



JAN DE LEEUW
11667 STEINHOFF ROAD
FRAZIER PARK CA 93225
661.245.1725
DELEEUW@FRAZMTN.COM
WWW.CUDDYVALLEY.ORG

Cheryl Casdorff
Kern County Planning Department
2700 "M" Street, Suite 100
Bakersfield, CA 93301

Date 10/28/05

Dear Cheryl Casdorff,

Below are some additional issues I would like to put on the record and see addressed in the DEIR for Tejon Mountain Village (TMV).

Cumulative Impacts

1. In addition to the 3,000 houses in TMV, there will be 23,000 houses in Centennial, less than 10 miles away.
2. On the other side of the freeway, near Frazier Park High School, an additional 800 houses have been proposed in the Falling Star project.
3. Poe Development is planning to reactivate it's San Emigdio New Town project, with up to 20,000 houses.
4. There are persistent rumors (and approved specific plans) for TRC to build additional communities on the north side of the Tehachapi mountains.

5. The triangle between the CA 138, the I-5, and Gorman Post Road has been bought by an investor who presumably has development plans.
6. The Martin Brothers plan to build up to 150 houses in Gorman.
7. If we add this all up, and it all comes to pass, then it means that the Mountain Communities (from the Grapevine to PMC to Gorman to Neenach) will grow by a factor of at least 20 in the next 25 years. Growth of this order of magnitude, which will put up to 150,000 people in a rural, biologically, and environmentally sensitive area, will be destructive. It seems appropriate that in the DEIR the lead agency takes this worst case scenario into account, and calculates the impact it will have on water use, traffic, air, and biological and cultural resources.

Castac Lake

1. We now know TRC did not request a name change from the U.S. Board on Geographic Names. Because of the historical and cultural importance of the lake, and its current name, we hope such a name change is not part of the plans.
2. It would be incumbent on the lead agency to establish what work has been done to fill the lake and to keep it at its current level. As you know, permits are needed for holding runoff from upstream water courses and using water from streambed aquifers. If more than one acre of soil was disturbed, an NPDES Storm Water Permit for Discharges Associated with Construction Activity was needed. If the lake is a water of the U.S., then a 404 permit from the Army Corps of Engineers is needed to fill it, and as well as a 401 Water Quality Certification from WRCB. Similar, if the lake discharges to waters of the U.S.

3. Releasing non-native fish into the lake, as well as influencing the surrounding wetlands, may require additional permits from CAFG and USFWS.
4. There are strong indications that filling the lake has modified downstream hydrology, and that these modifications make the I-5 more susceptible to flooding. It is unclear to me if there are permits which permit dangerous flooding of interstate freeways, but it seems obvious that this impact must be mitigated.

Sincerely,

Jan de Leeuw

Director, Cuddy Valley Statistical Consulting

Distinguished Professor and Chair, UCLA Department of Statistics