

California Department of Fish and Game  
 Newhall Ranch EIS/EIR Comments  
 4949 Viewridge Ave.  
 San Diego, CA 92123

Dear Dennis Bedford,

I am writing about the proposed Newhall Ranch project. First of all, the Newhall project concerns me, because our water supply which is already in trouble. And, with all of these houses would use up a lot more water and channeling the river's tributaries would prevent rain water from being absorbed into the ground and reduce our water supply.

Newhall Land and Farming and the Santa Clarita Chamber of Commerce have stated that the Newhall Ranch project will provide more jobs in Santa Clarita. Which is interesting since I have noticed that the higher numbered alternatives tends to remove more land from the commercial and industrial areas than the residential areas in order to make open spaces and Spine Flower reserves. However, I mainly wish to point out that creating more real estate for business in Santa Clarita will not create more jobs. Our current economic crisis is not caused by a shortage of business real estate, if it were the Valencia Industrial Center would not be filled with empty buildings. With the housing and commercial lease market in decline, I am also afraid that the Newhall Ranch project will result in lots of empty buildings. Because of this I ask that you not issue a permit until the economy recovers.

Newhall Land and Farming is in bankruptcy, which raises doubts about their ability to complete this project. No one wants to see the Newhall Ranch area look like a demolition zone because Newhall Land and Farming left the job unfinished. For this reason I ask that Newhall Land and Farming not be given a permit until they evidence of their ability to complete this project.

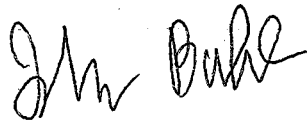
Newhall Land and Farming has a terrible environmental record. Newhall Land and Farming has failed to comply with a number of environmental mitigations that it has promised to do. I ask that you not give Newhall Land and Farming a permit until they comply with all past mitigation measures.

As your own documents make very clear the Newhall Ranch area contains a number of endangered and threatened species including the one which is most endangered the San Fernando Valley Spine Flower (*Chorizanthe parryi* var. *fernandina*). The Newhall Ranch area and in fact much of California exist in a rare and endangered biome the Mediterranean biome. There are only five of these biomes in the world all endangered and all with a high level of biodiversity. Conservation International has designated the California's Mediterranean biome along with California's Great Valley, the Sierra Nevadas, California and Oregon's Coastal Redwood Forests, and the Klamath Mountains as a Biodiversity Hotspot. Please consider this when making your decision.

For all of the reasons that I have given above I ask that you not grant Newhall Land and Farming a permit for the Newhall Ranch project. If you do decide to grant Newhall Land and Farming a permit please make the permit for Alternative 7.

Sincerely,

John Babb

A handwritten signature in cursive script, appearing to read "John Babb". The signature is written in dark ink and is positioned below the printed name.

**114 Letter from John Babb, dated June 26, 2009**

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**Response 1**

This comment expresses general concerns about water supply and the Project's effects related to groundwater recharge. These topics received extensive analysis in **Section 4.3**, Water Resources, of the Draft EIS/EIR. For example, the evaluation of the Project's impacts on groundwater supplies and groundwater recharge that is provided on page 4.3-86 of the Draft EIS/EIR states, in part:

"Groundwater recharge would not be substantially impacted by the water demands based on the best available information. This information shows that no adverse impacts on Basin recharge have occurred or would occur due to the existing or projected use of local groundwater supplies. Based on a memorandum prepared by CH2MHill (Effect of Urbanization on Aquifer Recharge in the Santa Clarita Valley, February 22, 2004; see **Appendix 4.3**), no significant impacts would occur to the groundwater basin with respect to aquifer recharge. Urbanization in the Santa Clarita Valley has been accompanied by long-term stability in pumping and groundwater levels and the addition of imported SWP water to the Valley; together, these actions have not reduced recharge to groundwater, nor depleted the amount or level of groundwater in storage within the local groundwater basin. These findings are also consistent with the CLWA/purveyor groundwater operating plan for the Basin (see EIS/EIR, **Appendix 4.3**, 2005 Basin Yield Report)."

Additional analysis of potential groundwater recharge impacts is also provided, including the following text from page 4.3-87 of the Draft EIS/EIR:

"Currently, portions of the Specific Plan area are irrigated agricultural land. Some of these areas would be developed for the proposed Project, introducing impervious surface over approximately 30 percent of the Project area. The reduction in irrigated agriculture and the increase in paved area would reduce overall recharge; however, several factors would serve to counter the impact of urbanization on groundwater recharge within the Specific Plan area:

- Development within the Specific Plan area would increase runoff volume discharged after treatment (*e.g.*, in water quality control facilities) to the Santa Clara River, whose channel is predominantly natural and consists of vegetation and coarse-grained sediments. The porous nature of the sands and gravels forming the streambed allows for significant infiltration to occur to the Alluvial aquifer underlying the Santa Clara River;
- Development of the Specific Plan area would significantly increase the area of irrigated landscaping on currently undeveloped land, which would serve to increase the amount of recharge to the area; and
- The groundwater supply for the Specific Plan post-development would not require an increase in groundwater pumping beyond the applicant's existing agricultural allocation (7,038 afy).

In addition, irrigation used in the Project area would increase the amount of recharge available to the Santa Clara River. Based on the above information, the Specific Plan impacts on groundwater recharge and levels would be less than significant relative to Significance Criterion 1."

Based on the analysis of potential groundwater recharge impacts summarized above and other analysis provided in **Section 4.3** of the Draft EIS/EIR, it was concluded that the proposed Project and the alternatives to the project would not result in significant impacts to groundwater levels in the Project area. In addition, for further responsive information, please see revised **Section 4.3** of the Final EIS/EIR.

## Response 2

This comment indicates that it is an objective of the Newhall Ranch project to provide more jobs in Santa Clarita, yet the higher number alternatives evaluated by the Draft EIS/EIR remove more land from commercial and industrial areas than in residential areas to provide more open area and area for spineflower preserves. Each successive alternative evaluated by the Draft EIS/EIR would decrease the amount of commercial and industrial area that would be provided by the Project. The largest decrease in commercial and industrial area occurs in Alternatives 4, 5, 6, and 7 because the Spineflower Conservation Plan considered under those alternatives would establish preserves that would preclude the build-out of the Valencia Commerce Center (VCC). Other decreases in commercial/industrial area that would occur under Alternatives 3 through 7 are commensurate with reductions in the number of housing units that would be provided.

Although the alternatives to the proposed Project would reduce commercial/industrial area provided on the Project site, such reductions are consistent with the purpose/objectives of the RMDP and SCP, which are the projects evaluated by the EIS/EIR. As indicated in Draft EIS/EIR, **Sections 2.1.3.2** and **2.1.3.3**, it is the overall goal of the RMDP to ". . . to provide a coordinated resource management and development plan, which, when implemented, would avoid or mitigate impacts to sensitive biological resources within the approved Specific Plan area, while permitting necessary infrastructure improvements." It is the goal of the SCP to: "...to develop a management and monitoring framework to ensure the long-term persistence of spineflower within the SCP study area through establishment of a system of preserves, and to authorize the take of spineflower in areas located outside of the designated preserves." While the implementation of the Newhall Ranch Specific Plan would help to meet the regional demand for housing and jobs, the Specific Plan objective of providing a jobs/housing balance is not an objective of the RMDP or the SCP projects evaluated by the Draft EIS/EIR.

## Response 3

This comment raises economic, social, or political issues related to current economic conditions, which do not relate to any physical effect on the environment. For the purposes of CEQA, State CEQA Guidelines section 15131, subdivision (a), indicates economic or social effects of a project shall not be treated as significant effects on the environment. 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 raise an environmental issue, no further response is provided.

#### Response 4

This comment refers to the Project applicant's bankruptcy proceedings and the ability of the applicant to complete the proposed Project. Please refer to **Topical Response 2: Bankruptcy-Related Comments**.

#### Response 5

The comment states that The Newhall Land and Farming Company "has a terrible environmental record" and "has failed to comply" with its mitigation requirements on past projects. Because the comment identifies no specific example of non-compliance, no additional response is provided. Please see **Topical Response 3: Natural River Management Plan Projects and Mitigation**.

#### Response 6

This comment addresses general concerns regarding special status species located on the Project site, which received extensive analysis in **Section 4.5, Biological Resources**, of the Draft EIS/EIR. In addition, for further responsive information, please see revised **Section 4.5** of the Final EIS/EIR. The comment does not raise any specific issues regarding the analysis provided by the EIS/EIR, therefore, no additional response is provided.

The comment also indicates that the Project site is located in a region referred to as the "Mediterranean biome." This comment does not address the adequacy of the biological impact analysis provided by the Draft EIS/EIR, however, the following information is provided related to the "Mediterranean biome."

Mediterranean type climates are characterized by modest annual precipitation, mostly falling in winter, with warm, often extended, dry summers and relatively mild winters (Cody 1986; Minnich 2007). These conditions are characteristic of five regions worldwide, exhibiting convergence in habitat types, high species diversity, and also high human populations and consequent land use conversions (Cody 1986). Thus, Myers *et al.* (2000) designated the five Mediterranean ecosystem regions as "biodiversity hotspots" in a much-cited report identifying a total of 25 "biodiversity hotspot" regions worldwide with high species diversity and regional endemism as highest priorities for global conservation planning. The "California Floristic Province" (*i.e.*, the western part of California and parts of adjacent Oregon and Baja California; Hickman 1993) was included among them.

The Santa Clara River is within the California Floristic Province, and, therefore, is a part of the biodiversity hotspot Myers *et al.* (2000) identified, though it is only a small portion of its total area. The California Floristic Province does support exceptionally high biodiversity, including many threatened and endangered plant and animal species, although only a small portion of these species are known or have potential to occur on or near the proposed Project site. Impacts of the proposed Project to biological resources on the Newhall Ranch site (*i.e.*, representative of the regional Mediterranean-type habitat), including potential impacts to rare, threatened or endangered plants and animals of the region, were analyzed in the Draft EIS/EIR, **Section 4.5, Biological Resources**.

These comments 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**

This comment expresses the opinion of the commentor that the applicant should not be granted a permit for the proposed Project, or if a permit is granted, that it be approved for Alternative 7. The Corps and CDFG appreciate the comment provided in your letter. Your opinion 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. Because the comment expresses an opinion regarding the Project and does not address the content of the Draft EIS/EIR, no additional response is provided.