study examined the possibility of developing a multi-centered retail complex with both specialty and convenience retail nodes designed to serve the full range of resident and tourist retail needs.

MAUNA LANI RESORT, INC.: Specialty Retail Center Market Studies, Mauna Lani, South Kohala, Big Island of Hawaii

Analyzed the market potentials for the development of a specialty retail center at Mauna Lani Resort. The analysis focused on upper-income visitors and their propensities to support specialty retail shops in hotels and at “boutique” centers similar to The Shops at Kapalua. The study identified candidate tenants for the development, provided recommendations regarding store mix, and offered suggestions with respect to the optimum location for the facility within the resort.

ALOHA TOWER DEVELOPMENT CORPORATION: Aloha Tower Development Program, Phases I and II, Honolulu, Hawaii

Prepared developer selection criteria and evaluated business terms of proposals for redevelopment of the Aloha Tower complex, a \$1 billion redevelopment program for the downtown Honolulu waterfront featuring a “festival market” specialty retail center, the precursor to current “entertainment/retail” projects. The first phase of the project, Aloha Tower Marketplace, was completed in 1994. Following the selection of the preferred developer, Enterprise Development Company, provided leasing advisory services and negotiated the business terms of the lease agreement between parties.

STATE OF HAWAII EMPLOYEES RETIREMENT SYSTEM (ERS): Kaahumanu Regional Center Expansion, Kahului, Maui, Hawaii

Provided a market and financial evaluation of the proposed expansion of Kaahumanu Center from 316,600 square feet of gross leasable area (GLA) to 542,600 square feet. The only regional center located on Maui, the property was owned by Maui Land & Pineapple Company, developers of Kapalua Resort. The analysis measured investment returns to the State of Hawaii ERS under a range of future outcomes. Of particular significance were the assessments of potential competitive impacts on the center from Mainland retailers entering the Maui market. The expansion program was successfully completed.

STATE OF HAWAII EMPLOYEES RETIREMENT SYSTEM (ERS): Waikele Shopping Center, Central Oahu, Hawaii

Completed a due diligence review of a proposed power center and an outlet mall which were developed on 40+ / - acres of freeway frontage in the Waikele master-planned community. The services provided to the ERS included a review of major sources of demand for retail goods and services, a survey of existing

and proposed competitive facilities on Oahu, and a detailed examination of the developer's proposed tenant mix and pro forma financial projections. Also compared actual leases with the pro-forma rent schedules to ensure that the project would achieve its target levels of return.

QUEEN LILIUOKALANI TRUST/FIRST HAWAIIAN BANK: Mauka Lands Evaluation, Kailua-Kona, Big Island of Hawaii

Served the Queen Liliuokalani Trust as market and financial advisors for 1,200 acres of land located in Kailua-Kona on the Big Island of Hawaii. Following its re-classification to urban use by the State Land Use Commission, provided assistance to the Trust by performing market studies for the site and reviewing proposals for the first phase of development from shopping center developer candidates. The project has gone forward successfully, and several increments of retail commercial development have been completed.

T & S DEVELOPMENT, INC.: Regional Shopping Center Assessment, Riverside, California

Provided a critique of the market study that supported the expansion of the existing Tyler Mall regional shopping center. Also presented a comparative analysis of the economic benefits resulting from the proposed expansion of Tyler Mall with an alternative program to develop a new regional center at Canyon Springs Road.

DONAHUE/SHRIBER AND THE IRVINE COMPANY: Comparative Analysis of Alternative Sites, City of Irvine, California

Assisted the shopping center developer and the Irvine Company in evaluating alternative locations for the development of Target department stores. Primary focus was on two sites in the City of Irvine – Interstate-5/Myford and Culver/Barranca. The principal basis for comparison was the demographic characteristics of the primary market areas served by the two locations.

HOMART DEVELOPMENT CORP. (SEARS): Proposed Regional Shopping Center, Eugene, Oregon

Evaluated the market potential for a regional shopping center to be located in the Eugene, Oregon metropolitan area. The results of the study suggested that the market was likely too small to absorb the retail space proposed in the Homart project.

THE IRVINE COMPANY: Proposed Regional Shopping Center, Orange County, California

Provided a market analysis of the future potentials for a regional shopping center located on Santiago Canyon Road easterly of the City of Orange. The primary purpose of the study was to guide the master planning for the area and make necessary allocations for lands sufficient to accommodate future commercial space requirements.

AHMANSON COMMERCIAL DEVELOPMENT CORPORATION: Palm Desert Community Shopping Center, Palm Desert, California

Performed market and financial feasibility studies for this recently completed community shopping center located on Highway 111 adjacent to the Palm Desert Town Center regional mall. One purpose of the study was to consider a tenant mix that would be able to effectively compete with the regional mall.

LOS ANGELES COUNTY CHIEF ADMINISTRATIVE OFFICE: Civic Center Mall Retail Analysis Civic Center Mall, Los Angeles

Evaluated the market potential for specialty retail and service commercial uses at a potential retail location on the Civic Center Mall near the Music Center. The purpose of the facility was to provide for the needs of governmental workers and visitors to County Hall of Administration. Consulting services also included lease negotiations with candidate tenants for the project.

APPENDIX B

IMPLAN Economic Impact Analysis Results

B-1 Project Construction Impacts

- a. Employment**
- b. Compensation**
- c. Total Economic Output**

B-2 Project Annual Operation Impacts

- a. Employment**
- b. Compensation**
- c. Total Economic Output**

Appendix B-1(b) Lane Ranch Construction Employment Impacts in the Los Angeles County Economy

IMPLAN Industry Sector	Direct	Indirect	Induced	Total	Percentage	Cum %
34 Construct new nonresidential commercial and h	372.9	0	0	372.9	59.5%	59.5%
369 Architectural- engineering- and related servi	0	26.2	0.4	26.6	4.2%	63.8%
413 Food services and drinking places	0	4.2	16.1	20.3	3.2%	67.0%
319 Wholesale trade businesses	0	11.5	7.3	18.8	3.0%	70.0%
394 Offices of physicians- dentists- and other he	0	0	8.8	8.8	1.4%	71.4%
360 Real estate establishments	0	3.1	5.1	8.2	1.3%	72.8%
382 Employment services	0	4.6	2.8	7.4	1.2%	73.9%
397 Private hospitals	0	0	6.7	6.7	1.1%	75.0%
329 Retail Stores - General merchandise	0	0.5	4.6	5.2	0.8%	75.8%
324 Retail Stores - Food and beverage	0	0.5	4.6	5.1	0.8%	76.7%
426 Private household operations	0	0	4.5	4.5	0.7%	77.4%
398 Nursing and residential care facilities	0	0	4.4	4.4	0.7%	78.1%
354 Monetary authorities and depository credit in	0	2.2	1.9	4.1	0.7%	78.7%
320 Retail Stores - Motor vehicle and parts	0	0.5	3.5	4	0.6%	79.4%
367 Legal services	0	2.3	1.7	4	0.6%	80.0%
335 Transport by truck	0	2.7	1.1	3.9	0.6%	80.6%
414 Automotive repair and maintenance- except car	0	2.1	1.6	3.8	0.6%	81.2%
388 Services to buildings and dwellings	0	2.2	1.5	3.7	0.6%	81.8%
425 Civic- social- professional- and similar orga	0	1.6	1.8	3.3	0.5%	82.4%
356 Securities- commodity contracts- investments-	0	1.2	2	3.2	0.5%	82.9%
368 Accounting- tax preparation- bookkeeping- and	0	1.9	1.2	3.2	0.5%	83.4%
400 Individual and family services	0	0	3.2	3.2	0.5%	83.9%
392 Private junior colleges- colleges- universiti	0	0	3	3.1	0.5%	84.4%
331 Retail Nonstores - Direct and electronic sale	0	0.3	2.5	2.8	0.4%	84.8%
327 Retail Stores - Clothing and clothing accesso	0	0.2	2.4	2.6	0.4%	85.2%
330 Retail Stores - Miscellaneous	0	0.3	2.3	2.5	0.4%	85.6%
381 Management of companies and enterprises	0	1.6	0.9	2.5	0.4%	86.0%
357 Insurance carriers	0	0.4	1.9	2.3	0.4%	86.4%
325 Retail Stores - Health and personal care	0	0.2	1.9	2.2	0.4%	86.8%
396 Medical and diagnostic labs and outpatient an	0	0	2.1	2.1	0.3%	87.1%
411 Hotels and motels- including casino hotels	0	1.1	1	2.1	0.3%	87.4%
323 Retail Stores - Building material and garden	0	0.2	1.8	2	0.3%	87.8%
295 Wood kitchen cabinet and countertop manufactu	0	1.8	0.1	1.9	0.3%	88.1%
399 Child day care services	0	0	1.9	1.9	0.3%	88.4%
374 Management- scientific- and technical consult	0	1	0.7	1.8	0.3%	88.6%
387 Investigation and security services	0	1.3	0.5	1.8	0.3%	88.9%
39 Maint & repair construct of nonresident struc	0	1.1	0.7	1.7	0.3%	89.2%
355 Nondepository credit intermediation and relat	0	0.5	1.2	1.7	0.3%	89.5%
99 Wood windows and doors and millwork manufactu	0	1.6	0	1.6	0.3%	89.7%
351 Telecommunications	0	0.8	0.8	1.6	0.3%	90.0%
386 Business support services	0	1	0.4	1.5	0.2%	90.2%
391 Private elementary and secondary schools	0	0	1.5	1.5	0.2%	90.5%
393 Other private educational services	0	0	1.5	1.5	0.2%	90.7%
395 Home health care services	0	0	1.5	1.5	0.2%	90.9%
417 Commercial and industrial machinery and equip	0	1.3	0.2	1.5	0.2%	91.2%
419 Personal care services	0	0	1.5	1.5	0.2%	91.4%
427 US Postal Service	0	0.6	0.8	1.4	0.2%	91.6%
149 Other plastics product manufacturing	0	1.2	0.2	1.3	0.2%	91.9%
302 Showcase- partition- shelving- and locker man	0	1.2	0	1.3	0.2%	92.1%
401 Community food- housing- and other relief ser	0	0	1.3	1.3	0.2%	92.3%
321 Retail Stores - Furniture and home furnishing	0	0.3	0.9	1.2	0.2%	92.5%
328 Retail Stores - Sporting goods- hobby- book a	0	0.1	1.1	1.2	0.2%	92.7%
365 Commercial and industrial machinery and equip	0	1.2	0.1	1.2	0.2%	92.8%
409 Amusement parks- arcades- and gambling indust	0	0	1.2	1.2	0.2%	93.0%
322 Retail Stores - Electronics and appliances	0	0.2	0.9	1.1	0.2%	93.2%
336 Transit and ground passenger transportation	0	0.4	0.7	1.1	0.2%	93.4%
338 Scenic and sightseeing transportation and sup	0	0.6	0.5	1.1	0.2%	93.6%
339 Couriers and messengers	0	0.6	0.5	1.1	0.2%	93.7%
372 Computer systems design services	0	0.8	0.3	1.1	0.2%	93.9%
407 Fitness and recreational sports centers	0	0.3	0.8	1.1	0.2%	94.1%
358 Insurance agencies- brokerages- and related a	0	0.2	0.8	1	0.2%	94.3%
377 Advertising and related services	0	0.5	0.5	1	0.2%	94.4%
424 Grantmaking- giving- and social advocacy orga	0	0	1	1	0.2%	94.6%
432 Other state and local government enterprises	0	0.2	0.9	1	0.2%	94.7%
431 * Not unique commod (S&LG electricity)	0	0.4	0.5	0.9	0.1%	94.9%
159 Glass product manufacturing made of purchased	0	0.8	0	0.8	0.1%	95.0%
326 Retail Stores - Gasoline stations	0	0.1	0.8	0.8	0.1%	95.1%
340 Warehousing and storage	0	0.4	0.4	0.8	0.1%	95.3%
376 Scientific research and development services	0	0.4	0.4	0.8	0.1%	95.4%
384 Office administrative services	0	0.5	0.3	0.8	0.1%	95.5%
403 Spectator sports companies	0	0.2	0.6	0.8	0.1%	95.6%
421 Dry-cleaning and laundry services	0	0.1	0.7	0.8	0.1%	95.8%
All Other Sectors	0	12.5	14.2	26.5	4.2%	100.0%
Totals	372.9	105.8	147.5	626.2	100%	

Source: IMPLAN Pro ver. 2.0; HR&A Advisors, Inc.

Appendix B-1(c) Lane Ranch Construction Employee Compensation Impacts in the Los Angeles County Economy

IMPLAN Industry Sector	Direct	Indirect	Induced	Total	Percentage	Cum %
34 Construct new nonresidential commercial and h	18,281,354	0	0	18,281,354	60.6%	60.6%
369 Architectural- engineering- and related servi	0	1,733,196	28,869	1,762,065	5.8%	66.4%
319 Wholesale trade businesses	0	701,320	446,547	1,147,867	3.8%	70.2%
394 Offices of physicians- dentists- and other he	0	2	495,577	495,578	1.6%	71.8%
397 Private hospitals	0	2	487,748	487,751	1.6%	73.5%
413 Food services and drinking places	0	92,671	357,830	450,501	1.5%	75.0%
356 Securities- commodity contracts- investments-	0	123,348	209,260	332,608	1.1%	76.1%
381 Management of companies and enterprises	0	187,311	112,666	299,977	1.0%	77.1%
354 Monetary authorities and depository credit in	0	155,243	130,489	285,732	0.9%	78.0%
367 Legal services	0	166,355	118,302	284,657	0.9%	78.9%
320 Retail Stores - Motor vehicle and parts	0	27,332	194,715	222,047	0.7%	79.7%
382 Employment services	0	120,037	74,040	194,077	0.6%	80.3%
357 Insurance carriers	0	30,873	150,404	181,277	0.6%	80.9%
324 Retail Stores - Food and beverage	0	17,129	147,868	164,997	0.5%	81.5%
335 Transport by truck	0	105,247	43,799	149,046	0.5%	82.0%
355 Nondepository credit intermediation and relat	0	43,930	98,107	142,036	0.5%	82.4%
329 Retail Stores - General merchandise	0	14,739	125,139	139,877	0.5%	82.9%
425 Civic- social- professional- and similar orga	0	64,445	72,393	136,838	0.5%	83.3%
351 Telecommunications	0	63,906	64,628	128,535	0.4%	83.8%
368 Accounting- tax preparation- bookkeeping- and	0	78,667	49,510	128,177	0.4%	84.2%
431 * Not unique commod (S&LG electricity)	0	54,125	70,078	124,203	0.4%	84.6%
427 US Postal Service	0	52,718	69,097	121,815	0.4%	85.0%
360 Real estate establishments	0	44,689	74,279	118,968	0.4%	85.4%
392 Private junior colleges- colleges- universiti	0	1,451	111,896	113,346	0.4%	85.8%
374 Management- scientific- and technical consult	0	61,061	43,629	104,690	0.3%	86.1%
414 Automotive repair and maintenance- except car	0	58,396	45,168	103,564	0.3%	86.5%
388 Services to buildings and dwellings	0	57,613	39,627	97,240	0.3%	86.8%
396 Medical and diagnostic labs and outpatient an	0	46	95,678	95,724	0.3%	87.1%
432 Other state and local government enterprises	0	15,909	77,451	93,360	0.3%	87.4%
295 Wood kitchen cabinet and countertop manufact	0	83,440	5,239	88,679	0.3%	87.7%
39 Maint & repair construct of nonresident struc	0	53,309	32,441	85,750	0.3%	88.0%
398 Nursing and residential care facilities	0	0	84,718	84,718	0.3%	88.3%
325 Retail Stores - Health and personal care	0	9,331	75,204	84,535	0.3%	88.6%
338 Scenic and sightseeing transportation and sup	0	45,911	34,521	80,432	0.3%	88.8%
323 Retail Stores - Building material and garden	0	7,264	69,645	76,908	0.3%	89.1%
411 Hotels and motels- including casino hotels	0	38,976	37,178	76,155	0.3%	89.3%
400 Individual and family services	0	0	75,207	75,207	0.2%	89.6%
149 Other plastics product manufacturing	0	61,897	8,969	70,866	0.2%	89.8%
327 Retail Stores - Clothing and clothing accesso	0	6,128	64,602	70,729	0.2%	90.1%
365 Commercial and industrial machinery and equip	0	62,076	4,008	66,084	0.2%	90.3%
358 Insurance agencies- brokerages- and related a	0	12,002	53,205	65,207	0.2%	90.5%
417 Commercial and industrial machinery and equip	0	56,386	8,336	64,721	0.2%	90.7%
117 Asphalt shingle and coating materials manufac	0	62,888	934	63,821	0.2%	90.9%
31 Electric power generation- transmission- and	0	27,358	35,767	63,125	0.2%	91.1%
302 Showcase- partition- shelving- and locker man	0	60,765	1,500	62,265	0.2%	91.3%
384 Office administrative services	0	39,395	22,664	62,059	0.2%	91.5%
322 Retail Stores - Electronics and appliances	0	8,641	52,050	60,690	0.2%	91.7%
99 Wood windows and doors and millwork manufact	0	56,468	1,320	57,788	0.2%	91.9%
115 Petroleum refineries	0	38,525	18,648	57,173	0.2%	92.1%
377 Advertising and related services	0	26,072	30,464	56,536	0.2%	92.3%
372 Computer systems design services	0	40,985	15,498	56,484	0.2%	92.5%
20 Extraction of oil and natural gas	0	35,766	19,433	55,199	0.2%	92.7%
391 Private elementary and secondary schools	0	0	54,384	54,384	0.2%	92.9%
424 Grantmaking- giving- and social advocacy orga	0	10	54,294	54,304	0.2%	93.0%
386 Business support services	0	37,874	16,216	54,090	0.2%	93.2%
330 Retail Stores - Miscellaneous	0	6,084	47,839	53,924	0.2%	93.4%
376 Scientific research and development services	0	25,539	27,714	53,253	0.2%	93.6%
332 Transport by air	0	17,897	32,815	50,712	0.2%	93.7%
395 Home health care services	0	0	47,833	47,833	0.2%	93.9%
346 Motion picture and video industries	0	7,472	37,806	45,278	0.2%	94.0%
321 Retail Stores - Furniture and home furnishing	0	10,118	34,462	44,581	0.1%	94.2%
331 Retail Nonstores - Direct and electronic sale	0	4,324	39,277	43,601	0.1%	94.3%
387 Investigation and security services	0	30,937	12,457	43,394	0.1%	94.5%
340 Warehousing and storage	0	18,847	22,349	41,196	0.1%	94.6%
339 Couriers and messengers	0	21,188	19,551	40,740	0.1%	94.8%
409 Amusement parks- arcades- and gambling indust	0	21	40,258	40,279	0.1%	94.9%
393 Other private educational services	0	758	39,017	39,775	0.1%	95.0%
159 Glass product manufacturing made of purchased	0	36,784	2,045	38,829	0.1%	95.1%
426 Private household operations	0	0	35,922	35,922	0.1%	95.3%
399 Child day care services	0	0	34,928	34,928	0.1%	95.4%
336 Transit and ground passenger transportation	0	11,456	22,889	34,345	0.1%	95.5%
328 Retail Stores - Sporting goods- hobby- book a	0	3,986	29,468	33,454	0.1%	95.6%
All Other Sectors	0	593,306	733,766	1,327,074	4.4%	100.0%
Totals	18,281,354	5,731,945	6,171,635	30,184,934	100%	

Source: IMPLAN Pro ver. 2.0; HR&A Advisors, Inc.

Appendix B-1(a) Lane Ranch Construction Output Impacts in the Los Angeles County Economy

IMPLAN Industry Sector	Direct	Indirect	Induced	Total	Percentage	Cum %
34 Construct new nonresidential commercial and h	55,349,696	0	0	55,349,696	57.9%	57.9%
369 Architectural- engineering- and related servi	0	3,679,923	61,295	3,741,217	3.9%	61.8%
319 Wholesale trade businesses	0	2,050,264	1,305,451	3,355,715	3.5%	65.3%
361 Imputed rental activity for owner-occupied dw	0	0	2,366,467	2,366,467	2.5%	67.8%
115 Petroleum refineries	0	1,358,512	657,606	2,016,117	2.1%	69.9%
360 Real estate establishments	0	629,367	1,046,107	1,675,474	1.8%	71.6%
413 Food services and drinking places	0	265,255	1,024,226	1,289,481	1.3%	73.0%
354 Monetary authorities and depository credit in	0	608,996	511,890	1,120,886	1.2%	74.2%
394 Offices of physicians- dentists- and other he	0	4	1,096,833	1,096,836	1.1%	75.3%
397 Private hospitals	0	4	872,067	872,071	0.9%	76.2%
356 Securities- commodity contracts- investments-	0	295,761	501,759	797,520	0.8%	77.1%
367 Legal services	0	451,933	321,388	773,321	0.8%	77.9%
351 Telecommunications	0	377,307	381,571	758,878	0.8%	78.7%
357 Insurance carriers	0	124,051	604,336	728,387	0.8%	79.4%
381 Management of companies and enterprises	0	390,599	234,941	625,541	0.7%	80.1%
335 Transport by truck	0	414,947	172,681	587,627	0.6%	80.7%
320 Retail Stores - Motor vehicle and parts	0	60,801	433,161	493,962	0.5%	81.2%
365 Commercial and industrial machinery and equip	0	404,678	26,132	430,810	0.5%	81.7%
324 Retail Stores - Food and beverage	0	42,156	363,921	406,076	0.4%	82.1%
355 Nondepository credit intermediation and relat	0	124,992	279,142	404,134	0.4%	82.5%
20 Extraction of oil and natural gas	0	251,019	136,392	387,411	0.4%	82.9%
414 Automotive repair and maintenance- except car	0	207,240	160,294	367,533	0.4%	83.3%
31 Electric power generation- transmission- and	0	156,794	204,987	361,782	0.4%	83.7%
396 Medical and diagnostic labs and outpatient an	0	163	335,625	335,788	0.4%	84.0%
144 Plastics pipe and pipe fitting manufacturing	0	313,672	7,571	321,243	0.3%	84.4%
368 Accounting- tax preparation- bookkeeping- and	0	194,340	122,309	316,650	0.3%	84.7%
329 Retail Stores - General merchandise	0	33,153	281,487	314,640	0.3%	85.0%
99 Wood windows and doors and millwork manufactu	0	294,662	6,888	301,550	0.3%	85.3%
149 Other plastics product manufacturing	0	260,682	37,771	298,453	0.3%	85.6%
295 Wood kitchen cabinet and countertop manufactu	0	267,663	16,806	284,469	0.3%	85.9%
432 Other state and local government enterprises	0	46,998	228,801	275,798	0.3%	86.2%
380 All other miscellaneous professional- scienti	0	187,083	77,620	264,704	0.3%	86.5%
349 Cable and other subscription programming	0	112,161	151,043	263,204	0.3%	86.8%
374 Management- scientific- and technical consult	0	152,238	108,777	261,015	0.3%	87.1%
382 Employment services	0	161,403	99,555	260,959	0.3%	87.3%
117 Asphalt shingle and coating materials manufac	0	246,568	3,660	250,228	0.3%	87.6%
32 Natural gas distribution	0	96,872	147,249	244,121	0.3%	87.8%
388 Services to buildings and dwellings	0	144,203	99,186	243,389	0.3%	88.1%
411 Hotels and motels- including casino hotels	0	122,234	116,596	238,830	0.2%	88.4%
302 Showcase- partition- shelving- and locker man	0	231,729	5,719	237,447	0.2%	88.6%
327 Retail Stores - Clothing and clothing accesso	0	20,290	213,918	234,208	0.2%	88.8%
431 * Not unique commod (S&LG electricity)	0	101,796	131,798	233,594	0.2%	89.1%
331 Retail Nonstores - Direct and electronic sale	0	23,037	209,228	232,265	0.2%	89.3%
392 Private junior colleges- colleges- universiti	0	2,936	226,423	229,359	0.2%	89.6%
425 Civic- social- professional- and similar orga	0	102,810	115,491	218,301	0.2%	89.8%
417 Commercial and industrial machinery and equip	0	189,980	28,085	218,065	0.2%	90.0%
384 Office administrative services	0	134,354	77,294	211,648	0.2%	90.3%
39 Maint & repair construct of nonresident struc	0	126,983	77,274	204,257	0.2%	90.5%
323 Retail Stores - Building material and garden	0	18,810	180,357	199,167	0.2%	90.7%
325 Retail Stores - Health and personal care	0	21,244	171,219	192,463	0.2%	90.9%
159 Glass product manufacturing made of purchased	0	176,474	9,810	186,284	0.2%	91.1%
359 Funds- trusts- and other financial vehicles	0	3,555	175,255	178,810	0.2%	91.3%
332 Transport by air	0	62,682	114,930	177,612	0.2%	91.4%
398 Nursing and residential care facilities	0	0	175,095	175,095	0.2%	91.6%
228 Material handling equipment manufacturing	0	174,124	525	174,649	0.2%	91.8%
427 US Postal Service	0	69,237	90,748	159,985	0.2%	92.0%
377 Advertising and related services	0	71,241	83,240	154,481	0.2%	92.1%
409 Amusement parks- arcades- and gambling indust	0	81	153,555	153,636	0.2%	92.3%
338 Scenic and sightseeing transportation and sup	0	86,549	65,077	151,626	0.2%	92.5%
358 Insurance agencies- brokerages- and related a	0	27,699	122,794	150,494	0.2%	92.6%
330 Retail Stores - Miscellaneous	0	16,602	130,538	147,140	0.2%	92.8%
400 Individual and family services	0	0	143,883	143,883	0.2%	92.9%
422 Other personal services	0	8,288	135,009	143,298	0.1%	93.1%
321 Retail Stores - Furniture and home furnishing	0	31,438	107,073	138,512	0.1%	93.2%
372 Computer systems design services	0	97,858	37,004	134,862	0.1%	93.4%
326 Retail Stores - Gasoline stations	0	10,777	116,097	126,874	0.1%	93.5%
322 Retail Stores - Electronics and appliances	0	17,162	103,384	120,546	0.1%	93.6%
386 Business support services	0	84,036	35,980	120,016	0.1%	93.7%
362 Automotive equipment rental and leasing	0	48,182	71,775	119,957	0.1%	93.9%
376 Scientific research and development services	0	56,731	61,562	118,293	0.1%	94.0%
346 Motion picture and video industries	0	18,746	94,844	113,590	0.1%	94.1%
59 Animal (except poultry) slaughtering- renderi	0	2,797	110,634	113,432	0.1%	94.2%
All Other Sectors	0	2,313,262	3,209,750	5,523,011	5.8%	100.0%
Totals	55,349,696	18,880,188	21,388,959	95,618,843	100%	

Source: IMPLAN Pro ver. 2.0; HR&A Advisors, Inc.

Appendix B-2(b) Lane Ranch Operation Employment Impacts in the Los Angeles County Economy

IMPLAN Industry Sector	Direct	Indirect	Induced	Total	Percentage	Cum %
329 Retail Stores - General merchandise	253.8	0.5	3.4	257.7	31.6%	31.6%
323 Retail Stores - Building material and garden	143.7	0.3	1.3	145.3	17.8%	49.5%
413 Food services and drinking places	129.5	3.9	11.7	145.2	17.8%	67.3%
324 Retail Stores - Food and beverage	52.6	0.2	3.3	56.1	6.9%	74.2%
325 Retail Stores - Health and personal care	44.7	0.1	1.4	46.3	5.7%	79.9%
360 Real estate establishments	0	10.4	3.7	14.1	1.7%	81.6%
319 Wholesale trade businesses	0	4.6	5.3	9.9	1.2%	82.8%
382 Employment services	0	5.9	2	7.9	1.0%	83.8%
394 Offices of physicians- dentists- and other he	0	0	6.4	6.4	0.8%	84.6%
397 Private hospitals	0	0	4.9	4.9	0.6%	85.2%
388 Services to buildings and dwellings	0	3	1.1	4.1	0.5%	85.7%
340 Warehousing and storage	0	3.7	0.3	4	0.5%	86.2%
427 US Postal Service	0	3.1	0.6	3.7	0.5%	86.6%
368 Accounting- tax preparation- bookkeeping- and	0	2.5	0.9	3.3	0.4%	87.0%
426 Private household operations	0	0	3.3	3.3	0.4%	87.4%
398 Nursing and residential care facilities	0	0	3.2	3.2	0.4%	87.8%
377 Advertising and related services	0	2.8	0.4	3.1	0.4%	88.2%
354 Monetary authorities and depository credit in	0	1.7	1.4	3	0.4%	88.6%
381 Management of companies and enterprises	0	2.3	0.7	3	0.4%	88.9%
392 Private junior colleges- colleges- universiti	0	0.6	2.2	2.8	0.3%	89.3%
357 Insurance carriers	0	1.4	1.4	2.7	0.3%	89.6%
320 Retail Stores - Motor vehicle and parts	0	0.1	2.6	2.6	0.3%	89.9%
339 Couriers and messengers	0	2.1	0.4	2.5	0.3%	90.2%
335 Transport by truck	0	1.6	0.8	2.4	0.3%	90.5%
367 Legal services	0	1.1	1.2	2.3	0.3%	90.8%
400 Individual and family services	0	0	2.3	2.3	0.3%	91.1%
414 Automotive repair and maintenance- except car	0	1.1	1.2	2.3	0.3%	91.4%
39 Maint & repair construct of nonresident struc	0	1.8	0.5	2.2	0.3%	91.6%
356 Securities- commodity contracts- investments-	0	0.7	1.5	2.1	0.3%	91.9%
374 Management- scientific- and technical consult	0	1.6	0.5	2.1	0.3%	92.2%
386 Business support services	0	1.7	0.3	2	0.2%	92.4%
387 Investigation and security services	0	1.7	0.4	2	0.2%	92.6%
425 Civic- social- professional- and similar orga	0	0.7	1.3	2	0.2%	92.9%
331 Retail Nonstores - Direct and electronic sale	0	0	1.8	1.9	0.2%	93.1%
327 Retail Stores - Clothing and clothing accesso	0	0	1.7	1.8	0.2%	93.3%
355 Nondepository credit intermediation and relat	0	0.9	0.9	1.8	0.2%	93.6%
330 Retail Stores - Miscellaneous	0	0	1.6	1.7	0.2%	93.8%
393 Other private educational services	0	0.4	1.1	1.5	0.2%	94.0%
396 Medical and diagnostic labs and outpatient an	0	0	1.5	1.5	0.2%	94.1%
399 Child day care services	0	0	1.4	1.4	0.2%	94.3%
351 Telecommunications	0	0.6	0.6	1.2	0.1%	94.5%
358 Insurance agencies- brokerages- and related a	0	0.7	0.6	1.2	0.1%	94.6%
411 Hotels and motels- including casino hotels	0	0.4	0.8	1.2	0.1%	94.8%
431 * Not unique commod (S&LG electricity)	0	0.9	0.4	1.2	0.1%	94.9%
338 Scenic and sightseeing transportation and sup	0	0.8	0.4	1.1	0.1%	95.0%
391 Private elementary and secondary schools	0	0	1.1	1.1	0.1%	95.2%
395 Home health care services	0	0	1.1	1.1	0.1%	95.3%
419 Personal care services	0	0	1.1	1.1	0.1%	95.4%
369 Architectural- engineering- and related servi	0	0.7	0.3	1	0.1%	95.6%
372 Computer systems design services	0	0.8	0.2	1	0.1%	95.7%
401 Community food- housing- and other relief ser	0	0	1	1	0.1%	95.8%
432 Other state and local government enterprises	0	0.4	0.6	1	0.1%	95.9%
384 Office administrative services	0	0.6	0.2	0.9	0.1%	96.0%
389 Other support services	0	0.7	0.2	0.9	0.1%	96.2%
403 Spectator sports companies	0	0.5	0.4	0.9	0.1%	96.3%
409 Amusement parks- arcades- and gambling indust	0	0	0.9	0.9	0.1%	96.4%
421 Dry-cleaning and laundry services	0	0.4	0.5	0.9	0.1%	96.5%
328 Retail Stores - Sporting goods- hobby- book a	0	0	0.8	0.8	0.1%	96.6%
407 Fitness and recreational sports centers	0	0.2	0.6	0.8	0.1%	96.7%
417 Commercial and industrial machinery and equip	0	0.7	0.1	0.8	0.1%	96.8%
113 Printing	0	0.6	0.1	0.7	0.1%	96.9%
321 Retail Stores - Furniture and home furnishing	0	0	0.7	0.7	0.1%	97.0%
322 Retail Stores - Electronics and appliances	0	0	0.7	0.7	0.1%	97.0%
336 Transit and ground passenger transportation	0	0.2	0.5	0.7	0.1%	97.1%
380 All other miscellaneous professional- scienti	0	0.5	0.2	0.7	0.1%	97.2%
424 Grantmaking- giving- and social advocacy orga	0	0	0.7	0.7	0.1%	97.3%
62 Bread and bakery product manufacturing	0	0.3	0.3	0.6	0.1%	97.4%
326 Retail Stores - Gasoline stations	0	0	0.6	0.6	0.1%	97.4%
346 Motion picture and video industries	0	0.3	0.3	0.6	0.1%	97.5%
348 Radio and television broadcasting	0	0.5	0.1	0.6	0.1%	97.6%
349 Cable and other subscription programming	0	0.5	0.1	0.6	0.1%	97.7%
375 Environmental and other technical consulting	0	0.4	0.1	0.6	0.1%	97.7%
All Other Sectors	<u>0.2</u>	<u>8.8</u>	<u>8.9</u>	<u>18.4</u>	<u>2.3%</u>	100.0%
Totals	624.5	83	107.1	814.7	100%	

Source: IMPLAN Pro ver. 2.0; HR&A Advisors, Inc.

Appendix B-2(c) Lane Ranch Operation Employee Compensation Impacts in the Los Angeles County Economy

IMPLAN Industry Sector	Direct	Indirect	Induced	Total	Percentage	Cum %
329 Retail Stores - General merchandise	6,876,507	14,699	90,872	6,982,078	25.5%	25.5%
323 Retail Stores - Building material and garden	5,634,809	9,971	50,574	5,695,354	20.8%	46.4%
413 Food services and drinking places	2,870,960	86,858	259,870	3,217,688	11.8%	58.1%
324 Retail Stores - Food and beverage	1,688,610	6,111	107,380	1,802,101	6.6%	64.7%
325 Retail Stores - Health and personal care	1,737,517	5,496	54,612	1,797,625	6.6%	71.3%
319 Wholesale trade businesses	0	279,759	324,285	604,044	2.2%	73.5%
381 Management of companies and enterprises	0	279,478	81,828	361,306	1.3%	74.8%
394 Offices of physicians- dentists- and other he	0	3	359,943	359,946	1.3%	76.1%
397 Private hospitals	0	3	354,290	354,293	1.3%	77.4%
427 US Postal Service	0	269,277	50,183	319,460	1.2%	78.6%
356 Securities- commodity contracts- investments-	0	69,910	151,981	221,891	0.8%	79.4%
357 Insurance carriers	0	109,116	109,227	218,343	0.8%	80.2%
354 Monetary authorities and depository credit in	0	115,807	94,772	210,579	0.8%	81.0%
382 Employment services	0	154,427	53,775	208,202	0.8%	81.7%
360 Real estate establishments	0	149,632	53,959	203,591	0.7%	82.5%
340 Warehousing and storage	0	183,070	16,230	199,300	0.7%	83.2%
377 Advertising and related services	0	155,281	22,124	177,405	0.6%	83.9%
431 * Not unique commod (S&LG electricity)	0	117,535	50,902	168,437	0.6%	84.5%
367 Legal services	0	78,609	85,924	164,533	0.6%	85.1%
355 Nondepository credit intermediation and relat	0	76,033	71,249	147,282	0.5%	85.6%
320 Retail Stores - Motor vehicle and parts	0	4,316	141,399	145,715	0.5%	86.1%
368 Accounting- tax preparation- bookkeeping- and	0	100,274	35,958	136,232	0.5%	86.6%
374 Management- scientific- and technical consult	0	94,656	31,687	126,344	0.5%	87.1%
39 Maint & repair construct of nonresident struc	0	87,379	23,562	110,941	0.4%	87.5%
388 Services to buildings and dwellings	0	77,373	28,780	106,153	0.4%	87.9%
392 Private junior colleges- colleges- universiti	0	22,929	81,266	104,195	0.4%	88.3%
351 Telecommunications	0	48,092	46,942	95,034	0.3%	88.6%
335 Transport by truck	0	62,724	31,811	94,535	0.3%	89.0%
339 Couriers and messengers	0	78,017	14,199	92,216	0.3%	89.3%
432 Other state and local government enterprises	0	35,360	56,255	91,615	0.3%	89.6%
31 Electric power generation- transmission- and	0	58,938	25,980	84,918	0.3%	90.0%
358 Insurance agencies- brokerages- and related a	0	44,985	38,639	83,624	0.3%	90.3%
338 Scenic and sightseeing transportation and sup	0	56,660	25,071	81,732	0.3%	90.6%
348 Radio and television broadcasting	0	70,855	10,849	81,703	0.3%	90.9%
425 Civic- social- professional- and similar orga	0	28,266	52,577	80,843	0.3%	91.2%
386 Business support services	0	63,117	11,777	74,894	0.3%	91.4%
396 Medical and diagnostic labs and outpatient an	0	71	69,496	69,568	0.3%	91.7%
384 Office administrative services	0	51,227	16,461	67,688	0.2%	91.9%
369 Architectural- engineering- and related servi	0	43,479	20,967	64,447	0.2%	92.2%
414 Automotive repair and maintenance- except car	0	30,135	32,804	62,939	0.2%	92.4%
398 Nursing and residential care facilities	0	0	61,539	61,539	0.2%	92.6%
346 Motion picture and video industries	0	30,923	27,457	58,380	0.2%	92.8%
400 Individual and family services	0	0	54,626	54,626	0.2%	93.0%
349 Cable and other subscription programming	0	42,930	7,431	50,361	0.2%	93.2%
372 Computer systems design services	0	38,798	11,256	50,054	0.2%	93.4%
387 Investigation and security services	0	39,515	9,047	48,562	0.2%	93.6%
327 Retail Stores - Clothing and clothing accesso	0	968	46,913	47,880	0.2%	93.8%
411 Hotels and motels- including casino hotels	0	15,608	27,001	42,609	0.2%	93.9%
393 Other private educational services	0	11,316	28,334	39,650	0.1%	94.1%
391 Private elementary and secondary schools	0	0	39,490	39,490	0.1%	94.2%
424 Grantmaking- giving- and social advocacy orga	0	7	39,436	39,443	0.1%	94.3%
322 Retail Stores - Electronics and appliances	0	1,364	37,798	39,162	0.1%	94.5%
330 Retail Stores - Miscellaneous	0	961	34,740	35,701	0.1%	94.6%
376 Scientific research and development services	0	14,958	20,127	35,085	0.1%	94.7%
417 Commercial and industrial machinery and equip	0	28,714	6,054	34,768	0.1%	94.9%
395 Home health care services	0	0	34,744	34,744	0.1%	95.0%
389 Other support services	0	27,676	6,943	34,619	0.1%	95.1%
390 Waste management and remediation services	0	22,387	11,879	34,266	0.1%	95.2%
113 Printing	0	28,548	5,342	33,890	0.1%	95.4%
332 Transport by air	0	7,863	23,832	31,694	0.1%	95.5%
342 Periodical publishers	0	23,786	6,320	30,106	0.1%	95.6%
409 Amusement parks- arcades- and gambling indust	0	452	29,239	29,691	0.1%	95.7%
331 Retail Nonstores - Direct and electronic sale	0	683	28,522	29,205	0.1%	95.8%
321 Retail Stores - Furniture and home furnishing	0	1,598	25,026	26,624	0.1%	95.9%
426 Private household operations	0	0	26,086	26,086	0.1%	96.0%
399 Child day care services	0	0	25,368	25,368	0.1%	96.1%
375 Environmental and other technical consulting	0	18,554	6,127	24,681	0.1%	96.2%
62 Bread and bakery product manufacturing	0	12,284	12,153	24,437	0.1%	96.3%
403 Spectator sports companies	0	13,800	10,637	24,437	0.1%	96.4%
380 All other miscellaneous professional- scienti	0	18,543	5,756	24,299	0.1%	96.5%
429 Other Federal Government enterprises	20,723	1,108	2,301	24,132	0.1%	96.5%
20 Extraction of oil and natural gas	0	9,827	14,115	23,942	0.1%	96.6%
All Other Sectors	-2	404,542	516,207	920,746	3.4%	100.0%
Totals	18,829,124	4,037,641	4,482,306	27,349,071	100%	

Source: IMPLAN Pro ver. 2.0; HR&A Advisors, Inc.

Appendix B-2(a) Lane Ranch Operation Output Impacts in the Los Angeles County Economy

IMPLAN Industry Sector	Direct	Indirect	Induced	Total	Percentage	Cum %
329 Retail Stores - General merchandise	15,468,012	33,065	204,408	15,705,485	20.7%	20.7%
323 Retail Stores - Building material and garden	14,592,247	25,822	130,969	14,749,038	19.4%	40.1%
413 Food services and drinking places	8,217,627	248,617	743,832	9,210,075	12.1%	52.2%
324 Retail Stores - Food and beverage	4,155,862	15,040	264,275	4,435,177	5.8%	58.0%
325 Retail Stores - Health and personal care	3,955,843	12,513	124,337	4,092,693	5.4%	63.4%
360 Real estate establishments	0	2,107,327	759,926	2,867,253	3.8%	67.2%
319 Wholesale trade businesses	0	817,857	948,027	1,765,884	2.3%	69.5%
361 Imputed rental activity for owner-occupied dw	0	0	1,718,524	1,718,524	2.3%	71.7%
357 Insurance carriers	0	438,437	438,884	877,321	1.2%	72.9%
354 Monetary authorities and depository credit in	0	454,295	371,777	826,072	1.1%	74.0%
394 Offices of physicians- dentists- and other he	0	6	796,643	796,648	1.0%	75.0%
381 Management of companies and enterprises	0	582,796	170,636	753,432	1.0%	76.0%
115 Petroleum refineries	0	267,298	477,623	744,921	1.0%	77.0%
349 Cable and other subscription programming	0	633,716	109,696	743,411	1.0%	78.0%
397 Private hospitals	0	6	633,450	633,456	0.8%	78.8%
351 Telecommunications	0	283,939	277,149	561,088	0.7%	79.6%
356 Securities- commodity contracts- investments-	0	167,628	364,418	532,045	0.7%	80.3%
31 Electric power generation- transmission- and	0	337,786	148,897	486,683	0.6%	80.9%
377 Advertising and related services	0	424,296	60,453	484,750	0.6%	81.5%
367 Legal services	0	213,555	233,428	446,983	0.6%	82.1%
427 US Postal Service	0	353,651	65,907	419,558	0.6%	82.7%
355 Nondepository credit intermediation and relat	0	216,336	202,723	419,059	0.6%	83.2%
335 Transport by truck	0	247,294	125,418	372,711	0.5%	83.7%
340 Warehousing and storage	0	337,520	29,923	367,442	0.5%	84.2%
368 Accounting- tax preparation- bookkeeping- and	0	247,717	88,832	336,549	0.4%	84.6%
320 Retail Stores - Motor vehicle and parts	0	9,601	314,556	324,156	0.4%	85.1%
431 * Not unique commod (S&LG electricity)	0	221,053	95,735	316,787	0.4%	85.5%
374 Management- scientific- and technical consult	0	235,998	79,003	315,001	0.4%	85.9%
382 Employment services	0	207,645	72,306	279,952	0.4%	86.3%
432 Other state and local government enterprises	0	104,459	166,184	270,643	0.4%	86.6%
388 Services to buildings and dwellings	0	193,663	72,035	265,698	0.3%	87.0%
39 Maint & repair construct of nonresident struc	0	208,138	56,124	264,263	0.3%	87.3%
396 Medical and diagnostic labs and outpatient an	0	251	243,783	244,033	0.3%	87.6%
380 All other miscellaneous professional- scienti	0	181,606	56,373	237,978	0.3%	88.0%
384 Office administrative services	0	174,707	56,138	230,845	0.3%	88.3%
414 Automotive repair and maintenance- except car	0	106,945	116,416	223,361	0.3%	88.6%
32 Natural gas distribution	0	107,416	106,955	214,371	0.3%	88.8%
392 Private junior colleges- colleges- universiti	0	46,398	164,443	210,842	0.3%	89.1%
339 Couriers and messengers	0	173,370	31,554	204,924	0.3%	89.4%
348 Radio and television broadcasting	0	171,360	26,237	197,597	0.3%	89.6%
358 Insurance agencies- brokerages- and related a	0	103,822	89,177	192,998	0.3%	89.9%
20 Extraction of oil and natural gas	0	68,970	99,064	168,033	0.2%	90.1%
386 Business support services	0	140,045	26,131	166,176	0.2%	90.3%
366 Lessors of nonfinancial intangible assets	0	138,952	21,946	160,899	0.2%	90.5%
327 Retail Stores - Clothing and clothing accesso	0	3,204	155,344	158,548	0.2%	90.8%
59 Animal (except poultry) slaughtering- renderi	0	77,106	80,361	157,467	0.2%	91.0%
331 Retail Nonstores - Direct and electronic sale	0	3,638	151,939	155,576	0.2%	91.2%
338 Scenic and sightseeing transportation and sup	0	106,813	47,263	154,076	0.2%	91.4%
346 Motion picture and video industries	0	77,577	68,881	146,458	0.2%	91.6%
389 Other support services	0	114,970	28,843	143,812	0.2%	91.7%
369 Architectural- engineering- and related servi	0	92,316	44,518	136,834	0.2%	91.9%
359 Funds- trusts- and other financial vehicles	0	6,488	127,259	133,747	0.2%	92.1%
411 Hotels and motels- including casino hotels	0	48,948	84,677	133,626	0.2%	92.3%
425 Civic- social- professional- and similar orga	0	45,094	83,877	128,971	0.2%	92.5%
398 Nursing and residential care facilities	0	0	127,188	127,188	0.2%	92.6%
372 Computer systems design services	0	92,636	26,875	119,510	0.2%	92.8%
417 Commercial and industrial machinery and equip	0	96,747	20,397	117,144	0.2%	92.9%
409 Amusement parks- arcades- and gambling indust	0	1,724	111,524	113,248	0.1%	93.1%
390 Waste management and remediation services	0	73,891	39,206	113,097	0.1%	93.2%
422 Other personal services	0	13,439	98,052	111,491	0.1%	93.4%
55 Fluid milk and butter manufacturing	0	63,519	47,539	111,058	0.1%	93.5%
332 Transport by air	0	27,538	83,468	111,006	0.1%	93.7%
342 Periodical publishers	0	87,004	23,119	110,123	0.1%	93.8%
400 Individual and family services	0	0	104,508	104,508	0.1%	93.9%
56 Cheese manufacturing	0	79,447	23,827	103,274	0.1%	94.1%
362 Automotive equipment rental and leasing	0	50,692	52,128	102,820	0.1%	94.2%
330 Retail Stores - Miscellaneous	0	2,622	94,795	97,416	0.1%	94.3%
149 Other plastics product manufacturing	0	69,508	27,432	96,940	0.1%	94.5%
393 Other private educational services	0	25,848	64,724	90,571	0.1%	94.6%
62 Bread and bakery product manufacturing	0	44,950	44,473	89,423	0.1%	94.7%
350 Internet publishing and broadcasting	0	75,279	14,112	89,391	0.1%	94.8%
387 Investigation and security services	0	71,278	16,319	87,596	0.1%	94.9%
All Other Sectors	<u>24,861</u>	<u>1,561,421</u>	<u>2,257,276</u>	<u>3,843,568</u>	<u>5.1%</u>	100.0%
Totals	46,414,452	14,074,613	15,534,239	76,023,302	100%	

Source: IMPLAN Pro ver. 2.0; HR&A Advisors, Inc.

APPENDIX C

Explanation of Population, Income and Retail Sales Allocation Factors Used in the Analysis

This Appendix provides additional explanatory detail for the population, income and retail sales projections that are presented in the urban decay analysis presented in Chapter IV, and how potential conflicts among some of the data sources were reconciled.

Population, Households and Incomes

The baseline population forecasts underlying this analysis were prepared by Claritas, Inc., a nationally-recognized provider of demographic information for market analyses. As presented in Table C-1, Claritas provided population, households and baseline income data for two market areas applicable to the Project — (1) the Lancaster Shopping Center Primary Market Area (PMA), defined as the geographic area within a 5.0-Mile Radius from the intersection of 60th street West and West Avenue L in the City of Lancaster; and (2) the Lancaster Shopping Center Secondary Market Area (SMA), represented geographically by a circular ring around the PMA extending from 5.0 miles to 10.0 miles from the intersection of 60th Street West and West Avenue L — as well as for Los Angeles County. Data were prepared for several time periods: the baseline year 2000, per information collected from the U.S. Census; a current estimate for the year 2007, which serves as the base year for this analysis; and a five-year projection for the year 2012, the calendar year which serves as the first full year of operation of the proposed center. These estimates and projections were then evaluated for internal consistency and for comparability with other data sources, including the State of California Department of Finance and the United States Bureau of Economic Analysis (BEA). These data reflect new information since the publication of HR&A's/W&W's previous draft report in March 2008.

Table C-1
**BASELINE DEMOGRAPHIC ESTIMATES AND PROJECTIONS.
 LOS ANGELES COUNTY AND LANCASTER SHOPPING CENTER MARKET AREAS
 SELECTED YEARS, 2000-2013**

<u>Data Category</u>	<u>Primary Market Area 0-5 Mile Radius</u>	<u>Secondary Market Area 5-10 Mile Ring</u>	<u>Los Angeles County</u>
Population			
2000	71,502	123,860	9,519,338
2007	89,188	147,727	10,010,060
2012	102,427	165,744	10,451,889
Number of Households			
2000	22,834	39,951	3,133,774
2007	28,650	46,991	3,256,139
2012	33,065	52,314	3,377,916
Average Per Capita Income			
2000 ¹	\$ 22,121	\$ 15,588	\$ 20,683
2007	\$ 27,331	\$ 17,759	\$ 24,377
2012	\$ 30,982	\$ 19,649	\$ 27,024
Average Household Income			
2000 ¹	\$ 67,146	\$ 47,656	\$ 61,811
2007	\$ 83,156	\$ 55,403	\$ 74,060
2012	\$ 94,269	\$ 61,321	\$ 82,767

¹ Data actually are for calendar year 1999.

Source: Claritas, Inc., 2007 and 2009 estimates and forecasts.

Income

Table C-1 also provides Claritas' estimates of current household and per capita income for the Primary Market Area (PMA), the Secondary Market Area (SMA) and Los Angeles County. While these statistics are indicative to the degree that they reflect differences between the PMA, SMA and the entire Los Angeles County with respect to income levels, the current estimates made by Claritas appear to be quite conservative. For example, Claritas' annual per capita income growth estimates for County residents between 1999 and 2007 is about 2.1 percent, while other estimates and projections for the area made by the United States Bureau of Economic Analysis, Bureau of Labor Statistics and the UCLA Anderson Forecast indicate that per capita personal incomes for the State were growing at a rate above 3.6 percent.³⁰ Given what therefore appear to be unrealistically low estimates by Claritas, further analysis was conducted to arrive at more realistic estimates and projections of current and future income levels for the County, the PMA, and the SMA. These estimates and projections are presented in Table C-2. It should be noted that they reflect higher growth rates estimated by the Bureau of Economic Analysis for the period 1999-2007, then consider the latest forecast made by the UCLA

³⁰ For example, the authoritative UCLA Forecast estimates the annual rate of per capita income growth in the State at about 5.5 percent for the period 1999-2007.

Economic Forecast for the State of California that indicate lower rates of projected per-capital personal income growth for the years 2008 through 2011 as noted below:

Table C-1A.
PER-CAPITA INCOME GROWTH
STATE OF CALIFORNIA, 2008-2012

<u>Year</u>	<u>Percent Change in Per Capita Personal Income</u>
2008	3.4%
2009	-1.3%
2010	1.9%
2011	5.5%
<u>2012 and thereafter</u>	4.5% ^{1/}

^{1/} Based on average growth over period 2001-2008.

Source: UCLA Anderson Forecast, March 2009; W&W, Inc.

For the final forecast year of 2012 that is used in the urban decay analysis, personal income growth is projected to average 4.5 percent annually, a level that is consistent with the rate of income growth projected by the UCLA Anderson Forecast for 2011.

There are two basic measures of per capita personal income that are commonly used in retail market analysis: (1) Per Capita Personal Income as measured by the U.S. Bureau of Economic Analysis (BEA); and (2) Per Capita Personal Income as reported in the United States Census, which is also the basis for the Claritas projections. The BEA definition is a broader definition of per capita personal income that includes both money receipts and changes in assets. It is generally a higher figure for a given population than the per capita amount reported by the U.S. Census, which reports a more limited concept of “money” income that is estimated by census respondents. As noted in Table C-2, the U.S. Census figure for Los Angeles County per capita income was equivalent to 75.85 percent of the BEA County per capita income measure estimate in 1999, and comparative data for other time periods suggest that the ratio between these two per capita income measures has stayed fairly consistent over time.

In the preparation of per capita personal income estimates and projections for the PMA and the SMA, the baseline estimates made by Claritas were adjusted upward to reflect both: (1) the recent BEA estimates of per capita income for State of California residents; (2) the recent BEA estimates of per capita income for County of Los Angeles residents; and (3) the relative differentials in per capita incomes historically found in the PMA and the SMA *vis a vis* Los Angeles County as measured by Claritas. The results of these adjustments are presented in Table C-2 in the form of per capita income estimates and projections in years 2007, 2008, 2009, 2010, 2011 and 2012 for the PMA, SMA and Los Angeles County residents.

Table C-2
COMPARISON OF PER CAPITA INCOMES FOR STATE OF CALIFORNIA, LOS ANGELES COUNTY AND LANCASTER MARKET AREAS
1999-2012

	1999	2000	2006	Estimated 2007	Estimated 2008	Projected 2009	Projected 2010	Projected 2011	Projected 2012
State of California									
Per Capita Personal Income, BEA Definition	\$29,828	\$32,462	\$ 39,626	\$ 41,580	\$ 42,536	\$ 41,558	\$ 42,490	\$ 44,402	\$ 46,400
County of Los Angeles									
Per Capita Personal Income, BEA Definition	\$27,270	\$29,232	\$37,362	\$39,501	\$40,410	\$39,480	\$40,365	\$42,182	\$44,080
County as Percent of State	93.2%	90.0%	94.3%	95.0%	95.0%	95.0%	95.0%	95.0%	95.0%
Money Income as Percent of Personal Income	75.85%			76.0%	76.0%	76.0%	76.0%	76.0%	76.0%
County of Los Angeles Per Capita Personal Income, Census Definition (Claritas):	\$ 20,683			\$ 24,377		\$ 25,399			\$ 27,024
Adjusted County of Los Angeles Per Capita Personal Income, Census Definition	\$ 20,683			\$ 30,021		\$ 30,005			\$ 33,501
Lancaster Market Areas									
1. Primary Market Area (0-5.0 Mile Radius)									
Per Capita Personal Income, Census Definition (Claritas)	\$ 22,121			\$ 27,331		\$ 28,815			\$ 30,982
Adjusted Per Capita Personal Income, Census Definition	\$ 22,121			\$ 33,659		\$ 34,040			\$ 38,408
Per Capita Personal Income: BEA Definition	\$ 29,166			\$ 44,288	\$ 45,306	\$ 44,264	\$ 44,663	\$ 46,672	\$ 48,773
2. Secondary Market Area (5.0-10.0 Mile Ring)									
Per Capita Personal Income, Census Definition (Claritas)	\$ 15,588			\$ 17,759		\$ 18,348			\$ 19,469
Adjusted Per Capita Personal Income, Census Definition	\$ 15,588			\$ 21,871		\$ 21,675			\$ 24,135
Per Capita Personal Income: BEA Definition	\$ 20,552			\$ 28,777	\$ 29,439	\$ 28,762	\$ 29,021	\$ 30,327	\$ 31,691

Source: US Bureau of Economic Analysis; U S Census; State of California: Department of Finance & Employment Development Department; Bureau of Labor Statistics; Los Angeles County Economic Development Commission; Claritas, Inc.; W & W, Inc.; HR&A Advisors, Inc.

Retail Sales Demand

Future retail sales demand has been calculated by determining the percent of personal income that has historically been expended for retail sales in the State of California and applying it to existing and future population and income levels in the Lancaster market areas. This percentage has been calculated by comparing total retail sales as measured by the U.S. Census of Retail Trade in census years 1997 and 2002 with the BEA measure of California Personal Income for these two corresponding calendar years as noted in Table C-3.

Table C-3
RETAIL SALES AS PERCENT OF INCOME, US BEA AND US CENSUS
STATE OF CALIFORNIA

Year	Total Personal Income (<u>'000s</u>)	Total Retail Sales ^{1/} (<u>'000s</u>)	Retail Sales as % of Personal Income (BEA)	Retail Sales as % of Personal Income (Census)
1997	\$ 860,544,880	\$ 285,356,629	33.2%	45.4%
2002	\$ 1,147,868,177	\$ 383,296,602	33.4%	45.7%
		Average	33.3%	45.5%

^{1/} Excludes e-sales and vending machines; adds Eating and Drinking facility sales.

Source: U S Bureau of Economic Analysis (BEA); U S Census; W & W, Inc.; HR&A Advisors, Inc.

Allocations of retail sales to individual retail categories and store types have been developed following the retail store classification system utilized by the California State Board of Equalization. As shown in Table C-4, annual retail sales measured by the State and by the U.S. Census correspond reasonably well after adjustments are made in the State's taxable sales

statistics that convert them to total retail sales. The adjustments that convert the State's taxable retail sales to total retail sales are based on a review of data for 1997 and 2002, years when comparative data are available from both the U.S. Census and the Board of Equalization.

After the adjustments to retail sales by store category are made at the state level for 2002 and 2007 (see Tables C-5 and C-6), they are then refined to reflect local tastes and preferences by utilizing the retail sales distributions to various store categories per the percentage distributions that are found in Los Angeles County.

Table C-4
 COMPARATIVE ANALYSIS, STATE BOARD OF EQUALIZATION AND U S CENSUS OF RETAIL TRADE
 RETAIL SALES BY MAJOR RETAIL CATEGORY, STATE OF CALIFORNIA
 2002
 (in Thousands of Current Dollars)

<u>Retail Store Category</u>	<u>2002 State</u>	<u>Adjust. Factor</u>	<u>State Adjusted</u>	<u>2002 Census</u>
Apparel Stores	14,029,200		14,029,200	
Clothing, Accessories, Jewelry, Luggage				22,661,146
General Merchandise Stores				
Department Stores & Other General Merchandise	42,741,257		42,741,257	46,696,215
Drug Stores	5,745,634	3.069	17,635,808	17,635,808
Total, General Merchandise	<u>48,486,891</u>		<u>60,377,065</u>	<u>64,332,023</u>
Food Store Group				
Food Stores	18,951,412		58,106,188	57,964,493
Liquor Stores	2,137,065		2,137,065	2,278,760
Total, Food & Beverage	<u>21,088,477</u>	2.857	<u>60,243,253</u>	<u>60,243,253</u>
Eating & Drinking Group				
Limited Service Restaurants	17,202,160		17,202,160	
Full Service Eating and Drinking Places	20,877,670		20,877,670	
Total, Eating & Drinking	<u>38,079,830</u>		<u>38,079,830</u>	
Household Furnishings Group	13,983,287		13,983,287	
Furniture & Home Furnishings				11,605,138
Electronics & Appliances				13,186,464
Building Materials and Farm Supplies				
Building Materials and Supplies	25,816,009		25,816,009	24,515,132
Farm and Garden Supply	2,135,472		2,135,472	
Lawn/Garden Supplies, including Farm Eqpt				2,265,209
Total, Building Materials and Garden Supplies	<u>27,951,481</u>		<u>27,951,481</u>	<u>27,687,248</u>
Automotive Group				
Auto Dealers/Parts	63,821,146	1.421	90,664,859	90,664,859
Service Stations	23,928,351		23,928,351	23,421,136
Total, Automotive Group	<u>87,749,497</u>		<u>114,593,210</u>	<u>114,085,995</u>
Specialty: State Board of Equalization				
Specialty Group(Calif definition)	43,539,120		43,539,120	
Used Merchandise	520,999		520,999	
Subtotal, Specialty, State Board of Equalization	<u>44,060,119</u>		<u>44,060,119</u>	
All Other: State of California/US Census				
Farm Implement Dealers	2,258,243		2,258,243	
Fuel and Ice Dealers	277,357		277,357	906,907
Mobile Home, RV, Motorcycle, Boat, Plane Dealers	3,647,924	1.441	5,256,663	5,256,663
Subtotal, All Other, State Board of Equalization	<u>6,183,524</u>		<u>7,792,263</u>	
All Other: US Census				
Health & Personal Care(less Drug Stores/Pharmacies)				3,108,465
Sporting Goods, Hobby, Books, Music, et al				9,789,031
Misc. Retail: Florists, Office Supplies, Used Merch., Pets, Art, et al				10,786,260
Total, Other	<u>50,243,643</u>		<u>51,852,382</u>	<u>28,940,419</u>
Grand Total, Store Groups Noted Above	301,612,306		381,109,708	342,741,686
Less: Eating & Drinking			<u>(38,079,830)</u>	
Total Retail Store Sales, Selected Categories			343,029,878	342,741,686
<u>State as Percent of Census</u>			100.08%	

Source: State of California, State Board of Equalization; U S Census of Retail Trade; HR&A, Inc.; W & W, Inc.

Table C-5
DISTRIBUTION OF RETAIL SALES BY MAJOR RETAIL CATEGORY
STATE OF CALIFORNIA
2002

(in Thousands of Current Dollars)

<u>Retail Store Category</u>	<u>State Taxable Retail Sales</u>	<u>Percent Distribution</u>	<u>Adjustment Factor</u>	<u>State Adjusted Retail Sales</u>	<u>Percent Distribution</u>
Apparel Stores	14,029,200	4.65%		14,029,200	3.68%
General Merchandise Group					
Department Stores	42,741,257	14.17%		42,741,257	11.21%
Drug Stores	5,745,634	1.90%	3.0694	17,635,808	4.63%
Total, General Merchandise Group	48,486,891	16.08%		60,377,065	15.84%
Food Store Group					
Food Stores	18,951,412	6.28%		58,106,188	15.25%
Liquor Stores	2,137,065	0.71%		2,137,065	0.56%
Total, Food & Beverage Group	21,088,477	6.99%	2.8567	60,243,253	15.81%
Eating & Drinking Group					
Limited Service Restaurants	17,202,160	5.70%		17,202,160	4.51%
Full Service Eating and Drinking Places	20,877,670	6.92%		20,877,670	5.48%
Total, Eating & Drinking	38,079,830	12.63%		38,079,830	9.99%
Household Furnishings Group	13,983,287	4.64%		13,983,287	3.67%
Building Materials Group	27,951,481	9.27%		27,951,481	7.33%
Automotive Group					
Auto Dealers/Parts	63,821,146	21.16%	1.4206	90,664,859	23.79%
Service Stations	23,928,351	7.93%		23,928,351	6.28%
Total, Automotive Group	87,749,497	29.09%		114,593,210	30.07%
Specialty Group, incl Used Merchandise	44,060,119	14.61%		44,060,119	11.56%
All Other					
Mobile Home, RV, Motorcycle, Boat, Plane Dealers	3,647,924	1.21%	1.4410	5,256,663	1.38%
Fuel and Ice Dealers, Farm Implement Dealers	2,535,600	0.84%		2,535,600	0.67%
Total, All Other	6,183,524	2.05%		7,792,263	2.04%
Total Retail Store Sales	301,612,306	100.00%		381,109,708	100.00%

Source: State of California, State Board of Equalization; U S Census of Retail Trade; HR&A Advisors, Inc.; W & W, Inc.

Table C-6
DISTRIBUTION OF RETAIL SALES BY MAJOR RETAIL CATEGORY
STATE OF CALIFORNIA
2007
(in Thousands of Current Dollars)

<u>Retail Store Category</u>	<u>State Taxable Retail Sales</u>	<u>Percent Distribution</u>	<u>Adjustment Factor</u>	<u>State Adjusted Retail Sales</u>	<u>Percent Distribution</u>
Apparel Stores	20,855,890	5.39%		20,855,890	4.39%
General Merchandise Group					
Department Stores	53,428,213	13.80%		53,428,213	11.24%
Drug Stores	6,469,137	1.67%	3.0694	19,856,548	4.18%
Total, General Merchandise Group	59,897,350	15.48%		73,284,761	15.42%
Food Store Group					
Food Stores	22,461,059	5.80%		69,320,828	14.59%
Liquor Stores	2,777,271	0.72%		2,777,271	0.58%
Total, Food & Beverage Group	25,238,330	6.52%	2.8567	72,098,099	15.17%
Eating & Drinking Group					
Limited Service Restaurants	23,471,875	6.06%		23,471,875	4.94%
Full Service Eating and Drinking Places	28,186,700	7.28%		28,186,700	5.93%
Total, Eating & Drinking Group	51,658,575	13.35%		51,658,575	10.87%
Household Furnishings Group	16,720,852	4.32%		16,720,852	3.52%
Building Materials Group	35,622,021	9.20%		35,622,021	7.50%
Automotive Group					
Auto Dealers/Parts	65,735,209	16.98%	1.4206	93,383,993	19.65%
Service Stations	47,084,940	12.17%		47,084,940	9.91%
Total, Automotive Group	112,820,149	29.15%		140,468,933	29.56%
Specialty Group, incl Used Merchandise	58,659,621	15.16%		58,659,621	12.35%
All Other					
Mobile Home, RV, Motorcycle, Boat, Plane Dealers	5,044,769	1.30%	1.4410	5,256,663	1.11%
Fuel and Ice Dealers, Farm Implement Dealers	507,545	0.13%		507,545	0.11%
Total, All Other	5,552,314	1.43%		5,764,208	1.21%
Total Retail Store Sales	387,025,102	100.00%		475,132,960	100.00%

Source: State of California, State Board of Equalization; U S Census of Retail Trade; HR&A Advisors, Inc.; W & W, Inc.

The final retail sales distributions to individual retail store categories utilized in this analysis for the PMA, and SMA are derived from data presented in Tables C-7, C-8 and C-9. The data in these tables show the distribution of taxable and total retail sales in Los Angeles County for 2002 and 2007. In this regard, it should be noted that 2007 is the most recent calendar year for which annual taxable sales data are available as of the date this updated report was prepared.

Table C-7
COMPARATIVE ANALYSIS AND RECONCILIATION, STATE BOARD OF EQUALIZATION AND U S CENSUS OF RETAIL TRADE
RETAIL SALES BY MAJOR RETAIL CATEGORY, LOS ANGELES COUNTY
2002
(in Thousands of Current Dollars)

<u>Retail Store Category</u>	2002 <u>County</u>	Adjust. <u>Factor</u>	County <u>Adjusted</u>	2002 <u>Census</u>
Apparel Stores	4,036,630		4,036,630	
Clothing, Accessories, Jewelry, Luggage				6,887,625
General Merchandise Group				
Department Stores & Other General Merchandise	9,704,153		9,704,153	10,659,149
Drug Stores	1,492,554	3.2573	4,861,770	4,861,770
Total, General Merchandise Group	11,196,707		14,565,923	15,520,919
Food Store Group				
Food Stores	4,235,299		14,850,438	14,821,554
Liquor Stores	544,140		544,140	573,024
Total, Food Store Group	4,779,439	3.2210	15,394,578	15,394,578
Eating & Drinking Group				
Restaurants, no Alcohol	5,364,930		5,364,930	
Resaurants with Alcohol	5,176,950		5,176,950	
Total, Eating & Drinking Group	10,541,880		10,541,880	
Household Furnishings Group	3,378,316		3,378,316	
Furniture & Home Furnishings				3,003,224
Electronics & Appliances				3,542,758
Building Materials and Garden Supplies				
Building Materials and Supplies	5,528,888		5,528,888	4,991,218
Farm and Garden Supplies	213,137		213,137	
Lawn/Garden Supplies				240,146
Total, Building Materials and Garden Supplies Group	5,742,025		5,742,025	5,231,364
Automotive Group				
Auto Dealers/Parts	15,869,231	1.5989	25,373,957	25,373,957
Service Stations	6,404,120		6,404,120	5,396,775
Total, Automotive Group	22,273,351		31,778,077	30,770,732
Specialty Group: State Board of Equalization				
Specialty Stores	11,638,907		11,638,907	
Used Merchandise	100,733		100,733	
Subtotal, Specialty Group	11,739,640		11,739,640	
All Other: State Board of Equalization				
Farm Implement Dealers	250,116		250,116	
Fuel and Ice Dealers	48,785		48,785	40,529
Mobile Home, RV, Motorcycle, Boat, Plane Dealers	561,088	1.2856	721,339	721,339
Subtotal, All Other (State Board of Equalization)	859,989		1,020,240	
All Other: US Census				
Health & Personal Care(less Drug Stores/Pharmacies)				917,972
Sporting Goods, Hobby, Books, Music, et al				2,581,307
Misc. Retail: Florists, Office Supplies, Used Merch., Pets, Art, et al				2,731,895
Total, All Other	12,599,629		12,759,880	6,993,042
Grand Total, Store Groups Noted Above	74,547,977		98,197,309	87,344,242
Less: Eating & Drinking Group			(10,541,880)	
Total Retail Store Sales			87,655,429	87,344,242
<u>County as Percent of Census</u>			100.36%	

Source: State of California, State Board of Equalization; U S Census of Retail Trade; HR&A Advisors, Inc.; W & W, Inc.

Table C-8
DISTRIBUTION OF RETAIL SALES BY MAJOR RETAIL CATEGORY
COUNTY OF LOS ANGELES
2002
(in Thousands of Current Dollars)

<u>Retail Store Category</u>	<u>County Taxable</u>	<u>Percent of Total</u>	<u>Adjustment Factor</u>	<u>County Estimated Total</u>	<u>Percent of Total</u>
Apparel Stores	4,036,630	5.41%		4,036,630	4.11%
General Merchandise Group					
Department Stores	9,704,153	13.02%		9,704,153	9.88%
Drug Stores	1,492,554	2.00%	3.2573	4,861,770	4.95%
Total, General Merchandise Group	11,196,707	15.02%		14,565,923	14.83%
Food Store Group					
Food Stores	4,235,299	5.68%		14,850,438	15.12%
Liquor Stores	544,140	0.73%		544,140	0.55%
Total, Food & Beverage Group	4,779,439	6.41%	3.2210	15,394,578	15.68%
Eating & Drinking Group					
Limited-Service Restaurants	5,364,930	7.20%		5,364,930	5.46%
Full-Service Eating and Drinking Places	5,176,950	6.94%		5,176,950	5.27%
Total, Eating & Drinking	10,541,880	14.14%		10,541,880	10.74%
Household Furnishings Group	3,378,316	4.53%		3,378,316	3.44%
Building Materials Group	5,742,025	7.70%		5,742,025	5.85%
Automotive Group					
Auto Dealers/Parts	15,869,231	21.29%	1.5989	25,373,957	25.84%
Service Stations	6,404,120	8.59%		6,404,120	6.52%
Total, Automotive Group	22,273,351	29.88%		31,778,077	32.36%
Specialty Group, incl Used Merchandise	11,739,640	15.75%		11,739,640	11.96%
All Other					
Mobile Home, RV, Motorcycle, Boat, Plane Dealer:	561,088	0.75%	1.2856	721,339	0.73%
Fuel and Ice Dealers, Farm Implement Dealers	298,901	0.40%		298,901	0.30%
Total, All Other	859,989	1.15%		1,020,240	1.04%
Total Retail Store Sales	74,547,977	100.00%		98,197,309	100.00%

Source: State of California, State Board of Equalization; U S Census of Retail Trade; HR&A Advisors, Inc.; W & W, Inc.

Table C-9
DISTRIBUTION OF TAXABLE AND TOTAL RETAIL SALES BY MAJOR RETAIL CATEGORY
COUNTY OF LOS ANGELES
2007

(in Thousands of Current Dollars)

<u>Retail Store Category</u>	<u>County Taxable</u>	<u>Adjustment Factor</u>	<u>County Estimated Total</u>	<u>Percent of Total</u>
Apparel Stores	5,829,390		5,829,390	4.60%
General Merchandise Group				
Department Stores	12,122,397		12,122,397	9.56%
Drug Stores	1,703,141	3.2573	5,547,725	4.38%
Total, General Merchandise Group	<u>13,825,538</u>		<u>17,670,122</u>	13.94%
Food Store Group				
Food Stores	4,911,939		17,335,344	13.67%
Liquor Stores	681,667		681,667	0.54%
Total, Food & Beverage Group	<u>5,593,606</u>	3.2210	<u>18,017,011</u>	14.21%
Eating & Drinking Group				
Limited Service Restaurants	7,274,685		7,274,685	5.74%
Full-Service Eating and Drinking Places	7,198,514		7,198,514	5.68%
Total, Eating & Drinking	<u>14,473,199</u>		<u>14,473,199</u>	11.42%
Household Furnishings Group	4,287,090		4,287,090	3.38%
Building Materials Group	7,494,731		7,494,731	5.91%
Automotive Group				
Auto Dealers/Parts	16,463,589	1.5989	26,324,300	20.76%
Service Stations	12,230,800		12,230,800	9.65%
Total, Automotive Group	<u>28,694,389</u>		<u>38,555,100</u>	30.41%
Specialty Group, incl Used Merchandise	14,845,935		14,845,935	11.71%
All Other				
Mobile Home, RV, Motorcycle, Boat, Plane Dealer:	692,629	1.2856	5,256,663	4.15%
Fuel and Ice Dealers, Farm Implement Dealers	359,204		359,204	0.28%
Total, All Other	<u>1,051,833</u>		<u>5,615,867</u>	4.43%
Total Retail Store Sales	96,095,711		126,788,445	100.00%

Source: State of California, State Board of Equalization; U S Census of Retail Trade; HR&A Advisors, inc.; W & W, Inc.

Appendix C

Traffic Calculations for Responses to Comments

Attachment 2

ICU/Delay Summary Existing + Ambient + Project Conditions

No.	Intersection	Peak Hour	Dir*	2008 Existing		Existing + Ambient		Exist + Amb + Proj		Growth	% Impact	Significant Impact?	Exist+Amb+ Project with Mitigation			Significant Impact?	
				ICU/ DELAY	LOS	ICU/ DELAY	LOS	ICU/ DELAY	LOS				ICU/ DELAY	LOS	ICU/ DELAY		LOS
1.	60th Street West & Avenue J	AM	WB	117.7	F	268.8	F	866.8	F	+	598.0	222.5%	YES	0.569	A	N/A	NO
			EB	27.6	D	34.3	D	43.8	E	+	9.5	27.7%	YES				NO
		PM	WB	24.4	C	31.1	D	240.9	F	+	209.8	674.6%	YES	0.468	A	N/A	NO
			EB	17.2	C	19.8	C	43.6	E	+	23.8	120.2%	YES				NO
		Sat	WB	13.0	B	13.7	B	65.0	F	+	51.3	374.5%	YES	0.479	A	N/A	NO
			EB	11.8	B	12.2	B	15.3	C	+	3.1	25.4%	NO				NO
2.	60th Street West & Avenue J-8	AM	WB	14.3	B	14.9	B	22.1	C	+	7.2	48.3%	NO	N/A			
			EB	13.4	B	14.5	B	22.3	C	+	7.8	53.8%	NO				
		PM	WB	14.3	B	15.4	B	30.7	D	+	15.3	99.4%	NO	N/A			
			EB	11.8	B	12.3	B	20.0	C	+	7.7	62.6%	NO				
		Sat	WB	12.0	B	12.4	B	23.5	C	+	11.1	89.5%	NO	N/A			
			EB	10.1	B	10.3	B	15.3	C	+	5.0	48.5%	NO				
3.	60th Street West & Avenue K	AM	-	0.528	A	0.562	A	0.635	B	+	0.073	13.0%	NO	N/A			
		PM	-	0.457	A	0.486	A	0.675	B	+	0.189	38.9%	NO	N/A			
		Sat	-	0.376	A	0.399	A	0.659	B	+	0.260	65.2%	NO	N/A			
4.	60th Street West & Avenue K-8	AM	WB	12.9	B	13.4	B	18.2	C	+	4.8	35.8%	NO	N/A			
			EB	14.9	B	16.4	C	31.0	D	+	14.6	89.0%	NO				
		PM	WB	10.6	B	10.8	B	16.6	C	+	5.8	53.7%	NO	N/A			
			EB	11.8	B	12.3	B	27.3	D	+	15.0	122.0%	NO				
		Sat	WB	10.3	B	10.5	B	18.6	C	+	8.1	77.1%	NO	N/A			
			EB	10.7	B	11.0	B	27.5	D	+	16.5	150.0%	NO				
5.	60th Street West & Avenue K-12	AM	WB	15.3	C	16.4	C	34.5	D	+	18.1	110.4%	NO	0.398	A	N/A	NO
			EB	N/A		N/A		131.0	F		-	-	YES				NO
		PM	WB	12.8	B	13.4	B	32.6	D	+	19.2	143.3%	NO	0.521	A	N/A	NO
			EB	N/A		N/A	B	502.4	F		-	-	YES				NO
		Sat	WB	11.5	B	11.9	B	90.3	F	+	78.4	658.8%	YES	0.617	B	N/A	NO
			EB	N/A		N/A		1894.0	F		-	-	YES				NO

ICU/Delay Summary (continued)
Existing + Ambient + Project Conditions

No.	Intersection	Peak Hour	Dir*	2008 Existing		Existing + Ambient		Exist + Amb + Proj		Growth	% Impact	Significant Impact?	Exist+Amb+ Project with Mitigation			Significant Impact?
				ICU/ DELAY	LOS	ICU/ DELAY	LOS	ICU/ DELAY	LOS				ICU/ DELAY	LOS	ICU/ DELAY	
6.	60th Street West & Avenue L	AM	-	0.624	B	0.665	B	0.741	C +	0.076	11.4%	NO	N/A			
		PM	-	0.533	A	0.569	A	0.823	D +	0.254	44.6%	NO	N/A			
		Sat	-	0.453	A	0.481	A	0.861	D +	0.380	79.0%	NO	N/A			
7.	60th Street West & Avenue L-4	AM	EB	15.7	C	17.4	C	33.3	D +	15.9	91.4%	NO	N/A			
		PM	EB	13.7	B	14.5	B	32.7	D +	18.2	125.5%	NO	N/A			
		Sat	EB	11.5	B	12.0	B	25.1	D +	13.1	109.2%	NO	N/A			
8.	60th Street West & Avenue L-8	AM	-	0.544	A	0.581	A	0.649	B +	0.068	11.7%	NO	N/A			
		PM	-	0.404	A	0.427	A	0.569	A +	0.142	33.3%	NO	N/A			
		Sat	-	0.339	A	0.358	A	0.556	A +	0.198	55.3%	NO	N/A			
9.	60th Street West & Avenue M/Columbia	AM	-	17.80	C	21.85	C	37.02	E +	15.17	69.4%	YES	0.521	A	N/A	NO
		PM	-	19.76	C	25.69	D	89.40	F +	63.71	248.0%	YES	0.479	A	N/A	NO
		Sat	-	13.21	B	14.65	B	63.65	F +	49.00	334.5%	YES	0.457	A	N/A	NO
10.	70th Street West & Avenue L	AM	-	11.12	B	11.86	B	12.79	B +	0.93	7.8%	NO	0.510	A	N/A	NO
		PM	-	8.68	A	8.84	A	9.65	A +	0.81	9.2%	NO	0.394	A	N/A	NO
		Sat	-	8.47	A	8.60	A	9.72	A +	1.12	13.0%	NO	0.396	A	N/A	NO
11.	65th Street West & Avenue L	AM	NB	13.2	B	14.2	B	18.4	C +	4.2	29.6%	NO	N/A			
		PM	NB	9.2	A	9.3	A	10.2	B +	0.9	9.7%	NO	N/A			
		Sat	NB	9.1	A	9.2	A	10.5	B +	1.3	14.1%	NO	N/A			
12.	57th Street West & Avenue L	AM	NB	14.1	B	15.0	B	16.2	C +	1.2	8.0%	NO	N/A			
		PM	NB	11.2	B	11.6	B	13.6	B +	2.0	17.2%	NO	N/A			
		Sat	NB	12.2	B	12.6	B	16.5	C +	3.9	31.0%	NO	N/A			
13.	55th Street West & Avenue L	AM	NB	17.8	C	20.4	C	29.4	D +	9.0	44.1%	NO	N/A			
		PM	NB	12.1	B	12.8	B	15.7	C +	2.9	22.7%	NO	N/A			
		Sat	NB	11.4	B	12.0	B	15.0	C +	3.0	25.0%	NO	N/A			

ICU/Delay Summary (continued)
Existing + Ambient + Project Conditions

<u>No.</u>	<u>Intersection</u>	<u>Peak Hour</u>	<u>Dir*</u>	<u>2008 Existing</u>		<u>Existing + Ambient</u>		<u>Exist + Amb + Proj</u>		<u>Growth</u>	<u>% Impact</u>	<u>Significant Impact?</u>	<u>Exist+Amb+ Project with Mitigation</u>			<u>Significant Impact?</u>
				<u>ICU/ DELAY</u>	<u>LOS</u>	<u>ICU/ DELAY</u>	<u>LOS</u>	<u>ICU/ DELAY</u>	<u>LOS</u>				<u>ICU/ DELAY</u>	<u>LOS</u>	<u>IMPACT</u>	
14.	50th Street West & Avenue L	AM	-	0.726	C	0.776	C	0.815	D	+	0.039	5.0%	NO	N/A		
		PM	-	0.758	C	0.810	D	0.887	D	+	0.077	9.5%	NO	N/A		
		Sat	-	0.662	B	0.708	C	0.804	D	+	0.096	13.6%	NO	N/A		
15.	45th Street West & Avenue L	AM	-	0.507	A	0.539	A	0.567	A	+	0.028	5.2%	NO	N/A		
		PM	-	0.740	C	0.791	C	0.883	D	+	0.092	11.6%	NO	N/A		
		Sat	-	0.719	C	0.768	C	0.860	D	+	0.092	12.0%	NO	N/A		
16.	40th Street West & Avenue L	AM	-	0.716	C	0.766	C	0.786	C	+	0.020	2.6%	NO	N/A		
		PM	-	0.721	C	0.772	C	0.819	D	+	0.047	6.1%	NO	N/A		
		Sat	-	0.624	B	0.667	B	0.727	C	+	0.060	9.0%	NO	N/A		

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No Data = No information available as there is a system failure in the direction of analysis

N/A = NOT APPLICABLE

ICU = Intersection Capacity Utilization which is the intersections volume/capacity

Delay = Calculated using Highway Capacity Method which is seconds of delay per vehicle

ICU/Delay Summary (continued)
Existing + Ambient + Project Conditions

No.	Intersection	Peak Hour	Dir*	Exist + Amb + Rel Proj			Future With Project				%	Significant Impact?	Future with Project with Mitigation			Significant Impact?
				ICU/	LOS	Growth	ICU/	LOS	IMPACT	ICU/			LOS	IMPACT		
			DELAY			DELAY			Impact		DELAY			Impact?		
1.	60th Street West & Avenue J	AM	WB	NO DATA	-	-	NO DATA	-	-	-	Yes	0.670	B	N/A	No	
			EB	76.6	F +	42.3	112.8	F +	36.2	47.3%	Yes					
		PM	WB	419.1	F +	388.0	783.1	F +	364.0	86.9%	Yes	0.669	B	N/A	No	
			EB	65.9	F +	46.1	194.7	F +	128.8	195.4%	Yes					
		Sat	WB	1586.0	F +	1572.3	NO DATA	-	-	-	Yes	0.758	C	N/A	No	
			EB	38.1	E +	25.9	111.8	F +	73.7	193.4%	Yes					
2.	60th Street West & Avenue J-8	AM	WB	31.3	D +	16.4	43.2	E +	11.9	38.0%	Yes	0.742	C	N/A	No	
			EB	100.6	F +	86.1	173.2	F +	72.6	72.2%	YES					
		PM	WB	60.5	F +	45.1	163.4	F +	102.9	170.1%	YES	0.678	B	N/A	No	
			EB	103.8	F +	91.5	318.3	F +	214.5	206.6%	Yes					
		Sat	WB	43.1	F +	30.7	118.4	F +	75.3	174.7%	YES	0.777	C	N/A	No	
			EB	94.8	F +	84.5	391.2	F +	296.4	312.7%	YES					
3.	60th Street West & Avenue K	AM	-	D +	0.258	0.909	E +	0.089	10.9%	Yes	0.772	C	-0.048	No		
		PM	-	F +	0.524	1.201	F +	0.191	18.9%	Yes	0.906	E	-0.104	No		
		Sat	-	F +	0.652	1.312	F +	0.261	24.8%	Yes	0.929	E	-0.122	No		
4.	60th Street West & Avenue K-8	AM	WB	529.3	F +	515.9	1082.0	F +	552.7	104.4%	Yes	0.562	A		No	
			EB	485.7	F +	469.3	NO DATA	-	-	-	Yes					
		PM	WB	NO DATA	-	-	NO DATA	-	-	-	Yes	0.616	B		No	
			EB	809.7	F +	797.4	NO DATA	-	-	-	Yes					
		Sat	WB	NO DATA	-	-	NO DATA	-	-	-	Yes	0.681	B		No	
			EB	NO DATA	-	-	NO DATA	-	-	Yes						
5.	60th Street West & Avenue K-12	AM	WB	60.9	F +	44.5	106.6	F +	45.7	75.0%	Yes	0.501	A		No	
			EB	60.4	F	-	678.9	F +	618.5	1024.0%	Yes					
		PM	WB	105.3	F +	91.9	786.6	F +	681.3	647.0%	Yes	0.674	B		No	
			EB	85.0	F	-	927.4	F +	842.4	991.1%	Yes					
		Sat	WB	162.4	F +	150.5	3733.0	F +	3570.6	2198.6%	Yes	0.830	D		No	
			EB	95.0	F	-	33856.0	- +	-	-	Yes					

ICU/Delay Summary (continued)
Existing + Ambient +Project Conditions

No.	Intersection	Peak Hour	Dir*	Exist + Amb + Rel Proj			Future With Project				%	Significant Impact?	Future with Project with Mitigation			Significant Impact?
				ICU/ DELAY	LOS	Growth	ICU/ DELAY	LOS	IMPACT	ICU/ DELAY			LOS	IMPACT		
6.	60th Street West & Avenue L	AM	-	0.948	E +	0.283	0.963	E +	0.015	1.6%	No	0.751	C	-0.197	No	
		PM	-	1.206	F +	0.637	1.224	F +	0.018	1.5%	No	0.889	D	-0.317	No	
		Sat	-	1.230	F +	0.749	1.336	F +	0.106	8.6%	Yes	0.980	E	-0.250	No	
7.	60th Street West & Avenue L-4	AM	EB	65.8	F +	48.4	131.4	F +	65.6	99.7%	Yes	0.563	A		No	
		PM	EB	84.5	F +	70.0	312.6	F +	228.1	269.9%	Yes	0.519	A		No	
		Sat	EB	58.4	F +	46.4	276.6	F +	218.2	373.6%	Yes	0.519	A		No	
8.	60th Street West & Avenue L-8	AM	-	0.707	C +	0.126	0.775	C +	0.068	9.6%	No	0.572	A	-0.135	No	
		PM	-	0.721	C +	0.294	0.862	D +	0.141	19.6%	NO	0.553	A	-0.168	No	
		Sat	-	0.712	C +	0.354	0.909	E +	0.197	27.7%	Yes	0.573	A	-0.139	No	
9.	60th Street West & Avenue M/Columbia	AM	-	113.53	F +	91.68	160.65	F	47.12	41.5%	Yes	0.633	B		No	
		PM	-	255.10	F +	229.41	369.62	F +	114.52	44.9%	Yes	0.713	C		No	
		Sat	-	242.63	F +	227.98	387.19	F +	144.56	59.6%	Yes	0.717	C		No	
10.	70th Street West & Avenue L	AM	-	38.95	E +	27.09	47.05	E +	8.10	20.8%	Yes	0.728	C		No	
		PM	-	21.56	C +	12.72	30.37	D +	8.81	40.9%	No	0.721	C		No	
		Sat	-	20.74	C +	12.14	33.68	D +	12.94	62.4%	No	0.742	C		No	
11.	65th Street West & Avenue L	AM	NB	26.3	D +	12.1	31.2	D +	4.9	18.6%	No	N/A			No	
		PM	NB	12.1	B +	2.8	13.4	B +	1.3	10.7%	No	N/A				
		Sat	NB	12.6	B +	3.4	14.7	B +	2.1	16.7%	No	N/A				
12.	57th Street West & Avenue L	AM	NB	17.3	C +	2.3	18.3	C +	1.0	5.8%	No	N/A				
		PM	NB	17.0	C +	5.4	19.8	C +	2.8	16.5%	No	N/A				
		Sat	NB	17.9	C +	5.3	22.0	C +	4.1	22.9%	No	N/A				
13.	55th Street West & Avenue L	AM	NB	59.6	F +	39.2	132.4	F +	72.8	122.1%	Yes	0.520	A		No	
		PM	NB	38.4	E +	25.6	75.3	F +	36.9	96.1%	Yes	0.548	A		No	
		Sat	NB	33.9	D +	21.9	75.0	F +	41.1	121.2%	Yes	0.550	A		No	

ICU/Delay Summary (continued)
Existing + Ambient + Project Conditions

<u>No.</u>	<u>Intersection</u>	<u>Peak Hour</u>	<u>Dir*</u>	<u>Exist + Amb + Rel Proj</u>			<u>Future With Project</u>				<u>% Impact</u>	<u>Significant Impact?</u>	<u>Future with Project with Mitigation</u>			<u>Significant Impact?</u>
				<u>ICU/ DELAY</u>	<u>LOS</u>	<u>Growth</u>	<u>ICU/ DELAY</u>	<u>LOS</u>	<u>IMPACT</u>	<u>ICU/ DELAY</u>			<u>LOS</u>	<u>IMPACT</u>		
14.	50th Street West & Avenue L	AM	-	0.950	E +	0.174	0.990	E +	0.040	4.2%	Yes	0.697	B	-0.253	No	
		PM	-	1.060	F +	0.250	1.137	F +	0.077	7.3%	Yes	0.842	D	-0.218	No	
		Sat	-	0.981	E +	0.273	1.077	F +	0.096	9.8%	Yes	0.769	C	-0.212	No	
15.	45th Street West & Avenue L	AM	-	0.700	C +	0.161	0.727	C +	0.027	3.9%	No	0.458	A	-0.242	No	
		PM	-	0.986	E +	0.195	1.053	F +	0.067	6.8%	Yes	0.699	B	-0.287	No	
		Sat	-	0.981	E +	0.213	1.146	F +	0.165	16.8%	Yes	0.631	B	-0.350	No	
16.	40th Street West & Avenue L	AM	-	0.932	E +	0.166	0.952	E +	0.020	2.1%	Yes	0.688	B	-0.244	No	
		PM	-	1.029	F +	0.257	1.077	F +	0.048	4.7%	Yes	0.866	D	-0.163	No	
		Sat	-	0.928	E +	0.261	0.988	E +	0.060	6.5%	Yes	0.723	C	-0.205	No	

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