



City of
SANTA CLARITA

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August 25, 2009

U.S. Army Corps of Engineers
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California Department of Fish and Game
Newhall Ranch EIS/EIR Project Comments
c/o Dennis Bedford
4949 Viewridge Avenue
San Diego, CA 92123
Email: newhallranch@dfg.ca.gov

(Comments forwarded via email)

Subject: DEIR Comments for Newhall Ranch Resource Management Development Plan
and Spineflower Conservation Plan

The City of Santa Clarita appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report and Draft Environmental Impact Statement for the above referenced Resource Management Development Plan and the Spineflower Conservation Plan (RMDP/SCP) for the Newhall Ranch project area. The City of Santa Clarita has reviewed the environmental analysis as prepared by the lead agencies (USACE and CDFG) and their consultants and found it to be comprehensive and an adequate basis upon which to evaluate environmental impacts prior to approving the RMDP/SCP. The comments which follow relate specifically to the Alternatives Analysis section of the document.

The DEIR/DEIS identifies seven project alternatives, consisting of:

1. The "No Project" alternative;
2. The "Proposed Project" alternative (the County approved project);
3. Elimination of Potrero Bridge, reduce project buildable area and expand acreage of all Spineflower Preserves;
4. Elimination of Potrero Bridge, reduce project buildable area and conversion of the unbuilt portion of the Valencia Commerce Center into additional open space and Spineflower Preserve;

5. Maintain three bridge crossings, reduce project buildable area, and expand acreage of all Spineflower Preserves and conversion of unbuilt portion of the Valencia Commerce Center into additional open space and Spineflower Preserve;
6. Widen channel configuration to protect tributaries, eliminate Commerce Center Drive Bridge, and reduce project buildable area and conversion of the unbuilt portion of the Valencia Commerce Center into additional open space and Spineflower Preserve; and
7. Construct all bank protection outside of 100 year floodplain, eliminate Potrero and Commerce Center bridges, and reduce project buildable area and conversion of the unbuilt portion of the Valencia Commerce Center into additional open space and Spineflower Preserve.

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The table that follows shows that with the exception of Alternative 1 ("No Project") and Alternative 2 ("County Approved Project") each of the successive Alternatives results in progressively larger open space acreages and/or progressively larger Spineflower preserves. More importantly, each of these successive Alternatives (Alternatives 3-7) result in reduced development area and most particularly, reduced Commercial, Mixed-Use and Business Park acreage.

**EIS/EIR Table 4.14-8
Comparison of Project Alternatives**

Alternative	Specific Plan Components				
	Residential Units	Industrial Park (MSF)	Commercial (MSF)	Public Facilities	Open Space (Acres)
Alternative 1	0	0	0	0	0
Alternative 2	20,885	0	5.55	643	10,200
Alternative 3	20,433	0	5.48	636	10,463
Alternative 4	20,721	0	5.48	644	10,451
Alternative 5	20,196	0	5.42	641	10,538
Alternative 6	19,787	0	5.33	605	10,756
Alternative 7	16,471	0	3.76	549	11,446

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SCP Planning Area Components (includes Specific Plan, VCC, and Entrada)					
Alternative 1	0	0	0	0	0
Alternative 2	22,610	2.542	9.4	697	10,473
Alternative 3	21,558	2.542	9.33	686	10,783
Alternative 4	21,846	0	5.93	680	10,948
Alternative 5	21,155	0	5.87	672	11,041
Alternative 6	20,212	0	5.78	633	11,286
Alternative 7	17,323	0	3.82	589	11,970

MSF= million square feet (rounded to nearest 1/100th)

To be clear from the outset, the City of Santa Clarita acknowledges that the Newhall Ranch project, as approved by the Los Angeles County Board of Supervisors provides for a Jobs/Housing balance ratio of nearly one job per household. While that 0.82:1 jobs/housing ratio exceeds that which provided by many large scale projects, it continues to fall short of meeting actual employment needs of its residents. The draft One Valley One Vision (OVOV) joint City /County General Plan cites a jobs/housing ratio goal for the Santa Clarita Valley ranging from a low of 1.3:1, up to 2:1, depending on the method of calculation. We believe that any project Alternatives which resulted in further reductions to the jobs/housing ratio (reduced employment) for the project would not be in the best interests of the community and would be contrary to the intended policies and objectives of OVOV.

In accordance with CEQA, project alternatives need not be considered which fail to achieve the basic goals or purpose of the project. One of the primary goals of the project is to address the current jobs/housing imbalance in the Santa Clarita Valley by providing a "local and regional jobs/housing balance" with both residential land uses and commercial, mixed-use and business park uses which will provide local employment opportunities for new residents within the project and existing residents outside of the project area. The Newhall Ranch Specific Plan, as approved by the Los Angeles County Board of Supervisors on May 27, 2003, has commercial/mixed-use/business park land uses to generate approximately 10,129 new jobs for the Santa Clarita Valley. The remaining unbuilt portion of the Valencia Commerce Center (3.4 million square feet) would generate roughly 6,262 additional jobs, along with the proposed commercial portion of the pending Entrada project (450,000 square feet) which will generate roughly 829 new jobs. This results in a cumulative project employment total of roughly 17,311 new jobs--- based on Alternative 2 (the County-approved Newhall Ranch projects, and buildout of the County-approved Valencia Commerce Center project, along with the proposed Entrada project). However, in addition to Alternative 1 (the no build alternative), each of the Alternatives 3 through 7 would reduce the future employment generated by the cumulative project, losing as much as 41% of the total project employment, as shown below:

Project Alternatives			
Employment Created – Employment Lost			
Alternative	Commercial / Industrial / Business Park (MSF)	Jobs Created (Approximate)	Change From County BOS Approved Project* (Jobs Lost)
1	0	0	-17311
2	9.4	17311	0
3	9.33	17182	-129
4	5.93	10921	-6390
5	5.87	10810	-6501
6	5.78	10645	-6666
7	3.82	7035	-10276

(*Note: This accounting assumes that the employment center planned within the pending Entrada project is ultimately approved by the County Board of Supervisors.)

The County Board of Supervisors, when certifying the FEIR for the Newhall Ranch Specific Plan in 2003, made a Statement of Overriding Considerations relative to various residual impacts that could not be mitigated to a level of insignificance. Primary among these Overriding Considerations was the generation of employment which would provide a community-wide benefit in addressing the jobs/housing imbalance in the Santa Clarita Valley. Each of the employment reducing alternatives noted in the table above would alter the project in such a way as to substantially reduce the project benefits which were the basis for the Overriding Consideration that the Board relied upon when certifying the project FEIR in 2003. Implementing any of the Alternatives which substantially alter the basis for the project approval and the FEIR certification would be contrary to the purpose and intention of the project developer, as well as negate the stated purpose and intent of the Board of Supervisors in approving the project and certifying the environmental document. These employment-reducing Alternatives would also negate the letters and testimony of hundreds of residents and community associations that either supported the project or did not oppose the project due, in part, to the employment producing benefits of the project.

The traffic studies and the individual traffic models which were prepared for each of the six development alternatives were detailed and comprehensive. Each of the models accurately accounted for the traffic generation factors of each of the land uses presented in each alternative and appears to have made reasonable assumptions for trip assignment and trip distribution. However, it is our contention that there are potential cumulative traffic, air quality and greenhouse gas emissions (GHG) impacts associated with NOT providing sufficient jobs within the community, and that these impacts can be difficult for even the best traffic models to quantify. Each of the project Alternatives except for Alternative 2 (County Approved Project Alternative) result in additional work trips on the freeway for those commuting to the San Fernando Valley or Los Angeles, or additional work trips across the Santa Clarita Valley for those driving to work across the Valley.

The traffic analysis for each Alternative has adequately accounted for all of the cumulative (non-project at buildout) "background" trips, plus all of the trips generated by land uses within each project alternative. However, the models do not appear to include what we would expect to be an increase in freeway and surface street work trips resulting from the reduction in local employment under each of the reduced employment Alternatives. Even though it may be difficult to precisely quantify these work trips which might be reduced as a result of the new employment created by the project, their effect on the reduced employment Alternatives should be acknowledged and estimated in order to fully compare the relative traffic, air quality and greenhouse gas emissions (GHG) impacts of each of the project Alternatives.

Furthermore, Alternatives 3, 4, 6 and 7 each involve removal of one or more bridge crossings from the planned circulation within Newhall Ranch. While the traffic models for each of the proposed alternatives did take into account the altered circulation networks when estimating traffic volumes, other aspects of altering the circulation network appear to be unaddressed in the Alternatives analysis. Removal of one or more bridges from planned circulation network will make the project circulation far more circuitous and indirect. Any potential impact on response times for emergency services should be evaluated. In addition, the effect of these vehicular circulation changes on future transit routes and schedules and on non-motorized transportation (i.e. bikeways and paseos) should be evaluated and specifically addressed in the alternatives analysis.

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Every lead agency which approves development projects must strive to achieve a balance between several factors which are all important: preservation of environmental resources; sustainability; creating real "community" for ourselves and our children; providing adequate housing and employment; developing and maintaining passive and active recreation facilities; and preserving open spaces. Alternative 2 (County Approved Specific Plan) appears to provide a reasonable balance of all of these factors, without the reduction in future employment which would further compromise the jobs/housing balance in the Santa Clarita Valley.

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Thank you for your consideration of these comments.

Sincerely,



Paul D. Brotzman
Community Development Director

PDB:DK:lep

S: CD/Current/IRP/IRP Files/ Newhall Ranch/RMDP SCP EIR Comments

cc: Kenneth R. Puskamp, City Manager
Lisa Webber, AICP, Planning Manager
Sharon Sorensen, Senior Planner
David Koontz, Associate Planner
Paul Novak, Planning Deputy, 5th District

From: "David Koontz" <DKOONTZ@santa-clarita.com>
To: NEWHALLRANCH@dfg.ca.gov; Aaron.O.Allen@usace.army.mil
Date: Wed, Aug 26, 2009 2:58 PM
Subject: Newhall Ranch RMDP SCP EIS EIR Comments

Please contact me if you have any questions.

Thanks.

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From: "David Koontz" <DKOONTZ@santa-clarita.com>
To: Aaron.O.Allen@usace.army.mil; NEWHALLRANCH@dfg.ca.gov
Date: Tue, Aug 25, 2009 4:59 PM
Subject: Newhall Ranch RMDP SCP EIR/EIS Comments

Dennis and Aaron,

The City is currently finalizing its review comments on the Newhall Ranch RMDP and SCP EIR/EIS. Our comments are brief and straightforward, however our review chain may not complete its sign off until tomorrow morning. Would you kindly accept our review comments tomorrow morning?

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021. Letter from the City of Santa Clarita, dated August 25, 2009

Response 1

This comment is an introduction to comments that follow. The comment does not address the content of the Draft EIS/EIR, therefore, no additional response is provided.

Response 2

This comment summarizes information contained in the Draft EIS/EIR regarding the development characteristics of the proposed Project and the alternatives to the Project evaluated by the environmental document. The comment does not raise an environmental issue or address the adequacy of the impact evaluation provided by the Draft EIS/EIR, therefore, no additional response is provided. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 3

This comment summarizes information contained in the Draft EIS/EIR regarding the development characteristics of the proposed Project and the alternatives to the Project evaluated by the environmental document. The comment does not address the adequacy of the environmental impact analysis provided by the Draft EIS/EIR, therefore, no additional response is provided. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 4

This comment provides background information regarding ongoing local and regional planning efforts related to establishing a jobs/housing ratio goal for the Santa Clarita Valley. In addition, the comment expresses the opinion of the City of Santa Clarita that alternatives to the proposed Project (Alternative 2) that result in reductions in the jobs/housing ratio included in the Specific Plan approved by the Board of Supervisors would be contrary to recent jobs/housing balance planning efforts of the One Valley One Vision (OVOV) program, which is currently under development by the City of Santa Clarita and Los Angeles County. Los Angeles County has released a Draft EIR for the OVOV program and, as of late 2009, is preparing a Final EIR. The City of Santa Clarita will prepare and release its own EIR for the OVOV program.

Draft EIS/EIR **Subsection 4.14.1.1**, Relationship of Proposed Project to Newhall Ranch Specific Plan Program EIR, explains that the Newhall Ranch Revised Draft EIR (March, 1999) addressed and considered land use issues of the Specific Plan, and that Specific Plan Appendix 7.2, General Plan Consistency, found that the Specific Plan was consistent with applicable policies of the Los Angeles County General Plan and Santa Clarita Valley Area Plan. The Board of Supervisors of Los Angeles County also confirmed this consistency finding when it approved the Newhall Ranch Revised Additional Analysis (May, 2003).

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. The comment does not address the adequacy of the environmental impact analysis provided by the Draft EIS/EIR.

Response 5

The Draft EIS/EIR, **Subsection 2.1.3.1**, indicated that the following were the overall objectives of the proposed Project under the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA):

- "To practicably and feasibly achieve the basic objectives of the Specific Plan, thereby helping to meet the regional demand for housing and jobs. Specifically, the RMDP component of the proposed Project would address the long-term management of sensitive biological resources in conjunction with the construction and maintenance of RMDP infrastructure needed to implement the approved Specific Plan in a manner that complies with federal and state environmental protection requirements; and
- "To develop and implement a practicable and feasible SCP that would permanently protect and manage a system of preserves designed to maximize the long-term persistence of the spineflower within the applicant's land holdings containing known spineflower populations, and to authorize the take of spineflower in areas located outside of designated preserves."

Additionally, Draft EIS/EIR **Subsections 2.1.3.2** and **2.1.3.3** listed additional objectives of the Resource Management and Development Plan (RMDP) and Spineflower Conservation Plan (SCP), respectively. To clarify, implementation of the RMDP and SCP is the proposed Project evaluated in the EIS/EIR, which, in turn, would facilitate development of the previously approved Newhall Ranch Specific Plan. In accordance with CEQA, the Draft EIS/EIR analyzed a reasonable range of alternatives to the proposed Project "which would feasibly attain most of the basic project objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines § 15126.6, subd. (a).) Alternatives that may meet project objectives to a lesser degree than the proposed Project must still be considered in the EIS/EIR if they avoid or substantially lessen any of the significant effects of the project. The NEPA purpose and need/CEQA objectives (**Subsection 2.1.3.1**) were revised in response to comments and based on additional independent review by the lead agencies (U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG)). Please see revised **Section 2.0**, Project Description of the Final EIS/EIR.

The Corps and CDFG appreciate the comment regarding the project objectives, and it will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 6

This comment provides information related to the number of jobs that the City of Santa Clarita anticipates would be provided by the previously approved Newhall Ranch Specific Plan and Valencia Commerce Center (VCC) projects, and the proposed Entrada project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. The comment does not raise an environmental issue or address the adequacy of the impact evaluation provided by the EIS/EIR, therefore, no additional response is provided.

Response 7

This comment provides information related to the number of jobs that the City of Santa Clarita anticipates would be provided by the proposed Project under each of the alternatives evaluated by the Draft EIS/EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. The comment does not raise an environmental issue or address the adequacy of the impact evaluation provided by the EIS/EIR, therefore, no additional response is provided.

Response 8

As described by the Draft EIS/EIR, the implementation of Alternatives 4, 5, 6, or 7 would result in the establishment of a spineflower preserve in the VCC planning area. Although the establishment of a spineflower preserve in the VCC project area would be consistent with the objectives of the SCP, a spineflower preserve in this area would preclude build-out of the previously approved VCC project. The Draft EIS/EIR indicated that the inability to build-out the previously approved VCC project would eliminate approximately 3.4 million square feet (msf) of commercial and industrial park area from the Project. As summarized in Draft EIS/EIR **Subsection 4.14.9**, Significant Unavoidable Impacts, the inability to complete construction of the VCC under Alternatives 4, 5, 6, and 7 would eliminate job opportunities and result in a significant and unavoidable conflict with Specific Plan Land Use Planning Objective No. 2, which is intended to promote Specific Plan development adjacent to existing and planned employment centers, and to assist in satisfying a jobs/housing balance in the Santa Clarita Valley. The Corps and CDFG decision makers will consider these issues when making a final decision on the proposed Project. This comment will be included as part of the record and made available to the decision makers prior to that final decision.

Response 9

The Corps and CDFG acknowledge your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 10

The comment states that each of the Project alternatives except for Alternative 2 would result in additional work trips on the freeways for people commuting to the San Fernando Valley or Los Angeles or across the Santa Clarita Valley, as a result of the decreased jobs provided by the non-residential development that would be enabled if one of the Alternatives to the proposed Project is approved. While reducing the amount of jobs available in the community increases the need to commute across or outside of the Santa Clarita Valley, each of the Project alternatives was independently modeled using the Santa Clarita Valley Consolidated Traffic Model (SCVCTM). The traffic model takes the jobs/housing balance into account in the distribution step of the modeling process. Therefore, the EIS/EIR's analysis of traffic impacts for the Project alternatives was sufficient. With respect to air quality and greenhouse gas (GHG) impacts, the analyses of these two impact categories are derivative in part of the traffic impacts analysis and, as such, the air quality and GHG impacts analysis also considered the jobs/housing balance in assessing impacts. Please see Final EIS/EIR, revised **Section 8.0**, Global Climate Change, and revised **Section 4.7**, Air Quality. Please also see **Topical Response 10: Vehicle Trip Distribution Methodology**, for a detailed explanation regarding the SCVCTM trip distribution methodology. The

comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 11

The comment states that the traffic modeling does not appear to include what the comment "would expect to be an increase in freeway and surface street work trips resulting from the reduction in local employment under each of the reduced employment Alternatives." This comment is addressed in **Response 10**, above. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 12

The comment states that potential impacts to response times for emergency services, future transit routes and schedules, and non-motorized transportation should be evaluated for each Project alternative. The analysis of circulation-related impacts provided in Draft EIS/EIR, **Section 4.8**, Traffic, indicated that significant traffic-related impacts would not result from the elimination of a proposed bridge under Alternatives 3, 4, and 6, or the elimination of two proposed bridges under Alternative 7. With respect to emergency services response times, the Draft EIS/EIR, **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, addressed impacts relating to emergency services response times and determined that adequate on-site circulation would be provided to facilitate emergency response from existing off-site and proposed on-site fire stations. However, the analysis also concluded that if two of the three proposed bridges were eliminated as under Alternative 7, emergency access across the Santa Clara River would be impaired in the event of a wildland fire. Consequently, Alternative 7 was determined to result in a significant and unavoidable hazard-related impact. Please also see revised **Sections 4.8** and **4.17** of the Final EIS/EIR.

With respect to transit and non-motorized travel, the removal of one or more bridges potentially could affect such travel. However, for each of the Project alternatives in which a bridge(s) is removed, the land use plan also was modified to eliminate or reduce the amount of land use in the areas served by the bridge, and other roadways are provided to allow for adequate circulation. Additionally, the local Santa Clarita Valley and Ventura County bus systems are anticipated to expand service as additional development occurs over the long-term, and these plans will be evaluated on a regular basis with routes added and or modified as appropriate. (Draft EIS/EIR, p. 4.8-25.). As such, none of the Project alternatives would result in significant impacts relative to transit or non-motorized travel. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 13

The comment expresses the opinion of the commentor in support of the proposed Project (Alternative 2). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. The comment does not address the adequacy of the environmental impact analysis provided by the Draft EIS/EIR, therefore, no additional response is provided.