August 3, 2009

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California Department of Fish and Game
Newhall Ranch EIS/EIR Project Comments
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TITLE
Newhall Ranch Resource Management and Development Plan (RMDP)
And the Spineflower Conservation Plan (SCP)

COMMENTS

My residence is in the San Fernando Valley and I haven't given the "Newhall Ranch Resource Management and Development Plan" for 21,000 homes along the Santa Clara River near Piru, California much attention. The same also applies to the "Spineflower Conservation Plan"; all of which applies to the "Newhall Ranch Specific Plan" area and the proposed development. I thought that the entire profit-making project was generally not accepted by the public and had died a natural death, as it should have. The long life of the project to date indicates weakness and general disapproval. Unfortunately it persists. Therefore I now submit several new comments concerning the project. 1

1. Water supplies.

California's water crisis is much worse now than it was five and ten years ago. Global Warming or other climatic problems exist causing thousands of acres of San Joaquin Valley to lose water, crop land, and crops. Also, the City of Los Angeles is now receiving less water from northern sources. As a result the city is restricting usage of 2

water by the city's departments and residents. However, the Newhall Land and Farm Project goes on as though there was no growing water crisis! If anything, the water crisis is worse for the project and Santa Clarita Valley than for Los Angeles. 2

2. Agricultural Production in California.

The drought in the San Joaquin Valley and elsewhere has caused great losses of agricultural production in the state. California, the principal state in the country in terms of agricultural production, has started to annually lose billions of dollars of income from this sector of the economy. Nevertheless, agricultural land, actual and potential, bordering the Santa Clara River at the location of the project stands to be developed and placed under buildings, concrete, and asphalt. The project may even end up polluting river water and harming some of the states most valuable farmlands located down river from the project all the way to the Oxnard Plains and Ventura Valley. 3 4 5

California also has the worse state debt and economy of any state in the country. Citizens lost much income and savings during 2008 and the project may soon be asking them to spend and buy in an isolated, remote area. 6

The almost continuous rich belt of agriculture serviced by the groundwater and rich soils of the Santa Clara River and its bordering lands have existed for decades from the Oxnard plains to Piru and beyond almost to U.S. Highway 5. Placing a town on the river in midst of the agricultural belt will not be good for agricultural production or the scenic quality of California. 7

3. Since year 2007, California has not needed 21,000 new homes in a new town. Foreclosures, bankruptcies, and losses of adequately paying jobs have resulted in a surplus of unoccupied homes; including new homes. Many developments of new tracts of homes in Santa Clarita Valleys remain uncompleted because of the recession, a sick economy, state and federal deficits, and long-term lack of demand for more new homes; not to mention job losses and lost personal wealth! 8

4. The Newhall Land and Farm project is bad for the environment, a species of Spineflower and other species of native plants and animals. One such species is the Black-tailed jackrabbit.

Years ago, I was a member of a group of people allowed on the land of the project by Newhall Land and Farm to examine natural features and conditions. I was surprised to discover jackrabbits on land proposed for the housing project.

Apparently the hares existed on the part of the project located near the river due to much relatively level and gently sloping open land supporting brush, grasses, and herbs. Steep slopes of the Santa Susana Mountains with woodlands located a short distance south of the project are not inhabited by jackrabbits. In fact, jackrabbits have never been observed by myself or associates on the steep slopes and their canyons in the middle and upper parts of the Santa Susana Mountain Range of Los Angeles County. Similarly, equivalent parts of the Santa Monica Mountains, San Gabriel Mountains, and Verdugo Mountains are also devoid of jackrabbits. Tongues of large valleys such as the San Fernando Valley extend into foothill canyons were formerly habitat for jackrabbits. However, for the most part those have been developed, and jackrabbits are now absent from them. The Newhall project bordering the river is an exception because the level and gently sloping land has yet to be developed. 9

Jackrabbits were formerly common in all the large valleys of southern California. I know because I observed the animals and liked to hunt them. Unfortunately the California Department of Fish and Game, the Army Corps of Engineers, and the United States Fish and Wildlife Service and the systems of state and county parks stood by doing nothing while the jackrabbits went extinct in the Santa Clarita Valley, San Fernando Valley, Los Angeles Basin, and the San Gabriel Valley. A few may continue to survive in the low hills and canyons on the northern side of the Simi Valley and in undeveloped locations in valleys east of San Gabriel Valley. The once hare-infested area of Cucamonga seems to now be devoid of jackrabbits.

During the decades following 1860, the large vineyards and wineries in Pasadena, San Gabriel Valley, San Bernardino Valley, and Cucamonga were severely troubled by jackrabbits. Much labor and money were spent to keep them out of vineyards and farm land. 9

Presently the question is – What will be the fate of the jackrabbits on and near the Newhall Ranch project? How far will the people of the Los Angeles greater area need to travel to see a common jackrabbit? Incidentally, the collapse of the noted populations of jackrabbits led to the disappearance of Golden eagles in the Los Angeles Basin and greater area.

5. The Newhall Ranch Project is planned and under consideration is a huge leapfrog development. Once completed it will be an urban town located in a riverside agricultural belt. Several miles to the east of the project the historic and famous Rancho Camulos, a Mexican land grant of the 1840s once thrived and subsisted on various types of agriculture. Its grapes, wines and brandy were avidly sought by travelers; particularly during the years of the Gold Rush. The Rancho's owner was an important person in the civic affairs of Los Angeles City. 10 11

To the west highly productive present day agriculture located parallel the Santa Clara River near the towns of Piru and Fillmore. If the project succeeds, other developments will in time occur on vacant land located up and down the sides of the river. Agriculture will be phased out. 12

6. People inhabiting the town potentially created by Newhall Ranch Development Plan will, for the most part, probably have employment at well paying jobs in distant cities. Each day many thousands of workers and their automobiles will be leaving or returning to the town from these cities. Jobs in the service sector of local small towns will not yield sufficiently high salaries and wages to meet monthly house payments and other necessary costs. All highways leading to big cities offering high wages will become more crowded with automobiles than they are at present. Traffic congestion was much 13 14

worse before the poor economy and recession. Traffic could become literally unbearable. The new town is not the answer to the needs and wishes of the people living in Santa Clarita Valley and neighboring areas. Traffic congestion is a major reason. 14

7. Species of Spineflower typically exist and colonize hot, dry, well drained open land supporting minimal amounts of competing vegetation. To more or less preserve San Fernando Valley Spineflower on the project site, an adequate acreage of such land on the site of the project needs to be reserved for the plant. Reserved land should not be altered by cultivating, bulldozing, irrigation, vegetation clearance, planting of any vegetation, reduction of sunlight or other disturbance of the soil and natural environment. Highest priority should be given to sites already colonized by Spineflower. Such areas should be fenced-off to prevent public access and usage. An employee should be assigned the tasks of monitoring the plants and maintaining their natural environment. After the town is situated alien plants and suffocating weeds could become a problem if not removed. 15

The Jepson manual of Higher Plants of California edited by Hickman, and A California Flora by Munz state that Chorizanthe parryi Wats exists in dry sandy places in Coastal Sage Scrub. I have observed both of these environmental aspects on the site of the planned community. Loose, sandy soil is common near the river and in shallow ravines leading to the river. Coastal Sage Scrub represented by stands of California sagebrush exist outside the Riparian Zone of the river, on the banks of shallow, sandy ravines, and on hillsides. Hillsides frequently have firm surfaced soil rather than loose sand. Firm soils tend to shed rather than absorb rainfall. Firmness is due to the presence of much clay. 16 17

120. Letter from Don P. Mullally, dated August 3, 2009

Response 1

The comment expresses an opinion and is an introduction to comments that follow. The U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) appreciate the comment. The commentor's opinion about the Newhall Ranch Specific Plan comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project. Because the comment expresses an opinion regarding the proposed Project and does not address the content or adequacy of the Draft EIS/EIR or raise an environmental issue, no additional response is provided.

Response 2

The comment questions whether adequate water supplies are available for the proposed Project. This issue received extensive analysis in Draft EIS/EIR **Section 4.3**, Water Resources. The analysis provided in that section concluded that adequate water supplies would be available to serve the proposed Project and alternatives. Please also refer to **Topical Response 7: Reliability of State and Local Water Supplies** for additional information regarding water supplies that would be used to serve the proposed Project.

In addition, Draft EIS/EIR **Section 8.0**, Global Climate Change, included **Appendix 8.0**, which surveyed and summarized existing literature, authored by the public and private sectors, addressing the intersection of global climate change and California's water resources. Particular attention was placed on the reports of California's Department of Water Resources. Based on the current state of science and the available modeling, the literature survey concluded that it would be speculative to assess the significance of global climate change on water resources. **Section 8.0** also appended a technical memorandum, authored by GSI Water Solutions, Inc., that addressed the potential effects of global climate change on groundwater supplies for the Newhall Ranch Specific Plan. That analysis concluded as follows:

> "The historical hydrograph records indicate that the groundwater resources in the western portion of the Santa Clarita Valley are relatively unaffected by local fluctuations in rainfall. Instead, as discussed in detail by CH2M HILL (2004) and CH2M HILL and LSCE (2005), the available data and groundwater modeling simulations indicate that rainfall fluctuations primarily affect groundwater levels and groundwater availability in the easternmost portion of the valley, where most of the recharge occurs to the Alluvial Aquifer. Consequently, if rainfall and groundwater recharge rates were to decline in the future because of climate change, these changes are likely to be fairly small as indicated by the various climatologic studies (discussed previously in this TM) that have been conducted by the various California state agencies involved in water resources management and planning. For this reason, and also because of the well-developed understanding to date of the valley's hydrology and its shallow and deep aquifer systems, it is anticipated that only minor fluctuations in groundwater levels will occur in the Alluvial Aquifer west of I-5, and that these fluctuations will not reduce the availability or sustainability of Alluvial Aquifer groundwater in this area."

The development enabled by approval of the proposed Project would employ a variety of water-efficiency techniques. Examples of relevant design features include the creation of water efficient landscapes through the use of native (or non-native and non-invasive) and drought-tolerant plant palettes; the use of weather-sensitive sprinklers; and the use of reclaimed/recycled water for landscape irrigation.

For further responsive information, please refer to revised **Section 8.0**, Global Climate Change, of the Final EIS/EIR, including revised appendices (**Appendix F8.0**); and **Topical Response 13: Global Climate Change Update**.

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

Response 3

The comment provides background information related to agricultural operations in the San Joaquin Valley and other locations in California, and the economic value of agricultural operations to the State. The comment makes reference to "the drought in the San Joaquin Valley". For a discussion of the reliability of State and local water supplies, please see **Topical Response 5: Water Litigation and Regulatory Action Update**, **Topical Response 8: Groundwater Supplies and Overdraft Claims**; and **Topical Response 9: State Water Project Supply Reliability**. The Corps and CDFG appreciate the commentor's opinion regarding agricultural production in California. The comment does not address the adequacy of the environmental review provided in the Draft EIS/EIR, but will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 4

The comment addresses the issue of taking agricultural lands located on the Project site out of production. The impact of the proposed Project on agricultural resources received extensive analysis in the Draft EIS/EIR **Section 4.12**, Agricultural Resources. The analysis provided in that section does conclude that, even with the implementation of feasible mitigation measures, infrastructure provided by the Project and urban development on the Project site facilitated by the new infrastructure would result in significant and unavoidable project-specific and cumulative impacts associated with the loss of agricultural soils that have been classified as prime, unique and statewide importance. In addition, for further responsive information, please see revised **Section 4.12** of the Final EIS/EIR. The comment discusses topics covered in the Draft EIS/EIR, but does not raise any specific issues regarding the analysis provided in the Draft EIS/EIR; therefore, no additional 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 indicates that the proposed Project may result in significant off-site water quality impacts to farmlands located downstream from the Project site. Potential water quality impacts of the proposed Project received extensive analysis in Draft EIS/EIR **Section 4.4**, Water Quality. The analysis provided in that section concluded that with the implementation of feasible mitigation measures, the Project's on- and off-site water quality impacts would be reduced to a less-than-significant level, both on a project-specific and cumulative basis. In addition, for further responsive information, please see revised **Section 4.4** of the Final EIS/EIR. The comment does not raise any specific issues regarding the analysis provided by the Draft EIS/EIR; therefore, no additional response is provided. However, the comment will be

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

Response 6

The comment states that California has the worse debt and economy of any state in the country, and indicates that the proposed Project may ask California residents to spend and buy in an isolated, remote area. The comment raises economic, social or political issues that do not relate to any physical effect on the environment. (See Cal. Code Regs., tit. 14, §15131, subd. (c) ["Economic or social effects of a project shall not be treated as significant effects on the environment."].) The characterization of the development that would be enabled by approval of the proposed Project as in an "isolated, remote area" is not accurate. The Project site is located in the immediate vicinity of major transportation corridors, and development on the site would result in a mixed-use community comprised of residential, retail, commercial and industrial land uses. 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 7

The comment addresses general concerns related to the Project's impacts to agricultural resources and visual/aesthetic conditions. Both of these environmental issue areas received extensive analysis in Draft EIS/EIR, including **Section 4.12**, Agricultural Resources; and **Section 4.15**, Visual Resources. The analysis of impacts to agricultural resources concluded that the Project-related loss of on-site agricultural soils would result in a significant and unavoidable impact; however, the Project would not result in significant impacts to agricultural resources or operations located *off* of the Project site. The analysis of the Project's impacts to visual resources concluded that the proposed Project would result in significant and unavoidable direct impacts associated with the construction of new bridges across the Santa Clara River, and significant and unavoidable indirect impacts resulting from the build-out of the previously approved Newhall Ranch Specific Plan. In addition, for further responsive information, please see revised **Section 4.12** of the Final EIS/EIR. The comment does not raise any specific issues regarding the analysis provided by the Draft EIS/EIR; therefore, no additional response is provided. However, the comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 8

The comment states that there is no longer any demand for the land use development contemplated by the previously adopted Newhall Ranch Specific Plan due to the current economic crisis. The comment raises economic, social or political issues, which do not relate to any physical effect on the environment. For the purposes of CEQA, economic or social effects of a project shall not be treated as significant effects on the environment. (See Cal. Code Regs., tit. 14, §15131, subd. (c) ["Economic or social effects of a project shall not be treated as significant effects on the environment."].) The Corps and CDFG appreciate the commentor's opinion regarding demand for housing. The comment will be included as part of the record and made available to 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 indicates that the propose Project would adversely affect the environment, San Fernando Valley spineflower and other native species, and discusses the black-tailed jackrabbit as an example of an adversely affected native species. The commentor provides anecdotal information and observations about the black-tailed jackrabbit as supporting evidence for this statement, including reports from others of observations of jackrabbits in the flatter and gently sloping terrain in the Project area. The commentor also asserts that this formerly common species is now extinct in the Santa Clarita Valley, San Fernando Valley, Los Angeles Basin, and San Gabriel Valley (although the commentor acknowledges that a few may occur in the Simi Valley and undeveloped locations east of the San Gabriel Valley). The commentor asks what will happen to jackrabbits on and near Newhall Ranch. The commentor also attributes the disappearance of golden eagles in the Los Angeles Basin and greater area to a collapse of the jackrabbit population.

The commentor noted the black-tailed jackrabbit has not been observed on the steep slopes of the Santa Susana Mountains and is primarily found within areas supporting less complex topography. In addition, the commentor asserts that the species is extinct in the Los Angeles Basin and the San Gabriel Valley. The black-tailed jackrabbit does occupy many diverse habitats, but the species is more commonly found in arid regions supporting short-grass habitats or open scrub communities. Black-tailed jackrabbits are common in grasslands that are overgrazed by cattle, and they are well adapted to using low-intensity agricultural habitats (Lechleitner 1959). This behavior is consistent with the low number of recorded observations within the foothills and mountainous areas described by the commentor.

The commentor also indicated that regulatory agencies and local governments have not acted to prevent the decline of this species. CDFG monitors threats to this species and is aware that coastal populations of black-tailed jackrabbit have declined with urbanization. The black-tailed jackrabbit has not gone extinct in the Santa Clarita Valley, San Fernando Valley, Los Angeles Basin, and San Gabriel Valley; however, populations of this species, which were once more widespread, have declined, and in some areas, local populations have been extirpated. To this effect, it is the goal and responsibility of the CDFG to maintain viable populations of all native species. CDFG has designated certain vertebrate species as "Species of Special Concern" because declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction. The subspecies San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), which is likely the subspecies occurring in the Project area (Impact Sciences 2005), has been designated a "Species of Special Concern" by CDFG (CDFG 2008C). The goal of designating species as "Species of Special Concern" is to halt or reverse their decline by calling attention to their plight and addressing the issues of concern early enough to secure their long-term viability. Not all "Species of Special Concern" have declined equally; some species may be just starting to decline, while others may have already reached the point where they meet the criteria for listing as a "Threatened" or "Endangered" species under the California or Federal Endangered Species Acts.

Another concern raised by the commentor is how the proposed Project or alternatives will affect this species and that the proposed mitigation is not possible. The black-tailed jackrabbit is known to occur in the Project area and was observed by Impact Sciences on the proposed Project site in 2005 (Impact Sciences 2005). This species was also observed southeast of Castaic Lake less than a mile west of San Francisquito Creek in 2005 (CDFG 2007A). In order to evaluate potential effects to this species, **Subsection 4.5.5.3**, Impacts to Special-Status Species, of the Draft EIS/EIR presented information on the life history, ecology, and potential for black-tailed jackrabbits to occur in the Project area. The Draft

EIS/EIR described the existing threats to black-tailed jackrabbits, their known/expected range, and evaluated how construction of the proposed Project would affect this species and its habitat. The Draft EIS/EIR concluded that impacts to San Diego black-tailed jackrabbit, including habitat loss, impacts to individuals, and secondary impacts, would be significant absent mitigation. The Draft EIS/EIR identified feasible mitigation measures (including Mitigation Measures SP-4.6-1 through SP-4.6-16, SP-4.6-18, SP-4.6-19, SP-4.6-21 through SP-4.6-27, SP-4.6-36 through SP-4.6-42, SP-4.6-63, BIO-1 through BIO-16, and BIO-19 through BIO-21) that would result in a large, permanent open space system that would conserve habitat for this species. This open space will be conserved in three main interconnected areas: the River Corridor Special Management Area (SMA), the High Country SMA, and the Salt Creek area (**Figure 4.5-3**). The analysis in the Draft EIS/EIR then concluded that, with mitigation, impacts to this species would be less than significant for Alternatives 2 through 7. The commentor also suggested that the reduction of black-tailed jackrabbits in the Los Angeles basin and other developed areas has led to the decline of golden eagle populations. CDFG currently tracks the threats and status of golden eagles, and this species is designated as Fully Protected by the State of California under Fish & Game Code section 3511. The decline of golden eagle populations has occurred for a variety of reasons, including the widespread conversion of foraging habitat, urbanization, and human disturbance of nest sites. **Subsection 4.5.5.3**, Impacts to Special-Status Species, of the Draft EIS/EIR presented information regarding the status, threats, and ecology of golden eagles. While this species is known to forage on black-tailed jackrabbits, golden eagles prey on a variety of species, including other rabbits, hares, and squirrels, and it will also feed on reptiles, birds, and sometimes carrion (Olendorff 1976; Johnsgard 1990). This species was detected within the High Country SMA and is expected to forage in the proposed Project area. Analysis in the Draft EIS/EIR concluded that impacts to golden eagles and their foraging habitat would be mitigated to less-than-significant levels for Alternatives 2 through 7 (**Subsection 4.5.5.3**, Impacts to Special-Status Species, of the Draft EIS/EIR). In addition, for further responsive information, please see revised **Section 4.5** of the Final EIS/EIR, and 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.

Response 10

The comment states that the Newhall Ranch Specific Plan is a "leapfrog development." The term "leapfrog development" is used to describe a development project that skips over land located adjacent to urban or other developed areas, and instead is located in an outlying area. When this occurs, urban infrastructure required to serve the new development, such as roads, sewer and water lines, must be extended from the existing urbanized area across undeveloped land. This type of development pattern is often considered to be "growth inducing" because infrastructure extensions required to serve the new development may also facilitate the development of properties located between the existing urban area and the new development site.

The proposed Project is adjacent to urbanized areas located to the east and northeast, including development that has occurred adjacent to the I-5 corridor and the previously developed portions of the Valencia Commerce Center adjacent to SR-126. In addition, infrastructure required to serve the Project site would not be extended across any intervening undeveloped areas. Therefore, the proposed Project would not result in "leapfrog development."

The Corps and CDFG appreciate the commentor's opinion about the Newhall Ranch Specific Plan. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 11

The comment provides background information related to historical agricultural operations in the Project region. As indicated by this comment, a small portion (approximately 40 acres) of the larger Rancho Camulos Ranch site is a designated historical landmark, located over two miles east of Piru, California. Due to the distance that geographically separates the Rancho Camulos and the Project site, the proposed Project would not result in any significant impacts to Rancho Camulos. The Corps and CDFG appreciate the information provided by the commentor. Because the comment does not address the adequacy of the environmental review provided by the Draft EIS/EIR, no further response is provided. The comment will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 12

The comment expresses opinions regarding development patterns that may occur in the Project region if the proposed Project is approved, and states that such development would phase out agricultural uses. The Draft EIS/EIR **Section 4.12**, Agricultural Resources, concluded that the Project-related loss of on-site agricultural soils would result in a significant and unavoidable impact; however, the Project would not result in significant impacts to agricultural resources or operations located *off* of the Project site. The Draft EIR, **Section 7.0**, Significant Irreversible Changes, Growth Inducing Impacts, and Federal Impact Considerations, also discussed the growth inducing effects of the proposed Project and alternatives. (See Draft EIS/EIR, **Section 7.0**, pages 7.0-1-7.0-8. The Corps and CDFG appreciate the commentor's opinion about the future of agricultural uses in the region. Because the comment expresses an opinion regarding the Project and does not address the content of the Draft EIS/EIR, no additional response is provided. The opinion regarding the proposed Project will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

Response 13

The comment expresses opinions regarding regional employment characteristics that would result should the proposed Project be approved. One of the objectives of the RMDP and SCP is to facilitate the development of the Newhall Ranch Specific Plan, and an objective of the Specific Plan is to meet the regional demand for housing and jobs. The demand for jobs created by the development of the Specific Plan would be partially met with the build-out of the Valencia Commerce Center portion of the proposed RMDP/SCP Project, and by new commercial development that would be provided on the Specific Plan and Entrada project sites. Because the comment does not address the content or adequacy of the Draft EIS/EIR, no additional response is provided. However, the opinion regarding the proposed Project will be included as part of the record and made available to decision makers prior to a final decision on the Project.

Response 14

The comment addresses concerns related to Project-related commute patterns and resulting impacts to the regional highway system. Traffic impacts of the proposed Project received extensive analysis in Draft

EIS/EIR **Section 4.8**, Traffic. That analysis concluded that impacts of the proposed Project could be reduced to a less-than-significant level with the implementation of proposed mitigation measures. Please also see **Topical Response 10: Vehicle Trip Distribution Methodology** in the Final EIS/EIR, and revised **Section 4.8**, Traffic, including revised appendices (Final EIS/EIR, **Appendix F4.8**). 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 15

The comment describes typical habitat for spineflower species and suggests that San Fernando Valley spineflower (spineflower) preserves should not be altered by disturbance, including cultivation, bulldozing, vegetation clearance, irrigation, and planting of vegetation, reduction of sunlight, or other disturbances. The comment suggests that spineflower preserves should be fenced off and monitored. The comment states that adequate acreage of appropriate habitat should be preserved for spineflower and that alien plants could become a problem for spineflower.

Spineflower is a state-listed endangered species that occurs on the proposed Project site. The Draft EIS/EIR evaluates the direct impacts of implementing the applicant's proposed Spineflower Conservation Plan (SCP) in the context of the applicant's proposed development plan and a range of alternative development plans. The proposed Project (Alternative 2) would set aside 68.6 percent of cumulative occupied spineflower habitat occurring on the proposed Project site within a series of five spineflower preserves, to be managed in accordance with the SCP. Other alternatives (Alternatives 3 through 7) analyzed in the Draft EIS/EIR would set aside higher proportions of spineflower cumulative occupied habitat in preserves. Project impacts to spineflower and mitigation strategy are summarized in **Subsection 4.5.5.3** of the Draft EIS/EIR, and Section 8.0 of the Draft SCP includes a description of the proposed spineflower preserves under Alternative 2, the applicant's proposed Project, describing vegetation, soils, geology, slope, aspect, and elevation for each preserve.

San Fernando Valley spineflower habitat within proposed spineflower preserves would be managed and maintained to preserve spineflower, as described in the revised SCP (Dudek 2010). Preserve management activities are discussed below. Southern California Edison (SCE) would continue to conduct routine and ongoing maintenance activities under the terms of its existing easement in the Entrada preserve. Examples of utility maintenance activities include vehicle access, minor grading to maintain the access road, and periodic cleaning of towers and power lines. No shade structures or other features that would reduce sunlight are proposed.

Vegetation clearing would not be permitted within spineflower preserves, with the exception of habitat management activities (see **Subsection 4.5.5.3** of the Draft EIS/EIR on page 4.5-1746), and SCE routine and ongoing maintenance activities. As the commentor notes, control of invasive alien plants will likely be necessary. Weed control would be implemented for the purpose of improving spineflower habitat. Invasive weeds (mainly Eurasian grasses and herbs) cover much of the available habitat within proposed spineflower preserves. Detrimental effects of these invasive plants to rare native plants are well documented for numerous other species and are a primary threat to spineflower within the proposed preserves at the proposed Project site. Weed control would be an essential management activity in the spineflower preserves. The SCP (see Subsection 9.2.10 of the revised SCP, and Appendix E of the revised

SCP) directs spineflower preserve managers to evaluate several methods of weed control, including herbicide use. (A copy of the revised SCP is found in Final EIS/EIR, **Appendix F1.0**.)

Fencing would be installed along the outside edge of spineflower preserves where adjacent to proposed development (see **Subsection 4.5.5.3** of the Draft EIS/EIR on page 4.5-1747).

Regarding irrigation in proximity to spineflower preserves, mitigation measures described in **Subsection 4.5.5.3** of the Draft EIS/EIR on page 4.5-1748 require that pre-development hydrology conditions must be maintained in the spineflower preserves, and irrigation of manufactured slopes adjacent to spineflower preserves must be temporary and must be designed so that the pre-development hydrology of the spineflower preserves is not altered. Regarding long-term monitoring and management of spineflower preserves, a spineflower preserve manager would be contracted and funded to ensure the long-term monitoring and management activities are carried out (see **Subsection 4.5.5.3** of the Draft EIS/EIR on page 4.5-1741; and Section 12.0, Funding, of the revised SCP).

Regarding the preservation of adequate habitat for the spineflower, as described in **Subsection 4.5.5.3** of the Draft EIS/EIR on page 4.5-1741, 68.6 percent of the known spineflower cumulative occupied area would be preserved and managed on site under Alternative 2; however, analysis in the Draft EIS/EIR concluded that impacts to spineflower would be significant and unavoidable under Alternative 2. Alternatives 3 through 7 would set aside higher proportions of spineflower cumulative occupied habitat: Alternative 3 would set aside 77.5 percent; Alternative 4 would set aside 82.5 percent; Alternative 5 would set aside 84.2 percent, Alternative 6 would set aside 88.5 percent; Alternative 7 would set aside 98.2 percent. Analysis in the Draft EIS/EIR concluded that impacts to spineflower would be less than significant with mitigation under Alternatives 3 through 7. In addition, Section 8.0 of the Draft SCP includes a description of the proposed spineflower preserves for the proposed Project, describing the following spineflower ecological indicators for each proposed preserve: vegetation, soils, geology, slope, aspect, and elevation.

In addition, for further responsive information, please refer to the revised Spineflower Conservation Plan found in **Appendix F1.0** the Final EIS/EIR.

Responses 16 and 17

The comment cites descriptions of *Chorizanthe parryi* habitat published in regional floras and notes that both "dry sandy places" and "coastal sage scrub" occur on the proposed Project site. Furthermore, the comment provides brief descriptions of wash and upland soils.

The species *Chorizanthe parryi* includes two varieties, *C. parryi* var. *parryi* and var. *fernandina* (Parry's spineflower and San Fernando Valley spineflower, respectively). The habitat description quoted in the comment is from Munz's *A California Flora* (1959, p. 329) and his *Flora of Southern California* (1974, p. 673). In both books, this description applies to *C. parryi* var. *parryi* (Parry's spineflower), a close relative of San Fernando spineflower; Parry's spineflower is not known from the Santa Clarita Valley area. Munz did not provide a habitat description more specific to San Fernando Valley spineflower. Similarly, the *Jepson Manual* (Hickman 1993, p. 859) describes *Chorizanthe parryi* habitat as "sandy places, gen[erally] in coastal or desert scrub." The *Jepson Manual* does not provide more specific habitat description of San Fernando Valley spineflower except to say, "habitat of sp[ecies]."

Section 4.6 of the Draft SCP, pages 21 through 22, describes San Fernando Valley spineflower habitat at Laskey Mesa and Newhall Ranch (the two known extant locations). spineflower is associated with a variety of soil types, including but not limited to sandy and gravelly silt and clay loams. Furthermore, the Draft SCP summarizes all information on spineflower habitat available in December 2007 when it was prepared. This information includes sources cited by the commentor (above) and numerous, more recent reports, including work contracted by the Ahmanson Land Company and Newhall Land and Farming Company. All of these information sources are cited in Section 18 of the Draft SCP. Analysis in the Draft EIS/EIR considered the habitat requirements for spineflower (var. *fernandina)*, which cannot be assumed to be identical to the spineflower variety (var. *parryi*) identified in the comment.

During fieldwork for the Draft EIS/EIR, botanists surveyed upland and wash habitats throughout the proposed Project area for spineflower and other special-status plants (see **Subsection 4.5.3.2**, Methods, of the Draft EIS/EIR). spineflower was found only at the locations mapped in the Draft EIS/EIR (see **Figures 4.5-25 through 4.5-30**) and found at those locations in multiple surveys conducted from 2002 to 2007. Field surveys for spineflower and other special-status plants as described in the Draft EIS/EIR provide an adequate basis for evaluating project impacts to spineflower, and to identify appropriate mitigation for those impacts.

In addition, for further responsive information, please refer to the revised Spineflower Conservation Plan found in **Appendix F1.0** the Final EIS/EIR.