

Comment Letter No. 01

Wildlife Newhall Ranch

From: Fred Sutton <fred@aagla.org>
Sent: Monday, February 13, 2017 9:02 AM
To: Wildlife Newhall Ranch
Subject: Newhall Ranch Comments
Attachments: Newhall Ranch.pdf

Hello Ms. Courtney,

Attached, please find our letter regarding the Newhall Ranch EIR to be included in the record.



Kind regards,

**Frederick Sutton**

Government Affairs Manager
AAGLA, 621 S. Westmoreland Ave. Los Angeles, CA 90005
t: 213/384-4131 ext 309 | f: 213/382-3970

www.AAGLA.org
[Twitter](#)
[Facebook](#)

Comment Letter No. 01

The Voice of Multifamily Housing Since 1917©



Ms. Betty Courtney
Environmental Program Manager I, South Coast Region
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

Re: Newhall Ranch - Comments on Newhall Ranch Draft AEA

Dear Ms. Courtney,

I am writing on behalf of the Apartment Association of Greater Los Angeles to give our support to the Newhall Ranch project. Not only is it environmentally friendly, as it will result in **no net emissions** of greenhouse gases from the development or operation of the master-planned community, it is also fulfill a desperate need for supply to the housing market.

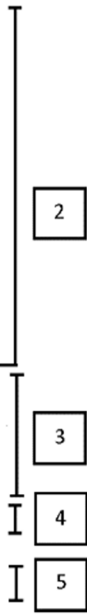
According to a recent study done by Next10, "from 2005 to 2015, permits for only 21.5 housing units were filed for every new 100 residents in California, less than any other state except Alaska." There is not enough housing in California to meet the demand, plain and simple. Additionally, this community will spur the development of some 60,000 jobs which are sorely needed.

The only way we can reduce the housing crisis in the state is by supporting good, smart and sustainable development. This project passes the test with flying colors and is a no brainer. As you may know, the Apartment Association of Greater Los Angeles (AAGLA) is an organization that provides industry leadership and member services to over 20,000 rental property owners and managers throughout the L.A. basin. Our members provide affordable housing for hundreds of thousands of residents in Southern California and represents over \$50 billion in property assets. We strongly support this project to help bring economic, environmental and housing relief.

Please do not hesitate to call me with any questions.

Kind regards,

Frederick Sutton
Director of Government Affairs
Apartment Association Greater Los Angeles
213.384.4131 ext 309



Comment Letter No. O2

Courtney, Betty@Wildlife

From: Jonathan Baskin <jnbaskin@yahoo.com>
Sent: Monday, February 13, 2017 8:26 PM
To: Wildlife Newhall Ranch
Subject: Comments on Newhall Ranch Draft AEA
Attachments: Comments on Draft AEA 2017.docx

Betty - Can you send me a reply so I know that you got this. Thanks, Jonathan

1

Jonathan N. Baskin 560 So. Greenwood Ave. San Marino, CA 91108-1270 mob (626) 826-8226



Comment Letter No. O2

Biological Sciences

3801 West Temple Avenue
Pomona, California 91768-4032
14 March 2017

Telephone: (626) 826-8226
Fax : (909) 869-4078
Email: jnbaskin@pacbell.net

California Department of Fish and Wildlife
Comments on Newhall Ranch Draft AEA
c/o Betty Courtney
3883 Ruffin Road
San Diego, CA 92123

Dear Ms. Courtney

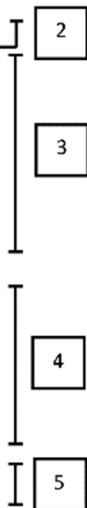
I have examined the Draft AEA and have only two important comment. One is that the un-armored threespine stickleback, *Gasterosteus aculeatus williamsoni*, a state and federal Endangered Species, cannot survive long term in concrete or rip-warp lined stream channels. This is the case because during a high flow events, such as we are now experiencing, or any bank to bank flows, the fish will have no place of refuge and be washed out of the system. Thus the Santa Clara River in the area of this development described in the Draft AEA will not be able to support this Endangered fish.

My other comment is that the Draft AEA states that stickleback will be captured and relocated to avoid harming them. During the fish's breeding season, which can go on from Spring till early Fall, there is the potential for numerous of newly hatched young to be present. They are extremely sensitive to handling, especially during hot weather, so cannot be netted and captured without significant mortality.

Thank you for allowing me to comment on this document.

Sincerely,

Jonathan N. Baskin, Ph.D
Emeritus Professor
Biological Sciences



Agriculture w Arts w Business Administration w Engineering w Environmental Design w Science

Comment Letter No. 03**Courtney, Betty@Wildlife**

From: Steve Schuyler <sschuyler@biasc.org>
Sent: Friday, February 10, 2017 5:28 PM
To: Wildlife Newhall Ranch
Subject: Net Zero Newhall Comments
Attachments: Newhall Support Final 2.10.pdf

Ms. Courtney, please accept these prepared comments regarding the Net Zero Newhall Project.

I

1

Steven S. Schuyler
Executive Vice President, Government Affairs
Building Industry Association of Southern California
24 Executive Park Suite 100
Irvine, CA 92614

(949) 553-9500 #848 Office
(949) 296 3499

sschuyler@Biasc.org

www.Biasc.org



Building Industry Association of Southern California, Inc.

February 10, 2017

Ms. Betty Courtney
Environmental Program Manager I, South Coast Region
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

RE: Comments on Newhall Ranch Draft AEA

Dear Ms. Courtney:

On behalf of the Building Industry Association of Southern California, BIASC Inc., I am writing to express our support for the tremendous effort that FivePoint has put into the Net Zero Newhall project in achieving a Zero Net Energy master planned community at Newhall Ranch.

2

BIASC is a regional trade association that represents more than 1,100 member companies within a six-county region and is comprised of Chapters in Orange, Los Angeles/Ventura, Riverside/Imperial and San Bernardino counties. Together, BIASC's members build most of the new home communities throughout the same six-county region.

3

According to the Southern California Association of Governments, as documented in the adopted 2016 Regional Transportation Plan and Sustainable Communities Strategy RTP/SCS, Southern California's population is expected to grow from 39M to 50M by 2050. Today, our region is already faced with an extreme shortfall of housing for our current population. Indeed, the recent Statewide Housing Assessment released by the State of California Department of Housing & Community Development indicates that we are short by over 100,00 units annually, with 180,000 per year needed between 2015-2025 to meet current minimum demand.

4

One third of renters in the State are paying more than 50% of their income toward housing costs and overall ownership levels are at the lowest since the 1940's. The Assessment goes on to indicate that the housing shortage results in a negative economic impact of \$238 billion, reducing our GDP by 6%. These facts not only hurt the business community and overall employment in the Region, they generate significant consequences in terms of public health, poverty rates, and long distance commutes for people to find attainable housing.

We provide this information as background context for consideration of the proposed Net Zero Newhall. The full community plan will create 21,500 additional homes in Los Angeles County, our State's largest population center, which is severely underserved for new housing. It will also generate over 60,000 permanent jobs in the Region.

5

Equally notable, this proposed sustainable community will create 10,000 acres of permanent open space and 50 miles of new public trails. In addition, FivePoint has voluntarily and uniquely proposed a plan that exceeds California's rigorous Title 24 and Cal Green Code requirements for energy conservation. While we applaud FivePoint's leadership in this arena, the reality is that there are construction cost impacts from

24 Executive Park, Suite 100, Irvine, California 92614
949.553.9500 | biasc.org
An Affiliate of the National Association of Home Builders and the California Building Industry Association

Baldy View
LA/Ventura
Orange County
Riverside

Comment Letter No. O3

such an ambitious sustainability plan. As an industry, we remain deeply concerned about the regulatory cost burden impact upon housing affordability in our Region.

The Net Zero Newhall project is unique due to several re-enforcing factors making it perfect for Net Zero attainment including; the existence of a single owner and it is comprised of a large swath of contiguous land uniquely situated. These unique attributes among others also makes replication of this project difficult if not impossible in other locations, simply put, one size does not fit all.

BIASC strongly supports the approval and build out of this innovative and collaborative project as an example of what can be achieved when the dynamics of market innovation and collaboration combine with appropriate project scale, allowing a project like Net Zero Newhall to come to fruition.

Respectfully,



Mike Balsamo
Chief Executive Officer
Building Industry Association of Southern California, Inc.

5

Comment Letter No. 04

Wildlife Newhall Ranch

From: De'Andre Valencia <dvalencia@bialav.org>
Sent: Monday, February 06, 2017 1:08 PM
To: Wildlife Newhall Ranch
Subject: Comments on Newhall Ranch Draft AEA
Attachments: Newhall Ranch Comment Letter.pdf

To whom it may concern,

Please see the attached letter regarding the Newhall Ranch Draft AEA.

I 1

Thank you.



Los Angeles/Ventura Chapter

De'Andre Valencia
Director of Government Affairs
Building Industry Association of Southern California
Los Angeles/Ventura Chapter
The Voice of Building and Development
350 South Bixel Street, Suite 100
Los Angeles, CA 90017
Office: 213-797-5965
Work Cell: 626-587-8656
dvalencia@bialav.org www.bialav.org

Comment Letter No. 04

CHAPTER OFFICERS

Randy Johnson, *Brookfield Residential*
BIA-LAV President

Ken Melvin, *CalAtlantic Homes*
BIA-LAV Vice President

Keith Herren, *Williams Homes*
BIA-LAV Treasurer

Kevin Harbison, *Shea Homes*
BIA-LAV Secretary

Henrik Nazarian, *David Evans & Associates, Inc.*
BIA-LAV VP of Associates

Glen Longarini, *KB Home*
BIA-LAV Immediate Past President

BOARD OF DIRECTORS

Amy Ambrose, *Landscape Development, Inc.*

Jim Bizzelle, *Habitat for Humanity of Greater LA*

George Chiang, *Synergy Alliance Advisors, Inc.*

Rocco Cordola, *Gothic Landscape*

Chris Courtney, *Richmond American Homes*

George Dickerson, *All Promotions Etc.*

Bart Doyle, *Doyle D Barton Attorney at Law*

Lenny Dunn, *Beazer Homes*

Mike Frasco, *Bio Clean Environmental Services*

Amy Freilich, *Armbruster Goldsmith & Delvac LLP*

Laurel Gillette, *KTGY Architecture + Planning, Inc.*

Peter Gutierrez, *Latham & Watkins*

Andy Henderson, *The Henderson Law Firm*

Ken Kahan, *California Landmark*

Frank Lawrence, *WCH Communities, LP*

Derek Leavitt, *Modative, Inc.*

Dave Little, *Pardee Homes*

Jim Macke, *Wells Fargo Home Mortgage*

Kathleen Magner, *Watt Communities*

Karl Mallick, *Kimley-Horn & Associates, Inc.*

Bill McReynolds, *Daniel Bernstein & Associates*

Greg Medeiros, *Tejon Ranch Company*

Eileen Merino, *CDS Insurance*

Tom Mitchell, *Newhall Land*

Matt Modrzejewski, *California Home Builders*

John Musella, *The Musella Group*

Nkechi Odu, *Chelsea Investment Corp.*

Scott Ouellette, *Williams Homes*

Many Perdue, *Oakridge Landscape, Inc.*

Ben Rocca, *Rocca Development Group*

Ryan Rosenthal, *Prospect Mortgage*

John Scull, *D.R. Horton*

Sara Soudani, *Commonwealth*

Scott Stone, *Comstock Homes*

Alyssa Trebil, *Duct Testers*

Rich Villaseñor, *KB Home*

Andy Wang, *NexData Technology*

Michelle Weedon, *Meyers Research*

Rick White, *Larrabure Framing*

Norm Witt, *Cook Hill Properties*

February 6, 2017

Ms. Betty Courtney
Environmental Program Manager I, South Coast Region
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

Re: Newhall Ranch

Dear Ms. Betty Courtney,

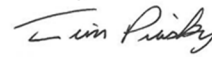
The Los Angeles-Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIA-LAV) is the voice of building and development in Los Angeles and Ventura counties. We represent the thousands of men and women and their member companies who design, plan, build, and remodel homes, condominiums, and apartments throughout our region.

Landmark Village, Mission Village and the entirety of the Newhall Ranch master planned community are significant undertakings that have the unique opportunity to help this region and provide major opportunity for our growing population. Thoughtful planning of the community's streets and infrastructure, schools, library, fire stations, etc. will create a well-balanced environment. As the planners of the Valencia master plan, FivePoint has the needed expertise and dedication to build one of the most innovative projects in history.

Most importantly, we are in a housing crisis. There is a lack of inventory here in Santa Clarita which is exhausting affordability and limiting move-up buyer opportunities. At full buildout, the Newhall Ranch communities will not only create much needed jobs but also create an array of housing types with various price points, expanding home ownership opportunities.

Lastly, the Building Industry Association of Southern California, Los Angeles/Ventura Chapter supports this project. Landmark Village, Mission Village and the entire Newhall Ranch community will provide incredible economic opportunities for the region and help even more people live the American Dream.

Sincerely,



Tim Piasky
Chief Executive Officer,
BIA-LAV

2

3

Comment Letter No. 05

Wildlife Newhall Ranch

From: Maltz, Martha <martha.maltz@calchamber.com> on behalf of Lacey, Louinda <Louinda.Lacey@calchamber.com>
Sent: Monday, February 13, 2017 2:34 PM
To: Wildlife Newhall Ranch
Subject: Comments on Newhall Ranch Draft AEA
Attachments: Comment letter re Newhall Ranch.pdf

Dear Ms. Courtney,

Attached is our comment letter regarding Newhall Ranch. If you would like to discuss these comments further, please do not hesitate to contact me. Thank you.

1

Louinda V. Lacey
Policy Advocate



California Chamber of Commerce
1215 K Street, 14th Floor
Sacramento, CA 95814

T 916 930 1260

Visit calchamber.com for the latest California business legislative news plus products and services to help you do business.
This email and any attachments may contain material that is confidential, privileged and for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient or have reason to believe you are not the intended recipient, please reply to advise the sender of the error and delete the message, attachments and all copies.

Comment Letter No. 05



February 13, 2017

Ms. Betty Courtney
Environmental Program Manager I, South Coast Region
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

VIA E-MAIL: newhallranch@wildlife.ca.gov

RE: Newhall Ranch

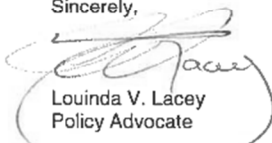
Dear Ms. Courtney:

The California Chamber of Commerce (Chamber) respectfully submits the following letter in support of approval of the Draft Additional Environmental Analysis (AEA) for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP) Final Environmental Impact Report (EIR) (SCH No. 2000011025).

While the Chamber does not express an opinion as to any specific element of the EIR, it believes the proposed project furthers California's policies and priorities relating to, among others, housing and job creation. It would supply up to 21,500 homes to meet the demands of California's residents, assisting to alleviate the State's housing crisis. It would further add more than 2,000 much needed affordable housing units to California's pipeline and is expected to create approximately 60,000 permanent jobs. In total, the proposed project will have positive economic impacts at the local and regional levels, and on California as a whole.

The Chamber urges the California Department of Fish and Wildlife to approve the AEA.

Sincerely,



Louinda V. Lacey
Policy Advocate
LVL:mm

2

1215 K Street, Suite 1400
Sacramento, CA 95814
916 444 6670
www.calchamber.com

Comment Letter No. 06

Courtney, Betty@Wildlife

From: Native Conservation <native.conservation@gmail.com>
Sent: Monday, February 13, 2017 5:05 PM
To: Wildlife Newhall Ranch
Subject: Comments on Newhall Ranch Draft AEA
Attachments: Newhall Mgmt Plans Comments - CNPS.pdf

Dear Ms Courtney,

Please find comments respectfully submitted by California Native Plant Society.

Thank you,

--
Julie Clark De Blasio
Conservation Chair
Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society

I 1

Comment Letter No. O6



CALIFORNIA
NATIVE PLANT SOCIETY

Los Angeles /Santa Monica Mountains Chapter

15811 Leadwell Street
Van Nuys, California 91406-3113

Ms. Betty Courtney
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego CA 92123

VIA EMAIL: [mailto:newhallranch@wildlife.ca.gov?subject=Comments on Newhall Ranch Draft AEA](mailto:newhallranch@wildlife.ca.gov?subject=Comments%20on%20Newhall%20Ranch%20Draft%20AEA)

February 13, 2017

RE: SCH No. 2000011025
DRAFT ADDITIONAL ENVIRONMENTAL ANALYSIS
for the
NEWHALL RANCH RESOURCE MANAGEMENT and DEVELOPMENT PLAN
and
SPINEFLOWER CONSERVATION PLAN ENVIRONMENTAL IMPACT REPORT

Dear Ms. Courtney:

The California Native Plant Society (CNPS) has reviewed the DEIR for Newhall and the Spineflower Conservation Plan EIR for *Chorizanthe parryi* ssp. *fernandina* (San Fernando Valley spineflower) and provide the following comments.

We find the both management plans to be incomplete, not employ best and most recent science, have flawed or little analyses, and serve as threats to the habitat and native plants both within the project area and entire watershed. Based on all available information, existing conditions, and proposed land management activities, we recommend the Department request both plans be more comprehensively researched for scientific acuity, longterm sustainability, and benefits to the environment at the watershed level.

I. Resource Management & Development Plan (RMDP)

A. Naturally Occuring Water Features

The development will underground and otherwise channel all existing tributaries to the Santa Clara River. 'Low Impact Development' design elements will be employed that create swales, infiltration points for

Newhall Ranch Resource Management & Development Plan; Spineflower Conservation Plan EIR
CNPS, LA/SMM Chapter. February 13, 2017, page 1

2

3

Comment Letter No. 06

above non-channeled areas, and other landscape catchments. The channelization of naturally occurring Waters on the property will decimate existing native plant habitat throughout those areas and degrade Beneficial Uses as required by California Fish & Wildlife Code and the Porter-Cologne Water Quality Act. The paucity of horticultural incorporation of locally native plants into the landscape palette for the RMDP further exacerbates the environmental costs to the site, tangential, and regional natural resources.

3

Proposed ‘armoring’ and alignment of the Santa Clara River and related stormdrain outfalls significantly depreciate the project site and downstream fluvial processes. First, removal of naturally occurring vegetation on the riverbank removes biotic ecosystem services needed to sustain the riverine habitat. Second, armoring and alignment considerably contribute to velocity and intensity of the Santa Clara River waters, which are considered some of the most unpredictable in the State. Third, the proposed management measures for the river are sure to worsen adjacent and downstream river corridor. Data for the Santa Clara River clearly shows the narrowing and incising is due to structural flow management from development. The river channel ecosystem has narrowed by 50% since 1950, riverbank erosion by incision increased, and historically vibrant and necessary riverine vegetation significantly reduced.¹ The impacts to the river system at the site and downstream to the Pacific Ocean from the Newhall Ranch development will be equivalent to cumulative development imprint in the river channel to date.

4

5

6

7

Furthermore, removal of native vegetation in the watershed and sub-watersheds of the proposed Newhall Ranch development combined with the transformation of open space to impervious urbanized surfaces will significantly increase runoff along with erosion and flood potential. The Santa Clara River watershed reach located within the project area is projected to have the following increases of flood events within the next 20 years based on rates of urbanization and climate change in the immediate area:²

8

- o 2-year – 54%
- o 10-year – 61%
- o 50-year – 62%

II. Wildlands Encroachment and Take

The RMDP neglects to analyze existing ecosystem services, losses once take occurs, environmental costs:benefits analyses of habitat values currently present *versus* the built and horticultural replacement planned by the project. The RMDP fails to consider edge effects of the proposed development and nearby existing developments to the open space areas and habitat planned for conservation and recreation. The Plan does not consider impacts to native plant communities and habitat by proposed development and land management activities. There is no scientific analyses regarding alternatives to the management plan.

9

10

11

soils – The thousands of acres of open space that will ultimately be impacted and disturbed by development activities, residential, and commercial activities at Newhall Ranch will severely impact existing ecosystem and biogeochemical processes, along with the life-sustaining carbon, nitrogen, and phosphorus cycles of within the local and regional watershed. Removal of native vegetation in concert with soil disturbing activities of grading and earth removal will significantly contribute to atmospheric carbon release.³ The RMDP does not address measures to ensure native vegetation and soils conditions will be conserved for ecosystem services and greenhouse gas management.

12

¹ Downs, PW; Dusterhoff, SR; Sears, WA. 2013. Reach-scale channel sensitivity to multiple human activities and natural events, Lower Santa Clara River, CA, USA. *Geomorphology*. 189:121-134

² Sheng, J; Wilson, JP. 2009. Watershed urbanization and changing flood behavior across the Los Angeles metropolitan region. *Natural Hazards*. 48:1:41-57

³ Schlesinger, W.H. & Andrews, J.A. 2000. Soil respiration and the global carbon cycle. *Biogeochemistry*. 48:7-20.
Newhall Ranch Resource Management & Development Plan; Spineflower Conservation Plan EIR
CNPS, LA/SMM Chapter. February 13, 2017, page 2

Comment Letter No. 06

native tree removal - The RMDP fails to address environmental compensation for slated removal of native oaks, walnut, sycamore, cottonwood, and willow within project footprint. The leaf litter alone from these trees is responsible for up to 50% soil carbon storage in the areas where they grow. The Plan does not address adequate mitigation to the River, uplands, and ecosystems these important species provide.⁴

13

sage scrub ecosystem – this most threatened of ecosystems in the state also serves as a carbon sink. Much of the project area is located within this habitat type. Areas on the edge of the development will serve as nurseries for alien invasive plant species, which will further threaten habitat values for this rare ecosystem type. Sage scrub with high percentage of non-natives shows a dramatic loss of functionality as a carbon sink. Succession through mature sage scrub growth restores biotic balance and capacity to outcompete alien species and serve as a significant carbon sink.⁵ The RMDP does not address adequate protections for sage scrub habitat.

14

freshwater Santa Clara River ecosystem - Recent research determined twice as much carbon enters this ecosystem type than ambient terrestrial areas. Aquatic sediment holds 11% of the ecosystem carbon. Carbon dioxide is released by 42% of these ecotypes. Equal amounts of inorganic and organic carbon are discharged from these systems into the ocean. The role of freshwater carbon transport, oxidation, and storage is therefore significant.⁶ However, the urbanization of the river within the project development corridor will no longer support the riverine ecosystem due to removal of native vegetation resulting in higher water temperatures, increased non-point source and point source pollution, encroachment by humans and domestic animals, and disruption of the river habitat corridor.

15

Newhall natural resources management plan

Finally, the RMDP approaches to ecosystem planning appear not to be adaptive, flexible, analytical, collaborative, and resilient. Priority considerations should include:

- Insurance that areas with high topographic diversity and intact migration corridors that enable species to migrate readily in response to rapid environmental change
- Retention of corridors such as urban green spaces with native vegetation
- Protections for the existing functional riparian corridor and all tributaries
- Prioritizing conservation of biodiversity hotspots, locations, and pathways that enable species to adjust to rapid environmental change from development and climate change
- Preservation of genetic and species diversity within the project and fringe areas
- Renewing functional diversity of degraded systems

16

II. Spineflower Management Plan (SMP)

A recent report about San Fernando Valley spineflower states "At this time, we conclude that there may not be sufficient resiliency, representation, or redundancy to sustain SFVS over the long term, given current and future stressors acting upon the taxon." The FWS report added the species is under high magnitude threat and low recovery potential. It is currently being considered for elevated list status by the agency.

17

The population located within the Newhall Ranch development footprint is one of only two known extant populations. It is threatened by agriculture, non-native plant competition, climate change, encroachment by

18

⁴ Yanai, R., Currie, W. & Goodale, C. Soil carbon dynamics after forest harvest: a system paradigm reconsidered. *Ecosystems* (2003) 6: 197

⁵ Coyle, D. R., Nebeker, T.E., Hart, E.R., Mattson, W.J. January 2005. Biology and management of insect pests in North American intensively managed hardwood forest systems. *Annual Review of Entomology*. 50:1-29.

⁶ Cole, J.J., Prairie, Y.T., Caraco, N.F. *et al.* Plumbing the global carbon cycle: integrating inland waters into the terrestrial carbon budget. *Ecosystems*. 2007. 10:172.

Newhall Ranch Resource Management & Development Plan; Spineflower Conservation Plan EIR
CNPS, LA/SMM Chapter. February 13, 2017, page 3

Comment Letter No. 06

humans, recreation, and domestic animals. CNPS believes the Newhall development will diminish its survival potential, and the very real potential for random stochastic events such a modified climate changing the plants habitat suitability, that there are imminent threats of high magnitude for the extinction potential of *Chorizanthe parryi* ssp. *fernandina*. 18

Incomplete analysis of active threats

The California Department of Fish and Wildlife take permit for this plant further compounds the threat of extinction to the spineflower. The SMP fails to adequate ensure sustainable longterm viability of the existing population due to a lack of addressing loss of habitat, the aforementioned threats, and population pressures listed below: 19

i. development (the habitat of fifty percent of the plant is proposed to be permanently fragmented into poorly designed, small rare plant preserves), 20

ii. small isolated populations (two), nonnative plant competition (annual introduced grasses), 21

iii. nonnative animals (specifically Argentine ants), 22

iv. adverse land use including recreation and trampling, increase in fire frequency 23

v. effects of landscape-level grading, erosion, artificial reconstruction for slope stabilization, channelization of all tributaries to the Santa Clara River and re-contouring of existing hydro-geology within the proposed project area that is Newhall Ranch 24

Missing in the analysis of threats is the current land use (irrigated agriculture, non-native animals including Argentine ants in occupied habitat, grazing, and oil fields) at the Newhall site. 25

Additionally, the current land use seems to be missing from the analysis of effects for the plant. Currently there are active agricultural operations including irrigated agriculture (Argentine ant facilitator), crop management with large equipment, and ongoing grazing. What percentage of the habitat is contaminated by the Argentine ant? Any loss or habitat degradation of existing subpopulations should be considered significant. Also, there seems to be an old oil field or evidence that well operations were part of the land use patterns that could result in soil remediation with attendant large scale hydraulic modification to the drainage patterns. The landscape is heavily modified with an extensive network of roads and trails with the high potential to facilitate introduction of invasive, competitive non-native plants, where is the analysis of effects for this current habitat degradation and the future stability of the population. There is no analyses regarding take of some of the occupied habitat by agricultural and grading activities at Newhall. 26

27

28

Design and adaptive management

The spineflower conservation plan is based on the rare plant preserve design. The development proximity to reserves will eliminate the natural functioning of the rare plant habitat. The needs of the development place hostile adjacent ecologic functions in close proximity to all portions of the existing occupied habitat of the spineflower. These post-development functions will require intensive, questionably successful on site management in perpetuity to prevent the adverse influences that are anticipated by the adaptive management program. CNPS does not believe that the preserve design that is directly connected to proposed open spaces can support landscape-level ecological functions and processes as stated in the proposed rule. Proximity of the adjacent open spaces do not ensure habitat values inherent in the existing coastal sage scrub habitat of the present Newhall Ranch population. 29

Comment Letter No. 06

Preserve design problems include the concept of population fluctuations within the preserve areas. This premise cannot predict future habitat function where the populations could have migrated beyond the borders of the preserve boundaries. This process has been documented in other attempts to design rare plant preserves in California. Future needs of the plant might not be available because the loss and modification of immediate adjacent habitats that would elevate the potential for extirpation and likely extinction. This species has been observed for such a short amount of time that the ability to truly understand the footprint requirements of the plant remain largely unknown; to create such a small rare plant reserve has the potential to reduce long term success to maintain a viable population into the future.

30

31

Preserve designs are faulty in that they do not provide a large enough buffer to include the requirements for persistence of native ants or other ground nesting arthropods that might be critical to the functioning ecosystem needed for the SFVS. Pollinators of spineflower include at least six arthropod taxa, with two native ant species responsible as primary propagators for the plant.⁷

32

The entire rare plant reserve design proposed requires that there will be an Argentine ant control program. Argentine ants around homes are a constant problem that homeowners have yet to successfully control. Almost all home invasions are modified through the use of chemicals and the scale of invasions needing controls will undoubtedly result in the application of some sort of chemicals at an unspecified scale that will have an unknown affect on the native species. That might be incompatible with adjacent residential neighborhoods. This is a forever management action proposed for fifty percent of the plant distribution.

33

These proposed controls for Argentine ant pose imminent threat to the entire Newhall spineflower population. The environmental effects proposed control program will be exacerbated by the introduction of myriad pesticides that will accompany the anthropogenic community of the proposed development that is Newhall Ranch. The control program for Argentine ant will destroy the populations of pollinators necessary for existence of the spineflower, thereby serve as a primary vehicle for the demise and eventual destruction of the entire Newhall spineflower population that comprises 50% of the documented plant.

34

These proposals have never been tried, this action will affect fifty percent of the plants occupation in nature. The Argentine ant is listed as the most significant threat to the plant and yet the rare plant reserve design will place that threat in immediate proximity that will require attempts at potential control.

35

Stability and persistence of populations

After the take authorized for 25% of the occupied *Chorizanthe parryi* ssp. *fernandina* habitat, the remaining seventy five percent of the Newhall population is hypothesized to persist into the future in rare plant preserves. These preserves are designed with inadequate buffer distance and includes bordering land use that is expected to be occupied by the Argentine ant, probably the largest threat to the spineflower. The implementation of the preserve design requires immediate need for threat control of an invasive species that is an urban pest. Functionally, one half of the known distribution will be compromised.

36

The rare plant preserves are to be part of a land use designation of open space. Missing are descriptions of alternative outcomes for the utility of the open space design that is described as intending to maintain landscape level ecological functions. A definition of the word intended includes 'wished for'. Immediately following this hopeful statement is the disqualifying description that, "...human development would be adjacent to or border the majority of the preserves..." Landscape level periodic wildfires and high functioning predator prey interactions will not be possible. The rare plant preserves must have a large buffer surrounding the population footprint otherwise the long term natural survival of the spineflower is highly doubtful.

37

⁷ Jones, C. Eugene et al. "Reproductive Biology of the San Fernando Valley Spineflower, *Chorizanthe parryi* var. *fernandina* (Polygonaceae)." *Madroño*, vol. 56, no. 1, 2009, pp. 23-42. www.jstor.org/stable/41425796.

Newhall Ranch Resource Management & Development Plan; Spineflower Conservation Plan EIR
CNPS, LA/SMM Chapter. February 13, 2017, page 5

Comment Letter No. 06

Basically, the spineflower will be reduced to one single natural population with a horticultural experiment at Newhall. One glaring error in the experiment is that there is no plan if the SMP is unsuccessful. This furthermore exacerbates the threat of endangerment for the plant. 38

There is no information in the SMP on the ability to successfully minimize the effects of nonnative grasses through potential management actions. Potential, untried actions should not influence the current level of threat analysis. 39

CNPS disagrees with the statement that Argentine ants can be effectively managed within and adjacent to the preserves through the use of adaptive management. There is no possible way to understand how the proposed severe habitat alteration will affect the biota into the future especially where such large ecosystem modifications will occur with the scale of development proposed for the immediate vicinity of the SFVS. The dismissal of the threat is premature and it is a major threat. The problem with adaptive management with such a small population is that there is no room for error correction, if the attempts to adapt management strategies fail, the plant is history. The incorporation of adaptive management objectives for a threat that will be introduced to the habitat of the spineflower, into the design of the rare plant preserve is a statement that the design is faulty. To be able to preserve rare elements and their habitats will require a much larger reserve than is proposed. 40

The success or failure of the proposed Plan will require 25 or more years to determine. The use of positive outcomes of the Plan (enhancement and introduction) can only occur after a measured success. The effectiveness of proposed conservation measures cannot be evaluated for many years and any determination of spineflower vulnerability needs to be based on existing threats not a reliance on conjecture of potential future success. 41

The reliance of adaptive management to successfully address severe habitat modification is premature. Deliberately placing potential avenues for Argentine ant invasions is inviting a high potential for failure. There needs to be a consideration that the reality is the project design and ongoing adaptive management will facilitate the loss of populations and viability of the proposed rare plant reserve complex. Especially when the adaptive management objectives include statements of 'to the extent feasible,' which is a mitigation condition at the heart of biodiversity decline worldwide. 42

The conclusion is that proposed adaptive management strategies will allow actions that will severely modify the supporting ecosystem through habitat modification and isolation. In fact, the action of compromising one of the two populations automatically means that the species can never be protected or recovered and therefore is moved closer to extinction through potential stochastic elements. 43

Additional factors need to be considered within analysis of effects

Wildfire
 Within the introduction to the five factors is the statement that wildfire is a threat to the spineflower. This statement appears to have no justification. It is possible that the elimination of periodic fires, a normal function of the landscape level ecologic function, might be a threat that should be analyzed. 44

Trespass
 Adverse recreation through trespass into the rare plant reserves is highly likely, neighborhood dogs and cats are also a highly potential influence on landscape level ecosystem functions. 45

Comment Letter No. 06*Changes in predator populations*

The isolation by urban development will change predator populations and control of rodents that could modify the functions of the rare plant reserve, through burrowing and grazing/browsing and type converting the ecosystem. This needs to be included in the analysis of effects to the plant.

46

Effects of hydro-geological modifications inherent in the proposed development of Newhall Ranch

The earth-moving activities, changes in hydrology, in the contributing sub-watershed that services the existing habitat and spineflower population may have both short and longterm effects.

47

Pollinator sustainability

The proposed Argentine ant control program is diametric to the protections of the populations of existing documented arthropods responsible for servicing the viability of the spineflower.

48

Conclusion

A high potential for the loss of the species exists with the Newhall spineflower population through inadequate rare plant reserve design and introduction of controls for the anticipated encroachment of Argentine ant. Twenty-five percent loss of the Newhall population projected due to externalities affecting the preserve is a significant portion of the spineflower range. Loss can effectively be 50% of the total documented plant population over time with the implementation of the proposed Argentine ant control program.

49

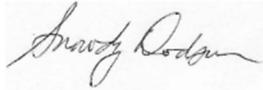
There are only two populations of SFV spineflower. By that very fact stochastic threats to very small populations elevate the threat of extinction.

50

Based on the information above, we find the Spineflower Management Plan as proposed to be a death sentence to the existing Newhall population. It must be reconsidered and rewritten using better rare plant recovery science and planning methodology.

51

Sincerely,



Snowdy Dodson, Chair
Los Angeles/Santa Monica Mountains Chapter
California Native Plant Society

Comment Letter No. 07

Wildlife Newhall Ranch

From: Elisabeth Landis <betseylandis@sprintmail.com>
Sent: Tuesday, February 07, 2017 4:44 PM
To: Wildlife Newhall Ranch
Subject: Comments on Newhall Ranch Draft AEA
Attachments: CNPS letter on Newhall Ranch CDFE draftAEAFinal,BL20170206.pdf

Attached is a letter from the Los Angeles / Santa Monica Mountains Chapter of California Native Plant Society commenting on the Newhall Ranch Draft AEA.

I [1]

Thank you for giving us more time to study and respond to this draft AEA.

I [2]

Betsey Landis
Vice President
Los Angeles / Santa Monica Mountains Chapter California Native Plant Society

Comment Letter No. O7

California Native Plant Society

Los Angeles / Santa Monica Mountains Chapter

3908 Mandeville Canyon Road, Los Angeles, California 90049

February 6, 2017

California Department of Fish and Wildlife
Betty Courtney <newhallranch@wildlife.ca.gov>
3883 Ruffin Road
San Diego, California 92123

Dear Betty Courtney:

RE: Comments on Newhall Ranch Draft Additional Environmental Analysis (AEA)

California Native Plant Society has commented on previous documents pertaining to this development and instituted legal action based on insufficient protection for an endangered plant, *Chorizanthe parryi* var. *fernandina* and other concerns about loss of native plants that are locally rare or are protected oak species. We are concerned about the amount and effect of twelve years of grading and construction on both sides of the Santa Clara River, an SEA, the only free-flowing river in Los Angeles County. Native plant habitats, indeed the native ecosystems of the watershed, floodplain and the river itself may be irreparably harmed by this project. Air pollution will be a major problem for all.

The Additional Environmental Analysis (AEA) through its omissions and inaccuracies, tends to support this conclusion.

Comments on specific sections of the AEA:

GHG Emissions Inventory (RMDP / SCP, Los Angeles County):

1) Table 2-10a: Number of Net New Trees is given as "Entrada Center (EC) 2,500 trees, Newhall Ranch Specific Plan (NRSP) 35,000 trees, and Valencia Commerce Center (VC) 5,000 trees. No tree species given, only "Miscellaneous tree types". Since tree species vary considerably in their emissions of gases and in their ability to sequester Green House Gases (GHG) and since all these trees will be young and have no GHGs already sequestered, this table is totally useless in calculating total emissions or sequestering in the final vegetating of Mission Village.

2) Table 2-10b: Vegetation Change Evaluation: This table lists Area, Type of Vegetation Change, Initial Acres, Final Acres and CO2 Emissions.

a. Area: The total acreage covered is 5,495 acres (ES+ NRSP+VCC). Except for 130 acres described as "Agricultural, Developed or Disturbed", the other 5,365 acres are completely denuded of vegetation during development of this project according to this table.

What happened to the three San Fernando Valley Spineflower Preserves?

What happened to the mature native oaks and other native tree species protected by the Los Angeles County Tree Ordinance? Fifty-three protected/Heritage oaks were to be removed. What happened to the other native oaks and protected native trees?

What happened to the wetland habitats protecting locally rare or rare species of animals?

3

4

5

6

7

8

9

10

CNPS Comments on CDFW Newhall Ranch draft AEA, Feb. 5, 2017, page 1

Comment Letter No. 07

2) Table 2-10b: Vegetation Change Evaluation (continued):

b. Type of Vegetation Change: This section of the table lists types of vegetation so general as to be absolutely useless in determining what the sequestering histories of the plants in these “Types of Vegetation were or what the actual GHG emissions (in metric tons) were for the lifetimes of those plants? or per year?. This section does not specify whether the metric tonnages of emissions were for one year or for the lifetimes of each species of plant in each of the “types” which are described as: Cropland, Grassland, Trees, Agriculture, Developed or Disturbed, Bog and Marsh, Broad Leaf and Upland Trees, Grass and Herbs, Riparian and Bottomland, Scrub and Chaparral.

11

At this point, it must be pointed out that CDFW has a major reference source available to all its staff entitled Manual of California Vegetation written by one of the top staffers in CDFW, a famous professor at Humboldt State University, and a vegetation expert on the state staff of CNPS. The book is in its second edition and covers site-evaluated vegetation alliances from all over California. It took years to gather the field information, analyze it and write the Manual of California Vegetation. To see a footnote to Table 2-10b stating that “Two sets of tree land use change were modeled, based on the land designations of ‘Broad Leaf Upland’ and ‘Riparian and Bottomland’ for the CDFW Draft Joint EIS/EIR is inexcusable. What sets of tree land use were used? New England maple trees? Florida cypress?

12

The Manual of California Vegetation lists hundreds of vegetation alliances with lists of species. The Manual covers the species and describes their alliances for the areas of this proposed development. Why wasn’t this valuable reference used?

13

The main assumptions of this table appears to be that none of the native or non-native vegetation sequestered or was sequestering any carbon and that all the hundreds of plant species on this acreage emitted GHG. This is totally false.

14

c. The last lines of this table are that “Net New Trees will sequester 30,000 metric tons (MT) in their 20-year growth period (not a scientifically supported number), while the vegetation that had been removed had emitted 70,149 MT (not a scientifically supported number), so, guess what? That leaves 40,000 MT, which amortized over 30 years comes to a net emission of 1,335 MT/year, apparently a safe number of GHG emissions. What are the species of trees? What is the rate of sequestration of carbon of each species? What is the expected life span of each tree species? Some of the trees are supposed to be replacements for the oaks being bulldozed. Oaks live long lives and do sequester carbon quite well, though at different rates depending on weather changes. What is the effect of drought on the ability of any tree species to sequester carbon?

15

The Vegetation Change Evaluation table is full of erroneous assumptions, inaccurate information and is generally useless.

16

One factor missing in this discussion of vegetation is:
 What happens to all the green waste and woody waste bulldozed on all this acreage? This represents many tons of organic material that must be taken somewhere for processing. CalRecycle does not permit organic waste to be landfilled, so the material must go to locations where it can be mulched, chipped and ground, and/or composted. Chiquita Canyon Landfill, located on the north side of the Santa Clara River not far from this development, is seeking an extension and modification of its land use permit so it can continue in operation for years. Part of its application is to establish an area for organic processing. So, if Chiquita Canyon Landfill gets a new CUP, all the many tons of green waste and woody waste from this 12-year project can be trucked across the Santa Clara River to Chiquita Canyon.
 That means that all that organic waste will be nearby, emitting methane, carbon oxides, NOXs and SOXs as it awaits processing and some final destination, if different than Chiquita Canyon. Processed organic wastes

17

18

Comment Letter No. 07

have to meet health standards before they can be sold commercially. Those metric tonnages per year were not considered at all in this vegetation evaluation.

18

A suggestion to improve the project design, cut back on GHGs and save water is to cut back on grading and installation of storm drains on the project slopes. It is a waste of rainwater and a loss of groundwater to bulldoze deep ditches in the current natural drainages and install large storm drains to channel water into the Santa Clara River, where it eventually goes to the ocean. A storm drain system will cause major erosion to the floodplain and natural habitats along the Santa Clara River.

19

20

Usually natural drainages follow bedrock formations, so, in times of chaotic and frequent rainstorms, the slopes become saturated down to bedrock, the bedrock gets slippery and heavy wet soils turn into dangerous mudslides. The force and speed of these mudslides can choke storm drains and even rip them out of the ground. The Council for Watershed Health and the Metropolitan Water District have developed projects in some areas that use the streets and adjoining landscaping as a system to slow down rapidly moving water and to capture it in swales and basins.

21

If this were done in the Mission Village project, GHGs from construction of large storm drain systems would be cut drastically. The water captured would be used to irrigate landscaping, recharge groundwater and protect the Santa Clara River ecosystems from serious erosion.

22

Conclusion:

23

None of the tables in this AEA present realistic scenarios, unless one looks carefully at what is not said. The air pollution including particulate matter will be bad for twelve years. There is grading every year, which means particulate matter will be coating everything, including vegetation, making it difficult for plants to grow and plant eaters to survive. Twelve years is a long enough time to cause irreversible losses to both plant and animal species. As noted above, the model used for computing GHG emissions is inadequate.

24

25

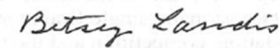
We cannot support approval of this draft AEA. It needs serious reworking.

26

Sincerely,



Snowdy Dodson
President
Los Angeles / Santa Monica Mountains Chapter, CNPS



Betsey Landis
Vice President
Los Angeles / Santa Monica Mountains Chapter, CNPS

cc: specialprojects@planning.lacounty.gov
daranda@planning.lacounty.gov