

Animals on the Edge

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Ed Pert, Regional Manager
 California Department of Fish and Game
 South Coast Region
 4949 Viewridge Ave
 San Diego, CA 92123

March 8, 2010

RE: **Public Comment regarding the proposed Newhall Ranch Management and Development Plan Los Angeles County, California**

Dear Ed Pert:

This letter is in response to a draft that was re-circulated on February 1, 2010, that describes the proposed Newhall Ranch Management and Development plan for sections of the Santa Clara River and its adjacent tributaries in un-incorporated Los Angeles County near Santa Clarita. | 1

Although the Draft Environmental Impact Statement considered a total of six separate alternatives to satisfy EPA requirements, this homebuilder has chosen to stick with an inferior option that may result in permanent, adverse impacts to the last major wild river in Southern California. For this reason, Animals on the Edge opposes Alternative 2. | 2

The concerns you expressed in your September 1, 2009, letter to U.S. Army Corps of Engineers North Coast Branch Chief Aaron Allen echo ours. Potential impacts to aquatic resources of national importance should be avoided. For this reason, Animals on the Edge opposes Alternative 2. | 3

Shortly after the Santa Clara River was listed as one of America's most endangered river systems in 2005, my not-for-profit organization commissioned landscape photographer and professor Peter Goin to take evidential photographs of this vital ecosystem in all its stages. While this project remains work in progress, portfolios containing a total of 52 of these historic images were presented to the Los Angeles County Board of Supervisors and the Ventura County Board of Supervisors on March 2. The photographs, in larger-than-life form, will soon travel the nation in a major museum exhibition. | 4

Also be advised that some of the world's top wildlife photographers and historians define the Santa Clara River as being an important archaeological site. For this reason, Animals on the Edge opposes Alternative 2. In fact, international wildlife photographer Chris Weston is teaming with some of Southern California's leading biologists to document the many species of plants and animals on the river's frontline of extinction. Their findings will be the topic of our second *Animals on the Edge* book series. | 5

This dual photographic survey is designed to serve as a visual reminder of another American treasure we cannot afford to ignore or lose. At last count, as many as 38 species of threatened, endangered and rare plants, animals and micro-organisms inhabit the Santa Clara River, its watershed and tributaries. For this reason, Animals on the Edge opposes Alternative 2. | 6

Thank you for the opportunity to provide additional comments on the proposed Newhall Ranch Management and Development plan. We welcome an opportunity to work with you. If you wish to discuss this matter further, please feel free to contact me.

Sincerely,



Leo Grillo
 President

147. Letter from Animals on the Edge, dated March 8, 2010

Response 1

The comment is an introduction to comments that follow; however, this response provides clarification to some apparent points of confusion. The comment states that the letter responds to a recirculated draft on February 1, 2010. However, the Draft EIS/EIR for the proposed Project is not a recirculated document. The Draft EIS/EIR was made available for public review and comment, commencing on April 27, 2009 through August 25, 2009. Please see **Topical Response 1: EIS/EIR Public Review Opportunities** for more information about public review. The comment may be referring to a recirculated Draft EIR for the Landmark Village project within the approved Newhall Ranch Specific Plan. The lead agency for the Landmark Village EIR is the County of Los Angeles. The environmental impacts of the Newhall Ranch Specific Plan site were previously evaluated by the Newhall Ranch Specific Plan Program EIR and Final Additional Analysis for the Specific Plan and WRP, which was certified by the Los Angeles County Board of Supervisors on May 27, 2003. The Draft EIS/EIR also evaluates the effects of implementing the Newhall Ranch Specific Plan, which would be facilitated by the proposed Project.

Response 2

The comment states that the Draft EIS/EIR considered "six separate alternatives to satisfy" U.S. Environmental Protection Agency (USEPA) requirements and that "the homebuilder has chosen to stick with" Alternative 2, which the comment considers to be an inferior option. The comment also states opposition to Alternative 2.

To clarify, the Draft EIS/EIR considered seven alternatives, including a "no project" alternative (Alternative 1) and those alternatives are currently under consideration by the lead agencies, the U.S. Army Corps of Engineers (Corps) and the California Department of Fish and Game (CDFG). The Draft EIS/EIR analyzed the significant environmental impacts associated with the seven alternatives, and identified mitigation to reduce such impacts. Alternative 2 is the applicant's proposed Project. The lead agencies will independently assess all of the alternatives analyzed in the Draft EIS/EIR, including the applicant's proposed Project (Alternative 2); however, no final agency action has been taken with respect to any alternative at this time. Please also see the Corps' draft 404(b)(1) alternatives analysis found in **Appendix F1.0** of the Final EIS/EIR. 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 3

The comment refers to a letter from Ed Pert, South Coast Regional Manager, California Department of Fish and Game, dated September 1, 2009 to the U.S. Army Corps of Engineers, expressing concerns about Alternative 2. No such letter was sent by Mr. Pert.

Response 4

The comment refers to the activities of Animals on the Edge, photographs taken along the Santa Clara River, and portfolios containing a total of 52 photographs, which were presented to the Los Angeles County Board of Supervisors and Ventura County Board of Supervisors on March 2. The commentor did not provide the portfolio of photographs, and the comment does not address the content or adequacy of

the Draft EIS/EIR, therefore, no further response is provided. 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 refers to activities of Animals on the Edge and indicates that the Santa Clara River is an important archaeological site. The Draft EIS/EIR evaluated impacts to both historic and pre-historic archaeological resources in **Section 4.10**, Cultural Resources. The comment does not raise any specific issue regarding the analysis; therefore, 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 6

The comment refers to 38 species of threatened, endangered, and rare plant and animal species and microorganisms occupying the Santa Clara River. The comment also restates its opposition to Alternative 2.

Impacts to threatened, endangered, and other special-status species associated with the Santa Clara River, its tributaries, and upland habitats throughout the proposed Project site were analyzed in **Section 4.5**, Biological Resources, of the Draft EIS/EIR. In general, no microorganisms are considered special status, nor does the commentor identify any microorganism of concern. Impacts to water quality, which may affect aquatic microorganisms, were evaluated in **Section 4.4**, Water Quality of the Draft EIS/EIR. The comment does not address the content or adequacy of the Draft EIS/EIR; and, therefore, no further response will be provided. However, the comment will be provided to the decision makers prior to a final decision on the proposed Project.