

125-Lockhart_082409

From: Mary Ann Lockhart <jmal@frazmtn.com>
To: NEWHALLRANCH@dfg.ca.gov
Date: Mon, Aug 24, 2009 1:20 PM
Subject: comments on Newhall Ranch

To Whom It May Concern:

There is much to cause concern about the efforts re: Newhall Ranch development.		1
Adequate water for project?		
Impacts on the Santa Clara River?		2
Tax impacts on persons who will not be living in Newhall Ranch projects?		3
Traffic impacts on I-5		4
Need for such a set of developments?		5
This set of projects serves no real need for general public. Housing should be increased closer to present urban districts and should include much more exploration and development in infill areas in those urban districts.		6
For these reasons, these projects should be denied further permits for development.		7

Mary Ann Lockhart
PO GG
Frazier Park, CA 93222

125. Email from Mary Ann Lockhart, dated August 24, 2009

Response 1

The comment asks whether adequate water supplies are available to serve the proposed Project. This issue was analyzed in the Draft EIS/EIR, specifically **Section 4.3**, Water Resources. That analysis concluded that adequate water supplies are available to serve the proposed Project and alternatives. Please also refer to **Topical Response 5: Water Litigation and Regulatory Action Update**; **Topical Response 8: Groundwater Supplies and Overdraft Claims**; and **Topical Response 9: State Water Project Supply Reliability**. These topical responses provide additional information regarding the water supply for the proposed Project. In addition, please see revised **Section 4.3**, Water Resources, of the Final EIS/EIR.

The comment does not raise any specific issues regarding the analysis provided in the Draft EIS/EIR; therefore, no additional response is provided. 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 2

The comment asks whether the proposed Project would impact the Santa Clara River. The Draft EIS/EIR provided extensive information regarding the habitat and individual species located on the Project site, and assessed impacts to those resources that would result from the implementation of the proposed Project. Such analysis was presented in **Section 4.2**, Geomorphology and Riparian Resources, **Section 4.5**, Biological Resources, and **Section 4.6**, Jurisdictional Waters and Streams, of the Draft EIS/EIR. Please also refer to **Topical Response 11: River Corridor SMA/SEA 23 Consistency**. In addition, for further responsive information, please refer to revised **Sections 4.2**, **4.5**, and **4.6** of the Final EIS/EIR.

The comment does not raise any specific issues regarding the analysis provided in the Draft EIS/EIR; therefore, no additional response is provided. 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 3

The comment requests information on the tax impacts of the proposed Project on persons who do not reside within the Newhall Ranch Specific Plan. The tax implications of the Specific Plan are not under the purview of the U.S. Army Corps of Engineers (Corps) or the California Department of Fish and Game (CDFG). The fiscal impacts of the Newhall Ranch Specific Plan were already analyzed by Los Angeles County during the environmental review of the Specific Plan. These impacts were addressed in the "Revised Draft EIR for the Newhall Ranch Specific Plan and WRP (SCH No. 19955011015)" (March 8, 1999), in Section 6.0, Fiscal Impacts of the Specific Plan. This document is incorporated as a Draft EIS/EIR reference document in **Section 10.0**, References. Further, social effects of a proposed Project are not treated as significant effects on the environment in an EIS/EIR unless they cause or are related to a physical effect on the environment (see Cal. Code Regs., tit. 14, § 15131; 40 C.F.R. § 1508.14.). The economic issue raised in the comment does not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the Corps and CDFG prior to a final decision on the proposed Project. Because the comment does not raise an environmental issue, no further response is provided.

Response 4

The comment asks whether the proposed Project would result in traffic-related impacts to Interstate 5 (I-5). This issue received extensive analysis in the Draft EIS/EIR, specifically, **Section 4.8**, Traffic. That analysis concluded that impacts of the proposed Project would be reduced to a less-than-significant level with the implementation of proposed mitigation measures. For further responsive information, please refer to revised **Section 4.8**, Traffic, of the Final EIS/EIR.

The comment does not raise any specific issues regarding the analysis provided in the Draft EIS/EIR; therefore, no additional response is provided. 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

The comment asks whether there is need or demand for the development that would be facilitated by approval of the proposed Project. **Subsections 2.1.3.1**, **2.1.3.2**, and **2.1.3.3** of the Draft EIS/EIR, provide information regarding the overall purpose and need of the proposed Project, as well as the objectives of the RMDP and SCP. The comment does not raise any specific issues regarding the analysis provided in the Draft EIS/EIR; therefore, no additional response is provided. 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 6

Please see **Response 5**, above, regarding the purpose and need of the proposed Project. The comment states that the new residential land uses should be close to present urban districts and promote infill development. 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, 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 RMDP and SCP Draft EIS/EIR. 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. In addition, for information responsive to purpose and need of the proposed Project, please refer to the Corps' draft 404(b)(1) alternatives analysis found in **Appendix F1.0** of the Final EIS/EIR.

The comment implies that the Project would result in urban sprawl. 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 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 and 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.

The Corps and CDFG appreciate the comment provided, which 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 proposed Project and does not address the content or adequacy of the Draft EIS/EIR, no additional response is provided.

Response 7

The comment states that the Newhall Ranch Specific Plan should be denied further permits for development. The Corps and CDFG appreciate the comment provided, which 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 proposed Project and does not address the content of the Draft EIS/EIR, no additional response is provided.