

**From:** Thomas Barron <barron@imageg.com>  
**To:** aaron.O.Allen@usace.army.mil  
**Date:** Thu, Jun 11, 2009 10:03 PM  
**Subject:** NEWHALL RANCH - RMDP comments

US ARMY CORPS OF ENGINEERS  
Re: Application No.: 2003-01264-AOA  
NEWHALL RANCH - RMDP testimony

Attn: Aaron O. Allen 805-585-2148

Dear Mr. Allen

I am a property owner immediately adjacent to the project area and have been "onsite" for the last 36 years. I have witnessed firsthand the many changes in the rural area as it transitions from orchards and open cattle range to increasing urbanization. I have given testimony against the Newhall Ranch project as well as the against the "natural river management plan" with its concomitant changes to the flow and course of the Santa Clara River.

1

My concern is first and foremost the effect on the habitat that is within the current river boundaries and your jurisdiction.

2

The applicant has a financial incentive to maximize the use of its areas under conventional subdivision construction and its Resource Management and Development Plan (RMDP) is in the service of this goal. My objection is with the design of the Master Plan of the community - which is classic suburban sprawl. The current plan is seriously "outdated" - especially in light of our new awareness of the climate crisis. This old thinking is creating the majority of the impacts here.

3

Although the County of Los Angeles has granted its "approval" of the overall concept (and with it the hope of adding another 28,000 new taxpayers to its sphere of influence) it does not have the same fiduciary role as you, the custodian of our public resources. You have the authority and the responsibility to "push back" the development and its impacts; please send this proposal back to the drawing board to protect our precious resources.

4

I choose the "no project" alternative as my personal preferred solution.

5

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**CC:** NEWHALLRANCH@dfg.ca.gov

**096. E-mail from Thomas Barron, dated June 11, 2009**

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**Response 1**

This comment expresses concern regarding historic land use changes in the Project region, opposition to the Natural River Management Plan (NRMP) project, and resulting changes to the "flow and course of the Santa Clara River." Concerns regarding past land use changes in the Project region are addressed by the Draft EIS/EIR in the evaluation of cumulative environmental impacts that is provided in **Section 6.0, Cumulative Impacts**. In addition, for further responsive information, please see revised **Section 6.0** of the Final EIS/EIR. In regard to the implementation of the NRMP, please refer to **Topical Response 3: Natural River Management Plan Projects and Mitigation**.

**Response 2**

The comment expresses a concern regarding habitat areas along the Santa Clara River that are under the jurisdiction of the Corps and does not address the adequacy of the analysis provided in the Draft EIS/EIR. **Section 4.5, Biological Resources**, and **Section 4.6, Jurisdictional Waters and Streams**, of the Draft EIS/EIR provide extensive analyses of existing habitat conditions and the Project' impacts to habitat areas located on the Project site. The comment does not raise any specific issues regarding the analysis provided in the Draft EIS/EIR; therefore, 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. In addition, for further responsive information, please see revised **Sections 4.5 and 4.6** of the Final EIS/EIR.

**Response 3**

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 comment.

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 4**

The Corps and CDFG appreciate the comment provided in your letter. 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.

This comment also indicates that the proposed Project would be occupied by approximately 28,000 new residents. Please note that Draft EIS/EIR, **Subsection 4.19.6.2.2**, Socioeconomics and Environmental Justice, indicates that it is estimated that approximately 57,903 people would occupy the Newhall Ranch Specific Plan portion of the Project site after it is built out.

Finally, CDFG is the State of California's trustee agency for fish and wildlife resources. (Fish & G. Code, §§ 1802 and 711.7, subd. (a); Pub. Resources Code, § 21070; Cal. Code Regs., tit. 14, § 15386, subd. (a).)

In that capacity CDFG holds fish and wildlife resources in trust for the people of the state, exercising jurisdiction over the conservation, protection, and management of those species and their habitat. CDFG also administers various permitting programs under the Fish and Game Code, two of which are involved in the present case. (Fish & G. Code, §§ 1600 *et seq.*, § 2081; Cal. Code Regs., tit. 14, §§ 783.0 *et seq.*, § 15251, subd. (o).) Managing California's diverse fish, wildlife, and plant resources, and their habitat, for their ecological values and their use and enjoyment by the public is CDFG's core mission. CDFG is and will fulfill its trustee mandate in the present case.

**Response 5**

The Corps and CDFG appreciate the comment provided in your letter. Your preference for the No Project alternative 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.