Ventura County
Watershed Protection District

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August 24, 2009

Mr. Aaron O. Allen
U.S. Army Corps of Engineers
Ventura Field Office
2151 Alessandro Drive, Suite 110
Ventura, CA 93001

Subject: Comments on the Newhall Ranch Resource Management and Development Plan (RMDP) and the Spineflower Conservation Plan (SCP) Environmental Impact Statement/Environmental Impact Report (EIS/EIR)

Dear Mr. Allen:

Thank you for notifying the Ventura County Watershed Protection District (hereafter referred to as "District") that the Newhall Ranch Resource Management and Development Plan (RMDP) and the Spineflower Conservation Plan (SCP) Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is available for review and comment. Our understanding of Alternative 2 (Proposed Project) from the EIS/EIR is as follows: 1

"The RMDP component of the Project consists of infrastructure in the Santa Clara River and tributaries located on the Specific Plan site that are needed to implement the approved Specific Plan. The RMDP infrastructure are comprised of various flood control features, stream bank protection (i.e., buried soil cement, ungrouted rock riprap, turf reinforcement mats, and/or gunite slope lining), drainage facilities, roads, building pads, pipeline and utility river crossings, nature trails, new and widened bridges, the discharge outfall for the previously approved Newhall Ranch WRP, and drainage facility maintenance activities of the Los Angeles County Department of Public Works. The SCP component of the proposed Project would result in the establishment and maintenance of spineflower preserves. In total, approximately 167.6 acres of preserve area would be provided in the Project area." 2

A limited review of the referenced EIS/EIR has been completed in the area of Surface Water Hydrology and Flood Control (Section 4.1). The following comments are provided: 3

1. Page 4.1-2 of the EIS/EIR states, "It was concluded that the proposed Specific Plan would alter flows in the Santa Clara River; however, the effects would only be expected during infrequent flood events that reached the buried banks (e.g., 50-year and 100-year flood events)." Please explain and quantify the magnitude of the altered flow. 4

2. Page 4.1-2 of the EIS/EIR states, "With respect to flood impacts, the Newhall Ranch Specific Plan Program EIR concluded that the implementation of the Specific Plan's Conceptual Backbone Drainage Plan would result in an approximate 30 percent decrease in total debris volume and a 12 percent decrease in total burned and bulked runoff in the 20,724-acre tributary watershed where the Newhall Ranch Specific Plan is located." The District believes that using burned and bulked runoff and capital storm events only as a comparison to post-project built conditions is invalid for impact analysis. 5

3. The EIS/EIR does not adequately address the fact that the proposed RMDP infrastructure improvements may increase the flow in the Santa Clara River, which would ultimately increase the flow through the County of Ventura downstream. Increased flow volumes and/or increased peak velocities in the Santa Clara River could adversely impact downstream properties and flood control facilities and maintenance operations in Ventura County. 6

4. The District disagrees with the statement on page 4.1-55 of the EIS/EIR, "The proposed improvements do not impact storm flows in the Santa Clara River because these improvements are designed to accommodate the flows associated with the 2-, 5-, 10-, 20-, 50-, and 100-year floods events under the proposed conditions for Alternative 2." The proposed stabilizing treatments for portions of the existing major tributary drainages and the conversion of several smaller drainages to buried storm drains would have an adverse impact on storm flows in the Santa Clara River. The HEC model only considered flows in the project area, not the impact downstream within the Santa Clara River. 7

5. Page 4.1-118 of the EIS/EIR states, "Increases in the transport and deposition of debris from the Project area could result in secondary flood hazards downstream." The District requests that adequate erosion control measures be implemented to prevent significant sedimentation, erosion, or flooding impacts downstream of the project site. 8

6. The EIS/EIR should specify the amount of area set aside for dedicated erosion control/flood facilities to ensure their adequate implementation. 9

7. The District disagrees with the conclusion on Page 6.0-52 that states "no significant cumulative flooding impacts are expected to occur within the watershed," and questions the adequacy of the EIS/EIR's analysis of the cumulative impacts downstream of the proposed project which would affect District facilities and maintenance operations. Page 6.0-51 of the EIS/EIR states, "Development of the Specific Plan, along with development facilitated on the VCC and Entrada planning areas, would increase runoff into the Santa Clara River from upland areas due to increased impervious surface areas (e.g., pavement, roads, and buildings). The increase in discharges for different return events (two-year, five-year, 10-year, 20-year, 50-year, and 100-year) would be measurable to a point about four miles downstream of Newhall Ranch in Ventura County. Beyond this point, development of the Project would have no impact to flows." Please document the methodology and reasoning used to arrive at this conclusion. 10

8. The District respectfully requests to review engineering designs and plans for the proposed project flood control facilities, to allow for comment during the early design phase. 11

Please contact Elizabeth Martinez at (805) 658-4374 or Elizabeth.Martinez@ventura.org if you have any questions. Thank you for your consideration of these comments.

Sincerely,

Elizabeth L. Martinez

Elizabeth Martinez
Environmental Planner
(805) 658-4374

cc: Sergio Vargas, Deputy Director, VCWPD
Reading File

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015. Letter from the Ventura County Watershed Protection District, dated August 24, 2009

Response 1

The comment is an introduction to comments that follow and does not address the content or adequacy of the Draft EIS/EIR. Therefore, no additional response is provided. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 2

The comment restates information contained in the Draft EIS/EIR related to the development characteristics of the proposed Project (Alternative 2). The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project. However, because the comment does not address the adequacy of the environmental review provided by the Draft EIS/EIR, no additional response is provided.

Response 3

The comment is an introduction to comments that follow regarding the environmental analysis provided in the Draft EIS/EIR, **Section 4.1**, Surface Water Hydrology and Flood Control, and does not address the content or adequacy of the Draft EIS/EIR. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 4

Citing the Draft EIS/EIR, page 4.1-2, the comment requests that the magnitude of the altered flows in the Santa Clara River, as a result of Specific Plan build-out, be explained and quantified. The environmental analysis provided in Draft EIS/EIR, **Section 4.1**, Surface Water Hydrology and Flood Control, disclosed that the previously certified environmental documentation for the Newhall Ranch Specific Plan found that Specific Plan build-out would alter flows in the Santa Clara River; however, the effects would only be expected during infrequent flood events (*e.g.*, 50-year and 100-year flood events) that reached the buried banks. (Draft EIS/EIR, p. 4.1-2.)

The analysis provided in **Section 4.1** relied on Hydrologic Engineering Centers River Analysis system (HEC-RAS) model results to determine the floodplain area and hydraulic parameters for existing conditions and conditions following Project implementation. Regarding flows, the model was used to evaluate existing and post-Project conditions in the Santa Clara River for the 2-, 5-, 10-, 20-, 50-, and 100-year flow events. In comparison with existing conditions, the model results for the Project alternatives indicate minimal changes, if any, in the hydraulic parameters (maximum depth, average velocity, friction slope, top width, cross-sectional area, and total shear stress) within the lower-most reach of the modeled area (which extends to a point approximately four miles downstream of the Project boundary or four miles downstream of the Los Angeles County/Ventura County line) for the 2-year, 5-year, 10-year, and 20-year flood events. During the infrequent 50-year and 100-year flood events, the altered flow would increase the flood area within this reach. The Draft EIS/EIR concluded that the proposed Project's direct impacts would be as follows:

> "Based on the hydraulic model results (PACE, 2008A), the RMDP infrastructure would not be subjected to significant flooding impacts and would not result in significant risk of

loss, injury or death to people in the Project area. Therefore, the impacts associated with Alternative 2 are considered adverse, but less than significant relative to Significance Criterion 1. The proposed improvements do not impact storm flows in the Santa Clara River because these improvements are designed to accommodate the flows associated with the 2-, 5-, 10-, 20-, 50-, and 100-year floods events under the proposed conditions for Alternative 2. In addition, no storm flows are diverted from or to the River as a result of the Project, and no drainage tributary to the River would be prevented from flowing to the River in the proposed Project condition. Therefore, the impacts associated with Alternative 2 are considered adverse, but less than significant relative to Significance Criterion 2." (Draft EIS/EIR, p. 4.1-55.)

The HEC-RAS analysis, included in Section 2.3 of the previously certified Newhall Ranch Revised Additional Analysis (ISI, 2003) for the Specific Plan area, also considers flows to a point approximately four miles downstream of the Project site (four miles downstream of the Los Angeles County/Ventura County line). The model results for the cross-section located approximately four miles downstream of the Project site (four miles downstream of the Los Angeles County/Ventura County line) illustrates that flows would not be altered beyond that point.

The data informing the analysis presented in the Draft EIS/EIR and from Section 2.3 of the previously certified Newhall Ranch Additional Analysis for the referenced downstream reach are presented in the tables below:

Average Hydraulic Parameters in Santa Clara River for the Reach downstream of the Project Site (Located at a Point Approximately 4-Miles Downstream of Project Site, Within Ventura County [HEC-RAS River Station-to-Station 3080-1000]) (PACE, 2008)

Alt. No.	Max Depth (ft)	Avg. Velocity (fps)	Friction Slope (ft/ft)	Area (sq.ft)	Top Width (ft)	Total Shear (psf)
2-Year Storm Event						
Existing	3.1	4.4	0.0050	652.2	360.9	0.77
Alt. 2	3.1	4.4	0.0050	652.3	361.0	0.77
Delta	0	0	0	0.1	0.1	0
5-year Storm Event						
Existing	5.6	5.7	0.0049	1691.7	504.0	1.44
Alt. 2	5.6	5.7	0.0049	1692.0	504.8	1.44
Delta	0	0	0	0.3	0.8	0
10-Year Storm Event						
Existing	7.4	5.7	0.0049	2974.1	666.5	1.89
Alt. 2	7.4	5.7	0.0049	3009.8	666.4	1.92
Delta	0	0	0	35.7	-0.1	0.3
20-Year Storm Event						
Existing	9.2	6.3	0.0048	4407.3	800.4	1.99
Alt. 2	9.2	6.3	0.0048	4407.3	800.4	1.99
Delta	0	0	0	0	0	0

Average Hydraulic Parameters in Santa Clara River for the Reach downstream of the Project Site (Located at a Point Approximately 4-Miles Downstream of Project Site, Within Ventura County [HEC-RAS River Station-to-Station 3080-1000]) (PACE, 2008)

Alt. No.	Max Depth (ft)	Avg. Velocity (fps)	Friction Slope (ft/ft)	Area (sq.ft)	Top Width (ft)	Total Shear (psf)
50-Year Storm Event						
Existing	11.6	7.0	0.0047	6658.2	968.5	2.32
Alt. 2	11.7	6.9	0.0048	6774.3	970.5	2.39
Delta	0.1	-0.1	0.0001	116.1	2.0	0.07
100-Year Storm Event						
Existing	13.5	7.7	0.0046	8495.0	1053.7	2.66
Alt. 2	13.6	7.6	0.0047	8722.3	1056.0	2.85
Delta	0.1	-0.1	0.0001	227.3	2.3	0.19

Hydraulic Parameters (With Dissipation Downstream of County Line) in Santa Clara River for the Cross-Section Located Approximately 4-Miles Downstream of Project Site, Within Ventura County [HEC-RAS River Station 1000]) (Sikand, July 14, 2000)

Discharge Frequency	Existing Q Total (cfs)	Proposed Q Total (cfs)	Change in Q (cfs)	Existing Velocity (ft/s)	Proposed Velocity (ft/s)	Velocity Increase (ft)	Existing Depth (ft)	Proposed Depth (ft)	Depth Increase (ft)	Slope (ft/ft)
2-Year	2700	2700	0	4.59	4.59	0	1.51	1.51	0	0.004
5-Year	8800	8800	0	6.84	6.84	0	3.04	3.04	0	
10-Year	15975	15975	0	8.41	8.41	0	4.33	4.33	0	
20-Year	25815	25815	0	9.94	9.94	0	5.74	5.74	0	
50-Year	43950	43950	0	11.47	11.47	0	8.05	8.05	0	
100-Year	62190	62190	0	13	13	0	9.66	9.66	0	
Capital Q	174200	174400	200	21.79	21.79	0	14.26	14.27	0.01	

Project-Related Changes in Discharge Below the Specific Plan Site (Source: Sikand HEC-RAS Model, July 14, 2000)

Discharge Frequency	Existing Q Total (cfs)	Proposed Q Total (cfs)	Change in Q (cfs)	Existing Velocity (ft/s)	Proposed Velocity (ft/s)	Velocity Increase (ft)	Existing Depth (ft)	Proposed Depth (ft)	Depth Increase (ft)	Slope (ft/ft)
2-Year	2700	2700	0	4.59	4.59	0	1.51	1.51	0	0.004
5-Year	8800	8800	0	6.84	6.84	0	3.04	3.04	0	
10-Year	15975	15975	0	8.41	8.41	0	4.33	4.33	0	
20-Year	25815	25815	0	9.94	9.94	0	5.74	5.74	0	
50-Year	43950	43950	0	11.47	11.47	0	8.05	8.05	0	
100-Year	62190	62190	0	13	13	0	9.66	9.66	0	
Capital Q	174200	174400	200	21.79	21.79	0	14.26	14.27	0.01	

For further responsive information, please see revised **Section 4.1** of the Final EIS/EIR. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response 5

After summarizing the findings of the previously certified Newhall Ranch Specific Plan Program EIR, the comment states that the use of burned and bulked runoff and capita storm events as a comparison to post-project conditions is invalid. The statement cited in the comment, which is found on page 4.1-2 of the Draft EIS/EIR, was derived from the Newhall Ranch Specific Plan Program EIR.

Section 4.1 of the Draft EIS/EIR provided a stand-alone assessment of the potentially significant hydrology impacts associated with the proposed Project and alternatives. As noted on page 4.1-40, the hydraulic model used in the assessment of flood impacts was the U.S. Army Corps of Engineers' (Corps) HEC-RAS (River Analysis System, Version 3.1.2) water surface profile model. The model was used to determine the floodplain area and water surface elevations for existing conditions and port-Project conditions. Regarding flows, the model was used to evaluate existing and post-Project conditions in the Santa Clara River for the 2-, 5-, 10-, 20-, 50-, and 100-year flow events. The flows used in the model were obtained from 1994 Corps' study entitled, "Santa Clara River Adopted Discharge Frequency Values." This study is based upon a frequency analysis of stream flow data along the Santa Clara River and, therefore, approximates river flows from observed data. These values are presented in **Table 4.1-5** of the Draft EIS/EIR. These values include discharges from upstream tributaries and direct runoff from the watershed.

Six of the seven recurrence intervals included in the analysis were obtained from the 1994 study; the seventh, the Los Angeles County capital flood, is referenced from the previously published DPW ML Maps 43-ML-24 and 43-ML-25 of floodplain and floodway. This published capital flood flow rate from Los Angeles Department of Public Works (DPW) was recently revised downward. For comparison purposes, the existing and existing plus Project conditions were evaluated with previously published (higher) capital flood flow rates, but the final design of bank protection would utilize the newest (lower) rates. The analysis of **Section 4.1** of the Draft EIS/EIR primarily uses the model results for change in floodplain area and flows to evaluate impacts for each of the various Project alternatives. A comprehensive summary of the model results is provided in the PACE Floodplain Hydraulics Impacts Assessment for the Santa Clara River (PACE, 2008). Please also see revised **Section 4.1** of the Final EIS/EIR.

The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided. However, the comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 6

The comment states that the Draft EIS/EIR does not adequately address that proposed RMDP infrastructure may increase Santa Clara River flows, including in downstream areas (*i.e.*, Ventura County), which may adversely impact downstream properties, flood control facilities and maintenance operations. As stated on page 4.1-55 of the Draft EIS/EIR, "the proposed [RMDP] improvements do not impact storm flows in the Santa Clara River because these improvements are designed to accommodate

the flows associated with the 2-, 5-, 10-, 20-, 50-, and 100-year floods events under the proposed conditions for Alternative 2. In addition, no storm flows are diverted from or to the River as a result of the Project, and no drainage tributary to the River would be prevented from flowing to the River in the proposed Project condition." The comprehensive summary of the model results provided in PACE Floodplain Hydraulics Impacts Assessment for the Santa Clara River (2008A) also demonstrates that there is no net change between the existing and proposed conditions in the downstream reaches past a point approximately four miles from the Los Angeles County/Ventura County line.

The Draft EIS/EIR also incorporated by reference the previously certified Newhall Ranch environmental documentation. The HEC-RAS analysis included in Section 2.3 of the Newhall Ranch Revised Additional Analysis (ISI, 2003) considered flows to a point approximately four miles downstream of the Project site (four miles downstream of the Los Angeles/Ventura County line). The model results for the cross-section located approximately four miles downstream of the Project site (four miles downstream of the Los Angeles County/Ventura County line) illustrate that flows would not be altered beyond that point.

Data from the PACE 2008 analysis relied upon in preparation of the Draft EIS/EIR and from Section 2.3 of the Newhall Ranch Additional Analysis for the referenced downstream reach are presented in the tables below:

Average Hydraulic Parameters in Santa Clara River for the Reach Downstream of the Project Site (Located at a Point Approximately Four Miles Downstream of Project Site, Within Ventura County [HEC-RAS River Station-to-Station 3080-1000]) (PACE, 2008)

Alt. No.	Max Depth (ft)	Avg. Velocity (fps)	Friction Slope (ft/ft)	Area (sq.ft)	Top Width (ft)	Total Shear (psf)
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20-Year Storm Event						
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50-Year Storm Event						
Existing	11.6	7.0	0.0047	6658.2	968.5	2.32
Alt. 2	11.7	6.9	0.0048	6774.3	970.5	2.39

Average Hydraulic Parameters in Santa Clara River for the Reach Downstream of the Project Site (Located at a Point Approximately Four Miles Downstream of Project Site, Within Ventura County [HEC-RAS River Station-to-Station 3080-1000]) (PACE, 2008)

Alt. No.	Max Depth (ft)	Avg. Velocity (fps)	Friction Slope (ft/ft)	Area (sq.ft)	Top Width (ft)	Total Shear (psf)
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Existing	13.5	7.7	0.0046	8495.0	1053.7	2.66
Alt. 2	13.6	7.6	0.0047	8722.3	1056.0	2.85
Delta	0.1	-0.1	0.0001	227.3	2.3	0.19

Hydraulic Parameters (With Dissipation Downstream of County Line) in Santa Clara River for the Cross-Section Located Approximately Four Miles Downstream of Project Site, Within Ventura County [HEC-RAS River Station 1000]) (Sikand, July 14, 2000)

Discharge Frequency	Existing Q Total (cfs)	Proposed Q Total (cfs)	Change in Q (cfs)	Existing Velocity (ft/s)	Proposed Velocity (ft/s)	Velocity Increase (ft)	Existing Depth (ft)	Proposed Depth (ft)	Depth Increase (ft)	Slope (ft/ft)
2-Year	2700	2700	0	4.59	4.59	0	1.51	1.51	0	0.004
5-Year	8800	8800	0	6.84	6.84	0	3.04	3.04	0	
10-Year	15975	15975	0	8.41	8.41	0	4.33	4.33	0	
20-Year	25815	25815	0	9.94	9.94	0	5.74	5.74	0	
50-Year	43950	43950	0	11.47	11.47	0	8.05	8.05	0	
100-Year	62190	62190	0	13	13	0	9.66	9.66	0	
Capital Q	174200	174400	200	21.79	21.79	0	14.26	14.27	0.01	

Please also see revised **Section 4.1** of the Final EIS/EIR. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 7

The comment states that the Ventura County Watershed Protection District disagrees with the analysis provided in the Draft EIS/EIR because the model only considers flows in the Project area, and not downstream impacts. As discussed in previous responses, the analysis provided in the Draft EIS/EIR, **Section 4.1**, primarily relied on the Corps' HEC-RAS (River Analysis System, Version 3.1.2) water surface profile model to assess change in floodplain area and flows to evaluate impacts for each of the various Project alternatives, including variations in the areas that would be provided with bank stabilization and changes to tributaries located on the project site. A comprehensive summary of the

model results is provided in PACE Floodplain Hydraulics Impacts Assessment for the Santa Clara River (PACE, 2008). Contrary to the comment's characterization of the model's geographic parameters, the HEC-RAS model considers flows to a point approximately four miles downstream of the Project site, within Ventura County. Based on the analysis provided in the Draft EIS/EIR, the proposed Project and alternatives would result in less-than-significant impacts along the Santa Clara River and its tributaries relative to flooding/flood hazards and stormwater conveyance. Adoption of the recommended mitigation measures, in addition to those already adopted in conjunction with approval of the Specific Plan and Valencia Commerce Center (VCC) projects, would further ensure that impacts remain less than significant. Therefore, the proposed Project and alternatives would not result in significant unavoidable impacts with respect to surface water hydrology and flood control.

In addition, the Draft EIS/EIR incorporated by reference the previously certified Newhall Ranch environmental documentation. Specifically, the HEC-RAS analysis included in Section 2.3 of the Newhall Ranch Revised Additional Analysis (ISI, 2003) also considered flows to a point approximately four miles downstream of the Project site (four miles downstream of the Los Angeles County/Ventura County line). The data from the PACE, 2008 analysis and from Section 2.3 of the Newhall Ranch Additional Analysis for the referenced downstream reach are presented in the tables in **Response 3**, above. Please also see revised **Section 4.1** of the Final EIS/EIR.

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

Response 8

The comment requests that erosion control measures be implemented to minimize effects downstream of the Project site. The proposed Project would not result in significant impacts downstream of the Project site, in part, because the proposed Project incorporates several erosion control measures to mitigate potential secondary flood hazards downstream of the Project site. Specifically, debris within the Project area would be captured in debris basins designed in accordance with DPW requirements and require DPW review and approval prior to construction. These basins would incorporate the project design features described in the Newhall Ranch Specific Plan Sub-Regional Stormwater Mitigation Plan (Geosyntec, 2008 -- see Draft EIS/EIR, **Appendix 4.4**), which were developed to balance runoff and sediment loading to Project tributaries and the Santa Clara River.

In addition to the identified project design features, mitigation measures provided in Draft EIS/EIR **Section 4.1** (Surface Water Hydrology and Flood Control), would further reduce erosion and deposition impacts of the Project. Some of these measures were previously adopted in connection with approval of the Specific Plan and VCC projects and some of the measures are newly recommended for adoption. The applicable erosion control mitigation measures identified by the Draft EIS/EIR include: SP-4.2-2, SP-4.2-3, SP-4.2-5, SP-4.2-6, SP-4.2-7, SP-5.0-14, SP-5.0-16, SP-5.0-17, SP-5.0-18, SP-5.0-20, VCC-HY-2, VCC-HY-3, and HY-3(d). The full text of each of these measures is provided in the Draft EIS/EIR **Subsection 4.1.7**. Please also see revised **Sections 4.1** and **4.4** of the Final EIS/EIR.

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

Response 9

The comment requests that the Draft EIS/EIR specify the amount of area set aside for dedicated erosion control and flood facilities. The Draft EIS/EIR, **Section 2.0**, Project Description, identified the proposed RMDP erosion and flood control facilities. The types of facilities identified in **Section 2.0** include:

1. NPDES water quality treatment/detention basins (see **Figure 2.0-55** for the approximate locations of these basins within the study area);
2. Debris basis (see **Figure 2.0-58** for the approximate locations of these basins, which are proposed for various natural slope and tributary locales in the study area);
3. Bank stabilization and turf reinforcement mats (see **Figure 2.0-25** for the location of these improvements along the north and south banks of the Santa Clara River);
4. Modified, converted, and preserved tributary drainages (see **Figure 2.0-38** for the location of these improvements, including those areas proposed for conversion to buried storm drain); and,
5. Modified tributary drainage/jurisdiction areas (see **Figure 2.0-38** for the location of these areas, including the stabilized and engineered tributary drainages that are to be revegetated and where new drainage/jurisdiction is created).

(See also Draft EIS/EIR, **Table 2.0-7**, Major Infrastructure Proposed by RMDP.)

The precise locations of the water quality treatment/detention basis and debris basins, and the access routes to such basins would be defined by subsequent tract maps implementing the Specific Plan. Please also see revised **Section 2.0** of the Final EIS/EIR.

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

Response 10

The comment states that the Ventura County Watershed Protection District disagrees with the conclusion regarding the significance of the proposed Project's cumulative impacts on downstream areas, and requests that the methodology and reasoning used to arrive at the conclusion that impacts would not be significant be provided. As discussed above, the analysis provided in the Draft EIS/EIR, **Section 4.1**, primarily used the model results for change in floodplain area and flows to evaluate impacts for each of the various Project alternatives. A comprehensive summary of the model results is provided in PACE Floodplain Hydraulics Impacts Assessment for the Santa Clara River (PACE, 2008). The HEC-RAS model considers flows to a point approximately four miles downstream of the Project site, within Ventura County. In addition, the Draft EIS/EIR incorporated by reference the previously certified Newhall Ranch environmental documentation. Specifically, the HEC-RAS analysis included in Section 2.3 of the Newhall Ranch Revised Additional Analysis (ISI, 2003) also considers flows to a point approximately four miles downstream of the Project site (four miles downstream of the Los Angeles County/Ventura County line). The data from the PACE 2008 analysis and from Section 2.3 of the Newhall Ranch Additional Analysis for the referenced downstream reach are presented in the tables in **Response 3**, above. The model results for the cross-section located approximately four miles downstream of the Project site (four miles downstream of the Los Angeles County/Ventura County line) illustrates that flows would not be altered beyond that point as a result of the proposed Project. Please also see revised **Section**

4.1 of the Final EIS/EIR. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 11

The comment requests that the author be provided with copies of all engineering design plans for the flood control facilities contemplated by the proposed Project. Engineering design plans for such facilities on the Project site will be submitted to DPW, which has jurisdictional authority over the Project site. These plans would be submitted in conjunction with requests for site development associated with individual tract maps on the Specific Plan site. As a submittal to the County, these plans would be available for review by interested agencies and the public. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project. Because the comment does not raise an environmental issue, no further response is provided.