

June 8, 2009

California Dept. of Fish and Game: Newhall Ranch EIR/EIS Comments

Attn: Dennis Beford

4949 Viewridge Ave.

San Diego CA 92123

Dear Mr. Beford:

Please help stop the madness. Los Angeles is a victim of urban sprawl, and it must not continue. Smart urban planning all over the country and the world suggests that we should stop building housing in fragile ecosystems, and stop building housing in outlying areas, which in addition to destroying the local ecosystem will require increased infrastructure, including the need for fire suppression, raising taxes. I am absolutely against this mindless and continuous expansion. The population of Los Angeles was only about 100,000 people in 1900, and now it's approaching ten million, rapidly, and expected to continue to grow exponentially over the next two decades. We are a city in crisis.

We are short on water and financial resources already. Do not allow Newhall Land and Farming to proceed with altering the course of the Santa Clara River for profit. Newhall Land and Farming is not committed to providing services which are in the best interests of the citizens of Los Angeles. They are trying to make money, and they are going about it the wrong way. They are following obsolete business models. They have not kept their promises in the past.

This is not just about complying with their requirements to protect endangered and threatened species. So go the animals, so go the people. Please stop the rape of our environment, and deny the request from Newhall Land and Farming from building new housing in the flood plan area of the Santa Clara River, which has been named as one of the nation's ten most endangered rivers. Make the right decision.

Sincerely,



Jennifer Olsen

4805 Burgundy Road

Woodland Hills CA 91364

818-421-7411

089. Letter from Jennifer Olsen, dated June 7, 2009

Response 1

The Corps and CDFG appreciate the comment provided in your letter regarding the proposed Project and its impacts to ecosystems and fire suppression. These issue areas received extensive analysis in the Draft EIS/EIR in **Section 4.5**, Biological Resources; and **Section 4.17**, Hazards, Hazardous Materials and Public Safety. In addition, for further responsive information, please see revised **Section 4.5** of the Final EIS/EIR. Your concerns regarding the proposed Project 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 content of the Draft EIS/EIR, no additional response is provided.

This comment indicates that the proposed Project would result in "urban sprawl." This comment does not address the adequacy of the information or environmental impact analysis provided by the Draft EIS/EIR; however, the following response is provided regarding the urban sprawl concern expressed by the commentor.

The environmental impacts of extending urban development onto the Newhall Ranch Specific Plan site were previously evaluated by the Newhall Ranch Specific Plan Program EIR and Final Additional Analysis for the Specific Plan and WRP (SCH No. 1995011015), which was certified by the Los Angeles County Board of Supervisors in 2003. The environmental effects of implementing the Specific Plan have also been evaluated by the Newhall Ranch Resource Management and Development Plan (RMDP) and Spineflower Conservation Plan (SCP) Draft EIS/EIR (SCH No. 2000011025). Through these environmental review efforts, the environmental effects of the proposed Project and the resulting extension of urban land uses onto the Project site have been analyzed and disclosed in a comprehensive manner.

There are many definitions of what constitutes "urban sprawl." A representative example comes from a 1998 Sierra Club Sprawl Report (<http://www.sierraclub.org/sprawl/report98/>), which defined urban sprawl as:

"Sprawl is low-density development beyond the edge of service and employment, which separates where people live from where they shop, work, recreate, and education -- thus requiring cars to move between zones."

As indicated by this definition, urban sprawl results in the development of low-density residential land uses, which, in the Project region, has often consisted of single-family, suburban-type development patterns. As indicated on Draft EIS/EIR, **Table 3.0-10**, Development Facilitated by RMDP Component of the Proposed Project (Alternative 2), implementation of the proposed Project would facilitate the development of 9,081 single-family dwellings and 11,804 multi-family dwelling units on the Newhall Ranch Specific Plan project site. On the Entrada portion of the Project site, 428 single-family units and 1,297 multi-family dwelling units would be provided. As proposed, more than one-half (58 percent) of the residential units facilitated by the implementation of the proposed Project would be multi-family units. Since a majority of the residential units that would be provided on the Project site would be multi-family units, the development facilitated by the Project would not reflect the low-density development patterns that have been typically associated with urban sprawl in the past.

One of the objectives of the RMDP and SCP is to facilitate the development of the Newhall Ranch Specific Plan, and an objective of the Specific Plan is to meet the regional demand for housing and jobs. The demand for jobs created by the development of the Specific Plan would be partially met with the build-out of the Valencia Commerce Center portion of the proposed RMDP/SCP Project, and by new commercial development that would be provided on the Specific Plan and Entrada project sites. In addition to providing employment opportunities on the Project site, essential public services such as schools, shopping and recreation facilities would also be provided. By including employment centers and public service land uses in the design of the proposed Project, automobile trips and total vehicle miles traveled resulting from work-related commute trips and trips to access public services would be minimized.

The proposed Project site is located adjacent to Interstate 5 (I-5) and State Route 126 (SR-126). Locating new urban development adjacent to these major transportation facilities eliminates the need for major roadway facility extensions, which has been a characteristic of urban sprawl in the past.

In conclusion, the proposed RMDP/SCP Project would facilitate the development of the Newhall Ranch Specific Plan, which was previously approved by Los Angeles County. Implementation of the proposed Project would result in an extension of urban land uses; however, the proposed new development would incorporate design elements that minimize the adverse environmental effects that have been commonly associated with urban sprawl in the past.

Response 2

The Corps and CDFG appreciate the comment provided in your letter regarding water supply and impacts to the course of the Santa Clara River. These issues were evaluated extensively in the Draft EIS/EIR, including **Section 4.2**, Geomorphology and Riparian Resources; and **Section 4.3**, Water Resources. In addition, for further responsive information, please see revised **Sections 4.2** and **4.3** of the Final EIS/EIR. Please also refer to **Topical Response 3: Natural River Management Plan Projects and Mitigation**, for additional information regarding the implementation of the projects described in that document. Your opinion regarding fiscal conditions 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 content of the Draft EIS/EIR, no additional response is provided.

Response 3

The Corps and CDFG appreciate the comment provided in your letter. Your opinion regarding biological resources, development in floodplain areas, and condition compliance requirements will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project. Please note that the Project's impacts to endangered and threatened species received extensive analysis in Draft EIS/EIR, **Section 4.5**, Biological Resources. Please also note that the Draft EIS/EIR provided extensive analysis regarding the Project's effects on floodplain areas and associated resources located on and off the Project site. This analysis is included in **Section 4.1**, Surface Water Hydrology and Flood Control; **Section 4.2**, Geomorphology and Riparian Resources; and **Section 4.6**, Jurisdictional Waters and Streams. The analysis provided in those sections indicates that Project-related impacts to the floodplain and its associated resources can be feasibly reduced to a less-than-significant level with the implementation of proposed mitigation measures. In addition, the Draft EIS/EIR evaluated an alternative to the proposed Project (Alternative 7) that substantially minimizes development within the 100-year

floodplain as it is delineated by the Federal Emergency Management Agency (FEMA). This is one of the alternatives the Corps and CDFG will consider before taking action on the proposed Project. We also acknowledge your statement regarding the American River's 2005 designation of the Santa Clara River as one of the nation's ten most endangered rivers. In addition, for further responsive information, please see revised **Sections 4.1, 4.2, 4.5, and 4.6** 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. However, because the comment does not address the content of the Draft EIS/EIR, no additional response is provided.