

023-CityofLosAngeles_LADOT_082609

From: "Sergio Valdez" <Sergio.Valdez@lacity.org>
To: Aaron.O.Allen@usace.army.mil; NEWHALLRANCH@dfg.ca.gov
Date: Wed, Aug 26, 2009 1:46 PM
Subject: Newhall Ranch Draft EIS/EIR SCH No. 200001102

Mr. Allen, the City of Los Angeles has the following comments (see attached) to the above referenced EIS/EIR. We look forward to working with you in addressing our concerns. If you have any questions please call me at 818 374-4690 or e-mail me.

1

Thanks

Sergio Valdez

CC: Jay.Kim@lacity.org; Faisal.Alserrri@lacity.org

CITY OF LOS ANGELES

CALIFORNIA

RITA L. ROBINSON
GENERAL MANAGER



ANTONIO VILLARAIGOSA
MAYOR

DEPARTMENT OF
TRANSPORTATION

100 SOUTH MAIN STREET, SUITE 1000
LOS ANGELES, CA 90012
(213) 972-8470
FAX (213) 972-8410

August 26, 2009

U. S. Army Corp of Engineers
Ventura County Field Office
Attention: Aaron O. Allen
2151 Alessandro Drive, Suite 110
Ventura, CA 93001

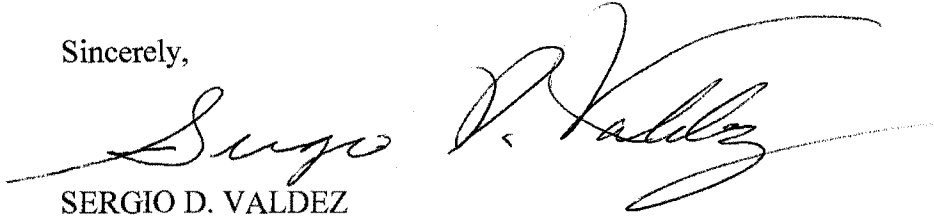
Subject: **Comments on the Draft EIS/EIR SCH No. 2000011025 for Newhall Ranch, Landmark Village, Located in the Newhall Ranch Specific Plan Area**

The City of Los Angeles Department of Transportation (DOT) has conducted a cursory review of the Draft EIS/EIR **SCH No. 2000011025** for the Landmark Village Project located in the Newhall Ranch Specific Plan Area of Los Angeles County as we have the following comments:

1. Due to short amount of time that the DOT has had to review this project we request that the comment period for this project be extended for several weeks. We would like an opportunity to comment on traffic during this extended review period. | 2
2. After a preliminary review of the traffic section of the Draft EIS/EIR, we have determined that the boundary of the study area, which is Calgrove and I-5 needs to be extended along the I-5, I-405 and I-210 to SR-118, along with parallel City street routes such as Balboa Boulevard, San Fernando Road, The Old Road, Foothill Boulevard and Sierra Highway. | 3
3. We need to evaluate and be involved with the freeway improvements planned by Caltrans for this project, especially those improvements within the City of Los Angeles boundaries. | 4
4. We need to further investigate the assumptions used in the traffic model to project traffic distribution in this traffic study. | 5
5. We need to ensure that the cumulative traffic impacts caused are mitigated and accounted in the future traffic studies. | 6
6. We need to review the Newhall Ranch Specific Plan as it pertains to the traffic element of this Draft EIS/EIR. | 7
7. We need to be included in any future Notices of Preparation and EIRs for additional projects that may be proposed in the area north of the Los Angeles City Limits. | 8

I would like to thank you very much for your help in this matter and if you have any questions please feel free to contact me at (818) 374-4690.

Sincerely,



SERGIO D. VALDEZ
Transportation Engineer
Department of Transportation

- C: Council District 7
- Council District 12
- Council District 2
- Gail S. Goldberg, Department of City Planning
- Gary L. Moore, Bureau of Engineering
- Detrich B. Alan, Department of Environmental Affairs
- Department of Fish & Game, Dennis Bedford

023. Letter from City of Los Angeles Department of Transportation, dated August 26, 2009

Response 1

The comment is an introduction to comments that follow. 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. Because the comment does not raise an environmental issue or address the adequacy of the Draft EIS/EIR, no further response is provided.

Response 2

The comment requests that additional time be provided for public review and comment. In response to this and other requests, the U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) extended the comment period for the Draft EIS/EIR. Please refer to **Topical Response 1: EIS/EIR Public Review Opportunities**. 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. Because the comment does not raise an environmental issue or address the adequacy of the Draft EIS/EIR, no further response is provided.

Response 3

The Draft EIS/EIR traffic impacts analysis study area includes all areas in which the proposed Project and alternatives potentially could result in significant impacts. Additionally, at the request of the City of Los Angeles, the study area was extended south of the Santa Clarita Valley and includes the I-5, I-405, I-210, and SR-118 freeways, Balboa Boulevard, San Fernando Road, The Old Road, Foothill Boulevard, and Sierra Highway. (Draft EIS/EIR, p. 4.8-13.) As shown in the Draft EIS/EIR, **Appendix 4.8**, Newhall Ranch RMDP and SCP EIS/EIR Traffic Analysis (December 2008), Figure 2, Study Area - Los Angeles County, the Project study area extends south of the Santa Clarita Valley and includes the north San Fernando Valley area, as requested by the comment. (Draft EIS/EIR, pp. 4.8-9.) Draft EIS/EIR **Figure 4.8-1** inadvertently omitted illustration of the full study area; the Final EIS/EIR replaces **Figure 4.8-1** with Figure 2 from the Newhall Ranch RMDP and SCP EIR/EIS Traffic Analysis in **Appendix 4.8**.

Consistent with the study area, Year 2030 traffic forecasts for the north San Fernando Valley area were calculated and Project impacts were evaluated. (See Draft EIS/EIR, **Appendix 4.8**, December 2008 Traffic Analysis, Figures 14, 16, 18, 20, 22, and 24.) The impacts analysis determined that the proposed Project, and each of the alternatives, would not result in significant impacts south of the Santa Clarita Valley area. (See, *e.g.*, Draft EIS/EIR, **Table 4.8-7** and p. 4.8-46.)

Response 4

As noted in **Response 3**, above, the Draft EIS/EIR traffic study evaluated freeways within the City of Los Angeles and determined that neither the proposed Project nor any of the alternatives would result in significant impacts to the I-5 south of the I-5/SR-14 confluence. (See, *e.g.*, Draft EIS/EIR, **Table 4.8-7** and p. 4.8-46.) As a result, freeway improvements within the City of Los Angeles are neither planned nor proposed as part of this Project.

Response 5

The trip distribution patterns utilized in the Draft EIS/EIR traffic impacts analysis for the Santa Clarita Valley were determined by the Santa Clarita Valley Consolidated Traffic Model (SCVCTM), which takes into account the types of land uses available onsite and in the surrounding land uses to derive the distribution patterns for proposed Project traffic. (Draft EIS/EIR, **Subsection 4.8.2.2**; County of Los Angeles Department of Public Works (DPW) (in association with City of Santa Clarita), Santa Clarita Valley Consolidated Traffic Model 2004 Update and Validation (March 2005) (SCVCTM Report). A copy of the SCVCTM Report is included in the Final EIS/EIR, **Appendix F4.8**.) The SCVCTM is a computerized travel demand model that derives trip distribution patterns and trip lengths based on mathematical functions that consider the amount of trips generated on a zone-by-zone basis, the type of trips generated, and the geographic relationship between these trips and the remainder of trips generated in the modeled area. (SCVCTM Report, Section 2.4, Trip Distribution.) Data input into the model includes details relevant to the specific land uses that ultimately would be facilitated in each travel analysis zone with implementation of the proposed Project. Outside of the SCVCTM area, including within the northerly San Fernando Valley study area, the Project's trip distribution patterns are derived based on the background traffic patterns in the area for long-range cumulative conditions. Project impacts are determined based on the net increase/decrease in traffic volumes, as determined by the SCVCTM at the cordon points (gateways) bounding the San Fernando Valley. The increased traffic volumes are distributed throughout the San Fernando Valley portion of the study area proportionate to the long-range cumulative condition traffic volumes on the study area roadways, and impacts are assessed based on the applicable significance criteria. (Please see **Topical Response 10: Vehicle Trip Distribution Methodology**, for additional information responsive to this comment.)

Response 6

The Draft EIS/EIR cumulative impacts analysis was prepared utilizing the Santa Clarita Valley Consolidated Traffic Model (SCVCTM) 2030 forecasts, and is based on build-out of the land uses identified in the Los Angeles County and Ventura County General Plans, the City of Santa Clarita General Plan, and growth in the adjacent communities. (Draft EIS/EIR, p. 4.8-9.) The SCVCTM land use database includes all approved General Plan projects, as well as proposed General Plan amendments. Additionally, regional growth, which is traffic volume increases occurring outside of the SCVCTM area, also is incorporated into the SCVCTM. (Please see **Response 22** to letter from TriCounty Watchdogs, dated August 22, 2009 (Letter 042), for additional information responsive to this comment.)

With respect to the comment regarding mitigation of the identified cumulative impacts, the Draft EIS/EIR, **Table 4.8-25**, presents a summary of the identified significant impacts. With implementation of the proposed mitigation measures, the impacts would be reduced to below significant. (See **Table 4.8-28** and **Table 4.8-29**.) Upon project approval, CDFG would adopt a mitigation monitoring or reporting program, pursuant to Public Resources Code section 21081.6, to ensure that the mitigation measures and project revisions it has adopted to mitigate or avoid significant impacts of the project are implemented, consistent with CDFG's regulatory jurisdiction under the California Endangered Species Act (CESA) and California Fish & Game Code section 1600 *et seq.* CDFG will also make all findings required by Public Resources Code section 21081 prior to making a final decision on the proposed Project.

Response 7

Since the comment does not raise any specific issues regarding the analysis provided by the Draft EIS/EIR, no additional response is provided. However, 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 8

Copies of all future notices related to the Newhall Ranch RMDP/SCP EIS/EIR will be provided to the City of Los Angeles, Department of Transportation. With respect to potential future projects that may be proposed in the area north of the Los Angeles city limits, it is not currently known what role CDFG or the Corps would play in the potential California Environmental Quality Act (CEQA) review of such projects. The City of Los Angeles, Department of Transportation should coordinate with the public agency that will have primary responsibility for preparing environmental review of such projects, *e.g.*, the County of Los Angeles.