

California Native Plant Society
 Los Angeles/Santa Monica Mountains Chapter
 15811 Leadwell St.
 Van Nuys, CA 91406
 June 11, 2009

Dennis Bedford
 Calif. Dept. of Fish & Game
 4949 Viewridge Ave.
 San Diego, CA 92123

RE: Newhall Ranch EIR/EIS

Dear Mr. Bedford:

On behalf of the California Native Plant Society, Los Angeles/Santa Monica Mountains Chapter, I am writing to request a 120 day extension to the comment review period for the Newhall Ranch Resource Management and Development Plan and the Spineflower Conservation Plan. The California Native Plant Society (CNPS) is a non-profit organization of over 9,000 laypersons and professional botanists with 33 statewide chapters. Our mission is to increase the understanding and appreciation of California's native plants and to conserve them and their natural habitats through education, science, advocacy, horticulture and stewardship. 1

The proposed management plan is voluminous totaling thousands of pages, some of the data appear to be inconsistent and require further research, and our environmental and legal experts need more time to check the accuracy of the data. All of these are reasons to give the endangered Santa Clara River a more considered and intelligent hearing. 2

The area at issue is home to the San Fernando Valley spine flower and many other threatened and endangered species and is a major wildlife corridor and a rare valley oak woodland. If as you state "the Project would have significant and unavoidable impacts to the environment in specific areas, including among other environmental categories, biological resources, air quality, noise, agricultural resources, land use, visual resources, and solid waste," then 120 extra days is not too much to ask to avoid what could be a serious environmental mistake. 3

Newhall Land and Farming has not had a good environmental track record with its projects to date along the Santa Clara River. The many endangered species that they were supposed to protect have disappeared from the area, and some of their required mitigations have still not been completed. Let's not turn the Santa Clara into another Los Angeles River, but instead give it the protection it deserves as one of the County of Los Angeles' Significant Ecological Areas. 4

Sincerely



Snowdy Dodson
 Chapter President

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032. Letter from California Native Plant Society (Snowy Dodson), dated June 11, 2009

Response 1

This comment is an introduction to comments that follow. Please refer to **Response 2**, below, regarding the request for additional time to review the Draft EIS/EIR.

Response 2

The comment is a request for additional time to review the Draft EIS/EIR. In response to this and other requests, the U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) extended the comment period for the Draft EIS/EIR. Please refer to **Topical Response 1: EIS/EIR Public Review Opportunities**.

Response 3

This comment addresses general subject areas including the San Fernando Valley spineflower and other threatened and endangered species, wildlife corridors, and oak woodlands. The comment also summarizes the environmental issue areas identified by the Draft EIS/EIR in which the proposed Project or the alternatives would result in significant and unavoidable environmental impacts. Each of the issue areas identified by this comment received extensive analysis in the Draft EIS/EIR. The comment does not raise any specific issues regarding the adequacy of the analysis provided by the Draft EIS/EIR; therefore, no additional response is provided. Please refer to **Response 2**, above, regarding the request for additional time to review the Draft EIS/EIR.

Response 4

The comment asserts that The Newhall Land and Farming Company has not had a good environmental track record with its projects to date along the Santa Clara River. (It is assumed that the comment refers to the Natural River Management Plan (NRMP), as that is the applicant's primary permit along the Santa Clara River.) Because the NRMP has a 20-year build-out schedule, many of the contemplated projects will be constructed in the future. The mitigation measures are associated with and identified in each of the NRMP projects. Those measures are implemented only when the project to which they apply is actually initiated, which explains why some of the mitigation measures identified in the Mitigation Monitoring and Reporting Program (MMRP) have not yet been completed. However, the Corps and CDFG are satisfied that the NRMP mitigation program is functioning and progressing consistent with the terms of the MMRP and Incidental Take Permits. Please also see **Topical Response 3: Natural River Management Plan Projects and Mitigation**, for further responsive information.

With respect to the comment's assertion that endangered species have "disappeared" from the NRMP area, field data indicate that the MMRP and Incidental Take Permits are providing adequate protection for the endangered species. The specific findings of the NRMP field surveys include the following: (1) of the five threatened or endangered species covered under the section 2081 permit and the Biological Opinion, only the least Bell's vireo (LBV) and the fully protected unarmored three spine stickleback (UTS) were routinely observed in the NRMP site prior to project approval; and (2) these species continue to reside within the NRMP area. As documented in surveys through 2007, LBV have been consistently observed and documented in the riparian portions of the Santa Clara River downstream of Interstate 5 (I-5). These survey data are presented in **Appendix 4.5** of the Draft EIS/EIR. In addition, project surveys near the I-5

crossing of the Santa Clara River (both upstream towards the San Francisquito Creek and downstream towards the Valencia Water Reclamation Plant (WRP) outfall) have consistently shown the presence of UTS in recent years. (See Final EIS/EIR, **Appendix F4.5**, Compliance Biology, Inc. letter, dated March 18, 2010, providing compendia of special status species survey information within Santa Clarita and the Natural River Management Plan Area.)