127-Bevins_082509

From: Orson Bevins <orson.bevins@gmail.com>
To: NEWHALLRANCH@dfg.ca.gov
Date: Tue, Aug 25, 2009 4:40 PM
Subject: Newhall Ranch comment

Hello,
I am opposed to any development of the Newhall Ranch project. Having reviewed the draft EIR, I believe the project will affect the Santa Clarita River, associated watershed, and environment in a particularly desctructive way, considering the increasing rarity of pristine open spaces and farmland. There is no plausible way to adequately mitigate the all the negative effects to natural or human resources. 1

Furthermore, the cumulative effect of all developments of this kind have a significant impact to State water resources. In regards to runoff from newly installed impervious surfaces, it further degrades the watershed. Additional burden is placed on water supply from Northern California. The CO2 emitted from the inevitable commuting patterns (from this and other similar projects) contribute to climate change which scientists say is reducing Sierra snowpack levels. Anthropogenic positive climatic feedback is being accelerated and projects like these make this advancing calamity harder to stop. 2 3 4

A new housing project should occur in established urban areas that already have infrastructure in place and reduce the need for driving. Thank you for your consideration. 5

Sincerely,
Orson Bevins

127. Letter from Orson Bevins, dated August 25, 2009

Response 1

The U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) appreciate the comments provided in your letter. Potential impacts to the Santa Clara River and water resources were studied extensively in the Draft EIS/EIR, **Section 4.1**, Surface Water Hydrology and Flood Control; **Section 4.2**, Geomorphology and Riparian Resources; **Section 4.3**, Water Resources; **Section 4.4**, Water Quality; **Section 4.5**, Biological Resources; **Section 4.6**, Jurisdictional Waters and Streams; and **4.12**, Agricultural Resources. In addition, for further responsive information, please see revised **Sections 4.1**, **4.2**, **4.3**, **4.4**, **4.5**, and **4.6** of the Final EIS/EIR.

The opinion regarding the potential success of mitigation in general 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 specific mitigation measures presented in the Draft EIS/EIR, no additional response is provided.

Response 2

The cumulative impact on water resources is addressed in the Draft EIS/EIR, **Section 6.0**, Cumulative Impacts, **Subsection 6.5.3**, Water Resources. In addition, for further responsive information, please see revised **Section 6.0** of the Final EIS/EIR.

Response 3

Potential impacts resulting from runoff are addressed in the Draft EIS/EIR, **Section 4.1**, Surface Water Hydrology and Flood Control. The cumulative impact on water quality is addressed in the Draft EIS/EIR, **Section 6.0**, Cumulative Impacts, **Subsection 6.5.4**, Water Quality.

The comment addresses general concerns regarding overall adequacy of the State of California's water resources, a topic that received extensive analysis in the Draft EIS/EIR, including **Section 4.3**, Water Resources. 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.

Response 4

Impacts to water supplies due to climate change and the proposed Project's impacts on climate change are addressed in the Draft EIS/EIR, **Section 4.3**, Water Resources and **Section 8.0**, Global Climate Change, respectively. The water analysis states:

> "DWR released the 2007 State Water Project Delivery Reliability Report (August 2008). This Report updates the 2005 Delivery Reliability Report, and describes three areas of uncertainty to SWP delivery reliability: (a) the recent and significant decline in pelagic organisms in the Delta (open-water fish such as striped bass, Delta smelt, and longfin smelt); (b) climate change and sea level rise; and (c) the vulnerability and potential failure of Delta levees. The inclusion of new areas of uncertainty distinguishes the 2007 Delivery Reliability Report from earlier reports by including estimates of the potential

reductions to SWP delivery reliability due to the pelagic organism decline and future climate changes.

As described in the 2007 Delivery Reliability Report (August 2008), simulations to evaluate future (2027) SWP delivery reliability incorporate the current interim court-ordered operating rules related to Delta smelt and a range of possible climate change impacts to hydrology in the Central Valley. The interim operating rules for Delta smelt are simulated at a more restricted level and a less restricted level for Delta exports to provide a range of estimated water deliveries. Therefore, for 2007, two studies were conducted. For 2027, ten simulations were used to reflect the four assumed scenarios for climate change and the two levels of operating rules." (See, Draft EIS/EIR, pages 4.3-23 and 24.)

"**Further Discussion of Constraints.** A topic of growing concern for water planners and managers is global climate change and the potential impacts it could have on California's future water supplies. DWR's California Water Plan Update 2005 contains the first-ever assessment of such potential impacts in a California Water Plan. Volume 1, Chapter 4 of the Water Plan, *Preparing for an Uncertain Future*, lists the potential impacts of global climate change, based on more than a decade of scientific studies on the subject. In addition, please refer to **Section 8.0**, Global Climate Change, of this EIS/EIR, and, specifically, the appendices to that section. The appendix contains the best available information on the subject of global climate change and its effects on California's water supplies.

Changes in Sierra snowpack patterns (the source of the SWP's water supply in Lake Oroville), hydrologic patterns, sea level, rainfall intensity, and statewide water demands are all possible should global climate change prove to be increasing through time. Computer models (such as CALVIN) have been developed to show water planners what types of effect climate change could have on the water supply. DWR has committed to continue to update and refine these models based on on-going scientific data collection, and to incorporate this information into future California Water Plans, so that agencies like CLWA and the purveyors can plan accordingly.

DWR's 2007 State Water Project Delivery Reliability Report (August 2008) also addresses global climate change and its effects on the state's water resources, particularly the SWP's ability to deliver water. For the SWP, climate change has the potential to simultaneously affect the availability of source water, the ability to convey water, and users' demands for water. These potential effects are described further in the 2007 Delivery Reliability Report (August 2008), pp. 29-36." (See, Draft EIS/EIR, pages 4.3-25 and 26.)

For further responsive information, please refer to revised **Section 8.0**, Global Climate Change, of the Final EIS/EIR, including the revised appendices (Final EIS/EIR, **Appendix F8.0**), and revised **Section 4.3**, Water Resources, of the Final EIS/EIR.

In regard to the evaluation of CO_2 emissions from vehicle trips generated by the Project, the number of trips that would be generated by the Project were estimated and average trip lengths were used to estimate

total vehicle miles traveled. Based on that data, CO_2 emissions from vehicle trips were calculated. The Draft EIS/EIR calculated vehicle miles traveled based on the Santa Clarita Valley Consolidated Traffic Model (SCVCTM). The SCVCTM is a computerized travel demand model that utilizes a sophisticated trip distribution function that derives geographically defined travel patterns from zonal trip generation estimates.

Response 5

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.