

**Courtney, Betty@Wildlife**

**Comment Letter No. O10**

**From:** Marie Rumsey <MRumsey@ccala.org>  
**Sent:** Friday, February 10, 2017 4:19 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Newhall Ranch  
**Attachments:** CCA support letter-Newhall Ranch.pdf

Please see attached letter of support . Thank you, Marie

I 1



**Marie Rumsey**


Managing Director of Leg. Affairs & Government Relations

626 Wilshire Blvd., Suite 200 | Los Angeles, CA 90017  
office: (213) 416-7513 | fax: (213) 624-0858

[mrumsey@ccala.org](mailto:mrumsey@ccala.org)  
[ccala.org](http://ccala.org)



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 Facebook  Twitter

Comment Letter No. 010



February 10, 2017

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

**Re: Newhall Ranch - Comments on Newhall Ranch Draft AEA**

Dear Ms. Courtney,

Established in 1924, the Central City Association is Los Angeles' premier advocacy organization comprised of 400 members who employ over 300,000 people in the region. We recognize the critical role of new housing to promote our economy and strongly support Newhall Ranch.

As California's population grows and our economy rebounds, housing is not keeping pace. California is facing a housing crisis. We continue to have the second lowest homeownership rate in the nation. Five of the eight metropolitan areas with the lowest rates of homeownership are located here in our state. 50% of moderate-income and 100% of low-income families struggle to afford the cost of living in their local communities. The most vulnerable of them risk joining the 134,000+ Californians who are already homeless on any given night.

This crisis affects more than just residents: the state loses \$140 billion per year in output (or 6 percent of state GDP) due to the lack of affordable housing. Rents and mortgages within the reach of working families are critical to maintaining California's business competitiveness. CCA believes that California needs to increase the supply of housing options affordable to workers, so companies can compete for the talent that drives California's economy.

Newhall Ranch is a sustainable and net zero development and will deliver on California's unmet housing needs, building 21,500 new housing units at buildout. This much-needed housing will include a wide variety of prices and sizes, including affordable housing. Additionally, Newhall Ranch is an incredible investment in our region. It will create 60,000 new jobs, 11.5 million square feet of job generating uses and represents \$12.7 billion total development investment.

We are proud to strongly support Newhall Ranch and appreciate your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lall", written in a cursive style.

Jessica Lall  
President & CEO



**Comment Letter No. 011****Wildlife Newhall Ranch**

---

**From:** Craig Ebert <cebert@climateactionreserve.org>  
**Sent:** Thursday, February 09, 2017 12:11 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** Newhall Ranch Letter.pdf

Dear Ms. Courtney—

Please see the attached letter regarding the Newhall Ranch Draft AEA. Thank you for the opportunity to respond.

1

Respectfully yours,

Craig Ebert

**Craig Ebert, President**  
**Climate Action Reserve**  
601 West 5th Street, Suite 650  
Los Angeles, CA 90071  
O: 213-213-1239  
M: 202-276-2054  
Web : [www.climateactionreserve.org](http://www.climateactionreserve.org)

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[www.nacwconference.com](http://www.nacwconference.com)



Comment Letter No. 011

601 W. 5th Street, Suite 650 | Los Angeles, CA 90071  
T: (213) 891 1444 | F: (213) 623 6716  
www.climateactionreserve.org

February 8, 2017

Ms. Betty Courtney  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, California 92123

RE: Newhall Ranch (SCH No. 2000011025)

Dear Ms. Courtney:

On behalf of the Climate Action Reserve, I am writing in support of Newhall Ranch's innovative commitment to fully mitigate the net GHG emissions from the Newhall Ranch development, making it an example for climate-friendly communities in California.

2

The Climate Action Reserve is the premier carbon offset registry for the North American carbon market. Our Governing Board members include individuals from academia, government, environmental organizations and industry, including Linda Adams, former Secretary for the California Environmental Protection Agency; John Laird, California Secretary for Natural Resources; Tim Profeta, Director of the Nicholas Institute for Environmental Policy Solutions at Duke University; and Jeffrey Kightlinger, General Manager at the Metropolitan Water District of Southern California.

3

As you know, Newhall Ranch will implement a variety of on-site and off-site GHG reduction measures to support its goal of net zero GHG emissions. The Climate Action Reserve is working with Newhall to develop and implement protocols for quantifying and registering GHG reductions resulting from direct investments in off-site GHG reduction projects, such as methane capture, forest preservation and clean cookstove programs. The protocols will ensure the GHG reductions meet the requirements under CEQA for GHG mitigation. And, to ensure that these activities are undertaken in a rigorous and transparent manner, the Reserve will oversee a program where independent third parties will confirm the implementation and accurate quantification of the emission reduction activities.

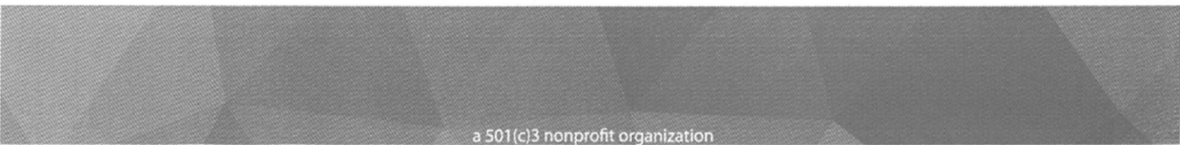
4

As the fifth largest economy in the world, California has already demonstrated that growing economically while addressing climate change is not only possible, it is a sound "win-win" investment for our future. We commend Newhall for pioneering this new greenhouse gas mitigation program and urge your support for this commitment to net zero developments.

5

Sincerely,

Craig Ebert  
President



a 501(c)3 nonprofit organization

**Comment Letter No. 012**

**Wildlife Newhall Ranch**

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**From:** Cristy Stiles <cstiles@climateresolve.org>  
**Sent:** Wednesday, February 08, 2017 6:13 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** Newhall Ranch AEA - SCH 2000011025.pdf

To whom it may concern:

Attached please find a comment letter on Newhall Ranch Draft AEA (SCH No. 2000011025). A copy is also in the mail. Please let me know if this will work and if you'll need anything else.

I 1

Best,  
Cristy

--  
Cristy Stiles  
Administrative Director, Climate Resolve  
525 S. Hewitt St, Los Angeles, CA 90013  
(213) 634-3790  
climateresolve.org



**Comment Letter No. 012**



525 S. Hewitt St.  
Los Angeles, CA 90013

213.634.3790  
climateresolve.org

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February 8, 2017

Betty Courtney  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

RE: Draft Additional Environmental Analysis (SCH No. 2000011025), Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan

Dear Ms. Courtney:

I am writing on behalf of Climate Resolve, Los Angeles' climate change organization.

Our organization enthusiastically supports Newhall Ranch Project's unprecedented commitment to reduce to net zero its construction and operational greenhouse gas emissions. This project's climate mitigation effort breaks new ground in combating climate change.

Climate Resolve is dedicated to creating real, practical solutions to meet the climate challenge in the Los Angeles area by implementing practical means of reducing greenhouse gas emissions and local air pollution, as well as preparing for climate change impacts.

As part of Newhall's effort to achieve this landmark net zero goal, Climate Resolve is partnering with FivePoint to implement energy efficiency building retrofit programs at locations across Los Angeles County. And we're happy to report that we are focusing the mitigation projects to take place in communities designated as disadvantaged by CalEPA's CalEnviroScreen. This work is central to our mission, and we're very pleased to have FivePoint standing beside us in our efforts.

Bringing greenhouse gas emissions to zero is a landmark moment for development in California and the United States. Climate Resolve appreciates this opportunity to create climate solutions that benefit low-income communities, the very communities most at risk from climate impacts.

**Comment Letter No. O12**

Given the recent changes in federal government, we view the best way to address the climate crisis right now is with local projects that directly reduce our dependence on fossil fuels and prepare the region to become more climate-resilient into the future.

It is our sincere hope that the California Department of Fish and Wildlife approves of Newhall's exemplary net zero plan.

2

Sincerely,



Jonathan Parfrey  
Executive Director

**Comment Letter No. 013**

**Wildlife Newhall Ranch**

---

**From:** Maria Finneran <mfinneran@climeco.com>  
**Sent:** Thursday, February 09, 2017 9:41 AM  
**To:** Wildlife Newhall Ranch  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** Newhall Ranch Draft Additional Environmental Analysis - SCH No. 2000011025.pdf

Please see attached for your review.

Should you have any concerns, please do not hesitate contacting me.

Regards,

Maria Finneran  
Office Administrator  
Direct Dial: (484) 480-2322

ClimeCo Corporation  
Environmental Market Solutions

Honored recipient of the **2015 PROJECT DEVELOPER OF THE YEAR** award presented by the Climate Action Reserve

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One East Philadelphia Avenue, Boyertown, PA 19512 | PH: (484) 415-0501 | FAX: (484) 363-4022 | [ClimeCo.com](http://ClimeCo.com) | [SUBSCRIBE](#) to CarbonCopy



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1

**Comment Letter No. 013**

ClimeCo Corporation  
environmental market solutions

William E. Flederbach, Jr.  
President & CEO  
[wflederbach@climeco.com](mailto:wflederbach@climeco.com)  
281-256-1108

February 8, 2017

California Department of Fish and Wildlife  
Attn: Ms. Betty Courtney  
3883 Ruffin Road  
San Diego, CA 92123

RE: Newhall Ranch Draft Additional Environmental Analysis (SCH No. 2000011025)

Dear Ms. Courtney:

On behalf of ClimeCo, I am writing in support of the Newhall Ranch project commitment to fully mitigate the project's net GHG emissions. We are excited to partner with Newhall and its parent FivePoint to explore options for developing methane capture programs at dairy farms in California. Methane capture has been recognized as an important element leading to achievement of the state's GHG reduction objectives.

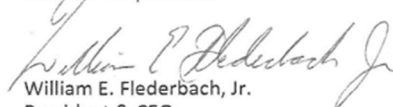
At ClimeCo, we work with our corporate and investor partners to develop and implement carbon reduction measures both at our partners' facilities and at remote sites, amplifying our mission to achieve meaningful reductions in emissions and helping to achieve the state's goals in addressing climate change. We also develop emission reduction credit strategies that help organizations realize the maximum value of their environmental assets, as well as provide a variety of compliance services regarding AB 32, including auction strategy and implementation, risk management, site-specific evaluations to mitigate CO<sub>2</sub> emissions and various transaction services.

ClimeCo holds a diverse portfolio of voluntary carbon offsets, including GHG emissions abatement system projects, commodity brokering of voluntary offsets and identification of internal reduction opportunities. For example, ClimeCo recently partnered with Chevrolet and CF Industries to reduce Chevrolet's carbon footprint and benefit future farmers in partnership with the National Future Farmers of America Foundation.

In addition, in 2015 alone, ClimeCo transacted over 5 million offsets. In total, over 15 million carbon credits have been issued by emissions abatement projects directly under ClimeCo's management. ClimeCo's current projects generate approximately 3 million offsets annually, positioning ClimeCo as the United States' leading voluntary offset producer. We look forward to the approval of the Net Zero Newhall program and the Newhall Ranch project.

Sincerely;

ClimeCo Corporation

  
William E. Flederbach, Jr.  
President & CEO

1 East Philadelphia Avenue, Boyertown, PA 19512 ph:484.415.0501 fax:484.363.4022 www.ClimeCo.com

**Comment Letter No. 014**

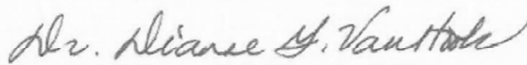
**Courtney, Betty@Wildlife**

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**From:** Dunn, Claudia <Claudia.Dunn@canyons.edu> on behalf of Van Hook, Dianne  
<Dianne.VanHook@canyons.edu>  
**Sent:** Friday, February 10, 2017 4:37 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** doc08845020170210163515.pdf

Please see attached letter of support.

I 1



Dr. Dianne Van Hook  
Chancellor  
COLLEGE OF THE CANYONS | Santa Clarita Community College District  
26455 Rockwell Canyon Road, Santa Clarita, CA 91355  
661.362.3400  
[www.canyons.edu](http://www.canyons.edu)





Dr. Dianne G. Van Hook, *Chancellor*

26455 Rockwell Canyon Road, Santa Clarita, California 91355 • (661) 362-3400 • www.canyons.edu

**Comment Letter No. 014**

February 10, 2017

Ms. Betty Courtney  
 Environmental Program Manager I, South Coast Region  
 California Department of Fish and Wildlife  
 3883 Ruffin Road  
 San Diego, CA 92123

Re: Newhall Ranch

Dear Ms. Courtney:

College of the Canyons is a two-year community college that has served the Santa Clarita Valley for more than 45 years by helping students transfer to four-year universities, teaching the skills needed for successful careers in the workforce, and collaborating with local business and industry to enhance the economic development of the region.

Our dynamic community has grown over the years, and we have worked to keep pace in meeting its evolving needs. As the local population increased, we expanded our staff and facilities to match the growing demand for access to higher education. At the same time, we partnered with local companies to provide employee training and development to ensure they remained competitive in their respective fields.

We enjoy an outstanding quality of life in Santa Clarita that is matched by few other communities in Southern California. College of the Canyons is committed to promoting the sustainable practices that ensure our community remains a desirable place to live and work for decades to come.

Our focus on sustainability is reflected in our operations, as well as our educational focus. In recent years, we have retrofitted campus lighting to use less energy, updated our heating and air conditioning systems to operate more efficiently, and added biodiversity elements to our facilities master plans that will guide future landscaping and development as we continue building and remodeling facilities on both campuses.

The plans that we have seen for Newhall Ranch match our institution's commitment to sustainability and environmental stewardship. The Net Zero Newhall initiative commits to eliminate all net greenhouse gas emissions, an impressive goal that will no doubt inspire other organizations to evaluate and enhance their own environmental practices.

As the project is developed, we look forward to learning more about it, as well as exploring partnership opportunities between Newhall Ranch and the Santa Clarita Environmental Education Consortium (SCEEC). College of the Canyons is a founding member of SCEECE, which was established to provide resources for educators and students to promote environmental literacy in the Santa Clarita Valley. Our students would benefit from learning more about the specific features included in the Net Zero Newhall Plan, including energy efficient building standards, electric vehicle charging stations, bike share programs and the planned retrofitting of public buildings in underserved parts of Los Angeles County.

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SANTA CLARITA COMMUNITY COLLEGE DISTRICT BOARD OF TRUSTEES

Michael D. Berger • Bruce D. Fortine • Michele R. Jenkins • Joan W. MacGregor • Steven D. Zimmer

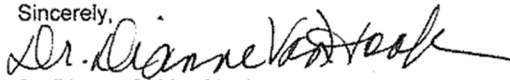
**Comment Letter No. 014**  
Page 2

Ms. Betty Courtney  
California Department of Fish and Wildlife  
February 10, 2017

We appreciate the opportunity to provide on our perspective on this project, which will mark a major step forward in the continued development of our community.

I 4

Sincerely,



Dr. Dianne G. Van Hook  
Chancellor

## Comment Letter No. 015

### Wildlife Newhall Ranch

**From:** Ryan Andre <randre@CquestCapital.com>  
**Sent:** Wednesday, February 08, 2017 12:04 PM  
**To:** Wildlife Newhall Ranch  
**Cc:** Richard Cobbs; Ken Newcombe  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** Newhall Draft Env. Analysis Support Letter.pdf

Dear Sir or Madam,

Please find attached a letter to the California Dept. Of Fish and Wildlife on behalf of C-Quest Capital.

Please let me know if you have any questions.

Best,

Ryan Andre  
 Project Coordinator  
 C-Quest Capital LLC  
 1015 18<sup>th</sup> Street NW Suite 730  
 Washington, DC 20036  
 Phone +1-202 416-2413  
 Fax +1 202 416-2439  
 E-mail [randre@cquestcapital.com](mailto:randre@cquestcapital.com)  
 Website [www.cquestcapital.com](http://www.cquestcapital.com)



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**CQuestCapital** Comment Letter No. 015

February 8, 2017

California Department of Fish and Wildlife  
c/o Betty Courtney  
3883 Ruffin Road  
San Diego, CA 92123

RE: Newhall Ranch Draft Additional Environmental Analysis (SCH No. 2000011025)


Dear Ms. Courtney:

On behalf of C-Quest Capital, I am writing in support of the Net Zero Greenhouse Gas program for the Newhall Ranch Project. This net zero initiative will reduce all of the project's construction and operational greenhouse gas emissions to zero.

We are excited to partner with Newhall to implement clean cookstove GHG reduction programs. More than three billion people globally rely on burning woody fuels over smoky three-stone fires, often cooking in poorly ventilated spaces like enclosed windowless kitchens. In addition to driving climate change and deforestation, inhaling toxic particulate matter in smoke from open fires causes more deaths of women and children than tuberculosis, malaria and HIV Aids combined. A new efficient cookstove emits an average of two tonnes less carbon dioxide per year than using a three-stone fire, while simultaneously reducing household air pollution by 50 percent and reducing the time spent gathering resources by 75 percent.

This type of partnership is central to our mission. We depend on financial commitments from entities such as Newhall to achieve our goals of transforming the lives of the poorest communities in developing countries by providing access to clean efficient energy technologies and sustainable fuels. We have developed clean cookstove programs throughout the developing world, including in Haiti, Guatemala, Mexico, Cambodia, Laos, Zambia, Nigeria and Malawi. As you review this project, we hope you will consider the many positive effects it will have on global warming and communities in need.

Sincerely,

  
Kenneth Newcombe  
CEO

2

**Comment Letter No. O16**

**Wildlife Newhall Ranch**

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**From:** Dan Silver <dsilverla@me.com>  
**Sent:** Tuesday, January 31, 2017 10:39 AM  
**To:** specialprojects@planning.lacounty.gov; Wildlife Newhall Ranch  
**Subject:** Mission and Landmark phases, Newhall Ranch

January 31, 2017

TO: Los Angeles County  
Calif Dept of Fish and Wildlife  
FROM: Dan Silver, Endangered Habitats League  
RE: Mission and Landmark phases, Newhall Ranch

Endangered Habitats League (EHL) appreciates the opportunity to submit comments on the most recent environmental documents for this proposed project. For your reference, EHL is Southern California's only regional conservation group.

I [ 1

EHL is opposed to this automobile-dependent development which is located far to close to the Santa Clara river and its sensitive habitats and species.

I [ 2

We are deeply skeptical over claims of net zero GHG emissions and do not find the proposed conditions enforceable or effective in ensuring that emissions are reduced as claimed.

I [ 3

Thank you for considering these comments.

I [ 4

Dan Silver, Executive Director  
Endangered Habitats League  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, CA 90069-4267

213-804-2750  
[dsilverla@me.com](mailto:dsilverla@me.com)  
[www.ehleague.org](http://www.ehleague.org)

**Comment Letter No. O17**

**Wildlife Newhall Ranch**

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**From:** Sean Carney <SCarney@finitecarbon.com>  
**Sent:** Wednesday, February 08, 2017 2:21 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** Finite Carbon - Newhall - California Department of Fish and Wildlife 2-7-2017.pdf

Please find Finite Carbon's attached public comment letter.

I 1

Sean Carney  
*President*



435 Devon Park Drive  
700 Building  
Wayne, PA 19087

p: 484-586-3092  
c: 415-269-2275  
[www.finitecarbon.com](http://www.finitecarbon.com)



435 Devon Park Drive  
700 Building  
Wayne, PA 19087

**Comment Letter No. O17**

p: 1-877-9-CARBON  
f: 484-586-3081

www.finitecarbon.com

February 6, 2017

California Department of Fish and Wildlife  
Attention: Betty Courtney  
3883 Ruffin Road  
San Diego, CA 92123

RE: Newhall Ranch Net Zero Greenhouse Gas Program-Resource Management and Development Plan and Spineflower Conservation Plan Draft Additional Environmental Analysis (SCH No. 2000011025)

Dear Ms. Courtney:

I am the President of Finite Carbon and I am writing in support of the Net Zero Greenhouse Gas initiative to be implemented by Newhall Ranch.

We are working with Newhall to evaluate options for implementing forest conservation GHG reduction projects in California and the United States through reforestation, avoided conversion and improved management techniques.

At Finite Carbon, we work with landowners and our partners in every step that leads to carbon reduction through forest conservation, including feasibility studies, carbon inventories, management plans and verification of afforestation. Finite Carbon has six professional foresters on staff, and received the nation's first California ARB forest carbon offsets. To date, we have developed 30 Improved Forest Management projects approved by the ARB on 1.7 million acres of US forests. We are also an active member of the Society of American Foresters, Association of Consulting Foresters, Land Trust Alliance, Forest Guild and Forest Landowners Association. We enthusiastically support the Newhall Ranch Net Zero Greenhouse Gas Program, which will set a new standard for environmental responsibility in California.

2

Sincerely,

Sean Carney  
President

**Comment Letter No. 018**

**Courtney, Betty@Wildlife**

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**From:** Stacey Chiang <SChiang@humanityca.org>  
**Sent:** Friday, February 10, 2017 1:02 PM  
**To:** Wildlife Newhall Ranch  
**Cc:** 'Don Kimball'; 'Sandy Sanchez'; Hunt Braly (HBraly@pooleshaffery.com); Donna@DeutchmanDev.org  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** Habitat SFSCV- Newhall Ranch.pdf

Dear Ms. Courtney,

Please find attached a letter from Habitat for Humanity San Fernando/Santa Clarita Valleys regarding Newhall Ranch.

1

Thank you

*Stacey Chiang*  
*Executive Administrator and Grant Writer*  
Habitat for Humanity SF/SCV  
21031 Ventura Blvd., Suite 610  
Woodland Hills, CA 91364  
O- 818.884.8808  
F- 818.884.8838

[www.HumanityCA.org](http://www.HumanityCA.org)



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Comment Letter No. 018



February 9, 2017

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

Re: Newhall Ranch

Dear Ms. Courtney,

Habitat for Humanity San Fernando/Santa Clarita Valleys' (SF/SCV) mission is to build affordable homes for low-income civilian and veteran families, and provide services that empower them to build brighter futures as homeowners. We are currently building 78 homes in Santa Clarita for low-income veterans and their families. As an affordable housing builder dedicated to providing homeownership to low-income families, we recognize the critical need for self-sufficiency, first-time homebuyer education, and sustainability. We are also committed to well-building and environmentally appropriate design with ample open space.

2


It is our understanding that Net Zero Newhall, to be delivered by FivePoint in Newhall Ranch, will create more than 20,000 homes in Santa Clarita using innovative green building practices, protecting 10,000 acres of open space, and reducing or mitigating all net greenhouse gas emissions from the project and its construction to zero. "This much-needed housing will include a wide variety of prices and sizes, including affordable housing."

3

Habitat for Humanity SF/SCV stands as an affordable housing advocate and recognizes the need for more affordable housing in the Santa Clarita Valley that produces jobs, preserves open space, and is sustainable. We applaud your efforts.

4

Sincerely,

  
Donna Deutchman, CEO  
Habitat for Humanity SF/SCV

CC: Don Kimball  
Sandy Sanchez  
Hunt Braly

21031 Ventura Boulevard, Suite 610 | Woodland Hills, CA 91364  
(818) 884-8808 | (818) 884-8838 (fax) | www.HumanityCA.org



Comment Letter No. 019



January 6, 2017

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

Re: Mission Village

Dear Ms. Courtney:

Henry Mayo Newhall Hospital is a non-profit community hospital and trauma center that has served the Santa Clarita Valley for more than four decades. The health of our institution and the people we serve is closely tied to the health of our community, so we are deeply invested in the long-term prosperity and well-being of the Santa Clarita Valley. For this reason, we give our strong support to Five Point's plans for Newhall Ranch and the Net Zero Newhall initiative.

1

Newhall Ranch is a far-sighted, master-planned community that will add tremendous vitality to the Santa Clarita Valley by creating 11.5 million square feet of new office, retail and other commercial space, adding tens of thousands of jobs to our region. A strong economy and steady employment growth supports high quality and comprehensive health care in our region.

Additionally, our community's need for a wide range of housing, including affordable, will be eased by the development of up to 21,500 homes. And, the substantial tax revenue to come from this project, totaling more than \$800 million a year at build out, will greatly aid the public services that our hospital depends on, such as paramedic and emergency services.

2

As a promoter of public health, we appreciate Newhall Ranch's numerous contributions to healthy lifestyles. This includes creating a walkable community, much like Valencia, with an active bike share program. We also applaud the preservation of two-thirds of the community's total area as open space — some 10,000 acres — as well as 50 miles of public trails and a nature preserve totaling nine square miles, funded in perpetuity by a \$13 million endowment.

Finally, the Net Zero Newhall initiative sets an encouraging new standard of environmental responsibility by committing to eliminate all net greenhouse gas emissions, a leading cause of global climate change. This is an impressive commitment that will help spur the adoption of numerous green technologies in the Santa Clarita area, including zero-emission electric vehicles, which will help reduce air pollution and improve respiratory health in the area.

(661) 253-8000 | [www.henrymayo.com](http://www.henrymayo.com) | 23845 McBean Parkway | Valencia, CA 91355-2083

**Comment Letter No. 019**

Ms. Betty Courtney — Re: Newhall Ranch  
January 6, 2017  
Page 2

We have long-standing relationships with many of the Newhall Ranch project leaders at Five Point stemming from their successful work on Valencia. This is a talented professional team, and thanks to their efforts we have full confidence that Newhall Ranch will prove to be an enduring contribution to a healthier Santa Clarita Valley.

|  
| 2 |  
|

Sincerely,



Roger E. Seaver, FACHE  
President and CEO

RES:mr

**Comment Letter No. O20**

**Wildlife Newhall Ranch**

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**From:** Olivia Lee <OLee@lachamber.com>  
**Sent:** Monday, February 13, 2017 12:49 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Comments on Newhall Ranch Draft AEA  
**Attachments:** 2.13.17\_Five Points - Newhall Ranch.pdf

Hello Ms. Courtney,

Please see attached for the letter of support for the Newhall Ranch from the Los Angeles Area Chamber of Commerce.

1

Thank you,  
Olivia Lee

**Olivia Lee** | Manager, Public Policy  
**LOS ANGELES AREA CHAMBER OF COMMERCE**  
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**Comment Letter No. O20**



LOS ANGELES AREA  
CHAMBER OF COMMERCE

February 13, 2017

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

**Re: Newhall Ranch**

Dear Ms. Courtney,

On behalf of the Los Angeles Area Chamber of Commerce, which represents more than 1,650 organizations and 650,000 employees in the region, I am writing to express our thoughts and support for the Landmark Village and Mission Village developments.

Landmark Village and Mission Village, as part of Newhall Ranch, will be an asset to our community through economic development and housing for the community while working to lower greenhouse gas emissions for the region. The Newhall Ranch Community, at buildout, will create 60,000 new and permanent jobs, generate \$388 million in property taxes, and \$410 million in income taxes. Newhall Ranch will also create 11.5 million square feet of job generating uses, which will help the region thrive economically.

Housing is an ongoing issue in Los Angeles and in the state, especially housing that is affordable and conveniently located for residents. With this new development, residents can enjoy living and working in the same community, eliminating the need for long commutes which leads to higher quality of life.

The Newhall Ranch Community is focused on preserving open spaces and lowering greenhouse gas emissions through the use of sustainability-friendly materials and state of the art energy efficient designs. With this in mind, 10,000 acres of the 15,000 acres of the community will be designated as open space for the community to enjoy, which will be preserved by the \$13 million endowment made by Net Zero Newhall. Only one third of the entire property will be developed. In addition, this community embrace sustainability by including solar panels and electrical charging stations in the residences.

Newhall Ranch's ambitious plan to build a community of this size while fostering economic growth and promoting sustainability is the first of its kind and will serve as a model for years to come. The Chamber supports the development and believes this is a great opportunity to create economic growth and housing while making a positive impact on our environment.

Sincerely,

Gary Toebben  
President & CEO

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**Comment Letter No. 021**

**Wildlife Newhall Ranch**

**From:** mleslie@labusinesscouncil.org@mg.netzeronewhall.com on behalf of Mary Leslie  
<mleslie@labusinesscouncil.org>  
**Sent:** Monday, February 13, 2017 3:37 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Newhall Ranch

Ms. Courtney:

On behalf of the Los Angeles Business Council (LABC), I'm writing to give my strong support for the Newhall Ranch project. The LABC represents over 400 member businesses in the greater Los Angeles area working to promote economic and environmental sustainability. This project has many features that we are enthused about. This project will bring many good things to the community, both environmentally and to the local business community. When the full Newhall Ranch community is complete, it will have created 60,000 new jobs, 21,500 homes, and hundreds of millions in tax revenue every year. Bringing more people to the area means more patrons for local businesses, and an ample supply of housing to attract new industries. Bringing jobs closer to where people live can also ease traffic, which is a known drain on productivity. A major driver of our support is Newhall's commitment to curbing greenhouse gas emissions by developing a net zero community. As we move forward to achieve California's

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Respectfully,  
Mary Leslie

**Comment Letter No. 022****Wildlife Newhall Ranch**

**From:** Peter Herzog <peter@talleyassoc.com>  
**Sent:** Monday, February 13, 2017 2:16 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Newhall Ranch Draft AEA  
**Attachments:** CDFW2-13NewhallLett .pdf

Dear Ms. Courtney:

Attached are comments NAIOP SoCal wants to introduce into the record regarding the Newhall Net Zero project. Thank you for considering our comments.

1



Peter Herzog, Assistant Director of Legislative Affairs  
NAIOP SoCal  
Commercial Real Estate Development Association  
25241 Paseo de Alicia, Suite 120  
Laguna Hills, California 92653

Phone: (949) 380-3300  
Facsimile: (949) 380-3310  
Email: peter@talleyassoc.com

Please visit the SoCal Legislative Update at [www.naiopsocal.org](http://www.naiopsocal.org)

The NAIOP SoCal Chapter represents commercial real estate professionals in Orange and Los Angeles Counties.

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Comment Letter No. 022



February 13, 2017

Ms. Betty Courtney  
 Environmental Program Manager I, South Coast Region  
 California Department of Fish and Wildlife  
 3883 Ruffin Road  
 San Diego, CA 92123

Sent via email  
[newhallranch@wildlife.ca.gov](mailto:newhallranch@wildlife.ca.gov)

**Re: Comments on Newhall Ranch Draft AEA**

Dear Ms. Courtney,

NAIOP, the Commercial Real Estate Development Association, is the leading national organization of developers, owners, and related professionals in office, industrial and mixed-use real estate. NAIOP advances responsible commercial real estate development, researches trends and innovations, and advocates for effective public policy. The NAIOP SoCal Chapter serves Los Angeles and Orange Counties and is the third largest chapter in the United States with a membership of over 1,000 members.

Newhall Ranch is a mere eight miles from the City of Los Angeles boundary, the Santa Clarita Valley is an economic engine in its own right. The area is home to 90,000 jobs – with 3,000 jobs created just in 2015 – in diverse sectors including biotech, technology, entertainment, healthcare and aerospace. Having more than 30 million square feet of job-generating space, it also falls within the entertainment studios' Thirty-Mile Zone, fostering film and television production in the area with 17 sound stages in Valencia alone.

FivePoint's Newhall Ranch development will create 11.5 million square feet of job generating uses at buildout and generate thousands of permanent jobs, as well as temporary construction jobs, helping the Santa Clarita Valley continue to thrive economically and allowing families to live close to their work.

The lack of housing in the Los Angeles region is well known. There is no question a substantial increase in the amount of quality housing is vitally important to the future of Los Angeles and the quality of life of its people. The Net Zero Newhall project will clearly assist in addressing the need for more housing.

Building a master-planned community of this size and fostering economic growth – without increasing greenhouse gas emissions – represents a model for sustainable master-planned communities and a true legacy project for

www.naiopsoacar.org

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 Clark Welton, EY

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**NAIOP SoCAL EXECUTIVE STAFF**  
 Cynthia G. Fusco, Executive Director  
 Vickie Talley, Director of Legislative Affairs

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Chapter Office: 2900 Bristol St., Ste. G-105, Costa Mesa, CA 92626    Tel: (714) 979-9131    Fax: (714) 979-0403  
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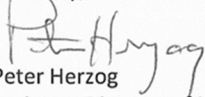


**Comment Letter No. O22**

California and beyond. Net Zero Newhall will continue to expand business attraction and employers to the region significantly adding to the regional economy.

NAIOP SoCal supports this job creating development that will also ease the housing crisis by adding much needed supply to help meet the demand.

Sincerely,



Peter Herzog  
Assistant Director of Legislative Affairs

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**Comment Letter No. O23**



Joel Levin  
Plug In America  
6380 Wilshire Blvd., #1010  
Los Angeles, CA 90048

February 10, 2017

California Department of Fish and Wildlife  
Comments on Newhall Ranch Draft AEA  
c/o Betty Courtney  
3883 Ruffin Road  
San Diego, CA 92123

RE: Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan Draft Additional Environmental Analysis (SCH No. 2000011025)

Dear Ms. Courtney:

On behalf of Plug In America, I am writing in support of the following mitigation measures which are included in the Draft Additional Environmental Analysis:

1. Mitigation Measure 2-4: Residential Electric Vehicle Chargers and Vehicle Subsidy
2. Mitigation Measure 2-5: Commercial Development Area Electric Vehicle Chargers
3. Mitigation Measure 2-12: Off-Site Electric Vehicle Chargers

These measures are consistent with Plug In America's recommendations to the general public with respect to electric vehicle charging infrastructure.

Plug In America is also in support of the plug-in electric vehicle (PEV) component of the Net Zero Newhall Initiative. A major component of Net Zero Newhall is its commitment to PEVs and the infrastructure to support their widespread adoption and use. As publicly announced, this will include:

- An electric vehicle charging station in every home;
- 2,000 electric vehicle charging stations in Newhall Ranch commercial and community areas;
- 2,000 additional offsite charging stations in strategic L.A. County locations;
- Subsidies for converting public transit buses to electric buses; and
- An electric school bus program within Newhall Ranch.

We are pleased that FivePoint has also engaged our expert advisement regarding appropriate electric vehicle infrastructure for the Newhall project, including best practices for implementing home, workplace and public charging. Installing charging infrastructure on the scale Newhall proposes would no doubt benefit PEV drivers while also driving PEV adoption community-wide. If implemented as proposed by Plug In America, this initiative would represent a deep and broad commitment to support electric vehicle use at Newhall Ranch and around Los Angeles County.

Plug In America is the leading American voice promoting the use of plug-in electric vehicles. We are a coalition of PEV drivers led by leading experts in transportation electrification. Plug In America represents the world's deepest pool of experience of actually driving and living with PEVs. We help consumers, policy-makers, auto manufacturers and others to understand the powerful benefits of driving electric. We provide practical, objective information to help consumers select the best plug-in

**Comment Letter No. O23**

vehicle for their lifestyles and needs. Increased use of electric vehicles is one of the best methods of reducing criteria pollutant and greenhouse gas emissions, a major driver of climate change. Our work is consonant with the stated goals and strategies of the State of California.

For all of these reasons, we applaud this effort as an important step in accelerating the state's shift to vehicles powered by clean, domestic electricity. FivePoint has publicly committed to make this the most EV-friendly development in California history – and a model for future projects. As the national consumer voice for electric vehicles, we are excited to work with them to make that a reality. Plug In America enthusiastically supports FivePoint's plans to integrate electric vehicle infrastructure into their proposed project.

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Thank you for your consideration of our comments. We hope they will contribute to the Department of Fish and Wildlife taking favorable action on the proposed project.

Sincerely,



Joel Levin  
Executive Director  
Plug In America

**Comment Letter No. 024**

**Courtney, Betty@Wildlife**

**From:** Carla Bollinger <Carla.Bollinger@halo.com>  
**Sent:** Monday, February 13, 2017 6:16 AM  
**To:** Wildlife Newhall Ranch  
**Subject:** Mission Village and Landmark Village Projects - Newhall Ranch Comment Letter



February 12, 2017

Re: Mission Village and Landmark Village Projects –State Permits for Newhall Ranch

California Fish and Wildlife Department  
 newhallranch@wildlife.ca.gov

Public Land Alliance Network (PLAN) is protesting the developments, Mission Village and Landmark Village, for numerous reasons:

- Mission Village will be built over a closed oil field. This is a dangerous situation with the airborne VOCs that will leak into the homes as historically been the case throughout former closed oil field sites. The Porter Ranch massive gas leak, the worst in USA history, is an example of the deleterious results of building on former oil fields.

- Santa Clarita’s explosive population growth in the last two decades has made it the third largest city in LA County. Loss of open space, unchecked developments, has created a Hwy 5 – Hwy 14 commuter traffic clog with unbearable extended travel times. To ignore this traffic congestion choke-hold in supporting the Mission Village and Landmark Village with 21,000 planned units, is irresponsible planning. These traffic conditions are not just statistics; for those subjected to this daily work commute, it compounds an already intolerable situation. The exclusion of addressing the traffic analysis is unacceptable.

- Santa Clarita is a high-desert eco-system with spiked summer heat-winds, certain increased GHG caused by excessive growth, coupled with the loss of open space in a river flood-plain, and cluster-housing contamination issues alongside the Santa Clara River is not smart growth.

- This development, as proposed, will have negative impact on the Santa Clara River as it flows through the Ventura County to the Pacific Ocean, wildlife, plant-habitat in the regional wildlife movement between the Santa Susana Mountains and the Los Padres National Forest in the Rim of the Valley wildlife corridor. The two developments need to be reconfigured: Moved back away from the river floodplain, to not have the filling of 200 million cubic yards of dirt, scaled back in size, so as not to be a detriment to the health of humans.

- Endangered Status: Spineflower, threespine stickleback fish, steelhead trout, least Bell’s vireo, western yellow-billed cuckoo and the southwestern willow flycatcher are all California State and/or Federal Endangered status. The diminished riparian habitat for the southwestern willow flycatcher is significant because of their role in controlling insect populations. The Santa Clara River is one of five breeding grounds for the western yellow-billed cuckoo. Mitigation cannot save these Endangered species, this is a choke-point were one more loss of habitat can end this species’ existence.

Thank you for reviewing these comments and consideration in readdressing these serious concerns for a challenged riparian eco-system that supports the well-being of humans, wildlife, native plants in Santa Clarita/Los Angeles County and throughout Southern California.

Sincerely,

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**Comment Letter No. O25**

**Courtney, Betty@Wildlife**

---

**From:** lynnep1@juno.com  
**Sent:** Monday, February 13, 2017 5:47 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Newhall Ranch Comments  
**Attachments:** SCOPE FWNewhallCFW Comment Letter.pdf; Exh 1 nrsp-May2003- landuse table.pdf;  
Exh 2 Maps extent of Plume-Production wells.pdf; Exh 3 - 2015 Alluvial Aquifer  
Production Achievability Evaluation by GSL... (1).pdf

Comment letter and 3 attachments  
Lynne Plambeck  
Santa Clarita Organization for Planning and the Environment

I 1

Comment Letter No. 025

**SCOPE**

**Santa Clarita Organization for Planning and the Environment**

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



2-12-17

California Department of Fish and Wildlife  
Comments on Newhall Ranch Draft AEA  
c/o Betty Courtney  
3883 Ruffin Road  
San Diego, CA 92123

Re: Newhall Ranch AEA  
*Sent via email, Feb 13<sup>th</sup>, 2017*

Dear Ms. Courtney:

Santa Clarita Organization for Planning and the Environment (SCOPE) is a 30 year old local watershed group that focuses on planning and conservation issues in the Santa Clarita Valley. We have participated in the various permitting processes for this project since its inception and are very familiar with the project itself and the impacts it will have on our valley.

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We join with other groups and individuals in stating these concerns, and incorporate by reference the comments made by other conservation groups, agencies and individuals that have submitted comments expressing concerns in these areas.

We begin by asking why the Agency chose to not post or at least reference a link to the previous EIR document, completed seven years ago in 2010, on the website where these documents are stored. While we did find a link buried in the EIR, not having a link on the document site, makes it difficult for the public to find, review and compare what was said in the previous document to the new document, or review the current document for missing data that was available in the previous document. We ask that your agency post such a link prior to the final response to comments.

3

**Process**

We assert that it was improper to submit an Additional Document for review with only two chapters included. The reason for this is that one cannot determine the extent or accuracy of the greenhouse gas production that will be created by this project, and thus adequately develop mitigation measures without including chapters on traffic, air quality, water supply, solid waste, water service and utilities.

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Controlling greenhouse gases and traffic congestion are intimately related. Traffic congestion in the Santa Clarita area, particularly on the I-5 and 14 freeways has increased substantially since this project was reviewed in the 2010-2011 time period. The HOV lanes are not reducing traffic at peak hours, leaving motorist idling their engines even in those lanes for substantial amounts of time. The considerable traffic generated by new commuters from this project will add to the

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SCOPE Comments on the Newhall Ranch River Alteration Permit **Comment Letter No. 025**

standstill and generate additional pollution by its impact on slowing other drivers as well as the pollution it will create from the project's own predicted 357,000 trips per day at build out.

Residents are not remaining in the Valley to work as predicted by Newhall Land's numerous EIRs on the many projects in the Santa Clarita Valley, as well as the previous iteration of this document. (We hereby include by reference and refer to the previous document for this project which is available and held at the Agency's offices.) According to this document, traffic modeling is still based on the Santa Clarita Valley Consolidated Traffic Model 2004 Update and Validation (March 2005)<sup>1</sup>. This document is now twelve years old, and observably inaccurate. A new evaluation of traffic generation on current traffic patterns is required to rectify what was obviously an underestimate of the length of commutes in the previous document. A chapter updating the traffic analysis must be added.

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An air quality chapter should be added to ensure that methane generation and CO2 precursors from the added uses of these new residents is properly accounted for in the GHG inventory.

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Water supply and utility chapters should be included due to the creation of greenhouse gases involved with moving water, treating sewage, (including treating to remove salts where a new 2015 proposal will require trucking of wastes to an ocean outfall pipe line for the first 6000 units<sup>2</sup>. Not only will this generate additional greenhouse gases from truck that must be included in the GHG inventory, but also, changing to this up gradient location will require pumping stations that run on electricity or another fossil fuel generated source to move the considerable amount of sewage uphill for treatment instead of the gravity fee plan initially envisioned.

7

If it is not derived from a clean source, production of electricity generates green house gases. Natural gas used for heating and cooking in all these future homes, will generate greenhouse gas.

However, we cannot know how much or if the impacts were properly calculated because a utility chapter is not even included in the document.

Table 1  
Chiquita Canyon Landfill  
Landfill Gas Collection Efficiency

Year	LandGEM <sup>1</sup> (standard cubic feet per minute)	Adjusted LandGEM <sup>1</sup> (standard cubic feet per minute)	Actual Flow (standard cubic feet per minute) <sup>2</sup>	Collection Efficiency (%)
2001 – 2002 <sup>3</sup>	2,913	2,870	2,748	95
2002 – 2003 <sup>3</sup>	3,216	3,169	3,348	105
2006 <sup>3</sup>	4,133	4,071	3,955	97
2007 <sup>3</sup>	4,423	4,358	3,851	88
2008 <sup>3</sup>	4,710	4,640	3,831	78
2009 <sup>3</sup>	4,981	4,907	3,789	77
2010 <sup>3</sup>	5,049	4,974	3,784	76
2011 <sup>3</sup>	5,212	5,135	3,968	77
2012 <sup>3</sup>	5,431	5,351	4,161	78
2013 <sup>3</sup>	5,548	5,465	4,088	75
2014 <sup>3</sup>	5,685	5,603	3,983	71

Solid waste generated from this project will be placed in a landfill, that, if it is complying with the law will still have 15% fugitive methane (now a regulated GHG) releases. If it is not, it may have even greater releases such as Chiquita Canyon has now<sup>3</sup>. The methane releases from garbage generated by the future residents of this project were not calculated and cannot be estimated since there is no solid waste chapter included in the document.

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<sup>1</sup>Draft Additional Environmental Analysis, page 2-19

<sup>2</sup> This is a changed circumstance. Previous EIRs relied on the Newhall Ranch Sanitation Plant. However, after the previous iteration of this EIR was completed, it came to light that Newhall Ranch will use the existing Sanitation Plant for sewage treatment of its first 6000 units. As noted above this will change energy requirements and add truck traffic. We include by reference, the FEIR for this project, which can be viewed at this link: [http://www.lacsd.org/wastewater/chloridefacplaneir/final\\_santa\\_clarita\\_valley\\_sanitation\\_district\\_chloride\\_compliance\\_facilities\\_plan\\_and\\_eir.asp](http://www.lacsd.org/wastewater/chloridefacplaneir/final_santa_clarita_valley_sanitation_district_chloride_compliance_facilities_plan_and_eir.asp)

<sup>3</sup> Golder Associates Report, Oct. 1, 2016, Appendix H-4, Chiquita Canyon Landfill SEIR, [http://planning.lacounty.gov/assets/upl/case/project\\_r2004-00559\\_deir-appendices.pdf](http://planning.lacounty.gov/assets/upl/case/project_r2004-00559_deir-appendices.pdf)

SCOPE Comments on the Newhall Ranch River Alteration Permit **Comment Letter No. O25**

**Newhall’s Claim of No Increase to GHG from their project.**

Newhall claims that they will reduce greenhouse gases to net zero through mitigation and offsets. We believe this claim is patently absurd. While mitigation such as charging stations in homes, etc., are needed improvements, they will not verifiably reduce GHG generation to net zero for this huge project where no transportation other than autos and buses is available. Based on current ridership in the Santa Clarita Valley, it is highly unlikely that residents of Newhall Ranch will avail themselves of bus transportation due to the inconvenience and travel time. We believe that Newhall must produce a study showing that buses would reduce auto use in this project.

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For instance, there is no guarantee that homeowners will use electric vehicles, nor could homeowners be forced to purchase them. While a small subsidy is certainly a carrot towards this outcome, it is unlikely that a \$1000 subsidy, a small percentage of the total cost of any new electric vehicle, (for 50% of the homeowners) is something of which new owners would be financially able to avail themselves. This is not a verifiable reduction. Also, charging stations are proposed for only one space, so how will that bring GHG levels back to the required 1990 level when half or more residents will admittedly not be driving EVs, if even that many.

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Purchasing climate credits that will ostensibly buy solar stoves in Africa is also unverifiable and does nothing to improve our local GHG generation as required for California, far less improve our local air quality for ozone and Nox, GHG precursors for which our area currently does not meet federal standards. This is not an acceptable mitigation. While offsets that occur in the Los Angeles basin might be acceptable if they can be verified, (and while we concur it would help Africa to have solar stoves), the current proposal will not reduce local and statewide impacts and so is not acceptable.

13

The environmental document fails to provide a complete inventory of GHG generation due to missing analysis sections as cited above. As noted above, traffic patterns are presently greater than what Newhall claimed they would be in previous documents, thus causing the generation of more GHG as vehicles idle in traffic. Newhall Ranch will make this far worse, but these impacts were not included.

14

We suggest that a real, verifiable and acceptable mitigation would be to reduce the size of the project as well as including the proposed mitigation in this document as a requirement of approval.

**Inaccurate baseline**

When the Newhall Ranch Specific Plan was approved in 2003, the approved unit number was 21,308 (Table attached as Exhibit 1). The table 1.2.1 on page 1-6 includes only 19, 517 units and adds another 1725 for the Entrada projects which were not included in the Specific Plan. While, it is our understanding that some units were removed from the Landmark project in the last review, to our knowledge it was NOT the nearly 2000 units indicated by this table. Please explain this discrepancy. Was it also incorrect in the previous document?

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If this housing inventory is incorrect, than the GHG generation figures are also incorrect. Even if it was incorrect in the previous document, this is the next administrative approval and the information must be corrected now.

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SCOPE Comments on the Newhall Ranch River Alteration Permit **Comment Letter No. O25**

The table also does not disclose impacts from the approximately 11 million sq ft of commercial that will be included as part of this project. Nor does it apparently include GHG generation from these uses in the inventory, stating instead that “Project-related emissions of GHGs from the non-residential energy sector (i.e., electricity and natural gas) would be substantially reduced through implementation of Mitigation Measure 2-2. Through incorporation of zero-energy technology into all non-residential development associated with the project, as prescribed by a qualified energy efficiency and design consultant, fossil fuel-related sources of GHGs associated with energy use would not occur from project-related activities.” (page 1-11) However the previous paragraph says that this will be accomplished by providing a Zero Net Energy Confirmation Report (ZNE Report) by a “qualified engineer”, and further states that “**A ZNE Report may, but is not required to**” make several conditions to the permit approvals. This highlighted language is NOT enforceable, and based on our previous experiences with the County permitting process, will result in the conditions being ignored in favor of the developer.

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We therefore believe that unless all such language found in the mitigation proposals is changed to “*Shall*” and “*is required to*”, this is not an enforceable mitigation. The word “independent” should also be included as a requirement for any consulting engineer or biologist or other consultant employed on the project. Further through a previous experience that required the County of Los Angeles to forbid confidentiality agreements with consultants, the county prohibits confidentiality agreements with project consultants. Such agreements should also be formally precluded in these project mitigations and their prohibition made clear in all mitigation measures. *We do not believe that these mitigation measures will be enforceable without such language, based on past experience, and thus they will not serve to reduce future GHG as required.*

21

The table in Section 2.1.1, page 34 notes a baseline of 3,790 metric tons of Co2 associated with methane from oil wells and 3,682 MT from energy use associated with oil wells. This figure is calculated according to Table A-2 (Appendix A) using 59 active wells and an average aggregate production rate of 10, 950. We note that all wells on the Mission Village tract have been closed for many years and closure reports were included in the last EIR. After viewing on Google Earth satellite images dated of the project area (dated Oct. 16, 2016), we can identify only around 28 oil pump jacks in the area North of Mentryville (Pico Canyon). We can’t tell from a stationary view whether they are still operating. That is half the amount used in the Appendix A report to calculate baseline. An accurate and verifiable well inventory should be used to provide a baseline generation calculation. Please provide an independent source to verify active oil wells and oil production for this baseline calculation.

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We also note that Newhall did not calculate the carbon sequestration that will be lost through the destruction of existing vegetation, especially oaks and other trees. We believe this information should have been in the ADA

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**Changed Circumstances Requiring Further Review**

**Honor Rancho Gas Storage Facility and Thewlis Canyon Disaster**

The recent catastrophic failure of the gas well at Aliso Canyon brought to our attention that a similar facility exists near the current project, the Honor Rancho Gas Storage Facility. To our knowledge this facility was not disclosed in the Hazards section of the previous EIR and should

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SCOPE Comments on the Newhall Ranch River Alteration Permit **Comment Letter No. O25**

be disclosed now. One of the reasons for the failure at the Aliso Canyon site was a substantial increase in pressure in order to store more natural gas. Will the approval of 21,000 housing units impact gas storage in this facility? Have methane leaks from this facility been considered in the GHG inventory? How far does the underground storage area itself extend?

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**Water Supply**

In the last 6-7 years since the full EIR review of this project was completed several new impacts have occurred which must require further review. These include new developments that will severely affect water supply and water quality in the Santa Clarita Valley.

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**Spread of Ammonium Perchlorate Pollution to Well V201 and Well V205**

Ammonium perchlorate interferes with iodine uptake by the thyroid gland, thus producing hypothyroidism. This condition especially affects sensitive populations including fetuses, infants, small children and those with impaired immune systems. It can cause retardation in infants and children. While State officials have set the Maximum Contaminant Level (MCL) level at 6, others have urged an even lower MCL for ammonium perchlorate and the Environmental Working Group urges a 0 tolerance level for children. The public in this Valley were not even informed of the closure of this drinking water well until much later, and this information did not appear in the EIR for this project.

The EIR/EIS for the Newhall Ranch River Alteration Permit did not disclose or discuss this information. It and another well, (V205) remain closed as of today.

This is an extremely serious situation since it means that the pollution plume has moved beyond the “pump and treat” capture wells and is moving at a much faster rate of travel than previously estimated would occur. (See attached Maps for location of various water supply and monitoring wells and the extent of the plume).<sup>4</sup> In 2004, the environmental community, including SCOPE, expressed alarm over the possibility of such a scenario, but the water agencies and others disregarded those concerns.

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If pumping from this well continues, such pumping may draw the pollution plume further in a westerly direction, thus spreading the contamination into an even greater portion of the Saugus aquifer and possibly making that ground water source unusable.

The continued spread of the pollution plume has major implications for water supply in the Santa Clarita Valley. The Saugus Aquifer is one of the two major sources of ground water that supplies our community. It is the source that has been relied upon in case of a drought where surface flow and imported State Water Project Water may become severely curtailed or not available at all.

In 2004 the Appellate Court<sup>5</sup> found for the Friends of the Santa Clara River and the Sierra Club and set aside CLWA’s 2000 Urban Water Management Plan for failure to provide a timeline indicating when treatment facilities for water polluted by ammonium perchlorate would be available.

<sup>4</sup> AECOM maps attached showing spread of the plume and well locations, Exhibit 2

<sup>5</sup> *Friends of the Santa Clara River v. Castaic Lake Water Agency* (2004) 123 Cal.App.4th

SCOPE Comments on the Newhall Ranch River Alteration Permit

Comment Letter No. O25

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That Decision included the following testimony from Department of Toxic Substances:

*“The concentration of perchlorate in the production wells probably represents the leading edge of a much larger plume of higher concentrations of perchlorate. The total area of the Saugus Aquifer contaminated by the perchlorate has yet to be fully defined. We do know that the contaminant has migrated a minimum of 2 miles through the subsurface and over land to contaminate the vital pumping areas. (Exhibit 23.) Since the groundwater gradients in the contaminated area in the Saugus are towards the west, the contaminant is likely to continue to migrate further west and northwest. Time of travel from the soil contamination sites to the deep Saugus wells implies that the contaminant has been moving between 1 to 3 feet per day within the Saugus Aquifer. This implies that the perchlorate could impact [VWC’s] well No. 201 as early as next year. Further down gradient is [VWC’s] well No. 160.”*

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*Also, Richard D. McJunkin, a senior hydrogeologist with the California Department of Toxic Substances Control, testified that increased pumping of water from wells near the contamination site will accelerate the flow of the perchlorate contamination.”<sup>6</sup>*

We note that Valencia Water Co. has two additional down gradient wells, V205 (also now closed) and V206 that are major drinking water supply producers, in addition to the well 160 mentioned above. Continued pumping from these wells may (and has, for V201 and V205) result in their eventual closure. This is one of the most important reasons that further modeling and evaluation are needed before an additional 21,000 units receives final approval

In light of the 2004 precedent setting legal decision involving the Agency’s failure to adequately disclose the ammonium perchlorate pollution problem, we encourage the County and the Dept. of Fish and Wildlife to review water availability for this project before this document is certified.

### **Drought**

Over the last 6-7 years California has suffered an extreme drought throughout the state, but especially in the Santa Clarita Valley. Many of our alluvial drinking water wells went dry and remained so for several years. A report on alluvial pumping (attached, Exhibit 3) indicated that we cannot withdraw as much water as previously reported during such a period. As climate change progresses, such drought periods are predicted to become even more severe. The adequacy of water supply and the effects of pumping on the river habitat need to be re-evaluated before any decision is made that allows an additional 21,000 units

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### **Drainage/Hydrology**

The Civil Engineer for the project Hydrology/Drainage studies appears to have misrepresented the 75th and 85th percentile for the area hyetograph. The permeability of the new engineered compacted fills is considerably less than reported. Such an error could affect the river flows, and thus will affect the habitat of the fully protected UTS. This data needs to be corrected and re-circulated.

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<sup>6</sup> *Ibid.* Opinion at page 10

**Comment Letter No. 025**

SCOPE Comments on the Newhall Ranch River Alteration Permit

7

**Conclusion**

SCOPE joins with other organizations and members of the community in asking that the California Fish and Wildlife not certify this Additional Information Document without addressing the issues above and including additional chapters in order to fully assess the increase to GH Gases caused by this project.

Sincerely,

29



Lynne Plambeck  
President

Attachments for the Administrative Record:

1. Newhall Ranch Specific Plan Table of Land uses
2. Maps of well locations and the extent of the pollution plume
3. Report on alluvial pumping.

**Comment Letter No. 025**

**DEVELOPMENT PLAN  
2.3 LAND USE PLAN**

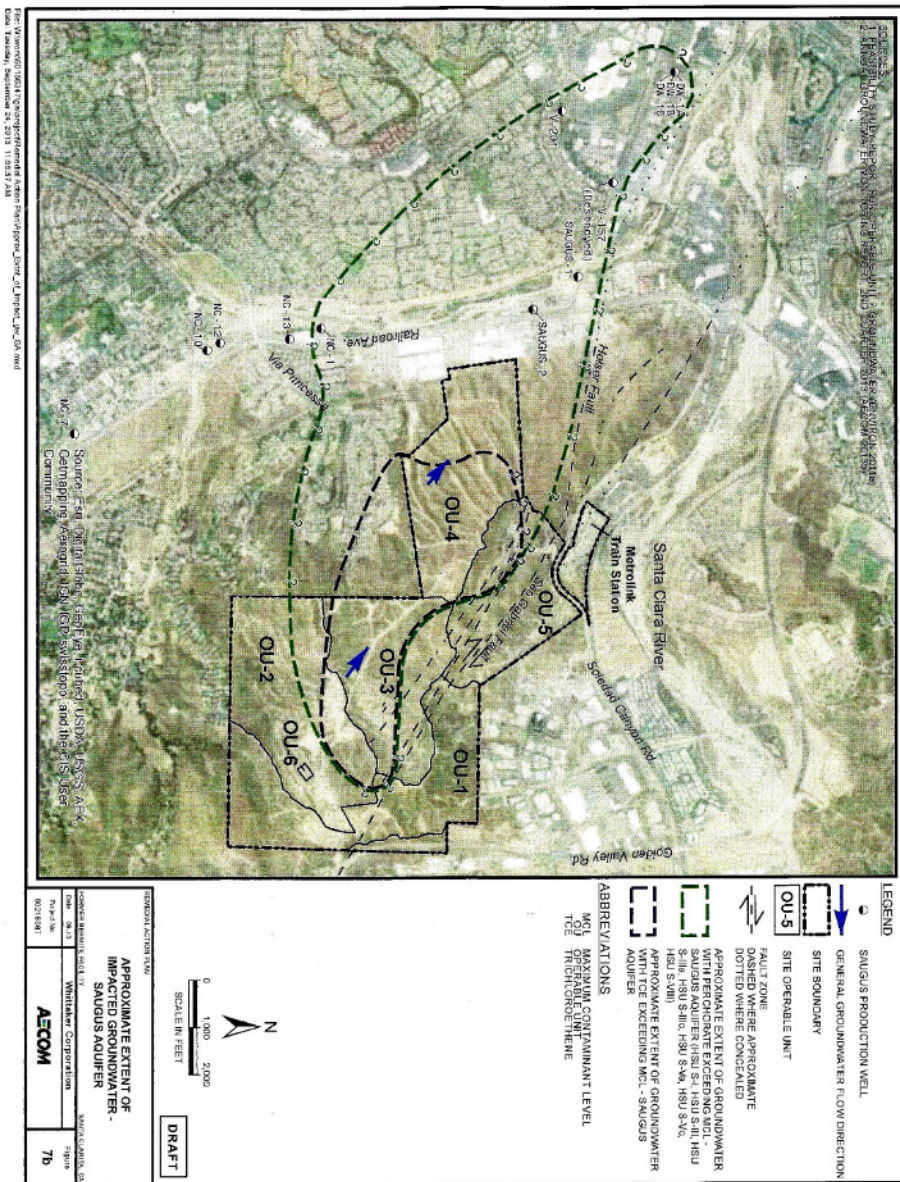
**TABLE 2.3-1**

**OVERALL LAND USE PLAN STATISTICAL TABLE  
Newhall Ranch Specific Plan**

LAND USES	Gross Acres	Dwelling Units	Second Units <sup>1</sup>	Land Use Overlays	
					Approx. Acre Allocation
<b>Residential:</b>					
Estate <sup>1</sup>	1,324.0	423	423	10 Neighborhood Parks	50 ac
Low	744.4	671		5 Elementary Schools	35 ac
Low-Medium	1,781.7	6,000		1 Junior High School	25 ac
Medium	841.0	7,371		1 High School	45 ac
High	121.8	2,319		1 Golf Course	180 ac
<b>Subtotal</b>	<b>4,812.9</b>	<b>16,784</b>	<b>423</b>	2 Fire Stations	2 ac
<b>Mixed-Use and Non-Residential:</b>				1 Library	2 ac
Mixed-Use <sup>2</sup>	628.7	4101		1 Water Recl. Plant	15 ac
Commercial	67.2			1 Lake	15 ac
Business Park	248.6			3 Community Parks	181 ac
Visitor Serving	36.7			1 Electrical Substation	2 ac
<b>Subtotal</b>	<b>981.1</b>	<b>4,101</b>	<b>0</b>	Arterial Roads	331 ac
<b>Major Open Areas:</b>					
High Country SMA	4,184.6				
River Corridor SMA	974.8				
Open Area	1,010.4				
<b>Subtotal</b>	<b>6,169.8</b>	<b>0</b>	<b>0</b>		
<b>TOTAL</b>	<b>11,963.8</b>	<b>20,885</b>	<b>423</b>		
(Total Units including Second Units <sup>1</sup> )		21,308			

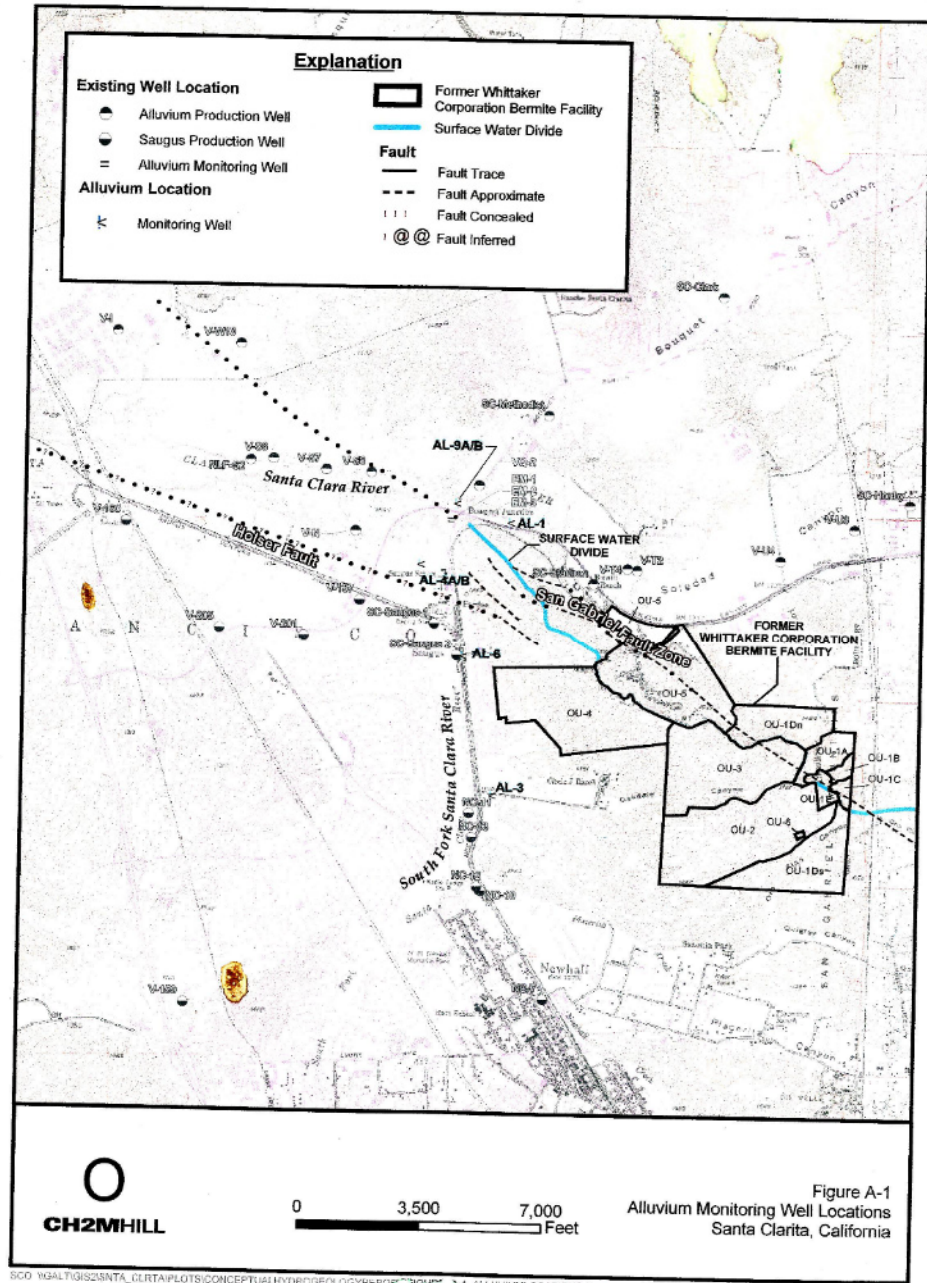
30

<sup>1</sup> Within each Estate lot one (1) Second Unit is eligible to be constructed with the approval of a CUP (see Second Units, Section 3.9). This may increase the total number of permitted dwelling units of 20,885 by 423, to a maximum total units of 21,308.  
<sup>2</sup> Mixed-Use includes commercial and residential uses.





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## DRAFT Technical Memorandum

**To:** Keith Abercrombie/Valencia Water Company  
 Steve Cole/Newhall County Water District  
 Mauricio Guardado/Santa Clarita Water Division of CLWA  
 Dirk Marks/Castaic Lake Water Agency (CLWA)

**From:** John Porcello/GSI Water Solutions, Inc.  
 Walt Burt/GSI Water Solutions, Inc.

**Date:** December 15, 2014

**Subject:** Evaluation of Groundwater Pumping Targets for the Alluvial Aquifer in 2015  
 Santa Clara River Valley East Subbasin (Santa Clarita Valley, California)

## Introduction

This technical memorandum presents the results of an analysis conducted by GSI Water Solutions, Inc. (GSI), to evaluate the achievability of target production volumes identified by the local retail water purveyors for groundwater pumping during 2015 from the local Alluvial Aquifer system in the Santa Clarita Valley, California. As specified in GSI's scope of work (dated October 6, 2014), this effort evaluated whether the target production volumes from Alluvial Aquifer wells during 2014 would be achievable in 2015 if ongoing local drought conditions and curtailments of State Water Project water were to continue into 2015.

The analysis was conducted for the 33 purveyor-owned production wells that currently operate in the Alluvial Aquifer (15 wells owned and operated by Valencia Water Company [VWC]; 6 wells owned and operated by Newhall County Water District [NCWD]; and 12 wells owned and operated by the Santa Clarita Water Division [SCWD] of the Castaic Lake Water Agency [CLWA]). The purveyors' Groundwater Operating Plan calls for the Alluvial Aquifer to provide between 30,000 and 35,000 acre-feet per year (AFY) of groundwater supply during local drought years. Of this amount, approximately 27,500 AFY are specified to be pumped by the three retail water purveyors (VWC, SCWD, and NWCD). The Groundwater Operating Plan was first established for the local groundwater basin during the 2000s (CH2M HILL and LSCE,

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DECEMBER 15, 2014

PAGE 2

**Comment Letter No. O25**

2005) and subsequently was updated in 2009 (LSCE and GSI, 2009) and 2014 (GSI and LSCE, 2014).

From the fall of 2013 through the fall of 2014, the three retail water purveyors together pumped approximately 25,000 AFY of Alluvial Aquifer groundwater, or about 10 percent less than the 27,500 AFY target production volume that is identified in the Groundwater Operating Plan for the Alluvial Aquifer during locally dry years. Several wells experienced difficulty achieving their target volumes during 2014, particularly wells owned by SCWD and NCWD that are located in the upper reaches of the watershed (where groundwater levels and groundwater recharge rates are highly sensitive to year-to-year variations in rainfall and streamflow). During the period from the fall of 2013 to the fall of 2014, each of three wells owned by SCWD pumped less than 100 AFY, and four wells owned by SCWD did not operate at all. Personnel from SCWD and NCWD have stated to GSI that in the absence of recharge during the winter of 2014/spring of 2015, more wells could be taken offline or used in an even more restricted manner than occurred in 2014.

## Approach

GSI's study approach consisted of first developing an initial assessment of each well's recent and projected operating condition. In November 2014, GSI provided these detailed assessments to each purveyor for their review, comment, and follow-on discussion. GSI then conducted a final assessment that incorporated any new information provided by a given water purveyor, as well as any changes to the 2015 target pumping volumes that the retail water purveyor requested by analyzed.

For both the draft and final assessments, the results were derived by combining (1) groundwater modeling projections of groundwater level trends in the aquifer with (2) information on well designs, pump settings, and pumping operations at each production well. The groundwater modeling work was conducted using the water purveyors' numerical model of the local groundwater basin. GSI's analysis assumed that in 2015:

- No new wells would be drilled.
- No modifications would occur to the depths or shut-off settings at any existing well.
- No deepening, reconditioning, or other alterations would occur to the construction of any existing well.

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## Conclusions

Rainfall records, groundwater level monitoring, and groundwater modeling together indicate that little to no recharge has occurred to the Alluvial Aquifer since the winter of 2010/spring of 2011 rainfall season. The groundwater level monitoring program shows that groundwater levels have declined at a fairly steady rate since that time, as has been observed in other past periods of local drought conditions (such as occurred in 1984 through 1992 and again in 1999 through 2004). The continued decline in groundwater levels that was observed in 2014 at many Alluvial Aquifer wells will continue in 2015 if little to no rainfall and streamflow recharge occurs to the local aquifer systems during the winter of 2014/spring of 2015 rainfall season.

Under this scenario, and assuming there are no new wells or modifications to existing wells and pumping systems, GSI's primary conclusions regarding the achievability of the target pumping volumes from the Alluvial Aquifer in 2015 are presented in Table 1 and are summarized as follows:

1. For the three retail water purveyors combined, the achievable yield from the Alluvial Aquifer in 2015 is likely between 17,100 and 21,800 AFY. The Groundwater Operating Plan's drought-year target of 27,400 AFY of collective production by the three retail water purveyors will not be achievable if the drought continues through the winter of 2014/spring of 2015 rainfall season.
2. The largest shortfall in yield is estimated to occur for VWC. The estimated achievable production volume for VWC wells (between 14,600 and 17,900 AFY in 2015) creates shortfalls of (a) 3,600 to 6,900 AFY compared with VWC's target production under the Groundwater Operating Plan and (b) 1,100 to 4,400 AFY compared with the 2015 target production volume that was of interest to VWC.
3. The estimated shortfalls in groundwater production from the Alluvial Aquifer are notably smaller for SCWD and NCWD than for VWC.
  - a. SCWD's wells likely can produce between 1,700 and 2,700 AFY from the Alluvial Aquifer in 2015. This represents a shortfall of 1,800 to 2,800 AFY compared with the Groundwater Operating Plan, and a shortfall of 1,500 to 2,500 AFY compared with the 2015 target production volume that was tested by GSI.
  - b. NCWD's wells likely can produce between 800 and 1,200 AFY from the Alluvial Aquifer in 2015. This represents a shortfall of 200 to 600 AFY compared with the Groundwater Operating Plan, and a shortfall of zero to 500 AFY compared with the 2015 target production volume that was tested by GSI.
4. The estimates of the achievable yield listed in Table 1 are reasonable estimates of the groundwater production capacity from the Alluvial Aquifer that the three retail water purveyors can expect to achieve in 2015 should the local drought

DECEMBER 15, 2014

PAGE 4

**Comment Letter No. O25**

continue. Actual groundwater production volumes from the Alluvial Aquifer could be notably higher if there are appreciable amounts of rainfall, streamflow, and groundwater recharge during the winter of 2014/spring of 2015 rainfall season.

5. Some of the purveyors' wells currently have pump depths that pose a significant limitation on usage of the well. Higher volumes of production may be possible in 2015 if the pumps are lowered for those wells where the pumps are set notably higher than the bottom of the well. Based on GSI's analysis and conversations with representatives of each water purveyor, it appears that the right physical conditions may exist to lower the pump columns of certain wells (7 wells owned by VWC; at least 1 well, and perhaps 5 wells, owned by SCWD; and 2 or 3 wells owned by NCWD). However, any increases in 2015 groundwater production that arise from lowering the pump at a given well may prove to be only temporary if the drought continues. This in turn means that the post-modification production volumes *after* 2015 could be the same as (or lower than) the production that would have been achieved *during* 2015 without any modifications to the pumps and their shut-off settings.

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## References

CH2M HILL and LSCE. 2005. *Analysis of Groundwater Basin Yield, Upper Santa Clara River Groundwater Basin, East Subbasin, Los Angeles County California*. Prepared for The Upper Basin Water Purveyors (Castaic Lake Water Agency, Newhall County Water District, Santa Clarita Water Division of CLWA, and Valencia Water Company) by CH2M HILL and Luhdorff and Scalmanini Consulting Engineers (LSCE). August 2005.

LSCE and GSI. 2009. *Analysis of Groundwater Supplies and Groundwater Basin Yield, Upper Santa Clara River Groundwater Basin, East Subbasin*. Prepared for the Santa Clarita Valley Municipal Water Purveyors by Luhdorff and Scalmanini Consulting Engineers (LSCE) and GSI Water Solutions (GSI). August 2009.

GSI and LSCE. 2014. *Draft Report: Perchlorate Containment Plan for Well V201 and Saugus Formation Groundwater in the Santa Clarita Valley (Task 3 of the Well V201 Restoration Program)*. Prepared for Valencia Water Company. Prepared by GSI Water Solutions (GSI) and Luhdorff and Scalmanini Consulting Engineers (LSCE). March 2014.

DRAFT

**Table 1**  
**Alluvial Aquifer Pumping Analysis for 2015 - All Retail Water Purveyors**

Prepared by GSI Water Solutions, Inc.

Retail Water Purveyor	Drought-Year Pumping Target in Groundwater Operating Plan	2015 Pumping Target Tested by GSI	Estimated Achievable Yield in 2015 from Existing Alluvial Aquifer Wells	Potential Shortfall in Meeting the Drought-Year Pumping Target in the Groundwater Operating Plan	Potential Shortfall in Meeting the 2015 Pumping Target Tested by GSI	Retail Water Purveyor
VWC	21,500	19,000	14,600 to 17,900	-6,900 to -3,600	-4,400 to -1,100	VWC
SCWD	4,500	4,200	1,700 to 2,700	-2,800 to -1,800	-2,500 to -1,500	SCWD
NCWD	1,400	1,300	800 to 1,200	-600 to -200	-500 to -100	NCWD
<b>TOTAL</b>	<b>27,400</b>	<b>24,500</b>	<b>17,100 to 21,800</b>	<b>-10,300 to -5,600</b>	<b>-7,400 to -2,700</b>	<b>TOTAL</b>

All volumes are in units of acre-feet per year (AF/year).

All listed values for shortfalls and likely achievable yields are estimates and are not guaranteed.

VWC = Valencia Water Company SCWD = Santa Clarita Water Division of the Castaic Lake Water Agency NCWD = Newhall County Water District

Comment Letter No. O25

Comment Letter No. 026



Santa Clarita Valley  
Auto Dealers  
Community Driven.

01/26/17

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

Re: Newhall Ranch

Dear Ms Courtney:

The Santa Clarita Valley Auto Dealers Association fully supports Newhall Ranch and its first two communities, Landmark Village and Mission Village. Our Association is comprised of 18 dealerships, and represents one of the largest combined collections of auto dealers in Los Angeles County, and a significant source of sales tax revenue and employment for the local economy.

On behalf of the Association, we are sending letter in support of the Net Zero Newhall initiative, which would make Landmark Village, Mission Village and the overall Newhall Ranch community, a precedent-setting project in California and the nation. Electric vehicles and hybrids have become quite popular, and will no doubt be selected by an even greater percentage of the population, as electric vehicle charging stations, such as those provided at Newhall Ranch, become available throughout the region, and with every home.

Speaking for our 18 dealerships, representing 24 outstanding brands of automobiles with employees that not only work, but live in this area, we welcome a plan of this quality and sustainable environmental innovation. Combined with the preservation of 10,000 acres of open space, the complete Newhall Ranch community will result in a coveted lifestyle for residents. In addition, Newhall Ranch will provide much needed job growth to our region as well as critically needed new housing.

As forward-thinking businesses owned by some of the Santa Clarita Valley's most involved civic leaders, our mission is clear: we must constantly innovate to find ways to pursue smart growth in environmentally sustainable ways and protect quality local jobs that will best position us to compete in the 21st century economy.

Once again, we fully support Newhall Ranch and its first two communities, Landmark Village and Mission Village.

Sincerely,

Don Fleming  
President

Valencia Auto Dealers Association

Phone: 661 255.3000 • Fax: 661 255.0591 • 23955 Creekside Rd., Valencia, CA 91355



1

**Comment Letter No. 027**

**Wildlife Newhall Ranch**

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**From:** Lois Bauccio <lbauccio@scvchamber.com>  
**Sent:** Monday, February 13, 2017 2:42 PM  
**To:** Wildlife Newhall Ranch  
**Subject:** Newhall Ranch - Comments on Newhall Ranch Draft AEA in the subject line  
**Attachments:** 0106\_001.pdf

Dear Ms. Courtney,

Please see attached letter. Thank you

I 

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## Comment Letter No. O27


**SANTA CLARITA VALLEY  
Chamber of Commerce**

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

Via Email – newhallranch@wildlife.ca.gov

Dear Ms. Courtney,

I write to you representing the Santa Clarita Valley Chamber of Commerce, a chamber that has recently grown to also represent the SCV Latino Business Alliance and the Castaic Chamber of Commerce comprised of 1,400 businesses representing thousands of employees.

We are excited about Newhall Ranch moving forward as this project not only generates much needed housing but also is an economic driver that will benefit the region and state tremendously.

The Newhall communities will ultimately generate thousands of permanent jobs and create millions of dollars in annual income and sales tax revenues after the build out. All of this while simultaneously working to combat climate change under the Net Zero Newhall initiative that is consistent with the recently approved climate measures SB32 and AB197, with no net greenhouse gas emissions for the development. This bold new measure is cutting edge and one that we welcome here in the Santa Clarita Valley. This, coupled with FivePoint's continued dedication to preserving open space, truly makes this the most sustainable development of our time.

The Newhall Ranch Development is an opportunity not only to address the need for much needed local jobs, but also address the housing crisis. The lack of home inventory is increasing housing costs making affordability making it more difficult for families to buy a home. With Newhall Ranch, we are pleased to see a variety of homes that will be available at various price points. This will enable many families to afford a home.

There are so many economic benefits associated with this project. In addition, knowing that the GHG and stickleback fish issues can be resolved enable the Santa Clarita Valley Chamber of Commerce to strongly support this development.

Yours truly,

*Luis M. Bautista*

SCV Chamber of Commerce  
President and CEO

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**Santa Clarita City Hall**

23920 Valencia Blvd., Suite 265 • Santa Clarita, CA 91355  
P (661) 702-6977 • F (661) 702-6980

2

3

**Comment Letter No. 028**

**Wildlife Newhall Ranch**

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**From:** Kelly Le Berthon <KellyLeBerthon@scvedc.org>  
**Sent:** Monday, February 13, 2017 11:40 AM  
**To:** Wildlife Newhall Ranch  
**Subject:** Newhall Ranch  
**Attachments:** Net Zero Newhall CA Dpt Fish and Wildlife.pdf

Dear. Ms. Courtney:

Attached please find a letter from Holly Schroeder in support of the Newhall Ranch project.  
Thank you and have a great day.

I 1

Kelly Le Berthon

Administrative Services Assistant  
Santa Clarita Valley Economic Development Corporation  
26455 Rockwell Canyon Road, UCEN Suite 263  
Santa Clarita, CA 91355  
661-288-4409 (o)





**SANTA CLARITA VALLEY**  
ECONOMIC DEVELOPMENT CORPORATION

**Comment Letter No. 028**

February 13, 2017

Ms. Betty Courtney  
Environmental Program Manager I, South Coast Region  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, CA 92123

Re: Newhall Ranch

Dear Ms. Courtney:

On behalf of Santa Clarita Valley Economic Development Corporation (SCVEDC) it is my pleasure to write a letter of support for Newhall Ranch proposed by FivePoint. As you may know, the SCVEDC has been instrumental in establishing the greater Santa Clarita area as one of L.A. County's most business-friendly regions. We have helped to bring thousands of new jobs to the Santa Clarita Valley and have recruited prominent companies that may have otherwise taken their business out of state.

As President and CEO of SCVEDC, I believe that FivePoint's vision for Newhall Ranch represents an unprecedented economic development opportunity for the Santa Clarita Valley. The project will provide much needed housing for our growing population – including affordable housing – and the complete Newhall Ranch community will create 60,000 permanent new jobs for the region.

Our state leads the nation in embracing new technologies, ranging from clean energy to sustainable transportation. FivePoint is embracing state of the art technology in every aspect of its design, resulting in a community that creates zero net greenhouse gas emissions. From providing subsidies to speed the adoption of electric vehicles to embracing the use of solar energy, FivePoint's Net Zero Newhall initiative represents a new paradigm for community development in California and the nation. In addition, Net Zero Newhall will help our region develop as a hub for clean technology jobs and innovation, diversifying our local economy into dynamic and fast-growing areas.

Beginning with Valencia – a community created by the same local developers behind Newhall Ranch – the Santa Clarita Valley has a long history of creating livable neighborhoods that encourage active, outdoor lifestyles. FivePoint's groundbreaking plan for Newhall Ranch will give us the opportunity to attract continued innovation to the Santa Clarita Valley that will advance our mission of promoting sustainable economic growth for the benefit of all residents – current and future!

2

26455 Rodowill Canyon Road | University Center, Suite 263 | Santa Clarita, CA 91355  
(661) 288-4400 | Fax (661) 288-9114 | scvedc.org

**Comment Letter No. O28**

Please join me in supporting FivePoint in their exciting and innovative new endeavor, Newhall Ranch -  
Net Zero Newhall.

2

Sincerely,



Holly Schroeder  
President and CEO

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26455 Rockwell Canyon Road | University Center, Suite 263 | Santa Clarita, CA 91355  
(661) 288-4400 | Fax (661) 288-4414 | [scvedc.org](http://scvedc.org)

**Comment Letter No. O29**

**Wildlife Newhall Ranch**

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**From:** James Flournoy <saveourcommunitysgv@gmail.com>  
**Sent:** Monday, February 13, 2017 9:11 AM  
**To:** specialprojects@planning.lacounty.gov; daranda@planning.lacounty.gov; Wildlife Newhall Ranch  
**Subject:** (SCH No. 2000011025) Comments  
**Attachments:** Newhall Ranch Submissions 1.doc; Newhall final comments Seismic.doc; CYBERSHAKE.doc; newhall bibliography.odt; Seismic\_Factor\_Study.pdf; sydnor-july2005.pdf

Feb 11, 1016

Save Our Community SGV  
 A public benefit association  
 c/o 8655 Landis View Ave  
 Rosemead CA 91770

Thank you for considering our comments on the revised Newhall ranch proposals

Compiled by members including 2 Geologists, a building official, a Contractor experienced in schools, hospitals and industrial/ commercial, and an inspector for Refineries (all retired)

final edit by James Flournoy

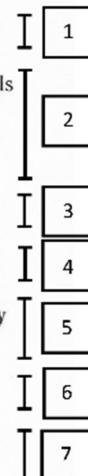
Intro is in "Newhall Ranch Submissions" which covers the Regulatory Environment

**Newhall final comments Seismic also includes references which we hope are helpful**

**Cybershake give an example of a computer modeled seismic study we also suggest Terrashake especially for the hazard of the distant San Andreas Fault**

**Bibliography also contains comments**

**Syndor is an excellent cookbook for major projects- it must updated to current CBC and CGS Note 48 checklist it is also prior to Terrashake/ Cybershake but does cover Seismograms**



ATTACHMENT 1  
PAGE 1 OF 19

specialprojects@planning.lacounty.gov  
Diane Aranda Special Projects Section  
daranda@planning.lacounty.gov  
Newhall Ranch submission  
USF&W  
newhallranch@wildlife.ca.gov.

Planning Commissioners:

Thank you for accepting our comments on the revised Newhall ranch proposal

**Draft Additional Environmental Analysis for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan Environmental Impact Report (SCH No. 2000011025)**

REGULATORY ENVIRONMENT

We are concerned that under CEQA 15162

- (3) There is New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete
- a) the lead agency MUST determine, on the basis of substantial evidence in the light of the whole record, one or more of the following:

For example the adoption of the 2016 Los Angeles County Building Code with Local amendments which substantially changes the way earthquake and liquefaction must be analyzed.

- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- to wit: the Project proposes major changes in Bridges and Embankments and the construction of critical infrastructure including Schools, Fire Stations, Cell Towers, Water Tanks and water distribution used for fire fighting

AND there have been substantial recent findings on earthquake hazards which have not been considered

- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- there have been substantial recent findings on earthquake hazards which have not been considered

- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a).

## Comment Letter No. O29

ATTACHMENT 2  
PAGE 1 OF 16

## SEISMIC STUDY Final COMMENTS

Since you can't use the Seismic Hazard Map and Report to get seismic anymore and you have to do Deterministic AND Probabilistic site-specific hazard analysis and you can't use the USGS or CGS quick and dirty on line look ups and since you are doing bridge

We thought we would help by introducing you to the CalTrans ARS tool. It gives distances to local faults- well most of them.

A couple of caveats. It is based on the old CalTrans map which uses different fault segments than the current USGS and CGS maps which are based on the SCEC Community Fault Model- citations later and it does not contain all – especially the thrust faults.

WE know Lillian Maulchin retired CalTrans Chief Seismologist who did the maps and Martha Merriman who developed this fine tool-also retired and we do not know if CalTrans currently is budgeted for a real Seismologist- pity.

The distances given MUST be double checked as they are given to the middle of a fault segment or the middle of a thrust fault plane where a project may be near the fault tip. On thrust faults it makes a big difference if the thrust is sloping toward the project or down and under the project or sloping down and away (hanging wall footwall and all that).

The ARS tool knows nothing of basins – reflections (the “perfect storm effect”) or basin depth amplification or directivity or sources or paths, or velocities from the source to the site. It does not know if the source is in or under a basin or the path comes from the outside into the basin. It knows nothing about basin excitement- the bowl of jello effect. It basically uses distance magnitude, attenuation relationships (NOT NGA-2) and VS-30.

It does not cover multiple segment breaks

It does not do Vertical

ARS still uses NGA Attenuation Relationships and not the current NGA-2 ones- it comes close on ROCK Sources and Paths and Sites but not so much as soils get softer But it's a start.

WE DO NOT CONSIDER THAT NGA or any AR or GMPE give the required site-specific ground motions required for this project The do not consider source- path and site as required.

The CalTrans uses a near fault method that is an improvement over CBC-98 see their references

We would expect the CBC 98 Near Fault Table 16 Ca and Cv to be generated for reference.

The footnote to table 16 requires that Thrust faults be considered

The consultants get to generate their own site-specific curves using all the factors mentioned above. THE ARS app does not begin to get long period ground motion from large distant events anywhere close to right

Why not use Blake EQFAULT & FRISK? AFIK Blake still uses the CGS 2002 California Fault Model <http://www.thomasblake.com/images/CGSALB1-LetterAll.pdf>

Same basic problems of data adequacy, current data , transparency, and to use it takes a lot of hand tweaking for every fault and then it's hard to tell what you have

You can run this ARS app with locations and various VS-30

*BASIN DEPTH DEPTH/ MAP is required*

*[dap3.dot.ca.gov/ARS\\_Online/](http://dap3.dot.ca.gov/ARS_Online/)*

Technical reference is here [http://dap3.dot.ca.gov/ARS\\_Online/technical.php](http://dap3.dot.ca.gov/ARS_Online/technical.php)

Methodology for Developing Design Response Spectrum for Use in Seismic Design Recommendations November 2012

[http://dap3.dot.ca.gov/ARS\\_Online/Tech\\_Docs/Methodology%20for%20Developing%20DRS\\_12-5-](http://dap3.dot.ca.gov/ARS_Online/Tech_Docs/Methodology%20for%20Developing%20DRS_12-5-)

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## CYBERHAKE

The REGULATORY GMED Manual requires analysis of source, path and site.

Simple method Maps included SPPV is not appropriate as Thrust faults are not included  
SP117A 2008 prohibits the use of the SPPV (Simple) method “near fault due to directivity and other near fault effects.

## CGS MAP SAYS

We have NOT included ALL ACTIVE FAULT SOURCES...

IN ADDITION, the BLIND THRUST FAULTS WERE EXCLUDED IN THIS UBC APPLICATION

“These maps (the UBC Map book) were developed to ASSIST the engineering community in determining the near-source seismic factors that are applied within UBC seismic zone 4”

**Thrust faults are CBC Class “B” and must be considered for “near fault” effects**  
**Thrust faults are required to be considered by 1998 CBC as shown in the footnote to CBC-98 Table 16 (see California Geology March/April 1998)**

## 1997 UBC ADDED NEAR FIELD SEISMIC FACTORS

1998 CBC Section 1629.4.2 and Tables 16-S and 16-T.

**CBC Section 1629, Criteria Selection, requires Near-Source Factors for Seismic Source Type A to be applied to the design of structures**

**The ICC-CBC 98 near fault map is “NOT REGULATORY” Thrust faults are CBC Class “B” and must be considered for “near fault” effects**

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County and City codes are permitted to be more stringent than Title 24, but are not allowed to be less stringent than Title 24  
see; LA County Building Codes and the LA County Regional Code Update Program (LACRUP)

For the purposes of describing the size of the design (or scenario) earthquake of a particular fault segment, moment magnitude ( $M_w$ ) of the characteristic earthquake for that segment has replaced the concept of a maximum credible earthquake (MCE is ambiguous) of a particular Richter magnitude.

This has become necessary because the Richter Scale “saturates” at the higher magnitudes; that is, the Richter scale has difficulty differentiating the size of earthquakes above magnitude 7.5.

The  $M_w$  scale is proportional to the area of the fault surface that has slipped, and thus, is directly related to the length of the fault segment. Although the numbers appear lower than the traditional Richter magnitudes, they convey more precise (and more usable) information to geologic and structural engineers. See: <http://www.lbkarp.com/jellys/Jelly's.LR1ar.pdf> Page 7 for an excellent discussion ca .1999

County of Los Angeles Building Code Sections 110.2 (Geotechnical Hazards), 111 (Engineering Geology and Soils Engineering Reports), 112 (Earthquake Fault Zone Maps), 113 (Earthquake Faults), and Appendix J (Excavation and Grading). Now Chapter 33

Field, E.H., J.G. Anderson, T.L. Henyey, D.D. Jackson, W.B. Joyner, Y. Lee, H. Magistrale, B. Minster, K.B. Olsen, M.D. Petersen, J.H. Steidl, L.A. Wald, and C.J. Wills (2000).

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**ATTACHMENT 4  
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**Newhall Bibliography**

**REVIEWS**

These two must be used with SP-117A 2008 and the County GMED MANUAL and standards of professional practice

Guidelines for Reviewing Geologic Reports

California Geological Survey Note 41 – General Guidelines for Reviewing Geologic Reports, 1998.  
[www.conservation.ca.gov/cgs/information/publications/cgs\\_notes/note-41/](http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note-41/)  
[http://www.conservation.ca.gov/cgs/information/publications/cgs\\_notes/note\\_41](http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_41)

Guidelines for Preparing Geological Reports for Regional-Scale Environmental and Resource Management Planning CALIFORNIA DEPARTMENT OF CONSERVATION | CALIFORNIA GEOLOGICAL SURVEY NOTE 52 JANUARY 2013

[http://www.conservation.ca.gov/cgs/information/publications/cgs\\_notes/note\\_52/Documents/note\\_52.pdf](http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_52/Documents/note_52.pdf)

California Board for Professional Engineers, Land Surveyors, and Geologists:  
Geologic Guidelines for Earthquake and/or Fault Hazard Reports, July 1998.

California Board for Professional Engineers, Land Surveyors, and Geologists:  
Guidelines for Geophysical Reports for Engineering Geology, July 1998.

California Board for Professional Engineers, Land Surveyors, and Geologists:  
Guidelines for Groundwater Investigation Reports, July 1998.

California Board for Professional Engineers, Land Surveyors, and Geologists, Department of Consumer Affairs, Geologists and Geophysicists Act (Business and Professions Code, §§ 7800-7887, Chapter 12.5) with Rules and Regulations (California Code of Regulations, Title 16, Division 29, §§ 3000-3067) and Related Sections of the Business and Professions Code, Government Code, Penal Code and Evidence Code, January 1, 2013.

Overview of 2013 CBC and CGS Note 48 for 2005 CBC

[http://www.acgsc.org/chapters/inlandempire/shortcourses/2014/AEG-IE%20Short%20Course\\_2014-06-31\\_Thornburg.pdf](http://www.acgsc.org/chapters/inlandempire/shortcourses/2014/AEG-IE%20Short%20Course_2014-06-31_Thornburg.pdf)

Citations specific to 2013 CBC and ASCE 7-10. must be updated to 2016 CBC and we recommend ASCE 7-16 and FEMA -NEHRP 2015

/Apx\_4\_13bDraftSewardGeotechReport(2007).pdf

PRELIMINARY GEOLOGIC AND GEOTECHNICAL REPORT Updated EIR Review for Subject Portions of Newhall Ranch Mission Village, Landmark Village, Homestead and WRP Site Newhall Ranch Los Angeles County, California

The Newhall Land and Farming Company Job No: 07-1155UE (1) October 31, 2007

nice report but no Sec 111 certification and it does not appear that they reference LACODPW MANUAL it needs to be easier to find FINAL reports and their Reviews

“Geologic hazards that may be produced by a seismic event (earthquake) include Ground Rupture, Ground Motion, and Ground Failure “

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**ATTACHMENT 5  
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**INVESTIGATION OF AN IDENTIFIED SHORT-COMING IN THE  
SEISMIC DESIGN PROCEDURES OF ASCE 7-10 AND DEVELOPMENT  
OF RECOMMENDED IMPROVEMENTS FOR ASCE 7-16**

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Prepared for:

**Building Seismic Safety Council  
National Institute of Building Sciences  
Washington, D.C.**

Prepared by:

**Kircher & Associates  
Consulting Engineers  
Palo Alto, California**

**March 15, 2015**



**Comment Letter No. O29**

ATTACHMENT 6  
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The Resources Agency  
Michael Chrisman, *Secretary for Resources*

California Geological Survey  
Dr. John G. Parrish, *State Geologist*

# Engineering Geology and Seismology for Public Schools and Hospitals in California

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*to accompany California Geological Survey Note 48 Checklist*

by Robert H. Sydnor, *Senior Engineering Geologist*  
**California Geological Survey**

[www.conservation.ca.gov/cgs](http://www.conservation.ca.gov/cgs)

July 1, 2005

316 pages