



Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



Jon Sanabria  
Acting Director of Planning

August 24, 2009

Mr. Dennis Bedford  
California Department of Fish and Game  
4949 Viewridge Avenue  
San Diego, CA 92123

Dear Mr. Allen:

**SUBJECT: NEWHALL RANCH RESOURCE MANAGEMENT AND DEVELOPMENT PLAN  
AND SPINEFLOWER CONSERVATION PLAN  
STATE CLEARINGHOUSE NO. 2000011025**

The County of Los Angeles appreciates the opportunity to comment on the Draft Joint Environmental Impact Statement and Environmental Impact Report (Environmental Document). The applicant, Newhall Land and Farming Company, has several pending applications related to the implementation of Newhall Ranch Specific Plan and other related projects (Project). We reviewed the Environmental Document for these projects and offer the following comments for your consideration:

**Hazards – Soils/Geology**

The site is located within potentially liquefiable and earthquake-induced landslide areas per the State of California Seismic Hazard Zones Map – Newhall, Val Verde, and Santa Susana Quadrangles.

**Hazards – Flood/Water Quality**

Areas identified for resource conservation/mitigation/preserves should not be located within the limits of infrastructure/facilities identified for public maintenance, whether existing or proposed. Discuss and specify any affected infrastructure/facilities in the Environmental Document.

**Services – Sewage Disposal**

The County of Los Angeles Department of Public Works Consolidated Sewer Maintenance District is responsible for the operation and maintenance of the local sewers within the Unincorporated Los Angeles County area. Therefore, any sewer construction project within

the study area must comply with Public Works' sewer design standards and will be required to be annexed to the Consolidated Sewer Maintenance District.

4

The Environmental Document should discuss the collection and disposal of the wastewater that would be generated within the proposed project area, especially the Project's potential impact on the available capacity in the existing local sewer lines for both peak dry- and wet-weather flows pursuant with the Statewide General Waste Discharge Requirements (Order No. 2006-0003). The DEIR should also include discussion on the impact of the proposed project on the existing local and trunk sewer facilities.

5

The Specific Plan Conceptual Backbone Plan, Figure 2.0-12, is not consistent with the Newhall Ranch Conceptual Sewer Master Plan dated November 16, 2006, prepared by Dexter Wilson Engineering, Inc. and agreed upon by Public Works and the Los Angeles County Sanitation District. Please revise the Environmental Document to reflect the current master plan agreement.

6

### **Traffic/Access/Road Maintenance**

The Environmental Document should include discussion of required long term permits, permits renewal requirements, and their effects on public infrastructures maintenance. Long term permits such as a Master Streambed Alteration Agreement (MSAA) should be provided by the developer to the county and be in place prior to the maintenance acceptance of any road, bridge or floodway facilities by Public Works. The Santa Clara River portions of the MSAA should allow for necessary work at bridges.

7

The roadway culvert structures may also qualify as county bridges or NBI bridges. These infrastructures will require annual/biennial inspection and ongoing maintenance. Typical maintenance would require machine access to the culvert to access the structure and consist of removing sedimentation and overgrown vegetation from around the inlets and outlets of the structures and at bridges.

8

### **Biological Resources**

As the proposed developments will impact wildlife movement along the Santa Clara River, the Environmental Document should analyze potential impacts to keystone species such as the mountain lion. To maintain their genetic diversity and a stable population, mountain lions need wildlife corridors to move back and forth between habitats and components of their territories. Wildlife corridors are needed to allow them to disperse when they become adults. Back and forth movement is also needed to allow the population to breed with individuals that are not close relatives thus maintaining genetic diversity. Therefore, in areas where they are the top predator, the mountain lion requirements may be used as a gauge for what is required for a functional wildlife movement area. If mountain lions can use a corridor, then it can be assumed that most animals that also need natural corridors for dispersal will also be able to use the corridor.

9

The impact to the riparian habitat and narrowing of the Santa Clara River corridor should be evaluated beyond the project boundary in a quantitative manner. This will enable a more realistic assessment of the cumulative impacts. The natural and chiefly natural habitat should be summarized and broken into specific categories of general vegetative types such as alluvial, scrub, and forest.

10

### **Climate Change**

The Global Warming Solutions Act, also known as AB 32, requires reduction in greenhouse gas emissions to 1990 levels by 2020. Although AB 32 does not mention specifically cumulative impacts CEQA or NEPA, climate change has been recognized by statute as an environmental impact since 2002 (California Health & Safety Code 43018.5). State agencies and the California Attorney General also concur that the EIRs must address climate change. We suggest that the Environmental Document analyze the cumulative impact of the projects on climate change.

11

Please contact Mr. Samuel Dea of my staff at (213) 974-4808 or [sdea@planning.lacounty.gov](mailto:sdea@planning.lacounty.gov), Monday through Thursday from 7:00 a.m. to 6:00 p.m. if you have any questions. Our offices are closed on Fridays.

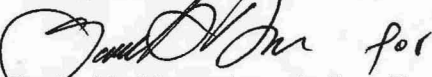
12

Sincerely yours,

### **DEPARTMENT OF REGIONAL PLANNING**

Jon Sanabria

Acting Director of Planning



Serin H. Alexanian, Acting Deputy Director  
Current Planning Division

JS:SHA:SD:sd

Cc: Toan Doung, Public Works Land Development Division

**From:** "Dea, Samuel" <sdea@planning.lacounty.gov>  
**To:** NEWHALLRANCH@dfg.ca.gov  
**Date:** Tue, Aug 25, 2009 5:22 PM  
**Subject:** Newhall Ranch EIS/EIR Comments

Greeting Mr. Bedford,

Attached for your consideration is a letter from the County of Los Angeles on the EIS/EIR.

Thanks,

Samuel Dea

Supervising Regional Planner

Special Projects Section

Phone: (213) 974-4808 (please note new phone number)

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**014. Letter from Los Angeles County Department of Regional Planning, dated August 24, 2009**

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**Response 1**

The comment is an introduction to comments that follow. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is provided.

**Response 2**

The comment states that the Project site is located within potential liquefiable and earthquake-induced landslide areas per the State of California Seismic Hazard Zones Map. The Draft EIS/EIR acknowledged that the Project site may be affected by liquefaction and landslides, and these hazards are described in **Section 4.13**, Geology and Geologic Hazards. Specifically, on-site landslide hazards are described in **Subsection 4.13.4.6.3** (Slope Failure/Landslides), and liquefaction hazards are described in **Subsection 4.13.4.6.4** (Liquefaction). More particularly, on page 4.13-27, the Draft EIS/EIR acknowledged, consistent with the comment, that:

"Numerous landslides, ranging from shallow surficial failures to large landslides are present in the Project area. The larger landslides are depicted on **Figures 4.13-1** through **4.13-3**. Many of the larger identified landslides are on the south side of Salt Creek Canyon, which is designated as open space. There are numerous existing landslides located on the eastern, southern, and northwest portions of the Project area. A total of 112 landslides were mapped on the Homestead portion of the Specific Plan site, including 20 at the proposed Chiquito Business Park, 20 at the Chiquito Estate lots, 20 at Homestead Central, 17 at Homestead West, nine at Potrero Ridge, 15 at Long Canyon, and 11 at Mesa West. An additional 52 landslides were mapped on the Mission Village portion of the Specific Plan site. No landslides were found at the Landmark Village, WRP, or Onion Field areas of the Specific Plan site.

Nearly all of the Santa Clara River bed is mapped as a liquefaction hazard by the CGS Seismic Hazard Mapping Program (Val Verde and Newhall quadrangles). The Newhall Ranch Specific Plan Program EIR reported that sands associated with the Santa Clara River and adjacent sandy areas are generally dense and have a low potential for liquefaction, even assuming a conservative value for the bedrock acceleration of 0.6g. However, shallow liquefaction features occurred on the Project area during the Northridge earthquake, primarily in recent, shallow sand deposits in and around the Santa Clara River area. These relatively small sand boils were the result of shallow liquefaction. Further liquefaction features, such as sand boils and blows, were also observed in Potrero Canyon following the Northridge earthquake." (Draft EIS/EIR, p. 4.13-27.)

The effects of these hazards on the proposed Project were also evaluated by the Draft EIS/EIR, **Section 4.13**, and it was determined that potentially significant liquefaction and landslide hazards would be reduced to a less-than-significant level with the implementation of mitigation measures previously adopted in connection with approval of the Newhall Ranch Specific Plan and Valencia Commerce Center (VCC) project. The Draft EIS/EIR further found that the adoption and implementation of measures

similar to those previously adopted for the Specific Plan area would ensure that potential impacts related to geology and geologic hazards within the Entrada planning area are reduced to the extent feasible. The Entrada planning area has not yet been approved for build-out by the County of Los Angeles (County); therefore, site-specific geotechnical data and evaluations are not available. However, because of the proximity of the Entrada planning area to the Specific Plan area, geotechnical conditions are expected to be the same/similar. In addition, it is expected that the County would require the same or similar mitigation measures as those required for Specific Plan approval in order to alleviate any geological concerns. Please also see revised **Section 4.13** of the Final EIS/EIR.

### **Response 3**

The comment states that areas identified for resource conservation should not be located within the limits of infrastructure facilities identified for public maintenance. Facilities that would be maintained by the Los Angeles County Department of Public Works (DPW) are identified in **Subsection 2.6.8** of the Draft EIS/EIR. These facilities generally include flood, drainage and water quality protection facilities. These facilities would not be located in resource conservation, mitigation or preserve areas. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

### **Response 4**

The comment states that any sewer construction activities located within the Project site must comply with the sewer design standards of DPW's Consolidated Sewer Maintenance District, and must be annexed into the District. The proposed Project will conform to all local requirements, including the requirements of DPW's Consolidated Maintenance District. For example, as provided on page 2.0-44 of the Draft EIS/EIR:

"The Specific Plan Conceptual Backbone Sewer Plan is found on Exhibit 2.5-3 of the approved Specific Plan, which is reproduced and shown on **Figure 2.0-12**. The plan sets forth a conceptual system for sewage collection that includes the Newhall Ranch WRP, a collection system with pump stations, and both gravity and force mains/siphons. All facilities of the sanitary sewer system are to be designed and constructed for maintenance by the County of Los Angeles and/or the Sanitation Districts in accordance with their criteria, procedures, and requirements."

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

### **Response 5**

The comment states that the Draft EIS/EIR should discuss the collection and disposal of the wastewater that would be generated within the Project area, particularly the proposed Project's potential impact on sewer line capacity. To preface, the proposed Project would not directly generate wastewater. As discussed in Draft EIS/EIR **Section 2.0**, Project Description, the Resource Management and Development Plan (RMDP) component of the proposed Project is a conservation, mitigation, and permitting plan for the long-term management of sensitive biological resources within the 11,999-acre Specific Plan area, and also would result in development-related infrastructure improvements in the Santa Clara River and tributary drainages needed to implement the approved Specific Plan. The Spineflower Conservation Plan

(SCP) component of the proposed Project conservation and management plan to permanently protect and manage a system of preserves designed to maximize the long-term persistence of core occurrences of spineflower, a federal candidate and a state-listed endangered plant species.

**Subsection 2.5.1.3.5** (Sanitary Sewer) of the Draft EIS/EIR indicated that the Specific Plan Conceptual Backbone Sewer Plan, set forth in the previously approved Newhall Ranch Specific Plan and certified environmental documentation, sets forth a conceptual system for sewage collection that includes the Newhall Ranch WRP, a collection system with pump stations, and both gravity and force mains/siphons. The section also indicated that all facilities of the sanitary sewer system are to be designed and constructed for maintenance by the County and/or the Sanitation Districts in accordance with their criteria, procedures, and requirements. There is no urban development presently on the Project site and there are no existing local and trunk sewer facilities. In sum, the proposed Project would not result in any direct impacts to existing wastewater conveyance facilities. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

#### **Response 6**

The comment states that the Specific Plan Conceptual Backbone Sewer Plan is not consistent with the Newhall Ranch Conceptual Sewer Master Plan (November 2006). The Specific Plan Conceptual Backbone Sewer Plan was prepared to generally depict a sewer system that would be capable of serving Specific Plan development. The 2006 Newhall Ranch Conceptual Sewer Master Plan, referenced in the comment, updates the conceptual sewer information provided in the approved Specific Plan. The Draft EIS/EIR, **Subsection 2.5.1.3.5**, Sanitary Sewer, provides: "All facilities of the sanitary sewer system are to be designed and constructed for maintenance by the County of Los Angeles and/or the Sanitation Districts in accordance with their criteria, procedures, and requirements." (Draft EIS/EIR, p. 2.0-44.) Therefore, the comment is correct that the 2006 Newhall Ranch Conceptual Sewer Master Plan is the most current depiction of the sewer system that will service Specific Plan development. As a caveat and as indicated in the Draft EIS/EIR, the ultimate sewer design will be in accordance with County requirements, such that subsequent design plans also may be prepared. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

#### **Response 7**

The comment states that the Draft EIS/EIR should discuss any needed long-term permits, permit renewal requirements, and the effects of permits on public infrastructure maintenance. All permits required for the proposed Project are described in **Subsection 2.3**, Requested Project Approvals, and **Subsection 2.4**, Other Permits and Approvals. As described in **Subsection 2.3.4.1** (Fish & Game Code, sections 1600-1616), the requested Master Streambed Alteration Agreement (MSAA) must be obtained by the Project applicant for activities such as the excavation or placement of fill within a stream channel, vegetation clearing, installation (and sometimes operation) of structures that divert the flow of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement. The requested MSAA is required prior to the construction of roads, bridges or floodway facilities that would substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river or stream. Therefore, the MSAA must be obtained prior to the start of specified facilities described by the proposed RMDP and the MSAA will be provided to the County prior

to the acceptance of facility maintenance. Additional information regarding the maintenance of the proposed facilities is found in the Draft Newhall Ranch Resource Management and Development Plan (Draft EIS/EIR, **Appendix 1.0** -- Draft Maintenance Manual (Appendix A)). The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is provided.

#### **Response 8**

The comment states that the proposed roadway culvert structures will require annual/biennial inspection and ongoing maintenance. The inspection and maintenance activities described by this comment are acknowledged in the Draft EIS/EIR, **Subsection 2.6.8**, Maintenance Activities. For example, page 2.0-144 of the Draft EIS/EIR provided:

"DPW or other entity would be responsible for the maintenance of flood, drainage, and water quality protection facilities located within the RMDP study area. In general, maintenance activities would involve the periodic inspection of the structures to ensure that the structures are intact, and to monitor vegetation growth and sediment buildup at or near the structures. These maintenance activities would ensure that the integrity of the structures is maintained and that planned conveyance capacity is present. Vegetation and sediment would be removed when the capacity of facilities has been reduced."

Additional information regarding the maintenance of the proposed facilities is found in the Draft Newhall Ranch Resource Management and Development Plan (Draft EIS/EIR, **Appendix 1.0** – Draft Maintenance Manual (Appendix A)).

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is provided.

#### **Response 9**

The comment suggests that the adequacy of the wildlife corridors should be evaluated by considering whether the corridors are sufficient for mountain lions, stating that "[i]f mountain lions can use a corridor, then it can be assumed that most animals that also need natural corridors for dispersal will also be able to use the corridor." Project-related impacts to wildlife movement received extensive analysis in the Draft EIS/EIR. For example, **Subsection 4.5.5.2.4.3**, Impacts to Wildlife Corridors, addressed "local habitat connectivity and wildlife movement within the immediate Project area after implementation of the RMDP and SCP and build-out of the Specific Plan, VCC, and Entrada planning areas." (Draft EIS/EIR, p. 4.5-579.) The analysis considered thirteen potential corridors within the Project area. (Draft EIS/EIR, p. 4.5-578.)

The analysis provided by the Draft EIS/EIR concluded that general Project-related impacts to wildlife corridors would be adverse but not significant with implementation of proposed mitigation measures. The conclusion of the wildlife corridor impact analysis provided by the Draft EIS/EIR is summarized below:



"Implementation of the RMDP and build-out of the Specific Plan, VCC (Alternatives 2 and 3 only), and Entrada planning areas would have a significant impact, absent mitigation, to existing wildlife corridors with the Project area under Alternatives 2 through 7. The primary impacts of the Project would occur as a result of the build-out because most of the tributaries would be bordered by development, resulting in wildlife corridors that are long and narrow. As noted above, species that can move rapidly and/or are relatively unaffected by urban development, such as coyotes, are expected to regularly use these constrained corridors. Other species that are somewhat tolerant of human presence, but generally require vegetative cover habitat, such as bobcat and mule deer, are also likely to use these constrained corridors. Mountain lion and American black bear are expected to be generally excluded from these constrained corridors. As described above for Alternative 2, most of the culverts will be passable by wildlife, with the exception of two culverts in Long Canyon that may be a barrier to mule deer. In addition, as described in detail for Alternative 2, these constrained corridors will introduce secondary effects that make them less suitable for wildlife, including lighting; noise; increased human activity; pet, stray, or feral cats and dogs; other mesopredators; and invasive species.

Then [sic] primary mitigation strategy for offsetting impacts to local wildlife corridors is protection, enhancement, and management of the River Corridor SMA, High Country SMA, and Salt Creek area, together comprising approximately 6,300 acres of contiguous habitat. These areas were identified by Penrod et al. (2006) as important regional wildlife habitat linkages. Wildlife would be expected to use these areas to move across the landscape. In addition, because the Project would be phased over a period of up to 20 years, wildlife would be able to incrementally adjust their use of and movement in the Project vicinity over time. This large open space system will provide important resources to support wildlife, including perennial water sources, cover, refuge, foraging habitat, and resting areas.

The following sections identify the mitigation measures that would reduce general significant impacts to wildlife corridors to a level that would be adverse but not significant. Species-specific mitigation measures are discussed below in **Subsection 4.5.5.3.**"

(Draft EIS/EIR, pp. 4.5-588 through 4.5-589.) As indicated above, mountain lions were considered in the Draft EIS/EIR when assessing impacts to wildlife corridors.

In addition to the analysis of impacts to wildlife corridors, **Subsection 4.5.5.2.4.4**, Wildlife Crossings, evaluated Project-related impacts to the existing crossings that are primarily located under SR-126, linking the Santa Clara River Corridor through drainages to areas north of the Project area and the variable number of large bridge crossings of the Santa Clara River under the different alternatives. (**Subsection 4.5.5.2.4.3** addressed culvert and bridge crossings that would be constructed in the various tributary canyons within the Specific Plan area and their effects on movement by species in the different wildlife guilds.) That analysis found:

"Although impacts to wildlife crossings would not be significant and mitigation is not required, the protection of the River Corridor SMA, High Country SMA, and Salt Creek

area, as discussed above for wildlife corridors, would reduce the effects of constrained wildlife crossings in the Project area by providing alternative routes for movement. In addition, improvements and enhancement of the existing wildlife crossing under SR-126 west of the Project area at the base of Salt Creek (see BIO-19) will facilitate north-south movement. The requirement for downcast lighting adjacent to open space areas will reduce lighting impacts on wildlife using both unconstrained and constrained crossings." (Draft EIS/EIR, p. 4.5-596.)

For additional responsive information regarding the movement of wildlife, please refer to **Topical Response 12: Wildlife Habitat Connectivity, Corridors, and Crossings**.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

### **Response 10**

The comment states that the impact to the riparian habitat and narrowing of the Santa Clara River Corridor should be evaluated beyond the Project boundary in a quantitative manner. The comment also states that the natural habitat should be summarized and individually categorized by general vegetation type.

Methods that would be used to install the proposed bank stabilization along the Santa Clara River are described in Draft EIS/EIR **Subsection 2.6.4.1.1**, Bank Stabilization -- Santa Clara River. As described in that section, the proposed bank stabilization would generally be installed outside of or adjacent to the existing edge of riparian vegetation, and would not substantially narrow the width of the Santa Clara River corridor. (See, *e.g.*, Draft EIS/EIR, p. 2.0-78 ["The bank stabilization is designed and would be constructed to retain the Santa Clara River's significant riparian habitat, to allow the river to continue to function as a regional east-west wildlife corridor, and to provide flood protection pursuant to Los Angeles County standards."].) Please also see the U.S. Army Corps of Engineers' (Corps) draft 404(b)(1) alternatives analysis found in **Appendix F1.0** of the Final EIS/EIR.

Impacts to riparian habitat received extensive analysis in the Draft EIS/EIR, including **Section 4.2**, Geomorphology and Riparian Resources; **Section 4.5**, Biological Resources; and **Section 4.6**, Jurisdictional Waters and Streams. In these sections, it was determined that significant impacts to riparian resources located on and downstream of the Project site would be reduced to a less-than-significant level with the implementation of proposed mitigation measures. Please also see revised **Sections 4.2, 4.5, and 4.6** of the Final EIS/EIR.

The potential for the proposed Project to result in cumulative impacts to riparian resources was evaluated by the EIS/EIR in **Section 6.0**, Cumulative Impacts. The evaluation of cumulative impacts to riparian resources is provided in **Subsection 6.5.2**, Geomorphology and Riparian Resources; **Subsection 6.5.5**, Biological Resources; and **Subsection 6.5.6**, Jurisdictional Waters and Streams. Please also see revised **Section 6.0** of the Final EIS/EIR.

A quantitative estimate of potential cumulative impacts to riparian habitat is summarized in **Table 6.0-34**. The table indicates that there is estimated to be approximately 24,620 acres of various riparian habitat community types located in the Santa Clara River watershed. Per **Table 6.0-34**, the proposed Project

would result in permanent direct and indirect impacts to approximately 225 acres, and that the total impacted acreage in the watershed from present and reasonably foreseeable projects would be approximately 800 acres. Therefore, the cumulative impacts to riparian resources would have the potential to affect approximately 1,025 acres. Please also see revised **Section 6.0** of the Final EIS/EIR.

**Table 6.0-34** also identified the California GAP vegetation communities potentially subject to cumulative impacts. Those vegetation communities include mulefat scrub; permanently flooded lacustrine habitat; southern coast live oak riparian forest; southern cottonwood-willow riparian forest; southern sycamore/alder riparian woodland; southern willow scrub; big sagebrush scrub; and, southern alluvial fan scrub. Please also see revised **Section 6.0** of the Final EIS/EIR.

The cumulative impact analysis concluded that with the implementation of proposed mitigation measures, the Project's impacts to riparian resources would be less than cumulatively considerable. It also was concluded that if similar mitigation measures are applied to other projects in the Santa Clara River watershed, overall cumulative impacts to riparian resources would remain less than significant.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

#### **Response 11**

The comment suggests that the EIS/EIR should analyze the cumulative climate change impacts of the proposed Project. The Draft EIS/EIR contained an extensive project-level assessment of the proposed Project's impacts on global climate change in **Section 8.0**. In addition, **Section 6.0** addressed potential cumulative climate change impacts of the proposed Project. (See Draft EIS/EIR, **Subsection 6.5.21**, Global Climate Change, pp. 6.0-271-6.0-274.) Both project-level and cumulative impacts were found to be less than significant because the greenhouse gases attributable to the proposed Project would not impair the State of California's ability to return to 1990 emission levels by 2020, in accordance with Assembly Bill 32. Please also see revised **Sections 6.0** and **8.0** of the Final EIS/EIR. Because the comment does not raise any specific issue regarding that analysis, no more specific response can be provided. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

#### **Response 12**

The comment provides contact information for the letter's author. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is provided.