
010. Letter from Central City Association, dated February 10, 2017

Comment No. 010-1:

Please see attached letter of support. Thank you, Marie

Response No. 010-1:

This comment introduces the attached comment letter, which is addressed in the following comment and response. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 010-2:

Established in 1924, the Central City Association is Los Angeles' premier advocacy organization comprised of 400 members who employ over 300,000 people in the region. We recognize the critical role of new housing to promote our economy and strongly support Newhall Ranch.

As California's population grows and our economy rebounds, housing is not keeping pace. California is facing a housing crisis. We continue to have the second lowest homeownership rate in the nation. Five of the eight metropolitan areas with the lowest rates of homeownership are located here in our state. 50 percent of moderate-income and 100 percent of low-income families struggle to afford the cost of living in their local communities. The most vulnerable of them risk joining the 134,000+ Californians who are already homeless on any given night.

This crisis affects more than just residents: the state loses \$140 billion per year in output (or 6 percent of state GDP) due to the lack of affordable housing. Rents and mortgages within the reach of working families are critical to maintaining California's business competitiveness. CCA believes that California needs to increase the supply of housing options affordable to workers, so companies can compete for the talent that drives California's economy.

Newhall Ranch is a sustainable and net zero development and will deliver on California's unmet housing needs, building 21,500 new housing units at buildout. This much-needed housing will include a wide variety of prices and sizes, including affordable housing. Additionally, Newhall Ranch is an incredible investment in our region. I will create 60,000 new jobs, 11.5 million square feet of job generating uses and represents \$12.7 billion total development investment.

We are proud to strongly support Newhall Ranch and appreciate your consideration.

Response No. 010-2:

This comment also provides information regarding the organization that authored **Letter No. 010**. This comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the housing, including affordable housing, and employment generation resulting from the development associated with the project. The comment also expresses support for the programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

011. Letter from Climate Action Reserve, dated February 8, 2017

Comment No. 011-1:

Please see the attached letter regarding the Newhall Ranch Draft AEA. Thank you for the opportunity to respond

Response No. 011-1:

This comment introduces the attached comment letter. The comments set forth in the attached letter are addressed below (see **Comment Nos. 011-2** through **011-5** and their corresponding responses). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 011-2:

On behalf of the Climate Action Reserve, I am writing in support of Newhall Ranch's innovative commitment to fully mitigate the net GHG emissions from the Newhall Ranch development, making it an example for climate-friendly communities in California.

Response No. 011-2:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 011-3:

The Climate Action Reserve is the premier carbon offset registry for the North American carbon market. Our Governing Board members include individuals from academia, government, environmental organizations and industry, including Linda Adams, former Secretary for the California Environmental Protection Agency; John Laird, California Secretary for Natural Resources; Tim Profeta, Director of the Nicholas Institute for Environmental Policy Solutions at Duke University; and Jeffrey Kightlinger, General Manager at the Metropolitan Water District of Southern California.

Response No. 011-3:

This comment provides information regarding the organization that authored **Letter No. 011**. No further response is required.

Comment No. 011-4:

As you know, Newhall Ranch will implement a variety of on-site and off-site GHG reduction measures to support its goal of net zero GHG emissions. The Climate Action Reserve is working with Newhall to develop and implement protocols for quantifying and registering GHG reductions resulting from direct investments in off-site GHG reduction projects, such as methane capture, forest preservation and clean cookstove programs. The protocols will ensure the GHG reductions meet the requirements under CEQA for GHG mitigation. And, to ensure that these activities are undertaken in a rigorous and transparent manner, the Reserve will oversee a program where independent third parties will confirm the implementation and accurate quantification of the emission reduction activities.

Response No. 011-4:

This comment provides information regarding how the author of the letter is assisting the project applicant to implement the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions, including implementation of CO₄ capture, forest preservation, and clean cookstove GHG reduction programs

throughout the world. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. O11-5:

As the fifth largest economy in the world, California has already demonstrated that growing economically while addressing climate change is not only possible, it is a sound “win-win” investment for our future. We commend Newhall for pioneering this new greenhouse gas mitigation program and urge your support for this commitment to net zero developments.

Response No. O11-5:

The comment expresses support for the project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

012. Letter from Climate Resolve, dated February 8, 2017

Comment No. 012-1:

Attached please find a comment letter on Newhall Ranch Draft AEA (SCH No. 2000011025). A copy is also in the mail. Please let me know if this will work and if you'll need anything else.

Response No. 012-1:

This comment introduces the attached comment letter, which is addressed in the following comment and response. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 012-2:

I am writing on behalf of Climate Resolve, Los Angeles' climate change organization.

Our organization enthusiastically supports Newhall Ranch Project's unprecedented commitment to reduce to net zero its construction and operational greenhouse gas emissions. This project's climate mitigation effort breaks new ground in combating climate change.

Climate Resolve is dedicated to creating real, practical solutions to meet the climate challenge in the Los Angeles area by implementing practical means of reducing greenhouse gas emissions and local air pollution, as well as preparing for climate change impacts.

As part of Newhall's effort to achieve this landmark net zero goal, Climate Resolve is partnering with FivePoint to implement energy efficiency building retrofit programs at locations across Los Angeles County. And we're happy to report that we are focusing the mitigation projects to take place in communities designated as disadvantaged by CalEPA's CalEnviroScreen. This work is central to our mission, and we're very pleased to have FivePoint standing beside us in our efforts.

Bringing greenhouse gas emissions to zero is a landmark moment for development in California and the United States. Climate Resolve appreciates this opportunity to create climate solutions that benefit low-income communities, the very communities most at risk from climate impacts.

Given the recent changes in federal government, we view the best way to address the climate crisis right now is with local projects that directly reduce our dependence on fossil fuels and prepare the region to become more climate-resilient into the future.

It is our sincere hope that the California Department of Fish and Wildlife approves of Newhall's exemplary net zero plan.

Response No. 012-2:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. This comment provides information regarding the organization that authored **Letter No. 012**. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

013. Letter from ClimateCo Corporation, dated February 9, 2017

Comment No. 013-1:

Please see attached for your review.

Should you have any concerns, please do not hesitate contacting me.

Response No. 013-1:

This comment introduces the attached comment letter. The comments set forth in the attached letter are addressed below (see **Comment Nos. 013-2** through **013-4** and their corresponding responses). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 013-2:

On behalf of ClimeCo, I am writing in support of the Newhall Ranch project commitment to fully mitigate the project's net GHG emissions. We are excited to partner with Newhall and its parent FivePoint to explore options for developing methane capture programs at dairy farms in California. Methane capture has been recognized as an important element leading to achievement of the state's GHG reduction objectives.

Response No. 013-2:

This comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs, specifically development of CO₄ capture programs at dairy farms in California, to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 013-3:

At ClimeCo, we work with our corporate and investor partners to develop and implement carbon reduction measures both at our partners' facilities and at remote sites, amplifying our mission to achieve meaningful reductions in emissions and helping to achieve the state's goals in addressing climate change. We also develop emission reduction credit strategies that help organizations realize the maximum value of their environmental assets, as well as provide a variety of compliance services regarding AB 32, including auction strategy and implementation, risk management, site-specific evaluations to mitigate CO₂ emissions and various transaction services.

ClimeCo holds a diverse portfolio of voluntary carbon offsets, including GHG emissions abatement system projects, commodity brokering of voluntary offsets and identification of internal reduction opportunities. For example, ClimeCo recently partnered with Chevrolet and CF Industries to reduce Chevrolet's carbon footprint and benefit future farmers in partnership with the National Future Farmers of America Foundation.

In addition, in 2015 alone, ClimeCo transacted over 5 million offsets. In total, over 15 million carbon credits have been issued by emissions abatement projects directly under ClimeCo's management. ClimeCo's current projects generate approximately 3 million offsets annually, positioning ClimeCo as the United States' leading voluntary offset producer.

Response No. 013-3:

This comment provides information regarding the organization that authored **Letter No. 013**. No further response is required.

Comment No. 013-4:

We look forward to the approval of the Net Zero Newhall program and the Newhall Ranch project.

Response No. 013-4:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area, as well as the Net Zero Newhall proposal. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

014. Letter from College of the Canyons, dated February 10, 2017

Comment No. 014-1:

Please see attached letter of support.

Response No. 014-1:

This comment introduces the attached comment letter and expresses specific support for the project.

Comment No. 014-2:

College of the Canyons is a two-year community college that has served the Santa Clarita Valley for more than 45 years by helping students transfer to four-year universities, teaching the skills needed for successful careers in the workforce, and collaborating with local business and industry to enhance the economic development of the region.

Our dynamic community has grown over the years, and we have worked to keep pace in meeting its evolving needs. As the local population increased, we expanded our staff and facilities to match the growing demand for access to higher education. At the same time, we partnered with local companies to provide employee training and development to ensure they remained competitive in their respective fields.

We enjoy an outstanding quality of life in Santa Clarita that is matched by few other communities in Southern California. College of the Canyons is committed to promoting the sustainable practices that ensure our community remains a desirable place to live and work for decades to come.

Our focus on sustainability is reflected in our operations, as well as our educational focus. In recent years, we have retrofitted campus lighting to use less energy, updated our heating and air conditioning systems to operate more efficiently, and added biodiversity elements to our facilities master plans that will guide future landscaping and development as we continue building and remodeling facilities on both campuses.

Response No. 014-2:

This comment provides information regarding the organization that authored Letter No. 014. No further response is required.

Comment No. 014-3:

The plans that we have seen for Newhall Ranch match our institution's commitment to sustainability and environmental stewardship. The Net Zero Newhall initiative commits to eliminate all net greenhouse gas emissions, an impressive goal that will no doubt inspire other organizations to evaluate and enhance their own environmental practices.

Response No. 014-3:

This comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 014-4:

As the project is developed, we look forward to learning more about it, as well as exploring partnership opportunities between Newhall Ranch and the Santa Clarita Environmental Education Consortium (SCEEC). College of the Canyons is a founding member of SCEECE, which was established to provide resources for educators and students to promote environmental literacy in the Santa Clarita Valley. Our students would benefit from learning more about the specific features included in the Net Zero Newhall Plan, including

energy efficient building standards, electric vehicle charging stations, bike share programs and the planned retrofiting of public buildings in underserved parts of Los Angeles County.

We appreciate the opportunity to provide on our perspective on this project, which will mark a major step forward in the continued development of our community.

Response No. O14-4:

The comment expresses support for the project. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions as well as future educational opportunities that may be available with the implementation of the Net Zero Newhall proposal. This comment is noted for the record and is included for review and consideration by the decision-makers.

015. Letter from C-Quest Capital LLC, dated February 8, 2017

Comment No. 015-1:

Please find attached a letter to the California Dept. Of Fish and Wildlife on behalf of C-Quest Capital. Please let me know if you have any questions.

Response No. 015-1:

This comment introduces the attached comment letter, which is addressed in the following comment and response. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 015-2:

On behalf of C-Quest Capital, I am writing in support of the Net Zero Greenhouse Gas program for the Newhall Ranch Project. This net zero initiative will reduce all of the project's construction and operational greenhouse gas emissions to zero.

We are excited to partner with Newhall to implement clean cookstove GHG reduction programs. More than three billion people globally rely on burning woody fuels over smoky three-stone fires, often cooking in poorly ventilated spaces like enclosed windowless kitchens. In addition to driving climate change and deforestation, inhaling toxic particulate matter in smoke from open fires causes more deaths of women and children than tuberculosis, malaria and HIV Aids combined. A new efficient cookstove emits an average of two tonnes less carbon dioxide per year than using a three-stone fire, while simultaneously reducing household air pollution by 50 percent and reducing the time spent gathering resources by 75 percent.

This type of partnership is central to our mission. We depend on financial commitments from entities such as Newhall to achieve our goals of transforming the lives of the poorest communities in developing countries by providing access to clean efficient energy technologies and sustainable fuels. We have developed clean cookstove programs throughout the developing world, including in Haiti, Guatemala, Mexico, Cambodia, Laos, Zambia, Nigeria and Malawi. As you review this project, we hope you will consider the many positive effects it will have on global warming and communities in need.

Response No. 015-2:

This comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions, including the implementation of clean cookstove GHG reduction programs throughout the world. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

016. Letter from Endangered Habitats League, dated January 31, 2017

Comment No. 016-1:

Endangered Habitats League (EHL) appreciates the opportunity to submit comments on the most recent environmental documents for this proposed project. For your reference, EHL is Southern California's only regional conservation group.

Response No. 016-1:

This is an introductory comment to comments that follow and expresses appreciation for the opportunity to submit comments. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers. No further response is required.

Comment No. 016-2:

EHL is opposed to this automobile-dependent development which is located far to close to the Santa Clara river and its sensitive habitats and species.

Response No. 016-2:

This comment expresses general opposition to the nature and location of the project in relation to the Santa Clara River. It does not raise a specific criticism of the AEA. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

It should also be noted that the 2010 Final EIR analyzed the project's impacts on special-status fish species. This analysis was upheld as adequate by the California Supreme Court, although two mitigation measures – BIO-44 and BIO-46 – were deemed invalid due to conflicts with Fish and Game Code section 5515. As explained in the AEA, the "No Water Contact" approach to bridge construction was developed expressly to avoid impacts to sensitive fish species, including the unarmored threespine stickleback, and eliminate the need for Mitigation Measures BIO-44 and BIO-46. The AEA fully evaluates whether and to what extent the revised construction approach will affect the aquatic environment of the Santa Clara River. (See Draft AEA, pp. 3-1 to 3-40.) Finally, any effort to move the project likely would trigger additional environmental effects that would have to be evaluated. Given that the project's current location and alternatives thereto have been extensively analyzed in accordance with CEQA, no further analysis is required.

Comment No. 016-3:

We are deeply skeptical over claims of net zero GHG emissions and do not find the proposed condition enforceable or effective in ensuring that emissions are reduced as claimed.

Response No. 016-3:

This comment expresses skepticism regarding the project's commitment to achieve zero net GHG emissions and the enforceability and effectiveness of the GHG emissions reduction program. The comment does not provide any evidence to support this statement nor does the comment identify a specific deficiency in the Draft AEA analysis.

The Draft AEA includes detailed and extensive technical analysis and modeling, all of which was subject to independent review and evaluation by two technical experts: Ascent Environmental, Inc., CDFW consultant, and ARB. As memorialized in a letter from the CARB to CDFW, dated November 3, 2016 (a copy of which is included in Final AEA Appendix 1):

ARB staff consulted with Department of Fish and Wildlife staff and technical experts at Ascent Environmental, the principal consultant assisting the Department. In doing so, ARB staff reviewed the technical documentation provided for the evaluation of the project's total estimated GHG emissions and the reductions in emissions to be achieved through the mitigation measures. Based

on staff's review, ARB finds the documentation provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.

CARB's finding that the project's GHG emission reduction calculations are documented by "an adequate technical basis" is part of the body of substantial evidence that supports the AEA's GHG emissions analysis, particularly as CARB is the state agency designated with the responsibility for and expertise to implement statewide policy on global climate change and the reduction of GHG emissions.

Please see **Responses to Comments Nos. 09-19, 09-24, 09-25, and 09-32** for detailed discussion of the implementation and enforcement of the mitigation measures related to ZNE standards, EV charging stations and subsidies, and the GHG Reduction Plan. Please also see **Response to Comment No. IE15-4**, which discusses the means by which GHG emissions mitigation measures will be enforced. All elements of the mitigation measures are fully enforceable under the MMRP and the AEA's conclusion that the project will result in net zero GHG emissions is supported by substantial evidence.

Comment No. 016-4:

Thank you for considering these comments

Response No. 016-4:

This comment concludes the letter. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

No further response is required.

017. Letter from Finite Carbon, dated February 8, 2017

Comment No. 017-1:

Please find Finite Carbon's attached public comment letter.

Response No. 017-1:

This comment introduces the attached comment letter, which is addressed in the following comment and response. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 017-2:

I am the President of Finite Carbon and I am writing in support of the Net Zero Greenhouse Gas initiative to be implemented by Newhall Ranch.

We are working with Newhall to evaluate options for implementing forest conservation GHG reduction projects in California and the United States through reforestation, avoided conversion and improved management techniques.

At Finite Carbon, we work with landowners and our partners in every step that leads to carbon reduction through forest conservation, including feasibility studies, carbon inventories, management plans and verification of afforestation. Finite Carbon has six professional foresters on staff, and received the nation's first CARB forest carbon offsets. To date, we have developed 30 Improved Forest Management projects approved by CARB on 1.7 million acres of US forests. We are also an active member of the Society of American Foresters, Association of Consulting Foresters, Land Trust Alliance, Forest Guild and Forest Landowners Association. We enthusiastically support the Newhall Ranch Net Zero Greenhouse Gas Program, which will set a new standard for environmental responsibility in California.

Response No. 017-2:

This comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions, including the implementation of forest conservation GHG reduction projects within California and the United States. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

018. Letter from Habitat for Humanity SF/SCV, dated February 10, 2017

Comment No. 018-1:

Please find attached a letter from Habitat for Humanity San Fernando/Santa Clarita Valleys regarding Newhall Ranch.

Response No. 018-1:

This comment introduces the attached comment letter. The comments set forth in the attached letter are addressed below (see **Comment Nos. 018-2** through **018-4** and their corresponding responses). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 018-2:

Habitat for Humanity San Fernando/Santa Clarita Valleys' (SF/SCV) mission is to build affordable homes for low-income civilian and veteran families, and provide services that empower them to build brighter futures as homeowners. We are currently building 78 homes in Santa Clarita for low-income veterans and their families. As an affordable housing builder dedicated to providing homeownership to low-income families, we recognize the critical need for self-sufficiency, first-time homebuyer education, and sustainability. We are also committed to well-building and environmentally appropriate design with ample open space.

Response No. 018-2:

This comment provides information regarding the organization that authored **Letter No. 018**, and also serves as an introduction to the comments that follow, which are addressed in the responses below. No further response is required.

Comment No. 018-3:

It is our understanding that Net Zero Newhall, to be delivered by FivePoint in Newhall Ranch, will create more than 20,000 homes in Santa Clarita using innovative green building practices, protecting 10,000 acres of open space, and reducing or mitigating all net greenhouse gas emissions from the project and its construction to zero. "This much-needed housing will include a wide variety of prices and sizes, including affordable housing."

Response No. 018-3:

The comment correctly indicates that the Net Zero Newhall proposal and its programs would reduce, mitigate, and offset 100 percent of the project's GHG emissions, allowing the project to achieve net zero GHG emissions. The comment also describes the housing that would be provided as part of the development associated with the project, including affordable housing and expresses support for the preservation of open space. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 018-4:

Habitat for Humanity SF/SCV stands as an affordable housing advocate and recognizes the need for more affordable housing in the Santa Clarita Valley that produces jobs, preserve open space, and is sustainable. We applaud you efforts.

Response No. 018-4:

The comment provides information regarding the organization that authored **Letter No. 018**. The comment also expresses support for the project and its efforts to produce jobs, preserve open space, and to develop a sustainable project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

019. Letter from Henry Mayo Newhall Hospital, dated January 6, 2017

Comment No. 019-1:

Henry Mayo Newhall Hospital is a non-profit community hospital and trauma center that has served the Santa Clarita Valley for more than four decades. The health of our institution and the people we serve is closely tied to the health of our community, so we are deeply invested in the long-term prosperity and well-being of the Santa Clarita Valley.

Response No. 019-1:

The comment provides information regarding the organization that authored Letter No. 019. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 019-2:

For this reason, we give our strong support to Five Point's plans for Newhall Ranch and the net Zero Newhall initiative.

Newhall Ranch is a far-sighted, master-planned community that will add tremendous vitality to the Santa Clarita Valley by creating 11.5 million square feet of new office, retail and other commercial space, adding tens of thousands of jobs to our region. A strong economy and steady employment growth supports high quality and comprehensive health care in our region.

Additionally, our community's need for a wide range of housing, including affordable, will be eased by the development of up to 21,500 homes. And, the substantial tax revenue to come from this project, totaling more than \$800 million a year at build out, will greatly aid the public services that our hospital depends on, such as paramedic and emergency services.

As a promoter of public health, we appreciate Newhall Ranch's numerous contributions to healthy lifestyles. This includes creating a walkable community, much like Valencia, with an active bike share program. We also applaud the preservation of two-thirds of the community's total area as open space -some 10,000 acres - as well as 50 miles of public trails and a nature preserve totaling nine square miles, funded in perpetuity by a \$13 million endowment.

Finally, the Net Zero Newhall initiative sets an encouraging new standard of environmental responsibility by committing to eliminate all net greenhouse gas emissions, a leading cause of global climate change. This is an impressive commitment that will help spur the adoption of numerous green technologies in the Santa Clarita area, including zero-emission electric vehicles, which will help reduce air pollution and improve respiratory health in the area.

We have long-standing relationships with many of the Newhall Ranch project leaders at Five Point stemming from their successful work on Valencia. This is a talented professional team, and thanks to their efforts we have full confidence that Newhall Ranch will prove to be an enduring contribution to a healthier Santa Clarita Valley.

Response No. 019-2:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the employment generation, housing development, and the new tax revenues associated with the project as well as the project's contributions to healthy lifestyles, the preservation of open space, and the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

020. Letter from Los Angeles Chamber of Commerce, dated February 13, 2017

Comment No. 020-1:

Please see attached for the letter of support for the Newhall Ranch from the Los Angeles Area Chamber of Commerce.

Response No. 020-1:

The comment introduces the attached comment letter, which is addressed in **Comment No. 020-2** and its corresponding response. The comment also expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 020-2:

On behalf of the Los Angeles Area Chamber of Commerce, which represents more than 1,650 organizations and 650,000 employees in the region, I am writing to express our thoughts and support for the Landmark Village and Mission Village developments.

Landmark Village and Mission Village, as part of Newhall Ranch, will be an asset to our community through economic development and housing for the community while working to lower greenhouse gas emissions for the region. The Newhall Ranch Community, at buildout, will create 60,000 new and permanent jobs, generate \$388 million in property taxes, and \$410 million in income taxes. Newhall Ranch will also create 11.5 million square feet of job generating uses, which will help the region thrive economically.

Housing is an ongoing issue in Los Angeles and in the state, especially housing that is affordable and conveniently located for residents. With this new development, residents can enjoy living and working in the same community, eliminating the need for long commutes which leads to higher quality of life.

The Newhall Ranch Community is focused on preserving open spaces and lowering greenhouse gas emissions through the use of sustainability-friendly materials and state of the art energy efficiency designs. With this in mind, 10,000 acres of the 15,000 acres of the community will be designated open space for the community to enjoy, which will be preserved by the \$13 million endowment made by Net Zero Newhall. Only one third of the entire property will be developed. In addition, the community embrace sustainability by including solar panels and electrical charging stations in their residences.

Newhall Ranch's ambitious plan to build a community of this size while fostering economic growth and promoting sustainability is the first of its kind and will serve as a model for years to come. The Chamber supports the development and believes this is a great opportunity to create economic growth and housing while making a positive impact on our environment.

Response No. 020-2:

This comment provides information regarding the organization that authored **Letter No. 020**, and also expresses support for the Mission Village and Landmark Village projects proposed for the Newhall Ranch Specific Plan site, which are located within the RMDP/SCP project area. The comment also expresses specific support for the employment generation, housing, including affordable housing, and additional tax revenue resulting from the development associated with the project. The comment also expresses specific support for the preservation of open space and the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

021. Letter from Mary Leslie, Los Angeles Business Council, dated February 13, 2017

Comment No. 021-1:

On behalf of the Los Angeles Business Council (LABC), I'm writing to give my strong support for the Newhall Ranch project. The LABC represents over 400 member businesses in the greater Los Angeles area working to promote economic and environmental sustainability. This project has many features that we are enthused about. This project will bring many good things to the community, both environmentally and to the local business community. When the full Newhall Ranch community is complete, it will have created 60,000 new jobs, 21,500 homes, and hundreds of millions in tax revenue every year. Bringing more people to the area means more patrons for local businesses, and an ample supply of housing to attract new industries. Bringing jobs closer to where people live can also ease traffic, which is a known drain on productivity. A major driver of our support is Newhall's commitment to curbing greenhouse gas emissions by developing a net zero community. As we move forward to achieve California's [sic]

Response No. 021-1:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. This comment also provides information regarding the organization that authored **Letter No. 021**, as well as specific support for the employment generation, housing, and additional tax revenue resulting from the development associated with the project. The comment also expresses support for the commitments being made to ease traffic congestion, and the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

022. Letter from NAIOP, dated February 13, 2017

Comment No. 022-1:

Attached are comments NAIOP wants to introduce into the record regarding the Newhall Net Zero project. Thank you for considering our comments.

Response No. 022-1:

The comment introduces the attached comment letter. The comments set forth in the attached letter are addressed below (see **Comment Nos. 022-2** through **022-4** and their corresponding responses). The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 022-1:

NAIOP, the Commercial Real Estate Development Association, is the leading national organization of developers, owners, and related professionals in office, industrial and mixed-use real estate. NAIOP advances responsible commercial real estate development, researches trends and innovations, and advocates for effective public policy. The NAIOP SoCal Chapter serves Los Angeles and Orange Counties and is the third largest chapter in the United States with a membership of over 1,000 members.

Response No. 022-2:

This comment provides information regarding the organization that authored **Letter No. 022**. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 022-3:

Newhall Ranch is a mere eight miles from the City of Los Angeles boundary, the Santa Clarita Valley is an economic engine in its own right. The area is home to 90,000 jobs - with 3,000 jobs created just in 2015 - in diverse sectors including biotech, technology, entertainment, healthcare and aerospace. Having more than 30 million square feet of job-generating space, it also falls within the entertainment studios' Thirty-Mile Zone, fostering film and television production in the area with 17 sound stages in Valencia alone.

Response No. 022-3:

The comment provides information regarding the employment opportunities that currently exist in the Santa Clarita Valley. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 022-4:

FivePoint's Newhall Ranch development will create 11.5 million square feet of job generating uses at buildout and generate thousands of permanent jobs, as well as temporary construction jobs, helping the Santa Clarita Valley continue to thrive economically and allowing families to live close to their work. The lack of housing in the Los Angeles region is well known. There is no question a substantial increase in the amount of quality housing is vitally important to the future of Los Angeles and the quality of life of its people. The Net Zero Newhall project will clearly assist in addressing the need for more housing.

Building a master-planned community of this size and fostering economic growth - without increasing greenhouse gas emissions - represents a model for sustainable master-planned communities and a true legacy project for California and beyond. Net Zero Newhall will continue to expand business attraction and employers to the region significantly adding to the regional economy.

NAIOP SoCal supports this job creating development that will also ease the housing crisis by adding much needed supply to help meet the demand.

Response No. 022-4:

The comment expresses support for the project as well as specific support for the employment generation, housing, and the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

023. Letter from Plug in America, dated February 10, 2017

Comment No. 023-1:

On behalf of Plug In America, I am writing in support of the following mitigation measures which are included in the Draft Additional Environmental Analysis:

Mitigation Measure 2-4: Residential Electric Vehicle Chargers and Vehicle Subsidy

Mitigation Measure 2-5: Commercial Development Area Electric Vehicle Chargers

Mitigation Measure 2-12: Off-Site Electric Vehicle Chargers

These measures are consistent with Plug In America's recommendations to the general public with respect to electric vehicle charging infrastructure.

Plug In America is also in support of the plug-in electric vehicle (PEV) component of the Net Zero Newhall Initiative. A major component of Net Zero Newhall is its commitment to PEVs and the infrastructure to support their widespread adoption and use. As publicly announced, this will include:

- An electric vehicle charging station in every home;
- 2,000 electric vehicle charging stations in Newhall Ranch commercial and community areas;
- 2,000 additional offsite charging stations in strategic L.A. County locations;
- Subsidies for converting public transit buses to electric buses; and
- An electric school bus program within Newhall Ranch.

We are pleased that FivePoint has also engaged our expert advisement regarding appropriate electric vehicle infrastructure for the Newhall project, including best practices for implementing home, workplace and public charging. Installing charging infrastructure on the scale Newhall proposes would no doubt benefit PEV drivers while also driving PEV adoption community-wide. If implemented as proposed by Plug In America, this initiative would represent a deep and broad commitment to support electric vehicle use at Newhall Ranch and around Los Angeles County.

Plug In America is the leading American voice promoting the use of plug-in electric vehicles. We are a coalition of PEV drivers led by leading experts in transportation electrification. Plug In America represents the world's deepest pool of experience of actually driving and living with PEVs. We help consumers, policy-makers, auto manufacturers and others to understand the powerful benefits of driving electric. We provide practical, objective information to help consumers select the best plug-in vehicle for their lifestyles and needs. Increased use of electric vehicles is one of the best methods of reducing criteria pollutant and greenhouse gas emissions, a major driver of climate change. Our work is consonant with the stated goals and strategies of the State of California.

For all of these reasons, we applaud this effort as an important step in accelerating the state's shift to vehicles powered by clean, domestic electricity. FivePoint has publicly committed to make this the most EV-friendly development in California history - and a model for future projects. As the national consumer voice for electric vehicles, we are excited to work with them to make that a reality. Plug In America enthusiastically supports FivePoint's plans to integrate electric vehicle infrastructure into their proposed project.

Thank you for your consideration of our comments. We hope they will contribute to the Department of Fish and Wildlife taking favorable action on the proposed project.

Response No. 023-1:

The comment provides information regarding the organization that authored **Letter No. 023**. The comment also expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is

located within the RMDP/SCP project area. The comment also expresses specific support for the incorporation of Mitigation Measure 2-4, Mitigation Measure 2-5, and Mitigation Measure 2-12 which are programs of the Net Zero Newhall proposal to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

024. Letter from Public Land Alliance Network, dated February 13, 2017

Comment No. 024-1:

Public Land Alliance Network (PLAN) is protesting the developments, Mission Village and Landmark Village, for numerous reasons:

Response No. 024-1:

The comment, which is an introduction to comments that follow, expresses opposition to the Mission Village and Landmark Village projects. While the comment does not specifically refer to the project, for purposes of these responses, CDFW conservatively will assume that the comments are intended to apply to the AEA prepared for the project. As this comment does not raise an environmental issue regarding the AEA, no further response is required.

It is also noted that CDFW is not the CEQA lead agency for the Mission Village and Landmark Village projects, and will not be issuing the discretionary approvals and entitlements required for those tract maps; rather, the lead agency and agency with land use jurisdiction is the County of Los Angeles. However, CDFW is the CEQA lead agency for the RMDP/SCP project, the approval of which would facilitate development of the two referenced villages.

Comment No. 024-2:

Mission Village will be built over a closed oil field. This is a dangerous situation with the airborne VOCs that will leak into the homes as historically been the case throughout former closed oil field sites. The Porter Ranch massive gas leak, the worst in USA history, is an example of the deleterious results of building on former oil fields.

Response No. 024-2:

The comment expresses concern with respect to the location of the Mission Village project site on a closed oil field. Please see **Response to Comment No. IE15-1** for relevant information that is responsive to this comment. As explained in the **Response to Comment No. IE15-1**, this issue is beyond the scope of the AEA. (See **Topical Response 1: Scope of Additional Environmental Analysis.**) Additionally, both the 2010 Final EIR for the project and the County of Los Angeles's Final EIR for the Mission Village project contain substantial evidence showing that hazard impacts associated with the location of the Mission Village project site would be mitigated to less-than-significant levels. This comment offers no significant new information requiring additional analysis with respect to oil field and airborne VOC issues.

The comment also references the Porter Ranch gas leak (also called the Aliso Canyon gas leak) as an example of hazards resulting from building on former oil fields. However, as set forth in Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the Project's 2010 Final EIR, extensive regulatory mechanisms are in place to ensure safe urban development of oil and gas field properties, and to ensure that construction does not take place over improperly abandoned wells or other infrastructure. In addition, the application of the identified mitigation measures would ensure that any potentially significant hazards impacts would remain less than significant. The Aliso Canyon gas leak has resulted in legislative and regulatory responses that will further ensure the safety of gas storage facilities and protect against uncontrolled gas leaks. For example, in response to the Aliso Canyon leak, SB 887 was signed into law on September 26, 2016. The bill acknowledges the importance of public transparency of the risks and regulations involved in gas storage, and calls for numerous safety measures at the Aliso Canyon site. In conjunction with SB 887, SB 888 was signed, establishing the Office of Emergency Services (OES) as the lead agency to handle future emergency responses.

Comment No. 024-3:

Santa Clarita's explosive population growth in the last two decades has made it the third largest city in LA County. Loss of open space, unchecked developments, has created a Hwy 5 - Hwy 14 commuter traffic clog

with unbearable extended travel times. To ignore this traffic congestion choke-hold in supporting the Mission Village and Landmark Village with 21,000 planned units, is irresponsible planning. These traffic conditions are not just statistics; for those subjected to this daily work commute, it compounds an already intolerable situation. The exclusion of addressing the traffic analysis is unacceptable.

Response No. 024-3:

The comment states that the AEA should have addressed the traffic impacts of the project. However, the issue raised by the comment is outside the scope of the AEA. (See **Topical Response 1: Scope of Additional Environmental Analysis.**). As such, no further response is required. Additionally, as discussed in **Topical Response 4: Traffic Impact Analysis**, no additional traffic would be generated by any aspect of the project's modifications evaluated in the AEA. Further, the traffic analysis presented in the 2010 Final EIR accounted for future increases in traffic volumes on study area roadways. Since completion of that EIR, there have been no substantial changes requiring major revisions to the subject traffic analysis. This comment offers no significant new information requiring additional analysis with respect to traffic issues.

Comment No. 024-4:

Santa Clarita is a high-desert eco-system with spiked summer heat-winds, certain increased GHG caused by excessive growth, coupled with the loss of open space in a river flood-plain, and cluster-housing contamination issues alongside the Santa Clara River is not smart growth.

Response No. 024-4:

The comment describes certain aspects of Santa Clarita, but does not raise an environmental issue regarding the AEA. As such, no further response is required. That being said, it will be noted that, as described in the AEA, the project will result in net zero GHG emissions, following implementation of Mitigation Measures 2-1 through 2-13. As such, the project will not contribute to the increase the 2010 Final EIR, the development facilitated by approval of the project is intended to accommodate approved and planned growth in the region that creates a demand for housing and employment.

Comment No. 024-5:

This development, as proposed, will have negative impact on the Santa Clara River as it flows through the Ventura County to the Pacific Ocean, wildlife, plant-habitat in the regional wildlife movement between the Santa Susana Mountains and the Los Padres National Forest in the Rim of the Valley wildlife corridor. The two developments need to be reconfigured: Moved back away from the river floodplain, to not have the filling of 200 million cubic yards of dirt, scaled back in size, so as not to be a detriment to the health of humans.

Response No. 024-5:

The comment states that both the Mission Village and Landmark Village projects need to be moved away from the floodplain of the Santa Clara River and reduced in size. The issues raised by the comment are outside the scope of the AEA. (See **Topical Response 1: Scope of the Additional Environmental Analysis.**). As such, no further response is required; however, it will be noted that the 2010 Final EIR contained a comprehensive alternatives assessment, as well as an assessment of floodplain-related impacts. Neither assessment was found to be inadequate by the courts, and this comment offers no significant new information requiring additional analysis with respect to these issues. Please also see **Response to Comment Nos. IE15-14 through IE15-16** for additional discussion of these issues.

Comment No. 024-6:

Endangered Status: Spineflower, threespine stickleback fish, steelhead trout, least Bell's vireo, western yellow-billed cuckoo and the southwestern willow flycatcher are all California State and/or Federal Endangered status. The diminished riparian habitat for the southwestern willow flycatcher is significant because of their role in controlling insect populations. The Santa Clara River is one of five breeding grounds for the western yellow-billed cuckoo. Mitigation cannot save these Endangered species, this is a choke-point were one more loss of habitat can end this species' existence.

Response No. 024-6:

The comment lists six wildlife species that are listed as threatened or endangered under the ESA or CESA. The comment does not address any of these species other than southwestern willow fly catcher and the western yellow-billed cuckoo. As to the first, the comment states that diminished riparian habitat for the southwestern willow flycatcher “is significant because of their role in controlling insect populations.” As to the second, the comment states that the “Santa Clara River is one of five breeding grounds for the western yellow-billed cuckoo.” The comment expresses the opinion that “[m]itigation cannot save these [e]ndangered species, this is a choke-point where one more loss of habitat can end the species’ existence.”

The comment makes statements and addresses issues beyond the scope of the Draft AEA. (See **Topical Response 1: Scope of the Additional Environmental Analysis.**) In addition, the 2010 Final EIR analyzed project-related impacts on southwestern willow flycatcher and western yellow-billed cuckoo. (See 2010 Final EIR, Section 4.5.5.3, pp. 4.5-797–4.5-818 and pp. 4.5-819–4.5-838.) Those analyses were not challenged in *Center for Biological Diversity v. California Department of Fish and Wildlife*. As a result, they cannot be challenged now. No further response is required.

Comment No. 024-7:

Thank you for reviewing these comments and consideration in readdressing these serious concerns for a challenged riparian eco-system that supports the well-being of humans, wildlife, native plants in Santa Clarita/Los Angeles County and throughout Southern California.

Response No. 024-7:

The comment expresses appreciation for CDFW’s consideration of the issues presented in the comment letter. The comment is acknowledged, and will be included as part of the record and is included in this Final AEA for review and consideration by the decision-makers.

025. Letter from Lynne Plambeck, SCOPE, dated February 12, 2017, email dated February 13, 2017

Comment No. 025-1:

Comment letter and 3 attachments.

Response No. 025-1:

The comments set forth in the attached letter are addressed below (see **Comment Nos. 025-2** through **025-32** and their corresponding responses). This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 025-2:

Santa Clarita Organization for Planning and the Environment (SCOPE) is a 30 year old local watershed group that focuses on planning and conservation issues in the Santa Clarita Valley. We have participated in the various permitting processes for this project since its inception and are very familiar with the project itself and the impacts it will have on our valley.

We join with other groups and individuals in stating these concerns, and incorporate by reference the comments made by other conservation groups, agencies and individuals that have submitted comments expressing concerns in these areas.

Response No. 025-2:

This comment is an introduction to comments that follow. No further response is required.

Comment No. 025-3:

We begin by asking why the Agency chose to not post or at least reference a link to the previous EIR document, completed seven years ago in 2010, on the website where these documents are stored. While we did find a link buried in the EIR, not having a link on the document site, makes it difficult for the public to find, review and compare what was said in the previous document to the new document, or review the current document for missing data that was available in the previous document. We ask that your agency post such a link prior to the final response to comments.

Response No. 025-3:

This comment raises questions about whether CDFW posted or referenced a link to the 2010 Final EIR for the project. The comment does not identify a deficiency with the notice or information presented in the Draft AEA.

The website where the Draft AEA was available for public review included links to the project's April 2009 Draft EIR and 2010 Final EIR, as well as the Draft AEA itself and both the original and revised NOAs for the AEA. The public notice for the Draft AEA identifies the website where the Final EIR could be accessed. CDFW complied with all requirements CEQA pertaining to NOA of documents related to the project.

Comment No. 025-4:

Process

We assert that it was improper to submit an Additional Document for review with only two chapters included. The reason for this is that one cannot determine the extent or accuracy of the greenhouse gas production that will be created by this project, and thus adequately develop mitigation measures without including chapters on traffic, air quality, water supply, solid waste, water service and utilities.

Response No. 025-4:

This comment questions the scope of the Draft AEA. Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains how the scope of this environmental analysis is pursuant to and consistent with the 2015 decision issued by the California Supreme Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife* litigation. As discussed at length in that response, the Supreme Court's decision only found fault with the portion of the environmental analysis that addresses the significance of the project's GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords with the California Supreme Court's decision.

Further, each of the environmental topics listed in the comment (i.e., traffic, air quality, water supply, solid waste, water service, and utilities) were previously studied and evaluated by CDFW in the 2010 Final EIR. Challenges against these analyses either were litigated and found by the courts to comply with CEQA, or could have been (but were not) litigated within the timeframe allowed under CEQA. The comment does not identify any flaws or omissions with the prior analyses of these topics.

Finally, the AEA analyzed the GHG emissions from all of the project's emissions sources and found, with the implementation of the recommended GHG mitigation measures, that the project would achieve net zero GHG emissions. The comment does not identify any particular flaws or omissions in the GHG analysis provided in the Draft AEA.

Therefore, no additional analysis was required and no further response is required.

Comment No. 025-5:

Controlling greenhouse gases and traffic congestion are intimately related. Traffic congestion in the Santa Clarita area, particularly on the I-5 and 14 freeways has increased substantially since this project was reviewed in the 2010-2011 time period. The HOV lanes are not reducing traffic at peak hours, leaving motorist idling their engines even in those lanes for substantial amounts of time. The considerable traffic generated by new commuters from this project will add to the standstill and generate additional pollution by its impact on slowing other drivers as well as the pollution it will create from the project's own predicted 357,000 trips per day at build out.

Residents are not remaining in the Valley to work as predicted by Newhall Land's numerous EIRs on the many projects in the Santa Clarita Valley, as well as the previous iteration of this document. (We hereby include by reference and refer to the previous document for this project which is available and held at the Agency's offices.) According to this document, traffic modeling is still based on the Santa Clarita Valley Consolidated Traffic Model 2004 Update and Validation (March 2005)¹. This document is now twelve years old, and observably inaccurate. A new evaluation of traffic generation on current traffic patterns is required to rectify what was obviously an underestimate of the length of commutes in the previous document. A chapter updating the traffic analysis must be added.

Response No. 025-5:

The comment raises several comments about traffic congestion and the traffic model, which are beyond the scope of the AEA. Traffic and the traffic model were issues raised in comments on the 2010 Final EIR, but not found to be deficient by the courts. The comment does not provide any evidence that the project modifications described in the Draft AEA would result in increased traffic congestion. The comment also does not provide any evidence that traffic congestion would be different than what was analyzed in the Draft AEA (and the underlying proceedings). Based on **Topical Response 4: Traffic Impact Analysis**, the traffic analysis from the 2010 Final EIR remains valid and does not require additional analysis or updating in the AEA. In addition, please refer to **Topical Response 1: Scope of the Additional Environmental Analysis** for additional responsive information as to the scope of the AEA. Although this comment is beyond the scope of

the AEA and no response is necessary, for information purposes, the following is provided in response to this comment.

The project's GHG emissions were estimated using CalEEMod®, the industry standard modeling platform for CEQA analysis. For purposes of the project's mobile source-related emissions estimates, CalEEMod® is informed by the EPA's AP-42 emission factors and ARB's on-road and off-road equipment emission models, such as EMFAC and OFFROAD. Notably, the model is designed to estimate operational, on-road mobile vehicle traffic generated by a project's land uses. For purposes of the AEA's GHG emissions analysis, traffic information for each project land use was provided by Stantec, a transportation engineering firm. (See Draft AEA, p. 2-18 and Draft AEA Appendix 1, Section 2.3.5, Mobile Sources.) CalEEMod® estimates the GHG emissions resulting from project-related VMT accrued by the proposed land uses. Using those inputs, CalEEMod® specifically accounts for CO₂ emissions from running, start-up, and idling vehicles.

Comment No. 025-6:

An air quality chapter should be added to ensure that methane generation and CO₂ precursors from the added uses of these new residents is properly accounted for in the GHG inventory.

Response No. 025-6:

The comment states that additional air quality analysis is needed to properly account for the GHG emissions inventory in the AEA, but the comment does not provide any evidence to support this statement. Air quality issues were raised in comments on the 2010 Final EIR, but were not found to be deficient by the courts. Therefore, the air quality analysis from the 2010 Final EIR remains valid and does not require additional analysis or updating in the AEA. (See **Topical Response 1: Scope of Additional Environmental Analysis** for additional responsive information.) Although this comment is beyond the scope of the AEA and no response is necessary, for information purposes, the following is provided in response to this comment.

The operational GHG emissions inventory presented in the AEA includes emissions of CO₂, CH₄, and N₂O associated with area sources, energy, water and wastewater, traffic, and solid waste. The project's GHG emissions were estimated using CalEEMod®, the industry standard modeling platform for CEQA analysis. CalEEMod® follows IPCC guidelines and provides a platform to calculate both construction emissions and operational emissions from a land use development project. This model was developed under the auspices of SCAQMD, which is the air district with jurisdictional boundaries covering the project site, and received input from other California air districts, and is currently used by numerous lead agencies when quantifying the emissions associated with development projects undergoing environmental review. CalEEMod® uses widely-accepted models for emission estimates combined with appropriate default data that can be used if site-specific information is not available. Please see **Response to Comment No. 09-11** for additional information regarding why the use of CalEEMod® to develop the emissions estimates that inform the Draft AEA's significance conclusions fully accords to CEQA Guidelines Section 15064.4(a)(1).

As described in the documentation prepared to support the application of CalEEMod®:

The greenhouse gas (GHG) pollutants are those recognized by the state of California under Assembly Bill 32 (AB32). The most common GHGs emitted in association with land use developments include carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). All GHGs would be reported on a common currency of carbon dioxide equivalent (CO₂e). In order to obtain the CO₂e, an individual GHG is multiplied by its global warming potential (GWP).

Therefore, the appropriate GHG pollutants (i.e., CO₂, CH₄, and N₂O) that are generated by the project are accounted for in the AEA's GHG emissions estimates.

At this time, neither the State of California nor SCAQMD nor other local jurisdictions have established a methodology or protocol to incorporate what may be considered "GHG precursors."

Comment No. O25-7:

Water supply and utility chapters should be included due to the creation of greenhouse gases involved with moving water, treating sewage, (including treating to remove salts where a new 2015 proposal will require trucking of wastes to an ocean outfall pipe line for the first 6000 units². Not only will this generate additional greenhouse gases from truck that must be included in the GHG inventory, but also, changing to this up gradient location will require pumping stations that run on electricity or another fossil fuel generated source to move the considerable amount of sewage uphill for treatment instead of the gravity fee plan initially envisioned.

If it is not derived from a clean source, production of electricity generates green house gases. Natural gas used for heating and cooking in all these future homes, will generate greenhouse gas. However, we cannot know how much or if the impacts were properly calculated because a utility chapter is not even included in the document.

² *This is a changed circumstance. Previous EIRs relied on the Newhall Ranch Sanitation Plant. However, after the previous iteration of this EIR was completed, it came to light that Newhall Ranch will use the existing Sanitation Plant for sewage treatment of its first 6000 units. As noted above this will change energy requirements and add truck traffic. We include by reference, the FEIR for this project, which can be viewed at this link:
http://www.lacsd.org/wastewater/chloridefacplaneir/final_santa_clarita_valley_sanitation_district_chloride_compliance_facilities_plan_and_eir.asp*

Response No. O25-7:

The comment raises questions about water supply and utility analyses. Such issues were raised in comments on the 2010 Final EIR and not found to be deficient by the courts. The comment does not provide any evidence of a change in the water supply or utility framework that is related to the proposed modifications described in the Draft AEA. The modified bridge design measures and proposed Mitigation Measures 2-1 through 2-14, as described in the Draft AEA, would not result in any changes to the water supply or utility framework relative to the analysis presented in the 2010 Final EIR. The water supply and utility analysis from the 2010 Final EIR remains valid and does not require additional analysis or updating in the AEA. (See **Topical Response 1: Scope of the Additional Environmental Analysis** for additional responsive information.) See **Response to Comment No. O25-6** above for additional information pertaining to the use of CalEEMod®.

With regard to utility emissions, the comment is incorrect in stating that the AEA does not show the GHG emissions due to natural gas and electricity for the future homes. GHG emissions due to electricity production and natural gas combustion are presented in Draft AEA Table 2-1 (see rows “Electricity” and “Natural Gas,” respectively). The methodology to calculate these emissions is described generally in the Draft AEA on pages 2-17 and 2-18; additional detail is provided in Draft AEA Appendix 1, Section 2.3.2.

For wastewater-related emissions, CalEEMod® relies upon electricity intensity factors for water use that include the electricity required to “supply, distribute, and treat the water and wastewater,” and also includes the CO₂ and CH₄ emissions from wastewater treatment. For purposes of the project’s GHG emissions analysis, the emissions associated with the conveyance of wastewater as calculated by CalEEMod® are assumed to reasonably capture the potential interim condition referenced in the comment whereby wastewater may require wastewater haul trips. In addition, at the Newhall Ranch village-level, both the Landmark Village Final EIR (Sept. 2011; SCH No. 2004021002) and the Mission Village Draft EIR (May 2011; SCH No. 2005051143) evaluated the interim (or temporary) treatment of wastewater for up to 6,000 Newhall Ranch dwelling units at the existing Valencia WRP until such time as the Newhall Ranch WRP is constructed and operational – all of which was part of a 2002 Interconnection Agreement with the Santa Clarita Valley Sanitation District. (See the Landmark Village Final EIR, pages TR-12-6 through TR-12-45 and the Mission Village Draft EIR, pages 1.0-69 through 1.0-70a.) Further, at the Newhall Ranch village-level, the GHG emissions associated with any hauling of brine effluent to and from the Valencia WRP are accounted for in the additional environmental documentation prepared for Landmark Village and Mission Village.

Conservatively, GHG emissions from wastewater treatment also were added to the project's inventory, beyond that calculated pursuant to CalEEMod® defaults, based on the permitted capacity of the Newhall Ranch WRP. That WRP's permitted capacity is based on the maximum daily capacity of the WRP, which is designed to account for daily fluctuations in wastewater treatment requirements. This calculation is further described in the Draft AEA Appendix 1, Section 2.3.3.

The direct and indirect emissions associated with the Newhall Ranch WRP's wastewater treatment processes are captured through the wastewater emissions estimates for each of the project land uses that would send wastewater to the WRP. However, because the WRP is designed with the capacity to treat 6.8 million gallons per day of wastewater, Table 2-15e in the Draft AEA, Appendix 1, shows the calculation used to represent the direct and indirect emissions associated with the additional wastewater not already accounted for in Table 2-15b for the Newhall Ranch WRP treating wastewater up to its maximum designed capacity.

In summary, the AEA's analysis is informed by a substantiated and reasonable methodology, and incorporates emissions due to utility consumption and water and wastewater supply, treatment, and distribution.

Comment No. 025-8:

Year	LandGEM ¹ (standard cubic feet per minute)	Adjusted LandGEM ² (standard cubic feet per minute)	Actual Flow (standard cubic feet per minute) ³	Collection Efficiency (%)
2001 – 2002 ⁴	2,913	2,870	2,748	96
2002 – 2003 ⁴	3,216	3,169	3,348	106
2006 ⁴	4,133	4,071	3,955	97
2007 ⁴	4,423	4,358	3,851	88
2008 ⁴	4,710	4,640	3,631	78
2009 ⁵	4,981	4,907	3,769	77
2010 ⁴	5,049	4,974	3,784	76
2011 ⁶	5,212	5,135	3,968	77
2012 ⁶	5,431	5,351	4,161	78
2013 ⁶	5,548	5,466	4,098	75
2014 ⁶	5,688	5,603	3,983	71

Solid waste generated from this project would be placed in a landfill, that, if it is complying with the law would still have 15percent fugitive methane (now a regulated GHG) releases. If it is not, it may have even greater releases such as Chiquita Canyon has now. The methane releases from garbage generated by the future residents of this project were not calculated and cannot be estimated since there is no solid waste chapter included in the document.

Response No. 025-8:

The comment states that the “methane releases from garbage generated by the future residents of this project were not calculated.” This comment is not correct, as the GHG emissions analysis presented in the Draft AEA calculated the “[i]ndirect GHG emissions associated with solid waste generated by the proposed land uses ... using the applicable module in CalEEMod® and solid waste generation rate[s] based on the City of Santa Clarita 2012 actual disposal rates.” (See Draft AEA, page 2-20; see also Draft AEA Appendix 1, Section 2.3.4.) As shown in Draft AEA Table 2-1, prior to implementation of the recommended mitigation framework, the project's solid waste generation-related activities would emit 23,179 MT CO₂e per year.

The results of the solid waste-related GHG emissions analysis reported in the Draft AEA were calculated using CalEEMod®. As discussed in prior responses, CalEEMod® provides a platform to calculate both construction emissions and operational emissions from a land use development project, and estimates the indirect GHG emissions associated with waste that is disposed of at a landfill. As described in Appendix A, calculation Details for CalEEMod®, of the CalEEMod® User's Guide:

The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses. If waste disposal information was not available, waste generation data was used. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. The program quantifies the GHG emissions associated with the decomposition of the waste which generates methane based on the total amount of degradable organic carbon.⁵³ The program would also quantify the CO₂ emissions associated with the combustion of methane, if applicable. Default landfill gas concentrations were used as reported in Section 2.4 of AP-42. The IPCC has a similar method to calculate GHG emissions from MSW in its 2006 Guidelines for National Greenhouse Gas Inventories.⁵³

Landfill gas generation is dependent upon the amount, type, age and moisture content of the disposed waste. The United States Environmental Protection Agency (USEPA) has developed emission factors for landfill gas as specified in Section 2.4 of AP-42 which are incorporated in the LANDGEM model. This model uses a first order decay equation that would vary with time. However, there is no need to use a time-varying emissions model, as we are interested in total emissions of gases that could be emitted from a ton of waste. Therefore, instead of using the LANDGEM model, the volume of landfill gas from solid waste would be based on the total amount of degradable organic carbon (CAPCOA 2013).

In lieu of using the default data provided by CalEEMod®, the project's GHG emissions analysis for solid waste was informed by region-specific inputs, and specifically data points collected by the California Department of Resources Recycling and Recovery (CalRecycle) pertaining to the City of Santa Clarita. (See Draft AEA Appendix 1, p. 14.) Because the project site is immediately adjacent to the City of Santa Clarita, and because the development facilitated by the project is expected to have a similar waste generation stream profile as the City (based on the proposed mix of uses), the City's actual disposal rate was determined to be a reliable input for the analysis. For purposes of estimating project-related emissions in 2030, the City's actual disposal rate was adjusted to reflect the anticipated attainment of the state's policy goal (as codified via AB 341) to recycle, compost, or source reduce 75 percent of solid waste by 2020.

As explained in the project's GHG Emissions Technical Report (i.e., Draft AEA Appendix 1), the GHG emissions accounted for by CalEEMod® include the GHG emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon. As such, the "Solid Waste Generation" inventory data presented in the pertinent tables of the Draft AEA (i.e., Tables 2-1, 2.3-3, and 2.3-5) account for the GHG emissions from the project-related solid waste that would be generated by future residents and workers; and, thus, the comment's conclusion is incorrect.

Comment No. 025-9:

Newhall's Claim of No Increase to GHG from their project.

Newhall claims that they will reduce greenhouse gases to net zero through mitigation and offsets. We believe this claim is patently absurd. While mitigation such as charging stations in homes, etc., are needed improvements, they will not verifiably reduce GHG generation to net zero for this huge project where no transportation other than autos and buses is available.

Response No. 025-9:

The comment raises questions about the project's achievement of net zero GHG emissions; however, the GHG emissions analysis completed by Ramboll Environ includes detailed technical analysis and modeling that was subject to independent review and evaluation by two other technical experts at the request of CDFW: Ascent Environmental, Inc. and ARB. As memorialized in a letter from CARB to CDFW, dated November 3, 2016 (a copy of which is included in Final AEA Appendix 1):

ARB staff consulted with Department of Fish and Wildlife staff and technical experts at Ascent Environmental, the principal consultant assisting the Department. In doing so, ARB staff reviewed

the technical documentation provided for the evaluation of the project's total estimated GHG emissions and the reductions in emissions to be achieved through the mitigation measures. Based on staff's review, ARB finds the documentation provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.

CARB's finding that the project's GHG emission reduction calculations are documented by "an adequate technical basis" is part of the body of substantial evidence that supports the Draft AEA's GHG emissions analysis, particularly as CARB is the state agency designated with the responsibility for and expertise to implement statewide policy on global climate change and the reduction of GHG emissions.

The comment raises concerns regarding the off-site GHG reductions associated with the project. Please see **Response to Comment No. 09-32** for a detailed discussion of the implementation and enforcement of the off-site GHG reductions. **Response to Comment No. 09-32** provides a broad overview of the performance standards underpinning the GHG Reduction Plan that instruct all GHG reductions used for compliance with Mitigation Measures 2-10 and 2-13 are consistent with CEQA Guidelines Sections 15126.4(c)(3) and (c)(4) (allowing GHG mitigation by "[o]ff-site measures, including offsets that are not otherwise required" and "[m]easures that sequester greenhouse gases"). The use of offsets as CEQA mitigation for GHG emissions is appropriate and well established.

As required by Mitigation Measure 2-13, the project applicant would primarily achieve GHG reductions through the implementation or funding of Direct Reduction Activities or, if necessary, by purchasing carbon offsets. Section VI of the GHG Reduction Plan identifies the three compliance options permitted by Mitigation Measure 2-13 (GHG emissions associated with a 30-year project life). Former Compliance Option No. 2 has been eliminated, which removes the option for the Applicant to provide a guarantee of compliance (see the revised GHG Reduction Plan in Final AEA Appendix 6, formerly presented as Appendix F of Draft AEA Appendix 1, for revised Mitigation Measure 2-13, with this option deleted).

Section VII of the GHG Reduction Plan identifies the two compliance options permitted by Mitigation Measure 2-10 (GHG emissions associated with project construction). Section VIII establishes the compliance confirmation process by the Approved Registry, with the Approved Registry providing retirement documentation in a form that can be provided by the project applicant to the County of Los Angeles to demonstrate compliance. The project applicant must also provide a written attestation from an Approved Registry to Los Angeles County where the attestation confirms that the retired GHG mitigation credits or carbon offsets satisfy the performance criteria established in Section IX of the GHG Reduction Plan. Mitigation Measures 2-10 and 2-13 are incorporated into the MMRP and enforced by Los Angeles County.

Mitigation Measures 2-10 and 2-13 expressly require the retirement of GHG mitigation credits and/or carbon offsets prior to issuance of a grading permit (for construction GHG emissions) or building permit (for 30-year project life GHG emissions), respectively. Retiring a GHG mitigation credit or carbon offset eliminates it from further use and avoids any double counting. A GHG mitigation credit or carbon offset cannot be retired until it is first issued by an Approved Registry in accordance with the Approved Registry's protocols for the activity in question, with the Approved Registry attestation noted above. Specifically, under Mitigation Measure 2-10, prior to obtaining a grading permit, the project applicant must satisfy its mitigation obligation for all construction-related GHG emissions associated with the grading permit, which includes all construction-related and vegetation change GHG emissions from the start of grading through vertical construction, before any grading begins. Similarly, under Mitigation Measure 2-13, the project applicant must satisfy its mitigation obligation associated with the building permit, which includes all GHG emissions for the 30-year project life for the portion of the project covered by the building permit, before building occupancy occurs. Thus, mitigation compliance is completed before the activity in question begins and is enforced by Los Angeles County.

Accordingly, the GHG emission reductions required by Mitigation Measure 2-13 would be realized in advance of the project's estimated operational emissions. Specifically, since the project is required to provide evidence of the GHG emission reductions for the full 30-year lifetime of the subject residence and

commercial square footage prior to the County of Los Angeles's issuance of the subject building permit, the GHG emission reductions would be provided well before the operational emissions occur. For Compliance Option No. 1, the GHG emission reductions would occur before the project's operational emissions because the Direct Reduction Activity's emission reductions would accrue at a faster rate due to the shorter life span of the Direct Reduction Activity than the estimated project emissions calculated using the 30-year project life

As stated above, all GHG mitigation credits and carbon offsets must meet the performance standards in Section IX of the GHG Reduction Plan, as revised (see Final AEA Appendix 6). Among other standards, this requires a Direct Reduction Activity to meet additionality requirements and to be fully implemented and confirmed by an accredited, independent third party in accordance with approved methodologies from an Approved Registry. The GHG Reduction Plan, through the implementation of direct reduction activities and the purchase of carbon offsets meets the requirements of CEQA, as discussed in this response and **Response to Comment Nos. 09-32 through 09-62.**

The comment also appears to reach its conclusion based on the assertion that the only transportation options available to the project are "autos and buses." However, the assertion is not factually supported. The project would provide multiple travel options to its residents, employees, and visitors that are described in the Newhall Ranch TDM Plan, a copy of which is located in Appendix E of the Draft AEA Appendix 1. The TDM Plan and supporting evaluation were prepared by two recognized transportation engineering firms, with demonstrated expertise in the evaluation of VMT reducing strategies: Fehr & Peers and UrbanTrans. Based on that collaborative analysis, the project includes, but is not limited to, a comprehensive travel network for pedestrians and bicyclists, transit service, subsidies to increase the use of transit and neighborhood electric vehicles (NEVs), a mandatory commute trip reduction program, a school bus program, bike share and car share program subsidies, and tech-enabled mobility strategies to increase participation rates in the TDM Plan's various programs.

The project's achievement of net zero GHG emissions does not rely upon a singular strategy, such as the mode-shift objective suggested in the comment. Rather, Mitigation Measures 2-1 through 2-13 rely on a portfolio of GHG emissions-reducing strategies that cover multiple aspects of the project's emissions inventory attributes. Notably, consistent with state policy, the project's transportation-related emissions are not exclusively reduced through mode-shift strategies (i.e., Mitigation Measure 2-6), but also through the electrification of the project's vehicle fleet (i.e., Mitigation Measures 2-4, 2-5 and 2-12).

Comment No. 025-10:

Based on current ridership in the Santa Clarita Valley, it is highly unlikely that residents of Newhall Ranch will avail themselves of bus transportation due to the inconvenience and travel time. We believe that Newhall must produce a study showing that buses would reduce auto use in this project.

Response No. 025-10:

The comment, without support, states that project residents are unlikely to use transit buses because of the "inconvenience and travel time." The comment requests that the project prepare a study showing that transit buses would be used.

In response, please see Appendix E to the Draft AEA Appendix 1. As discussed on pages 5 and 6 of the Fehr & Peers technical memorandum contained in Appendix E, the TDM Plan would reduce total project VMT by approximately 1.3 percent due to its extension of local transit service to the project site. This percent reduction in total VMT was calculated in accordance with published guidance from CAPCOA, "Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures" (CAPCOA 2010). More specifically, CAPCOA's published guidance (see pages 276-279) addresses the quantification of VMT reductions from Strategy TST-3: Expand Transit Network. As explained therein, Strategy TST-3 has a range of effectiveness of 0.1 to 8.2 percent reduction in total VMT. This range is based upon the observed increase in transit use as a result transit service expansion. The greatest changes in transit use were observed in suburban settings, where there is a greater opportunity to capture increased modeshare compared to urban locations which already have an

established transit system. The project-specific VMT reduction of 1.3 percent presented in Appendix E of the Draft AEA Appendix 1 was calculated based on this elasticity of transit use and the existing modeshare of 2.3 percent in nearby Santa Clarita. Existing Santa Clarita Valley Transportation Authority bus routes would be extended onto the project site and would connect the project site to major transit centers, such as the Santa Clarita or Newhall Metrolink Stations. Fehr & Peers's application of Strategy TST-3 relies on the existing 2.3 percent transit mode share reported by the City of Santa Clarita following the calculation method established in CAPCOA. As such, the analysis reasonably reflects existing transportation trends in the project's immediate vicinity. The comment has provided no evidence that those existing transportation trends are inaccurate or would change adversely in the future. In addition to the expansion of the transit network to the project site, it should be noted that the project's TDM Plan would further incentive the use of transit buses by providing transit fare subsidies to employees and below market rate housing residents, and by providing additional options that make transit travel more appealing, reliable, and seamless, including car-share, the development of mobility hubs, and the inclusion of pedestrian-friendly development throughout the project. Thus, contrary to the comment's claims, there is substantial evidence based on studies as highlighted in Appendix E to the Draft AEA Appendix 1.

Comment No. 025-11:

For instance, there is no guarantee that homeowners will use electric vehicles, nor could homeowners be forced to purchase them. While a small subsidy is certainly a carrot towards this outcome, it is unlikely that a \$1000 subsidy, a small percentage of the total cost of any new electric vehicle, (for 50percent of the homeowners) is something of which new owners would be financially able to avail themselves.

Response No. 025-11:

After recognizing that the \$1,000 purchase subsidy for ZEVs required by Mitigation Measure 2-4 is a "carrot" that would facilitate the penetration of ZEVs into the vehicle fleet, the comment states that few homeowners are likely to use the purchase subsidy and drive ZEVs. However, the Draft AEA provides an extensive evaluation and analysis of this subject in Draft AEA Appendix 1 and Appendix H thereto. Notably, Appendix H presents the results of an economic forecast model that evaluates the effects of the Project's mitigation commitments on the purchase of ZEVs by the community's residents. The forecast model is based on economic principals of demand and relies upon numerous published studies on EV purchasing behavior. The information highlighted here is discussed further in **Topical Response 3: Zero Emission Vehicles at Newhall Ranch**. Please also see **Response to Comment Nos. 09-25 and 09-26** for discussion of the evidentiary basis for the AEA's analysis of the GHG emissions reductions related to Mitigation Measure 2-4 and the penetration of ZEVs into the vehicle fleet. The comment offers no substantiated evidence that refutes the validity of the analysis completed in the AEA.

In addition, to further address the concern raised in the comment about the ZEV subsidies in Mitigation Measure 2-4, use of the ZEV purchase subsidy (which complements existing state rebate funding and federal tax credits for ZEV purchases) required by Mitigation Measure 2-4 would be monitored and un-used ZEV incentive dollars, if any, would be used elsewhere to achieve an equivalent level of GHG emission reductions to that identified in the Draft AEA. As described in the project's MMRP (a copy of which is included in Final AEA Appendix 2), in the event that the ZEV subsidies are not fully used after occupancy of the final residential dwelling unit, the Applicant or its designee, which may include the Transportation Management Organization (TMO) or its equivalent entity, is required to coordinate with the Los Angeles County Planning Director and secure the Planning Director's approval of one or more strategies that secure an equal amount of GHG emission reductions.

Notably, the equivalency value (i.e., 5.06 MT CO₂e reductions per year per un-used subsidy) is conservative because it singularly links Mitigation Measure 2-4's emissions reduction to the use of the ZEV purchase subsidy. However, as described in the AEA, the causal factors that contribute to the uptake of ZEVs in project households include the vehicle purchase subsidy and the on-site residential charging infrastructure and the on-site and off-site non-residential charging infrastructure.

Comment No. 025-12:

This is not a verifiable reduction. Also, charging stations are proposed for only one space, so how will that bring GHG levels back to the required 1990 level when half or more residents will admittedly not be driving EVs, if even that many.

Response No. 025-12:

The comment generally asserts that Mitigation Measure 2-4's GHG emission reductions are not "verifiable." However, implementation of Mitigation Measure 2-4 would be monitored and tracked through the CEQA-mandated MMRP, a copy of which is included in Final AEA Appendix 2. The MMRP provides mechanisms for the County of Los Angeles to track the use of Mitigation Measure 2-4's ZEV purchase subsidies (see **Response to Comment No. 025-11** above for related information), as well as the installation of ZEV charging equipment for each residence.

The comment also is critical of Mitigation Measure 2-4's provision of charging equipment for one ZEV per residence, suggesting that charging equipment for more than one ZEV per residence is needed in order for the State of California to achieve the reduction mandate of AB 32 (i.e., statewide GHG emissions to return to the 1990 level by 2020). The comment appears to incorrectly establish the project's relationship to AB 32 through the singular parameter of its residential ZEV commitment in Mitigation Measure 2-4. However, as explained in the AEA, it is the combined effectiveness of the project's suite of GHG emissions-related mitigation measures, which reduce the project's emissions to net zero, that serve to establish the project's consistency with AB 32 and other state climate policy. Indeed, ARB's January 20, 2017 draft of the 2017 Climate Change Scoping Plan Update specifically recognized this project for its "commitment to achieve net-zero GHG emissions for a very large-scale residential and commercial specific planned development in Santa Clarita Valley."

It also should be noted that the project would not impair the ability of project residents to own and/or operate more than one ZEV. Such a potentiality would be supported by the project's "beachhead" community status, which is attributable – in part – to its proposed deployment of extensive on-site and off-site EV charging equipment, as well as the multi-faceted implementation of regulations, programs and policies from state, regional and local agencies to facilitate turnover in California's light-duty and passenger vehicle fleet (see **Topical Response 3: Zero Emission Vehicles at Newhall Ranch**, as well as **Response to Comment Nos. 09-25** and **09-26** for detailed discussion regarding the GHG emissions reduction calculations for Mitigation Measure 2-4).

Comment No. 025-13:

Purchasing climate credits that will ostensibly buy solar stoves in Africa is also unverifiable and does nothing to improve our local GHG generation as required for California, far less improve our local air quality for ozone and Nox, GHG precursors for which our area currently does not meet federal standards. This is not an acceptable mitigation. While offsets that occur in the Los Angeles basin might be acceptable if they can be verified, (and while we concur it would help Africa to have solar stoves), the current proposal will not reduce local and statewide impacts and so is not acceptable.

Response No. 025-13:

The comment raises concern regarding the location of off-site GHG reductions associated with the project. Please see **Response to Comment Nos. 025-9** and **09-32** for a detailed discussion of the implementation and enforcement of the offsite GHG reductions. **Response to Comment No. 09-32** provides an overview of the GHG Reduction Plan performance standards that underpin all GHG emissions reductions used for compliance with Mitigation Measures 2-10 and 2-13, in order to result in consistency with CEQA Guidelines Section 15126.4(c)(3)-(4).

The comment also refers to local air quality, including ozone and NOx emissions. Issues related to air quality were raised in comments on the 2010 Final EIR and not found to be deficient by the courts. The proposed Mitigation Measures 2-1 through 2-14, as described in the Draft AEA would beneficially impact air quality as

compared to the analysis presented in the 2010 Final EIR. In fact, the GHG mitigation measures are expected to reduce vehicle trips and VMT, which would likely benefit local air quality. In addition, the EV charging stations and ZEV purchase subsidies (complemented by existing state rebate funding and federal tax credits for ZEV purchases) would electrify a substantial amount of project trips and VMT, which also benefits local air quality. The air quality analysis from the 2010 Final EIR remains valid and does not require additional analysis or updating in the AEA. Please also see **Topical Response 1: Scope of the Additional Environmental Analysis** for additional responsive information.

Further, the AEA includes extensive commitments to reduce GHG emissions locally. These include Mitigation Measures 2-1 through 2-9, 2-11, 2-12 and 2-14. All of these commitments are likely to provide co-benefits to local air quality, and accord with the preferred geographic hierarchy recommended by SCAQMD (see Draft AEA, p. 2-25). In addition, as required by Section X of the GHG Reduction Plan, the project applicant must implement the GHG Reduction Plan so that, in the aggregate and taking into account all on-site and off-site GHG reductions achieved by Mitigation Measures 2-1 through 2-13, along with the additional EV charging stations identified in this Final AEA, the RMDP/SCP project shall meet, at full buildout, the following Locational Performance Standards: no less than 68 percent of the GHG reductions would be achieved within California; no less than 80 percent of the GHG reductions would be achieved within the United States; and no more than 20 percent of the GHG reductions would be achieved outside of the United States. The Locational Performance Standards apply at the RMPD/SCP project level, not to an individual village-level project.

The comment questions the benefits of achieving GHG reductions through projects located outside of the United States, such as cook stove projects. It is important to note that climate change is a global issue that is impacted by GHG emissions globally. Thus, GHG reductions anywhere in the world provide benefit to addressing global climate change concerns. The comment incorrectly suggests that GHG reductions should and need to only occur within the Los Angeles Basin or the state.

Further, the GHG Reduction Plan provides the necessary performance standards to result in the implementation and enforcement of the off-site GHG reduction programs, including cook stove programs. A more detailed explanation is included in **Response to Comment Nos. 09-32, 09-53, and 09-60**.

Comment No. 025-14:

The environmental document fails to provide a complete inventory of GHG generation due to missing analysis sections as cited above. As noted above, traffic patterns are presently greater than what Newhall claimed they would be in previous documents, thus causing the generation of more GHG as vehicles idle in traffic. Newhall Ranch will make this far worse, but these impacts were not included.

We suggest that a real, verifiable and acceptable mitigation would be to reduce the size of the project as well as including the proposed mitigation in this document [sic] as a requirement of approval.

Response No. 025-14:

The comment asserts that the Draft AEA does not provide a complete inventory of GHG emissions. However, the comment does not provide any evidence of a deficiency in the analysis. The comment refers to traffic impacts. As described in **Response to Comment No. 025-5**, the issue of traffic and the traffic model were raised in comments on the 2010 Final EIR and not found to be deficient by the courts. The comment does not provide any evidence that the project modifications described in the AEA would result in increased traffic congestion. The traffic analysis from the 2010 Final EIR remains valid and does not require additional analysis or updating in the AEA. Please see **Topical Response 4: Traffic Impact Analysis** and **Topical Response 1: Scope of the Additional Environmental Analysis** for additional responsive information, as well as **Response to Comment No. 09-16**.

The comment also refers to the mitigation of GHG emissions but does not present any evidence of a deficiency with the mitigation. As detailed in the AEA and as discussed in the responses above, the project would result in net zero GHG emissions based on the implementation of Mitigation Measures 2-1 through 2-

13. The mitigation measures would be enforced by the County of Los Angeles through the implementation of the MMRP.

Comment No. 025-15:

Inaccurate baseline

When the Newhall Ranch Specific Plan was approved in 2003, the approved unit number was 21,308 (Table attached as Exhibit 1). The table 1.2.1 on page 1-6 includes only 19, 517 units and adds another 1725 for the Entrada projects which were not included in the Specific Plan. While, it is our understanding that some units were removed from the Landmark project in the last review, to our knowledge it was NOT the nearly 2000 units indicated by this table. Please explain this discrepancy.

Response No. 025-15:

This comment requests further explanation of the number of dwelling units, which are included in the total development facilitated by approval of the RMDP/SCP Project and associated permits. The Newhall Ranch Specific Plan was approved by the County of Los Angeles in May 2003. As noted in the comment, Table 2.3-1 of the Specific Plan showed the overall land use plan framework, including a projected base number of 20,885 residential dwelling units. (See Newhall Ranch Specific Plan, Table 2.3-1, at pp. 2-20.) In addition, Table 2.3-1 of the Specific Plan noted that up to 423 second units could be built on lots (with approval of a conditional use permit) within specified land use designations (Estates and Low) of the Specific Plan, for a maximum dwelling unit total of 21,308. This total did not include the Entrada development, which is outside the boundary of the Specific Plan.

After approval of the Specific Plan, the Final EIR, certified by CDFW in 2010, analyzed the environmental impacts associated with the development facilitated by approval of the project. The analysis did not set an upper boundary on the number of residential units allowed, as the analysis was focused on the total acreage occupied by the project and associated impacts on lands and natural resources. Subsequent approvals by the County of Los Angeles, not CDFW, would set the maximum residential dwelling units for each village within the project. However, the project's 2010 Final EIR analyzed impacts resulting from a development of 20,885 residential dwelling units within the Specific Plan area, in addition to 1,725 residential dwelling units proposed for the Entrada development, for a total of 22,610 residential dwelling units associated with the project. (See CDFW, Final EIS/EIR for the Newhall Ranch RMDP/SCP, Table 2.0-6, at pp. 2.0-137.)

During the administrative process for the project, CDFW approved a reduced-size project with a smaller footprint to reduce environmental impacts. CDFW reduced the net developable acreage by 899.1 acres as compared to the proposed project. For illustrative purposes, the project applicant provided an updated conceptual land use table showing a total number of dwelling units facilitated by approval of the project that was reduced accordingly to 19,227 residential dwelling units (not including the Entrada development, for which the total number of residential dwelling units did not change). (See CEQA Findings of Fact and Statement of Overriding Considerations for the Master Streambed Alteration Agreement and ITPs Associated with the Newhall Ranch RMDP/SCP Table 4, at pp. 7.) Following the action, USACE continued its analysis of the project and issued a final Section 404 Permit in August 2011. The project description for the Section 404 permit contained an updated table of land uses facilitated by approval of the project, which showed a total of 19,517 residential dwelling units in the Specific Plan area (not including Entrada). (See U.S. Army Corps of Engineers, Section 404 Permit, Attachment 3 at Table 5, pp. 23, which is found in Final AEA Appendices 23 and 24)

The Draft AEA, prepared in 2016, analyzed the same land uses as were approved by USACE in the final Section 404 Permit. These land uses included 19,517 residential dwelling units in the Specific Plan area and an additional 1,725 dwelling units in the Entrada area, for a total of 21,242 residential dwelling units. (See AEA, Table 1.2-1, pp. 1-6.) As noted above, this total number of residential dwelling units is within the total number of residential dwelling units contemplated by the 2010 Final EIR.

Therefore, there is no inconsistency between the total number of residential dwelling units shown in the AEA and the number of residential dwelling units contemplated by the 2010 Final EIR.

Comment No. 025-16:

Was it also incorrect in the previous document?

Response No. 025-16:

Please see Response to Comment No. 025-15 above for discussion of the numbers of residential dwelling units analyzed in the AEA and in previous environmental documents for the project. The project, as analyzed in the AEA, would include up to 19,517 residential dwelling units in the Specific Plan/RMDP area and an additional 1,725 residential dwelling units in Entrada, for a maximum of 21,242 residential dwelling units in the RMDP/SCP area. This total number of residential dwelling units analyzed in the Draft AEA is consistent with the number of residential dwelling units contemplated by the 2010 Final EIR. In fact, because the AEA analysis includes a slightly lower level of assumed residential dwelling units than the 2010 Final EIR, the relative impacts associated with the AEA would be reduced relative to the 2010 Final EIR.

Comment No. 025-17:

If this housing inventory is incorrect, than the GHG generation figures are also incorrect.

Response No. 025-17:

Please see **Response to Comment Nos. 025-15 and 025-16** for discussion of the housing inventory for the project in the AEA and previous environmental analyses for the project. As explained therein, the housing inventory is correct as analyzed in the AEA, and the housing inventory in the AEA is consistent with the housing inventory contemplated by the 2010 Final EIR. As to GHG generation figures, the AEA analyzed the project's GHG emissions using the same housing inventory assumptions as were presented in the AEA. See Table 2-1 of Draft AEA Appendix 1, which shows that the project would include: 1,297 condominiums/townhouses and 428 single family housing units for a total of 1,725 residential dwelling units in the Entrada South development; and 11,201 condominiums/townhouses and 8,316 single family housing units for a total of 19,517 residential dwelling units in the Specific Plan area. The total number of residential dwelling units as analyzed in the Draft AEA is 21,242. Therefore, the housing inventory as analyzed in the Draft AEA is correct.

Comment No. 025-18:

Even if it was incorrect in the previous document, this is the next administrative approval and the information must be corrected now.

Response No. 025-18:

Please see **Response to Comment Nos. 025-15 through 025-17**, which discuss the numbers of residential dwelling units as analyzed in the AEA and in prior environmental documents for the project. The information is correct, and there is no need for any correction. As stated above, the housing inventory is correct as analyzed in the AEA, and the housing inventory in the AEA is consistent with the housing inventory contemplated by the 2010 Final EIR.

Comment No. 025-19:

The table also does not disclose impacts from the approximately 11 million sq ft of commercial that will be included as part of this project.

Response No. 025-19:

This comment appears to rely on incorrect information regarding the total amount of commercial development that would be included in the project. The project would include, at buildout, approximately 5,450,000 square feet of mixed-use commercial uses in the Specific Plan area, 450,000 square feet of

such uses in the Entrada area, and 3,400,000 square feet of such uses in the Valencia Commerce Center area, for a total of approximately 9,300,000 square feet of mixed-use commercial uses in the RMDP/SCP area. (See Draft AEA, Table 1.2-1, at pp. 1-6.) These numbers are consistent with what was analyzed previously in the project's 2010 Final EIR.

The environmental analysis in the Draft AEA takes into account the impacts that would result from development of approximately 9,300,000 square feet of mixed-use commercial uses. See Draft AEA Appendix 1, which calculates the GHG emissions from the project, and includes all residential, commercial, and other uses in the calculations.

Comment No. 025-20:

Nor does it apparently include GHG generation from these uses in the inventory, stating instead that "Project-related emissions of GHGs from the non-residential energy sector (i.e., electricity and natural gas) would be substantially reduced through implementation of Mitigation Measure 2-2. Through incorporation of zero-energy technology into all non-residential development associated with the project, as prescribed by a qualified energy efficiency and design consultant, fossil fuel-related sources of GHGs associated with energy use would not occur from project-related activities." (page 1-11) However the previous paragraph says that this will be accomplished by providing a Zero Net Energy Confirmation Report (ZNE Report) by a "qualified engineer," and further states that "A ZNE Report may, but is not required to" make several conditions to the permit approvals. This highlighted language is NOT enforceable, and based on our previous experiences with the County permitting process, will result in the conditions being ignored in favor of the developer.

Response No. 025-20:

The comment states that the project's GHG emissions inventory does not reflect energy consumption-related emissions from non-residential buildings, and also states that Mitigation Measure 2-2 is not enforceable.

First, as discussed on pages 2-17 and 2-18 of the Draft AEA, both natural gas combustion and electricity generation for the project's non-residential buildings were estimated. The unmitigated emissions associated with this development aspect of the project are identified in Table 2.3-3 of the Draft AEA. The beneficial effect of Mitigation Measure 2-2 is then identified in Table 2.3-4 of the Draft AEA.

Second, Mitigation Measure 2-2 has been revised, in response to comments and in an effort to further increase the clarity of the project's commitment to achieve CEC's ZNE standard. The ZNE standard is explicitly defined by CEC as requiring "the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using CEC's Time Dependent Valuation (TDV) metric." CEC has developed modeling tools that allow a qualified energy expert to determine if buildings are designed to achieve the ZNE standard, ensuring this standard can be measured and enforced by Los Angeles County prior to the project applicant obtaining a building permit (see Appendix C to Draft AEA Appendix 1 for description of the CEC's CBEEC software). The TDV metric measures the value of energy based on the time of use and other factors, such as cost, climate, geography, and fuel type.

The ZNE Confirmation Report required by Mitigation Measure 2-2 must be prepared by a qualified energy expert and demonstrate that the buildings covered by the building permits are designed to achieve the ZNE standard before building permit issuance, as enforced by Los Angeles County. In other words, the project applicant cannot pull a non-residential building permit before complying with Mitigation Measure 2-2. As discussed further in **Response to Comment No. 09-19**, the required contents of a ZNE Confirmation Report have been further clarified so the report "shall include, at a minimum," the following information: confirmation that development shall achieve building code standards that are operative at the time of building permit application, and identification of additional measures that shall be relied upon to achieve the ZNE standard, assuming ZNE is not already achieved by meeting the operative building standards. In sum, the ZNE Confirmation Report requires compliance with the ZNE standard prior to the issuance of a building permit, as enforced by Los Angeles County.

Comment No. 025-21:

We therefore believe that unless all such language found in the mitigation proposals is changed to “*Shall*” and “*is required to,*” this is not an enforceable mitigation. The word “independent” should also be included as a requirement for any consulting engineer or biologist or other consultant employed on the project. Further through a previous experience that required the County of Los Angeles to forbid confidentiality agreements with consultants, the county prohibits confidentially agreements with project consultants. Such agreements should also be formally precluded in these project mitigations and their prohibition made clear in all mitigation measures. ***We do not believe that these mitigation measures will be enforceable without such language, based on past experience, and thus they will not serve to reduce future GHG as required.***

Response No. 025-21:

The comment requests that all mitigation requirements use “shall” or “is required to” in an effort to specify that the mitigation is enforceable. In response, Mitigation Measures 2-1 through 2-13 already use “shall” in the appropriate and necessary locations.

The comment also requests that any consultant retained to assist with the implementation of the project’s mitigation commitments be “independent” and that confidentiality agreements be prohibited between the County of Los Angeles and its consultants. In response, the County necessarily would consider the qualifications and expertise of any consultant that assists with implementation of the project’s mitigation commitments consistent with industry qualifications for energy consultants evaluating compliance with building code standards, in an effort to specify that the consultant’s efforts are adequate and consistent with the requirements of the mitigation measure. However, the use of “independent” in this instance, as requested by the comment, is subjective and presents the risk of varied, inconsistent interpretation.

It is noted; however, that in connection with the County of Los Angeles’s 2003 approval for the Newhall Ranch Specific Plan, the following relevant conditions were imposed:

Consultant Disclosure Statements. Upon approval of the Specific Plan and in connection with the submittal of additional environmental documentation for the Newhall Ranch project, each consultant preparing, or participating in a study or investigation for, that additional documentation, shall provide a disclosure statement to the Director of Planning, signed under penalty of perjury, stating that they have disclosed to County staff all relevant environmental information and data obtained during their work, including, but not limited to, all information regarding the presence of any endangered, threatened or candidate species. (Adopted Newhall Ranch Specific Plan Additional Conditions of Approval, (h).)

The permittee shall contact its consultants to advise them that specific existing provisions in the consultant contracts allow consultants to disclose to the County all environmental-related information associated with the Specific Plan and related actions. The permittee shall further amend its contracts to either eliminate such confidentiality provisions or make clear that consultants are not precluded from disclosing and, in fact, are required to disclose environmental-related information regarding Newhall Ranch to the County. (Adopted Conditions of Approval, Conditional Use Permit No. 94-087-(5), 28.)

The permittee shall obtain disclosure statements, signed under penalty of perjury, from its consultants certifying that the consultants’ reports, studies, or other environmental-related information required for the Newhall Ranch Specific Plan EIR and additional analyses have been fully disclosed in that environmental documentation. (Adopted Conditions of Approval, Conditional Use Permit No. 94-087-(5), 29.)

In light of the County’s existing conditions of approval, and its role as the local land use jurisdiction charged with oversight and monitoring responsibilities in the project’s MMRP, no further revisions to the mitigation measures are required.

Comment No. 025-22:

The table in Section 2.1.1, page 34 notes a baseline of 3,790 metric tons of Co2 associated with methane from oil wells and 3,682 MT from energy use associated with oil wells. This figure is calculated according to Table A-2 (Appendix A) using 59 active wells and an average aggregate production rate of 10, 950. We note that all wells on the Mission Village tract have been closed for many years and closure reports were included in the last EIR. After viewing on Google Earth satellite images dated of the project area (dated Oct. 16, 2016), we can identify only around 28 oil pump jacks in the area North of Mentryville (Pico Canyon). We can't tell from a stationary view whether they are still operating. That is half the amount used in the Appendix A report to calculate baseline. An accurate and verifiable well inventory should be used to provide a baseline generation calculation. Please provide an independent source to verify active oil wells and oil production for this baseline calculation

Response No. 025-22:

The comment requests that an inventory of existing oil wells and their production be conducted on the project site due to concerns regarding the assumptions relied upon in the Draft AEA for purposes of the existing conditions emissions inventory. As background, the existing conditions emissions inventory was estimated using the same data parameters relied upon in the 2010 Final EIR, so as to avoid disrupting the baseline established in that EIR, which was not found to be inadequate by the California Supreme Court. (See **Topical Response 1: Scope of the Additional Environmental Analysis.**)

Importantly, the AEA's GHG emissions analysis does not take any credit for the existing conditions emissions inventory. Thus, if today's existing conditions were calculated to result in higher or lower emissions than that presented in the AEA, there would be no environmental consequence, as the mitigation commitments presented in the AEA require the project to reduce its GHG emissions to net zero, irrespective of the GHGs emitted by any existing sources, such as on-site oil wells. The AEA is conservative in this respect, as there is some amount of existing GHG emissions that could have been accounted for to reduce the GHG emissions increase reported in the AEA, thereby lowering the amount of GHG emissions being mitigated.

Comment No. 025-23:

We also note that Newhall did not calculate the carbon sequestration that will be lost through the destruction of existing vegetation, especially oaks and other trees. We believe this information should have been in the ADA

Response No. 025-23:

The comment incorrectly states that the AEA has not included a calculation for the loss in carbon sequestration due to the removal of existing vegetation. As explained on page 2-20 of the Draft AEA, "[t]he loss in sequestered carbon was also estimated in CalEEMod® using the vegetation module. Permanent vegetation changes occur as a result of land use development constitute a one-time change in the carbon sequestration capacity of a project site." Please see AEA Table 2.3-2, Vegetation Change Evaluation, which shows the carbon released as estimated by converting the organic biomass from the existing vegetation to CO₂e emissions in accordance with guidelines from IPCC. (See Draft AEA Appendix 1, Section 2.2.2 and Table 2-10b.)

Comment No. 025-24:

Changed Circumstances Requiring Further Review

Honor Rancho Gas Storage Facility and Thewlis Canyon Disaster

The recent catastrophic failure of the gas well at Aliso Canyon brought to our attention that a similar facility exists near the current project, the Honor Rancho Gas Storage Facility. To our knowledge this facility was not disclosed in the Hazards section of the previous EIR and should be disclosed now. One of the reasons for the failure at the Aliso Canyon site was a substantial increase in pressure in order to store more natural gas. Will

the approval of 21,000 housing units impact gas storage in this facility? Have methane leaks from this facility been considered in the GHG inventory? How far does the underground storage area itself extend?

Response No. 025-24:

This comment raises questions about the Honor Rancho Gas Storage Facility (“Honor Rancho”), which is located northeast of the project site and is owned and operated by SoCalGas. The comment does not provide any evidence to suggest that the Honor Rancho facility is affected by or relates to the modifications covered by the Draft AEA. The comment raises several questions about the Honor Rancho facility but the questions do not relate to the analysis presented in the AEA and the comment does not explain how the questions are pertinent to the AEA’s analysis. Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains how the scope of this environmental analysis is pursuant to and consistent with the 2015 decision issued by the California Supreme Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife* litigation. As discussed at length in that response, the Supreme Court’s decision only found fault with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords with the California Supreme Court’s decision.

The Supreme Court did not find fault with the analysis of hazards, hazardous materials, and public safety in the Final EIR, and that section of the Final EIR was not among the areas for which CDFW required additional environmental analysis. This comment does not identify any flaws with the prior analysis of hazards that require additional consideration based on the AEA.

Comment No. 025-25:

Water Supply

In the last 6-7 years since the full EIR review of this project was completed several new impacts have occurred which must require further review. These include new developments that will severely affect water supply and water quality in the Santa Clarita Valley.

Response No. 025-25:

This comment states that new impacts have occurred since certification of the 2010 Final EIR for the project, including impacts related to water supply and water quality, which require further review. Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains how the scope of this environmental analysis is pursuant to and consistent with the 2015 decision issued by the California Supreme Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife* litigation. As discussed at length in that response, the Supreme Court’s decision only found fault with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords with the California Supreme Court’s decision. Therefore, this comment is outside the scope of the AEA and no further response is required.

Further, both water supply and water quality were previously evaluated by CDFW in the 2010 Final EIR, Section 4.3, Water Resources, and Section 4.4, Water Quality. In addition, 2010 Final EIR Topical Responses TR-4 through TR-9 evaluated numerous water supply and water quality topics. Legal challenges to the 2010 Final EIR did not brief or adjudicate any water supply issues. In addition, the legal challenges that were filed did not result in the invalidation of any water supply or water quality analysis in the 2010 Final EIR. For these reasons, belated challenges to the 2010 Final EIR water supply and water quality analyses are beyond the scope of the AEA and time-barred. Further, the comment does not identify any particular flaw or omission in

the 2010 Final EIR's water supply or water quality analyses that require additional consideration based on the AEA. Therefore, no further response is required.

Comment No. 025-26:

Spread of Ammonium Perchlorate Pollution to Well V201 and Well V205 Ammonium perchlorate interferes with iodine uptake by the thyroid gland, thus producing hypothyroidism. This condition especially affects sensitive populations including fetuses, infants, small children and those with impaired immune systems. It can cause retardation in infants and children. While state officials have set the Maximum Contaminant Level (MCL) level at 6, others have urged an even lower MCL for ammonium perchlorate and the Environmental Working Group urges a 0 tolerance level for children. The public in this Valley were not even informed of the closure of this drinking water well until much later, and this information did not appear in the EIR for this project.

The EIR/EIS for the Newhall Ranch River Alteration Permit did not disclose or discuss this information. It and another well, (V205) remain closed as of today.

This is an extremely serious situation since it means that the pollution plume has moved beyond the "pump and treat" capture wells and is moving at a much faster rate of travel than previously estimated would occur. (See attached Maps for location of various water supply and monitoring wells and the extent of the plume).⁴ In 2004, the environmental community, including SCOPE, expressed alarm over the possibility of such a scenario, but the water agencies and others disregarded those concerns.

⁴ AECOM maps attached showing spread of the plume and well locations, Exhibit 2

If pumping from this well continues, such pumping may draw the pollution plume further in a westerly direction, thus spreading the contamination into an even greater portion of the Saugus aquifer and possibly making that ground water source unusable.

The continued spread of the pollution plume has major implications for water supply in the Santa Clarita Valley. The Saugus Aquifer is one of the two major sources of ground water that supplies our community. It is the source that has been relied upon in case of a drought where surface flow and imported State Water Project Water may become severely curtailed or not available at all.

In 2004 the Appellate Court⁵ found for the Friends of the Santa Clara River and the Sierra Club and set aside CLWA's 2000 Urban Water Management Plan for failure to provide a timeline indicating when treatment facilities for water polluted by ammonium perchlorate would be available.

⁵ *Friends of the Santa Clara River v. Castaic Lake Water Agency* (2004) 123 Cal.App.4th

That Decision included the following testimony from Department of Toxic Substances:

"The concentration of perchlorate in the production wells probably represents the leading edge of a much larger plume of higher concentrations of perchlorate. The total area of the Saugus Aquifer contaminated by the perchlorate has yet to be fully defined. We do know that the contaminant has migrated a minimum of 2 miles through the subsurface and over land to contaminate the vital pumping areas. (Exhibit 23.) Since the groundwater gradients in the contaminated area in the Saugus are towards the west, the contaminant is likely to continue to migrate further west and northwest. Time of travel from the soil contamination sites to the deep Saugus wells implies that the contaminant has been moving between 1 to 3 feet per day within the Saugus Aquifer.

This implies that the perchlorate could impact [VWC's] well No. 201 as early as next year. Further down gradient is [VWC's] well No. 160."

Also, Richard D. McJunkin, a senior hydrogeologist with the California Department of Toxic Substances Control, testified that increased pumping of water from wells near the contamination site will accelerate the flow of the perchlorate contamination.”⁶

⁶ *Ibid.* Opinion at page 10

We note that Valencia Water Co. has two additional down gradient wells, V205 (also now closed) and V206 that are major drinking water supply producers, in addition to the well 160 mentioned above. Continued pumping from these wells may (and has, for V201 and V205) result in their eventual closure. This is one of the most important reasons that further modeling and evaluation are needed before an additional 21,000 units receives final approval

In light of the 2004 precedent setting legal decision involving the Agency’s failure to adequately disclose the ammonium perchlorate pollution problem, we encourage the County and the Dept. of Fish and Wildlife to review water availability for this project before this document is certified.

Response No. 025-26:

This comment raises a concern regarding a known environmental condition, the ammonium perchlorate contamination found in groundwater in the Santa Clarita Valley. Similar comments were raised on the project’s 2010 Final EIR and responses were provided, including Topical Response 7 in the 2010 Final EIR, which updated the water agency regional efforts at perchlorate treatment.

Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains that the scope of this environmental analysis is pursuant to and consistent with the 2015 decision issued by the California Supreme Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife* litigation. As discussed at length in that response, the Supreme Court’s decision only found fault with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords with the California Supreme Court’s decision.

Thus, comments regarding ammonium perchlorate contamination in groundwater are outside the scope of the AEA and no further response is required. In addition, the 2010 Final EIR for the project provided robust analysis of this issue. (See RMDP/SCP Final EIS/EIR, Revised Sec. 4.3, Water Resources, Appendix F4.3, Topical Response 7: Perchlorate Treatment Update.) As explained in those documents, facilities for perchlorate remediation/treatment are in place and are actively working to solve this problem, and are actively monitored by the Castaic Lake Water Agency (CLWA), local retail purveyors, and several regulatory agencies including the Department of Toxic Substances Control (DTSC). This continues to be true today. All of the prior environmental analyses for the project conclude that there is an adequate water supply available to serve the projected future needs of the project and other existing and planned development in the Santa Clarita Valley. This conclusion has not changed.

It also is noteworthy that the 2010 Final EIR’s assessment of perchlorate contamination and treatment in the Santa Clarita Valley relied on information presented in the Draft EIR and updated information provided in a topical response. (See RMDP/SCP Final EIS/EIR, Topical Response 7: Perchlorate Treatment Update.) Based on that information, the Final EIR concluded that “substantial progress continues to be made in responding to perchlorate contamination resulting from the former Whittaker-Bermite site and that the facilities needed for perchlorate remediation/treatment are either in place or in the planning stages and actively monitored by CLWA, local retail purveyors, and several regulatory agencies including [DTSC].” (See 2010 Final EIR, Topical Response 7: Perchlorate Treatment Update, pp. TR-7-12.)

Similarly, CLWA’s latest 2015 Santa Clarita Valley Urban Water Management Plan (UWMP) addresses perchlorate contamination and treatment, summarizing the work that has occurred over the last 15 years

and concluding that its plans – all of which are subject to regulatory requirements – are intended to specify that the water introduced to the potable water distribution system has no detectable concentration of perchlorate and all water currently discharged from that system complies with all applicable drinking water standards. The 2015 UWMP also makes clear that, in terms of adequacy and availability, the combined active Saugus and Alluvial aquifer groundwater source municipal well capacity is more than sufficient to meet the current and planned future urban component of the groundwater supply for the Santa Clarita Valley (even after taking into account perchlorate-impacted wells, such as Valencia Wells 201 and 205, which are planned to be returned to service by 2017). (See the 2015 Santa Clarita Valley UWMP, pages 3-31 through 3-44 and 5-2 through 5-5.)

As this comment is outside the scope of the AEA, no further response is required.

Comment No. 025-27:

Drought

Over the last 6-7 years California has suffered an extreme drought throughout the state, but especially in the Santa Clarita Valley. Many of our alluvial drinking water wells went dry and remained so for several years. A report on alluvial pumping (attached, Exhibit 3) indicated that we cannot withdraw as much water as previously reported during such a period. As climate change progresses, such drought periods are predicted to become even more severe. The adequacy of water supply and the effects of pumping on the river habitat need to be re-evaluated before any decision is made that allows an additional 21,000 units.

Response No. 025-27:

This comment states that the adequacy of the water supply for the project and the effects of pumping from the local alluvial aquifer system should be re-evaluated in light of the recent drought in California, and refers to an attached memorandum prepared by GSI Water Solutions, Inc.

Please see **Topical Response 1: Scope of the Additional Environmental Analysis**, which explains how the scope of this environmental analysis is pursuant to and consistent with the 2015 decision issued by the California Supreme Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife* litigation. As discussed at length in that response, the Supreme Court's decision only found fault with the portion of the environmental analysis that addresses the significance of the project's GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords with the California Supreme Court's decision.

The analysis of water supply in the project's EIR is not among the areas for which additional environmental analysis was ordered by the Supreme Court. Therefore, this comment is beyond the scope of the AEA and no further response is required.

Although not required, the following is offered for information purposes. As explained in the prior environmental analysis, virtually all the potable water supply for the project would come from converting existing local agricultural water to municipal water. There would be no net increase in groundwater use beyond the amount historically supplied to the project site for agricultural purposes. To supplement this existing source of local potable water, the project applicant has entered into a separate agreement to purchase additional potable water from a private supplier in Kern County (i.e., Nickel Family LLC). As for non-potable water, all water supplies for irrigation and other non-potable uses within the project would be provided by local wastewater recycled at WRPs. Therefore, as explained in the earlier analysis, the project would not have a significant impact on water resources. For further responsive water supply-related information, please refer to the 2010 Final EIR, Section 4.3, Water Resources.

In addition, contrary to the statements in the comment, the Santa Clarita Valley is no longer in an extreme drought. Recent information from the U.S. Drought Monitor shows that the northern Los Angeles County

region is in either “abnormally dry” or “moderate drought” conditions, not a severe, extreme, or exceptional drought (The National Drought Mitigation Center 2017). This recent improvement in the region’s drought status is due to the heavy rainfall that occurred during the winter of 2016-17. Further, the Santa Clarita Valley’s wholesale water agency, Castaic Lake Water Agency, and its retail water purveyors, closely monitor and regularly update drought conditions and related regulatory measures as part of the UWMP process. The UWMP process requires updated plans every five years. The latest updated plan is titled, Final 2015 UWMP for Santa Clarita Valley. The 2015 UWMP provides a regional update of the Santa Clarita Valley water demands and supplies, including plans and regulatory measures for addressing drought conditions.

As this comment is beyond the scope of the AEA, no further response is required.

Comment No. 025-28:

Drainage/Hydrology

The Civil Engineer for the project Hydrology/Drainage studies appears to have misrepresented the 75th and 85th percentile for the area hyetograph. The permeability of the new engineered compacted fills is considerably less than reported. Such an error could affect the river flows, and thus will affect the habitat of the fully protected UTS. This data needs to be corrected and re-circulated.

Response No. 025-28:

The context of the comment is not clear. The topics of the 75th/85th storm hyetographs and infiltration rates were not used or relied upon in the Draft AEA. Therefore, it is assumed that the comment refers to the previously certified 2010 Final EIR and related administrative record, including EIR Section 4.4, Water Quality, and the Newhall Ranch Specific Plan Sub-Regional Stormwater Mitigation Plan. (See 2010 Final EIR, Appendix 4.4a.) Because the comment questions the 2010 Final EIR, and because the referenced technical information was not used in the Draft AEA, the comment is beyond the scope of the AEA’s environmental analysis, which was performed pursuant to and consistent with the 2015 decision issued by the California Supreme Court in the *Center for Biological Diversity v. California Department of Fish and Wildlife* litigation. As discussed at length in that response, the Supreme Court’s decision only found fault with the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback under Fish and Game Code section 5515. No other aspect of the environmental evaluation was re-opened and CEQA affords a strong presumption against requiring additional analysis. The revised notice for the Draft AEA, which limits requests for comments to the two topics addressed in the AEA, accords with the California Supreme Court’s decision. Nonetheless, for information purposes, the following additional information is provided.

As it relates to the comment concerning misstatements with regard to the 75th and 85th percentiles for the area hyetograph, this response assumes that the comment is referencing the 85th percentile, 24-hour storm, which was equated with a 0.75-inch storm in the 2002 Los Angeles County SUSMP Manual.

The sizing and analysis of stormwater BMPs in the 2010 Final EIR was not based on a 85th percentile storm hyetograph or 0.75-inch storm. As stated on page 68 of the 2010 Final EIR, Appendix 4.4a, “[v]olume-based treatment control BMPs for the NRSP projects would be sized to capture and treat 80 percent of the annual runoff volume.... This methodology uses historical rainfall data with continuous simulation modeling to calculate the treatment volume for each treatment control BMPs....” This is reiterated in multiple locations. Inputs to this methodology are described on page B-3 through B-6 of the 2010 Final EIR, Appendix 4.4a. In summary, the analysis is based on continuous simulation utilizing 35 years of hourly rainfall measurements recorded at the nearby Newhall rain gage (COOP 046162). Given the proximity and similar elevation of this gage to Newhall Ranch, this rainfall record is considered to provide a reliable estimate of actual rainfall patterns within Newhall Ranch. The average annual depth at this gauge is approximately 18 inches and there are approximately 15 events per year on average in excess of 0.1 inches. This was the basis for BMP sizing.

Any reference to a 0.75-inch storm or 85th percentile storm event that may be found in the 2010 Final EIR would likely have been in reference to a different BMP sizing option that was in use by Los Angeles County at that time. The use of real precipitation data and long-term continuous simulation were a different and equally-acceptable sizing option. It generally resulted in larger BMPs, and Los Angeles County allowed projects to use the 0.75-inch event at that time.

Since 2010, Los Angeles County has subsequently updated the 85th percentile, 24-hour storm for Newhall Ranch to be 1.1 inches. This went into effect in 2014. The current BMP sizing standards in place for the project are described in the Newhall Ranch Waste Discharge Requirements (Order R4-2013-0139) and are consistent with the 1.1-inch sizing criteria. The current sizing standards also continue to require BMPs to be sized to treat 80 percent of long term average annual runoff as originally described in the 2010 Final EIR.

Moreover, the comment states that the permeability of the new engineers compacted fills is considerably less than (sic) reported. In response, as described on page B-9 of the 2010 Final EIR, Appendix 4.4a, adjustments have been made as part of stormwater quality modeling to account for the general effects of soil compaction in the analysis of potential water quality impacts. It is unclear what “reported values” this comment is referring to. The technical basis for this comment is similarly unclear. Nonetheless, though beyond the scope of the AEA.

Comment No. 025-29:

Conclusion

SCOPE joins with other organizations and members of the community in asking that the California Fish and Wildlife not certify this Additional Information Document without addressing the issues above and including additional chapters in order to fully assess the increase to GH Gases caused by this project.

Response No. 025-29:

This comment provides a conclusion to comments raised above. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 025-30:

DEVELOPMENT PLAN
2.3 LAND USE PLAN

TABLE 2.3-1

OVERALL LAND USE PLAN STATISTICAL TABLE
Newhall Ranch Specific Plan

LAND USES	Gross Acres	Dwelling Units	Second Units ¹	Approx. Acre Allocation	
				Land Use Overlays	
Residential:				10 Neighborhood Parks	50 ac
Estate ¹	1,324.0	423	423	5 Elementary Schools	35 ac
Low	744.4	671		1 Junior High School	25 ac
Low-Medium	1,781.7	6,000		1 High School	45 ac
Medium	841.0	7,371		1 Golf Course	180 ac
High	121.8	2,319		2 Fire Stations	2 ac
Subtotal	4,812.9	16,784	423	1 Library	2 ac
Mixed-Use and Non-Residential:				1 Water Recl. Plant	15 ac
Mixed-Use ²	628.7	4101		1 Lake	15 ac
Commercial	67.2			3 Community Parks	181 ac
Business Park	248.6			1 Electrical Substation	2 ac
Visitor Serving	36.7			Arterial Roads	331 ac
Subtotal	981.1	4,101	0		
Major Open Areas:					
High Country SMA	4,184.6				
River Corridor SMA	974.8				
Open Area	1,010.4				
Subtotal	6,169.8	0	0		
TOTAL	11,963.8	20,885	423		
(Total Units including Second Units ¹)		21,308			

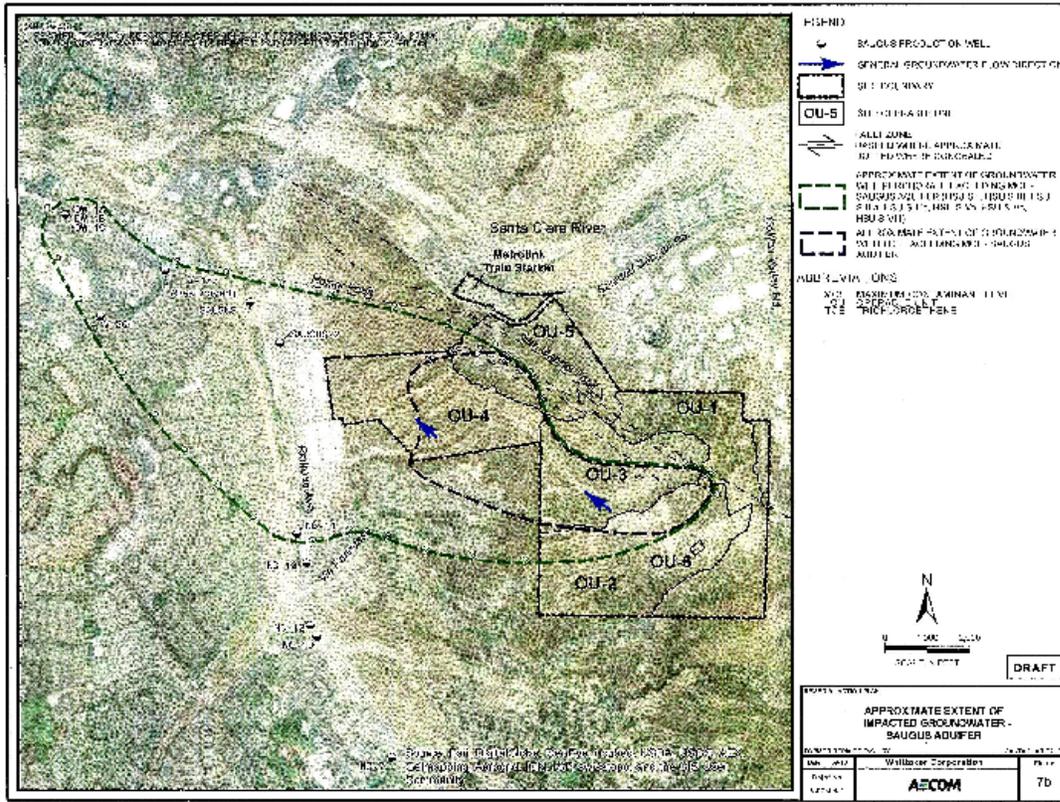
¹ Within each Estate lot one (1) Second Unit is eligible to be constructed with the approval of a CUP (see Second Units, Section 3.9). This may increase the total number of permitted dwelling units of 20,885 by 423, to a maximum total units of 21,308.

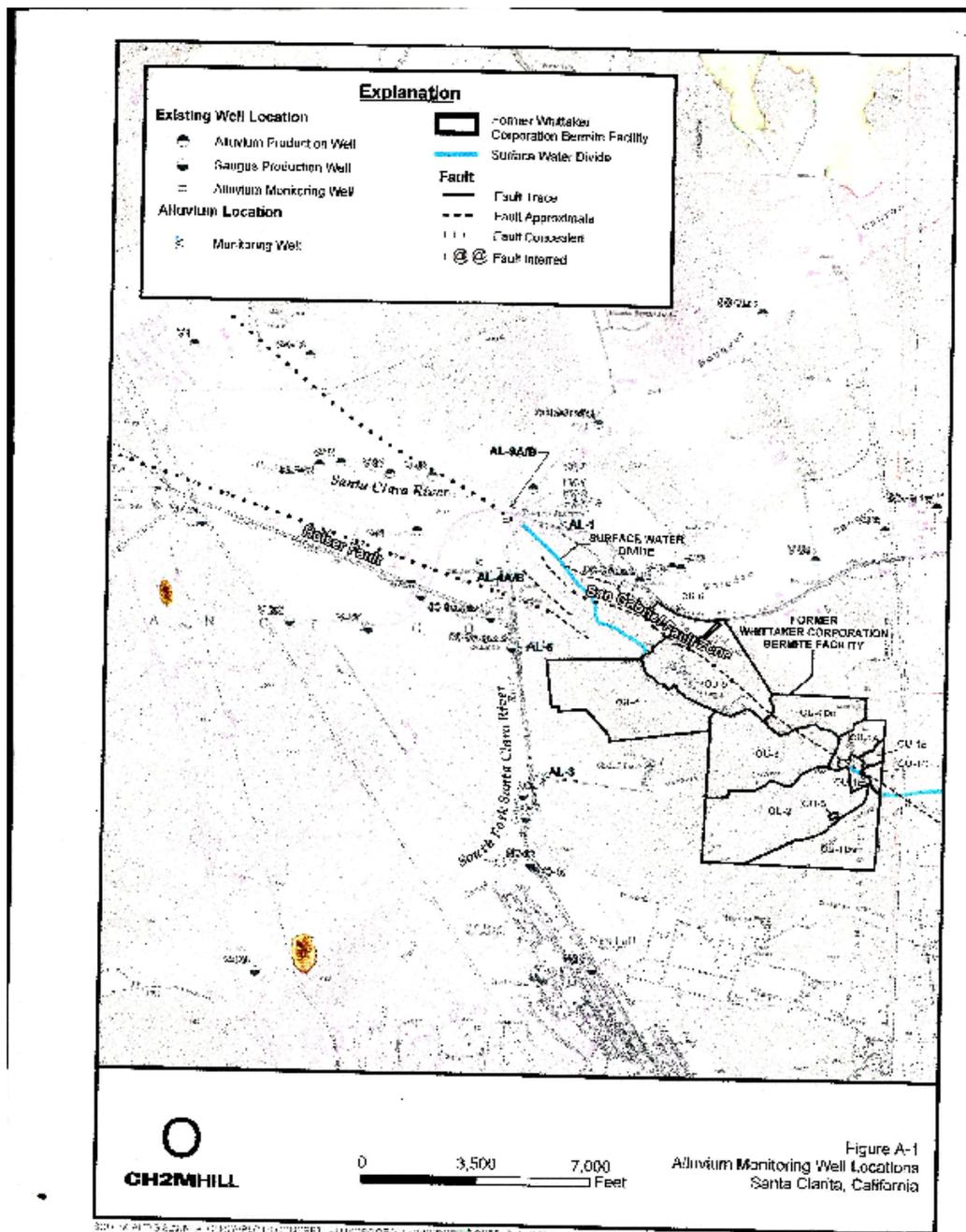
² Mixed-Use includes commercial and residential uses.

Response No. 025-30:

This is a table taken from the Newhall Ranch Specific Plan, and it is referenced in Comment No. 025-15. Please see **Response to Comment No. 025-15** for a response to this comment.

Comment No. 025-31:





Response No. 025-31:

These are maps referenced in Comment No. 025-26, which the comment cites in support of the argument that ammonium perchlorate contamination in groundwater in the Santa Clarita Valley is traveling.

Please see **Response to Comment No. 025-26** for a response to this comment. This comment raises issues that are beyond the scope of the AEA, and no further response is required.

Comment No. 025-32:



DRAFT Technical Memorandum

To: Keith Abercrombie/Valencia Water Company
Steve Cole/Newhall County Water District
Mauricio Guardado/Santa Clarita Water Division of CLWA
Dirk Marks/Castaic Lake Water Agency (CLWA)

From: John Porcello/GSI Water Solutions, Inc.
Walt Burt/GSI Water Solutions, Inc.

Date: December 15, 2014

Subject: Evaluation of Groundwater Pumping Targets for the Alluvial Aquifer in 2015
Santa Clara River Valley East Subbasin (Santa Clarita Valley, California)

Introduction

This technical memorandum presents the results of an analysis conducted by GSI Water Solutions, Inc. (GSI), to evaluate the achievability of target production volumes identified by the local retail water purveyors for groundwater pumping during 2015 from the local Alluvial Aquifer system in the Santa Clarita Valley, California. As specified in GSI's scope of work (dated October 6, 2014), this effort evaluated whether the target production volumes from Alluvial Aquifer wells during 2014 would be achievable in 2015 if ongoing local drought conditions and curtailments of State Water Project water were to continue into 2015.

The analysis was conducted for the 33 purveyor-owned production wells that currently operate in the Alluvial Aquifer (15 wells owned and operated by Valencia Water Company [VWC]; 6 wells owned and operated by Newhall County Water District [NCWD]; and 12 wells owned and operated by the Santa Clarita Water Division [SCWD] of the Castaic Lake Water Agency [CLWA]). The purveyors' Groundwater Operating Plan calls for the Alluvial Aquifer to provide between 30,000 and 35,000 acre-feet per year (AFY) of groundwater supply during local drought years. Of this amount, approximately 27,500 AFY are specified to be pumped by the three retail water purveyors (VWC, SCWD, and NWCD). The Groundwater Operating Plan was first established for the local groundwater basin during the 2000s (CH2M HILL and LSCE,

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2005) and subsequently was updated in 2009 (LSCE and GSI, 2009) and 2014 (GSI and LSCE, 2014).

From the fall of 2013 through the fall of 2014, the three retail water purveyors together pumped approximately 25,000 AFY of Alluvial Aquifer groundwater, or about 10 percent less than the 27,500 AFY target production volume that is identified in the Groundwater Operating Plan for the Alluvial Aquifer during locally dry years. Several wells experienced difficulty achieving their target volumes during 2014, particularly wells owned by SCWD and NCWD that are located in the upper reaches of the watershed (where groundwater levels and groundwater recharge rates are highly sensitive to year-to-year variations in rainfall and streamflow). During the period from the fall of 2013 to the fall of 2014, each of three wells owned by SCWD pumped less than 100 AFY, and four wells owned by SCWD did not operate at all. Personnel from SCWD and NCWD have stated to GSI that in the absence of recharge during the winter of 2014/spring of 2015, more wells could be taken offline or used in an even more restricted manner than occurred in 2014.

Approach

GSI's study approach consisted of first developing an initial assessment of each well's recent and projected operating condition. In November 2014, GSI provided these detailed assessments to each purveyor for their review, comment, and follow-on discussion. GSI then conducted a final assessment that incorporated any new information provided by a given water purveyor, as well as any changes to the 2015 target pumping volumes that the retail water purveyor requested by analyzed.

For both the draft and final assessments, the results were derived by combining (1) groundwater modeling projections of groundwater level trends in the aquifer with (2) information on well designs, pump settings, and pumping operations at each production well. The groundwater modeling work was conducted using the water purveyors' numerical model of the local groundwater basin. GSI's analysis assumed that in 2015:

- No new wells would be drilled.
- No modifications would occur to the depths or shut-off settings at any existing well.
- No deepening, reconditioning, or other alterations would occur to the construction of any existing well.

Conclusions

Rainfall records, groundwater level monitoring, and groundwater modeling together indicate that little to no recharge has occurred to the Alluvial Aquifer since the winter of 2010/spring of 2011 rainfall season. The groundwater level monitoring program shows that groundwater levels have declined at a fairly steady rate since that time, as has been observed in other past periods of local drought conditions (such as occurred in 1984 through 1992 and again in 1999 through 2004). The continued decline in groundwater levels that was observed in 2014 at many Alluvial Aquifer wells will continue in 2015 if little to no rainfall and streamflow recharge occurs to the local aquifer systems during the winter of 2014/spring of 2015 rainfall season.

Under this scenario, and assuming there are no new wells or modifications to existing wells and pumping systems, GSI's primary conclusions regarding the achievability of the target pumping volumes from the Alluvial Aquifer in 2015 are presented in Table 1 and are summarized as follows:

1. For the three retail water purveyors combined, the achievable yield from the Alluvial Aquifer in 2015 is likely between 17,100 and 21,800 AFY. The Groundwater Operating Plan's drought-year target of 27,400 AFY of collective production by the three retail water purveyors will not be achievable if the drought continues through the winter of 2014/spring of 2015 rainfall season.
2. The largest shortfall in yield is estimated to occur for VWC. The estimated achievable production volume for VWC wells (between 14,600 and 17,900 AFY in 2015) creates shortfalls of (a) 3,600 to 6,900 AFY compared with VWC's target production under the Groundwater Operating Plan and (b) 1,100 to 4,400 AFY compared with the 2015 target production volume that was of interest to VWC.
3. The estimated shortfalls in groundwater production from the Alluvial Aquifer are notably smaller for SCWD and NCWD than for VWC.
 - a. SCWD's wells likely can produce between 1,700 and 2,700 AFY from the Alluvial Aquifer in 2015. This represents a shortfall of 1,800 to 2,800 AFY compared with the Groundwater Operating Plan, and a shortfall of 1,500 to 2,500 AFY compared with the 2015 target production volume that was tested by GSI.
 - b. NCWD's wells likely can produce between 800 and 1,200 AFY from the Alluvial Aquifer in 2015. This represents a shortfall of 200 to 600 AFY compared with the Groundwater Operating Plan, and a shortfall of zero to 500 AFY compared with the 2015 target production volume that was tested by GSI.
4. The estimates of the achievable yield listed in Table 1 are reasonable estimates of the groundwater production capacity from the Alluvial Aquifer that the three retail water purveyors can expect to achieve in 2015 should the local drought

continue. Actual groundwater production volumes from the Alluvial Aquifer could be notably higher if there are appreciable amounts of rainfall, streamflow, and groundwater recharge during the winter of 2014/spring of 2015 rainfall season.

5. Some of the purveyors' wells currently have pump depths that pose a significant limitation on usage of the well. Higher volumes of production may be possible in 2015 if the pumps are lowered for those wells where the pumps are set notably higher than the bottom of the well. Based on GSI's analysis and conversations with representatives of each water purveyor, it appears that the right physical conditions may exist to lower the pump columns of certain wells (7 wells owned by VWC; at least 1 well, and perhaps 5 wells, owned by SCWD; and 2 or 3 wells owned by NCWD). However, any increases in 2015 groundwater production that arise from lowering the pump at a given well may prove to be only temporary if the drought continues. This in turn means that the post-modification production volumes *after* 2015 could be the same as (or lower than) the production that would have been achieved *during* 2015 without any modifications to the pumps and their shut-off settings.

References

CH2M HILL and LSCE. 2005. *Analysis of Groundwater Basin Yield, Upper Santa Clara River Groundwater Basin, East Subbasin, Los Angeles County California*. Prepared for The Upper Basin Water Purveyors (Castaic Lake Water Agency, Newhall County Water District, Santa Clarita Water Division of CLWA, and Valencia Water Company) by CH2M HILL and Luhdorff and Scalmanini Consulting Engineers (LSCE). August 2005.

LSCE and GSI. 2009. *Analysis of Groundwater Supplies and Groundwater Basin Yield, Upper Santa Clara River Groundwater Basin, East Subbasin*. Prepared for the Santa Clarita Valley Municipal Water Purveyors by Luhdorff and Scalmanini Consulting Engineers (LSCE) and GSI Water Solutions (GSI). August 2009.

GSI and LSCE. 2014. *Draft Report: Perchlorate Containment Plan for Well V201 and Saugus Formation Groundwater in the Santa Clarita Valley (Task 3 of the Well V201 Restoration Program)*. Prepared for Valencia Water Company. Prepared by GSI Water Solutions (GSI) and Luhdorff and Scalmanini Consulting Engineers (LSCE). March 2014.

Table 1
Alluvial Aquifer Pumping Analysis for 2015 - All Retail Water Purveyors
 Prepared by GSI Water Solutions, Inc.

DRAFT

Retail Water Purveyor	Drought-Year Pumping Target in Groundwater Operating Plan	2015 Pumping Target Tested by GSI	Estimated Achievable Yield in 2015 from Existing Alluvial Aquifer Wells	Potential Shortfall in Meeting the Drought-Year Pumping Target in the Groundwater Operating Plan	Potential Shortfall in Meeting the 2015 Pumping Target Tested by GSI	Retail Water Purveyor
VWC	21,500	19,000	14,600 to 17,900	-6,900 to -3,600	-4,400 to -1,100	VWC
SCWD	4,500	4,200	1,700 to 2,700	-2,800 to -1,800	-2,500 to -1,500	SCWD
NCWD	1,400	1,300	800 to 1,200	-600 to -200	-500 to -100	NCWD
TOTAL	27,400	24,500	17,100 to 21,800	-10,300 to -5,600	-7,400 to -2,700	TOTAL

All volumes are in units of acre-feet per year (AF/year).

All listed values for shortfalls and likely achievable yields are estimates and are not guaranteed.

VWC = Valencia Water Company SCWD = Santa Clara Water Division of the Castaic Lake Water Agency NCWD = Newhall County Water District

DRAFT Table1 2015RedistributionAnalysisSummary (12-15-2014).xlsx

Response No. 025-32:

This is a report on groundwater pumping targets for the alluvial aquifer in the Santa Clara River Valley East Subbasin and is cited in Comment No. 025-27 in support of an argument that the project's water supply analysis should be updated. Please see **Response to Comment No. 025-27** for a response to this comment. This comment raises issues that are beyond the scope of the AEA, and no further response is required.

026. Letter from Santa Clarita Valley Auto Dealers Association, dated January 26, 2017

Comment No. 026-1:

The Santa Clarita Valley Auto Dealers Association fully supports Newhall Ranch and its first two communities, Landmark Village and Mission Village. Our Association is comprised of 18 dealerships, and represents one of the largest combined collections of auto dealers in Los Angeles County, and a significant source of sales tax revenue and employment for the local economy.

On behalf of the Association, we are sending letter in support of the Net Zero Newhall initiative, which would make Landmark Village, Mission Village and the overall Newhall Ranch community, a precedent- setting project in California and the nation. Electric vehicles and hybrids have become quite popular, and will no doubt be selected by an even greater percentage of the population, as electric vehicle charging stations, such as those provided at Newhall Ranch, become available throughout the region, and with every home.

Speaking for our 18 dealerships, representing 24 outstanding brands of automobiles with employees that not only work, but live in this area, we welcome a plan of this quality and sustainable environmental innovation. Combined with the preservation of 10,000 acres of open space, the complete Newhall Ranch community will result in a coveted lifestyle for residents. In addition, Newhall Ranch will provide much needed job growth to our region as well as critically needed new housing.

As forward-thinking businesses owned by some of the Santa Clarita Valley's most involved civic leader our mission is clear: we must constantly innovate to find ways to pursue smart growth in environmentally sustainable ways and protect quality local jobs that will best position us to compete in the 21st century economy.

Once again, we fully support Newhall Ranch and its first two communities, Landmark Village and Mission Village.

Response No. 026-1:

The comment expresses support of Landmark Village and Mission Village projects, which are located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs, the preservation of open space, as well as the job growth and new housing resulting from the development associated with the project. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

027. Letter from Santa Clarita Valley Chamber of Commerce, dated February 13, 2017

Comment No. 027-1:

Please see attached letter. Thank you.

Response No. 027-1:

The comment introduces the attached comment letter. The comments set forth in the attached letter are addressed below (see **Comment Nos. 027-2** through **027-2** and their corresponding responses). The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 027-2:

I write to you representing the Santa Clarita Valley Chamber of Commerce, a chamber that has recently grown to also represent the SCV Latino Business Alliance and the Castaic Chamber of Commerce comprised of 1,400 businesses representing thousands of employees.

Response No. 027-2:

This comment provides information regarding the organization that authored **Letter No. 027**. No further response is required. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 027-3:

We are excited about Newhall Ranch moving forward as this project not only generates much needed housing but also is an economic driver that will benefit the region and state tremendously.

The Newhall communities will ultimately generate thousands of permanent jobs and create millions of dollars in annual income and sales tax revenues after the build out. All of this while simultaneously working to combat climate change under the Net Zero Newhall initiative that is consistent with the recently approved climate measures SB32 and AB197, with no net greenhouse gas emissions for the development. This bold new measure is cutting edge and one that we welcome here in the Santa Clarita Valley. This, coupled with FivePoint's continued dedication to preserving open space, truly makes this the most sustainable development of our time.

The Newhall Ranch Development is an opportunity not only to address the need for much needed local jobs, but also address the housing crisis. The lack of home inventory is increasing housing costs making affordability making it more difficult for families to buy a home. With Newhall Ranch, we are pleased to see a variety of homes that will be available at various price points. This will enable many families to afford a home.

There are so many economic benefits associated with this project. In addition, knowing that the GHG and stickleback fish issues can be resolved enable the Santa Clarita Valley Chamber of Commerce to strongly support this development.

Response No. 027-3:

This comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the housing, including affordable housing, employment generation, the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions, and as well as the preservation of open space resulting from the development associated with the project. The comment also expresses specific support for the commitment being made to reduce and avoid impacts to the unarmored threespine stickleback. This

comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

028. Letter from Santa Clarita Valley Economic Development Corporation, dated February 13, 2017

Comment No. 028-1:

Attached please find a letter from Holly Schroeder in support of the Newhall Ranch project. Thank you and have a great day.

Response No. 028-1:

The comment introduces the attached comment letter, which is addressed in **Comment No. 028-2** and its corresponding response. The comment also expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 028-2:

On behalf of Santa Clarita Valley Economic Development Corporation (SCVEDC) it is my pleasure to write a letter of support for Newhall Ranch proposed by FivePoint. As you may know, the SCVEDC has been instrumental in establishing the greater Santa Clarita area as one of L.A. County's most business-friendly regions. We have helped to bring thousands of new jobs to the Santa Clarita Valley and have recruited prominent companies that may have otherwise taken their business out of state.

As President and *CEO* of SCVEDC, I believe that FivePoint's *vision* for Newhall Ranch represents an unprecedented economic development opportunity for the Santa Clarita Valley. The project will provide much needed housing for our growing population - including affordable housing - and the complete Newhall Ranch community will create 60,000 permanent new jobs for the region.

Our state leads the nation in embracing new technologies, ranging from clean energy to sustainable transportation. FivePoint is embracing state of the art technology in every aspect of its design, resulting in a community that creates zero net greenhouse gas emissions. From providing subsidies to speed the adoption of electric vehicles to embracing the use of solar energy, FivePoint's Net Zero Newhall initiative represents a new paradigm for community development in California and the nation. In addition, Net Zero Newhall will help our region develop as a hub for clean technology jobs and innovation, diversifying our local economy into dynamic and fast-growing areas.

Beginning with Valencia - a community created by the same local developers behind Newhall Ranch - the Santa Clarita Valley has a long history of creating livable neighborhoods that encourage active, outdoor lifestyles. FivePoint's groundbreaking plan for Newhall Ranch will give us the opportunity to attract continued innovation to the Santa Clarita Valley that will advance our mission of promoting sustainable economic growth for the benefit of all residents- current and future!

Please join me in supporting FivePoint in their exciting and innovative new endeavor, Newhall Ranch - Net Zero Newhall.

Response No. 028-2:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the housing, including affordable housing, employment generation, and the preservation of open space resulting from the development associated with the project. The comment also expresses support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

029. Letter from James Flournoy, Save Our Community SGV, dated February 13, 2017

Comment No. 029-1:

Thank you for accepting our comments on the revised Newhall ranch proposals

Response No. 029-1:

The comment is appreciated. It represents an introduction to comments that follow. No further response is required.

Comment No. 029-2:

Compiled by members including 2 Geologists, a building official, a Contractor experienced in schools, hospitals and industrial/commercial, and an inspector for Refineries (all retired)

final edit by James Flournoy

Response No. 029-2:

The comment identifies the individuals that compiled and edited the comments. Because the comment does not raise any issue as to the adequacy of the Draft AEA, no further response is required.

Comment No. 029-3:

Intro is in “Newhall Ranch Submissions” which covers the Regulatory Environment

Response No. 029-3:

The comment makes general reference to documents attached to the comment letter. One of the attachments references comments under a heading, “Regulatory Environment.” The “Regulatory Environment” excerpts have been reviewed by CDFW and its technical consultants. Please also refer to **Response to Comment No. 029-8** for further response to the referenced documents.

As explained in the Draft AEA, pages 1-1 through 1-5, the scope of the court decisions issued in connection with the Newhall Ranch RMDP/SCP project and related litigation provides the basis for the environmental issues addressed in the Draft AEA. These court decisions do not require reanalysis of all environmental impacts evaluated in the 2010 Final EIR. Instead, limit the reanalysis to two distinct issues – the portion of the environmental analysis that addresses the significance of the project’s GHG emissions and the validity of two mitigation measures for the unarmored threespine stickleback, a freshwater fish designated as endangered by federal and state law and fully protected under Fish and Game Code section 5515. No other aspect of the prior 2010 Final EIR was re-opened and CEQA affords a strong presumption against requiring additional environmental analysis once an EIR has been prepared for a project. Thus, comments concerning the 2010 Final EIR’s seismic hazards analysis are beyond the scope of the AEA and related court decisions. For further responsive information, please refer to **Topical Response No. 1: Scope of the Additional Environmental Analysis**. Nonetheless, for information purposes, the following additional responses are provided.

The 2010 Final EIR included Section 4.13, Geology and Geologic Hazards. This section provided an overview of existing geologic conditions within the project area, and evaluated the potential for the project and the alternatives to result in significant direct and indirect environmental impacts related to geologic hazards and process. This section also analyzed whether the project and alternatives would have the potential to expose people or structures to significant geological hazards such as fault rupture, ground motion, liquefaction, and landslides. The analysis also evaluated the potential for the project and alternatives to result in significant erosion and sedimentation impacts.

Additionally, the 2010 Final EIR evaluated potential geologic hazard impacts from the two major components of the Project. The first component, the RMDP, involves the development of infrastructure in the Santa Clara River and its tributary drainages. The second component is the adoption of the SCP, which identifies spineflower preserves within the project area. Implementation of the RMDP/SCP project components would facilitate development of the previously approved Newhall Ranch Specific Plan, the Valencia Commerce Center (VCC), and a portion of the Entrada planning area. Therefore, the section also provided a summary of indirect geology hazard impacts that have the potential to occur as a result of the build-out of the Specific Plan, VCC, and a portion of the Entrada planning area.

Further, the 2010 Final EIR incorporated numerous mitigation measures to ensure compliance with all planned, regulatory, and other requirements. In addition to the adopted mitigation measures, the project remains subject to all building code requirements with regard to seismic hazards. They are imposed by law as adopted regulatory measures, and the project applicant must adhere to all seismic-related adopted laws, regulations, and ordinances prior to undertaking any construction within the project site. These adopted regulatory requirements include project applicant adherence to all applicable Los Angeles County Building Code requirements at the time of construction. The regulatory requirements include adherence to all applicable provisions of the Seismic Hazards Mapping Act, which was summarized in the “Regulatory Setting” section of the 2010 Final EIR.

Comment No. 029-4:

Newhall final comments Seismic also includes references which we hope are helpful

Response No. 029-4:

CDFW acknowledges it has received and reviewed the Seismic references. Please refer to **Response to Comment No. 029-9** for further response to the referenced document. Please also refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required.

Comment No. 029-5:

Cyber Shake give an example of a computer modeled seismic study we also suggest Terrashake especially for the hazard of the distant San Andres Fault.

Response No. 029-5:

CDFW acknowledges it has received and reviewed the CyberShake references. Please refer to **Response to Comment No. 029-10** for further response to the referenced document. Please also refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. No further response is required.

Comment No. 029-6:

Bibliography also contains comments

Response No. 029-6:

CDFW acknowledges it has received and reviewed the Bibliography references provided. Please refer to **Response to Comment No. 029-11** for further response to the referenced document. Please also refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. No further response is required.

Comment No. 029-7:

Syndor is an excellent cookbook for major projects- it must updated to current CBC and CGS Note 48 checklist it is also prior to Terrashake/Cybershake but does cover Seismograms

Response No. 029-7:

Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. No further response is required.

Comment No. 029-8:

Provided below is the first page of Attachment 1 to Letter No. 029. A full copy of the attachment is available on the CD located on the inside cover of Volume 1 of the Final AEA.

ATTACHMENT 1
PAGE 1 OF 19

specialprojects@planning.lacounty.gov
Diane Aranda Special Projects Section
daranda@planning.lacounty.gov
Newhall Ranch submission
USF&W
newhallranch@wildlife.ca.gov

Planning Commissioners:

Thank you for accepting our comments on the revised Newhall ranch proposal

Draft Additional Environmental Analysis for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan Environmental Impact Report (SCH No. 2000011025)

REGULATORY ENVIRONMENT

We are concerned that under CEQA 15162

- (3) There is New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete
- a) the lead agency MUST determine, on the basis of substantial evidence in the light of the whole record, one or more of the following:

For example the adoption of the 2016 Los Angeles County Building Code with Local amendments which substantially changes the way earthquake and liquefaction must be analyzed.

- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- to wit: the Project proposes major changes in Bridges and Embankments and the construction of critical infrastructure including Schools, Fire Stations, Cell Towers, Water Tanks and water distribution used for fire fighting

AND there have been substantial recent findings on earthquake hazards which have not been considered

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

there have been substantial recent findings on earthquake hazards which have not been considered

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a).

Response No. 029-8:

CDFW acknowledges the attachment titled, "Newhall Ranch submission." Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required. Nonetheless, for information purposes, the following response is provided.

The submission contains references to seismic hazard assessment and building design to address this hazard. The information emphasizes the regulatory requirements for third party review and independent review of building designs. The information also stresses that buildings designed and constructed within the boundary of the project must be built according to current standards for seismic analysis and design.

The Draft AEA does not specify any building or foundation designs for development within the project. These will be provided by the County of Los Angeles at the building permit stages – consistent with all applicable regulatory requirements. As with all areas in Southern California, development will be subject to seismic hazards associated with local and regional fault systems. As such, site uses will be subject to the then current building codes addressing seismic hazards enforced by the County at the time the designs and supporting analyses are presented for review.

The 2010 Final EIR described in detail the faults in the vicinity of the site, including the Holser Fault, Del Valle Fault, Santa Susana, Northridge (East Oakridge), Sierra Madre (San Fernando) reverse/thrust faults, and the San Andreas Fault system. It also thoroughly described the three common types of geologic hazards that may be produced during a seismic event (e.g., earthquake): ground rupture, ground motion, and ground failure.

The 2010 Final EIR also incorporated numerous mitigation measures related to geotechnical issues, including seismic issues, liquefaction, landslides, compaction, and required design standards. These measures specify performance criteria and building design standards that future building design and construction must meet, including requirements for third party and independent review. Implementation of the mitigation measures will ensure compliance with all regulatory and geology-related requirements. Additionally, as required by applicable adopted regulatory measures, final designs and design review must follow the building standards current at the building permit stage of the regulatory process.

Comment No. 029-9:

Provided below is the first page of Attachment 2 to Letter No. 029. A full copy of the attachment is available on the CD located on the inside cover of Volume 1 of the Final AEA.

ATTACHMENT 2
PAGE 1 OF 16

SEISMIC STUDY Final COMMENTS

Since you can't use the Seismic Hazard Map and Report to get seismic anymore and you have to do Deterministic AND Probabilistic site-specific hazard analysis and you can't use the USGS or CGS quick and dirty on line look ups and since you are doing bridge

We thought we would help by introducing you to the CalTrans ARS tool. It gives distances to local faults- well most of them.

A couple of caveats. It is based on the old CalTrans map which uses different fault segments than the current USGS and CGS maps which are based on the SCEC Community Fault Model- citations later and it does not contain all – especially the thrust faults.

WE know Lillian Maulchin retired. CalTrans Chief Seismologist who did the maps and Martha Merriman who developed this fine tool-also retired and we do not know if CalTrans currently is budgeted for a real Seismologist- pity.

The distances given MUST be double checked as they are given to the middle of a fault segment or the middle of a thrust fault plane where a project may be near the fault tip. On thrust faults it makes a big difference if the thrust is sloping toward the project or down and under the project or sloping down and away (hanging wall footwall and all that).

The ARS tool knows nothing of basins – reflections (the "perfect storm effect") or basin depth amplification or directivity or sources or paths, or velocities from the source to the site. It does not know if the source is in or under a basin or the path comes from the outside into the basin. It knows nothing about basin excitement- the bowl of jello effect. It basically uses distance magnitude, attenuation relationships (NOT NGA-2) and VS-30.

It does not cover multiple segment breaks

It does not do Vertical

ARS still uses NGA Attenuation Relationships and not the current NGA-2 ones- it comes close on ROCK Sources and Paths and Sites but not so much as soils get softer

But it's a start.

WE DO NOT CONSIDER THAT NGA or any AR or GMPE give the required site-specific ground motions required for this project. The do not consider source- path and site as required.

The CalTrans uses a near fault method that is an improvement over CBC-98 see their references. We would expect the CBC 98 Near Fault Table 16 Ca and Cv to be generated for reference.

The footnote to table 16 requires that Thrust faults be considered.

The consultants get to generate their own site-specific curves using all the factors mentioned above. THE ARS app does not begin to get long period ground motion from large distant events anywhere close to right.

Why not use Blake EQFAULT & FRISK? AFIK Blake still uses the CGS 2002 California Fault Model <http://www.thomasblake.com/images/CGSALB1-LetterAll.pdf>

Same basic problems of data adequacy, current data, transparency, and

to use it takes a lot of hand tweaking for every fault and then it's hard to tell what you have

You can run this ARS app with locations and various VS-30

BASIN DEPTH DEPTH/ MAP is required

dap3.dot.ca.gov/ARS Online/

Technical reference is here http://dap3.dot.ca.gov/ARS_Online/technical.php

Methodology for Developing Design Response Spectrum for Use in Seismic Design Recommendations November 2012

http://dap3.dot.ca.gov/ARS_Online/Tech_Docs/Methodology%20for%20Developing%20DRS_12-5

Response No. 029-9:

CDFW acknowledges the attachment titled, "Seismic Study Final Comments." Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all

applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required. See **Response No. 029-8** for additional information.

Comment No. 029-10:

Provided below is the first page of Attachment 3 to Letter No. 029. A full copy of the attachment is available on the CD located on the inside cover of Volume 1 of the Final AEA.

ATTACHMENT 3
PAGE 1 OF 11

CYBERHAKE

The REGULATORY GMED Manual requires analysis of source, path and site.

Simple method Maps included SPPV is not appropriate as Thrust faults are not included
SP117A 2008 prohibits the use of the SPPV (Simple) method "near fault due to directivity and other near fault effects.

CGS MAP SAYS
We have NOT included ALL ACTIVE FAULT SOURCES...
IN ADDITION, the BLIND THRUST FAULTS WERE EXCLUDED IN THIS UBC APPLICATION

"These maps (the UBC Map book) were developed to ASSIST the engineering community in determining the near-source seismic factors that are applied within UBC seismic zone 4"

**Thrust faults are CBC Class "B" and must be considered for "near fault" effects
Thrust faults are required to be considered by 1998 CBC as shown in the footnote to CBC-98 Table 16 (see California Geology March/April 1998)**

1997 UBC ADDED NEAR FIELD SEISMIC FACTORS
1998 CBC Section 1629.4.2 and Tables 16-S and 16-T
CBC Section 1629, Criteria Selection, requires Near-Source Factors for Seismic Source Type A to be applied to the design of structures
The ICC-CBC 98 near fault map is "NOT REGULATORY" Thrust faults are CBC Class "B" and must be considered for "near fault" effects

County and City codes are permitted to be more stringent than Title 24,
but are not allowed to be less stringent than Title 24
see: LA County Building Codes and the LA County Regional Code Update Program (LACRUP)

For the purposes of describing the size of the design (or scenario) earthquake of a particular fault segment, moment magnitude (M_w) of the characteristic earthquake for that segment has replaced the concept of a maximum credible earthquake (MCE is ambiguous) of a particular Richter magnitude.
This has become necessary because the Richter Scale "saturates" at the higher magnitudes; that is, the Richter scale has difficulty differentiating the size of earthquakes above magnitude 7.5.

The M_w -scale is proportional to the area of the fault surface that has slipped, and thus, is directly related to the length of the fault segment. Although the numbers appear lower than the traditional Richter magnitudes, they convey more precise (and more usable) information to geologic and structural engineers. See: http://www.lbkarp.com/jellys/Jelly's_LR1a.pdf Page 7 for an excellent discussion ca. 1999

County of Los Angeles Building Code Sections 110.2 (Geotechnical Hazards), 111 (Engineering Geology and Soils Engineering Reports), 112 (Earthquake Fault Zone Maps), 113 (Earthquake Faults), and Appendix J (Excavation and Grading). Now Chapter 33

Field, E.H., J.G. Anderson, T.L. Henyey, D.D. Jackson, W.B. Joyner, Y. Lee, H. Magistrale, B. Minster, K.B. Olsen, M.D. Petersen, J.H. Steidl, L.A. Wald, and C.J. Wills (2000).

Response No. 029-10:

CDFW acknowledges the attachment titled, "CyberShake." Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required. Nonetheless, for information purposes, the following response is provided.

The discussion in "CyberShake" contains references to seismic hazard assessment tools, including use of the tool. The comment provides an example of general findings from the models CyberShake and TerraShake. The comment discusses limitations to these methods, and provides internet links to studies that seek to improve our ability to characterize seismic risk. The comment notes that some of these approaches may be adopted by municipalities and regulatory agencies in the future. The comment stresses that buildings designed and constructed within the project boundary must be built according to current standards for seismic analysis and design.

The Draft AEA does not specify any building or foundation designs for development within the project. These will be provided by the County at the building permit stages – consistent with all applicable regulatory requirements. As with all areas in Southern California, development will be subject to seismic hazards associated with local and regional fault systems. As such, site uses will be subject to the then current building codes addressing seismic hazards enforced by the County at the time the designs and supporting analyses are presented for review.

The 2010 Final EIR described in detail the faults in the vicinity of the site, including the Holser Fault, Del Valle Fault, Santa Susana, Northridge (East Oakridge), Sierra Madre (San Fernando) reverse/thrust faults, and the San Andreas Fault system. It also thoroughly described the three common types of geologic hazards that may be produced during a seismic event (e.g., earthquake): ground rupture, ground motion, and ground failure.

The 2010 Final EIR also incorporated numerous mitigation measures related to geotechnical issues, including seismic issues, liquefaction, landslides, compaction, and required design standards. These measures specify performance criteria and building design standards that future building design and construction must meet, including requirements for third party and independent review. Implementation of the mitigation measures will ensure compliance with all regulatory and geology-related requirements. Additionally, as required by applicable adopted regulatory measures, final designs and design review must follow the building standards current at the building permit stage of the regulatory process.

Comment No. 029-11:

Provided below is the first page of Attachment 4 to Letter No. 029. A full copy of the attachment is available on the CD located on the inside cover of Volume 1 of the Final AEA.

ATTACHMENT 4
PAGE 1 OF 14

Newhall Bibliography

REVIEWS

These two must be used with SP-117A 2008 and the County GMED MANUAL and standards of professional practice

Guidelines for Reviewing Geologic Reports

California Geological Survey Note 41 – General Guidelines for Reviewing Geologic Reports, 1998.
www.conservation.ca.gov/cgs/information/publications/cgs_notes/note-41/
http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_41

Guidelines for Preparing Geological Reports for Regional-Scale Environmental and Resource Management Planning CALIFORNIA DEPARTMENT OF CONSERVATION | CALIFORNIA GEOLOGICAL SURVEY NOTE 52 JANUARY 2013
http://www.conservation.ca.gov/cgs/information/publications/cgs_notes/note_52/Documents/note_52.pdf

California Board for Professional Engineers, Land Surveyors, and Geologists:
Geologic Guidelines for Earthquake and/or Fault Hazard Reports, July 1998.

California Board for Professional Engineers, Land Surveyors, and Geologists:
Guidelines for Geophysical Reports for Engineering Geology, July 1998.

California Board for Professional Engineers, Land Surveyors, and Geologists:
Guidelines for Groundwater Investigation Reports, July 1998.

California Board for Professional Engineers, Land Surveyors, and Geologists, Department of Consumer Affairs, Geologists and Geophysicists Act (Business and Professions Code, §§ 7800-7887, Chapter 12.5) with Rules and Regulations (California Code of Regulations, Title 16, Division 29, §§ 3000-3067) and Related Sections of the Business and Professions Code, Government Code, Penal Code and Evidence Code, January 1, 2013.

Overview of 2013 CBC and CGS Note 48 for 2005 CBC
http://www.aegsc.org/chapters/inlandempire/shortcourses/2014/AEG-IE%20Short%20Course_2014-06-31_Thornburg.pdf

Citations specific to 2013 CBC and ASCE 7-10. must be updated to 2016 CBC and we recommend ASCE 7-16 and FEMA -NEHRP 2015

/ApX_4_13bDraftSewardGeotechReport(2007).pdf

PRELIMINARY GEOLOGIC AND GEOTECHNICAL REPORT Updated EIR Review for Subject Portions of Newhall Ranch Mission Village, Landmark Village, Homestead and WRP Site Newhall Ranch, Los Angeles County, California
The Newhall Land and Farming Company Job No: 07-1155UE (1) October 31, 2007
nice report but no Sec 111 certification and it does not appear that they reference LACODPW MANUAL it needs to be easier to find FINAL reports and their Reviews

“Geologic hazards that may be produced by a seismic event (earthquake) include Ground Rupture, Ground Motion, and Ground Failure “

Response No. 029-11:

CDFW acknowledges the attachment titled, “Newhall Bibliography.” Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required. Nonetheless, for information purposes, the following response is provided.

The “Newhall Bibliography” document contains links to internet sources and other literature references related to seismic hazard assessment and building design to address this hazard. Annotation is also provided for some of the references that indicate that buildings designed and constructed within the project boundary must be built according to applicable and current standards for seismic analysis and design, as acknowledged by CDFW. See **Response No. 029-8** for additional information.

Comment No. 029-12:

Provided below is the first page of Attachment 5 to Letter No. 029. A full copy of the attachment is available on the CD located on the inside cover of Volume 1 of the Final AEA.

ATTACHMENT 5
PAGE 1 OF 108



INVESTIGATION OF AN IDENTIFIED SHORT-COMING IN THE
SEISMIC DESIGN PROCEDURES OF ASCE 7-10 AND DEVELOPMENT
OF RECOMMENDED IMPROVEMENTS FOR ASCE 7-16

Prepared for:
Building Seismic Safety Council
National Institute of Building Sciences
Washington, D.C.

Prepared by:
Kircher & Associates
Consulting Engineers
Palo Alto, California

March 15, 2015

Response No. 029-12:

CDFW acknowledges the attachment titled, “Investigation of an Identified Short-Coming in the Seismic Design Procedures of ASCE 7-10 and Development of Recommended Improvements for ASCE 7-16,” dated March 15, 2015. Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures

addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required. Nonetheless, for information purposes, the following response is provided.

The referenced report provided summarizes a study undertaken with the following objectives:

- (1) to investigate an identified short-coming with ELF and MSRA seismic design procedures of ASCE 7 related to the use of only two response periods (0.2 s and 1.0 s) to define seismic design forces; and
- (2) to develop a technical basis and recommendations for improving the seismic design requirements of the 2015 NEHRP Provisions and ASCE 7-16 to minimize this short-coming.

The report states that recommendations developed during the course of the work were used by the Provisions Update Committee (PUC) of the Building Seismic Safety Council to develop and adopt code changes for the 2015 National Earthquake Hazards Reduction Program (NEHRP) Provisions, and, subsequently, by the Seismic Subcommittee (SSC) of American Society of Civil Engineers (ASCE) 7 Standards Committee to incorporate these changes into ASCE 7-16.

As stated, the Draft AEA does not specify any building or foundation designs for development within the Project. These will be provided by the County at the building permit stages – consistent with all applicable regulatory requirements. As with all areas in Southern California, development will be subject to seismic hazards associated with local and regional fault systems. As such, site uses will be subject to the then current building codes addressing seismic hazards enforced by the County at the time the designs and supporting analyses are presented for review.

The 2010 Final EIR described in detail the faults in the vicinity of the site, including the Holser Fault, Del Valle Fault, Santa Susana, Northridge (East Oakridge), Sierra Madre (San Fernando) reverse/thrust faults, and the San Andreas Fault system. It also thoroughly described the three common types of geologic hazards that may be produced during a seismic event (earthquake): ground rupture, ground motion, and ground failure.

The 2010 Final EIR also incorporated numerous mitigation measures related to geotechnical issues, including seismic issues, liquefaction, landslides, compaction, and required design standards. These measures specify performance criteria and building design standards that future building design and construction must meet, including requirements for third party and independent review. Implementation of the mitigation measures will ensure compliance with all regulatory and geology-related requirements. Additionally, as required by applicable adopted regulatory measures, final designs and design review must follow the building standards current at the building permit stage of the regulatory process.

Comment No. 029-13:

Provided below is the first page of Attachment 6 to Letter No. 029. A full copy of the attachment is available on the CD located on the inside cover of Volume 1 of the Final AEA.

ATTACHMENT 6
PAGE 1 OF 327

The Resources Agency
Michael Chrisman, Secretary for Resources

California Geological Survey
Dr. John G. Parrish, State Geologist

Engineering Geology and Seismology for Public Schools and Hospitals in California

to accompany California Geological Survey Note 48 Checklist

by Robert H. Sydnor, *Senior Engineering Geologist*
California Geological Survey

www.conservation.ca.gov/cgs

July 1, 2005

316 pages

Response No. 029-13:

CDFW acknowledges the attachment titled, "Engineering Geology and Seismology for Public Schools and Hospitals in California," by Robert H. Sydnor, dated July 1, 2005. Please refer to **Response to Comment No. 029-3** for further responsive information as to both the scope of the Draft AEA and the prior analysis of geology and geologic hazards in the 2010 Final EIR. As stated, the project must adhere to all applicable laws and regulations with regard to geologic hazards prior to construction. In addition, the project must implement already adopted mitigation measures addressing such hazards. The above comment does not raise any environmental issue with regard to the adequacy of the Draft AEA; thus, no further response is required. Nonetheless, for information purposes, the following response is provided.

The referenced report discusses methods of seismic assessment and building design related to schools and hospitals. However, in referring to this report, the other referenced attachment titled, "Newhall Bibliography," states that "Dr. Sydnor's CGS Monograph" (i.e., the referenced report) "is dated prior to the change from the 1998 UBC to the CBC and uses the old version of his CGS Note 48 [but] it is still very useful." The report has been generally reviewed, but it is not specific to the project, nor does it raise any specific issue concerning the adequacy of the environmental analysis provided in the Draft AEA.

In addition, as stated above, the Draft AEA does not specify any building or foundation designs for development within the project. These will be provided by the County at the building permit stages — consistent with all applicable regulatory requirements. As with all areas in Southern California, development will be subject to seismic hazards associated with local and regional fault systems. As such, site uses will be subject to the then current building codes addressing seismic hazards enforced by the County at the time the designs and supporting analyses are presented for review.

The 2010 Final EIR described in detail the faults in the vicinity of the site, including the Holser Fault, Del Valle Fault, Santa Susana, Northridge (East Oakridge), Sierra Madre (San Fernando) reverse/thrust faults, and the San Andreas Fault system. It also thoroughly described the three common types of geologic hazards

that may be produced during a seismic event (e.g., earthquake): ground rupture, ground motion, and ground failure.

The 2010 Final EIR also incorporated numerous mitigation measures related to geotechnical issues, including seismic issues, liquefaction, landslides, compaction, and required design standards. These measures specify performance criteria and building design standards that future building design and construction must meet, including requirements for third party and independent review. Implementation of the mitigation measures will ensure compliance with all regulatory and geology-related requirements. Additionally, as required by applicable adopted regulatory measures, final designs and design review must follow the building standards current at the building permit stage of the regulatory process.

030. Letter from Darrell Clarke, Sierra Club, dated February 13, 2017

Comment No. 030-1:

Please find the attached additional Sierra Club comments on the Newhall Ranch Landmark Village and Mission Village Recirculated Portions of the EIR documents.

Response No. 030-1:

The comment is an introduction to comments that follow. No further response is required. That being said, as a prefatory matter, it is noted that the commenter attached comment letters submitted on the County of Los Angeles' environmental analysis for the Landmark Village and Mission Village projects, not the Draft AEA for the RMDP/SCP project. For purposes of these responses, the subject comments conservatively will be interpreted as applying to the AEA, even though the commenter has not conducted a project-specific evaluation of the environmental documentation in this respect.

Comment No. 030-2:

Sierra Club comments on Newhall Ranch Landmark Village EIR Recirculated Portions

I would like to submit the following transportation-related comments in addition to other Sierra Club comments submitted on this project.

Response No. 030-2:

The comment is an introduction to comments that follow. No further response is required. Please also see **Response to Comment No. 030-1** above for additional relevant information.

Comment No. 030-3:

Table 2.1-3 Summary (page 2.1-30) and LV 4.23-4/2-4 (page 2.1-43) – Only one single-port EV charging station per residence is inadequate, especially in light of the California Air Resources Board's direction toward an all-electric vehicle fleet and the evolution of EVs toward longer range. The requirement should be *one charger per residential parking space*.

Response No. 030-3:

The comment recommends that Mitigation Measure 2-4 be revised to require ZEV charging equipment for every residential parking space on the project site, in lieu of the measure's current requirement to provide one ZEV charging station per residence. The comment suggests that this recommendation is necessitated by ARB's pursuit of turnover in the light-duty and passenger vehicle fleet in favor of ZEVs.

The Draft AEA illustrates how Mitigation Measure 2-4 will increase the number of ZEVs operated by project residents. Notably, Draft AEA Appendix 1 and Appendix H therein include an extensive evaluation regarding how the commitment to provide one ZEV charger for each residence and a \$1,000 ZEV purchase subsidy to 50 percent of the residences will lead to the purchase of ZEVs. The efficacy of this measure has been verified by the ARB, which recently identified the project as an example of a sustainable land use development project that has "demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions" (see page 136 of the Draft 2017 Climate Change Scoping Plan Update).

It also should be noted that the project would not impair the ability of project residents to own and/or operate more than one ZEV. Such a potentiality would be supported by the project's "beachhead" community status, which is attributable, in part, to its proposed deployment of extensive on-site and off-site EV charging equipment, as well as the multi-faceted implementation of regulations, programs and policies from state, regional and local agencies to facilitate turnover in California's light-duty and passenger vehicle fleet. (See **Topical Response 3: Zero Emission Vehicles at Newhall Ranch.**)

Comment No. 030-4:

LV 4.23-6/2-6 (page 2.1-44) – Where is the process to measure the effectiveness of the TDM plan’s actual VMT reduction and take actions if the target is not met (the Monitoring Action on page 2.3-34+ is mostly about NEVs)?.

Response No. 030-4:

The comment inquires as to the process that will be used to measure the effectiveness of the Newhall Ranch TDM Plan, the implementation of which is required by Mitigation Measure 2-6. In response, the project’s TDM Plan, which was authored by an expert transportation engineering firm (UrbanTrans), identifies those strategies that will be implemented to reduce VMT, as well as timeline and phasing requirements, monitoring standards, and performance metrics and targets tailored to each of the strategies. In accordance with the TDM Plan, a non-profit TMO or equivalent management entity shall be established to provide the services required, as applicable.

Appendix E to Draft AEA Appendix 1 contains the TDM Plan, and Section 4.0: Program Monitoring and Table 1: RMDP/SCP TDM Plan Performance Metrics and Targets therein contain information that is particularly responsive to this comment. As explained in the TDM Plan, data collection mechanisms that will be used to ensure the effectiveness of the VMT-reducing strategies include field verification, resident surveys, TMO reports, and employer reports/surveys. Relatedly, the TMO or equivalent entity is required to periodically evaluate the parameters of the VMT-reduction strategies to ensure that the strategies are meeting the needs and priorities of the project’s residents, employees, tenants and visitors while concurrently serving to reduce VMT. These actions and requirements will ensure that the TDM Plan is effective. Please also see the project’s MMRP, a copy of which is included in Final AEA Appendix 2.

Comment No. 030-5:

More fundamentally, there is nothing about how well the development’s urban form inherently does or does not encourage VMT reduction via walkability, bicycle facilities, well-located services, and useful transit.

Response No. 030-5:

The comment states that the AEA does not address how well the project’s “urban form” encourages or discourages VMT reduction via amenities for pedestrians and bicyclists, the location of services, and transit. However, the comment is mistaken as Appendix E to Draft AEA Appendix 1 includes an extensive evaluation and discussion of these very issues. Specifically, Appendix E contains a technical memorandum, authored by Fehr & Peers (an expert transportation engineering firm), that evaluates the effectiveness of the Project’s TDM Plan primarily by reference to the CAPCOA’s published guidance, Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures.

The project is a comprehensive master-planned community that will provide a broad range of land uses to serve residents, including schools, office and retail space and entertainment, which will eliminate the need for many residents to travel off site (see Draft AEA Table 1.2-1). Specific to the comment, the following strategies studied in the Fehr & Peers technical memorandum and contained in the project’s TDM Plan address the areas of interest to the commenter:

2. Pedestrian Network
3. Traffic Calming
4. Transit Network Expansion
6. Required Commute Trip Reduction Program
9. Transit Fare Subsidy for Employees
12. Mobility Hubs
13. Tech-Enabled Mobility
14. Bike Share Program
15. Transit Fare Subsidy for Below Market Rate Housing Residents

Comment No. O30-6:

LV 4.23-9/2-9 (page 2.1-45) – Not only is \$100,000 insufficient to fund the additional cost of a new electric transit bus over a CNG bus, the appropriate amount *should entirely fund the capital and operating costs for all additional transit service to serve the new development.*

Response No. O30-6:

The comment recommends that Mitigation Measure 2-9 be revised to require the project to entirely fund the capital and operating costs of the subject electric transit buses. However, the requirement established in Mitigation Measure 2-9 was delineated to complement the existing subsidy and incentive funding from public agencies that encourage the adoption of zero emissions technology in the medium- and heavy-duty vehicle fleet. Examples of such funding include, but are not limited to, ARB's Hybrid Truck and Bus Voucher Incentive Program and Zero-Emission Bus and Truck Pilot Program, Caltrans's Low Carbon Transit Operations Program and Transit & Intercity Rail Capital Program, and the California Energy Commission's Medium- and Heavy-Duty Vehicle Technology Demonstration. Full funding of the electric transit bus is not required since the barrier to electric bus adoption is not the full cost of the transit bus but the incremental costs and benefits.

It also should be noted that CARB reviewed the emissions inventory for the project and determined that the AEA "provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." CARB also has identified this project as a recent example of a sustainable land use development project that has "demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions" (see page 136 of the Draft 2017 Climate Change Scoping Plan Update). Thus, the AEA's parameters for Mitigation Measure 2-9 are reasonable and adequate.

Comment No. O30-7:

Sierra Club comments on Newhall Ranch Mission Village EIR Recirculated Portions

I would like to submit the following transportation-related comments in addition to other Sierra Club comments submitted on this project.

Response No. O30-7:

Please see **Response to Comment No. O30-2** above, as this comment repeats statements made therein.

Comment No. O30-8:

Table 2.1-3 Summary (page 2.1-29) and MV 4.23-4/2-4 (page 2.1-41) – Only one single-port EV charging station per residence is inadequate, especially in light of the California Air Resources Board's direction toward an all-electric vehicle fleet and the evolution of EVs toward longer range. The requirement should be *one charger per residential parking space.*

Response No. O30-8:

Please see **Response to Comment No. O30-3** above, as this comment repeats statements made therein.

Comment No. O30-9:

MV 4.23-6/2-6 (page 2.1-42) – Where is the process to measure the effectiveness of the TDM plan's actual VMT reduction and take actions if the target is not met (the Monitoring Action on page 2.3-34+ is mostly about NEVs)?

Response No. O30-9:

Please see **Response to Comment No. O30-4** above, as this comment repeats statements made therein.

Comment No. 030-10:

More fundamentally, there is nothing about how well the development's urban form inherently does or does not encourage VMT reduction via walkability, bicycle facilities, well-located services, and useful transit.

Response No. 030-10:

Please see **Response to Comment No. 030-5** above, as this comment repeats statements made therein.

Comment No. 030-11:

MV 4.23-9/2-9 (page 2.1-44) – Not only is \$100,000 insufficient to fund the additional cost of a new electric transit bus over a CNG bus, the appropriate amount *should entirely fund the capital and operating costs for all additional transit service to serve the new development.*

Response No. 030-11:

Please see **Response to Comment No. 030-6** above, as this comment repeats statements made therein.

031. Letter from Spirit Property, dated February 3, 2017

Comment No. 031-1:

On behalf of Larry Rasmussen, please find letter of support for Newhall Ranch attached.

Response No. 031-1:

The comment introduces the attached comment letter, which is addressed in **Comment No. 031-3** and its corresponding response. The comment also expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 031-2:

Please don't hesitate to contact our offices should you have any questions or concerns.

Response No. 031-2:

The comment indicates that the commenter can be contacted if there are any questions or concerns. CDFW has reviewed the letter and based on its content does not have any question or concerns regarding the information provided in the letter. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 031-3:

I am in full and complete support of FivePoint's efforts to supply much needed housing and jobs to Los Angeles County with their proposed Newhall Ranch project.

Newhall Land (now FivePoint) has a stellar track record of building successful planned- communities such as Valencia, one of the greatest land developments in Southern California. Now, several decades later, FivePoint continues to bring innovation to our community with their new Net Zero building initiative where they are taking great strides to support California's leadership against global climate change.

As a longstanding business owner and resident of the community, with many years of land development experience, I truly believe this will be a great project for our community and SCV business in general. This project will help keep the Los Angeles County economic engine working; without proper housing, business cultivation and job creation - it will inevitably stall.

Newhall Ranch is an innovative multi-billion-dollar economic investment for the Santa Clarita Valley, with its creation of approximately 60,000 permanent jobs and hundreds of millions of dollars in tax revenue.

I look forward to seeing Newhall Ranch - with its high-quality schools, recreation facilities, protected open space, and job centers - come to life!

Response No. 031-3:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the commitment being made to achieve net zero GHG emissions through the Net Zero Newhall proposal and its programs, the provision of housing including affordable housing, employment generation, and additional tax revenue resulting from the development associated with the project. The comment also expresses support for the development of schools, recreational facilities, and the preservation of open space. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

032. Letter from Spirit Properties, dated February 3, 2017

Comment No. 032-1:

On behalf of Peggy Rasmussen, please find letter of support for Newhall Ranch attached.

Response No. 032-1:

The comment introduces the attached comment letter, which is addressed in **Comment No. 032-3** and its corresponding response. The comment also expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 032-2:

Please don't hesitate to contact our offices should you have any questions or concerns.

Response No. 032-2:

The comment indicates that the commenter can be contacted if there are any questions or concerns. CDFW has reviewed the letter and based on its content does not have any question or concerns regarding the information provided in the letter. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 032-3:

This letter is being sent to you in support of FivePoint's proposed Newhall Ranch project.

FivePoint (formerly Newhall Land & Farming) has a wonderful track record in building successful planned-communities such as Valencia - one of the greatest land developments in Southern California. Once again, FivePoint is poised and ready to 'deliver as promised': a new-state-of-the-art, innovative, environmentally responsible, sustainable and beautiful community to be loved and adored for generations to come.

I have personally been associated with Newhall Land for several years. Throughout the years, I have continually been impressed by their cautious and preventative approach to every project they take on. I am encouraged to see, once again, such responsible efforts in their new Net Zero building initiative which truly sets a new standard of sustainability. Their care and concern for the community and environmental stewardship is undoubtedly something to admire.

I genuinely believe that Newhall Ranch will be a wonderful addition to our community and I cannot wait to see it come to fruition!

Response No. 032-3:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs to achieve net zero GHG emissions. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

033. Letter from Valencia Acura, dated January 26, 2017

Comment No. 033-1:

Valencia Acura is sending this letter in support of the Net Zero Newhall initiative, which would make Landmark Village, Mission Village and the overall Newhall Ranch community, a precedent-setting project in California and the nation. We applaud Newhall Ranch for committing to provide an electric vehicle charging station within every home, and thousands more throughout the region. What a great option for those who have and will purchase our new Acura RLX Sport Hybrid to be able to look to the future of a community with that type of innovative thinking.

As a local business with employees that not only work, but live in this area, we welcome a place of this quality and sustainable environmental innovation. Combined with the preservation of 10,000 acres of open space, the complete Newhall Ranch community will result in a coveted lifestyle for residents. In addition, Newhall Ranch will provide much needed job growth to our region as well as critically needed new housing.

As forward -thinking business and civic leaders, our mission is clear: we must constantly innovate to find ways to pursue smart growth in environmentally sustainable ways and protect quality local jobs that will best position us to compete in the 21st century economy.

We fully support Newhall Ranch and its first two communities, Landmark Village and Mission Village.

Response No. 033-1:

The comment expresses support of the Landmark Village and Mission Village projects, which are located within the RMDP/SCP project area. The comment also expresses specific support for the Net Zero Newhall proposal and its programs, the preservation of open space, as well as the job growth and new housing resulting from the development associated with the project. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

034. Letter from Valley Industry & Commerce Association, dated January 27, 2017

Comment No. 034-1:

The Valley Industry and Commerce Association (VICA) strongly supports Newhall Ranch. Attached to this email you will find VICA's comments on the Newhall Ranch Draft AEA.

Response No. 034-1:

The comment introduces the attached comment letter, which is addressed in **Comment No. 034-2** and its corresponding response. The comment also expresses support for the development proposed for the Newhall Ranch Specific Plan site, which is located within the RMDP/SCP project area. The comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.

Comment No. 034-2:

The Valley Industry and Commerce Association (VICA) supports Landmark Village, Mission Village and the entire plan for Newhall Ranch, which would represent a precedent-setting project in California and the nation. The Net Zero Newhall initiative would make Newhall Ranch a carbon neutral community, reducing or mitigating its net climate change-causing greenhouse gas emissions to zero and preserving 10,000 acres of open space while also breeding business and creating a coveted lifestyle for residents.

Net Zero Newhall's project incentives include offering subsidies for homeowners to purchase electric cars, installing electric car charging stations in every garage and using solar power to generate energy in homes and businesses. In addition to these on-site programs, FivePoint is making investments in programs to reduce greenhouse gas emissions elsewhere in LA County, in California and the world. Investments such as these will help position the Santa Clarita Valley for future investment in high-growth green technology industries and put the area on the map as an innovator in sustainability and modern-day development.

As forward-thinking business and civic leaders, our mission is clear: we must constantly innovate to find ways to pursue smart growth in environmentally sustainable ways and protect quality local jobs that will best position us to compete in the 21st century economy. Newhall Ranch proves that economic development and progressive climate change policies can coexist and VICA is proud to support such sustainability, ingenuity and innovation.

Response No. 034-2:

The comment expresses support for the development proposed for the Newhall Ranch Specific Plan site, including the Landmark Village and Mission Village projects, which is located within the RMDP/SCP project area. This comment expresses specific support for the Net Zero Newhall proposal and its programs, the preservation of open space, and the economic development resulting from the development associated with the project. This comment is noted for the record and is included in this Final AEA for review and consideration by the decision-makers.