

## 3.1.7 Individuals

### IE1. Letter from Thomas Barron, dated February 13, 2017

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#### Comment No. IE1-1:

I have already testified at several hearings OPPOSING Newhall Ranch's projects that adversely impact the Santa Clara River watershed, floodplain and the many important unique species of flora and fauna therein.

#### Response No. IE1-1:

The comment expresses opposition to Newhall Ranch projects, opining that the projects adversely impact the Santa Clara River watershed, floodplain, and unique species. With the exception of issues pertaining to the unarmored threespine stickleback, the issues raised in this comment are beyond the scope of the AEA (please see **Topical Response 1: Scope of Additional Environmental Analysis**). The general issues described in the comment were subject to evaluation and study in the CDFW 2010 Final EIR, and that analysis was not found to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to these issues.

#### Comment No. IE1-2:

The EIR does not address global warming.

#### Response No. IE1-2:

The comment states that the AEA does not address global warming. However, the comment is mistaken, as the effects of climate change on the environment, which include global warming, are discussed in Section 2.1.2 of the Draft AEA (see pp. 2-3 through 2-5). As also discussed in the AEA, because the project would result in no net increase of GHG emissions after implementation of Mitigation Measures 2-1 through 2-13, the project would not make a cumulatively considerable contribution of GHG emissions that could influence global climate change.

#### Comment No. IE1-3:

Recently I testified about the fallacy of depending on electric vehicle infrastructure to address the need to reduce GHG emissions - an intrinsic product of the project. Hybrid vehicles will always trump all-electric battery vehicles (and thus continue to produce toxic gas emissions) because the need for long range driving, from the proposed very distant subdivisions.

#### Response No. IE1-3:

The comment opines that the use of hybrid EVs "will always trump" the use of battery EVs. However, the comment provides no evidence to substantiate this opinion. Please see Response to **Comment No. 09-29**, which provides information regarding trend lines in EV sales, and **Topical Response 3: Zero Emission Vehicles at Newhall Ranch**. While the comment characterizes the provision of EV charging infrastructure as a "fallacy," as discussed in **Topical Response 3: Zero Emissions Vehicles at Newhall Ranch**, the state agency responsible for advancing the state's climate policy (i.e., CARB) and other state agencies (such as CEC and CPUC) have recognized the import of charging infrastructure that supports the deployment of EVs. The role of such infrastructure has been recognized not only by these state agencies, but also in legislation, executive orders, and implementing regulations. As such, the project's mitigation framework appropriately requires the installation of EV charging infrastructure both on and off of the project site.

#### Comment No. IE1-4:

The company owns the former rail line easement but still persists in using private, individual vehicles as the prime mover of the millions of trips in and out of the project areas.

**Response No. IE1-4:**

The comment references a former rail line easement, and seems to implicitly express support for the extension of rail service to the project site. However, the issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**). As such, no further response is required. Nonetheless, for informational purposes, the following discussion is provided.

While rail service is not proposed at this time, land is reserved for a future Metrolink rail right-of-way within the Newhall Ranch Specific Plan area. Additionally, it is noted that the Newhall Ranch TDM Plan (Mitigation Measure 2-6) contains multiple strategies that would serve to reduce the VMT by the project's residents, employees and visitors; the TDM Plan achieves the overall VMT reduction objective, in part, by providing multi-modal transportation options to the development that would be facilitated by approval of the project.

**Comment No. IE1-5:**

The floodplain is in danger:

The Oroville Dam episode, requiring the downstream evacuation of tens of thousands, is a dramatic example of a problem I pointed out in my first comments, years ago at the Los Angeles County Planning Commission - before any approvals. My concern is the potential failure of Castaic Lake Reservoir and the Bouquet Canyon Reservoir, both upstream of the flood path through the project area. God forbid that a large earthquake of the magnitude of the nineteenth century Fort Tejon trembler, which exceeds the design specification of Castaic Reservoir, causes a surge down to the ocean.

The previous flood caused by the failure of the San Francisquito Dam created tremendous devastation in what was then, the sparsely populated region. Castaic Lake is many times larger (320,000 acre ft vs. 38,168 acre-ft) - Bouquet about the same size (36,500 acre-ft) - than San Francisquito Dam.

**Response No. IE1-5:**

The comment states that the floodplain is in danger, and suggests that dam failure could occur in the event of an earthquake. The issues raised by the comment are outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issues referenced were evaluated and studied in the 2010 Final EIR (see Section 4.1, Surface Water Hydrology and Flood Control, and Section 4.17, Hazards, Hazardous Materials, and Public Safety), and the analysis of such issues was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to floodplain and dam failure issues.

**Comment No. IE1-6:**

The absurdity of raising the Landmark floodplain by massive earth movement, would not avert the catastrophe in the event of a dam failure, but also creates other serious concerns: the destruction of the many rare life forms resident on the land and "cost" in a carbon dioxide bloom at a time when science tells us that the Earth is at a tipping point.

**Response No. IE1-6:**

The comment repeats its concerns regarding floodplain and dam failure issues; please see **Response to Comment No. IE1-5** above for responsive information. As to the "cost" associated with a "carbon dioxide bloom," the comment is unclear with respect to the parameters of its concern and no further response can be provided. As discussed in **Response to Comment No. IE1-2** above, because the project would result in no net increase of GHG emissions after implementation of Mitigation Measures 2-1 through 2013, the project would not make a cumulatively considerable contribution of GHG emissions that could influence global climate change; as such, the project itself would not create a "carbon dioxide bloom."

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**IE2. Letter from Jerri Ann Boyd, dated February 13, 2017**

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**Comment No. IE2-1:**

I'm writing to urge you to reject Newhall Ranch's latest proposal; the Mission and Landmark "villages" are an ill-conceived new city cloaked in feel-good promises of "net zero" GHG emissions.

**Response No. IE2-1:**

This comment expresses disapproval of the proposals for the Mission Village and Landmark Village projects. It does not comment on any specific aspect of the AEA for the RMDP/SCP Project. No further response is required. Nonetheless, for informational purposes, the following discussion is provided.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and would not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

As to the project's commitment to achieve net zero GHG emissions, the AEA analysis was subject to independent review and evaluation by two technical experts: CARB and Ascent Environmental, Inc. (CDFW's consultant). As memorialized in a letter from the CARB to CDFW, dated November 3 which can be found in Final AEA Appendix 1:

"[C]ARB staff consulted with Department of Fish and Wildlife staff and technical experts at Ascent Environmental, the principal consultant assisting the Department. In doing so, [C]ARB staff reviewed the technical documentation provided for the evaluation of the project's total estimated GHG emissions and the reductions in emissions to be achieved through the mitigation measures. Based on staff's review, [C]ARB finds the documentation provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.

CARB's finding that the project's GHG emission reduction calculations are documented by "an adequate technical basis" is part of the body of substantial evidence that supports the AEA's GHG emissions analysis, particularly as CARB is the state agency designated with the responsibility for and expertise to implement statewide policy on global climate change and the reduction of GHG emissions.

**Comment No. IE2-2:**

In reality, many of the emissions reductions won't occur on site, or even in California, but instead, would come from carbon marketers selling offsets of an unknown quantity.

**Response No. IE2-2:**

This comment expresses disapproval of the project's GHG Reduction Plan, in particular the locational aspects of the Direct Reduction Activities. The comment provides no evidence to support its statements and does not provide a specific critique of any element of the AEA.

Please see **Response to Comment No. 09-32** for a detailed discussion of the use of direct reduction activities and carbon offsets to mitigate the project's emissions through the GHG Reduction Plan. **Response to Comment No. 09-32** provides a broad overview of the mitigation measures and the performance standards underpinning the GHG Reduction Plan, which specify that all GHG reductions used for compliance with Mitigation Measures 2-10 and 2-13 are consistent with CEQA Guidelines Section 15126.4(c)(3) and (c)(4) (allowing GHG mitigation by "[o]ff-site measures, including offsets that are not otherwise required" and "[m]easures that sequester GHGs"). The GHG Reduction Plan, through the implementation of Direct

Reduction Activities and the purchase of carbon offsets meets the requirements of CEQA, as discussed in this response and **Response to Comment Nos. 09-33** through **09-62**.

As to the locational aspects of the GHG Reduction Plan, the project's suite of mitigation measures to reduce GHG emissions has been designed in accordance with CEQA Guidelines Section 15126.4(c) and is otherwise consistent with relevant guidance from CARB and SCAQMD. Please see **Response to Comment No. 09-60** for additional discussion regarding the Locational Performance Standards applicable to the GHG reductions.

As required by Mitigation Measures 2-1 through 2-13, the project would implement many measures to reduce GHG emissions at the project site. These include designing and building residential buildings, commercial buildings, and public facilities to meet Zero Net Energy standards (MM 2-1 and 2-2), using energy-efficient heating technology for swimming pools (MM 2-3), installing EV charging stations in residences and commercial areas (MM 2-4 and 2-5), providing EV purchase subsidies to residents (MM 2-4), implementing an electric school bus and electric transit bus program (MM 2-8 and 2-9), and implementing a TDM Plan to reduce vehicle miles traveled (MM 2-6). In addition, the mitigation program requires the applicant to implement numerous other measures off-site but in Los Angeles County, including a building retrofit program in disadvantaged communities in Los Angeles County (MM 2-11), installing thousands of EV charging stations across the County (MM 2-12), and providing traffic signal synchronization in the project area (MM 2-7).

Even though CEQA does not require the project to prioritize on-site measures over off-site offset projects, the AEA incorporates the preferred geographic hierarchy recommended by SCAQMD, as indicated on p. 2-25 of the Draft AEA. Indeed, the majority of GHG reductions and the substantial majority of investment associated with such reductions would occur within the County of Los Angeles and State of California. Specifically, as required by Section X of the GHG Reduction Plan, the project applicant must implement the GHG Reduction Plan so that, in the aggregate and taking into account all on-site and off-site GHG reductions achieved by Mitigation Measures 2-1 through 2-13, along with the additional EV charging stations identified in the Final AEA, the RMDP/SCP Project shall meet, at full buildout, the following Locational Performance Standards: no less than 68 percent of the GHG reductions would be achieved within California; no less than 80 percent of the GHG reductions would be achieved within the United States; and no more than 20 percent of the GHG reductions would be achieved outside of the United States. The Locational Performance Standards apply at the RMPD/SCP project level, not to an individual village-level project.

As to the issue of carbon offsets, please see **Response to Comment No. 09-40**. As explained therein, the Applicant would primarily reduce GHG emissions through Direct Reduction Activities. To the extent that the Applicant is required to purchase carbon offsets, an ample supply is and would be available. Tens of millions are currently available or being generated, and even if demand increases, it is reasonable to assume that market forces would spur the development of new offset projects.

**Comment No. IE2-3:**

The environmental impact reports contain no clear standards to ensure that offsets represent real, enforceable, verifiable reductions that wouldn't have occurred anyway.

**Response No. IE2-3:**

This comment questions whether carbon offsets, which may be purchased by the project applicant for compliance with Mitigation Measures 2-10 and 2-13, would result in measurable GHG reductions beyond what would have otherwise occurred. The comment does not provide any evidence to support this statement nor does the comment identify a specific deficiency in the AEA analysis.

As explained above in **Response to Comment No. IE2-1**, the AEA analysis was subject to independent review and evaluation by two technical experts: CARB and Ascent Environmental. CARB's finding that the project's GHG emission reduction calculations are documented by "an adequate technical basis" is part of the body of substantial evidence that supports the AEA's GHG emissions analysis, particularly as CARB is the state

agency designated with the responsibility for and expertise to implement statewide policy on global climate change and the reduction of GHG emissions.

Please also see **Response to Comment Nos. IE15-5** and **09-32**. As discussed therein (and particularly **Response to Comment No. 09-32**), offset registries have developed a broad consensus around the standards that are necessary to verify that offsets are environmentally sound, namely, that offsets be real, permanent, quantifiable, verifiable, enforceable, and additional, defined as follows:

- ▲ “Real”: offsets may only be issued for emissions reductions that are a result of complete emissions accounting.
- ▲ “Permanent”: projects must demonstrate that the emissions reductions that have occurred are permanent and would not be reversed. For example, in the context of forestry, offset project developers must demonstrate that the carbon sequestered in the trees of the forest would not be released to the atmosphere after the fact, i.e., that the trees would not be cut down.
- ▲ “Quantifiable”: projects must rigorously quantify the emissions reductions from a project, and may only receive credits in an amount corresponding to emissions that they have actually quantified. Project developers must verify the accuracy of their emissions accounting by adhering to standardized quantification methodologies called “protocols,” which are discussed further below.
- ▲ “Validated”: to receive offset credits, emission reductions must be well documented and transparent enough to be capable of objective review by a neutral, third party verifier.
- ▲ “Enforceable”: in order to be eligible to generate offset credits from reputable programs, the implementation of the offset project must represent the legally binding commitment of the offset project developer. Once the developer undertakes the project, the developer is under a legal obligation to carry it out.
- ▲ “Additional”: the GHG emissions reductions generated by a project must be “additional,” meaning that they are only eligible to generate offset credits if they would not have occurred without the offset project. Project developers must verify additionality by adhering to the applicable protocol, as discussed further below.

All carbon offsets used for compliance with the Mitigation Measures 2-10 and 2-13 shall be real, additional, quantifiable, permanent, verifiable, and enforceable, among other performance standards identified in the GHG Reduction Plan. The GHG Reduction Plan requires the project applicant to submit an attestation from an Approved Registry that the carbon offsets meet the performance standards identified in the GHG Reduction Plan prior to retiring and relying upon any carbon offsets. Further, all GHG Mitigation Credits used for compliance with Mitigation Measures 2-10 and 2-13 must meet the performance standards identified in the GHG Reduction Plan, including “additionality” requirements, as detailed in **Response to Comment Nos. 09-32** and **09-36**.

In sum, the GHG Reduction Plan establishes a robust procedural framework and identifies specific performance standards to provide the GHG reductions relied upon for compliance with Mitigation Measures 2-10 and 2-13 satisfy CEQA.

#### **Comment No. IE2-4:**

What’s more, although Newhall is now promising “no water contact” bridge construction to protect the highly imperiled stickleback fish, there are no safeguards in place to ensure this federally protected species won’t be harmed through the life of the project.

**Response No. IE2-4:**

This comment states that the mitigation measures adopted in the AEA specifying “no water contact” bridge construction for the project do not include safeguards to protect the unarmored threespine stickleback for the life of the project. The comment offers no evidence in support of its statements.

Please see **Response to Comment No. 09-71** for a detailed discussion of this issue. As explained therein, the AEA analyzes the modified bridge and bank stabilization construction methods that avoid impacts to unarmored threespine stickleback by eliminating the need for stream diversion, fish collection, and fish relocation as previously required by Mitigation Measures BIO-44 and BIO-46, thereby eliminating the need for these two measures. As discussed in the Draft AEA, impacts from project construction on the unarmored threespine stickleback would be less than significant.

As also explained in **Response to Comment No. 09-71**, the long-term operational impacts of the bridges would be the same or less than those analyzed in the 2010 Final EIR and are less than significant. Further, any other “long-term impacts” resulting from bridge construction were raised or could have been raised in the prior legal challenge to the previously certified 2010 Final EIR; and, thus, any further challenge is beyond the scope of the AEA.

**Comment No. IE2-5:**

Moreover, The Santa Clara River is the only wild river left in Los Angeles County.

**Response No. IE2-5:**

This comment states that the Santa Clara River is the only wild river left in Los Angeles County, and does not offer any specific comment on the AEA. No further response is required.

**Comment No. IE2-6:**

That’s why I urge the county to reject these projects and not certify the current environmental impact reports, which focus solely on GHGs and stickleback.

**Response No. IE2-6:**

This comment asks the County to not certify the project’s EIR and notes that the AEA focuses only on GHG emissions and the mitigation measures related to the unarmored threespine stickleback. It does not offer any specific critique of the AEA. No further response is required.

However, it should be noted that the California Supreme Court’s 2015 decision only found issue with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. Please see the revised notice for the AEA, which limits requests for comments to the two topics addressed in the AEA. Please also see **Topical Response 1: Scope of the Additional Environmental Analysis** for further discussion.

**Comment No. IE2-7:**

The Mission and Landmark projects remain a disaster for the Santa Clara River and valley.

**Response No. IE2-7:**

This comment expresses disapproval of the Mission Village and Landmark Village projects, and does not offer any specific critique of the AEA. No further response is required.

**Comment No. IE2-8:**

And at a minimum, the county must embark on a full environmental review that reflects current standards for smart growth instead of trying to implement an outdated, 14-year-old “Newhall Specific Plan” through piecemeal environmental review.

**Response No. IE2-8:**

This comment asks the County to conduct an environmental review, including elements of smart growth, and criticizes the CEQA process used here.

As an initial matter, please see **Topical Response 1: Scope of Additional Environmental Analysis**, for information regarding the judicially-delineated parameters of the AEA. The California Supreme Court’s 2015 decision only found issue with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. Please see the revised notice for the AEA, which limits requests for comments to the two topics addressed in the AEA. Therefore, this comment is outside the scope of the AEA.

However, it should be noted that the environmental review process for the project complies fully with CEQA and does not constitute “piecemealing.” The comment correctly notes that the Newhall Ranch Specific Plan was adopted by the County in 2003, based upon an environmental impact report. The Specific Plan provides a comprehensive guide for future development of the Specific Plan area and complies fully with Government Code Sections 65450 et seq. Specific plans do not expire.

However, the Specific Plan does not entitle the project applicant to build any part of the project. Each phase of the project requires its own thorough environmental review under CEQA, including an EIR, as part of the permitting and entitlement process. The AEA is part of the environmental review for the project’s RMDP/SCP, which require state and federal permits for implementation. The Mission Village and Landmark Village projects are the first two phases of the project, and each has undergone thorough environmental review for consistency with all applicable laws and regulations, including the Specific Plan itself.

Therefore, the environmental review process for the project complies with CEQA.

### **IE3. Letter from Bruce Campbell, dated February 13, 2017**

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#### **Comment No. IE3-1:**

To whom it may concern at the California Department of Fish and Wildlife, L.A. County, and beyond,

#### **Response No. IE3-1:**

The comment is an introduction to follows and does not raise an environmental issue regarding the AEA. No further response is required.

#### **Comment No. IE3-2:**

Thanks for extending the comment time in regards to the couple portions which the massive development proponent decided to take up again following the decision in the *CBD* case at the California Supreme Court.

#### **Response No. IE3-2:**

The comment expresses appreciation for the extension of the comment period on the AEA. The comment is noted; no further response is required because the comment does not raise an environmental issue regarding the AEA.

#### **Comment No. IE3-3:**

First, I find it disturbing that the proponent for the largest development ever in California had the gall to determine for itself which sections of the EIR needed to be re-circulated. Generally, one would await guidance from the court as to what sections would need to be revised. Then, sadly, the cherry-picked topics seem to be accepted by some decision makers as sufficient. (Not the way law and agencies are supposed to operate - even in the age of Trump!)

#### **Response No. IE3-3:**

The comment objects to the scope of the AEA. Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains that the scope of the AEA was delineated pursuant to the California Supreme Court's 2015 decision.

#### **Comment No. IE3-4:**

For instance, where is the chapter regarding traffic? Clearly, the decrease in gas prices over the last approximately four years combined with increased development in the north county has led toward much more crowded roadways.

#### **Response No. IE3-4:**

The comment states that the AEA should have addressed the traffic impacts of the project. However, the issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**); as such, no further response is required. Additionally, as discussed in **Topical Response 4: Traffic Impact Analysis**, no additional traffic would be generated by any aspect of the project's modifications evaluated in the AEA. Further, the traffic analysis presented in the 2010 Final EIR accounted for future increases in traffic volumes on study area roadways. Since the completion of that EIR, there have been no substantial changes requiring major revisions to the subject traffic analysis. This comment offers no significant new information requiring additional analysis with respect to traffic issues.

#### **Comment No. IE3-5:**

Traffic congestion means more emissions - yet one would not note that due to the proponent's convenient ignoring of traffic shifts in the last decade, of GHG emissions relating to solid waste, and of GHGs related to moving and filtering water.



**Response No. IE3-5:**

The comment suggests that the AEA's GHG emissions analysis does not account for GHG emissions attributable to project-related traffic, solid waste, and water-related processes. However, Section 2 of the Draft AEA accounts for each of the referenced emission sources. (See the discussion of "Mobile Sources" on pp. 2-18 through 2-19; "Water Consumption" on p. 2-19; and, "Solid Waste" on p. 2-20.) The GHG emissions estimated by CalEEMod® for these GHG emission sources are presented in pertinent inventory tables contained in the Draft AEA. (CalEEMod® is a modeling platform developed for CAPCOA in collaboration with SCAQMD, the air district with jurisdictional boundaries covering the project area.) The modeling platform is currently used by numerous lead agencies (including Los Angeles County) when quantifying the GHG emissions associated with development projects undergoing environmental review. CalEEMod® is designed to estimate operational, on-road mobile vehicle traffic generated by a project's land uses, and specifically accounts for CO<sub>2</sub> emissions from running, start-up, and idling vehicles. CalEEMod® also accounts for GHG emissions attributable to the production of electricity to convey, treat and distribute water and wastewater, as well as the GHG emissions associated with solid waste disposal.

**Comment No. IE3-6:**

I notice that the California Supreme Court held that (pertaining to CEQA) the determination by CDFW back in 2010 which essentially declared the GHG emissions that would come from this largest development ever proposed in the State of California as insignificant was NOT supported by substantial evidence.

**Response No. IE3-6:**

The comment provides background information regarding the California Supreme Court's determination that the GHG emissions analysis in the project's 2010 Final EIR was not supported by substantial evidence. The comment does not raise an environmental issue regarding the AEA, but rather re-states information disclosed in the Draft AEA (see also **Topical Response 1: Scope of the Additional Environmental Analysis**); no further response is required.

**Comment No. IE3-7:**

Often, "evidence" can be more convincing if it can be quantified. I notice that it is mentioned that about 11,000 tons of GHGs are generated annually in the area proposed for development. Well if one looks at the "current" situation in the proposed development area, one can count trees and bushes and do related research and come up with an estimate of how much carbon is being sequestered in the vicinity in this pre-massive development phase? Yet, not only did there appear to be no attempt to try to estimate the amount of carbon sequestered, there was not even an admission that trees and vegetation have a role in sequestering carbon except to poo-poo its significance by calling such important functions merely "incremental."

**Response No. IE3-7:**

The comment states that the AEA's GHG emissions analysis fails to account for existing, on-site carbon sequestration. However, Section 2 of the Draft AEA estimates the loss in sequestered carbon attributable to the project's permanent changes to the existing, on-site conditions. (See the "Vegetation Discussion" on p. 2-20.) As illustrated in Table 2.3-2, Vegetation Change Evaluation, of the Draft AEA, the project's vegetation changes would result in the one-time release of 70,149 MT CO<sub>2</sub>e. These emissions are required to be fully mitigated by Mitigation Measure 2-10.

**Comment No. IE3-8:**

And at the same time, construction emissions are being poo-pooed as well despite known toxicity of black carbon, diesel, and other emissions.

**Response No. IE3-8:**

The comment suggests that the project's construction-related GHG emissions have not been fully disclosed. However, Section 2 of the Draft AEA estimates the construction-related GHG emissions. (See the "Construction Emissions" discussion on p. 2-17 and Table 2.3-1, Summary of GHG Emissions by Construction Stage.) All construction-related GHG emissions are required to be fully mitigated by Mitigation Measure 2-10.

As to the air quality-related impacts of the project, that subject is beyond the scope of the AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**). The subject of air quality was previously studied and evaluated by CDFW in Section 4.7, Air Quality, of the project's 2010 Final EIR; and, CDFW adopted mitigation measures to address the project's construction-related air pollutants. No legal challenge was brought against that analysis, and the courts did not find the analysis to be inadequate. The comment does not identify any basis for why supplemental analysis of air quality impacts should be required at this time.

**Comment No. IE3-9:**

In my vocal comments, I brought up that I will believe that the developers are serious about carbon sequestration when they call for the cutting of ZERO oak trees from the property. Yet there are a number of even sizable oaks targeted for removal under the massive "Village" plans.

**Response No. IE3-9:**

The comment requests that the project avoid impacting all on-site oak trees. While this issue is beyond the scope of the AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**), it is noted that any project-related activities that remove or encroach upon oak trees located on the project site necessarily would occur in accordance with the County of Los Angeles's oak tree ordinance. (See Los Angeles County Code, Title 22 [Planning and Zoning], Division 1, Chapter 22.56, Park 16 [Oak Tree Permits].) The necessary removal and/or encroachment permits would be secured as part of the village-level entitlement processes subject to the jurisdiction of the County of Los Angeles. Additionally, the project's impacts to oak trees were assessed in Section 4.5, Biological Resources, of the project's 2010 Final EIR and CDFW previously adopted mitigation measures to address the project's oak tree impacts; the analysis presented in the 2010 Final EIR was not found to be deficient by the courts and this comment has not identified any new information that requires further analysis of the issue. Please also see the **Response to Comment No. 07-9** regarding the parameters of CalEEMod®'s vegetation change/carbon sequestration methodology.

**Comment No. IE3-10:**

The only place where I could find an admission that trees / vegetation play a role in sequestering carbon GHG emissions is on page 1.0-23 under mitigation measure LV 4.23-10 where it simply says that "Los Angeles County shall confirm that the project applicant or its designee shall fully mitigate the related construction and vegetation change GHG emissions (the "Incremental Construction GHG Emissions")" by relying either on funding activities to reduce or sequester GHG emissions, or else to purchase and retire a carbon credit from elsewhere.

**Response No. IE3-10:**

The comment re-states the concern that carbon sequestration has not been factored into the project's GHG emissions analysis. Please see **Response to Comment No. IE3-7** above for relevant information that is responsive to this comment. As discussed therein, and as illustrated in the Draft AEA (see Table 2.3-5), the project's GHG emissions attributable to vegetation removal and the release of sequestered carbon would be reduced to zero through implementation of Mitigation Measure 2-10.

**Comment No. IE3-11:**

This is very weak and I object strenuously! First, the oaks and other vegetation currently storing carbon are not being funded by the proponent, thus any such funding would be to try to make up a little for fairly

widespread destruction of trees as well as scraping many properties bare of vegetation as a prelude to construction. Excuse me, these trees and bushes are already sequestering carbon in this Hwy. 5 vicinity. While I am all for sequestering carbon around the world, the current trees and plants store carbon at the site itself, and obviously, construction emissions will occur at the site itself.

**Response No. IE3-11:**

The comment again refers to the project's carbon sequestration- and construction-related GHG emissions. Please refer to **Response to Comment Nos. IE3-7 and IE3-8** for relevant information that is responsive to this comment.

**Comment No. IE3-12:**

I notice, despite zero attempt to quantify how much carbon is stored in local trees and vegetation, such a service of nature is essential - rather than "incremental."

**Response No. IE3-12:**

The comment reiterates the concern that the AEA has not accounted for the carbon stored in on-site vegetation. Please refer to **Response to Comment No. IE3-7** above for discussion of how the AEA's GHG emissions analysis accounts for emissions attributable to the project's changes to existing, on-site vegetation conditions. Also, the use of "Incremental" in Mitigation Measure 2-10 is intended to reflect that the GHG emission reductions secured pursuant to that measure shall be incrementally phased in accordance with the issuance of grading permits for village-level development.

**Comment No. IE3-13:**

In addition, I noticed that the plan is to be constructing this largest development ever in California for 30 years! Thus, the particular dangerous emissions related to construction are not just a burden on the area for a year or two, but for three decades!

**Response No. IE3-13:**

The comment refers to the air quality impacts attributable to the project's construction-related activities. Please see **Response to Comment No. IE3-8** above for relevant information in response to this comment. Additionally, as a factual clarification, the project's construction-related activities are expected to commence in 2018 and conclude in 2030 (see Draft AEA Table 2.3-1). As such, the project is not proposing a 30-year construction period.

**Comment No. IE3-14:**

A combo of the huge amount of fill planned to be deposited onto the Santa Clara River floodplain (which would be sure to result in dustier conditions in the Santa Clarita Valley (with current particulate matter already exceeding federal standards), the unrelenting plan for 30 years of construction with no suggestion of seeking to reduce emissions from construction equipment.

**Response No. IE3-14:**

The comment again refers to the air quality impacts attributable to the project's construction-related activities, and a 30-year construction period. Please see **Response to Comment Nos. IE3-8 and IE3-13** above for relevant information in response to this comment. It also is noted that the GHG emissions attributable to the project's construction-related activities would be reduced to zero through implementation of Mitigation Measure 2-10.

**Comment No. IE3-15:**

"Black carbon" is an especially bad pollutant at construction sites, so where is the plan to address that?

**Response No. IE3-15:**

The comment asks how black carbon would be addressed by the project. As discussed in **Response to Comment No. IE3-5** above, the GHG emissions were estimated using CalEEMod®. Use of this GHG emissions modeling platform accords to the requirements of CEQA Guidelines Section 15064.4(a)(1), which allows a lead agency to select the model and methodology it considers most appropriate for the analysis, even if the model or methodology may have some limitations. Currently, CalEEMod® does not estimate black carbon emissions. However, as discussed in **Response to Comment No. 08-5**, CARB has developed and would be implementing the Short-Lived Climate Pollutant Reduction Strategy (released in March 2017), the objective of which is to secure a 50 percent reduction in black carbon emissions by 2030. CARB's strategy is designed and intended for application at the state level, not to individual projects under CEQA. CARB relatedly has recognized that black carbon is not included in California's AB 32-mandated GHG emissions inventory, or international climate frameworks. The project would require, to the extent required by law, with applicable black carbon reduction strategies that the CARB or other agencies with jurisdiction over project implementation.

**Comment No. IE3-16:**

Also, diesel has over 40 known cancer-causing air pollutants. I call for a recirculation once you come up with actual methods / mitigation measures to control construction emissions.

**Response No. IE3-16:**

The comment refers to the cancer-causing effects of diesel, and requests that the AEA be recirculated to address the mitigation of construction emissions. To the extent this comment is raising air quality issues, the comment is beyond the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**). Please also see **Response to Comment No. IE3-8** above for relevant information regarding the prior assessment of the project's air quality impacts. Section 4.7 of the 2010 Final EIR considered diesel particulate matter and discussed the airborne toxic control measures adopted by CARB to reduce such emissions. As to the GHG emissions associated with the project's construction-related activities, as discussed in **Response to Comment No. IE3-14**, such emissions would be reduced to zero through implementation of Mitigation Measure 2-10.

**Comment No. IE3-17:**

The very term "Incremental Construction GHG Emissions" clearly indicate that the writer who invented this term did so in order to downplay both the toxicity of emissions from construction vehicles, as well as in order to downplay the important carbon sequestration role which current trees and vegetation of the vicinity are providing.

**Response No. IE3-17:**

The comment again objects to the use of "Incremental Construction GHG Emissions." Please see **Response to Comment No. IE3-12** above for relevant information. As explained therein, the use of "Incremental" is not intended to minimize the total quantity of construction-related GHG emissions, which would be reduced to zero through implementation of Mitigation Measure 2-10, but rather allow for the phased implementation of the mitigation requirement as project development is phased over time. The phased implementation of Mitigation Measure 2-10 accords to CEQA's nexus and proportionality requirements (see CEQA Guidelines Sections 15041 and 15126.4). Additionally, the comment's reference to the toxicity of emissions is beyond the scope of the AEA as the subject of air quality was addressed in the 2010 Final EIR and not found to be inadequate by the courts (see **Response to Comment No. IE3-8** above).

**Comment No. IE3-18:**

Now to contend with the unarmored threespine stickleback. The proponent makes it appear that this rare fish will do just fine as long as it isn't physically crushed by heavy equipment.

**Response No. IE3-18:**

The comment addresses the unarmored threespine stickleback and states that the project “proponent makes it appear that this rare fish will do just fine as long as it isn’t physically crushed by heavy equipment.”

The comment does not address any specific aspect of the Draft AEA. Thus, no further comment is required. However, the 2010 Final EIR and the Draft AEA address the full range of potential impacts on unarmored threespine stickleback, not just impacts involving physical crushing of fish by heavy equipment. (See 2010 Final EIR, Section 4.5.5.3, pp. 4.5-679–4.5-702; Draft AEA, Section 3, pp. 3-1–3-40.) In addition, the proposed No Water Contact approach to constructing bridges and bank stabilization and Mitigation Measures 3-1, 3-2, and 3-3 would effectively reduce impacts to the species to a less than significant level.

**Comment No. IE3-19:**

However, there are lots of things involved in having an area habitable for certain species, and please remember that “take” of a species does not need to involve death of a member of such species. When a project brings about significant deterioration of the habitat which a species needs to survive, due to shifts in moisture, nutrient level, dust, etc. from adding a huge amount of fill to the floodplain of the last free-flowing river in Los Angeles County while allowing some pumping from the Santa Clara River alluvial plain, that is essentially harassment and “take” since it is a downward spiral as far as diminishing quality of habitat.

**Response No. IE3-19:**

The comment states that “take” of a species does not need to involve death of a member of such species. According to the comment, “[w]hen a project brings about significant deterioration of the habitat which a species needs to survive, due to shifts in moisture, nutrient level, dust, etc., from adding a huge amount of fill to the floodplain of the last free-flowing river in Los Angeles County while allowing some pumping from the Santa Clara River alluvial plain, this is essentially harassment and ‘take’ since it is a downward spiral as far as diminishing quality of habitat.”

The comment does not address either of the two issues covered in the Draft AEA – (1) GHG emissions reductions and (2) avoiding take of unarmored threespine stickleback through a No Water Contact approach to constructing bridges and bank stabilization. Instead, the comment addresses more general impacts to unarmored threespine stickleback habitat, such as moisture, nutrient levels, dust, fill material, and groundwater pumping. These issues are beyond the scope of the Draft AEA. In addition, the 2010 Final EIR analyzed project-related impacts on unarmored threespine stickleback habitat (see 2010 Final EIR, Section 4.5.5.3, pp. 4.5-679–4.5-702). That analysis is no longer subject to legal challenge or further administrative review. No aspect of the proposed No Water Contact approach to bridge and bank stabilization construction would change or add to the impacts assessed in the 2010 Final EIR. In fact, the entire point of the revised construction approach is to reduce impacts on unarmored threespine stickleback and its habitat. Therefore, no further analysis of project impacts to unarmored threespine stickleback habitat is required.

**Comment No. IE3-20:**

Just because heavy equipment in the Santa Clara River area would not be in the wet part of the channel to run over the rare fish directly anymore (in the latest document shift), does not mean that one can conclude that there will not be increased sedimentation of the Santa Clara River that would bring a deterioration in the habitat of the unarmored threespine stickleback and other species - once there is massive ground, natural vegetation, and riverbank scraping under the Village’s proposal.

**Response No. IE3-20:**

The comment states that “increased sedimentation of the Santa Clara River...would bring a deterioration in the habitat of the unarmored threespine stickleback and other species - once there is massive ground, natural vegetation, and riverbank scraping under the Village’s proposal.”

The comment does not address either of the two issues covered in the Draft AEA – (1) GHG emissions reductions and (2) avoiding take of unarmored threespine stickleback through a No Water Contact approach to constructing bridges and bank stabilization. Instead, the comment addresses impacts to stickleback habitat resulting from increased sediment loading in the river. This issue is beyond the scope of the Draft AEA. In addition, the 2010 Final EIR analyzed project-related impacts on sediment loading, as well as impacts on unarmored threespine stickleback habitat (see 2010 Final EIR, Section 4.1, pp. 4.1-1–4.1-125; Section 4.5.5.3, pp. 4.5-679–4.5-702). Those analyses are no longer subject to legal challenge or further administrative review. No aspect of the proposed No Water Contact approach to bridge and bank stabilization construction would change or add to the impacts assessed in the 2010 Final EIR. Therefore, no further analysis of project impacts to unarmored threespine stickleback habitat is required.

**Comment No. IE3-21:**

Partly due to concern about damage due to heavy construction equipment, I call for a radius of at least ¼ of a mile around spineflower preserves.

**Response No. IE3-21:**

The comment states that, due to potential damage from heavy equipment, the commenter is requesting a one-quarter mile buffer around the spineflower preserves.

The comment does not address either of the two issues covered in the Draft AEA – (1) GHG emissions reductions and (2) avoiding take of unarmored threespine stickleback through a No Water Contact approach to constructing bridges and bank stabilization. Instead, the comment addresses potential impacts on spineflower preserves, which is an issue beyond the scope of the Draft AEA. Note that the 2010 Final EIR extensively analyzed project-related impacts on the spineflower and the spineflower preserves (see 2010 Final EIR, Section 4.5.5.3, pp. 4.5-1755–4.5-1788), and that analysis was upheld by the Court of Appeal. As a result, it is no longer subject to legal challenge or additional administrative review. No further response is required.

**Comment No. IE3-22:**

I'd like to ask: what endangered, threatened, or rare species would have their habitat negatively impacted by the placement of a massive amount of fill onto the floodplain of the Santa Clara River?

**Response No. IE3-22:**

The comment asks, “what endangered, threatened, or rare species would have their habitat negatively impacted by the placement of a massive amount of fill onto the floodplain of the Santa Clara River?”

The comment does not address the either of the two issues covered in the Draft AEA – (1) GHG emissions reductions and (2) avoiding take of unarmored threespine stickleback through a No Water Contact approach to constructing bridges and bank stabilization. Instead, the comment addresses impacts to endangered, threatened, or rare species resulting from placement of fill into the floodplain of the Santa Clara River. The 2010 Final EIR analyzed project-related impacts to endangered, threatened, or rare species. Those analyses are no longer subject to legal challenge or further administrative review. No aspect of the proposed No Water Contact approach to bridge and bank stabilization construction would change or add to the impacts assessed in the 2010 Final EIR. This issue is beyond the scope of the Draft AEA. No further response is required.

**Comment No. IE3-23:**

Will the imported fill be carefully evaluated to try to “weed out” noxious weeds and various contaminants which often accompanies “available” dirt?

**Response No. IE3-23:**

The comment asks whether the fill dirt imported to the project “be carefully evaluated to try to ‘weed out’ noxious weeds and various contaminants which often accompanies ‘available’ dirt?”

The comment does not address the either of the two issues covered in the Draft AEA – (1) GHG emissions reductions and (2) avoiding take of unarmored threespine stickleback through a No Water Contact approach to constructing bridges and bank stabilization. Instead, the comment asks a question regarding fill dirt and how it would be evaluated to eliminate noxious weeds. This issue is beyond the scope of the Draft AEA. No further response is required.

**Comment No. IE3-24:**

I did mention in my vocal comments that I understand that there are a lot of carbon / GHG emissions relating to the manufacture of cement - while it doesn't take much brainpower to realized that asphalt seems to generally be layers of hot oil over some little stones. This should also have been evaluated.

**Response No. IE3-24:**

The comment requests that the AEA estimate the GHG emissions associated with the manufacture of cement. Please see **Response to Comment No. 09-18** for information that is responsive to this comment. As explained in the referenced response, CalEEMod® does not account for such emissions, which were determined by the model's developers (including CAPCOA and SCAQMD) to be speculative due to the lack of specific information that would be necessary to inform a reasoned assessment of such emissions.

**Comment No. IE3-25:**

In addition, methane relating to trash production from the massive developments is a serious GHG emission,

**Response No. IE3-25:**

The comment describes methane released by solid waste as a “serious” GHG emissions source. In response, the modeling platform -- CalEEMod® -- used in the AEA accounts for the “GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon.” (See Draft AEA Appendix 1, p. 14.) As such, the “Solid Waste Generation” inventory data presented in the pertinent tables of the AEA (i.e., Table 2.3-3) discloses the methane emissions referenced in the comment.

**Comment No. IE3-26:**

while the proposed-for-expansion Chiquita Landfill will clearly be increasing its methane emissions if allowed to expand.

**Response No. IE3-26:**

The comment states that the proposed expansion of the Chiquita Canyon Landfill will increase methane emissions. This comment is noted for the record and will be made available to the decision makers prior to a final decision on the project. Please also note the referenced landfill expansion project is not related to the project and is not under the jurisdiction of CDFW, but rather is being considered and evaluated by the County of Los Angeles (see County of Los Angeles Project No. R2004-00559-(5); SCH No. 2005081071).

**Comment No. IE3-27:**

Are you accounting for toxic GHG emissions being emitted in far away locations - such as from a coal-fired facility in the Rocky Mtns. area or from two coal-fired facilities in Appalachia which power a uranium enrichment facility?

**Response No. IE3-27:**

The comment inquires whether GHG emissions from remote energy generation sources are accounted for in the GHG emissions analysis. Please see **Response to Comment No. 09-13**, which explains the calculation parameters of the Utility GHG Intensity Factor used in the AEA. The Utility GHG Intensity Factor represents the pounds of CO<sub>2</sub> associated with each megawatt-hour of electricity delivered by Southern California Edison (SCE), which is the electric service provider for the project site. As discussed in the referenced response, the Utility GHG Intensity Factor was derived in accordance with CalEEMod® and accounts for information specific to SCE, as well as California's Renewable Portfolio Standard (RPS). These methodological parameters are supported by substantial evidence described in the referenced response, and are appropriate for project-level analysis pursuant to CEQA Guidelines Section 15064.4(a)(1).

**Comment No. IE3-28:**

Even if a certain energy source means no more carbon emissions in the Santa Clarita area, it is likely causing damage to lungs of indigenous peoples (as well as others) as well as negatively impacting vegetation and various species in the region.

**Response No. IE3-28:**

The comment refers to indirect, non-GHG emissions-related effects of off-site energy sources. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. Please note, however, that the subject energy sources are not part of the project and are not under the jurisdiction of CDFW. The AEA's GHG emissions analysis appropriately quantifies the GHG emissions associated with the provision of electricity to the project site; however, the other effects of off-site energy generation are beyond the scope of the AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**).

**Comment No. IE3-29:**

What is presented as the AEA clearly does not meet the court mandate which called for "substantial evidence" if GHG emissions are to be declared insignificant for the proposed huge "Village" projects.

**Response No. IE3-29:**

The comment opines that the AEA's GHG emissions analysis is not supported by substantial evidence, and objects to the size and scale of the project. In response, please note that the GHG emissions analysis prepared by Ramboll Environ was subject to independent review and evaluation by two other technical experts: Ascent Environmental, Inc. (CDFW's consultant) and CARB (the state agency with the expertise and responsibility to administer state climate policy). CARB determined that the project's GHG emissions documentation "provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." The comment does not identify any specific flaw in the analysis; no further response is required.

**Comment No. IE3-30:**

Please reject this pathetic effort which refuses to even attempt to quantify carbon storage currently in the area, and also calls for no local measures to seek to mitigate for harmful emissions from construction equipment - including "black carbon" and diesel pollution.

**Response No. IE3-30:**

The comment serves as a conclusion to the comment letter, and requests that the decision makers not approve the project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. For information on carbon sequestration, construction emissions, black carbon and diesel pollution, please see **Response to Comment Nos. IE3-7, IE3-8, IE3-15, and IE3-16**, respectively.



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**IE4. Letter from Patagonia (Yvon Chouinard), dated February 12, 2017**

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**Comment No. IE4-1:**

There are so many reasons to be aghast over developments in the Santa Clara River, but we are particularly distressed for the river and wildlife. The river is the only remaining wildlife corridor. It is obvious it is a dangerous place for human to put their life savings into homes and businesses. But development for the animals spells extinction.

**Response No. IE4-1:**

The comment expresses concern regarding development in the Santa Clara River, particularly with regard to its negative effects on the river and wildlife, it serving as a wildlife corridor, its location as a place to build homes and businesses, and the potential effects of development on animals. The comment does not address any particular aspect of the AEA and, therefore, no further response can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE0-2:**

Voting NO on this misguided plan is both humanitarian and fiscally responsible. Thank you.

**Response No. IE4-2:**

The comment expresses general opposition to the project and does not raise any specific issues with regard to the potential environmental impacts of the project. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE4-3:**

To protect the river water quality and the endangered fish, the project should be moved away from the Santa Clara River.

**Response No. IE4-3:**

This comment is substantively the same as Comment No. IE15-15. Please refer to **Response to Comment No. IE15-15**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to water quality, endangered fish species, and the lack of a need to move the project.

**Comment No. IE4-4:**

Filling the floodplain with 200 million cubic yards of dirt hurts water replenishment and will massively add to the dust pollution in the Santa Clarity Valley.

**Response No. IE4-4:**

This comment is substantively the same as Comment No. IE15-16. Please refer to **Response to Comment No. IE15-16**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the intersection of floodplain-related grading activities and air quality as well as issues related to water replenishment.

**Comment No. IE4-5:**

There should be a .25 mile buffer around the spine flower preserves to protect this endangered flower. The proposed endowment is not sufficient to provide protection. We see what has happened in the valley oaks Savannah (SEA 64- no trails as promised, inadequate management to preserve the oaks, oaks dying).

**Response No. IE4-5:**

This comment is substantively the same as Comment No. IE15-17. Please refer to **Response to Comment No. IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to buffer distance around the spineflower preserves and the endowment for the spineflower preserve system.

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**IE5. Letter from Kevin Corcoran, dated February 12, 2017**

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**Comment No. IE5-1:**

I'm opposed to the scale of the Newhall Ranch Project as it is.

**Response No. IE5-1:**

The comment expresses opposition to the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. Specific concern is expressed regarding the scale of development. With regard to the project, the comment does not raise any issue concerning the adequacy of the Draft AEA which corrects the greenhouse gas analysis, demonstrates take avoidance of the unarmored threespine stickleback, and revises the MMRP. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE5-2:**

The exclusion of a traffic chapter make the supplemental document inadequate because traffic has greatly increased since the 2007 review was released and new projects have been approved. A chapter updating the traffic analysis should be added.

**Response No. IE5-2:**

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment Nos. IE15-2**, as well as **Topical Response No. 4: Traffic Impact Analysis** for a detailed discussion of issues related to the traffic analysis conducted for the project.

**Comment No. IE5-3:**

The project is still too big and impactful to the Valley and flies in the face of 21st century smart planning –it needs to be significantly scaled back and away from the Santa Clara River.

**Response No. IE5-3:**

This comment is substantively the same as Comment No. IE15-8. Please refer to **Response to Comment Nos. IE15-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the amount and location of proposed development.

## **IE6. Letter from Julie Criss-Hagerty, dated February 13, 2017**

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### **Comment No. IE6-1:**

I am a 20 year resident of Santa Clarita and I have witnessed an explosion of growth during this time, as observed by increased traffic congestion, the over taxing of our water supply, now at critical levels due to sustained drought and a steady and serious deterioration of our air quality. For these reasons and many more, I am opposed to both the Mission Village and Landmark Projects.

### **Response No. IE6-1:**

The comment expresses opposition to the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. Specific concern is expressed regarding traffic congestion, water supply, and air quality. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and would not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

### **Comment No. IE6-2:**

Of most concern to me is the flawed promise of “Zero GHG’s.”

### **Response No. IE6-2:**

This comment is substantively the same as Comment No. IE15-4. Please refer to **Response to Comment No. IE15-4**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the enforcement of the project’s commitment to achieve net zero GHG emissions.

### **Comment No. IE6-3:**

This plan appears naive and lacks measurable, provable and enforceable mitigation measures.

### **Response No. IE6-3:**

This comment is substantively the same as Comment No. IE15-7. Please refer to **Response to Comment No. IE15-7** for a detailed discussion regarding the monitoring and enforcement of the project’s mitigation measures.

### **Comment No. IE6-4:**

Dust caused by filling the floodplain with 200 million cubic yards of dirt will negatively impact our air quality.

### **Response No. IE6-4:**

This comment is substantively the same as Comment No. IE15-14. Please refer to **Response to Comment No. IE15-14**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to dust emissions associated with the project’s floodplain-related grading activities.

### **Comment No. IE6-5:**

There will be continued damage to and continued depletion of our already limited water supply.

**Response No. IE6-5:**

This comment is substantively the same as Comment No. IE15-10. Please refer to **Response to Comment No. IE15-10**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the availability of water to meet the water demand attributable to development associated with the project.

**Comment No. IE6-6:**

There will be increased traffic and GHG emissions caused not just by the addition of 70,000 people, but by all that it takes to support that addition (waste management services, increased trucking services to supply goods and services), which don't appear to be accounted for in the "Zero GHG" proposal.

**Response No. IE6-6:**

The portion of the comment that addresses traffic and GHG emissions is substantively the same as Comment No. IE15-3. Please refer to **Response to Comment Nos. IE15-3 and IE15-9**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the relationship between GHG emissions and traffic congestion. With regard to the portion of the comment that addresses GHG emissions associated with the population growth at the project site, the AEA specifically accounted for "on-road mobile sources," which are generated by "residents, workers, customers, and delivery vehicles visiting the land uses developed as part of the project." (See Draft AEA, pp. 2-18.) Please refer to **Response to Comment No. IE15-13** for a detailed discussion of issues related to the sources of GHG emissions generated by development associated with the project.

**Comment No. IE6-7:**

Finally, this project all will bulldoze over Native American sacred burial sites and threatens several endangered species.

**Response No. IE6-7:**

The portion of the comment addressing Native American resources is addressed in detail in the responses to Letter No. O36. Please refer specifically to **Response to Comment Nos. O37-14 and O37-15** for a detailed discussion of issues related to ground disturbances on the project site and potential effects to cultural resources. The portion of the comment addressing endangered species is addressed in detail in Letter No. IE15. Please refer specifically to **Response to Comment No. IE15-15**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to endangered fish species, and **Response to Comment No. IE15-17** for a detailed discussion of issues related to endangered flower species.

**Comment No. IE6-8:**

These projects leave way too big of a carbon footprint and are examples of poor 21st century planning.

**Response No. IE6-8:**

The comment expresses concerns regarding the size of the project's carbon footprint. CARB reviewed the emissions inventory for the project and determined that the AEA "provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." CARB also has identified this project as a recent example of a sustainable land use development project that has "demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions" (see p. 136 of the Draft 2017 Climate Change Scoping Plan Update).

The portion of the comment expressing concerns regarding the design of the project is substantively the same as Comment No. 212-8. Please refer to **Response to Comment No. IE15-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the amount and location of proposed development.

**Comment No. IE6-9:**

I am requesting that the County of Los Angeles and the State of California deny permits for these projects. Thank you.

**Response No. IE6-9:**

The comment expresses opposition for the permits requested for the project. The comment does not address any particular aspect of the AEA and, therefore, no further response can be provided. The comment also provides contact information. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

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**IE7. Letter from Rouzanna Egian, dated February 13, 2017**

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**Comment No. IE7-1:**

I am opposed to the Newhall Ranch phases 2 and 3 in their current size.

**Response No. IE7-1:**

The comment expresses general opposition to Newhall Ranch phases 2 and 3 based on their current size. Based on the subject line of this letter, Newhall Ranch phases 2 and 3 are the Mission Village and Landmark Village projects, which are located within the RDMP/SCP project area. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

**Comment No. IE7-2:**

The Santa Clara River is one of the last free-flowing rivers in Southern California. It should be preserved and not altered. It should not be filled in or paved in any way. The river is a scenic area which should not be damaged.

**Response No. IE7-2:**

The comment expresses a preference that the Santa Clara River be preserved and not altered, filled in, or paved in any way, and that the river is a scenic area which should not be damaged. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE7-3:**

Endangered species should receive better protections for their environment.

**Response No. IE7-3:**

The comment expresses an opinion that endangered species should receive better protections for their environment. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE7-4:**

There should be at least a 250-yard undeveloped buffer zone on the sides of the river and around endangered plants which cannot be developed.

**Response No. IE7-4:**

The comment expresses a preference that there should be at least a 250-yard undeveloped buffer zone on the sides of the river and around endangered plants which cannot be developed. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Please also refer to **Response to Comment Nos. IE15-15 and IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to buffer distance

around the Santa Clara River and spineflower preserves, and the endowment for the spineflower preserve system. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE7-5:**

No runoff should be allowed to enter the river.

**Response No. IE7-5:**

The comment expresses a preference that no runoff should be allowed to enter the river. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE7-6:**

It is improper to build homes over an oil field (Mission Village) because of health risks and environmental risks in that area.

**Response No. IE7-6:**

This comment is substantively the same as Comment No. IE15-1. Please refer to **Response to Comment No. IE15-1**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the location of proposed housing development with regard to potential health and environmental risks.

**Comment No. IE7-7:**

The traffic analysis is not adequate because it is outdated and it does not account for current or future traffic levels.

**Response No. IE7-7:**

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment No. IE15-2**, as well as **Topical Response No. 4: Traffic Impact Analysis**, for a detailed discussion of issues related to the traffic analysis conducted for the project.

**Comment No. IE7-8:**

There is a limit to the proper amount of density in a particular area. There has already been extensive development in the Santa Clarita Valley. The current proposal creates excessive development and excessive traffic in an area which should be left as agricultural land, parks and open space.

It is not OK to keep building as much density as possible in every open area. The free-flowing river and the open space should be preserved with a minimum of development.

**Response No. IE7-8:**

The comment expresses concerns regarding the amount of development associated with the project and that the area should be left as agricultural land, parks and open space. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Nonetheless, for informational purposes, development under the project is designed to accommodate projected regional population and employment growth. Relatedly, approval of the project would facilitate the development of a sustainably-designed master-planned community on a project site that has been slated for comparable development since the County of Los Angeles's 2003 approval of the Newhall Ranch Specific Plan.

The also comment expresses concerns regarding the location of proposed development and that the "free-flowing river and the open space should be preserved with a minimum of development." The comment does



not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Refer to the discussion above information regarding the location of the development associated with the project. Refer to **Response to Comment No. IE17-8** for information regarding the location of the development associated with the project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE7-9:**

The claim of “net zero” greenhouse gas emission is not believable from a large development in an open area which is experiencing global warming.

**Response No. IE7-9:**

The comment states that the “claim of ‘net zero’ GHG emissions is not believable from a large development in an open area which is experiencing global warming.” With regard to this issue, CARB reviewed the emissions inventory for the project and determined that the AEA “provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.” CARB also has identified this project as a recent example of a sustainable land use development project that has “demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions” (see p. 136 of the Draft 2017 Climate Change Scoping Plan Update). Thus, the AEA’s determination that the project would result in net zero GHG emissions is reasonable and is supported by substantial evidence.

**Comment No. IE7-10:**

The river area in its natural state is an important asset which should be preserved as much as possible in its natural state.

**Response No. IE7-10:**

The comment expresses a preference that the river should be preserved as much as possible in its natural state. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

## **IE8. Letter from Mal Gaffney, dated February 12, 2017**

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### **Comment No. IE8-1:**

Houses should not be built over a closed oil field (Mission Village). There is too great a chance that airborne VOCs will leak up into the homes.

### **Response No. IE8-1:**

This comment is substantively the same as Comment No. IE15-1. Please refer to **Response to Comment No. IE15-1**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the location of proposed housing development and the potential for VOCs to affect future on-site residents.

### **Comment No. IE8-2:**

The exclusion of a traffic chapter make the supplemental document inadequate because traffic has greatly increased since the 2007 review was released and new projects have been approved. A chapter – updating the traffic analysis should be added.

### **Response No. IE8-2:**

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment No. IE15-2**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the location of proposed housing development and the potential for VOCs to affect future on-site residents.

### **Comment No. IE8-3:**

Controlling greenhouse gases and traffic congestion are intimately related. Traffic congestion in the Santa Clarita area is already over the top and will only get worse if Landmark Village and Mission Village are built as planned. It is necessary to consider these two factors together and absolutely ensure no net increase in GHG for these projects.

### **Response No. IE8-3:**

This comment is substantively the same as Comment No. IE15-3. Please refer to **Response to Comment No. IE15-3**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the relationship between GHG emissions and traffic congestion.

### **Comment No. IE8-4:**

The promise of zero GHGs sounds good on paper but the enforcement reality is lacking:

### **Response No. IE8-4:**

This comment is substantively the same as Comment No. IE15-4. Please refer to **Response to Comment No. IE15-4**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the enforcement of the project's commitment to achieve net zero GHG emissions.

### **Comment No. IE8-5:**

There are no safeguards to track the future offsets that will need to be bought;

Will the offsets actually exist to be bought? Will enough offsets be available?

Who will assure that the offsets are actually bought?

Who will assure that the offsets are actually effective to offset the amount of GHGs needed to be offset?

**Response No. IE8-5:**

This comment is substantively the same as Comment No. IE15-5. Please refer to **Response to Comment No. IE15-5** for a detailed discussion of issues related to the use of carbon offsets to mitigate the project's GHG emissions.

**Comment No. IE8-6:**

How will the use of electric cars be monitored and enforced in order to gauge if the touted GHG reductions actually occur?

**Response No. IE8-6:**

This comment is substantively the same as Comment No. IE15-6. Please refer to **Response to Comment No. IE15-6** for a detailed discussion of issues related to how the use of electric cars would be monitored and enforced.

**Comment No. IE8-7:**

All these assurances need to be codified as enforceable mitigation measures.

**Response No. IE8-7:**

This comment is substantively the same as Comment No. IE15-7. Please refer to **Response to Comment No. IE15-7** for a detailed discussion regarding the monitoring of the project's mitigation measures.

**Comment No. IE8-8:**

The project is still too big and impactful to the Valley and flies in the face of 21st century smart planning—it needs to be significantly scaled back and away from the Santa Clara River

**Response No. IE8-8:**

This comment is substantively the same as Comment No. IE15-8. Please refer to **Response to Comment No. IE15-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the amount and location of proposed development.

**Comment No. IE8-9:**

Where's the analysis of the methane that will be generated from trash created by this massive project, what about emissions from trash truck- the GHG analysis in not sufficient.

**Response No. IE8-9:**

This comment is substantively the same as Comment No. IE15-9. Please refer to **Response to Comment No. IE15-9** for a detailed discussion of issues related to methane emissions associated with solid waste disposal as well as GHG emissions associated with the haul truck trips necessary to transport project-related solid waste.

**Comment No. IE8-10:**

The severe water cutbacks required in the SCV in the last six years are new information showing that we cannot accommodate this massive project with our current water resources. That water table dropped 70 feet and several wells went dry.

**Response No. IE8-10:**

This comment is substantively the same as Comment No. IE15-10. Please refer to **Response to Comment No. IE15-10**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the availability of water from “current resources” to meet the water demand attributable to development associated with the project.

**Comment No. IE8-11:**

There have been a lot of articles about how offsets are often a green washing scam. What guarantee do we have that the offsets being purchased as GHG mitigation will result in measurable, provable, reductions in GHG emissions beyond what would have otherwise occurred?

**Response No. IE8-11:**

This comment is substantively the same as Comment No. IE15-11. Please refer to **Response to Comment No. IE15-11** for a detailed discussion of issues related to whether the carbon offsets which may be purchased by the project applicant would result in measurable GHG reductions beyond what would have otherwise occurred.

**Comment No. IE8-12:**

Mitigation for GHG that is proposed to be bought as pollution credits in other countries is unenforceable and unverifiable. AND it will not help our local air pollution problems.

**Response No. IE8-12:**

This comment is substantively the same as Comment No. IE15-12. Please refer to **Response to Comment No. IE15-12**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the purchase of carbon offsets in other countries as well as local air quality conditions.

**Comment No. IE8-13:**

No mention or itemization of the external creators of GHG for this project, like methane from waste disposal, energy production for water delivery and desalination of waste water, off site energy production for infrastructure, auto and truck deliveries and other uses is not in the Environmental document because those chapters are excluded from the document. These issues must be discussed in order for the document to be valid.

**Response No. IE8-13:**

This comment is substantively the same as Comment No. IE15-13. Please refer to **Response to Comment No. IE15-13** for a detailed discussion of issues related to the sources of GHG emissions generated by development associated with the project.

**Comment No. IE8-14:**

Our Valley is already out of federal compliance for dust pollution (PM<sub>10</sub> and PM<sub>2.5</sub>) that cause asthma and permanent lung damage and affects our children’s health. Filling the flood plain with 200 million cubic yards of dirt will substantially add to this pollution.

**Response No. IE8-14:**

This comment is substantively the same as Comment No. IE15-14. Please refer to **Response to Comment No. IE15-14**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to dust emissions associated with the project’s floodplain-related grading activities.

**Comment No. IE8-15:**

To protect the river water quality and the endangered fish the project should be moved away from the Santa Clara River.

**Response No. IE8-15:**

This comment is substantively the same as Comment No. IE15-15. Please refer to **Response to Comment No. IE15-15**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to water quality, endangered fish species, and the lack of a need to move the project.

**Comment No. IE8-16:**

Filling the floodplain with 200 million cubic yards of dirt hurts water replenishment and will massively add to dust pollution in Santa Clarita Valley.

**Response No. IE8-16:**

This comment is substantively the same as Comment No. IE15-16. Please refer to **Response to Comment No. IE15-16**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the intersection of floodplain-related grading activities and air quality as well as issues related to water replenishment.

**Comment No. IE8-17:**

There should be a .25 mile buffer around the spine flower preserves to protect this endangered flower. The proposed endowment is not sufficient to provide protection. We see what has happened in the valley oaks Savannah (SEA 64 - no trails as promised, inadequate management to preserve the oaks, oaks dying).

**Response No. IE8-17:**

This comment is substantively the same as Comment No. IE15-17. Please refer to **Response to Comment No. IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to buffer distance around the spineflower preserves and the endowment for the spineflower preserve system.

## **IE9. Letter from Cher Gilmore, dated February 13, 2017**

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### **Comment No. IE9-1:**

(Note: this message is also attached in document form)

### **Response No. IE9-1:**

The comment provides background information regarding the transmittal parameters for the comments that follow. As the comment does not raise an environmental issue regarding the AEA, no further response is required.

### **Comment No. IE9-2:**

Thank you for receiving public input on the proposed Newhall Ranch Project - in particular the first two phases - Landmark and Mission Villages, which this message addresses. In my opinion, this whole development is a prime example of private interests overriding all reasonable measures of the public good.

### **Response No. IE9-2:**

The comment expresses appreciation for the opportunity to provide input on the project, and expresses general opposition to the project. As the comment does not raise an environmental issue regarding the AEA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and would not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

### **Comment No. IE9-3:**

First and foremost, it is proposed to be built on, and will destroy, over 140 acres of floodplain. It is *never* a good idea to build on floodplains. Floodplains store floodwaters, and given the alternating drought and flooding cycles in this area - projected to become even more extreme with increased global warming, this floodplain is absolutely critical.

### **Response No. IE9-3:**

The comment objects to the location of the development that would be facilitated by approval of the project relative to the floodplain. The issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of Additional Environmental Analysis**). As such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.1, Surface Water Hydrology and Flood Control), and the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to floodplain issues.

### **Comment No. IE9-4:**

The Los Angeles Regional Water Quality Control Board has wisely recommended that the Newhall Ranch applicant avoid development in the floodplain, but that recommendation was ignored. I hope the county and state will listen to the wisdom of the Water Quality Control Board on this matter.

### **Response No. IE9-4:**

The comment states that the LARWQCB has recommended that the project applicant avoid development in the floodplain. Please see **Response to Comment No. IE9-3** for relevant information that is responsive to this

comment. Additionally, please note that the Clean Water Action Section 401 water quality certification and waste discharge requirements issued by the LARWQCB for the project contain requirements relating to stream diversion and dewatering that are protective of the floodplain. The permit and its conditions reflect the LARWQCB's exercise of its jurisdiction in the project's entitlement processes.

**Comment No. IE9-5:**

Further, having sufficient fresh water in this area for the past six years has been increasingly problematic, and cutbacks have been required. The current population is barely sustainable in dry years now - it is not reasonable to suppose an additional 70,000 people (projected for the completed project) will have enough fresh water in future years, as global warming progresses and droughts become longer and more severe. Unless some method of storing huge amounts of water - such as underground cisterns - is undertaken in the near term, a greatly enlarged population simply will not be able to be supported here. The developers, of course, aren't bothered by this, as they will have collected their money and moved on.

**Response No. IE9-5:**

The comment suggests that the project's water supply analysis should be revisited in light of the drought. Please see **Response to Comment No. 09-100**, which explains that this issue is beyond the scope of the AEA, clarifies that drought conditions do not constitute significant new information requiring additional analysis for purposes of the CEQA, and provides background information regarding the 2010 Final EIR assessment of water resources.

**Comment No. IE9-6:**

Another problem with the development is the lack of buffer zones to protect the sensitive biological resources in the riparian areas along the Santa Clara, Southern California's last major free-flowing river. Without significant buffer zones, the natural riparian corridor would most certainly be negatively affected by such urban forces as domestic predators (cats and dogs), pollution, diseases transmitted from domestic animals to wildlife, increased artificial light at night, disruption by pedestrians and off - road vehicles, etc. These extraordinary, and endangered, natural resources should be preserved as an important part of the public commons rather than paved over and developed for private profit.

**Response No. IE9-6:**

The comment requests that buffer zones be established for the protection of riparian areas along the Santa Clara River. The issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.5, Biological Resources), and the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to buffer issues for the protection of riparian areas.

**Comment No. IE9-7:**

The project also completely disregards the rights of the Chumash and other Native American tribes to their sacred burial sites and other cultural resources in the area proposed for Newhall Ranch. These tribes were here long before we were. Why do we insist on continuing to shove them aside - once again for financial gain? Would we want some organization with a lot of money to plow up and pave over our sacred spaces?

**Response No. IE9-7:**

The comment states that the project disregards the rights of Native American tribes. The issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.10, Cultural Resources), and the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to tribal/cultural resource issues.

**Comment No. IE9-8:**

And there would be additional negative impacts on other fronts: increased air pollution, which is already a major problem in the Santa Clarita valley; vastly increased traffic in an area whose infrastructure is already inadequate; and the loss of nearly 1500 acres overall of rich agricultural land, whose long-term protection is extremely important for society's well-being.

**Response No. IE9-8:**

The comment expresses concerns regarding the project's impacts on air quality, traffic, and agricultural resources. The issues raised by the comment are outside the scope of the AEA (please see **Topical Response 1**); as such, no further response is required. Relatedly, the issues referenced were evaluated and studied in the 2010 Final EIR (see Section 4.7, Air Quality; Section 4.8, Traffic; and, Section 4.12, Agricultural Resources), and the subject analyses were not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to air quality, traffic or agricultural resources. Please also see **Topical Response 4: Traffic Impact Analysis** and **Response to Comment No. 09-102** for additional relevant information that is responsive to this comment.

**Comment No. IE9-9:**

Finally, the claim that Newhall Ranch will have net-zero emissions and will not contribute to climate change simply defies belief. Just because there would be outlets to charge electric vehicles in every house does not mean every house would have an electric vehicle - far from it.

**Response No. IE9-9:**

The comment generally objects to the AEA's conclusion that the project's mitigation framework would result in the project achieving net zero GHG emissions, without identifying any specific flaw or error therein. Notably, the GHG emissions analysis prepared by Ramboll Environ and presented in the AEA was subject to review and evaluation by CDFW's own expert GHG consultant (Ascent Environmental, Inc.) and the state agency with the expertise and responsibility for implementing state climate policy (CARB). In a letter to CDFW dated November 3, 2016, CARB concluded that the project's GHG emissions analysis was supported by "documentation [that] provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." Absent a more specific objection to the GHG emissions analysis, no further response can be provided.

As for the comment's critique of the mitigation measures designed to increase the penetration and use of zero emission vehicles at the project (see Mitigation Measures 2-4 and 2-5 in the Draft AEA), the comment again identifies no specific flaw or error in the evidence supporting the GHG emissions reduction calculations. Please see **Topical Response 3: Zero Emission Vehicles at Newhall Ranch** for additional information regarding the evidentiary basis for the referenced mitigation measures.

**Comment No. IE9-10:**

And the so-called "offsets" would be taken in other parts of the country or world. They would not affect pollution in Santa Clarita,

**Response No. IE9-10:**

The comment objects to the use of offsets pursuant to Mitigation Measures 2-10 and 2-13, opining that such emissions reductions should occur in Santa Clarita and not elsewhere. It is important to note that climate change is a global issue that is impacted by GHG emissions globally. Thus, GHG emissions reductions anywhere in the world provide benefit to addressing global climate change concerns. The comment incorrectly suggests that GHG reductions should and need to only occur within the Santa Clarita area. The comment has also not provided any evidence to substantiate the claim. Please see **Response to Comment No. F212-12** for additional responsive discussion of these issues.



**Comment No. IE9-11:**

and the proposal indicates no method of measurement or insuring that they are even legitimate. Using this kind of offset for emissions reduction has proven unreliable in cap and trade programs elsewhere, and there is no reason to believe they would be any more effective in this situation.

**Response No. IE9-11:**

The comment opines that the use of offsets pursuant to Mitigation Measures 2-10 and 2-13 is unreliable and ineffective. Please see **Response to Comment No. 09-32** for a detailed discussion of the implementation and enforcement of the off-site GHG emissions reductions that are required by the Newhall Ranch GHG Reduction Plan. As discussed in that response, the GHG Reduction Plan, as revised, contains enumerated performance standards and requirements that would generate the necessary reductions are realized in a manner that verifies their environmental integrity and accords with CEQA. Please also see **Response to Comment Nos. IE15-5 and IE15-11**, which provide additional responsive discussion of these issues.

**Comment No. IE9-12:**

With so much public opposition to this proposal for so many years, it would seem obvious that it is *not* a good idea. At the public hearing I attended, the only speakers in favor of it were individuals whose business would financially benefit from it. In my opinion, personal enrichment cannot justify the negative environmental effects and damage to a precious and rare community resource – a river and floodplain that should be part of the public commons.

**Response No. IE9-12:**

The comment opines that the project should be denied the requested approvals because of the public opposition that the project has garnered over the years. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE9-13:**

There are other options for development, if there must be further development (and I would argue that there should not be in this area). For example, the project could be greatly reduced in size and moved to the eastern part of the property next to existing urban areas, which would provide an adequate buffer zone from the river and avoid development of the floodplain.

**Response No. IE9-13:**

The comment states that, if the project site “must” be developed, then the project should be reduced in size and relocated to the eastern portion of the project site. The issue raised by the comment (i.e., an analysis of alternatives to the project) is outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR, and the subject analysis was not determined to be inadequate by the courts. It also is noted that CDFW did not adopt the applicant’s project, but rather a variation thereto that was designed to enhance environmental protections and minimize impacts. This comment offers no significant new information requiring additional analysis with respect to alternatives to the project.

**Comment No. IE9-14:**

Again, I urge you to reject not only the first two phases (Landmark and Mission Villages) of the Newhall Ranch project, but the entire Newhall Ranch proposal as currently conceived and configured, and not certify the current environmental impact reports, which are incomplete and inadequate.

**Response No. IE9-14:**

The comment reiterates its request that the project be denied the requested approvals and that the environmental documentation not be certified. As the comment does not raise any specific environmental issue regarding the AEA, no further response can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE9-15:**

Thank you for receiving public input on the proposed Newhall Ranch Project - in particular the first two phases - Landmark and Mission Villages, which this message addresses. In my opinion, this whole development is a prime example of private interests overriding all reasonable measures of the public good.

First and foremost, it is proposed to be built on, and will destroy, over 140 acres of floodplain. It is *never* a good idea to build on floodplains. Floodplains store floodwaters, and given the alternating drought and flooding cycles in this area - projected to become even more extreme with increased global warming, this floodplain is absolutely critical.

The Los Angeles Regional Water Quality Control Board has wisely recommended that the Newhall Ranch applicant avoid development in the floodplain, but that recommendation was ignored. I hope the county and state will listen to the wisdom of the Water Quality Control Board on this matter.

Further, having sufficient fresh water in this area for the past six years has been increasingly problematic, and cutbacks have been required. The current population is barely sustainable in dry years now - it is not reasonable to suppose an additional 70,000 people (projected for the completed project) will have enough fresh water in future years, as global warming progresses and droughts become longer and more severe. Unless some method of storing huge amounts of water - such as underground cisterns - is undertaken in the near term, a greatly enlarged population simply will not be able to be supported here. The developers, of course, aren't bothered by this, as they will have collected their money and moved on.

Another problem with the development is the lack of buffer zones to protect the sensitive biological resources in the riparian areas along the Santa Clara, Southern California's last major free-flowing river. Without significant buffer zones, the natural riparian corridor would most certainly be negatively affected by such urban forces as domestic predators (cats and dogs), pollution, diseases transmitted from domestic animals to wildlife, increased artificial light at night, disruption by pedestrians and off - road vehicles, etc. These extraordinary, and endangered, natural resources should be preserved as an important part of the public commons rather than paved over and developed for private profit.

The project also completely disregards the rights of the Chumash and other Native American tribes to their sacred burial sites and other cultural resources in the area proposed for Newhall Ranch. These tribes were here long before we were. Why do we insist on continuing to shove them aside - once again for financial gain? Would we want some organization with a lot of money to plow up and pave over *our* sacred spaces?

And there would be additional negative impacts on other fronts: increased air pollution, which is already a major problem in the Santa Clarita valley; vastly increased traffic in an area whose infrastructure is already inadequate; and the loss of nearly 1500 acres overall of rich agricultural land, whose long-term protection is extremely important for society's well-being.

Finally, the claim that Newhall Ranch will have net-zero emissions and will not contribute to climate change simply defies belief. Just because there would be outlets to charge electric vehicles in every house does not mean every house would have an electric vehicle - far from it.

And the so-called "offsets" would be taken in other parts of the country or world. They would not affect pollution in Santa Clarita, and the proposal indicates no method of measurement or insuring that they are even legitimate. Using this kind of offset for emissions reduction has proven unreliable in cap and trade

programs elsewhere, and there is no reason to believe they would be any more effective in this situation.

With so much public opposition to this proposal for so many years, it would seem obvious that it is *not* a good idea. At the public hearing I attended, the only speakers in favor of it were individuals whose business would financially benefit from it. In my opinion, personal enrichment cannot justify the negative environmental effects and damage to a precious and rare community resource – a river and floodplain that should be part of the public commons.

There are other options for development, if there must be further development (and I would argue that there should not be in this area). For example, the project could be greatly reduced in size and moved to the eastern part of the property next to existing urban areas, which would provide an adequate buffer zone from the river and avoid development of the floodplain.

Again, I urge you to reject not only the first two phases (Landmark and Mission Villages) of the Newhall Ranch project, but the entire Newhall Ranch proposal as currently conceived and configured, and not certify the current environmental impact reports, which are incomplete and inadequate.

**Response No. IE9-15:**

Please see **Response to Comment Nos. IE9-2 through IE9-14** above for information that is responsive to this comment, which constitutes a duplication of the comments responded to above.

## **IE10. Letter from Deanna Hanashiro, dated February 13, 2017**

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### **Comment No. IE10-1:**

Please reject Newhall Ranch's proposed Mission and Landmark Villages

### **Response No. IE10-1:**

The comment requests that CDFW reject the Mission Village and Landmark Village projects. The comment, which does not raise an environmental issue regarding the AEA, is included in this Final AEA for review and consideration by the decision-makers.

It is noted that CDFW is not CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP Project, the approval of which would facilitate development of the two referenced villages.

### **Comment No. IE10-2:**

Please protect the Santa Clara River.

Why? The current environmental impact report focuses solely on:

### **Response No. IE10-2:**

The comment requests that the project protect the Santa Clara River. The issue raised in this comment is beyond the scope of the AEA (please see **Topical Response 1: Scope of Additional Environmental Analysis**). The general issue described in the comment was subject to evaluation and study in the 2010 Final EIR, and that analysis was not found to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to River-related issues.

### **Comment No. IE10-3:**

1.) Greenhouse gas emissions: In reality, many of the emissions reductions won't occur on site or even in California.

### **Response No. IE10-3:**

The comment states that many of the GHG emissions reductions required by the AEA would not occur on the project site or in California. It is important to note that climate change is a global issue that is impacted by GHG emissions globally. Thus, GHG emissions reductions anywhere in the world provide benefit to addressing global climate change concerns. The comment incorrectly suggests that GHG reductions should and need to only occur on the project site or within the State of California. The comment has also not provided any evidence to substantiate the claim. In any case, it is noted that 53 percent of the GHG emissions reductions achieved by the project would be located on the project site through implementation of Mitigation Measures 2-1 through 2-9, 2-11 and 2-12. Implementation of the Newhall Ranch GHG Reduction Plan required by Mitigation Measures 2-10 and 2-13 also would secure a portion of its emissions reductions off of the project site but within the State of California.

### **Comment No. IE10-4:**

2.) Imperiled stickleback fish: No safeguards are in place to ensure this federally protected species won't be harmed through the life of the project.

**Response No. IE10-4:**

The comment states that no safeguards are in place to protect the unarmored threespine stickleback. However, the AEA presents a “no water contact” construction approach for the project’s bridges and bank stabilization, which specifies that all construction-related activities occur outside the wetted channel of the Santa Clara River and thereby avoid impacts to the stickleback. The AEA concludes that the project’s impacts to the unarmored threespine stickleback would be less than significant with implementation of the identified project design features and recommended Mitigation Measures 3-1, 3-2, and 3-3. The comment does not identify any specific flaw or error in this analysis, such that no further response can be provided.

**Comment No. IE10-5:**

The County must embark on a full environmental review that reflects current standards for smart growth instead of trying to implement an outdated, 14-year-old “Newhall Specific Plan” through piecemeal environmental review.

**Response No. IE10-5:**

The comment states that the County must embark on a full environmental review of the Newhall Ranch Specific Plan. In response, please note that the AEA is subject to review and certification by CDFW, not the County. Additionally, the scope of the AEA is explained in **Topical Response 1: Scope of the Additional Environmental Analysis**; please refer to that response for additional information regarding the judicial proceedings and CEQA parameters that determined the scope of this analysis.

**Comment No. IE10-6:**

Why are there plans to enlarge the nearby Chiquita Landfill and not closed as promised to the residents who are neighbors to the proposed Mission and Landmark Villages?

**Response No. IE10-6:**

The comment asks why there are plans to enlarge the nearby Chiquita Canyon Landfill. This comment is noted for the record and will be made available to the decision makers prior to a final decision on the project. Please also note the referenced landfill expansion project is not related to the project and is not under the jurisdiction of CDFW, but rather is being considered and evaluated by the County of Los Angeles (see County of Los Angeles Project No. R2004-00559-(5); SCH No. 2005081071).

**Comment No. IE10-7:**

Why is there such an uproar about trucks on the Highway 14 should the Cemex Mine be built yet there is no comment about the already congested Interstate 5 and the impact the Mission and Landmark Villages will have should they be constructed. For those in Valencia needing to be in downtown LA by 8 a.m., they currently need to leave before 6:30 a.m. Those in Castaic and Saugus need to leave even earlier. All would need to leave earlier if the Mission and Landmark Villages are built.

**Response No. IE10-7:**

The comment suggests that the AEA should contain additional analysis of the project’s traffic impacts. The issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.8, Traffic), and the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to traffic. Please also see **Topical Response 4: Traffic Impact Analysis** for additional relevant information that is responsive to this comment.

**Comment No. IE10-8:**

Why are there plans to destroy the last remaining free flowing river in Los Angeles County? And everything is being done to try to restore the Los Angeles River that was cemented over with development?

**Response No. IE10-8:**

The comment asks why the project proposes to destroy the last free flowing river in Los Angeles County. To begin, the issue raised by the comment is beyond the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**). As such, no further response is required. Nonetheless, for informational purposes, the project's 2010 Final EIR addressed the project's impacts to the Santa Clara River (see Section 4.1, Surface Water Hydrology and Flood Control, and Section 4.2, Geomorphology and Riparian Resources); that analysis was not found to be inadequate by the courts, and the comment offers no significant new information requiring additional analysis with respect to River-related impacts. It also should be noted that the comment misstates the relationship of the development facilitated by the project to the Santa Clara River, as the project contemplates the preservation and protection of a river corridor throughout the site.

**Comment No. IE10-9:**

The above three circumstances mentioned illustrate a dysfunctional personality. The left side is doing the total opposite of the right side.

**Response No. IE10-9:**

The comment, which refers to a dysfunctional personality, does not raise an environmental issue regarding the AEA. Therefore, no further response is required.

**Comment No. IE10-10:**

Thank you for your consideration of rejecting the proposed Mission and Landmark Village

**Response No. IE10-10:**

The comment expresses appreciation for the consideration of the commenter's request to reject the Mission Village and Landmark Village projects. Please see **Response to Comment No. IE10-1** above for relevant information that is responsive to this comment. The comment, which does not raise an environmental issue regarding the AEA, is included in this Final AEA for review and consideration by the decision-makers.

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**IE11. Letter from Robert Hazard, dated February 11, 2017**

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**Comment No. IE11-1:**

I would not like to see the Newhall Ranch project built along the 126 Highway. I like the open areas as many people do but if unfortunately the project does happen there are two things I would like to see implemented in the project to soften its impact.

**Response No. IE11-1:**

The comment objects to the location of the project site along State Route 126, expressing a preference for the preservation of open space. The comment does not raise an environmental issue regarding the AEA; therefore, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE11-2:**

First I think each home and park should be included with a large underground cistern to collect rain water for use on the properties where they are located. This water can be used for landscape watering and toilet flushing. This would be very valuable in drought prone areas.

**Response No. IE11-2:**

The comment recommends that each residence and park be provided with underground cisterns to collect rainwater in light of drought-related concerns. Please see **Response to Comment No. 09-100**, which explains that this issue (i.e., water supply) is beyond the scope of the AEA (see also **Topical Response 1: Scope of Additional Environmental Analysis**), clarifies that drought conditions do not constitute significant new information requiring additional analysis for purposes of CEQA, and provides background information regarding the 2010 Final EIR (see Section 4.3, Water Resources) assessment of water resources. Please note that the project would not preclude the utilization of rainwater capture systems that otherwise accord to applicable legal requirements; additionally, it is noted that the project's outdoor irrigation demand would be met with recycled water.

**Comment No. IE11-3:**

Second because the Newhall Ranch project is located in between two mountain ranges and along a river, wildlife can abundant in the area. There should be a wildlife corridor or bridge which spans the 126 highway and allows wildlife to have free range between each mountain range and access to the water in the river.

**Response No. IE11-3:**

The comment recommends that a wildlife corridor or bridge that spans State Route 126 be provided. The issue (i.e., wildlife corridors) raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.5, Biological Resources), and the subject analysis was not determined to be inadequate by the courts. As provided in Section 4.5 of the 2010 Final EIR, mitigation measures previously adopted by the County of Los Angeles in connection with its approval of the Newhall Ranch Specific Plan, as well as mitigation measures adopted by CDFW, would reduce the project's impacts with respect to wildlife corridors would be a less-than-significant level. This comment offers no significant new information requiring additional analysis with respect to wildlife corridor issues.

**Comment No. IE11-4:**

Both of these ideas can funded by including them in the original cost of the home price.

**Response No. IE11-4:**

The comment recommends that the costs of providing underground cisterns and wildlife corridor be passed through to home buyers. The comment does not raise an environmental issue regarding the AEA; therefore, no further response is required.

**Comment No. IE11-5:**

Please pass along these ideas.

**Response No. IE11-5:**

The comment requests that the ideas discussed along in the comment letter be passed along. The comment does not raise an environmental issue regarding the AEA; therefore, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.



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**IE12. Letter from Cynthia Harris, dated February 12, 2017**

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**Comment No. IE12-1:**

*These three Oak Tree Permits are requesting the removal of 11, 143, and 65 trees = (218-total trees requested to be removed) of these 10 are Heritage Oak Trees reaching at 45-inches-high, thirty-six inches around or more.*

*Also over 58 Oak Trees are slated for major encroachment into their protected zones. Of these two are Heritage-Oakes.*

**Response No. IE12-1:**

The comment refers to the project's encroachment upon oak trees. While this issue is beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**), it is noted that any project-related activities that remove or encroach upon oak trees located on the project site necessarily would occur in accordance with the County of Los Angeles' oak tree ordinance. (See Los Angeles County Code, Title 22 [Planning and Zoning], Division 1, Chapter 22.56, Park 16 [Oak Tree Permits].) The necessary removal and/or encroachment permits would be secured as part of the village-level entitlement processes subject to the jurisdiction of the County of Los Angeles. Additionally, the project's impacts to oak trees previously were assessed in the 2010 Final EIR (see Section 4.5, Biological Resources), and that analysis was not found to be deficient by the courts. This comment offers no significant new information requiring additional analysis with respect to oak tree issues.

**Comment No. IE12-2:**

*The removal of the two-hundred and eighteen Native California Oak Trees is not only eliminating an irreplaceable protective natural resource which is part of the 13-million acres of oak woodlands and forest in California.*

**Response No. IE12-2:**

The comment states that the removal of oak trees eliminates an irreplaceable resource. Please see **Response to Comment No. IE12-1** above for relevant information that is responsive to this comment.

**Comment No. IE12-3:**

*Their destruction would remove the 218-CO<sub>2</sub>-carbon absorbers as part of the loss of the 675-million-metric TONS of carbon absorbed by Oak Trees and in the understory vegetation, downed woody material and soil horizons. This is in a study by "7 Tom Gaman for the California Oak Foundation of the US Forest Service Inventory and Analysis Summer 2008. This report was published (2008) before the record drought cause millions of Oak Trees to die, removing even more "Sequesters" from the environment. The carbon-inventory for Oak Forest and Woodlands of California would be gravely reduced by the removal of these 218-Oak Trees.*

**Response No. IE12-3:**

The comment asserts that removal of oak trees would result in lost carbon absorbers. While accurate when viewed exclusively, the comment fails to consider the entire scope of the project's GHG emissions mitigation framework, which accounts for and mitigates all of the project's GHG emissions. Relatedly, Mitigation Measure 2-10 specifies that the increase in GHG emissions attributable to the project's changes to the existing, on-site vegetation is reduced to zero.

The comment also states that 675 million metric tons of carbon have been absorbed by oak trees and understory shrubs, coarse wood debris, duff and litter carbon and soil organic matter throughout California.<sup>1</sup> The comment refers to all the oak forests spread through 13 million acres in California.<sup>2</sup> The comment does not quantify or relate the number of trees specific to the project. However, using the 218-tree count referred to in the comment, the project site contains roughly 0.00005 percent of the total oak tree cover in California.<sup>2</sup>

The AEA is robust in its methodology to calculate the carbon release and sequestration for the project from vegetation changes using CalEEMod®, which follows IPCC guidelines. CalEEMod® provides a platform to calculate both construction emissions and operational emissions from a land use development project, and estimates one-time vegetation sequestration changes resulting from permanent changes to the existing site conditions and new tree plantings. This model was developed under the auspices of SCAQMD, which is the air district with jurisdictional boundaries covering the project site, and received input from other California air districts, and is currently used by numerous lead agencies when quantifying the emissions associated with development projects undergoing environmental review. CalEEMod® uses widely-accepted models for emission estimates combined with appropriate default data that can be used if site-specific information is not available. CalEEMod® contains default values and existing regulation methodologies to use in each specific local air district region. Appropriate statewide default values can be used if regional default values are not defined. Ramboll Environ used default factors for the Los Angeles county area (within the SCAQMD jurisdiction) when preparing the GHG emission inventory, unless otherwise noted.

In accordance with the IPCC guidelines,<sup>3</sup> the total amount of carbon released from the project's vegetation removal activities is calculated based on the assumption that the existing vegetation becomes DOM upon removal during the site preparation phase. Therefore, the 70,149 MT CO<sub>2</sub>e identified in Draft AEA Table 2.3-2, Vegetation Change Evaluation, is the carbon released as estimated by converting the DOM biomass from the existing vegetation to CO<sub>2</sub>e emissions in accordance with the IPCC guidelines. (See Draft AEA Appendix 1, Section 2.2.2 and Table 2-10b.) The estimated 70,149 MT CO<sub>2</sub>e is the one-time release of GHG emissions from removed vegetation biomass; it is not assumed that the vegetation can absorb more CO<sub>2</sub>e each year if it remains in place. IPCC's position is also that, when trees and vegetation reach maturity (are "full grown"), there would be no further net carbon sequestration (i.e., the carbon released from dead biomass would be balanced with carbon sequestration from the growing biomass).<sup>4</sup>

The comment also mentions that millions of oak trees have died as the result of the recent drought, but provides no evidence to substantiate this point. Additionally, the observation, if accurate, does not raise an environmental issue concerning the AEA. Drought conditions are cyclical, as seen from the recent winter 2016-2017 rains and snowfall.

#### **Comment No. IE12-4:**

*An Inventory of Carbon and California Oaks: California oak woodlands and forest could sequester a BILLION tons of carbon, Addendum to Oaks 2040, by Tom Gaman, Registered Professional Forester, states "Oaks are."...normally with out prolonged drought, "long-lived trees. If we assume that our current oak woodlands and forest average 100-years of age (as clearly the Oak Trees in these projects as noted by the number of Heritage Oak Trees present), then we can expect to sequester almost three-million tons of additional carbon a year by protecting and conserving these Oak Trees throughout the 21st century."*

<sup>1</sup> An inventory of Carbon and California Oaks. Available at: <http://californiaoaks.org/wp-content/uploads/2016/04/CarbonResourcesFinal.pdf>; Accessed: April 2017.

<sup>2</sup> Assuming an average crown radius of 5 meters for all Oak Trees on site.

<sup>3</sup> IPCC, "2006 IPCC Guidelines for National Greenhouse Gas Inventories" (2006), Volume 4: Agriculture, Forestry and Other Land Use, Chapter 2: Generic Methodologies Applicable to Multiple Land-Use Categories, p. 2.25, available at [http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4\\_Volume4/V4\\_02\\_Ch2\\_Generic.pdf](http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4_Volume4/V4_02_Ch2_Generic.pdf), accessed on February 17, 2017.

<sup>4</sup> "Appendix A: Calculation Details for CalEEMod," prepared for CAPCOA and prepared by ENVIRON International Corporation and California Air Districts (July 2013), p. 47, available at <http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixa.pdf?sfvrsn=2>, accessed on February 17, 2017.

**Response No. IE12-4:**

The comment provides background information on the extent of carbon sequestration that is theoretically possible for all oak trees and forests within California, but does not specify how much carbon could be sequestered by the trees located on the project site. As discussed in **Response to Comment No. IE12-3** above, the AEA has estimated the emissions associated with the project's on-site vegetation changes using CalEEMod®, a tool that takes the change in vegetation land uses and generates one-time emissions. CalEEMod® uses the change in ability to sequester CO<sub>2</sub> as a basis for the emissions estimate, and this method fully estimates the emissions that result from the vegetation land use change.

The AEA follows IPCC guidelines<sup>5</sup> to estimate the land use change emissions for vegetation. The AEA's analysis assumed 20 years of active growth and sequestration, after which no further sequestration occurs. The IPCC states, "the accumulation of carbon in biomass slows with age, and thus for trees greater than 20 years of age, increases in biomass carbon are assumed [to be] offset by losses from pruning and mortality." The IPCC's position is also that, when trees and vegetation reach maturity (are "full grown"), there would be no further net carbon sequestration (i.e., the carbon released from dead biomass would be balanced with carbon sequestration from the growing biomass). Thus, the AEA correctly assumes that no further active growth and sequestration would occur in these trees that have already reached maturity.

Contrary to the comment, IPCC's guidelines provide that trees older than 20 years in age are carbon neutral. Thus, the comment overestimates the sequestration benefits that are lost from the removal of trees.

**Comment No. IE12-5:**

*Additionally, "California is estimated to be at risk of losing 750,000 acres of oak forest and woodland by the year 2040." This means that up to 33-million tons of sequestered carbon are at risk of entering the atmosphere should development processes eliminate these oak woodlands and forest, and their associated carbon pools."*

**Response No. IE12-5:**

The comment provides background information regarding the potential loss of total acreage in California's oak forest and woodland vegetation communities in 2040. The comment does not raise an environmental issue regarding the AEA; therefore, no further response is required.

**Comment No. IE12-6:**

*The Santa Clare River is critical to supply a water source to the many oak trees along it banks.*

**Response No. IE12-6:**

The comment provides factual background information regarding the role of the Santa Clara River as a water source to oak trees along its banks, but does not raise an environmental issue regarding the AEA; therefore, no further response is required.

**Comment No. IE12-7:**

*It would be impossible to create a "negative green-house emission" by granting these Oak Tree Removal permits. The sequestering carbon lost must be an issue addressed in these projects.*

**Response No. IE12-7:**

The comment states that removing oak trees cannot result in "negative green-house emission," and asks that the loss of carbon sequestration be addressed in the AEA. In response, the AEA does not state that the

<sup>5</sup> IPCC, "2006 IPCC Guidelines for National Greenhouse Gas Inventories" (2006), Volume 4: Agriculture, Forestry and Other Land Use, Chapter 2: Generic Methodologies Applicable to Multiple Land-Use Categories, p. 2.25, available at [http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4\\_Volume4/V4\\_02\\_Ch2\\_Generic.pdf](http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4_Volume4/V4_02_Ch2_Generic.pdf), accessed on February 17, 2017.

project would achieve negative GHG emissions as a result of its removal of existing vegetation; instead, the AEA identifies the one-time release of 70,149 MT CO<sub>2</sub>e as a result of such activities (see Draft AEA Table 2.3-2). Additionally, as discussed in response to previous comments, the AEA follows the IPCC's guidelines regarding the 20-year active tree growth period for all tree types. The AEA uses an approved methodology (CalEEMod®) to estimate the emissions that result from a change in vegetation land use, and these emissions would be offset through implementation of Mitigation Measure 2-10. In summary, the change in carbon sequestration is accounted for in the AEA.

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## IE13. Letter from Randy Martin, dated February 10, 2017

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### Comment No. IE13-1:

- ▲ Houses should not be built over a closed oil field (Mission Village). There is too great a chance that airborne VOCs will leak up into the homes.

### Response No. IE13-1:

This comment is substantively the same as Comment No. IE15-1. Please refer to **Response to Comment No. IE15-1**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the location of proposed housing development and the potential for VOCs to affect future on-site residents.

### Comment No. IE13-2:

- ▲ The exclusion of a traffic chapter make the supplemental document inadequate because traffic has greatly increased since the 2007 review was released and new projects have been approved. A chapter updating the traffic analysis should be added.

### Response No. IE13-2:

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment No. IE15-2**, as well as **Topical Response No. 4: Traffic Impact Analysis** for a detailed discussion of issues related to the traffic analysis conducted for the project.

### Comment No. IE13-3:

- ▲ Controlling greenhouse gases and traffic congestion are intimately related. Traffic congestion in the Santa Clarita area is already over the top and will only get worse if Landmark Village and Mission Village are built as planned. It is necessary to consider these two factors together and absolutely ensure no net increase in GHG for these projects.

### Response No. IE13-3:

This comment is substantively the same as Comment No. IE15-3. Please refer to **Response to Comment No. IE15-3**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the relationship between GHG emissions and traffic congestion.

### Comment No. IE13-4:

- ▲ The promise of zero GHGs sounds good on paper but the enforcement reality is lacking:

### Response No. IE13-4:

This comment is substantively the same as Comment No. IE15-4. Please refer to **Response to Comment No. IE15-4**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the enforcement of the project's commitment to achieve net zero GHG emissions.

### Comment No. IE13-5:

There are no safeguards to track the future offsets that will need to be bought;  
 Will the offsets actually exist to be bought? Will enough offsets be available?  
 Who will assure that the offsets are actually bought?  
 Who will assure that the offsets are actually effective to offset the amount of GHGs needed to be offset?

**Response No. IE13-5:**

This comment is substantively the same as Comment No. IE15-5. Please refer to **Response to Comment No. IE15-5** for a detailed discussion of issues related to the use of carbon offsets to mitigate the project's GHG emissions.

**Comment No. IE13-6:**

How will the use of electric cars be monitored and enforced in order to gauge if the touted GHG reduction actually occur?

**Response No. IE13-6:**

This comment is substantively the same as Comment No. IE15-6. Please refer to **Response to Comment No. IE15-6** for a detailed discussion of issues related to how the use of electric cars would be monitored and enforced.

**Comment No. IE13-7:**

All these assurances need to be codified as enforceable mitigation measures.

**Response No. IE13-7:**

This comment is substantively the same as Comment No. IE15-7. Please refer to **Response to Comment No. IE15-7** for a detailed discussion regarding the monitoring of the project's mitigation measures.

**Comment No. IE13-8:**

The project is still too big and impactful to the Valley and flies in the face of 21st century smart planning – it needs to be significantly scaled back and away from the Santa Clara River

**Response No. IE13-8:**

This comment is substantively the same as Comment No. IE15-8. Please refer to **Response to Comment No. IE15-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the amount and location of proposed development.

**Comment No. IE13-9:**

- ▲ Where's the analysis of the methane that will be generated from trash created by this massive project, what about emissions from trash truck - the CHG analysis in not sufficient

**Response No. IE13-9:**

This comment is substantively the same as Comment No. IE15-9. Please refer to **Response to Comment No. IE15-9** for a detailed discussion of issues related to methane emissions associated with solid waste disposal as well as GHG emissions associated with the haul truck trips necessary to transport project-related solid waste.

**Comment No. IE13-10:**

- ▲ The severe water cutbacks required in the SCV in the last six years are new information showing that we cannot accommodate this massive project with our current water resources. That water table dropped 70 feet and several wells went dry.

**Response No. IE13-10:**

This comment is substantively the same as Comment No. IE15-10. Please refer to **Response to Comment No. IE15-10**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed

discussion of issues related to the availability of water from “current resources” to meet the water demand attributable to development associated with the project.

**Comment No. IE13-11:**

- ▲ There have been a lot of articles about how offsets are often a green washing scam. What guarantee do we have that the offsets being purchased as GHG mitigation will result in measurable, provable, reductions in GHG emissions beyond what would have otherwise occurred?

**Response No. IE13-11:**

This comment is substantively the same as Comment No. IE15-11. Please refer to **Response to Comment No. IE15-11** for a detailed discussion of issues related to whether the carbon offsets which may be purchased by the project applicant would result in measurable GHG reductions beyond what would have otherwise occurred.

**Comment No. IE13-12:**

- ▲ Mitigation for GHG that is proposed to be bought as pollution credits in other countries is unenforceable and unverifiable. AND it will not help our local air pollution problems.

**Response No. IE13-12:**

This comment is substantively the same as Comment No. IE15-12. Please refer to **Response to Comment No. IE15-12**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the purchase of carbon offsets in other countries as well as local air quality conditions.

**Comment No. IE13-13:**

- ▲ No mention or itemization of the external creators of GHG for this project, like methane from waste disposal, energy production for water delivery and desalination of waste water, off site energy production for infrastructure, auto and truck deliveries and other uses is not in the Environmental document because those chapters are excluded from the document. These issues must be discussed in order for the document to be valid

**Response No. IE13-13:**

This comment is substantively the same as Comment No. IE15-13. Please refer to **Response to Comment No. IE15-13** for a detailed discussion of issues related to the sources of GHG emissions generated by development associated with the project.

**Comment No. IE13-14:**

- ▲ Our Valley is already out of federal compliance for dust pollution (PM10 and PM mil) that causes asthma and permanent lung damage and affects our children’s health. Filling the flood plain with 200 million cubic yards of dirt will substantially add to this pollution.

**Response No. IE13-14:**

This comment is substantively the same as Comment No. IE15-14. Please refer to **Response to Comment No. IE15-14**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to dust emissions associated with the project’s floodplain-related grading activities.

**Comment No. IE13-15:**

- ▲ To protect the river water quality and the endangered fish, the project should be moved away from the Santa Clara River.

**Response No. IE13-15:**

This comment is substantively the same as Comment No. IE15-15. Please refer to **Response to Comment No. IE15-15**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to water quality, endangered fish species, and the lack of a need to move the project.

**Comment No. IE13-16:**

Filling the floodplain with 200 million cubic yards of dirt hurts water replenishment and will massively add to dust pollution in the Santa Clarita Valley.

**Response No. IE13-16:**

This comment is substantively the same as Comment No. IE15-16. Please refer to **Response to Comment No. IE15-16**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the intersection of floodplain-related grading activities and air quality as well as issues related to water replenishment.

**Comment No. IE13-17:**

- ▲ There should be a .25 mile buffer around the spine flower preserves to protect this endangered flower. The proposed endowment is not sufficient to provide protection. We see what has happened in the valley oaks Savannah (SEA 64 - no trails as promised, inadequate management to preserve the oaks, oaks dying)

**Response No. IE13-17:**

This comment is substantively the same as Comment No. IE15-17. Please refer to **Response to Comment No. IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to buffer distance around the spineflower preserves and the endowment for the spineflower preserve system.



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**IE14. Letter from Tracy McAnany, dated February 13, 2017**

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**Comment No. IE14-1:**

I'm writing to urge you to reject Newhall Ranch's latest proposal; the Mission and Landmark "villages" are an ill-conceived new city cloaked in feel-good promises of "net zero" greenhouse gas emissions.

**Response No. IE14-1:**

This comment expresses disapproval of the proposals for the Mission Village and Landmark Village projects. It does not comment on any specific aspect of the AEA for the RMDP/SCP Project and, therefore, no further response is required or can be provided. This comment is substantively the same as Comment No. IE2-1. Please refer to **Response to Comment No. IE2-1** for a detailed discussion regarding the project's commitment to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and would not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

**Comment No. IE14-2:**

In reality, many of the emissions reductions won't occur on site, or even in California, but instead, would come from carbon marketers selling offsets of an unknown quantity.

**Response No. IE14-2:**

This comment expresses disapproval of the project's GHG Reduction Plan, in particular the locational aspects of the Direct Reduction Activities. The comment provides no evidence to support its statements and does not provide a specific critique of any element of the AEA; therefore, no further response is required or can be provided. This comment is substantively the same as Comment No. IE2-2. Please refer to **Response to Comment No. IE2-2** for a detailed discussion of the use of direct reduction activities and carbon offsets to mitigate the project's emissions through the GHG Reduction Plan. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE14-3:**

The environmental impact reports contain no clear standards to ensure that offsets represent real, enforceable, verifiable reductions that wouldn't have occurred anyway.

**Response No. IE14-3:**

This comment is substantively the same as Comment No. IE2-3. Please refer to **Response to Comment No. IE2-3** for a detailed discussion of how carbon offsets, which may be purchased by the project applicant for compliance with Mitigation Measures 2-10 and 2-13, would result in measurable GHG reductions beyond what would have otherwise occurred. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE14-4:**

What's more, although Newhall is now promising "no water contact" bridge construction to protect the highly imperiled stickleback fish, there are no safeguards in place to ensure this federally protected species won't be harmed through the life of the project.

**Response No. IE14-4:**

This comment is substantively the same as Comment No. IE2-4. Please refer to **Response to Comment No. IE2-4** for a detailed discussion of the proposed modified bridge and bank stabilization construction methods, which avoid impacts to unarmored threespine stickleback by eliminating the need for stream diversion, fish collection, and fish relocation as previously required by Mitigation Measures BIO-44 and BIO-46, thereby eliminating the need for these two measures. As discussed in the Draft AEA, impacts from project construction on the unarmored threespine stickleback would be less than significant. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE14-5:**

That's why I urge the county to reject these projects and not certify the current environmental impact reports, which focus solely on greenhouse gasses and stickleback.

**Response No. IE14-5:**

This comment asks the County to not certify the project's EIR and notes that the AEA focuses only on GHG emissions and the mitigation measures related to the unarmored threespine stickleback. It does not offer any specific critique of the AEA and, therefore, no further response is required or can be provided. In addition, this comment is substantively the same as Comment No. IE2-6. Please refer to **Response to Comment No. IE2-6**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE14-6:**

The Mission and Landmark projects remain a disaster for the Santa Clara River and valley.

**Response No. IE14-6:**

This comment expresses disapproval of the Mission Village and Landmark Village projects, and does not offer any specific critique of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE14-7:**

And at a minimum, the county must embark on a full environmental review that reflects current standards for smart growth instead of trying to implement an outdated, 14-year-old "Newhall Specific Plan" through piecemeal environmental review.

**Response No. IE14-7:**

This comment is substantively the same as Comment No. IE2-8. Please refer to **Response to Comment No. IE2-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA, as well as project compliance with all CEQA requirements. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

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**IE15. Letter from Jason McCaffrey, dated February 13, 2017**

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**Comment No. IE15-1:**

- ▲ Houses should not be built over a closed oil field (Mission Village). There is too great a chance that airborne VOCs will leak up into the homes.

**Response No. IE15-1:**

The issues raised by the comment relate to the analysis of air quality and hazardous materials-related impacts, which are issues outside the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). As such, no further response is required. In addition, no further response is required because this issue was not presented to CDFW prior to certification of the 2010 Final EIR; accordingly, there has been a failure to exhaust administrative remedies. (See Pub. Resources Code, Section 21177.)

In any event, the project's 2010 Final EIR, and specifically Section 4.17 (Hazards, Hazardous Materials, and Public Safety) therein, provides a detailed assessment of potential impacts with respect to abandoned oil wells, known or potential contaminated soil, and physical hazards related to oil development equipment and debris. The assessment is based on a Hazards Evaluation located in Appendix 4.17 of the project's EIR, which was prepared to identify hazardous waste issues related to former or current operations within the project area and in the surrounding vicinity.

The 2010 Final EIR analyzed contaminants commonly associated with oil and natural gas fields, including volatile organic compounds (VOCs). (See 2010 Final EIR, p. 4.17-16.) The EIR concluded that, with implementation of the identified mitigation measures, potential impacts to hazards, hazardous materials, and public safety would be less than significant. (See 2010 Final EIR, p. 4.17-131.) For example, implementation of Mitigation Measures PH-11 and PH-12 would remediate any contamination per regulatory standards and reduce any associated hazards to less than significant. In addition, implementation of Mitigation Measure PH-8 would reduce potential impacts from abandoned oil wells to less than significant by providing for the application of construction-related BMPs. The project also would comply with Mitigation Measure PH-2, which requires, pursuant to Los Angeles Building Code Section 308(d), methane gas protection systems and/or evaluations in accordance with current California Department of Conservation, Division of Oil, Gas, & Geothermal Resources (DOGGR) rules and regulations, where applicable.

In addition to the analysis provided in the 2010 Final EIR, the County of Los Angeles's Mission Village EIR (SCH No. 2005051143) also shows that oil field impacts would be less than significant. As background, the 2010 Final EIR analyzed the impacts associated with development within the Newhall Ranch Specific Plan and portions of the VCC and Entrada planning areas, because approval and implementation of the project would facilitate build-out of these areas. However, the project applicant also has applied to the County of Los Angeles for tentative tract (subdivision) maps with accessory entitlements for portions of the Specific Plan area, including the Mission Village site referenced in the comment. (2010 Final EIR, p. 1.0-23.) The County is processing those applications, and previously certified a project-level EIR for the Mission Village project.

As to the air quality and hazardous materials-related issues raised in the comment, the County's Mission Village EIR (see Section 4.19, Environmental Safety, therein) provides a detailed analysis of the potential environmental safety impacts relative to development of the Mission Village project site, including the potential impacts of former oil and gas production on the project site. In fact, in response to comments on the Mission Village EIR submitted by the County Fire Department regarding potential impacts associated with petroleum hydrocarbon soil contamination and vapor intrusion, a Limited Soil Vapor Survey for the Mission Village project site was prepared to test the site for potential vapor intrusion related to methane, light end petroleum hydrocarbons, and VOCs. (See Mission Village Revised Draft EIR, p. 4.19-40b.) Based on the laboratory analysis, the vapor samples were reported not to contain detectable concentrations of methane or total petroleum hydrocarbons (TPHs) in the gasoline range. (*Id.* at p. 4.19-40c.) Additionally, the soil vapor samples were analyzed for VOCs and no detectable concentrations of VOCs were identified, with the

exception of a sample taken at a location of a former drilling or production sump, which recorded 0.013 micrograms per liter ( $\mu\text{g}/\text{l}$ ) of perchloroethylene (PCE). (*Ibid.*) This PCE concentration is below the California Human Health Screening Level (CHHSL) for PCE, and, therefore, does not pose an immediate threat to human health or the environment. (*Ibid.*) However, based on the recommendation in the Limited Soil Vapor Survey, Mitigation Measure MV 4.19-13 was adopted by the County to verify that the low concentration level of PCE is remediated prior to grading. (*Ibid.*) The Revised Draft EIR concluded that, with implementation of the identified mitigation, vapor intrusion impacts resulting from residual petroleum hydrocarbons in the soil do not pose an immediate threat to human health or the environment, and would not result in a significant environmental safety impact. (See *id.* at p. 4.19-1.) The Mission Village Revised Draft EIR (October 2011), Section 4.19, Environmental Safety, and its supporting technical appendices is hereby incorporated by reference.

The comment offers no significant new information requiring additional analysis with respect to oil field and airborne VOC issues. Because the comment does not raise any specific issue regarding the analysis provided in the AEA, no further response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.

**Comment No. IE15-2:**

- ▲ The exclusion of a traffic chapter make the supplemental document inadequate because traffic has greatly increased since the 2007 review was released and new projects have been approved. A chapter updating the traffic analysis should be added.

**Response No. IE15-2:**

The comment states that the AEA should have contained additional traffic analysis. However, the issue raised by the comment is outside the scope of the AEA; as such, no further response is required. Please see **Topical Response 1: Scope of Additional Environmental Analysis** for relevant information.

Although the comment is beyond the scope of the AEA, **Topical Response 4: Traffic Impact Analysis** provides additional information that is responsive to this comment. As discussed therein, the traffic analysis presented in the 2010 Final EIR accounted for future increases in traffic volumes on study area roadways; since completion of that EIR, there have been no substantial changes requiring major revisions to the subject traffic analysis.

**Comment No. IE15-3:**

- ▲ Controlling GHGs and traffic congestion are intimately related. Traffic congestion in the Santa Clarita area is already over the top and will only get worse if Landmark Village and Mission Village are built as planned. It is necessary to consider these two factors together and absolutely ensure no net increase in GHG for these projects.

**Response No. IE15-3:**

The comment notes the relationship between GHG emissions and traffic congestion. To the extent this comment is addressing traffic congestion in general or vehicle emissions other than GHGs, this comment is beyond the scope of the AEA, as explained in **Response to Comment No. IE15-2** above and **Topical Response 1**. While traffic, air quality, and criteria pollutant concerns were raised in the underlying proceedings, such analysis was not found deficient by the courts.

As background, the 2010 Final EIR evaluated the project's traffic volumes and the impact of those volumes on roadway capacity. Based on that analysis and the corresponding mitigation recommendations, the project would mitigate all of its traffic impacts to less-than-significant levels. The comment does not provide any evidence that traffic congestion would be different than what was analyzed in the AEA (and in the underlying proceedings). Further, implementation of the project's GHG emissions mitigation framework (see Mitigation Measures 2-6 and 2-7) would serve to reduce congestion and project-related GHG emissions. As there are

no project changes that would increase traffic impacts relative to what was previously analyzed and upheld, no additional analysis of traffic is needed.

Finally, GHG emissions generated by project-related traffic are accounted for in the AEA. The project's GHG emissions were estimated utilizing CalEEMod®, a modeling platform developed for CAPCOA in collaboration with SCAQMD, the air district with jurisdictional boundaries covering the project area. The modeling platform is currently used by numerous lead agencies (including Los Angeles County) when quantifying the GHG emissions associated with development projects undergoing environmental review. For purposes of the project's mobile source-related emissions estimates, CalEEMod® is designed to estimate operational, on-road mobile vehicle traffic generated by a project's land uses, and specifically accounts for the CO<sub>2</sub> emissions from running, start-up, and idling vehicles. Please see **Response to Comment No. 09-16** for additional relevant information.

**Comment No. IE15-4:**

- ▲ The promise of zero GHGs sounds good on paper but the enforcement reality is lacking:

**Response No. IE15-4:**

This comment states that the project's commitment to achieve net zero GHG emissions is lacking in enforcement. The comment does not provide any evidence to support this statement nor does the comment identify a specific deficiency in the AEA analysis.

The AEA analysis was subject to independent review and evaluation by two technical experts: Ascent Environmental, Inc., CDFW's consultant, and CARB. As memorialized in a letter from CARB to CDFW, dated November 3, 2016:

“[C]ARB staff consulted with Department of Fish and Wildlife staff and technical experts at Ascent Environmental, the principal consultant assisting the Department. In doing so, [C]ARB staff reviewed the technical documentation provided for the evaluation of the project's total estimated GHG emissions and the reductions in emissions to be achieved through the mitigation measures. Based on staff's review, [C]ARB finds the documentation provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.

CARB's finding that the project's GHG emission reduction calculations are documented by “an adequate technical basis” is part of the body of substantial evidence that supports the AEA's GHG emissions analysis, particularly as CARB is the state agency designated with the responsibility for and expertise to implement statewide policy on global climate change and the reduction of GHG emissions.

The GHG mitigation measures would be incorporated into a MMRP as required by CEQA. The County of Los Angeles would enforce the implementation of all mitigation measures in accordance with the MMRP. Mitigation Measures 2-1 through 2-13, which comprise the project's GHG emissions reduction obligations, would be incorporated into the project's MMRP and would be fully enforceable. For example:

- ▲ Mitigation Measures 2-1 and 2-2, which require submission of a ZNE Confirmation Report for residential and non-residential buildings and facilities that demonstrates that such buildings are designed and would be constructed to achieve ZNE, must be satisfied prior to the issuance of building permits by the County.
- ▲ Mitigation Measure 2-3, which requires submission of plans showing that all swimming pools in the project area have been designed and would be constructed to use solar water heating or other technology with an equivalent level of energy efficiency, must be satisfied prior to the issuance of building permits for private recreation centers by the County.

- ▲ Mitigation Measure 2-4, which requires submission of plans demonstrating that each residence in the project would be equipped with an EV charging station and requires establishment and funding of an account for provision of subsidies for EV purchases, must be satisfied prior to the issuance of residential building permits by the County.
- ▲ Mitigation Measure 2-5, which requires submission of plans demonstrating that parking areas for commercial buildings within the project are equipped with EV charging stations for 7.5 percent of the total number of required parking spaces, must be satisfied prior to the issuance of commercial building permits by the County.
- ▲ Mitigation Measure 2-6, which requires implementation of the project's TDM Plan, requires that the County make implementation of relevant elements of the TDM Plan conditions of approval when approving tentative subdivision maps for land developments that are part of the project.
- ▲ Mitigation Measure 2-7, which requires implementation of traffic signal coordination along several roads in the project vicinity, must be satisfied prior to the issuance of traffic signal permits by the County.
- ▲ Mitigation Measure 2-8, which requires funding for an electric school bus program within the project, requires incremental funding to be demonstrated to the County as the school bus program is paced to village-level occupancy and student enrollment levels.
- ▲ Mitigation Measure 2-9, which requires funding for electric transit bus program, must be satisfied incrementally, prior to the issuance of the 2,000th residential building permit for the project and prior to every 2,000th residential building permit thereafter, with the issuance of such residential building permits contingent upon compliance with the Mitigation Measure.
- ▲ Mitigation Measure 2-11, which requires funding for the Building Retrofit Program, makes the issuance of building permits for every 100 residential units or 100,000 square feet of commercial development for each village-level project contingent upon proof of funding of a proportional percentage of the Building Retrofit Program.
- ▲ Mitigation Measure 2-12, which requires proof of installation of off-site EV charging stations in Los Angeles County, makes the issuance of building permits contingent upon satisfactory proof of such installations.
- ▲ Mitigation Measures 2-10 and 2-13, which require the implementation of the GHG Reduction Plan, expressly require the retirement of GHG mitigation credits and/or carbon offsets *prior* to the issuance of a grading permit (for construction GHG emissions) or building permit (for 30-year project life GHG emissions), respectively. Specifically, under Mitigation Measure 2-10, prior to obtaining a grading permit, the project applicant must satisfy its mitigation obligation for all construction-related GHG emissions associated with the grading permit – which includes all construction-related and vegetation change GHG emissions from the start of grading through vertical construction – *before any grading begins*. Similarly, under Mitigation Measure 2-13, the project applicant must satisfy its mitigation obligation associated with the building permit – which includes all GHG emissions for the 30-year project life for the portion of the project covered by the building permit – *before building occupancy occurs*. Thus, mitigation compliance is completed before the activity in question begins and is enforced by Los Angeles County.

Please see **Responses to Comment Nos. 09-19, 09-24, 09-25, and 09-32** for detailed discussion of the implementation and enforcement of the mitigation measures related to ZNE standards, EV charging stations and subsidies, and the GHG Reduction Plan. As described above, all elements of the mitigation measures are fully enforceable under the MMRP and the AEA's conclusion that the project would result in net zero GHG emissions is supported by substantial evidence.

**Comment No. IE15-5:**

There are no safeguards to track the future offsets that will need to be bought;  
 Will the offsets actually exist to be bought? Will enough offsets be available?  
 Who will assure that the offsets are actually bought?  
 Who will assure that the offsets are actually effective to offset the amount of GHGs needed to be offset?

**Response No. IE15-5:**

This comment raises several questions regarding about the use of carbon offsets to mitigate the project's GHG emissions. The comment does not provide any evidence to support this statement nor does the comment identify a specific deficiency in the AEA analysis. The comment asks for clarity as to whether enough carbon offsets would be available for purchase, whether the requirement to purchase carbon offsets would be enforced, and whether the carbon offsets that are purchased would be effective to offset the GHG emissions that are required.

Please see **Response to Comment No. 09-32** for a detailed discussion of the use of direct reduction activities and carbon offsets to mitigate the project's emissions through the GHG Reduction Plan. **Response to Comment No. 09-32** provides a broad overview of the mitigation measures and the performance standards underpinning the GHG Reduction Plan which verifies that all GHG reductions used for compliance with Mitigation Measures 2-10 and 2-13 are consistent with CEQA Guidelines Section 15126.4(c)(3) and (c)(4) (allowing GHG mitigation by “[o]ff-site measures, including offsets that are not otherwise required” and “[m]easures that sequester GHGs”). The GHG Reduction Plan, through the implementation of Direct Reduction Activities and the purchase of Carbon Offsets meets the requirements of CEQA, as discussed in this Response and **Responses to Comment Nos. 09-33 through 09-62**.

As required by Mitigation Measure 2-13, the project applicant would primarily achieve GHG reductions through the implementation or funding of Direct Reduction Activities or, if necessary, by purchasing carbon offsets. Section VI of the GHG Reduction Plan identifies the three compliance options permitted by Mitigation Measure 2-13 (GHG emissions associated with a 30-year project life). Former Compliance Option No. 2 has been eliminated, which removes the option for the project applicant to provide a guarantee of compliance (see the revised GHG Reduction Plan in Final AEA Appendix 6, previously referred to as Appendix F of Draft AEA Appendix 1) Section VII of the GHG Reduction Plan identifies the two compliance options permitted by Mitigation Measure 2-10 (GHG emissions associated with project construction). Section VIII establishes the compliance confirmation process by the Approved Registry, with the Approved Registry providing retirement documentation in a form that can be provided by the project applicant to the County of Los Angeles to demonstrate compliance. The project applicant must also provide a written attestation from an Approved Registry to Los Angeles County where the attestation confirms that the retired GHG Mitigation Credits or Carbon Offsets satisfy the performance criteria established in Section IX of the GHG Reduction Plan. Mitigation Measures 2-10 and 2-13 are incorporated into the Mitigation Monitoring and Reporting Program, as enforced by Los Angeles County.

The timing requirements of Mitigation Measures 2-10 and 2-13 ensure the retirement of GHG mitigation credits and/or carbon offsets prior to issuance of a grading permit (for construction GHG emissions) or building permit (for 30-year project life GHG emissions), respectively. Retiring a GHG mitigation credit or carbon offset eliminates it from further use and avoids any double counting. A GHG mitigation credit or carbon offset cannot be retired until it is first issued by an Approved Registry in accordance with the Approved Registry's protocols for the activity in question, with the Approved Registry attestation noted above. Specifically, under Mitigation Measure 2-10, prior to obtaining a grading permit, the project applicant must satisfy its mitigation obligation for all construction-related GHG emissions associated with the grading permit – which includes all construction-related and vegetation change GHG emissions from the start of grading through vertical construction – before any grading begins. Similarly, under Mitigation Measure 2-13, the project applicant must satisfy its mitigation obligation associated with the building permit – which includes all GHG emissions for the 30-year project life for the portion of the project covered by the building permit – before building occupancy occurs. Thus, mitigation compliance is completed before the activity in question begins and is enforced by Los Angeles County.

As stated above, all GHG mitigation credits and carbon offsets must meet the performance standards in Section IX of the GHG Reduction Plan, as revised (see Final AEA Appendix 6). Among other standards, this requires a Direct Reduction Activity to meet additionality requirements and to be fully implemented and confirmed by an accredited, independent third party in accordance with approved methodologies from an Approved Registry.

As explained in **Response to Comment No. IE15-4**, compliance with Mitigation Measures 2-10 and 2-13 would be enforced by the County. As to the concern that there may not be an adequate supply of carbon offsets to purchase if needed for compliance with Mitigation Measures 2-10 and 2-13, please see **Response to Comment 09-40**. As explained therein, the project applicant would primarily reduce GHG emissions through Direct Reduction Activities. To the extent that the project applicant is required to purchase carbon offsets, an ample supply is and would be available. Tens of millions are currently available or being generated, and even if demand increases, it is reasonable to assume that market forces would spur the development of new offset projects.

As to the question of whether carbon offsets are effective at reducing GHG emissions, it is well established that carbon offsets can be used as CEQA mitigation. See CEQA Guidelines Section 15126.4(c)(3) and (c)(4). In promulgating the CEQA Guidelines for GHG mitigation, the California Natural Resources Agency (CNRA) and the Governor's Office of Planning and Research (OPR) addressed the legitimacy of offsets as follows:<sup>6</sup>

"The Initial Statement of Reasons...cites several sources discussing examples of offsets being used in a CEQA context. Further, the CARB Scoping Plan describes offsets as way to provide regulated entities a source of low-cost emission reductions, and ... encourage the spread of clean, efficient technology within and outside California. The Natural Resources Agency finds that the offset concept is consistent with the existing CEQA Guidelines' definition of 'mitigation,' which includes rectifying the impact by repairing, rehabilitating, or restoring the impacted environment and compensating for the impact by replacing or providing substitute resources or environments."

Moreover, under AB 900, the Jobs and Economic Improvement Through Environmental Leadership Act, certain CEQA streamlining benefits were provided to "environmental leadership" projects that met the conditions of the bill. One of the key conditions was that the project offset all of its emissions to be GHG neutral. (Pub. Resources Code, Section 21183(c).) The project applicant must submit to CARB documentation establishing that the project would not result in any net additional GHG emissions, and CARB then makes a determination on this issue for the Governor. To date, multiple projects have been designated as AB 900 leadership projects that have made a commitment to purchase GHG credits from the voluntary carbon marketplace to ensure carbon neutrality, including the Crossroads Hollywood Project (a mixed-use, residential and commercial project), Qualcomm Stadium Reconstruction Project, the Event Center and Mixed Use Development at Mission Bay Blocks, and 8150 Sunset Boulevard.<sup>7</sup>

In sum, the GHG Reduction Plan establishes a robust procedural framework and identifies specific performance standards to ensure the GHG reductions relied upon for compliance with Mitigation Measures 2-10 and 2-13 satisfy CEQA.

**Comment No. IE15-6:**

How will the use of electric cars be monitored and enforced in order to gauge if the touted GHG reductions actually occur?

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<sup>6</sup> California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of GHG Emissions Pursuant to SB97 (December 2009).

<sup>7</sup> Information on current AB 900 leadership projects is found at: Available at: [https://www.opr.ca.gov/s\\_californiajobs.php](https://www.opr.ca.gov/s_californiajobs.php).



**Response No. IE15-6:**

The comment requests information regarding how the use of electric cars would be monitored and enforced. As provided in Final AEA Appendix 2, which contains the project's MMRP, the implementation of the project's mitigation requirements would be overseen by the County of Los Angeles, which is the local agency with land use jurisdiction over the project site. Pursuant to the MMRP, implementation of Mitigation Measure 2-4 would be monitored by tracking the use of the ZEV purchase subsidies. Additionally, with respect to on-site charging equipment infrastructure required by Mitigation Measures 2-4 and 2-5, the MMRP requires the County to review and approve building design plans that provide for the installation of such infrastructure prior to the issuance of building permits for site development. Finally, for purposes of Mitigation Measure 2-12's requirement to install off-site charging equipment infrastructure, the MMRP requires the County to receive proof of the installation of such infrastructure prior to the issuance of building permits for site development at specified intervals. Each of the MMRP's monitoring parameters are designed and intended to ensure that the project provides the necessary ZEV purchase subsidies and on- and off-site charging equipment infrastructure that were relied upon in the GHG emission reduction calculations.

**Comment No. IE15-7:**

All these assurances need to be codified as enforceable mitigation measures.

**Response No. IE15-7:**

The comment states that all "assurances" relating to the mitigation measures "need to be codified." In response, and in accordance with the requirements of CEQA, any approvals issued by CDFW necessarily would be coupled with the adoption of a project-specific MMRP. The provisions of the MMRP that pertain to the environmental resource issues analyzed in this AEA are located in Final AEA Appendix 2.

**Comment No. IE15-8:**

The project is still too big and impactful to the Valley and flies in the face of 21<sup>st</sup> century smart planning – it needs to be significantly scaled back and away from the Santa Clara River

**Response No. IE15-8:**

The comment opines that the project is "too big," "flies in the face of 21<sup>st</sup> century smart planning," and needs to be "scaled back and away from the Santa Clara River." The comment does not address any particular aspect of the AEA and, therefore, no further response can be provided. Further, the comment appears to raise issues that are beyond the scope of the AEA, which – as discussed in **Topical Response 1: Scope of the Additional Environmental Analysis** – was delineated to be responsive to pertinent court decisions. Nonetheless, for informational purposes, the development that would be facilitated by approval of the project is designed to accommodate projected regional population and employment growth. Relatedly, approval of the project would facilitate the development of a master-planned community that accords to principles of sustainable design on a project site that has been slated for comparable development since the County of Los Angeles's 2003 approval of the Newhall Ranch Specific Plan. Finally, impacts to the Santa Clara River were comprehensively evaluated in the 2010 Final EIR, and the comment has identified no changed circumstances that would trigger a re-evaluation of such impacts.

**Comment No. IE15-9:**

- ▲ Where's the analysis of the methane that will be generated from trash created by this massive project, what about emissions from trash truck – the GHG analysis is not sufficient

**Response No. IE15-9:**

The comment asks whether the AEA's GHG emissions analysis accounts for the methane associated with solid waste disposal, as well as the GHG emissions associated with haul truck trips necessary to transport project-related solid waste. In response, the modeling platform (CalEEMod®) used in the AEA accounts for the "GHG emissions associated with the decomposition of the waste, which generates methane based on

the total amount of degradable organic carbon.” (See Draft AEA Appendix 1, pp. 14.) As such, the “Solid Waste Generation” inventory data presented in the pertinent tables of the AEA (e.g., Table 2.3-3) discloses the CH<sub>4</sub> emissions referenced in the comment.

Similarly, CalEEMod® bases its operational mobile source emissions estimates on a fleet mix developed by CARB, in conjunction with its EMFAC model, which contains heavy duty and diesel trucks.<sup>8</sup> These heavy-duty and diesel trucks generally are not associated with trips made by project residents or employees, and thus using these heavy-duty vehicle emission factors accounts for emissions from other vehicle trips, such as solid waste hauling trips. Relatedly, the trip generation rates used in the project’s traffic impact analysis were determined based on various sources, including an approved travel demand model (the Santa Clarita Valley Consolidated Traffic Model), and include all typical trip generation activities for a development of this type, including trash hauling trips. As such, the “Mobiles Sources” inventory data presented in the pertinent tables of the AEA (e.g., Table 2.3-3) discloses the GHG emissions created by the hauling of project-related solid waste.

**Comment No. IE15-10:**

- ▲ The severe water cutbacks required in the SCV in the last six years are new information showing that we cannot accommodate this massive project with our current water resources. That water table dropped 70 feet and several wells went dry.

**Response No. IE15-10:**

The comment states that “new information” shows that the project’s water demand cannot be met with “current resources.” CDFW does not concur.

First, please refer to **Topical Response 1: Scope of the Additional Environmental Analysis** regarding the scope of the AEA. As explained therein, the scope of the Supreme Court’s decision provides the basis for the issues addressed in the AEA. The Supreme Court decision does not require re-analysis of the project’s water supply impacts and, instead, limit the required re-analysis to two distinct issues – significance findings regarding GHG emissions and invalidation of two construction-related mitigation measures related to stickleback. Any comments regarding the adequacy of the 2010 Final EIR’s water supply analysis are beyond both the scope of the Supreme Court’s decision, and are barred by CEQA’s 30-day statute of limitations, which required that any such claims be brought within 30 days following the certification of 2010 Final EIR. (Pub. Resources Code, Section 21167, subd. (c); *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 479-480.)

Second, water supply impacts caused by drought conditions do not constitute significant new information as that term is defined under CEQA. (See, e.g., *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515 [upholding use of an addendum to an EIR rather than subsequent CEQA review because information regarding drought and climate change did not constitute new information that required preparation for a subsequent or supplemental EIR].)

Third, the previously certified 2010 Final EIR thoroughly evaluated water supply impacts. The prior EIR’s water supply/demand assessment also extensively addressed California’s drought conditions and its effect on state and local water supplies. For further information, please refer to Section 4.3, Water Resources, of the 2010 Final EIR. Based on the comment and the water supply impacts already assessed, CDFW has determined there are no identified substantial changes in the project or its circumstances that warrant any further review or analysis of the project’s water supply impacts.

<sup>8</sup> “Appendix A: Calculation Details for CalEEMod,” prepared for CAPCOA and prepared by ENVIRON International Corporation and California Air Districts (July 2013), p. 29, available at <http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixa.pdf?sfvrsn=2>. Accessed: February 17, 2017.

**Comment No. IE15-11:**

- ▲ There have been a lot of articles about how offsets are often a green washing scam. What guarantee do we have that the offsets being purchased as GHG mitigation will result in measurable, provable, reductions in GHG emissions beyond what would have otherwise occurred?

**Response No. IE15-11:**

This comment questions whether carbon offsets which may be purchased by the project applicant for compliance with Mitigation Measures 2-10 and 2-13 would result in measurable GHG reductions beyond what would have otherwise occurred. The comment does not provide any evidence to support this statement nor does the comment identify a specific deficiency in the AEA analysis.

Please see **Response to Comment Nos. IE15-5 and 09-32**. As discussed in **Response to Comment No. 09-32**, offset registries have developed a broad consensus around the standards that are necessary to ensure that offsets are environmentally sound, namely, that offsets be real, permanent, quantifiable, verifiable, enforceable, and additional, defined as follows:

- ▲ “Real”: offsets may only be issued for emissions reductions that are a result of complete emissions accounting.
- ▲ “Permanent”: projects must demonstrate that the emissions reductions that have occurred are permanent and would not be reversed. For example, in the context of forestry, offset project developers must demonstrate that the carbon sequestered in the trees of the forest would not be released to the atmosphere after the fact, i.e., that the trees will not be cut down.
- ▲ “Quantifiable”: projects must rigorously quantify the emissions reductions from a project, and may only receive credits in an amount corresponding to emissions that they have actually quantified. project developers must ensure the accuracy of their emissions accounting by adhering to standardized quantification methodologies called “protocols,” which are discussed further below.
- ▲ “Validated”: to receive offset credits, emission reductions must be well documented and transparent enough to be capable of objective review by a neutral, third party verifier.
- ▲ “Enforceable”: in order to be eligible to generate offset credits from reputable programs, the implementation of the offset project must represent the legally binding commitment of the offset project developer. Once the developer undertakes the project, the developer is under a legal obligation to carry it out.
- ▲ “Additional”: the GHG emissions reductions generated by a project must be “additional,” meaning that they are only eligible to generate offset credits if they would not have occurred without the offset project. project developers must ensure additionality by adhering to the applicable protocol, as discussed further below.

All carbon offsets used for compliance with the Mitigation Measures 2-10 and 2-13 shall be real, additional, quantifiable, permanent, verifiable, and enforceable, among other performance standards identified in the GHG Reduction Plan. The GHG Reduction Plan requires the project applicant to submit an attestation from an Approved Registry that the carbon offsets meet the performance standards identified in the GHG Reduction Plan prior to retiring and relying upon any carbon offsets. Further, all GHG mitigation credits used for compliance with Mitigation Measures 2-10 and 2-13 must meet the performance standards identified in the GHG Reduction Plan, including “additionality” requirements, as detailed in **Responses to Comments Nos. 09-32 and 09-36**.

In sum, the GHG Reduction Plan establishes a robust procedural framework and identifies specific performance standards to ensure the GHG reductions relied upon for compliance with Mitigation Measures 2-10 and 2-13 satisfy CEQA.

**Comment No. IE15-12:**

- ▲ Mitigation for GHG that is proposed to be bought as pollution credits in other countries is unenforceable and unverifiable. AND it will not help our local air pollution problems.

**Response No. IE15-12:**

This comment appears to rely on a premise that the project applicant would be purchasing carbon offsets generated in other countries. The comment does not provide any evidence to support this statement nor does the comment identify a specific deficiency in the AEA analysis.

Please see **Response to Comment Nos. IE15-5 and 09-32**. As discussed therein, the GHG Reduction Plan establishes a robust procedural framework and identifies specific performance standards to ensure the GHG reductions relied upon for compliance with Mitigation Measures 2-10 and 2-13 satisfy CEQA.

The comment appears to be referring to one of the proposed Direct Reduction Activities included in the GHG Reduction Plan, which involves investment in clean cookstoves in Africa. Please see **Response to Comment 09-53** for a detailed discussion of the clean cookstove projects. As explained therein, the project applicant has initiated a pilot program for installation of clean cookstoves in Zambia and has retained an independent, qualified third party to audit or “confirm” implementation of the Direct Reduction Activity on the ground and estimate the reduction of CO<sub>2</sub> emissions that would result from the cookstoves. This estimate would rely upon a quantification methodology adopted by an Approved Registry taking into account the expected life of cookstoves in the field and other factors. The independent, qualified third party would provide a technical report containing the results to the Approved Registry for its review and approval. Upon receipt of the technical report from the third party auditor, the Approved Registry would review the documentation and determine its compliance with the approved quantification methodology. If confirmed by the Approved Registry, the Approved Registry would confirm the issuance of the GHG Mitigation Credit.

As to enforceability, as explained above in **Response to Comment No. IE15-4**, compliance with Mitigation Measures 2-10 and 2-13 would be enforced by the County. Specifically, under Mitigation Measure 2-10, prior to obtaining a grading permit, the project applicant must satisfy its mitigation obligation for all construction-related GHG emissions associated with the grading permit, which includes all construction-related and vegetation change GHG emissions from the start of grading through vertical construction, before any grading begins. Similarly, under Mitigation Measure 2-13, the project applicant must satisfy its mitigation obligation associated with the building permit, which includes all GHG emissions for the 30-year project life for the portion of the project covered by the building permit, before building occupancy occurs. Thus, mitigation compliance is completed before the activity in question begins and is enforced by Los Angeles County.

Finally, the comment regarding local air pollution is beyond the scope of the AEA, and no further response is required. See **Topical Response 1: Scope of the Additional Environmental Analysis**.

**Comment No. IE15-13:**

- ▲ No mention or itemization of the external creators of GHG for this project, like methane from waste disposal, energy production for water delivery and desalination of waste water, off site energy production for infrastructure, auto and truck deliveries and other uses is not in the Environmental document because those chapters are excluded from the document. These issues must be discussed in order for the document to be valid.

**Response No. IE15-13:**

The comment states that various “external creators” of GHG emissions are not mentioned or itemized in the AEA. However, the AEA includes the indirect emissions (i.e., “external creators”) consistent with the methodological parameters established by CAPCOA and CalEEMod®. Specifically, for information regarding the AEA’s quantification of methane emissions associated with solid waste disposal, please see **Response to Comment No. IE15-9** above. As for emissions associated with the delivery of water and treatment of

wastewater, in accordance with the parameters of CalEEMod®, the AEA accounted for the “[i]ndirect GHG emissions [that] result from the production of electricity to convey, treat, and distribute the project’s water and wastewater.” (See Draft AEA, p. 2-19.)<sup>9</sup> As for off-site energy production, the AEA analysis includes estimates for off-site electricity production in accordance with CalEEMod®. (See Draft AEA, p. 2-17; Draft AEA Appendix 1, Section 2.1.3 and 2.3.2.) Finally, as for auto and truck deliveries, the AEA specifically accounted for “on-road mobile sources,” which are generated by “residents, workers, customers, and delivery vehicles visiting the land uses developed as part of the project.” (See Draft AEA, p. 2-18.) As described above, in **Response to Comment No. IE15-9**, the vehicle fleet used in CalEEMod® is based on CARB’s vehicle fleet parameters for its EMFAC model, and necessarily includes a mix of light-, medium-, and heavy-duty vehicles.

**Comment No. IE15-14:**

- ▲ Our Valley is already out of federal compliance for dust pollution (PM10 and PM<sub>2.5</sub>) that causes asthma and permanent lung damage and affects our children’s health. Filling the flood plain with 200 million cubic yards of dirt will substantially add to this pollution.

**Response No. IE15-14:**

The comment states that the project’s floodplain-related grading activities would substantially add to air pollution. Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains how the scope of this environmental analysis is pursuant to and consistent with the relevant 2015 decision issued by the California Supreme Court. As discussed at length in that response, the California Supreme Court’s 2015 decision only found fault with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords to the California Supreme Court’s decision. Therefore, this comment is outside the scope of the AEA and no further response is needed.

Further, the subject of air quality was previously studied and evaluated by CDFW in Section 4.7, Air Quality, of the project’s 2010 Final EIR. No legal challenge was brought against that analysis by the author of this comment or any other party. The comment does not identify any flaws or omissions with the prior air quality analysis that require additional considerations based on the AEA.

Finally, the comment offers no evidence that the changed circumstances criteria set forth in CEQA Guidelines Section 15162 have been met. There is no evidence that new impacts or substantially more severe impacts to air quality would occur because of the information and analysis presented in the AEA. To the contrary, it should be noted that many elements of the project’s mitigation framework for GHG emissions are anticipated to achieve co-benefits in the Southern California Air Basin due to corresponding emission reductions in criteria air pollutants.

**Comment No. IE15-15:**

- ▲ To protect the river water quality and the endangered fish, the project should be moved away from the Santa Clara River.

**Response No. IE15-15:**

The comment states that the project should be moved away from the Santa Clara River to protect the river’s water quality and endangered fish.

<sup>9</sup> See also “Appendix A: Calculation Details for CalEEMod,” prepared for CAPCOA and prepared by ENVIRON International Corporation and California Air Districts (July 2013), p. 33, available at <http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixa.pdf?sfvrsn=2>. Accessed: February 17, 2017.

As an initial matter, the comment does not raise any issue as to the adequacy of the AEA. In addition, the comment is vague as to what aspects of the Santa Clara River's water quality would be adversely affected by the project's planned location; nor does the comment explain how the project's planned location would affect endangered fish. Moreover, the AEA is focused exclusively on the project's GHG emissions and No Water Contact approach to constructing bridges and bank stabilization. (See **Topical Response 1: Scope of the Additional Environmental Analysis** for information regarding the AEA's scope.) Nothing in the comment indicates that either of these aspects of the project would affect water quality or endangered fish species.

Note also that the 2010 Final EIR analyzed, disclosed, and where necessary, recommended mitigation measures for the project's water quality impacts. That portion of the 2010 Final EIR has been upheld and is no longer subject to review or challenge. The 2010 Final EIR also analyzed the project's impacts on special status fish species. This analysis, too, was upheld as adequate, although two mitigation measures, BIO-44 and BIO-46, were deemed invalid due to conflicts with Fish and Game Code section 5515. As explained in the AEA, the No Water Contact approach to bridge construction was developed expressly to avoid impacts to sensitive fish species, including the unarmored threespine stickleback, and eliminate the need for Mitigation Measures BIO-44 and BIO-46. The AEA fully evaluates whether and to what extent the revised construction approach would affect the aquatic environment of the Santa Clara River. (See Draft AEA, pp. 3-1–3-40.) Finally, any effort to move the project would likely trigger additional environmental effects that would have to be evaluated. Given that the project's current location has been extensively analyzed in terms of impacts on water quality, biology, and virtually every other impact category, there is no need to require that the project be moved.

**Comment No. IE15-16:**

- ▲ Filling the floodplain with 200 million cubic yards of dirt hurts water replenishment and will massively add to dust pollution in the Santa Clarita Valley.

**Response No. IE15-16:**

The comment reiterates the issue regarding the intersection of floodplain-related grading activities and air quality previously addressed in **Response to Comment No. IE15-14**. As for water replenishment, like air quality, that issue is beyond the scope of the AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**). Further, to the extent that the commenter's use of "water replenishment" is referring to groundwater recharge, the subject of groundwater recharge was previously studied and evaluated by CDFW in Section 4.3, Water Resources, of the project's 2010 Final EIR. The comment does not identify any flaws or omissions with the prior analysis that require additional considerations based on the AEA. Finally, the comment offers no evidence that the changed circumstances criteria set forth in CEQA Guidelines Section 15162 have been met. There is no evidence that new impacts or substantially more severe impacts to groundwater recharge would occur because of the information and analysis presented in the AEA.

**Comment No. IE15-17:**

- ▲ There should be a .25 mile buffer around the spine flower preserves to protect this endangered flower. The proposed endowment is not sufficient to provide protection. We see what has happened in the valley oaks Savannah (SEA 64 -- no trails as promised, inadequate management to preserve the oaks, oaks dying)

**Response No. IE15-17:**

The comment states that there should be a quarter-mile buffer around the spineflower preserves to protect the state-listed endangered San Fernando Valley spineflower. The comment also contends that the current endowment for the spineflower preserve system is not sufficient to protect the species. The comment then cites the "valley oaks Savannah" SEA 64 as an example where a preserve was not properly funded resulting in "no trails as promised, inadequate management to preserve the oaks, oaks dying."

CDFW notes that the comment does not identify any deficiency in the AEA or its impact assessments. Nor does the comment address any substantive issue within the scope of the AEA, which is limited to the analysis of the project's GHG emissions and take avoidance of the unarmored threespine stickleback. Issues pertaining to San Fernando Valley spineflower fall outside this scope (see **Topical Response 1: Scope of Additional Environmental Analysis**); and the comment does not demonstrate any connection between (a) GHG emissions mitigation or the proposed take avoidance measures for stickleback, and (b) the spineflower preserves. CDFW adopted the SCP, and certified its attendant EIR, in December 2010. Both the SCP and the 2010 Final EIR's analysis of project-related impacts on spineflower survived legal challenge and were upheld by the courts. Consequently, they are no longer subject to further review. No additional response to this comment is required.

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**IE16. Letter from Don P. Mullally, dated January 18, 2017**


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**Comment No. IE16-1:**

Some species of southern California locally or statewide uncommon or rare. If they are observed on the property of the Newhall Ranch Project (EIR) (SCH No. 20000011025) by competent observers, studies of their frequency on the property should be made, before decisions are made. If too rare or important for other reasons, development should be disqualified.

**Response No. IE16-1:**

The comment states that some species in southern California are locally or statewide “uncommon or rare” and that if observed on the project site, studies of their frequency should be assessed before decisions are made, including decisions about disqualifying development. As an initial matter, the comment does not appear to address a specific issue currently under review in the Draft AEA, nor does the comment raise an issue over the adequacy of the environmental issues addressed in the AEA. The Draft AEA addresses two issues: (1) the EIR GHG emissions significance findings, and (2) construction modifications to bridges and bank stabilization in a manner that avoids all contact with the wetted channel of the Santa Clara River (i.e., the “No Water Contact” construction approach). The comment does not appear to address either of these issues, but instead is focused generally on development impacts to special-status species, a topic that received extensive analysis in the 2010 Final EIR.

In light of the general nature of the comment, the commenter is directed to the 2010 Final EIR, Section 4.5, Biological Resources, which evaluates all special-status species observed, or likely to be observed, on the project site. The section also describes the extensive wildlife surveys performed to identify the presence or absence of special-status species on or in the vicinity of the project site. Section 4.5, Biological Resources, also incorporates extensive avoidance, minimization, and mitigation measures with regard to special-status species.

**Comment No. IE16-2:**

Scarce species of some noteworthy birds:

- a. Golden eagle: Mating pair noted on cliffs and ledges one mile southeast of Mentryville, circa five years ago. Don Mullally and Henry Shultz (deceased).
- b. Prairie falcon: Breeding pairs noted for twenty years on huge tall cobblestone turrets 1 ½ miles north of the Santa Clarita River and this distance from Aqua Dulce Canyon Road. By Don Mullally.
- c. Peregrine falcon: Breeding pairs on ledges of sandstone rock in the Simi Hills west and southwest of Chatsworth, California 1952-post 2010. Location still in use. Possibly ongoing. Known to falconers and Don Mullally. This species also seen in the Santa Susana Mountains. Richard Greene, Landscaping business in Santa Clarita, has watched a pair of Peregrines perch and feed on a tall steel power line pole, located at Dalby and Orchard Village Road in Santa Clarita for five years. Greene has collected the wings of birds eaten by these falcons on the pole: seagulls, ducks, and pigeons. Each year the hawks depart in March and return in early fall season.
- d. Northern Harrier: Noted many times flying over low brush, weeds and grasses in the wash of the Santa Clarita River. By Don Mullally
- e. Common Ground Dove: Noted in O’Melveny Park (groups of this doves) on ground in sagebrush, 1991. By Don Mullally.
- f. California Condor: seen by birdwatchers, nature lovers, and oil well employees on Oat Mountain from years past decades to about 1900. Also observed within the total area of the Santa Susana Mountains, Simi Hills, and in the Condor Preserve of the Topa Topa Mountains north of Piru, CA.
- g. Western tanager: observed in the spring and summer of 1949-1951 in woodlands located at the entrance to Elsmere Canyon beside State Highway 14. Observer: Don Mullally.
- h. Southern Spotted owl: Seen and heard by members of the Audubon Club of San Fernando Valley, 1988-1990s; oak woodlands and forests on the north slopes of the Santa Susana Mountains and O’Melveny City Park, northern San Fernando Valley, L.A.



- i. A single Burrowing Owl: Found during year 2000, killed on the road in front of O'Melveny City Park located in the Santa Susana Mountains. Bird found by Don Mullally, park employee.
- j. Long-eared owl: Observed in woodland in Rice Canyon, on an oak limb, perched ten feet above the ground (1985). By Don Mullally. Mullally also observed a juvenile Long-eared owl during midday within the grapefruit orchard of O'Melveny Park. (1991)

#### **Response No. IE16-2:**

The comment identifies “[s]carce species of some noteworthy birds,” including golden eagle, prairie falcon, peregrine falcon, northern harrier, and other special status bird species. As an initial matter, the comment does not address an issue currently under review in the Draft AEA, nor does the comment raise an issue over the adequacy of the environmental issues addressed in the AEA. The Draft AEA addresses two issues: (1) the EIR’s GHG emissions significance findings, and (2) construction modifications to bridges and bank stabilization in a manner that avoids all contact with the wetted channel of the Santa Clara River (i.e., the “No Water Contact” construction approach). The comment does not appear to address either of these issues, but instead is focused on identifying special-status bird species, a topic that received extensive analysis in the 2010 Final EIR.

In light of the general nature of the comment, the commenter is directed to the 2010 Final EIR, Section 4.5, Biological Resources, which evaluates all special-status bird species observed, or likely to be observed, on the project site. The section also describes the extensive wildlife surveys performed to identify the presence or absence of special-status bird species on or in the vicinity of the project site. Section 4.5, Biological Resources, also incorporates extensive avoidance, minimization, and mitigation measures with regard to special-status bird species. (See 2010 Final EIR, Section 4.5, Biological Resources, pp. 4.5-703 through 4.5-712 [Peregrine falcon]; pp. 4.5-713 through 4.5-725 [California condor]; pp. 4.5-727 through 4.5-744 [golden eagle]; pp. 4.5-1070 through 4.5-1088 [long-eared owl]; pp. 4.5-1089 through [northern harrier]; pp. 4.5-1119 through 4.5-1133 [burrowing owl]; and pp. 4.5-1134 through 4.5-1142 [summer tanager].)

#### **Comment No. IE16-3:**

##### **MAMMAL ISSUES**

**Mountain lion:** Commonly observed, also trapped by rangers for attaching animal location devices and cameras, capturing animals for treatment of sicknesses and injuries, and retrieving the carcasses of dead animals. For decades, cougars have been living as wild animals in the Santa Barbara-Topa Topa Mountains, Santa Susana Mountains, Santa Monica Mountains, and Simi Hills. In the Simi Hills, Santa Susana and Santa Monica Mountains, Rangers with the United States National Park Service have used electronic devices to locate lions, their territories and their dens. Data indicates mountain lions hunt, den, and breed throughout the Santa Susana Mountains from East Canyon to the Ventura County border. Also, in the Santa Monica Mountain Conservancy areas and Santa Monica Mountains National Recreational Area.

**Black Bears:** Observed multiple times as single adults and as parents with cubs in open spaces and parklands of the Santa Susana Mountains. Specifically in Ed Davis Park in Towsley Canyon, East, Wiley, Rice, and Towsley Canyons; and Knollwood Country Club in Granada Hills, CA (several). Also, one located north of Moorpark and Simi Valley in a large mountain park owned and operated by the Santa Monica Mountains Conservancy. The bear living in that park perished in a wildfire. The park extends to the crest of the Santa Susana Mountains and is located within 2-3 miles of the Newhall Land and Farm Development Project Plan. Project 00196 (5)). Two dead adult bears have been found on U.S. Hwy 5 beside the Santa Clarita Woodlands Open Spaces.

**Badger:** A dead badger was found on Highway 118 in Chatsworth, CA during 1985. Sheep and cattle ranchers of former times are suspected of killing badgers. During the 1870-1885 period ranchers of farm and ranch animals in Santa Clarita Valley waged war against all meat eaters. Badgers were probably killed. Information regarding badgers in the rougher parts of Santa Susana Mountains is not available.

**Long-tailed weasel:** Between 1980 and 1993 weasels were common near the entrance to O'Melveny City Park and in the northwestern end of adjacent Bee Canyon Park. Weasels were personally noted in weedy

grasslands having some water, artificial savanna type park and open coastal-sage scrub on gently sloping hillsides. The animals had and used burrows. They finally disappeared from view for unknown reasons. Possibly rabies or dogs. The weasels were tolerant of people in parks. A few have been observed in wilderness savanna locations in the distant locations of Santa Susanna Mountains.

Black-tailed Jackrabbit: The author has never observed or been informed about the presence of jackrabbits occurring in the Santa Susana Mountains east of Mentryville. According to the maintenance man of Mentryville, Audubon Cottontails are common in his park but jackrabbits are very scarce. Total absence of jackrabbits is also true in O'Melveny Park, Ed Davis Park, and other open spaces in Towsley, East, and other adjacent canyons.

Two jackrabbits were observed several years ago on the grounds of the Newhall Land and Farm Development Project. They were encountered approximately on the higher inland border of the riparian zone of the Santa Clara River. They were easily frightened away by the author.

Jackrabbits were common in Sagebrush Coastal sage scrub community north of the 118 Hwy and north and a bit east of the Ronald Reagan Library. The sagebrush present is *Artemisia Californica*. Other local jackrabbit country during the 1940-1955 period of time was the east side of Pacoima Canyon in dry creek and wash, San Fernando, CA. Friends and I hunted in the location. Our old hunting ground has been developed into a part of suburbia - more houses.

Jackrabbits are presently rare in all the open spaces of coastal greater Los Angeles. In fact, practically extinct in that region. As a student at UCLA, I saw some of the last ones wild on the golf course of the Beverly Hills Country Club. I flew a Red-tailed hawk after them. A late local spot for a few local jackrabbits used to be the underdeveloped acres and sides of Hwy 126 between Filmore and Santa Paula. So I was told by Richard Greene of Santa Clarita, 1-661-400-1222.

**Response No. IE16-3:**

The comment identifies mammals, including mountain lion, black bear, badger, long-tailed weasel, and black-tailed jackrabbit. As an initial matter, the comment does not address an issue currently under review in the Draft AEA, nor does the comment raise an issue over the adequacy of the environmental issues addressed in the AEA. The Draft AEA addresses two issues: (1) the EIR's GHG emissions significance findings, and (2) construction modifications to bridges and bank stabilization in a manner that avoids all contact with the wetted channel of the Santa Clara River (i.e., the "No Water Contact" construction approach). The comment does not appear to address either of these issues, but instead is focused on identifying special-status wildlife species, a topic that received extensive analysis in the 2010 Final EIR.

In light of the general nature of the comment, the commenter is directed to the 2010 Final EIR, Section 4.5, Biological Resources, which evaluates all special-status wildlife species observed, or likely to be observed, on the project site. The section also describes the extensive wildlife surveys performed to identify the presence or absence of special-status wildlife species on or in the vicinity of the project site. Section 4.5, Biological Resources, also incorporates extensive avoidance, minimization, and mitigation measures with regard to special-status wildlife species. (See 2010 Final EIR, Section 4.5, Biological Resources, pp. 4.5-703 through 4.5-712 [Peregrine falcon]; pp. 4.5-713 through 4.5-725 [California condor]; pp. 4.5-727 through 4.5-744 [golden eagle]; pp. 4.5-1070 through 4.5-1088 [long-eared owl]; pp. 4.5-1089 through [northern harrier]; pp. 4.5-1119 through 4.5-1133 [burrowing owl]; and pp. 4.5-1134 through 4.5-1142 [summer tanager].)

**Comment No. IE16-4:**

**FISH ISSUES**

A naturally developing, functioning and undamaged Santa Clara River and wash adjacent to the location of the Newhall Ranch Development Project, Mission Village, Landmark Village and other equivalent Newhall Villages is indicative of planning and a project which attempt to create a suburban city or a large town on

land beside the only natural, functioning, and undamaged river and large wash remaining in the greater Los Angeles region is faulty at best and practically criminal at worst.

**Response No. IE16-4:**

The comment states that placement of the project adjacent to the Santa Clara River, which the commenter describes as the “only natural, functioning, and undamaged river and large wash remaining in Los Angeles County, is “faulty at best and practically criminal at worst.”

The comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the nature of the comment, no further response is required.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and would not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

**Comment No. IE16-5:**

A successful project and its aftermath would soon eliminate surviving local populations of Southern Steelhead Rainbow trout and many other native species of wildlife. Considering global climate change and warming, perhaps eliminate the few fish of this type remaining in southern California.

**Response No. IE16-5:**

The comment states that the project “and its aftermath would soon eliminate surviving local populations of Southern Steelhead rainbow trout and many other native species of wildlife.” The comment then indicates that the project, in combination with global climate change, could eliminate all Southern steelhead in Southern California.

The comment’s general reference to global climate change is noted, and the Draft AEA evaluates the project’s GHG emissions and the commitment to reducing such emissions to net zero. Accordingly, the project would significantly contribute to the reduction in global climate change emissions. The comment does not address any other issue addressed in the Draft AEA and, thus, is beyond the scope of the AEA currently under review (see **Topical Response 1: Scope of Additional Environmental Analysis**). Instead, the comment focuses on the project’s specific and cumulative impacts on Southern steelhead. CDFW analyzed this issue extensively in the 2010 Final EIR. (See 2010 Final EIR, Section 4.5.5.5, pp. 4.5-661–678.) In addition, the Court of Appeal upheld this analysis. (*CBD v. CDFW* [2016] Cal.App.5th 452, 469.) As a result, it is no longer subject to legal challenge or further administrative review.

**Comment No. IE16-6:**

Urban water and pollution tend to flow downhill into rivers and oceans. The villages and most developments of the Project would most likely damage the Santa Clara river and its adjacent wash.

**Response No. IE16-6:**

The comment states generally that “[u]rban water and pollution tend to flow downhill into rivers and oceans,” and that “villages and most development of the project would most likely damage the Santa Clara River and its adjacent wash.”

The comment does not appear to address an issue covered in the Draft AEA and thus is beyond the scope of the document currently under review. Instead, the comment focuses on the project’s potential to adversely affect water quality in the Santa Clara River. The 2010 Final EIR provides an extensive analysis of the

project's impacts on water quality. (See 2010 Final EIR, Section 4.4, pp. 4.4-1 through 4.4-197.) That analysis was not challenged in litigation resulting in the preparation of the Draft AEA (*CBD v. CDFW, et al.*) and is no longer subject to administrative or judicial review. To the extent the comment can be construed to address water quality impacts caused by the "No Water Contact" approach to constructing bridges and bank stabilization features, the Draft AEA analyzes those impacts in Section 3, Unarmored Threespine Stickleback.

**Comment No. IE16-7:**

Damages and unwanted alterations are anticipated at bridges and other river crossings, locations between them, and parts of the Santa Clara River and its wash located upstream and downstream from the proposed villages of the full Project once is concluded 00-196 (57).

**Response No. IE16-7:**

The comment states generally that the project's proposed bridges and other river crossings would damage the Santa Clara River "and its adjacent wash located upstream and downstream of the proposed villages of the full [p]roject."

As an initial matter, the project's Santa Clara River corridor covers the entire river reach within the project site and is part of the land to be dedicated as permanent and funded open space. The only facilities within this area consist primarily of two essential permanent bridge crossings, temporary bridge crossings during construction, and bank stabilization, the impacts of which were fully evaluated in the 2010 Final EIR.

The comment does not describe how the project's proposed bridge crossings would damage the Santa Clara River or any other area "upstream and downstream" of the project site. The comment also does not identify any defect or inadequacy with regard to the environmental issues addressed in the Draft AEA. Moreover, as the Draft AEA explains, the proposed "No Water Contact" approach to bridge construction would reduce impacts to the river to less-than-significant levels. In light of the general nature of the comment, no further response can be provided or is required.

**Comment No. IE16-8:**

Between 1947-1957, the author observed a few large trout in lower Sespe Creek near Filmore, CA.

During the spring season of 1973 several school teachers and myself hiked down Sespe Creek from the campground and hot spring location beside upper Sespe Creek. We hiked downstream to a very large deep pond located in the middle of Sespe Gorge. The heads of (12-15) butchered trout had been scattered about by fishermen. Steelhead, presumably.

Perhaps Steelhead or at least Rainbow trout continue to migrate up Sespe Creek during the wet rain season. If so, fish of this species also may be migrating up the main course of the Santa Clara River to the location of the proposed Newhall Ranch Project and beyond to the entrance of Piru Creek and still further to the gorge of the Santa Clara River also named Soledad Canyon Gorge. It's located on the north side of the San Gabriel Mountains.

At a location on the Santa Clara River chosen by the Department of Fish and Wildlife, trout migrating north could be trapped in the river, selected or treated for sickness, then transported by truck to creeks deemed suitable for sustaining healthy, breeding trout. Good conditions include clean water without pollution, water is sufficient quantity, sufficiently cool water, large and deep pools, ledges furnishing shelter, relatively deep spots in creeks, and in occasional places having permanent water.

Suitable locations for trapping steelheads may be in the vicinity of Piru and the vicinity of Castaic Junction.

**Response No. IE16-8:**

The comment provides general information about the commenter's past observations of rainbow trout, including possibly steelhead, in Sespe Creek, situated in Ventura County. The comment also states that such fish may migrate from Sespe Creek into the main stem of the Santa Clara River. The comment suggests that CDFW could trap such fish, treat them for sickness, and then transport them "by truck to creeks deemed suitable for sustaining healthy, breeding trout."

The comment does not address any issue addressed in the environmental analysis contained in the Draft AEA. Nor does the comment raise any issue as to the adequacy of the Draft AEA. Further, the project does not propose the trapping or transport of trout or any other fish species. Because the comments raise issues beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**), no further response is required.

**Comment No. IE16-9:**

Suggested by the author is a list of creeks connected to the Santa Clara River which are thought to have contained trout before the Europeans conquests of America and the usages and development of the land.

Santa Clarita River upriver to the lower, southern parts of Acton. Potentially functional to the ocean.

A tributary leading from the Santa Clara River to mid elevations on Mt. Gleason's western slope.

Placerita Canyon Creek is isolated by a freeway and engineered wash.

Towsley and Rice Canyon Creeks are isolated by development in the Santa Clarita Valley .

Bouquet Canyon Creek, flowing from Bouquet Reservoir down to Mint Canyon into the Santa Clara River.

San Francisquito Canyon Creek: enters the Santa Clara Creek near Castaic Junction flows north through a development and it may continue to harbor red-legged frogs.

Upper Piru Creek flows into Pyramid Reservoir from the northwest, draining the north facing slopes of the Topa Topa Mountains and other mountains located further to the west.

Trout in Piru Creek are stopped by Pyramid Dam from flowing down from and into Piru Creek located at Frenchman Flat.

Piru Creek flows downward through the Piru Gorge into Piru Lake, and visa-versa.

Trout swim from the Santa Clara River into Piru Creek and into Piru Lake.

Fish Creek, an undependable tributary of Cienaga Creek which flows into the Castaic Reservoir.

Gavin Canyon, the route of U. S. Hwy. 5 extends from the head of Newhall Pass down to the low ends of East, Rice, and Towsley Canyons before flowing north to flow into the Santa Clara River. Before being engineered out of existence, Gavin Canyon Creek gathered much water during wet years and seasons and carried it down to the Santa Clara River.

**Response No. IE16-9:**

The comment provides a list of creeks and streams which, according to the commenter, at one time supported populations of trout. However, the comment does not address any issue addressed in the Draft AEA. Nor does the comment raise any issue as to the adequacy of the Draft AEA. Because the comments raise issues beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**), no further response is required.

**Comment No. IE16-10:**

**SUGGESTED BROAD COMMENTS & ISSUES**

Large River Washes: The wash of the Santa Clara River located between Acton, CA and Oxnard is unique in carrying a natural and practically undammed river which has not had its bottom encased in concrete and has not been captured by a huge dam before reaching the ocean.

All of the benefits of a combined system of river and wash are intact. Cities and towns have been placed sufficiently far from the Santa Clara River to avoid destroying the biological and scenic aspects of the river for the entire width of the wash.

**Response No. IE16-10:**

The comment describes generally the Santa Clara River as “unique” in that its bottom is not “encased in concrete” and the river itself “has not been captured by a huge dam before reaching the ocean.” The comment also states that the “benefits of a combine system of river and wash are intact, and that cities and towns “have been placed sufficiently far from the Santa Clara River to avoid destroying the biological and scenic aspects of the river for the entire width of the wash.”

As an initial matter, the project’s Santa Clara River corridor covers the entire river reach within the project site and is part of the land to be dedicated as permanent and funded open space. The only facilities within this area consist primarily of two essential permanent bridge crossings, temporary bridge crossings during construction, and bank stabilization, the impacts of which were fully evaluated in the 2010 Final EIR. Second, the comment does not address any issue addressed in the Draft AEA. Nor does the comment raise any issue as to the adequacy of the Draft AEA. Because the comments raise issues beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**), no further response is required.

**Comment No. IE16-11:**

The Newhall Ranch Project apparently threatens to destroy all or most of riparian environments existing on land and in wet shallows beside the river bed and channel.

**Response No. IE16-11:**

The comment states generally that the project “apparently threatens to destroy all or most of riparian environments existing on land and in wet shallows beside the river bed and channel.”

The comment does not explain how the project threatens riparian environments. Nor does the comment make any connection between the “No Water Contact” approach to bridge construction and the alleged destruction of the riparian environment and the “wet shallows beside the river bed and channel.” As the Draft AEA explains, the fundamental purpose of the “No Water Contact” construction approach is to avoid or reduce to less-than-significant levels the project’s impacts on the wetted channel of the Santa Clara River. (See Draft AEA, Section 3, Unarmored Threespine Stickleback, pp. 3-1 through 3-40.) To the extent that the comment focuses on the project’s overall impacts on riparian environments, including the “wetted shallows beside the river bed and channel,” the 2010 Final EIR analyzed those effects fully in Section 4.2, Geomorphology and Riparian Resources; Section 4.5, Biological Resources; and Section 4.6, Jurisdictional Waters and Streams. Such impacts, unless linked to the proposed “No Water Contact” approach to bridge and bank stabilization construction, are beyond the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). In addition, the majority of the project’s bank stabilization is setback from riparian areas, a fact extensively addressed in the 2010 Final EIR. No further response is required.

**Comment No. IE16-12:**

Raptorial birds (hawks and owls) nest in the privacy of riparian woodlands. Such species include the Cooper, Red shoulder, Red-tail, and Sparrow hawks. Owl species nesting in riverside woodlands include Horned, Barn, and Long-eared owls.

Fly-catchers, warblers, vireos, bluebirds, woodpeckers, and other species are also prone to feed, live, and reproduce in such woodlands.

**Response No. IE16-12:**

The comment makes general reference to numerous bird species nesting in riparian woodlands. Bird species and their habitat were extensively analyzed in the 2010 Final EIR (see Section 4.2, Geomorphology and Riparian Resources; Section 4.5, Biological Resources; and Section 4.6, Jurisdictional Waters and Streams). The comment also does not address any issue addressed in the Draft AEA. Nor does the comment raise any issue as to the adequacy of the Draft AEA. Because the comments raise issues beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**), no further response is required.

**Comment No. IE16-13:**

The Newhall Ranch Project planned to be composed of 21,000 units (homes, retail businesses, and other businesses) slated to form huge, long and wide man-made environments devoid of wildlife because of shortages of native plant and animal food, and natural habitats; presence of house cats, autos, traffic, congestion; and a large population of people, urban, and suburban features.

**Response No. IE16-13:**

The comment expresses concern over project development impacts. The comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). The comment also raises issues that were fully evaluated in the 2010 Final EIR (see Section 4.5, Biological Resources). This comment is noted for the record and is included in this Final EIR for review and consideration by the decision-makers. In light of the general nature of the comment, no further response is required.

**Comment No. IE16-14:**

The gap in the natural environment caused by development can be accentuated by high levels of suburban noise, and extremely high levels of artificial light.

**Response No. IE16-14:**

The comment refers to a “gap” in the natural environment caused by development, including an increase in noise and light. In doing so, the comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). The comment also raises issues that were fully evaluated in 2010 Final EIR (see Section 4.5, Biological Resources, and Section 4.5, Noise). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the comment, no further response is required.

**Comment No. IE16-15:**

Open spaces rarely have equal environmental value: Four important values are clean water, riparian zone, significant ecological areas, wildlife corridors. The Newhall Ranch Project has all four: plus adequate rainfall and valuable soil.

**Response No. IE16-15:**

The comment addresses environmental values and states that the project site has those values. In doing so, the comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). The comment also raises issues that were fully evaluated in 2010 Final EIR (see Section 4.4, Water Quality; 4.5, Biological Resources; and 4.6, Jurisdictional Waters and Streams). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the comment, no further response is required.

**Comment No. IE16-16:**

As a result, gently sloping soils bordering the Santa Clara River from the City of Santa Clarita to Oxnard and Ventura have prospered from agriculture for many decades. Once created, a planned Newhall Ranch development will seriously diminish yields from agriculture.

**Response No. IE16-16:**

The comment addresses agriculture and project development “diminishing” agricultural “yield.” In doing so, the comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). The comment also raises issues that were fully evaluated in the 2010 Final EIR (see Section 4.12, Agricultural Resources). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the comment, no further response is required.

**Comment No. IE16-17:**

A single large new development such as the Newhall Ranch Project on a side of a river usually leads to the construction of other new cities or towns spreading in all directions from the first development. Open spaces and agriculture will lose size in acreage importance and value.

**Response No. IE16-17:**

The comment expresses the view that project development in proximity to the Santa Clara River would usually leads to other development and the loss of open space and agriculture. In doing so, the comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). The comment also raises issues that were fully evaluated in the 2010 Final EIR (see Section 4.5, Biological Resources, and Section 4.12, Agricultural Resources). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the comment, no further response is required.

**Comment No. IE16-18:**

If the Newhall Ranch AEA Project area is situated in the local County of Los Angeles Significant Ecological Area (SEA), the project should be discontinued. The SEA should continue to be in place on the identical parcel of land it occupied before the planning phase of the Newhall Ranch Project and the AEA. SEAs should remain pristine and environmentally natural. They do special kinds of environmental work.

**Response No. IE16-18:**

The comment expresses the view that if the project area is situated in the County of Los Angeles SEA, it should be discontinued. The comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). The comment also raises issues that were fully evaluated in not only the County’s 2003 certified EIR and additional analysis for the Specific Plan, but also the 2010 Final EIR (see Section 4.5, Biological Resources). (The County specifically addressed the project’s consistency the County’s SEA in its Final Additional Analysis, which is incorporated by reference and available for public review and inspection upon request to the County Department of Regional Planning in Los Angeles County.)

This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the comment, no further response is required.

**Comment No. IE16-19:**

No buildings should be erected on the Newhall Ranch Project described in the area of its AEA until the project has acquired all government permits necessary for development.



**Response No. IE16-19:**

The comment expresses the view that no buildings should be erected within the project site until it acquires all government permits necessary for development. The comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the opinion expressed in the comment, no further response is required.

**Comment No. IE16-20:**

If the Newhall Ranch Project plans are approved by government before development, the owners of the development should agree to incorporate the new devices of science and technology into the buildings and businesses of the Newhall Ranch Project development. The new suburbia should not be permitted to allow old, decadent and unprofitable buildings of the development detract from town appearances and profit making by its residents and owners.

**Response No. IE16-20:**

The comment expresses the view that if the project is approved, the owners should incorporate new devices of science and technology into the development and avoid “old, decadent and unprofitable buildings” that detract. The comment expresses the opinion of the commenter, but does not raise an issue within the scope of the Draft AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). Further, if the comment is addressing techniques used by the project applicant to reduce GHG emissions to net zero, the Draft AEA identifies an array of state-of-the art mitigation reduction measures to be employed as part of the project, such as zero net energy homes and commercial buildings, onsite and offsite EV chargers, solar panels, and other innovative technologies to achieve net zero GHG emissions at the planned community level. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the opinion expressed in the comment, no further response is required.

**Comment No. IE16-21:**

Problems possibly stemming from problems including rising levels of CO<sub>2</sub>, CO, NO<sub>2</sub> gas, SO<sub>4</sub> gases, hydrocarbon gases, ozone and particulates in the air have not been adequately considered for the Newhall Project AEA.

**Response No. IE16-21:**

The comment states that problems stemming from rising levels of GHG and other gases and particulates were not adequately considered in the Draft AEA. The comment expresses the general opinion of the commenter, but does not provide any support for the statement. In light of the general nature of the comment, the commenter is directed to the 2010 Final EIR, Section 4.7, Air Quality, and the Draft AEA (November 2016), which provides a complete discussion and analysis of the project’s GHG emissions and commitment to reducing such emissions to net zero. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the opinion expressed in the comment, no further response is required.

**Comment No. IE16-22:**

Other land use methods have probably not received adequate study: changes in zoning, fuel cell energy firms, solar cell energy firms, wind based energy firms, home gardens on land located beside homes, outdoor lights not permitted to be switched on during nighttime hours, etc.

**Response No. IE16-22:**

The comment states that other land use methods “have probably not” received adequate study and provides examples. The comment expresses the general opinion of the commenter, but does not provide any support

for the statement. In light of the general nature of the comment, the commenter is directed to the Draft AEA, which provides a complete discussion and analysis of the project's GHG emissions and commitment to reducing such emissions to net zero. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. In light of the general nature of the opinion expressed in the comment, no further response is required.

**Comment No. IE16-23:**

Background Qualifications

Don Patrick Mullally graduated from the Hollywood High School and University of California in Los Angeles. At UCLA he majored in Vertebrate Zoology and Ecology. By 1952 he had published ten papers concerning Amphibians, lizards, and one on a species of ground squirrel.

After two years in the Army, his first professional job was being Curator of the San Mateo Museum. His second job was Science teacher, high school level, for twenty years. Concurrently he was California State Park Seasonal Naturalist for eight summers in Northern California; five different state parks.

Next employment was with the City Park Department of Los Angeles. While employed by the department, 1980-1992, he became the site manager of O'Melveny City Park.

Before and after retiring, Mullally engaged in volunteer preservation of nature, conservation, and creating wilderness parks. He became the father of the Santa Clarita Woodlands Preserve, 8,400 acres in size, located in the Santa Susana Mountains on the south side of Santa Clarita; formed between 1988-2000. During the 1990s Mullally was also instrumental in causing the creation of 800 acres of public recreation land and nature preserve on Green Creek in the subalpine zone of the eastern Sierra Nevada Mountains. The location is east of Yosemite National Park and west of Bridgeport, CA. The California Dept. of Fish and Game acquired the land from a rancher about to sell-out to a developer.

The author has spent less time on all his other environmental interests and projects than he has working against ongoing attempts to ruin Open Space and create a large town between Gorman plus US Hwy 5 and Neenach plus Hwy 138. Caught between these locations is Quail Lake and Mother Nature giving us some of her best.

The Tejon Ranch Corporation and professional business associates have for many years attempted to gain government permits necessary for developing the land. The projects name is Centennial.

My goal has been to preserve the plants, animals, scenic qualities, habitats, and aspects of terrain and geology from destruction by land development.

The Centennial Project encompasses land around the towns of Gorman, Neenach, Quail Lake, and Hwy 138. U. S. Hwy 5 is apparently the western boundary of the project.

Present on the land of the Centennial Project during spring months are magnificent fields of wild flowers; particularly on the south facing slopes of hills such as those north of Gorman Post Road.

Also present are several species of large oaks, scattered Joshua trees, California junipers, stands of rare native bunchgrasses. Dr. Todd Keeler Wolfe and I examined some of the stands before sheep were allowed to feed on and damage the stands.

The very evident San Andreas Fault is located on the south side of the Gorman Post Road. Many large sag ponds occur on the fault. Ducks and other water birds inhabit and depend upon these ponds. During summers, many white egrets feed on insects in the grassy fields around sag ponds.

From March through May motorists traveling north on U S Hwy 5 stop on the side of the road near Gorman to appreciate and photograph the wild flower-covered mountain sides north of Gorman and Gorman Post Road. However, most motorists take an off-ramp into Gorman, park on the Post Road, and take pictures or hike up the flowery canyons.

The good news is after many years of trying to obtain the permits necessary to develop the Centennial Project, efforts have failed. This spring will be a beautiful one.

Government decision makers of land-use of open spaces are accustomed to seeking information concerning citizens who provide issues or opinions to their offices: the goal being to identify individuals well educated and experienced in subjects relevant to uses of land involving development in the near future.

Therefore, information possibly useful personal background information has been submitted to departments and agencies concerned with EIRs, plans for developments, decision making, fact finding, etc.

**Response No. IE16-23:**

The comment outlines the commenter's background qualifications, which have been considered by CDFW. Because this background does not address an environmental issue over the adequacy of the Draft AEA, no further response is required.

## **IE17. Letter from John Paladin, dated February 13, 2017**

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### **Comment No. IE17-1:**

I am opposed to the Newhall Ranch phases 2 and 3 in their current size.

### **Response No. IE17-1:**

The comment expresses general opposition to Newhall Ranch phases 2 and 3 based on their current size. Based on the subject line of this letter, Newhall Ranch phases 2 and 3 are the Mission Village and Landmark Village projects, which are located within the RDMP/SCP project area. The comment does not raise any issue concerning the adequacy of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

### **Comment No. IE17-2:**

The Santa Clara River is one of the last free-flowing rivers in Southern California. It should be preserved and not altered. It should not be filled in or paved in any way. The river is a scenic area which should not be damaged.

### **Response No. IE17-2:**

The comment expresses a preference that the Santa Clara River be preserved, not altered, filled in or paved in any way and that the river is a scenic area which should not be damaged. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

### **Comment No. IE17-3:**

Endangered species should receive better protections for their environment.

### **Response No. IE17-3:**

The comment expresses an opinion that endangered species should receive better protections for their environment. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

### **Comment No. IE17-4:**

There should be at least a 250 yard undeveloped buffer zone on the sides of the river and around endangered plants which cannot be developed.

### **Response No. IE17-4:**

The comment expresses a preference that there should be at least a 250-yard undeveloped buffer zone on the sides of the river and around endangered plants which cannot be developed. The comment does not address any particular aspect of the AEA and, therefore, no further response can be provided. Please also refer to **Response to Comment No. IE15-15**, **Response to Comment No. IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to

buffer distance around the Santa Clara River and spineflower preserves, and the endowment for the spineflower preserve system. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE17-5:**

No runoff should be allowed to enter the river.

**Response No. IE17-5:**

The comment expresses a preference that no runoff should be allowed to enter the river. The comment does not address any particular aspect of the AEA and, therefore, no further response can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE17-6:**

It is improper to build homes over an oil field (Mission Village) because of health risks and environmental risks in that area.

**Response No. IE17-6:**

This comment is substantively the same as Comment No. IE15-1. Please refer to **Response to Comment No. IE15-1**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the location of proposed housing development with regard to potential health and environmental risks.

**Comment No. IE17-7:**

The traffic analysis is not adequate because it is outdated and it does not account for current or future traffic levels.

**Response No. IE17-7:**

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment No. IE15-2**, as well as **Topical Response No. 4: Traffic Impact Analysis**, for a detailed discussion of issues related to the traffic analysis conducted for the project.

**Comment No. IE17-8:**

There is a limit to the proper amount of density in a particular area. There has already been extensive development in the Santa Clarita Valley. The current proposal creates excessive development and excessive traffic in an area which should be left as agricultural land, parks and open space.

**Response No. IE17-8:**

The comment expresses concerns regarding the amount of development associated with the project and that the area should be left as agricultural land, parks and open space. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Nonetheless, for informational purposes, the development that would be facilitated by approval of the project is designed to accommodate projected regional population and employment growth. Relatedly, approval of the project would facilitate the development of a master-planned community that accords to principles of sustainable design on a project site that has been slated for comparable development since the County of Los Angeles's 2003 approval of the Newhall Ranch Specific Plan. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE17-9:**

It is not OK to keep building as much density as possible in every open area. The free-flowing river and the open space should be preserved with a minimum of development.

**Response No. IE17-9:**

The comment expresses concerns regarding the location of proposed development and that the “free-flowing river and the open space should be preserved with a minimum of development.” The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Refer to **Response to Comment No. IE17-8** for information regarding the location of the development associated with the project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE17-10:**

The claim of “net zero” greenhouse gas emissions is not believable from a large development in an open area which is experiencing global warming.

**Response No. IE17-10:**

The comment states that the “claim of ‘net zero’ GHG emissions is not believable from a large development in an open area which is experiencing global warming.” With regard to this issue, CARB reviewed the emissions inventory for the project and determined that the AEA “provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.” CARB also has identified this project as a recent example of a sustainable land use development project that has “demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions” (see p. 136 of the Draft 2017 Climate Change Scoping Plan Update). Thus, the AEA’s determination that the project would result in net zero GHG emissions is reasonable and is supported by substantial evidence.

**Comment No. IE17-11:**

The river area in its natural state is an important asset which should be preserved as much as possible in its natural state.

**Response No. IE17-11:**

The comment expresses a preference that the river should be preserved as much as possible in its natural state. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

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**IE18. Letter from Marilyn Paladin, dated February 13, 2017**

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The comments provided in this letter are substantively the same as those provided in Letter No. 247. For informational purposes, responses are provided below for each comment included in this comment letter.

**Comment No. IE18-1:**

I am opposed to the Newhall Ranch phases 2 and 3 in their current size.

**Response No. IE18-1:**

The comment expresses general opposition to Newhall Ranch phases 2 and 3 based on their current size. Based on the subject line of this letter, Newhall Ranch phases 2 and 3 are the Mission Village and Landmark Village projects, which are located within the RDMP/SCP project area. The comment does not raise any issue concerning the adequacy of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

**Comment No. IE18-2:**

The Santa Clara River is one of the last free-flowing rivers in Southern California. It should be preserved and not altered. It should not be filled in or paved in any way. The river is a scenic area which should not be damaged.

**Response No. IE18-2:**

The comment expresses a preference that the Santa Clara River be preserved, not altered, filled in or paved in any way and that the river is a scenic area which should not be damaged. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE18-3:**

Endangered species should receive better protections for their environment.

**Response No. IE18-3:**

The comment expresses an opinion that endangered species should receive better protections for their environment. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE18-4:**

There should be at least a 250 yard undeveloped buffer zone on the sides of the river and around endangered plants which cannot be developed.

**Response No. IE18-4:**

The comment expresses a preference that there should be at least a 250-yard undeveloped buffer zone on the sides of the river and around endangered plants which cannot be developed. The comment does not

address any particular aspect of the AEA and, therefore, no further response can be provided. Please also refer to **Response to Comment Nos. IE15-15 and IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to buffer distance around the Santa Clara River and spineflower preserves, and the endowment for the spineflower preserve system. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE18-5:**

No runoff should be allowed to enter the river.

**Response No. IE18-5:**

The comment expresses a preference that no runoff should be allowed to enter the river. The comment does not address any particular aspect of the AEA and, therefore, no further response can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE18-6:**

It is improper to build homes over an oil field (Mission Village) because of health risks and environmental risks in that area.

**Response No. IE18-6:**

This comment is substantively the same as Comment No. IE15-1. Please refer to **Response to Comment No. IE15-1**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the location of proposed housing development with regard to potential health and environmental risks.

**Comment No. IE18-7:**

The traffic analysis is not adequate because it is outdated and it does not account for current or future traffic levels.

**Response No. IE18-7:**

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment No. IE15-2**, as well as **Topical Response No. 4: Traffic Impact Analysis**, for a detailed discussion of issues related to the traffic analysis conducted for the project.

**Comment No. IE18-8:**

There is a limit to the proper amount of density in a particular area. There has already been extensive development in the Santa Clarita Valley. The current proposal creates excessive development and excessive traffic in an area which should be left as agricultural land, parks and open space.

**Response No. IE18-8:**

The comment expresses concerns regarding the amount of development associated with the project and that the area should be left as agricultural land, parks, and open space. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Nonetheless, for informational purposes, the development that would be facilitated by approval of the project is designed to accommodate projected regional population and employment growth. Relatedly, approval of the project would facilitate the development of a master-planned community that accords to principles of sustainable design on a project site that has been slated for comparable development since the County of Los Angeles's 2003 approval of the Newhall Ranch Specific Plan. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.



**Comment No. IE18-9:**

It is not OK to keep building as much density as possible in every open area. The free-flowing river and the open space should be preserved with a minimum of development.

**Response No. IE18-9:**

The comment expresses concerns regarding the location of proposed development and that the “free-flowing river and the open space should be preserved with a minimum of development.” The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. Refer to **Response to Comment No. IE18-8** for information regarding the location of the development associated with the project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE18-10:**

The claim of “net zero” greenhouse gas emissions is not believable from a large development in an open area which is experiencing global warming.

**Response No. IE18-10:**

The comment states that the “claim of ‘net zero’ greenhouse gas emissions is not believable from a large development in an open area which is experiencing global warming.” With regard to this issue, CARB reviewed the emissions inventory for the project and determined that the AEA “provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.” (A copy of CARB’s November 3, 2016 letter memorializing their technical evaluation of the project’s emissions inventory data is located in Final AEA Appendix 1) CARB also has identified this project as a recent example of a sustainable land use development project that has “demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions” (see p. 136 of the Draft The 2017 Climate Change Scoping Plan Update). Thus, the AEA’s determination that the project would result in net zero GHG emissions is reasonable and is supported by substantial evidence.

**Comment No. IE18-11:**

The river area in its natural state is an important asset which should be preserved as much as possible in its natural state.

**Response No. IE18-11:**

The comment expresses a preference that the river should be preserved as much as possible in its natural state. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

## **IE19. Letter from Susann Rizzo, dated February 11, 2017**

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### **Comment No. IE19-1:**

The following points must be considered concerning the Newhall Ranch Project.

### **Response No. IE19-1:**

The comment is an introduction to comments that follow. No further response is required.

### **Comment No. IE19-2:**

The project violates protections that are established to enhance all our lives and to protect species that are threatened.

### **Response No. IE19-2:**

The comment expresses concerns that the project violates protections that are established to enhance all our lives and to protect species that are threatened. The comment does not address any particular aspect of the AEA and, therefore, no further response is required or can be provided. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

### **Comment No. IE19-3:**

Traffic congestion in the Santa Clarita area is already over the top and will only get worse if Landmark Village and Mission Village are built as planned. It is necessary to consider these two factors together and absolutely ensure no net increase in GHG for these projects.

### **Response No. IE19-3:**

This comment is substantively the same as Comment No. IE15-3. Please refer to **Response to Comment No. IE15-3**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the relationship between GHG emissions and traffic congestion.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

### **Comment No. IE19-4:**

The severe water cutbacks required in the SCV in the last six years are new information showing that we cannot accommodate this massive project with our current water resources. That water table dropped 70 feet and several wells went dry.

### **Response No. IE19-4:**

This comment is substantively the same as Comment No. IE15-10. Please refer to **Response to Comment No. IE15-10**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the availability of water from "current resources" to meet the water demand attributable to development associated with the project.

### **Comment No. IE19-5:**

There have been a lot of articles about how offsets are often a green washing scam. What guarantee do we have that the offsets being purchased as GHG mitigation will result in measurable, provable, reductions in GHG emissions beyond what would have otherwise occurred?

**Response No. IE19-5:**

This comment is substantively the same as Comment No. IE15-11. Please refer to **Response to Comment No. IE15-11** for a detailed discussion of issues related to whether the carbon offsets which may be purchased by the project applicant will result in measurable GHG reductions beyond what would have otherwise occurred.

**Comment No. IE19-6:**

Mitigation for GHG that is proposed to be bought as pollution credits in other countries is unenforceable and unverifiable. AND it will not help our local air pollution problems.

**Response No. IE19-6:**

This comment is substantively the same as Comment No. IE15-12. Please refer to **Response to Comment No. IE15-12**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the purchase of carbon offsets in other countries as well as local air quality conditions.

**Comment No. IE19-7:**

No mention or itemization of the external creators of GHG for this project, like methane from waste disposal, energy production for water delivery and desalination of waste water, off site energy production for infrastructure, auto and truck deliveries and other uses is not in the Environmental document because those chapters are excluded from the document. These issues must be discussed in order for the document to be valid.

**Response No. IE19-7:**

This comment is substantively the same as Comment No. IE15-13. Please refer to **Response to Comment No. IE15-13** for a detailed discussion of issues related to the sources of GHG emissions generated by development associated with the project.

**Comment No. IE19-8:**

Our Valley is already out of federal compliance for dust pollution (PM10 and PM mil) that causes asthma and permanent lung damage and affects our children's health. Filling the flood plain with 200 million cubic yards of dirt will substantially add to this pollution.

**Response No. IE19-8:**

This comment is substantively the same as Comment No. IE15-14. Please refer to **Response to Comment No. IE15-14**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to dust emissions associated with the project's floodplain-related grading activities.

**Comment No. IE19-9:**

To protect the river water quality and the endangered fish, the project should be moved away from the Santa Clara River.

**Response No. IE19-9:**

This comment is substantively the same as Comment No. IE15-15. Please refer to **Response to Comment No. IE15-15**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to water quality, endangered fish species, and the lack of a need to move the project.

**Comment No. IE19-10:**

Filling the floodplain with 200 million cubic yards of dirt hurts water replenishment and will massively add to dust pollution in the Santa Clarita Valley.

**Response No. IE19-10:**

This comment is substantively the same as Comment No. IE15-16. Please refer to **Response to Comment No. IE15-16**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the intersection of floodplain-related grading activities and air quality, as well as issues related to water replenishment.

**Comment No. IE19-11:**

Your consideration of these factors will lead you to the correct decision. The Newhall Ranch Project must not be approved.

**Response No. IE19-11:**

CDFW has reviewed all of the comments provided in this letter and provided above are the responses to each of the comments. The comment's request that the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area, not be approved is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

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**IE20. Letter from David Rodgers, dated February 13, 2017**

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**Comment No. IE20-1:**

I disagree that the impact statement adequately addresses GHG emissions.

**Response No. IE20-1:**

The comment opines that the AEA does not adequately address the project's GHG emissions. As the comment does not identify any specific flaw or error in the AEA, no more specific response can be provided. The comment will be included in the record and made available to the decision makers prior to a final decision on the project.

**Comment No. IE20-2:**

There is no guarantee any significant portion of the homeowners will install rooftop solar or drive electric cars.

**Response No. IE20-2:**

The comment states that there is no guarantee that the homeowners will install rooftop solar or drive electric cars. In response, implementation of the project's mitigation framework will be governed by CEQA-mandated MMRP, a copy of which is located in Final AEA Appendix 2. As provided in the MMRP and Mitigation Measures 2-1 and 2-2, issuance of building permits from the County of Los Angeles is contingent upon the demonstration that the subject buildings being permitted will achieve the California Energy Commission's ZNE standard. Similarly, as provided in the MMRP and Mitigation Measures 2-4 and 2-5, the issuance of building permits from the County of Los Angeles is contingent upon the demonstration that the required electric vehicle charging infrastructure is provided for in the building design plans. Specific to Mitigation Measure 2-4, the County of Los Angeles also will track the use of the ZEV purchase subsidies.

**Comment No. IE20-3:**

Further, the massive traffic jams on both 1-5 and 1-14 which will be caused by the greatly-increased numbers of commuters on 1-5 will result in substantial GHG emissions by all commuters passing through Santa Clarita.

**Response No. IE20-3:**

The comment refers to traffic congestion that will be caused by the project, and its corresponding GHG emissions. The issue of traffic congestion is outside the scope of the AEA (please see **Topical Response 1: Scope of Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.8; Traffic), and the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to traffic. Please also see **Topical Response 4: Traffic Impact Analysis** for additional relevant information that is responsive to this comment.

As to the GHG emissions generated by project-related traffic, Section 2 of the Draft AEA accounts for the project's mobile source emissions (see pp. 2-18 and 2-19). The mobile source emissions were estimated by CalEEMod®, the industry standard modeling platform for purposes of CEQA, using project-specific inputs from the 2010 Final EIR's traffic analysis. The project's mitigation framework is designed to ensure that all project-related GHG emissions, including those attributable to mobile sources, are reduced to net zero through implementation of Mitigation Measures 2-1 through 2-13.

**Comment No. IE20-4:**

Further, the increase in auto emissions will substantially degrade the air quality in the Santa Clarita Valley, resulting in increased health problems for Santa Clarita residents.

**Response No. IE20-4:**

The comment states that project-related traffic will adversely impact air quality in the Santa Clarita Valley. The issue raised by the comment is outside the scope of the AEA (please see **Topical Response 1: Scope of the Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issue referenced was evaluated and studied in the 2010 Final EIR (see Section 4.7, Air Quality), and the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to air quality. Please also see **Response to Comment No. 09-102** for additional relevant information that is responsive to this comment.

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**IE21. Letter from Denice Schelling (not dated)**

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**Comment No. IE21-1:**

My comments are regarding the unarmored threespine stickleback fish.

**Response No. IE21-1:**

The comment states that the comments that follow are in relation to the unarmored threespine stickleback fish. As no deficiency of the Draft AEA has been raised, no further response is required.

**Comment No. IE21-2:**

If 5 Point LLC's latest draft AEA proposed modified design and construction methods for bridges and bank stabilization truly would prevent extinction due to the project, I'd feel more comfortable. It's the bank stabilization that worries me. Fish rely on a large number of criteria for their survival, including run-off of minerals, natural debris and nutrients from unstabilized banks. Are you taking in to consideration these factors and more?

**Response No. IE21-2:**

The comment asks whether the Draft AEA modified design and construction methods for the bridges and bank stabilization would prevent extinction of the unarmored threespine stickleback. The comment then raises concerns about the bank stabilization and whether certain criteria related to run-off of minerals, natural debris, and nutrients that occur in locations with unstabilized banks have been taken into consideration for the project.

The modified design and construction methods for the project bridges and bank stabilization will prevent the taking of unarmored stickleback during construction, in addition to avoiding significant impacts to aquatic habitats. As construction impacts have been avoided, the construction of project bridges and bank stabilization would not contribute to the extinction of the unarmored threespine stickleback (or any other species), if such an extinction were to occur.

Specific to long-term effects of bank stabilization, as described in the 2010 Final EIR, the bank stabilization has been moved away from the edge of the riparian corridor and wetted channel of the river, providing a buffer from the existing riparian habitat. In most areas, the bank stabilization will be within existing agricultural fields, and these agricultural field areas do not currently provide any of the natural processes or benefits described in the comment. However, the project does incorporate buried soil cement and turf reinforcement mats as part of the bank stabilization and development flood protection along the Santa Clara River, both of which accommodate the establishment of native vegetation in the natural soil material that is covering the buried structure. Areas where bank stabilization is installed will be revegetated with native plant species to create and/or restore the natural habitat presently found along the river. The buried soil cement would not be visible, and the land above it would be used for an upland habitat buffer, similarly planted with native vegetation. In this manner, the design of the buried bank stabilization mimics natural conditions and would not adversely affect fish or aquatic habitats.

**Comment No. IE21-3:**

All I can ask, if this project is allowed to proceed as proposed, is that you monitor the construction like a hawk. I have seen firsthand in the Canyon Country region the disregard for promises, rules of construction, etc. on un-monitored building sites.

**Response No. IE21-3:**

The comment requests that the project be monitored closely ("like a hawk") for compliance with promises, rules of construction, etc. on un-monitored building sites.

Existing mitigation measures adopted by the 2010 Final EIR and proposed in the Draft AEA require a qualified biologist to monitor construction within or adjacent to natural areas. In many situations, the monitoring biologist is given the authority to suspend work activities in protection of species of concern. In addition, the permittee is required to provide routine reports on construction monitoring activities to CDFW staff for review. For further information, please refer to the Draft AEA, Section 3.0, pp. 3-23 through 3-37 (mitigation measures); and the Errata to the Mitigation MMPP (Final AEA Appendix 2), which will be included in the Responses to Comments document.

**Comment No. IE21-4:**

What I would propose is moving the project back away from the banks of the Santa Clara River an additional distance to add a little more buffer. I've seen bank stabilization in Canyon Country destroy too much of the habitat.

**Response No. IE21-4:**

The comment requests that the project be moved back away from the banks of the Santa Clara River to provide "a little more buffer."

As discussed in **Response to Comments No. IE21-2**, above, the bank stabilization alignment has been moved away from the majority of the Santa Clara River riparian habitat. As determined in the 2010 Final EIR, the buffer provided by the project is adequate to maintain the natural condition of the Santa Clara River, including preserving river hydrology, riparian habitats, wildlife movement, and geomorphological and fluvial functions of the river corridor.



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**IE22. Letter from Heather Shields, dated February 13, 2017**


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**Comment No. IE22-1:**

Thank you for taking the time to read public comments regarding the two proposed towns along the Santa Clara River. I have several concerns with the two projects proposed.

**Response No. IE22-1:**

This comment is an introduction to the comments that follow. No further response is required.

**Comment No. IE22-2:**

In the Landmark Village EIR, it states that “given the presence of a culvert underneath SR-126..., wildlife could cross under SR-126 and continue to move north through Chiquito Canyon.” The link to the BIOS viewer by the CDFW was incorrect in EIR, but I did finally find the map of the Essential Connectivity Areas surrounding the project. On this map, the red area is the Essential Connectivity Area. The culvert is outside of the ECA.

**Response No. IE22-2:**

The comment references the Newhall Ranch Landmark Village EIR, which is not before CDFW at this time. Instead, the Landmark Village EIR and related additional analysis currently are being considered by the County of Los Angeles. Accordingly, comments concerning the Landmark Village EIR are beyond the scope of the Draft AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**). Nonetheless, for information purposes, wildlife crossings, including the Chiquito culvert, were evaluated by CDFW in the 2010 Final EIR. (See 2010 Final EIR, pp. 4.5-265 through 4.5-279.) The comment presents no new significant information, nor any new or more severe impacts associated with wildlife crossings; and, thus, no further response is required.

**Comment No. IE22-3:**

It also doesn't state how big the culvert is. Is it big enough for a Mountain lion to fit through, or just a field mouse?

**Response No. IE22-3:**

The comment asked about the size of the Chiquito culvert, which acts as a wildlife movement crossing within the project vicinity. First, please refer to **Response to Comment No. IE22-2**, above. Second, the 2010 Final EIR, prepared and certified by CDFW, fully evaluated wildlife connectivity, wildlife landscape habitat linkages, wildlife corridors, wildlife crossings, and wildlife buffers (see 2010 Final EIR, pp. 4.5-265 through 4.5-279). In addition, the 2010 Final EIR specifically addresses existing man-made wildlife crossings in the project vicinity, including the Chiquito culvert located under SR-126, and indicates it should not significantly constrain wildlife movement in the area:

**Figure 4.5-32** shows six of the largest existing crossings that can be accessed by wildlife coming directly from adjacent uplands or by moving along the Santa Clara River. Three of the crossings shown in **Figure 4.5-32** are in Ventura County west of the project area. These six crossings are associated with current agricultural operations and are bridges or culverts large enough for vehicle passage, as illustrated in **Figure 4.5-32**. The large culverts in Ventura County are about 4.4 meters (14 feet, 7 inches) in height, 7.5 meters (25 feet) in width, and 51.8 meters (170 feet) in length, resulting in an openness factor of 0.65, which well exceeds the openness factor of 0.25 found by Donaldson (2005) to be adequate for white-tailed deer. They are therefore expected to provide adequate passage for high mobility ground-dwelling species such as mule deer, mountain lion, and black bear. The easternmost of the Ventura County crossings serve wildlife passing through the project area via the Salt Creek corridors discussed above as well as Tapo Canyon in Ventura County. Within the project area, there are existing crossings at San Martinez Grande Canyon, Chiquito

Canyon, and at the Castaic Creek confluence with the Santa Clara River. These crossings are short and open and include soft-bottom overpasses at the San Martinez Grande Canyon and Castaic Creek crossings and a large parallel set of box culverts at the Chiquito Creek crossing (**Figure 4.5-32**). These crossings should not significantly constrain current wildlife movement in the area. (2010 Final EIR, pp. 4.5-275 and 2.5-276.)

**Comment No. IE22-4:**

In the “Significant Unavoidable Impacts” section of Landmark’s EIR, it states that even with mitigation efforts, “the proposed project’s contribution to cumulative impacts to coastal scrub would remain significant.” Earlier in the EIR, it was stated that native wildlife, protected and common, were most abundant in coastal scrub, margins of agricultural fields, riparian woodland, and grassland habitats. In significantly impacting the coastal scrub, developing the agricultural fields, woodlands and grasslands, where is the wildlife to go?

**Response No. IE22-4:**

The comment references the Newhall Ranch Landmark Village EIR, which is not before CDFW at this time. Instead, the Landmark Village EIR and related additional analysis currently are being considered by the County of Los Angeles. Accordingly, comments concerning the Landmark Village EIR are beyond the scope of the Draft AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**). Nonetheless, for information purposes, CDFW also notes that the project applicant’s proposal to modify the construction methods, bridges, and bank stabilization, or its proposal to reduce project GHG emissions to net zero do not present any significant new information, nor result in any new or more severe impacts to coastal sage scrub. Further, information about the avoidance, minimization and mitigation of impacts to wildlife is analyzed extensively in the 2010 Final EIR, Section 4.5, Biological Resources. The commenter is referred to the 2010 Final EIR (Section 4.5) for responsive information.

**Comment No. IE22-5:**

Several places the EIR states that an Integrated Pest Management Plan will address the use of pesticides and prohibit the use of anticoagulant rodenticides. However, other places in the EIR, it states “A program of aggressive rodent control shall be implemented to control burrowing on slope areas.” What is “aggressive rodent control” and what are the slope areas? The banks of the Santa Clara River? Rodenticides are not only extremely toxic to predators, but also to fish and marine wildlife. If aggressive rodent control means that they will be using rodenticides to control burrowing rodents on the banks of the river, then the “take” of the unarmored threespine stickleback should be the least of our concerns for this endangered fish.

**Response No. IE22-5:**

The comment references the Newhall Ranch Landmark Village EIR, which is not before CDFW at this time. Instead, the Landmark Village EIR and related additional analysis currently are being considered by the County of Los Angeles. Accordingly, comments concerning the Landmark Village EIR are beyond the scope of the Draft AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**). Nonetheless, for information purposes, CDFW also notes that the project applicant’s proposal to modify the construction methods, bridges, and bank stabilization, or its proposal to reduce project GHG emissions to net zero do not present any significant new information, nor result in any new or more severe impacts resulting from pesticides or anticoagulant rodenticides.

In addition, the comment is unclear as to the reference to the “Integrated Pest Management Plan” from “the EIR.” CDFW assumes the comment is still referring to the Landmark Village EIR under the County of Los Angeles’ jurisdiction. Nonetheless, for information purposes, the 2010 Final EIR incorporates a water quality Mitigation Measure (WQ-2), which requires the project applicant to submit to the Los Angeles County Department of Regional Planning a “Landscape and Integrated Pest Management Plan,” identified in the EIR’s water quality section (2010 Final EIR, Section 4.4), which must be designed to meet specific performance standards. This plan is only to be developed and implemented for “common area landscaping within the Specific Plan, Entrada, and [Valencia Commerce Center] Project.” In contrast, the Santa Clara

River Corridor Special Management Area (SMA)/ Significant Ecological Area (SEA)-23 is part of the project's dedicated open space – and not part of the common area landscaping within and adjacent to development areas within the Specific Plan, Entrada, and the Valencia Commerce Center.

**Comment No. IE22-6:**

The 1PM will only dictate how rodenticides will be used during construction. With the thousands of residential and commercial units being built near the river, there is no stopping these new residents and retail units from using anticoagulant rodenticides and any kind of rodenticide, for that matter (even the non-anticoagulant forms are extremely toxic to marine life).

**Response No. IE22-6:**

Please refer to **Response to Comment No. IE22-5**.

**Comment No. IE22-7:**

The runoff from potential landscape watering and infrequent rain showers can and will flush these toxins into the river and harm the marine life living there.

**Response No. IE22-7:**

The comment discusses runoff from potential landscape areas flushing toxins into the river and harming marine life. As an initial matter, the comment does not address an issue currently under review in the Draft AEA. The Draft AEA addresses two issues: (1) the EIR's GHG emissions significance findings, and (2) construction modifications to bridges and bank stabilization in a manner that avoids all contact with the wetted channel of the Santa Clara River (i.e., the "No Water Contact" construction approach). The comment does not appear to address either of these issues, but instead is focused on runoff from potential landscape watering areas in or adjacent to development areas – a topic that received extensive analysis in the 2010 Final EIR. Nonetheless, for information purposes, please refer to the 2010 Final EIR, Section 4.1, Surface Water Hydrology and Flood Control.

**Comment No. IE22-8:**

This area is also rife with raptors and mammalian predators that are at risk of preying on a poisoned rodent.

**Response No. IE22-8:**

The comment discusses raptors and predators at risk from poisoned rodents. For information responsive to this comment, please refer to **Response to Comment Nos. IE22-5 and IE22-7**.

**Comment No. IE22-9:**

The IPM is useless after construction is complete.

**Response No. IE22-9:**

The comment questions the usefulness of the referenced Integrated Pest Management Plan after construction is complete. For information responsive to this comment, please refer to **Response to Comment No. IE22-5**.

**Comment No. IE22-10:**

Thank you for taking the time to listen to our concerns. I hope that you will take steps to ensure that our wildlife is protected to the furthest extent.

**Response No. IE22-10:**

This comment provides a conclusion to the comments raised above. No further response is required. Nonetheless, for information purposes, responsive information about the avoidance, minimization and

mitigation of impacts to wildlife is analyzed extensively in the 2010 Final EIR, Section 4.5, Biological Resources. The commenter is referred to the 2010 Final EIR (Section 4.5) for responsive information.

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**IE23. Letter from Jeffrey Skolnik, dated February 13, 2017**

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**Comment No. IE23-1:**

I'm writing to urge you to reject Newhall Ranch's latest proposal; the Mission and Landmark "villages" are an ill-conceived new city cloaked in feel-good promises of "net zero" greenhouse gas emissions.

**Response No. IE23-1:**

This comment expresses disapproval of the proposals for the Mission Village and Landmark Village projects. The comment does not comment on any specific issue concerning the adequacy of the AEA for the RMDP/SCP project. Therefore, no further response is required or can be provided.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

This comment is substantively the same as **Comment No. IE2-1**. Please refer to **Response to Comment No. IE2-1** for a detailed discussion regarding the project's commitment to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE23-2:**

In reality, many of the emissions reductions won't occur on site, or even in California but instead, would come from carbon marketers selling offsets of an unknown quantity.

**Response No. IE23-2:**

This comment expresses disapproval of the project's GHG Reduction Plan, in particular the locational aspects of the Direct Reduction Activities. The comment provides no evidence to support its statements and does not provide a specific critique of any element of the AEA. This comment is substantively the same as Comment No. IE2-2. Please refer to **Response to Comment No. IE2-2** for a detailed discussion of the use of direct reduction activities and carbon offsets to mitigate the project's emissions through the GHG Reduction Plan. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE23-3:**

The environmental impact reports contain no clear standards to ensure that offsets represent real, enforceable, verifiable reductions that wouldn't have occurred anyway.

**Response No. IE23-3:**

This comment is substantively the same as Comment No. IE2-3. Please refer to **Response to Comment No. IE2-3** for a detailed discussion of how carbon offsets, which may be purchased by the Applicant for compliance with Mitigation Measures 2-10 and 2-13, will result in measurable GHG reductions beyond what would have otherwise occurred. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE23-4:**

What's more, although Newhall is now promising "no water contact" bridge construction to protect the highly imperiled stickleback fish, there are no safeguards in place to ensure this federally protected species won't be harmed through the life of the project.

**Response No. IE23-4:**

This comment is substantively the same as Comment No. IE2-4. Please refer to **Response to Comment No. IE2-4** for a detailed discussion of the proposed modified bridge and bank stabilization construction methods that avoid impacts to unarmored threespine stickleback by eliminating the need for stream diversion, fish collection, and fish relocation as previously required by Mitigation Measures BIO-44 and BIO-46, thereby eliminating the need for these two measures. As discussed in the Draft AEA, impacts from project construction on the unarmored threespine stickleback will be less than significant. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE23-5:**

That's why I urge the county to reject these projects and not certify the current environmental impact reports, which focus solely on greenhouse gasses and stickleback.

**Response No. IE23-5:**

This comment asks the County to not certify the project's EIR and notes that the AEA focuses only on GHG emissions and the mitigation measures related to the unarmored threespine stickleback. The comment does not address any particular aspect of the AEA and, therefore, no further response is required. In addition, this comment is substantively the same as Comment No. IE2-6. Please refer to **Response to Comment No. IE2-6**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE23-6:**

The mission and Landmark projects remain a disaster for the Santa Clara River and valley.

**Response No. IE23-6:**

This comment expresses disapproval of the Mission Village and Landmark Village projects, and does not raise any specific issue concerning the adequacy of the AEA. Therefore, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE23-7:**

And at a minimum, the county must embark on a full environmental review that reflects current standards for smart growth instead of trying to implement an outdated, 14-year-old "Newhall Specific Plan" through piecemeal environmental review.

**Response No. IE23-7:**

This comment is substantively the same as Comment No. IE2-8. Please refer to **Response to Comment No. IE2-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA as well as project compliance with all CEQA requirements. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

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**IE24. Letter from Joyce Stein, dated February 02, 2017**

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**Comment No. IE24-1:**

Houses should not be built over a closed oil field (Mission Village). There is too great a chance that airborne VOCs will leak up into the homes.

**Response No. IE24-1:**

This comment is substantively the same as Comment No. IE15-1. Please refer to **Response to Comment No. IE15-1**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the location of proposed housing development and the potential for VOCs to affect future on-site residents.

**Comment No. IE24-2:**

The exclusion of a traffic chapter make the supplemental document inadequate because traffic has greatly increased since the 2007 review was released and new projects have been approved. A chapter updating the traffic analysis should be added.

**Response No. IE24-2:**

This comment is substantively the same as Comment No. IE15-2. Please refer to **Response to Comment No. IE15-2**, as well as **Topical Response No. 4: Traffic Impact Analysis Update** for a detailed discussion of issues related to the traffic analysis conducted for the project.

**Comment No. IE24-3:**

Controlling greenhouse gases and traffic congestion are intimately related. Traffic congestion in the Santa Clarita area is already over the top and will only get worse if Landmark Village and Mission Village are built as planned. It is necessary to consider these two factors together and absolutely ensure no net increase in GHG for these projects.

**Response No. IE24-3:**

This comment is substantively the same as Comment No. IE15-3. Please refer to **Response to Comment No. IE15-3**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the relationship between GHG emissions and traffic congestion.

**Comment No. IE24-4:**

The project is still too big and impactful to the Valley and flies in the face of 21st century smart planning—it needs to be significantly scaled back and away from the Santa Clara River

**Response No. IE24-4:**

This comment is substantively the same as Comment No. IE15-8. Please refer to **Response to Comment No. IE15-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the amount and location of proposed development.

**Comment No. IE24-5:**

There is no analysis of the methane that will be generated from trash created by this massive project, what about emissions from trash truck- the GHG analysis is not sufficient

**Response No. IE24-5:**

This comment is substantively the same as Comment No. IE15-9. Please refer to **Response to Comment No. IE15-9** for a detailed discussion of issues related to methane emissions associated with solid waste disposal

as well as GHG emissions associated with the haul truck trips necessary to transport project-related solid waste.

**Comment No. IE24-6:**

- ▲ The severe water cutbacks required in the SCV in the last six years are new information showing that cannot accommodate this massive project with our current water resources. That water table dropped 70 feet and several wells went dry.

**Response No. IE24-6:**

This comment is substantively the same as Comment No. IE15-10. Please refer to **Response to Comment No. IE15-10**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the availability of water from “current resources” to meet the water demand attributable to development associated with the project.

**Comment No. IE24-7:**

- ▲ Mitigation for GHG that is proposed to be bought as pollution credits, in other countries is unenforceable and unverifiable. AND it will not help our local air pollution problems.

**Response No. IE24-7:**

This comment is substantively the same as Comment No. IE15-12. Please refer to **Response to Comment No. IE15-12**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the purchase of carbon offsets in other countries as well as local air quality conditions.

**Comment No. IE24-8:**

- ▲ Our Valley is already out of federal compliance for dust pollution (PM10 and PM2.5) that causes asthma and permanent lung damage and affects our children's health. Filling the flood plain with 200 million cubic yards of dirt will substantially add to this pollution.

**Response No. IE24-8:**

This comment is substantively the same as Comment No. IE15-14. Please refer to **Response to Comment No. IE15-14**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to dust emissions associated with the project's floodplain-related grading activities.

**Comment No. IE24-9:**

- ▲ To protect the river water quality and the endangered fish, the project should be moved away from the Santa Clara River.

**Response No. IE24-9:**

This comment is substantively the same as Comment No. IE15-15. Please refer to **Response to Comment No. IE15-15**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to water quality, endangered fish species, and the lack of a need to move the project.

**Comment No. IE24-10:**

Filling the floodplain with 200 million cubic yards of dirt hurts water replenishment and will massively add to dust pollution in the Santa Clarita Valley.



**Response No. IE24-10:**

This comment is substantively the same as Comment No. IE15-16. Please refer to **Response to Comment No. IE15-16**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the intersection of floodplain-related grading activities and air quality as well as issues related to water replenishment.

**Comment No. IE24-11:**

There should be a .25 mile buffer around tile spine flower preserves to protect this endangered flower. The proposed endowment is not sufficient to provide protection. We see what has happened in the Valley Oaks Savannah (SEA 64 - no trails as promised. inadequate management to preserve the oaks, and oaks are dying)

**Response No. IE24-11:**

This comment is substantively the same as Comment No. IE15-17. Please refer to **Response to Comment No. IE15-17**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to buffer distance around the spineflower preserves and the endowment for the spineflower preserve system.

**Comment No. IE24-12:**

I live in Santa Clarita and these projects are not good for the environment.  
Thank you for taking my comment.

**Response No. IE24-12:**

The comment expresses general opposition to the project and does not raise any specific issues with regard to the potential environmental impacts of the project. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

## **IE25. Letter from Diane Trautman, dated February 13, 2017**

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### **Comment No. IE25-1:**

(Letter also sent to Los Angeles County Department of Regional Planning)

### **Response No. IE25-1:**

The comment indicates that this letter was also sent to the Los Angeles County Department of Regional Planning. No further response is required.

### **Comment No. IE25-2:**

I'm writing to urge you to reject Newhall Ranch's latest proposal; the Mission and Landmark "villages" are an ill-conceived new city cloaked in feel-good promises of "net zero" greenhouse gas emissions.

### **Response No. IE25-2:**

This comment expresses disapproval of the proposals for the Mission Village and Landmark Village projects. The comment does not comment on any specific issue concerning the adequacy of the AEA for the RMDP/SCP Project. Therefore, no further response is required or can be provided.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP Project, the approval of which would facilitate development of the two referenced villages.

This comment is substantively the same as Comment No. IE2-1. Please refer to **Response to Comment No. IE2-1** for a detailed discussion regarding the project's commitment to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

### **Comment No. IE25-3:**

In reality many of the emissions reductions won't occur on site, or even in California, but instead would come from carbon marketers selling offsets of unknown quantity.

### **Response No. IE25-3:**

This comment expresses disapproval of the project's GHG Reduction Plan, in particular the locational aspects of the Direct Reduction Activities. The comment provides no evidence to support its statements and does not provide a specific critique of any element of the AEA. This comment is substantively the same as Comment No. IE2-2. Please refer to **Response to Comment No. IE2-2** for a detailed discussion of the use of direct reduction activities and carbon offsets to mitigate the project's emissions through the GHG Reduction Plan. This comment is noted for the record and is included in this Final AEA document for review and consideration by the decision-makers.

### **Comment No. IE25-4:**

The environmental impact reports contain no clear standards to ensure that offsets represent real, enforceable, verifiable reductions that wouldn't have occurred anyway.

### **Response No. IE25-4:**

This comment is substantively the same as Comment No. IE2-3. Please refer to **Response to Comment No. IE2-3** for a detailed discussion of how carbon offsets, which may be purchased by the project applicant for compliance with Mitigation Measures 2-10 and 2-13, will result in measurable GHG reductions beyond what would have otherwise occurred. This comment is noted for the record and is included in this Responses to Comments document for review and consideration by the decision-makers.

**Comment No. IE25-5:**

What's more, although Newhall is now promising "no water contact" bridge construction to protect the highly imperiled stickleback fish, there are no safeguards in place to ensure this federally protected species won't be harmed through the life of the project.

**Response No. IE25-5:**

This comment is substantively the same as Comment No. IE2-4. Please refer to **Response to Comment No. IE2-4** for a detailed discussion of the proposed modified bridge and bank stabilization construction methods that avoid impacts to unarmored threespine stickleback by eliminating the need for stream diversion, fish collection, and fish relocation as previously required by Mitigation Measures BIO-44 and BIO-46, thereby eliminating the need for these two measures. As discussed in the Draft AEA, impacts from project construction on the unarmored threespine stickleback will be less than significant. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE25-6:**

That's why I urge the county to reject these projects and not certify the current environmental impact reports, which focus solely on greenhouse gases and stickleback.

**Response No. IE25-6:**

This comment asks the County to not certify the project's EIR and notes that the AEA focuses only on GHG emissions and the mitigation measures related to the unarmored threespine stickleback. The comment does not address any particular aspect of the AEA and, therefore, no further response is required. In addition, this comment is substantively the same as Comment No. IE2-6. Please refer to **Response to Comment No. IE2-6**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis** for a detailed discussion of issues related to the scope of the AEA. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE25-7:**

The Mission and Landmark projects remain a disaster for the Santa Clara River and valley.

**Response No. IE25-7:**

This comment expresses disapproval of the Mission Village and Landmark Village projects, and does not raise any specific issue concerning the adequacy of the AEA. Therefore, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE25-8:**

And at a minimum the county must embark on a full environmental review that reflects current standards for smart growth instead of trying to implement an outdated, 14-year-old "Newhall Specific Plan" through piecemeal environmental review.

**Response No. IE25-8:**

This comment is substantively the same as Comment No. IE2-8. Please refer to **Response to Comment No. IE2-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA as well as the project compliance with all CEQA requirements. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**IE26. Letter from Roselva Ungar, dated February 15, 2017**

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**Comment No. IE26-1:**

I'm writing to urge you to reject Newhall Ranch's latest proposal; the Mission and Landmark "village are an ill-conceived new city cloaked in feel-good promises of "net zero" greenhouse gas emissions.

**Response No. IE26-1:**

This comment expresses disapproval of the proposals for the Mission Village and Landmark Village projects. The comment does not comment on any specific issue concerning the adequacy of the AEA for the RMDP/SCP project. Therefore, no further response is required or can be provided.

It is also noted that CDFW is not CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

This comment is substantively the same as Comment No. IE2-1. Please refer to **Response to Comment No. IE2-1** for a detailed discussion regarding the project's commitment to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE26-2:**

In reality many of the emissions reductions won't occur on site, or even in California but instead would come from carbon marketers selling offsets of unknown quantity.

**Response No. IE26-2:**

This comment expresses disapproval of the project's GHG Reduction Plan, in particular the locational aspects of the Direct Reduction Activities. The comment provides no evidence to support its statements and does not provide a specific critique of any element of the AEA. This comment is substantively the same as Comment No. IE2-2. Please refer to **Response to Comment No. IE2-2** for a detailed discussion of the use of direct reduction activities and carbon offsets to mitigate the project's emissions through the GHG Reduction Plan. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE26-3:**

The environmental impact reports contain no clear standards to ensure that offsets represent real, enforceable, verifiable reductions that wouldn't have occurred anyway.

**Response No. IE26-3:**

This comment is substantively the same as Comment No. IE2-3. Please refer to **Response to Comment No. IE2-3** for a detailed discussion of how carbon offsets, which may be purchased by the Applicant for compliance with Mitigation Measures 2-10 and 2-13, will result in measurable GHG reductions beyond what would have otherwise occurred. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE26-4:**

What's more, although Newhall is now promising "no water contact" bridge construction to protect the highly imperiled stickleback fish, there are no safeguards in place to ensure this federally protected species won't be harmed through the life of the project.

**Response No. IE26-4:**

This comment is substantively the same as Comment No. IE2-4. Please refer to **Response to Comment No. IE2-4** for a detailed discussion of the proposed modified bridge and bank stabilization construction methods that avoid impacts to unarmored threespine stickleback by eliminating the need for stream diversion, fish collection, and fish relocation as previously required by Mitigation Measures BIO-44 and BIO-46, thereby eliminating the need for these two measures. As discussed in the Draft AEA, impacts from project construction on the unarmored threespine stickleback will be less than significant. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE26-5:**

That's why I urge the county to reject these projects and not certify the current environmental impact reports, which focus solely on greenhouse gases and stickleback.

**Response No. IE26-5:**

This comment asks the County to not certify the project's EIR and notes that the AEA focuses only on GHG emissions and the mitigation measures related to the unarmored threespine stickleback. The comment does not address any particular aspect of the AEA and, therefore, no further response is required. In addition, this comment is substantively the same as Comment No. IE2-6. Please refer to **Response to Comment No. IE2-6**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE26-6:**

The Mission and Landmark projects remain a disaster for the Santa Clara River and valley.

**Response No. IE26-6:**

This comment expresses disapproval of the Mission Village and Landmark Village projects, and does not raise any specific issue concerning the adequacy of the AEA. Therefore, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE26-7:**

And at a minimum the county must embark on a full environmental review that reflects current standards for smart growth instead trying to implement an outdated, 14-year-old "Newhall Specific Plan" through piecemeal environmental review.

**Response No. IE26-7:**

This comment is substantively the same as Comment No. IE2-8. Please refer to **Response to Comment No. IE2-8**, as well as **Topical Response No. 1: Scope of Additional Environmental Analysis**, for a detailed discussion of issues related to the scope of the AEA as well as project compliance with all CEQA requirements. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

## **IE27. Letter from Barbara Wampole, dated February 11, 2017**

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### **Comment No. IE27-1:**

These are the comments I submitted at the hearing in the Santa Clarita Valley plus a few additional comments]

### **Response No. IE27-1:**

This is an introductory comment to comments that follow. This comment will be included in the Final AEA and provided to decision makers for their consideration. No further response is required.

### **Comment No. IE27-2:**

**Good evening**

My name is Barbara Wampole and I'm speaking in opposition to the two agenda items #2 & # 3.

### **Response No. IE27-2:**

This comment introduces the speaker at the public hearing where these comments were submitted into the record. This comment will be included in the Final AEA and provided to decision makers for their consideration. No further response is required.

### **Comment No. IE27-3:**

Thank you for coming to the SCV tonight.

I'm a 45 yr resident of the SCV, a founding member and vice chair of Friends of the Santa Clara River (FSCR), and a local business woman.

On behalf of the FSCR and my local community, we continue to strenuously remind you of the importance - *for our very being. our survival and nothing less* - of wetlands, riparian habitat, water quality and the endangered and threatened species that depend on those resources.

### **Response No. IE27-3:**

This comment introduces the speaker and expresses the views of the speaker regarding issues of importance. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. The comment does not raise an environmental issue regarding the AEA and no further response is required.

### **Comment No. IE27-4:**

We've known about Climate Change since our founding in 1993 and before. Where was Five Points Corp (Newhall Land and Farming) then?

### **Response No. IE27-4:**

This comment raises the issue of climate change and poses a question regarding the Applicant. The comment does not identify a specific deficiency in the AEA analysis, which considers the impacts of the project's GHG emissions on global climate change in Section 2. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. No further response is required.

### **Comment No. IE27-5:**

This project should be moved away from the Santa Clara River, out of its floodplain and should not be filling the floodplain to redefine it according to the US Army Corps.

Filling the floodplain with 20 million cubic yards of dirt has enormous implications. It harms water replenishment and adds massively to air pollution. It's enough soil to fill 6 Great Pyramids. And that's just the fill in the Santa Clara River's floodplain and its tributaries.

**Response No. IE27-5:**

This comment suggests that the project should be moved out of the floodplain and raises concerns related to water replenishment and air pollution. Please see **Response to Comment Nos. IE15-14 through IE15-16**, which discuss identical issues, for detailed responses to this comment. Additionally, please see responses to the commenter's floodplain-specific comment letter, as provided in **Response to Comment No. IE28-1 et seq.** As discussed in the referenced responses, the issue raised in the comment is beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**) and previously was analyzed in the CDFW 2010 Final EIR without any deficiency therein subsequently identified by the courts.

**Comment No. IE27-6:**

The grading plan for the entire project would require 200 cubic yards of soil to be removed from one place and be deposited elsewhere. Let's see, that's 60 Great Pyramids!

**Response No. IE27-6:**

This comment raises concerns regarding the project's floodplain-related grading activities. Please see **Response to Comment Nos. IE15-14 through IE15-16**, which discuss identical issues, for detailed responses to this comment. The issue raised by the comment is beyond the scope of the AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**).

**Comment No. IE27-7:**

That doesn't begin to illustrate the dramatic change in the land and the impacts that would occur. But that does indicate the harm to the endangered fish in the area that is at issue here tonight.

**Response No. IE27-7:**

This comment raises concern regarding the project's impacts to endangered fish. This comment does identify a specific deficiency in the AEA. Please note that the 2010 Final EIR analyzed the project's impacts on special-status fish species in Section 4.5, Biological Resources. The referenced analysis was upheld as adequate, although two mitigation measures – BIO-44 and BIO-46 – were deemed invalid due to conflicts with Fish and Game Code section 5515. As explained in the AEA, the "No Water Contact" approach to bridge construction was developed expressly to avoid impacts to sensitive fish species, including the unarmored threespine stickleback, and eliminate the need for Mitigation Measures BIO-44 and BIO-46. The AEA fully evaluates whether and to what extent the revised construction approach will affect the aquatic environment of the Santa Clara River. (See Draft AEA, pp. 3-1 to 3-40.)

**Comment No. IE27-8:**

I've never felt better about the young people of this country and the world, who are taking Climate Change any environmental protection very seriously. Avoidance of impacts is critical. And promises that aren't kept wouldn't be an issue in that situation.

**Response No. IE27-8:**

This comment raises general issues regarding climate change. The comment does not identify a specific deficiency in the AEA analysis. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. No further response is required.

**Comment No. IE27-9:**

This project proposes "offsets" for their climate change impacts. "Offsets" are not viable as mitigation for the impacts of their projects. "Offsets" haven't worked in Europe. Cheating on "offsets" makes them unreliable

in far too many ways. And it's astounding that without thorough understanding, people simply believe the "NetZero" branding this project is applying to themselves.

**Response No. IE27-9:**

This comment raises questions regarding the use of offsets as mitigation for GHG emissions for the project and questions the project's commitment to achieve zero net GHG emissions. The comment does not provide any evidence to support its statements nor does the comment identify a specific deficiency in the AEA analysis. As discussed in the AEA, CEQA Guidelines Section 15126.4(c)(3)-(4) specifically authorizes the use of offsets to mitigate GHG emissions.

The comment raises concerns regarding the off-site GHG reductions associated with the project. Please see **Response to Comment No. 09-32** for a detailed discussion of the implementation and enforcement of the off-site GHG reductions. **Response to Comment No. 09-32** provides a broad overview of the performance standards underpinning the GHG Reduction Plan that ensure all GHG reductions used for compliance with Mitigation Measures 2-10 and 2-13 are consistent with the CEQA Guidelines Sections 15126.4(c)(3) and (c)(4) (allowing GHG mitigation by "[o]ff-site measures, including offsets that are not otherwise required" and "[m]easures that sequester greenhouse gases"). The appropriateness of using offsets as CEQA mitigation for GHG emissions is well established. The GHG Reduction Plan, through the implementation of direct reduction activities and the purchase of carbon offsets meets the requirements of CEQA, as discussed in this response and **Responses to Comments Nos. 09-32 through 09-62**.

Additionally, the AEA was subject to independent review and evaluation by two technical experts: Ascent Environmental, Inc., CDFW's consultant, and CARB. As memorialized in a letter from the CARB to CDFW, dated November 3, 2016 (a copy of which is included in Final AEA Appendix 1):

"[C]ARB staff consulted with Department of Fish and Wildlife staff and technical experts at Ascent Environmental, the principal consultant assisting the Department. In doing so, [C]ARB staff reviewed the technical documentation provided for the evaluation of the project's total estimated GHG emissions and the reductions in emissions to be achieved through the mitigation measures. Based on staff's review, [C]ARB finds the documentation provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented."

CARB's finding that the project's GHG emission reduction calculations are documented by "an adequate technical basis" is part of the body of substantial evidence that supports the AEA's GHG emissions analysis, particularly as CARB is the state agency designated with the responsibility for and expertise to implement statewide policy on global climate change and the reduction of GHG emissions.

Please see **Response to Comment Nos. 09-19, 09-24, 09-25, 09-32 and 09-56** for detailed discussion of the implementation and enforcement of the mitigation measures related to ZNE standards, EV charging stations and subsidies, the GHG Reduction Plan, and the MMRP. All elements of the mitigation measures are fully enforceable under the MMRP and the AEA's conclusion that the project will result in net zero GHG emissions is supported by substantial evidence.

**Comment No. IE27-10:**

This project needs to stay out of the wetlands and the floodplains of the river and its tributaries.

**Response No. IE27-10:**

The comment states that the project should stay out of the wetlands and floodplains located on the project site. The issue raised by the comment is beyond the scope of the AEA (see **Topical Response 1: Scope of the Additional Environmental Analysis**). Additionally, the issue previously was evaluated in the 2010 Final EIR (see Section 4.1, Surface Water Hydrology and Flood Control, and Section 4.5, Biological Resources), and



the subject analysis was not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to floodplain and wetlands issues.

**Comment No. IE27-11:**

A true American Dream protects these precious resources for us and future generations.

**Response No. IE27-11:**

This comment makes general points regarding protection of natural resources. The comment does not identify a specific deficiency in the AEA analysis. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. No further response is required.

**Comment No. IE27-12:**

By the way, Newhall Land and Fanning may have been local, with our community's interests in mind. Five Points is not Newhall Land and Fanning. And we in Val Verde know what those promises were worth and didn't deliver.

**Response No. IE27-12:**

This comment raises questions regarding the identity of the project applicant. The comment does not identify a specific deficiency in the AEA analysis. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. No further response is required.

**Comment No. IE27-13:**

Valencia's tributaries are in concrete channels.

**Response No. IE27-13:**

This comment states that Valencia's tributaries are in concrete channels. The existing community of Valencia is not located on the project site and the comment does not identify a specific deficiency in the AEA analysis. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. No further response is required.

**Comment No. IE27-14:**

(my two minutes were up or I would have said "Thank you")

**Response No. IE27-14:**

This is part of the commenter's public testimony. No further response is required. The comment does not identify a specific deficiency in the AEA analysis.

**Comment No. IE27-15:**

<http://america.aljazeera.com/articles/2015/8/25/european-climate-credits-fail.html>

A United Nations-backed carbon-trading scheme in Europe, originally meant to combat global warming, has instead resulted in the release of more than half a billion additional tons of greenhouse gases, according to a new report (link below). <https://www.sei-international.org/mediamanager/documents/Publications/Climate/SEI-WP-2015-07-JI-lessons-for-carbon-mechs.pdf>

**Response No. IE27-15:**

This comment provides a link to an article unrelated to the project regarding carbon trading in Europe. The comment does not identify a specific deficiency in the AEA analysis. Please see **Response to Comment No. IE27-9** above for relevant information that is responsive to this comment.

**Comment No. IE27-16:**

[https://en.wikipedia.org/wiki/European\\_Union\\_Emission\\_Trading\\_Scheme](https://en.wikipedia.org/wiki/European_Union_Emission_Trading_Scheme)  
Carney, Sean (28 January 2011). "EU Carbon Market Suffers Further Setback." The Wall Street Journal. According to UBS Investment Research, the EU ETS cost \$287 billion through to 2011 and had an "almost zero impact" on the volume of overall emissions in the European Union and the money could have resulted in more than a 40% reduction in emissions if it had been used in a targeted way, e.g., to upgrade power plants. [74]

<http://www.sciencetimes.com/articles/7194/20150826/carbon-trading-fails-to-reduce-greenhouse-gas-emissions.htm>

**Response No. IE27-16:**

This comment provides links to a Wikipedia entry and two articles unrelated to the project regarding carbon trading in Europe. The comment does not identify a specific deficiency in the AEA analysis. Please see **Response to Comment No. IE27-9** above for relevant information that is responsive to this comment.

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**IE28. Letter from Barbara Wampole, dated February 11, 2017**

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**Comment No. IE28-1:**

In addition to the comments I submitted yesterday (included below also) on the Newhall Ranch projects Landmark and Mission Villages I am submitting these concerns not included in my previous comments;

**Response No. IE28-1:**

The comment is an introduction to comments that follow, and does not raise an environmental issue regarding the AEA; as such, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE28-2:**

It has been a concern since the earliest review of this project that the Newhall Ranch project has proposed building housing tracts in the floodplain and floodway of the Santa Clara River which is immediately adjacent to the confluence of Castaic Creek, and directly downstream of the Castaic Dam.

**Response No. IE28-2:**

The comment expresses concern regarding the project's location in relation to the Santa Clara River, its associated floodplain, and the Castaic Dam. The issues raised by the comment are outside the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**); as such, no further response is required. Relatedly, the issues referenced were evaluated and studied in the 2010 Final EIR (see Section 4.1, Surface Water Hydrology and Flood Control; and Section 4.17, Hazards, Hazardous Materials, and Public Safety), and the subject analyses were not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to floodplain issues.

**Comment No. IE28-3:**

I will repeat here the concerns expressed over the twenty years that this project has been proposed and been opposed as proposed.

**Response No. IE28-3:**

The comment states that the project has been subject to long-standing opposition, but does not raise an environmental issue regarding the AEA; as such, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE28-4:**

In light of the emergency evacuations implemented in the past 24 hours of communities downstream of the Oroville Dam, I urge the California Department of Fish and Wildlife to take it as a personal and professional issue to reconsider allowing the building of a community, including an elementary school, directly downstream of Castaic Dam, when it is neither a financial nor a housing necessity to build in this floodplain nor this floodway!!!

We do not need to build in floodplains.

**Response No. IE28-4:**

The comment references the Oroville Dam evacuations, and requests that the project not allow development in the floodplain. Please see **Response to Comment No. IE28-2** above for relevant information that is responsive to this comment. It also is noted that the 2010 Final EIR analysis of dam failure in Section 4.17 determined that such impacts would be less than significant.

**Comment No. IE28-5:**

As can be seen by yesterday's emergency, it isn't simply seismic dangers, nor engineering failure to detect geologic problems (in the case that led to the failure of the nearby Saint Francis Dam disaster in 1928) that accompany dams, but even a weather season of heavy rain, now threatens the safety of communities when built in floodplains.

**Response No. IE28-5:**

The comment notes that seismic dangers, engineering failures, and weather can threaten the safety of communities located in floodplains. Please see **Response to Comment Nos. IE28-2 and IE28-4** above for relevant information that is responsive to this comment. It also is noted that, as discussed in Section 4.1 of the CDFW 2010 Final EIR, in order to avoid flooding impacts along the Santa Clara River, those areas of the project that are located along the Santa Clara River and proposed for development would be elevated above the existing 100-year and 50-year capital floodplains, thereby removing the development facilitated by approval of the project from flood hazards.

**Comment No. IE28-6:**

We are facing dramatic changes in weather patterns with Climate Change.

Regardless of whether the spillways and actual dams in these two situations are identical, there is no doubt, with climate change that the Castaic Dam is vulnerable to similar problems of unexpected high volumes of water and the safety of communities built downstream.

**Response No. IE28-6:**

The comment implies that, due to the effects of global climate change, Castaic Dam is vulnerable to the same problems that were experienced at Oroville Dam. Please see **Response to Comment Nos. IE28-2 and IE28-4** above for relevant information that is responsive to this comment. In addition, as discussed in Section 4.17 of the 2010 Final EIR, the Department of Water Resources has determined that the Castaic Dam (which is located approximately 8 miles upstream of the project site) is designed to resist both the maximum credible earthquake and the probable maximum precipitation flood. Further, in the event of a catastrophic dam failure, Section 4.17 explained that the limits of dam inundation would roughly follow the outline of the 100-year flood zone within the confines of the Santa Clara River bed. As explained above, the development facilitated by the project would be elevated above the 100-year flood zone.

**Comment No. IE28-7:**

As can be seen from the news report links included here, Northern California communities under evacuation were trapped on the roads due to the high volume of traffic in this evacuation. If this dam/spillway had failed, people could have been caught in the ensuing floodwaters.

[http://sfist.com/2017/02/12/compromised\\_oroville\\_dam\\_auxiliary.php](http://sfist.com/2017/02/12/compromised_oroville_dam_auxiliary.php)

<http://ktlacom/2017/02/13/pure-chaos-188000-residents-forced-to-evacuate-amid-orovilled-am-emergency/>

<http://www.latimes.com/local/california/la-live-updates-oroville-dam-20170212-htm1story.htm1>

The emergency evacuation area in Butte County included areas from Oroville Dam to Yuba City 38 miles downstream!!!

**Response No. IE28-7:**

The comment refers to various news articles regarding the Oroville Dam emergency and does not raise an environmental issue regarding the AEA; as such, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE28-8:**

Landmark Village elementary school site and nearby proposed Homestead Village are only 7 to 9 miles downstream of the Castaic Dam.

Again, I urge the California Department of Fish and Wildlife to clearly analyze the risk to downstream communities in the event of similar, formerly unprecedented, hazard that these high storm events now pose to the safety of what is proposed to be built in the floodplain of the Santa Clara River.

**Response No. IE28-8:**

The comment reiterates the commenter's request that CDFW analyze the project's flood-related impacts, after describing the proximity of certain locations of the project site to the Castaic Dam. Please see **Response to Comment Nos. IE28-2, IE28-4, and IE28-6** above for relevant information that is responsive to this comment.

**Comment No. IE28-9:**

Allowing the intact integrity of the natural communities that have for millennia evolved in this habitat and the intact integrity of the meander of the river in its floodplain and in this region are the best assurance against risks to life and property that these projects create.

**Response No. IE28-9:**

The comment states that allowing the River's natural communities to remain intact is the best assurance against risks to life and property. Please see **Response to Comment No. IE28-2** above for relevant information that is responsive to this comment. Additionally, the project's impacts to the referenced natural communities previously were studied and evaluated in Section 4.5, Biological Resources, of the 2010 Final EIR, and the subject analyses were not determined to be inadequate by the courts. This comment offers no significant new information requiring additional analysis with respect to floodplain issues.

**Comment No. IE28-10:**

And I urge you to move all Newhall Ranch projects out of the floodplain and floodway of the Santa Clara River.

**Response No. IE28-10:**

The comment reiterates the commenter's request to relocate all development out of the Santa Clara River's floodplain and floodway. Please see **Response to Comment No. IE28-5** above for relevant information that is responsive to this comment; as explained therein, the development facilitated by approval of the project would be elevated above the 100-year and 50-year capital floodplains.

**Comment No. IE28-11:**

I believe it is your personal and professional duty to consider this as a real danger to life and property as it has been to the health of our natural communities and river.

**Response No. IE28-11:**

The comment expresses an opinion regarding CDFW's personal and professional duties, and does not raise an environmental issue regarding the AEA; as such, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE28-12:**

Thank you  
Barbara Wampole.  
<http://www.buttecounty.net/OrovilleEvacuationInformationPublicInformationLine>

ImmediaJe Evacuation Order for the Following Areas: Oroville Area: Downtown Oroville and Thermalito. t areas south of Lincoln Blvd on the west side of Lincoln to Ophir Road

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“This is not a drill. Repeat this is not a drill,” the National Weather Service said Sunday, urging people living below Oroville Dam to evacuate.

More than 100,000 people were told to evacuate because of a “hazardous situation” involving the Northern California dam’s emergency spillway. At one point, the NWS warned that the auxiliary spillway was expected to fail and could send an “uncontrolled release of flood waters from Lake Oroville.” However, by late Sunday night, officials said the immediate threat bad passed because water bad stopped washing over the emergency spillway.

The mass evacuations cap a week of frantic efforts to prevent flooding as the reservoir behind America’s tallest dam reached capacity and its main spillway was severely damaged.

On Saturday, water levels rose so high that an emergency spillway was used for the first time. Officials initially believed the measure worked. But Sunday afternoon, as more water from record storms flowed into Lake Oroville, officials detected a hole in the emergency spillway and eventually ordered the evacuations.

By late Sunday, the crisis at the Oroville Dam eased somewhat, as the water level at the reservoir dropped. That halted water flow from a damaged emergency spillway that officials feared could collapse. But officials stressed that the situation ii dill dangerous and that evacuations should continue.

A failure of the emergency spillway could cause huge amounts of water to flow into the Feather River, which runs through downtown Oroville, and other waterways.

Gov. Jerry Brown issued an emergency order aimed at bolstering the state’s response to the crisis.

A list of evacuation centers can be found here.

Feb. 13, 2017, 11:02 a.m.

Lake Oroville water level declining

The chart below shows how the water level at the Oroville reservoir has been reduced over the last 24 hours.

According to a spokesman for the Department of Water Resources, water is pouring down the facility’s damaged mam spillway at a rate of about 100,000 cubic feet per second.

By 10 a.m., the lake’s water level was 4 feet lower than the emergency spillway, which suffered damage during its first ever water release over the weekend.

Union Pacific has stopped train service through cities affected by the Oroville Dam emergency.

The railroad said it is unable to run trains and provide service between Roseville, Chico and Oroville due to the risk of flooding. Trains approaching Roseville are being rerouted.

“We are watching the situation closely to determine if trains will need to be rerouted around the closures,” the railroad said.

Customers in the affected area could experience shipment delays for 48 hours or more. The Oroville Dam emergency could also affect train traffic between Oregon, Washington state and Southern California, the railroad said.

Trains were out of service between Oroville and Winnemucca, Nev., after sections of the tracks were washed out due to recent rains and flooding.

“At Union Pacific, safety is our top priority,” the railroad said. “While we will always do everything we can to recover operations, the safety of our employees and the communities we serve will always be our primary concern.”

**Response No. IE28-12:**

The comment is an article concerning the Oroville Dam emergency, and does not raise an environmental issue regarding the AEA; as such, no further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**Comment No. IE28-13:**

Dear LA County Planning Department,  
RE: the Newhall Ranch projects' tracts Mission Village and Landmark Village;  
These are the comments I submitted at the hearing in the Santa Clarita Valley plus a few additional comments;

Good evening

My name is Barbara Wampole and I'm speaking in opposition to the two agenda items #2 & # 3.

Thank you for coming to the SCV tonight.

I'm a 45 yr resident of the SCV, a founding member and vice chair of Friends of the Santa Clara River (FSCR) and a local business woman.

On behalf of the FSCR and my local community, we continue to strenuously remind you of the importance - for our very being, our survival and nothing less - of wetlands, riparian habitat, water quality and the endangered and threatened species that depend on those resources.

We've known about Climate Change since our founding in 1993 and before. Where was Five Points Corp (Newhall Land and Farming) then?

This project should be moved away from the Santa Clara River, out of its floodplain and should not be filling the floodplain to redefine it according to the US Army Corps.

Filling the floodplain with 20 million cubic yards of dirt has enormous implications. It harms water replenishment and adds massively to air pollution. It's enough soil to fill 6 Great Pyramids. And that's just the fill in the Santa Clara River's floodplain and its tributaries.

The grading plan for the entire project would require 200 cubic yards of soil to be removed from one place and deposited elsewhere. Let's see, that's 60 Great Pyramids!

That doesn't begin to illustrate the dramatic change in the land and the impacts that would occur. But that does indicate the harm to the endangered fish in the area that is at issue here tonight .

I've never felt better about the young people of this country and the world, who are taking Climate Change and environmental protection very seriously.

Avoidance of impacts is critical. And promises that aren't kept wouldn't be an issue in that situation.

This project proposes "offsets" for their climate change impacts. "Offsets" are not viable as mitigation for the impacts of their projects.

"Offsets" haven't worked in Europe. Cheating on "offsets" makes them unreliable in far too many ways. And it's astounding that without thorough understanding, people simply believe the "NetZero" branding this project is applying to themselves.

This project needs to stay out of the wetlands and the floodplains of the river and its tributaries. A true American Dream protects these precious resources for us and future generations.

By the way, Newhall Land and Farming may have been local, with our community's interests in mind. Five Points is not Newhall Land and Farming.

And we in Val Verde know what those promises were worth and didn't deliver.

Valencia's tributaries are in concrete channels.

(my two minutes were up or I would have said "Thank you").

<http://america.aljazeera.com/articles/2015/8/25/european-climate-credits-fail.htm>

A United Nations-backed carbon-trading scheme in Europe, originally meant to combat global warming, has instead resulted in the release of more than half a billion additional tons of greenhouse gases, according to a new report (link below). <https://www.sei-international.org/mediamanager/documents/Publications/Climate/SI-WP-2015-07-II-lessons-for-carbon-mechs.pdf>

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According to UBS Investment Research, the EU ETS cost \$287 billion through to 2011 and had an "almost zero net impact" on the volume of overall emissions in the European Union and the money could have resulted in more than a 40% reduction in emissions if it had been used in a targeted way, e.g., to upgrade power plants. [74]

<http://www.sciencetimes.com/articles/7194/20150826/carbon-trading-fails-to-reduce-greenhouse-gas>

**Response No. IE28-13:**

The comment is a duplicate copy of the comments set forth in Letter No. IE28. Please see **Response to Comment Nos. IE27-1 through IE27-16** for relevant information that is responsive to this comment.



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**IE29. Letter from Barbara Wampole, dated February 11, 2017**

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**Comment No. IE29-1:**

These are the comments I submitted at the hearing in the Santa Clarita Valley plus a few additional comments;

Good evening

My name is Barbara Wampole and I'm speaking in opposition to the two agenda items #2 & # 3.

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**Response No. IE29-1:**

Letter No. IE29 sets forth the same content as Letter No. IE27, with the only difference being, Letter No. IE27 is addressed to CDFW, whereas Letter No. IE29 is addressed to the Los Angeles County Planning Department. Based on these circumstances, CDFW acknowledges that the commenter submitted the same letter to both CDFW and the County of Los Angeles. As the content of the two letters is the same, please refer to **Response to Comment Nos. IE27-1 through IE27-16** for detailed discussions of the comments set forth in this letter (Letter No. IE29). No further response is required. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

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**IE30. Letter from Barbara Wampole, dated February 13, 2017**

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**Comment No. IE30-1:**

In addition to the comments I submitted yesterday (included below also) on the Newhall Ranch projects Landmark and Mission Villages I am submitting these concerns not included in my previous comments;

It has been a concern since the earliest review of this project that the Newhall Ranch project has proposed building housing tracts in the floodplain and floodway of the Santa Clara River which is immediately adjacent to the confluence of Castaic Creek, and directly downstream of the Castaic Dam.

I will repeat here the concerns expressed over the twenty years that this project has been proposed and been opposed as proposed.

In light of the emergency evacuations implemented in the past 24 hours of communities downstream of the Oroville Dam, I urge the California Department of Fish and Wildlife to take it as a personal and professional issue to reconsider allowing the building of a community, including an elementary school, directly downstream of Castaic Dam, when it is neither a financial nor a housing necessity to build in this floodplain nor this floodway!!!

We do not need to build in floodplains.

As can be seen by yesterday's emergency. it isn't simply seismic dangers, nor engineering failure to detect geologic problems (in the case that led to the failure of the nearby Saint Francis Dam disaster in 1928) that accompany dams, but even a weather season of heavy rain, now threatens the safety of communities when built in floodplains.

We are facing dramatic changes in weather patterns with Climate Change.

Regardless of whether the spillways and actual dams in these two situations are identical, there is no doubt, with climate change that the Castaic Dam is vulnerable to similar problems of unexpected high volumes of water and the safety of communities built downstream.

As can be seen from the news report links included here, Northern California communities under evacuation were trapped on the roads due to the high volume of traffic in this evacuation. If this dam/spillway had failed, people could have been caught in the ensuing floodwaters.

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The emergency evacuation area in Butte County included areas from Oroville Dam to Yuba City 38 miles downstream!!!

Landmark Village elementary school site and nearby proposed Homestead Village are only 7 to 9 miles downstream of the Castaic Dam.

Again, I urge the California Department of Fish and Wildlife to clearly analyze the risk to downstream communities in the event of similar, formerly unprecedented, hazard that these high storm events now pose to the safety of what is proposed to be built in the floodplain of the Santa Clara River.

Allowing the intact integrity of the natural communities that have for millennia evolved in this habitat and the intact integrity of the meander of the river in its floodplain and in this region are the best assurance against risks to life and property that these projects create.

And I urge you to move all Newhall Ranch projects out of the floodplain and floodway of the Santa Clara River.

I believe it is your personal and professional duty to consider this as a real danger to life and property as it has been to the health of our natural communities and river.

Thank you

Barbara Wampole.

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A list of evacuation centers can be found [here](#).

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**Response No. IE30-1:**

Letter No. IE30 sets forth the same content as Letter No. IE28, with the only difference being, Letter No. IE28 is addressed to CDFW, whereas Letter No. IE30 is addressed to the Los Angeles County Planning Department. Based on these circumstances, CDFW acknowledges that the commenter submitted the same letter to both CDFW and the County of Los Angeles. As the content of the two letters is the same, please refer to **Response to Comment Nos. IE28-1 through IE28-13** for detailed discussions of the comments set forth in this letter (Letter No. IE30). No further response is required. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

**IE31. Letter from Lynne Winner, dated February 12, 2017**

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**Comment No. IE31-1:**

Because they are paving over the flood area of our last free flowing river.

Because our failing infrastructure already has more traffic than it can handle.

Because we live in a desert and our water must be more carefully managed

Because the water they are saying they will use, has been agriculture water that is probably polluted

Because our local landfill is already subjecting residents to noxious fumes and is over capacity

Because our earth needs a place to breathe

**Response No. IE31-1:**

The comment refers to the Santa Clara River floodplain, transportation infrastructure, water supply and quality, landfill capacity, and air quality. Each of the issues raised in the comment is beyond the scope of the AEA (see **Topical Response 1: Scope of Additional Environmental Analysis**). Additionally, the project's impacts relative to each of these issues were evaluated and studied in the 2010 Final EIR (see Section 4.1, Surface Water Hydrology and Flood Control; Section 4.3, Water Resources; Section 4.4, Water Quality; Section 4.7, Air Quality; Section 4.8, Traffic; and, Section 4.20, Solid Waste Services). That prior analysis was not found to be inadequate by the courts (see **Topical Response 1: Scope of the Additional Environmental Analysis**), and this comment does not identify any significant new information that requires additional analysis of these issues. As such, no further response to this comment is required. Nonetheless, for informational purposes, please also see **Response to Comment No. 09-102** for information regarding the air quality co-benefits of the project's GHG emissions mitigation framework, and **Topical Response 4: Traffic Impact Analysis** for information regarding the 2010 Final EIR's traffic analysis and how that analysis accounted for future increases in traffic volumes on study area roadways.



### 3.1.8 Individual Letters Expressing Opposition and Support Only

During public review of the Draft AEA, CDFW received additional individual comments expressing opposition or support for the project without raising environmental issues or referencing the analysis or adequacy of the Draft AEA. As such, in accordance with CEQA Guidelines, these comments do not need specific responses. They are noted for the record and for consideration by CDFW during project review. The comments are listed in Table 3.1.8-1 below and receive the following general response:

The opinions expressed by the commenters will be considered and reviewed by decision makers. Because the comments do not raise any environmental issues or address the contents or adequacy of the Draft AEA, no further, specific response is needed.

See Final AEA Appendix 25 for original copies of letters of opposition and support listed in Table 3.1.8-1.

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter                      | Date              | Comment Number |
|--------------------------------|-------------------|----------------|
| <b>Letters in Opposition</b>   |                   |                |
| Bell, Chip (Patagonia)         | February 15, 2017 | I01            |
| Dosh, Alex                     | Patagonia         | I02            |
| Dutton, John (Patagonia)       | Patagonia         | I03            |
| Girdleston, Lynne              | February 11, 2017 | I04            |
| Houghton, Jim                  | February 11, 2017 | I05            |
| Keegan, Allison                | February 13, 2017 | I06            |
| Livingstone, Bruce (Patagonia) | February 12, 2017 | I07            |
| Lucas, Debbie (Patagonia)      | February 12, 2017 | I08            |
| McClure, Judith                | February 13, 2017 | I09            |
| Myers, Richard                 | February 12, 2017 | I010           |
| Chouinard, Malinda Pennoyer    | February 12, 2017 | I011           |
| Vincent, Charity               | February 12, 2017 | I012           |
| Wallraff, Dean                 | November 03, 2016 | I013           |
| Wallraff, Dean                 | November 03, 2016 | I014           |
| <b>Letters in Support</b>      |                   |                |
| Acosta, Steve                  | February 07, 2017 | IS1            |
| Adamick, Glenn                 | February 12, 2017 | IS2            |
| Aguero, Omar                   | February 03, 2017 | IS3            |
| Aguggenheimer, Cindy           | February 04, 2017 | IS4            |
| Alexander, Bryan               | February 03, 2017 | IS5            |
| Alexander, Peggy               | February 03, 2017 | IS6            |
| Anderson, Ron                  | February 11, 2017 | IS7            |
| Arellano, Sue                  | February 11, 2017 | IS8            |
| Arens, DeeDee                  | February 10, 2017 | IS9            |
| Arkwright, Mary                | February 3, 2017  | IS10           |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter            | Date              | Comment Number |
|----------------------|-------------------|----------------|
| Baba, Jacob          | February 11, 2017 | IS11           |
| Baker, Marina        | February 5, 2017  | IS12           |
| Bandayrel, Gibson    | February 12, 2017 | IS13           |
| Barker, Angela       | February 10, 2017 | IS14           |
| Barlog, Brittany     | February 10, 2017 | IS15           |
| Bauccio, Lois        | February 11, 2017 | IS16           |
| Bayne, Bruce         | February 12, 2017 | IS17           |
| Bebekian, Anahid     | February 10, 2017 | IS18           |
| Becker, John         | February 3, 2017  | IS19           |
| Benjamin, Robert     | February 20, 2017 | IS20           |
| Berger, Michael      | February 4, 2017  | IS21           |
| Bernaldez, Paul      | February 11, 2017 | IS22           |
| Bianchi, Rick        | February 9, 2017  | IS23           |
| Biggers, Brenda      | February 10, 2017 | IS24           |
| Blankenhorn, Chip    | February 13, 2017 | IS25           |
| Bokal, Adam          | February 12, 2017 | IS26           |
| Boole, Joni          | February 11, 2017 | IS27           |
| Bossert, David       | January 15, 2017  | IS28           |
| Bourbeau, Matthew    | February 3, 2017  | IS29           |
| Boyer, Jenn          | February 10, 2017 | IS30           |
| Brainard, Cliff      | February 3, 2017  | IS31           |
| Brazell, Stephanie   | February 6, 2017  | IS32           |
| Brown, James E.      | February 7, 2017  | IS33           |
| Buckley, Kim         | February 5, 2017  | IS34           |
| Budge, Terry         | February 5, 2017  | IS35           |
| Burke, Lisa          | February 5, 2017  | IS36           |
| Burkhart, Tim        | February 13, 2017 | IS37           |
| Burnett, Laura       | February 5, 2017  | IS38           |
| Burrows, Scott       | February 3, 2017  | IS39           |
| Cabrera, Gabriela    | February 13, 2017 | IS40           |
| Caldaronello, Leslie | February 5, 2017  | IS41           |
| Campbell, Justin     | February 7, 2017  | IS42           |
| Capistrano, Scott    | February 7, 2017  | IS43           |
| Carducci, Luciano    | February 13, 2017 | IS44           |
| Carlson, John        | February 7, 2017  | IS45           |
| Carpenter, Andrea    | February 7, 2017  | IS46           |
| Carras, Brooklyn     | February 7, 2017  | IS47           |
| Casey, Tammy         | February 10, 2017 | IS48           |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter                   | Date              | Comment Number |
|-----------------------------|-------------------|----------------|
| Casey, Timothy              | February 5, 2017  | IS49           |
| Castagnola, Robin           | February 6, 2017  | IS50           |
| Castelo, Paulina            | February 11, 2017 | IS51           |
| Catlin, Jay                 | February 7, 2017  | IS52           |
| Cecilia [last name omitted] | February 4, 2017  | IS53           |
| Chamberlain, Mark           | February 10, 2017 | IS54           |
| Chata, Mariness             | February 12, 2017 | IS55           |
| Cherney, James              | February 8, 2017  | IS56           |
| Cole, Tom                   | February 6, 2017  | IS57           |
| Combs, James R.             | February 9, 2017  | IS58           |
| Contrera, Lorna             | February 10, 2017 | IS59           |
| Cookler, Jonathan           | February 8, 2017  | IS60           |
| Cooley-Mitchell, Celestine  | February 12, 2017 | IS61           |
| Corbin, Michael             | February 11, 2017 | IS62           |
| Cox, Dean                   | February 5, 2017  | IS63           |
| Craig, Tracy                | February 2, 2017  | IS64           |
| Curtis, Katie               | February 7, 2017  | IS65           |
| Cusumano, Gary              | February 12, 2017 | IS66           |
| Dalby, Janet                | February 10, 2017 | IS67           |
| Dauber, Marc                | February 8, 2017  | IS68           |
| Davis, Alex                 | February 6, 2017  | IS69           |
| Davison, Julia              | February 10, 2017 | IS70           |
| DeHavan, Jennifer           | February 11, 2017 | IS71           |
| del Villar, Kerry           | February 3, 2017  | IS72           |
| Delband, Shahryar           | February 12, 2017 | IS73           |
| Delgado, Maria              | February 10, 2017 | IS74           |
| Deutchman, Donna            | February 11, 2017 | IS75           |
| Devine, Wendy               | February 11, 2017 | IS76           |
| Devine, Wendy               | February 12, 2017 | IS77           |
| Dhanda, Lakhbinder P.       | January 6, 2017   | IS78           |
| Dierckman, Thomas           | February 12, 2017 | IS79           |
| Dominguez, Raquel           | February 7, 2017  | IS80           |
| Donohoe, Dale               | February 12, 2017 | IS81           |
| Doris, Paul                 | February 5, 2017  | IS82           |
| Dortch, John                | February 12, 2017 | IS83           |
| Doyle, Denee                | February 6, 2017  | IS84           |
| Doyle, Erik                 | February 8, 2017  | IS85           |
| Edwards, Lesley             | February 10, 2017 | IS86           |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter                | Date              | Comment Number |
|--------------------------|-------------------|----------------|
| Eliopulos, Andrew        | February 5, 2017  | IS87           |
| Emma [last name omitted] | February 10, 2017 | IS88           |
| Ennis, Sandia            | February 13, 2017 | IS89           |
| Escobedo, Johnny         | February 6, 2017  | IS90           |
| Ewing, Vickie            | February 7, 2017  | IS91           |
| Fall, Chris              | February 11, 2017 | IS92           |
| Faulconer, Dawn          | February 10, 2017 | IS93           |
| Ferguson, Donna          | February 2, 2017  | IS94           |
| Fidelman, Jennifer       | February 5, 2017  | IS95           |
| Fish, Judy               | January 9, 2017   | IS96           |
| Floyd, Scott             | February 2, 2017  | IS97           |
| Fout, Gena               | February 3, 2017  | IS98           |
| Fox, Bruce               | February 13, 2017 | IS99           |
| Franklin, Jan            | February 7, 2017  | IS100          |
| French, Karole           | February 10, 2017 | IS101          |
| Frey, Jeanne             | February 7, 2017  | IS102          |
| Froman, Jil              | February 12, 2017 | IS103          |
| Fukumitsu, Jason H.      | February 11, 2017 | IS104          |
| Furlong, Heather         | February 11, 2017 | IS105          |
| Gallante, Lisa           | February 12, 2017 | IS106          |
| Gallaway, Terry          | February 12, 2017 | IS107          |
| Garcia, Erik             | February 8, 2017  | IS108          |
| Genchi, Andrew           | February 3, 2017  | IS109          |
| George, David            | February 11, 2017 | IS110          |
| Getikian, Zohrab         | February 5, 2017  | IS111          |
| Geyer, Pamela            | February 2, 2017  | IS112          |
| Giem, Mike               | February 4, 2017  | IS113          |
| Gillett, Allen           | February 6, 2017  | IS114          |
| Grable, Dierdre          | February 11, 2017 | IS115          |
| Graham, Amy              | February 8, 2017  | IS116          |
| Gunn, Linda              | February 2, 2017  | IS117          |
| Gunther, Janice          | February 6, 2017  | IS118          |
| Gurney, Tamara           | February 10, 2017 | IS119          |
| Hafizi, Linda            | February 12, 2017 | IS120          |
| Hagen, Kamala            | February 8, 2017  | IS121          |
| Hamid, Adnan             | February 7, 2017  | IS122          |
| Hamid, Adnan             | February 3, 2017  | IS123          |
| Hanford, Veronica        | February 2, 2017  | IS124          |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter                 | Date              | Comment Number |
|---------------------------|-------------------|----------------|
| Hanlin, Russ              | February 12, 2017 | IS125          |
| Harms, Eddie              | February 3, 2017  | IS126          |
| Hart, Katherine           | February 7, 2017  | IS127          |
| Hart, Philip              | February 7, 2017  | IS128          |
| Haugen, Mark              | February 8, 2017  | IS129          |
| Haugen, Mark              | February 5, 2017  | IS130          |
| Hay, Denise               | February 5, 2017  | IS131          |
| Hedman, Calvin            | February 2, 2017  | IS132          |
| Hernandez, Jessica        | February 13, 2017 | IS133          |
| Hicken, James D.          | February 12, 2017 | IS134          |
| Higgins, Brian            | February 11, 2017 | IS135          |
| Honadel, Tim              | February 12, 2017 | IS136          |
| Hooper, J. Troy           | February 9, 2017  | IS137          |
| Hopp, Elizabeth           | February 6, 2017  | IS138          |
| Hoshaw, Davis             | February 6, 2017  | IS139          |
| Howard, Brian             | February 10, 2017 | IS140          |
| Howard, Tranya            | February 10, 2017 | IS141          |
| Howton, Deborah           | February 3, 2017  | IS142          |
| Hucks, Daniel             | February 7, 2017  | IS143          |
| Hudson, C.R.              | February 11, 2017 | IS144          |
| Hyken, Robert             | February 2, 2017  | IS145          |
| Iam, Patrick              | February 7, 2017  | IS146          |
| Irving, Krysti            | February 6, 2017  | IS147          |
| Jamie                     | February 11, 2017 | IS148          |
| Jayaweera, Asoka          | November 04, 2016 | IS149          |
| Johnson, LeoNilda         | February 6, 2017  | IS150          |
| Jay Julien                | February 6, 2017  | IS151          |
| Katy [last named omitted] | February 7, 2017  | IS152          |
| Kimple, Lorraine          | February 08, 2017 | IS153          |
| Budge, Terry              | February 5, 2017  | IS154          |
| Kirkpatrick, Natalia      | February 10, 2017 | IS155          |
| Koegle, Brian             | February 6, 2017  | IS156          |
| Kranenmann, Zoe           | February 10, 2017 | IS157          |
| Kristensen, Ryan          | February 5, 2017  | IS158          |
| Kubinak, I Nicki          | February 11, 2017 | IS159          |
| Kuo, Nelson               | February 03, 2017 | IS160          |
| Ladd, Kristin             | February 06, 2017 | IS161          |
| Lane, Bradley             | February 2, 2017  | IS162          |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter                    | Date              | Comment Number |
|------------------------------|-------------------|----------------|
| Lane, Jeannie                | February 5, 2017  | IS163          |
| Langeveldt, Beverly          | February 10, 2017 | IS164          |
| Lara, Aharon                 | February 10, 2017 | IS165          |
| Lara, Ashley                 | February 10, 2017 | IS166          |
| Lara, Imelda                 | February 10, 2017 | IS167          |
| Lara, Paul                   | February 10, 2017 | IS168          |
| Latiolait, Tim               | February 07, 2017 | IS169          |
| Lauffer, Marlee              | February 07, 2017 | IS170          |
| Lawrence, Flo                | February 13, 2017 | IS171          |
| Lazarek, Greg                | February 6, 2017  | IS172          |
| Lebecki, Mike                | February 07, 2017 | IS173          |
| Lee, Tom                     | February 02, 2017 | IS174          |
| Lefkowitz Greber, Lauren     | February 03, 2017 | IS175          |
| Lentini, Nick                | February 07, 2017 | IS176          |
| Lavine, Matt                 | February 03, 2017 | IS177          |
| Llewelyn, Cary               | February 8, 2017  | IS178          |
| Lloyd, Cindy                 | February 6, 2017  | IS179          |
| Longarini, Glen              | February 9, 2017  | IS180          |
| Lopez, Joanna Genevieve      | February 12, 2017 | IS181          |
| Loucks, James                | February 5, 2017  | IS182          |
| Loughman, Garrett            | February 7, 2017  | IS183          |
| Lund, Erin                   | February 5, 2017  | IS184          |
| Lynde, Joanne                | February 5, 2017  | IS185          |
| Lyon, Bob                    | February 12, 2017 | IS186          |
| Maala, Karen                 | February 12, 2017 | IS187          |
| Macy, Stella                 | February 05, 2017 | IS188          |
| Malek, Shami                 | February 02, 2017 | IS189          |
| Mallick, Karl                | February 07, 2017 | IS190          |
| Malone, Regis                | February 05, 2017 | IS191          |
| Martin, Cynthia              | February 8, 2017  | IS192          |
| Masterson, Ed                | February 6, 2017  | IS193          |
| Mazzotti, Gino C.            | February 6, 2017  | IS194          |
| McKeen, Eileen               | February 11, 2017 | IS195          |
| Meinardus, Joan              | February 6, 2017  | IS196          |
| Melissa [last named omitted] | February 05, 2017 | IS197          |
| Memphis, Danny               | February 02, 2017 | IS198          |
| Menchaca, David              | February 11, 2017 | IS199          |
| Mercado, Mario               | February 08, 2017 | IS200          |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter                  | Date              | Comment Number |
|----------------------------|-------------------|----------------|
| Mercado-Fortine, Gloria    | February 11, 2017 | IS201          |
| Miller, Karen              | February 12, 2017 | IS202          |
| Milikan, Gregory           | February 02, 2017 | IS203          |
| Mills, Gareth              | February 06, 2017 | IS204          |
| Mindle, Adam               | February 08, 2017 | IS205          |
| Miyashiro, Thuc            | February 06, 2017 | IS206          |
| Montoya, Catherine         | February 04, 2017 | IS207          |
| Murphy, Kat                | February 11, 2017 | IS208          |
| Musella, John              | February 02, 2017 | IS209          |
| Myers, Denise              | February 12, 2017 | IS210          |
| Myers, Denise              | February 12, 2017 | IS211          |
| Myers, Jeff                | February 2, 2017  | IS212          |
| Narvell, Dave              | February 7, 2017  | IS213          |
| Narvell, Phyllis           | February 10, 2017 | IS214          |
| Nelson, Jane               | February 11, 2017 | IS215          |
| Novak, Brenda              | February 7, 2017  | IS216          |
| Novak, Brenda              | February 7, 2017  | IS217          |
| Nutter, Greg               | February 6, 2017  | IS218          |
| Oldhafer, Darcey           | February 6, 2017  | IS219          |
| O'Malley, Jordana          | February 10, 2017 | IS220          |
| Onuegwunwoke, Isioma       | February 2, 2017  | IS221          |
| Oosornia, Leo              | February 12, 2017 | IS222          |
| Ortega, Lisa               | February 02, 2017 | IS223          |
| Ossentjuk, David           | February 11, 2017 | IS224          |
| Paige [last named omitted] | February 06, 2017 | IS225          |
| Palmer, Doug               | February 10, 2017 | IS226          |
| Palmer, Joanna             | February 2, 2017  | IS227          |
| Pedersen, Alisa            | February 5, 2017  | IS228          |
| Pelton, Gerald             | February 9, 2017  | IS229          |
| Peters, Craig              | February 11, 2017 | IS230          |
| Phillips, Sharon           | February 12, 2017 | IS231          |
| Pierotti, Anthony          | February 8, 2017  | IS232          |
| Pierson, Audrey Ivy        | February 5, 2017  | IS233          |
| Pierson, Shellie           | February 12, 2017 | IS234          |
| Plummer, Jerry             | February 5, 2017  | IS235          |
| Pointer, Howard            | February 13, 2017 | IS236          |
| Poulsen, Cailee            | February 7, 2017  | IS237          |
| Poulsen, Peyton            | February 06, 2017 | IS238          |

**Table 3.1.8-1 Individual Commenters Expressing Opposition and Support Only**

| Commenter          | Date              | Comment Number |
|--------------------|-------------------|----------------|
| Pritikin, Maria    | February 10, 2017 | IS239          |
| Pritikin, Norton   | February 10, 2017 | IS240          |
| Pryor, Edward      | February 11, 2017 | IS241          |
| Puleo, Mark        | February 05, 2017 | IS242          |
| Quinlan, Vera      | February 13, 2017 | IS243          |
| Quon, Marv         | February 09, 2017 | IS244          |
| Raleigh, Ken       | February 12, 2017 | IS245          |
| Ramirez, Cheryl    | February 12, 2017 | IS246          |
| Ramirez, Donato    | February 2, 2017  | IS247          |
| Rasmussen, Charles | February 5, 2017  | IS248          |
| Rasplicka, Alan    | February 9, 2017  | IS249          |
| Raymond, Jake      | February 12, 2017 | IS250          |
| Reasonover, Leslie | February 09, 2017 | IS251          |
| Reckleff, Michelle | February 04, 2017 | IS252          |
| Reitz, Ronald      | February 06, 2017 | IS253          |
| Rendall, David M.  | February 6, 2017  | IS254          |
| Renno, Jason       | February 13, 2017 | IS255          |
| Rhoads, Timothy    | February 11, 2017 | IS256          |
| Rickett, Dee       | February 12, 2017 | IS257          |
| Ridnour, Jennifer  | February 10, 2017 | IS258          |
| Riles, Tom         | February 03, 2017 | IS259          |
| Roa, Marlon        | February 04, 2017 | IS260          |
| Robinson, Eric     | February 11, 2017 | IS261          |
| Robinson, Ouida    | February 05, 2017 | IS262          |
| Rodrigues, Roberta | February 12, 2017 | IS263          |
| Rosales, Jorge     | February 08, 2017 | IS264          |
| Rowe, David        | February 10, 2017 | IS265          |
| Ruffalo, Edward    | February 7, 2017  | IS266          |
| Russikoff, Tadd    | February 13, 2017 | IS267          |
| Ryusaki, Kerri     | February 03, 2017 | IS268          |
| Saenger, Gary      | February 11, 2017 | IS269          |
| Saenger, Gary      | February 11, 2017 | IS270          |
| Samstag, Donald    | February 03, 2017 | IS271          |
| Sanders, Brittany  | February 5, 2017  | IS272          |
| Saxena, Tanya      | February 06, 2017 | IS273          |
| Schutz, Jay        | February 13, 2017 | IS274          |
| Schwartz, Megan    | February 13, 2017 | IS275          |
| Sciarrino, Tracy   | February 05, 2017 | IS276          |



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| Commenter                    | Date              | Comment Number |
|------------------------------|-------------------|----------------|
| Scott, Carmen A.             | February 11, 2017 | IS277          |
| Seward, Eric                 | February 3, 2017  | IS278          |
| Seward, Susan                | February 05, 2017 | IS279          |
| Sexton, Christine            | February 2, 2017  | IS280          |
| Shaw, Alex                   | February 6, 2017  | IS281          |
| Shaw, Tracy                  | February 11, 2017 | IS282          |
| Sheeler, Susie               | February 10, 2017 | IS283          |
| Shuman, Nancy                | February 12, 2017 | IS284          |
| Sloan, William               | February 13, 2017 | IS285          |
| Smith, Rick                  | February 08, 2017 | IS286          |
| Snider, Michael              | February 08, 2017 | IS287          |
| Snider, Sherrie              | February 06, 2017 | IS288          |
| Sohikian, Arthur             | February 8, 2017  | IS289          |
| Sohikian, Ruby               | February 08, 2017 | IS290          |
| Sonderegger, Douglas         | February 12, 2017 | IS291          |
| Spencer, Caryn               | February 6, 2017  | IS292          |
| Spencer, Caryn               | February 9, 2017  | IS293          |
| Stanley, Greg                | February 3, 2017  | IS294          |
| Stanley, Jeff                | February 5, 2017  | IS295          |
| Starczyk, Nancy              | February 02, 2017 | IS296          |
| Stephen [last named omitted] | February 12, 2017 | IS297          |
| Stiller, Vicki               | February 06, 2017 | IS298          |
| Sweet, Sabrina               | February 10, 2017 | IS299          |
| M Tamaki, Kevin              | February 11, 2017 | IS300          |
| Tanner, Jim                  | February 13, 2017 | IS301          |
| Tarrant, Peti                | February 06, 2017 | IS302          |
| Tays, Brad                   | February 4, 2017  | IS303          |
| Terranova, Alma              | February 6, 2017  | IS304          |
| Terranova, Jim               | February 7, 2017  | IS305          |
| Terranova, Lisa              | February 08, 2017 | IS306          |
| Thacker, Kimberly            | February 06, 2017 | IS307          |
| Tormey, Dan                  | February 13, 2017 | IS308          |
| Vad, Larry                   | February 10, 2017 | IS309          |
| Vad, Stefany                 | February 11, 2017 | IS310          |
| Valle, Eileen                | February 12, 2017 | IS311          |
| Valle, Jesse                 | February 3, 2017  | IS312          |
| Vega, Amalia                 | February 5, 2017  | IS313          |
| Vera, Daniel J.              | February 12, 2017 | IS314          |

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| Commenter               | Date              | Comment Number |
|-------------------------|-------------------|----------------|
| Verner, Dennis          | February 11, 2017 | IS315          |
| Verner, Pamela          | February 12, 2017 | IS316          |
| Vitela-Hayashi, DeAna   | February 13, 2017 | IS317          |
| J. Wade, Kelly          | February 05, 2017 | IS318          |
| Wakefield, Adam         | February 11, 2017 | IS319          |
| Walsh, Gerard Joseph    | February 12, 2017 | IS320          |
| Walter, Hanspeter       | February 11, 2017 | IS321          |
| Warda, Peter            | February 05, 2017 | IS322          |
| Wardle, Mark            | February 08, 2017 | IS323          |
| Watson, Tony            | February 12, 2017 | IS324          |
| Weatherford, Michele    | February 05, 2017 | IS325          |
| Weichel, Neal           | February 13, 2017 | IS326          |
| White, Daryl            | February 7, 2017  | IS327          |
| Wijay, Indi             | February 10, 2017 | IS328          |
| Wijay, Morgan           | February 10, 2017 | IS329          |
| Wilk, Venessa           | February 12, 2017 | IS330          |
| Wilson, Gary and Sandra | February 12, 2017 | IS331          |
| Winn, Tonya             | February 06, 2017 | IS332          |
| Wise, Valerie           | February 03, 2017 | IS333          |
| Wiseman, Ken            | February 07, 2017 | IS334          |
| Woods, Curtis           | February 6, 2017  | IS335          |
| Wright, Ashley          | February 8, 2017  | IS336          |
| Wu, Chloe               | February 11, 2017 | IS337          |
| Yep, Jennifer           | February 5, 2017  | IS338          |
| Yep, Leadman            | February 5, 2017  | IS339          |
| Zabaglo, Judith         | February 3, 2017  | IS340          |
| Zimmer, Doris Marie     | February 12, 2017 | IS341          |
| Zimmer, Steven          | February 12, 2017 | IS342          |