

**From:** <Madroneweb@aol.com>  
**To:** aaron.o.allen@usace.army.mil; NEWHALLRANCH@dfg.ca.gov  
**Date:** Tue, Aug 25, 2009 11:58 PM  
**Subject:** Comments on Newhall Ranch Res. Mgt & Dev Plan & Spineflower Cons. Plan DEIR/DEIS

August 25th, 2009

Bruce Campbell  
1158 26th St. # 883  
Santa Monica, CA 90403

California Department of Fish and Game  
Newhall Ranch EIS/EIR Project Comments  
c/o Dennis Bedford  
4949 Viewridge Avenue  
San Diego, CA 92123

U.S. Army Corps of Engineers  
Ventura Field Office  
Attn: Aaron O. Allen  
2151 Alessandro Drive, Suite 110  
Ventura, CA 93001

Re: Newhall Ranch RMDP & Spineflower Conservation DEIR/DEIS

Dear Dennis Bedford, Aaron O. Allen, and to whom it may concern:

These are my comments on the Newhall Ranch Resource Management and Development Plan (RMDP) and the Spineflower Conservation Plan (SCP).

I support the No Project / No Build alternative -- Alternative # 1 -- for a variety of reasons. Many of these reasons pertain to water. | 1

A. I don't believe that the numerical calculations of the massive document are valid partially due to failure to take into account the basic fact that water for agricultural lands tends to go into the soil and infiltrate to an aquifer, while comparatively little water which is to be diverted to urban uses from current agricultural use (within the proposed area under the build alternatives which would be cluttered with channelized streams and run-off ditches) would infiltrate into a local aquifer. | 2

B. There should have been a more serious examination of the impacts of global climate change in the documents. One impact of global and regional climate change is that during drought years, there would be inadequate quantities of water to supply the burgeoning suburbs of the Santa Clara River Valley, and those residents would feel at least as entitled to local water as those who would move into a to be more heavily developed Newhall Ranch area. | 3

C. Some other water concerns are the current overpumping of both the alluvial aquifer below the Santa Clara River as well as the deeper underlying aquifer in the Saugus formation, while similar quantities are predicted to continue to be pumped to quench the thirst of as many as 60 to 70,000 new residents under the Newhall Ranch project. | 4

D. There will clearly be a significant decrease in the quality of | 5

riparian habitat which will not only be especially difficult for amphibians, but also for rare anadromous fish such as the southern Steelhead (oncorhynchus mykiss). 5

E. There is an appalling concentration of so-called bank stabilization activities and drainage channel construction even within the floodplain of the Santa Clara River at Newhall Ranch proposed under the project alternatives. The transition or buffer habitat surrounding the river will be vastly altered which limits not only migration along watercourses or wildlife corridors, but disrupts the food chain of the region thus impacting several Los Angeles County-designated Significant Ecological Areas including most directly the Santa Clara River SEA and would be a roadblock to the flow of species from the Santa Susana Mountains SEA along and across the Santa Clara River and to other hilly uplands. 6

F. The massive amount of disruption of natural habitat and plumbing systems shown in Table 4.12-4 of the RMDP-SCP EIS/EIR in discussion of Alternative # 2 is absolutely appalling. Buffer area species will suffer, there will be very little infiltration of water used at the project to the aquifer, and there will be lots of higher velocity runoff \*(not infrequently tainted by household or yard chemicals) pouring into the Santa Clara River during rainy periods and perhaps some other occasions bringing a considerable reduction in water quality. 7

\*\*\*\*\*  
\*\*\*\*\*

Pertaining to Point D above, I hereby urge that the Final RMDP-SCP EIS / EIR carefully go through the 8 primary reasons for decline of southern steelhead trout populations and evaluate how each Newhall Ranch alternative could impact the habitat of various listed and resident species in the Santa Clara River watershed. Those 8 principal threats are alteration of natural stream flow patterns (Alt. # 1 avoids this), physical impediments to fish passage, alteration of floodplains and channels, increased sedimentation, discharges of waste, loss of estuarine habitat, and stocking of hatchery fish interfering with the life cycle of steelhead. Clearly, the project alternatives alter natural stream flow patterns, alter floodplains and channels, and increase sedimentation as well as discharges of waste and runoff. The sedimentation could be quite severe due to the massive so-called "bank stabilization" activities. Please thoroughly discuss the approximate amount of fill dirt that would be used under each project alternative, and if there will not be much imported fill or dirt, then I assume that the banks the project seeks to build and be stable will essentially be lopped off sections of hillsides now concentrated and with hopes to stabilize in banks so as to build many housing units on top of them. What makes the project proponents think such banks could survive rainstorms, let alone El Nino type storms or particularly severe storms. Clearly, this last major wild river in southern California -- the Santa Clara River -- must not deteriorate further in habitat value for southern steelhead so that it has a chance to recover its struggling population. 8  
9  
10  
11

\*\*\*\*\*  
\*\*\*\*\*

Now in reference to Point E, certainly there would be severe cumulative impacts (if project alternatives were carried out at Newhall Ranch) for those who live in or near the Santa Clara River which is the last major natural river in southern California and whose riparian woodlands must be protected since there is a mere few percent of such habitats still fairly intact 12

since those of European descent took over most of the state. Due to the reduced value of using the Santa Clara River as a corridor if there is so much more access by offroad vehicles, bicycles, domestic animals, and massive development and related runoff, there will be impacts on species in upstream SEAs, but the Santa Clara River SEA itself, as well as the Santa Susana Mountains SEA species will be impacted. NO INTERIOR HABITAT is included for the Santa Clara River riparian area under any project alternative. Need I remind you folks that the L.A. County General Plan clearly states that development proposals near SEAs must be highly compatible with the biotic resources of the area.

12  
13  
14

Lastly, if golf courses are to proceed related to some of the developments of some of the project alternatives, please evaluate the impact on water supplies and its contribution to chemical runoff into the vital Santa Clara River watercourse (specifically look for 2,4-D, atrazine, Roundup formulations, etc.)

15

Sincerely yours,  
  
Bruce Campbell

**126. Letter from Bruce Campbell, dated August 25, 2009**

---

**Response 1**

The U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) appreciate the comment provided. The opinion providing support for Alternative 1 and the introductory comments regarding water issues 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 Project and does not address the content or adequacy of the Draft EIS/EIR, no additional response is provided.

**Response 2**

The comment appears to refer to the analysis of the Project's impacts on groundwater recharge. This topic received extensive analysis in **Section 4.3**, Water Resources, of the Draft EIS/EIR. For example, the evaluation of the Project's impacts on groundwater supplies and groundwater recharge, provided on page 4.3-86 of the Draft EIS/EIR states, in part:

"Groundwater recharge would not be substantially impacted by the water demands based on the best available information. This information shows that no adverse impacts on Basin recharge have occurred or would occur due to the existing or projected use of local groundwater supplies. Based on a memorandum prepared by CH2MHill (Effect of Urbanization on Aquifer Recharge in the Santa Clarita Valley, February 22, 2004; see **Appendix 4.3**), no significant impacts would occur to the groundwater basin with respect to aquifer recharge. Urbanization in the Santa Clarita Valley has been accompanied by long-term stability in pumping and groundwater levels and the addition of imported SWP water to the Valley; together, these actions have not reduced recharge to groundwater, nor depleted the amount or level of groundwater in storage within the local groundwater basin. These findings are also consistent with the CLWA/purveyor groundwater operating plan for the Basin (see EIS/EIR, **Appendix 4.3**, 2005 Basin Yield Report)."

Additional analysis of potential groundwater recharge impacts also is provided, including the following text from page 4.3-87 of the Draft EIS/EIR:

"Currently, portions of the Specific Plan area are irrigated agricultural land. Some of these areas would be developed for the proposed Project, introducing impervious surface over approximately 30 percent of the Project area. The reduction in irrigated agriculture and the increase in paved area would reduce overall recharge; however, several factors would serve to counter the impact of urbanization on groundwater recharge within the Specific Plan area:

- Development within the Specific Plan area would increase runoff volume discharged after treatment (*e.g.*, in water quality control facilities) to the Santa Clara River, whose channel is predominantly natural and consists of vegetation and coarse-grained sediments. The porous nature of the sands and gravels forming the streambed allows for significant infiltration to occur to the Alluvial aquifer underlying the Santa Clara River;

- Development of the Specific Plan area would significantly increase the area of irrigated landscaping on currently undeveloped land, which would serve to increase the amount of recharge to the area; and
- The groundwater supply for the Specific Plan post-development would not require an increase in groundwater pumping beyond the applicant's existing agricultural allocation (7,038 afy).
- In addition, irrigation used in the Project area would increase the amount of recharge available to the Santa Clara River.

Based on the above information, the Specific Plan impacts on groundwater recharge and levels would be less than significant relative to Significance Criterion 1."

Based on the analysis of potential groundwater recharge impacts summarized above and other analysis provided in **Section 4.3** of the Draft EIS/EIR, it was concluded that the proposed Project and alternatives would not result in significant impacts to groundwater levels in the Project area. Additional information regarding the Project's groundwater recharge-related impacts is provided in **Topical Response 8: Groundwater Supplies and Overdraft Claims**; and **Topical Response 9: State Water Project Supply Reliability** of the Final EIS/EIR. The comment does not provide any evidence to suggest that the analysis in the Draft EIS/EIR is inaccurate. In addition, for further responsive information, please see revised **Section 4.3** of the Final EIS/EIR. The Corps and CDFG appreciate the commentor's opinion about groundwater recharge. 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 states that the Draft EIS/EIR should have included a more serious examination of the impacts of global climate change. It further states that the effects of global climate change on water resources during drought years were not thoroughly analyzed. The Draft EIS/EIR, **Section 8.0**, Global Climate Change, acknowledges that global climate change could "alter the seasonal pattern of snow accumulation and snowmelt and threaten the availability of water." (Draft EIS/EIR, p. 8.0-28.) **Section 8.0** is accompanied by an appendix that summarizes available literature addressing the projected impacts of global climate change on California's water supplies. That literature survey concludes, consistent with Public Resources Code, title 14, section 15145, that it is not possible to reasonably forecast regional and local impacts to water supplies at this time due to modeling deficiencies and the inability to predict regionally specific effects of climate change. Please refer to **Topical Response 9: State Water Project Supply Reliability**, regarding impacts to water supplies due to climate change. In addition, please see **Topical Response 13: Global Climate Change Update**, and revised **Section 8.0**, Global Climate Change, of the Final EIS/EIR, including the revised appendices (Final EIS/EIR, **Appendix F8.0**). . In addition, please refer to revised **Section 8.0**, Global Climate Change, of the Final EIS/EIR, including the revised appendices (Final EIS/EIR, **Appendix F8.0**). The Corps and CDFG appreciate the commentor's opinion about the level of detail in the analysis of climate change in the 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 4

The comment states that the groundwater aquifers in the vicinity of the Project site are currently being over-pumped. To clarify, the aquifers are not being over-pumped, see below for further explanation. This issue was analyzed in the Draft EIS/EIR, **Section 4.3**, Water Resources. **Subsection 4.3.4.4**, Description of Groundwater Supplies, provides information regarding the existing condition of the Santa Clara River Valley Groundwater Basin, East Subbasin, which is comprised of two aquifer systems -- the Alluvium (also referred to as the Alluvial aquifer) and the Saugus Formation.

With respect to the Alluvial aquifer:

**"Adequacy of Supply.** For municipal water supply, with existing wells and pumps, the three retail water purveyors with Alluvial wells (NCWD, SCWD and VWC) have a combined pumping capacity from active wells (not contaminated by perchlorate) of 36,120 gpm, which translates into a current full-time Alluvial source capacity of approximately 58,000 afy.<sup>21</sup> This is more than sufficient to meet the municipal (or urban) component of groundwater supply from the Alluvium, which is currently 20,000 to 25,000 afy of the total planned Alluvial pumping of 30,000 to 40,000 afy.

Simulated Alluvial aquifer response to the range of hydrologic conditions and pumping stresses is essentially a long-term repeat of the historical conditions that have resulted from similar pumping over the last several decades. The resultant response consists of: (1) generally constant groundwater levels in the middle to western portion of the Alluvium and fluctuating groundwater levels in the eastern portion as a function of wet and dry hydrologic conditions; (2) variations in recharge that directly correlate with wet and dry hydrologic conditions; and (3) no long-term decline in groundwater levels or storage. The Alluvial aquifer is considered a sustainable water supply source to meet the Alluvial portion of the operating plan for the Basin. This is based on the combination of actual experience with Alluvial aquifer pumping at capacities similar to those planned for the future and the resultant sustainability (recharge) of groundwater levels and storage, and further based on modeled projections of aquifer response to planned pumping rates that also show no depletion of groundwater."

(Draft EIS/EIR, pp. 4.3-36, 4.3-39.)

With respect to the Saugus Formation:

"In terms of adequacy and availability, the combined active Saugus groundwater source capacity of municipal wells of 24,000 afy, is more than sufficient to meet the planned use of Saugus groundwater in normal years of 7,500 to 15,000 afy. During the currently scheduled time frame for restoration of impacted Saugus capacity (as discussed further in Chapter 5 of the 2005 UWMP), this currently active capacity is more than sufficient to meet water demands, in combination with other sources, if the next two years are dry. At that time, the combination of currently active capacity and restored impacted capacity, through a combination of treatment at two of the impacted wells and replacement well construction, will provide sufficient total Saugus capacity to meet the planned use of

Saugus groundwater during dry-years of between 21,500 af to 35,000 af (see **Tables 4.3-5** and **4.3-6**, above).

Simulated Saugus Formation response to the ranges of pumping under assumed recurrent historical hydrologic conditions is consistent with actual experience under smaller pumping rates. The response consists of: (1) short-term declines in groundwater levels and storage near pumped wells during dry-period pumping; (2) rapid recovery of groundwater levels and storage after cessation of dry-period pumping; and (3) no long-term decreases or depletion of groundwater levels or storage. The combination of actual experience with Saugus pumping and recharge up to about 15,000 afy, now complemented by modeled projections of aquifer response that show long-term utility of the Saugus at 7,500 to 15,000 afy in normal years and rapid recovery from higher pumping rates during intermittent dry periods, shows that the Saugus Formation can be considered a sustainable water supply source to meet the Saugus portion of the operating plan for the Basin." (Draft EIS/EIR, pp. 4.3-53 through 4.3-54.)

The above excerpts, as well as other discussion provided in **Section 4.3**, demonstrate that the Alluvial aquifer and Saugus Formation are not currently over-pumped. Instead, substantial evidence shows that both aquifers are capable of providing a long-term sustainable water supply source.

Please also refer to **Topical Response 8: Groundwater Supplies and Overdraft Claims**, regarding groundwater conditions in the Project area. In addition, please see revised **Section 4.3**, Water Resources, 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 5**

The commentor states that there will be a significant decrease in the quality of riparian habitat, which will affect amphibians and fish such as southern steelhead.

**Section 4.5**, Biological Resources, of the Draft EIS/EIR presented an analysis of the impacts of the proposed Project and alternatives on the biological resources that occur on the Santa Clara River. The Draft EIS/EIR also evaluated potential impacts to riparian vegetation and the special-status species that rely on these habitats, including special-status amphibians and fish. These include short-term construction-related effects (*e.g.*, hydrologic and water quality effects) and long-term secondary effects, including alterations in base flows, timing and duration of flood flows, biochemical changes, condition and composition of the substrate, aquatic and riparian vegetation (including exotic species), water temperatures, increased pollutants from irrigation runoff, and increased runoff from roadways. Secondary impacts associated with increased human presence were also evaluated in the Draft EIS/EIR and included incidental litter and trash from recreation activity; impacts such as fecal material from pet, stray, and feral cats and dogs entering the aquatic system; and increased predation by exotic predators, such as bullfrogs and non-native fish. The Draft EIS/EIR determined that secondary impacts to riparian vegetation and aquatic habitat for all special-status amphibians and fish known to occur, or with potential to occur in the Project area would be significant absent mitigation under Alternatives 2 through 7. However, for southern steelhead, the Draft EIS/EIR determined that potential short-term and long-term secondary impacts would be less than significant because the steelhead is not expected to occur in the Project area. In addition, the Draft EIS/EIR determined that with the implementation of mitigation, the construction of

the proposed Project would not result in significant impacts to water flows, velocities, depth, sedimentation, or floodplain and channel conditions within the Santa Clara River downstream of the Project area (see **Section 4.2**, Geomorphology and Riparian Resources). The analysis in **Section 4.5**, Biological Resources, determined that because the mosaic of vegetation communities in the Santa Clara River would persist, populations of special-status species within and immediately adjacent to the River Corridor would not be significantly affected.

For further responsive information, please refer to revised **Sections 4.2** and **4.5** of the Final EIS/EIR. In addition, please see the Corps' draft 404(b)(1) alternatives analysis found in **Appendix F1.0** of the Final EIS/EIR.

### **Response 6**

The commentor indicates that the buried bank stabilization and drainage channel construction will alter the transition or buffer habitats surrounding the River channel, which will disrupt wildlife movement along the River channel and the food chain of the region and thus impact several Los Angeles County Significant Ecological Areas (SEAs). The commentor suggests that the transition or buffer habitat along the River would be a roadblock to the flow of species from the Santa Susana Mountains and across the Santa Clara River to other uplands.

**Section 4.2**, Geomorphology and Riparian Resources, of the Draft EIS/EIR disclosed that the proposed Project would result in permanent impacts to the Santa Clara River and portions of the floodplain from the construction of project infrastructure including buried bank stabilization and bridges. As described in **Section 4.5**, Biological Resources, of the Draft EIS/EIR, these areas support habitat for a variety of special-status species, including threatened and endangered wildlife such as unarmored threespine stickleback and least Bell's vireo. However, the analysis contained in **Section 4.2**, Geomorphology and Riparian Resources, determined that the River Corridor floodplain would retain sufficient width (700 feet to 2,000 feet) to allow natural fluvial processes to continue in the Project area. Based in part on the Flood Hydraulics Impacts Assessment (PACE 2009) and **Section 4.2**, Geomorphology and Riparian Resources, the Draft EIS/EIR found that the proposed Project or alternatives would not result in significant impacts to the existing water flows, velocities, depth, sedimentation, or floodplain and channel conditions downstream of the Project area because of the proposed Project improvements. These hydrologic effects were also found to be insufficient to alter the amount, location, and nature of aquatic and riparian habitats within the Project area and downstream into Ventura County. As a result, the mosaic of vegetation communities in the River that support wildlife species would be maintained and populations of special-status species within and immediately adjacent to the River Corridor would not be significantly affected.

**Section 4.5**, Biological Resources, of the Draft EIS/EIR presented an analysis of wildlife movement and habitat connectivity in the Project area post-development under Alternatives 2 through 7. This analysis evaluated the potential impacts to wildlife movement and considered how connectivity to the River Corridor and other upland areas would be maintained for wildlife. This would provide species with the range of habitats necessary to meet their life history characteristics and provide for habitat linkages to other natural lands. The Draft EIS/EIR concluded that these impacts would be less than significant with the implementation of mitigation. With the large, unfragmented open space system proposed, wildlife movement through the region will not be dependent on the constrained wildlife corridors within the urban development areas and species will retain access to foraging, watering, and sheltering sites. Furthermore, the dedication of the River Corridor Special Management Area (SMA), High Country SMA, and Salt

Creek area through implementation of Mitigation Measures SP-4.6-23, SP-4.6-37, and BIO-109, respectively, would maintain wildlife access to the existing Santa Clara River SEA. Although wildlife would have access to the Santa Susana Mountains SEA, the existing Highway 118 poses a substantial barrier to wildlife movement in the region. For additional information related to wildlife corridors and wildlife movement, please refer to **Topical Response 12: Wildlife Habitat Connectivity, Corridors, and Crossings**. For further responsive information, please refer to revised **Sections 4.2** and **4.5** of the Final EIS/EIR. In addition, please see the Corps' draft 404(b)(1) alternatives analysis found in **Appendix F1.0** of the Final EIS/EIR.

Please see **Topical Response 11: River Corridor SMA/SEA 23 Consistency** for discussion of the proposed Project's consistency with designated SEAs.

The Corps and CDFG appreciate the comment provided in your letter. Your opinion regarding the proposed Project and its effects on the River Corridor and adjacent habitat linkages will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project.

#### **Response 7**

The comment states, citing **Table 4.12-4**, that disruption of natural habitat will impact buffer area species, reduce water infiltration, increase the velocity of runoff and impair water quality. To clarify, Draft EIS/EIR **Table 4.12-4** does not provide information regarding the disruption of natural habitat and "plumbing systems" (presumed to mean drainage channels located on the project site). Rather, **Table 4.12-4** is entitled "Areas of Important Farmland Affected by the Proposed Project (Alternative 2)," and data provided by the table pertains to the Project's impacts to agricultural soils. Please refer to **Response 2**, above, regarding the Project's effects on groundwater recharge. Extensive information regarding water runoff velocity and water quality is provided in Draft EIS/EIR, **Section 4.1**, Surface Water Hydrology and Flood Control; and **Section 4.4**, Water Quality. Those analyses determined that increased water velocity impacts of the Project would not be significant, either on- or off-site; and that potential water quality impacts would be reduced to a less-than-significant level with the implementation of proposed mitigation measures. Impacts to buffer areas are addressed in Draft EIS/EIR **Section 4.5**, Biological Resources. The comment does not raise any specific issue regarding that analysis and, 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 8**

The commentor recommends that the Final EIS/EIR use the eight primary reasons for decline of southern steelhead to evaluate how each of the alternatives would affect listed and other species in the Santa Clara River Watershed. The commentor lists a number of reasons: alteration of natural stream flow patterns; physical impediments to fish passage; alteration of floodplains and channels; increased sedimentation; discharge of waste; loss of estuarine habitat; and "stocking of hatchery fish interfering with the life cycle of steelhead."

Of the reasons for decline of southern steelhead listed in the comment, the loss of estuarine habitat and stocking of hatchery fish are not relevant to the proposed Project, and, therefore, are not further addressed in this response. Interference with the life cycle of steelhead is a general, overarching concern that includes all of the other threats listed by the commentor, as well as water quality concerns. The other

reasons are also relevant to and were considered in the analysis of impacts to the aquatic and semi-aquatic special-status wildlife species that are analyzed in **Section 4.5**, Biological Resources, of the Draft EIS/EIR.

As described above in **Response 5**, the Draft EIS/EIR concluded that impacts to steelhead would be less than significant. Southern steelhead is not expected to occur in the Project area and the site does not support suitable breeding substrate and cool water temperatures required for breeding. In addition, as described in **Section 4.2**, Geomorphology and Riparian Resources, of the Draft EIS/EIR, the construction of the proposed Project (Alternative 2) or Alternatives would not appreciably alter the existing sediment transport regime (less than a 0.25 percent decrease in average annual sediment supply/delivery to the Santa Clara River). Therefore, channel morphology and substrate composition conditions downstream that support steelhead migration in Ventura County would not be affected. These hydrologic effects were also found to be insufficient to alter the amount, location, and nature of aquatic and riparian habitats within the Project area and downstream into Ventura County. The Newhall Ranch Water Reclamation Plant (WRP) will be a near-zero discharge facility. The analysis in the Draft EIS/EIR determined that the Newhall Ranch WRP discharge would not affect the seasonality (*i.e.*, ephemeral nature) of flows through the Dry Gap and impacts to southern steelhead would be less than significant (see **Subsection 4.5.5.3**, Impacts to Special-Status Species). As described previously, **Section 4.5**, Biological Resources, of the Draft EIS/EIR provided adequate information for the decision makers to assess impacts of the proposed Project and alternatives to southern steelhead.

#### **Response 9**

The comment expresses general concerns regarding stream flow characteristics, runoff water quality, and sedimentation impacts. Extensive information regarding these impacts is provided in the Draft EIS/EIR, **Section 4.1**, Surface Water Hydrology and Flood Control; **Section 4.2**, Geomorphology and Riparian Resources; and **Section 4.4**, Water Quality. Those analyses determined that increased water velocity impacts of the Project would not be significant, either on- or off-site; and that potential water quality impacts would be reduced to a less-than-significant level with the implementation of proposed mitigation measures. For further responsive information, please refer to revised **Sections 4.1**, **4.2**, and **4.4** of the Final EIS/EIR.

The comment does not provide any evidence to suggest that the analysis in the Draft EIS/EIR is inaccurate. The Corps and CDFG appreciate the comment, and it 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 requests information regarding the approximate amount of fill dirt that would be used under each Project alternative for bank stabilization purposes. Methods that would be used to install the proposed bank stabilization are described in Draft EIS/EIR **Subsection 2.6.4.1.1**. As described in that subsection, the proposed bank stabilization would generally not require the importation of fill dirt to the Project site, and most bank stabilization would be installed outside of or adjacent to the existing edge of riparian vegetation. 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 requests information regarding the long-term stability of the bank stabilization, particularly following large storm events. On pages 2.0-81 through 2.0-82, the Draft EIS/EIR, **Subsection 2.6.4.1.1**, provides the following information related to the ability of the proposed bank stabilization proposed for the Santa Clara River to withstand the effects of large storms:

"Pacific Advanced Civil Engineering, Inc. (PACE) prepared a technical memorandum evaluating buried bank stabilization installed in the Valencia area after the 2004/2005 winter storms (see, **Appendix 2.0**, PACE memorandum, dated May 8, 2007). In that memorandum, PACE evaluated buried bank stabilization on the Santa Clara River and main tributaries, which had been installed by the project applicant since 1999. In terms of erosion, PACE concluded that:

[t]he majority of the river bank protection construction . . . includes a horizontal location of the bank protection that is located outside of or adjacent to the existing riparian edge. The placement of the bank protection outside of the existing river corridor substantially decreases the likelihood that the river scour will remove the buried soil [and] vegetation placed over the soil cement bank protection. As noted above, the majority of the bank protection is located outside of the existing riparian corridor where areas will typically experience velocities much less than the main channel creek velocities (typically velocities of 2-8 fps along the banks while velocities >15 fps in the main channel occur adjacent to these locations during the 100-year discharge). Lower, non-erosive, velocities in the areas along the buried bank stabilization indicate that it is unlikely that all or part of the buried bank stabilization will become exposed."

In addition, as stated, PACE evaluated the performance of buried bank stabilization after the 2004/2005 winter storms. The winter season "proved to be one of the wettest years on record and produced an approximate 50-year flood in the Santa Clara River at the [Los Angeles County]/Ventura County line. River flows at this location have been estimated by [Los Angeles] County at 49,800 cfs, the second highest on record." In evaluating the Bridgeport project, PACE noted that the buried bank stabilization was constructed in 1999 and had substantial revegetation growth, which was not damaged during the 2004/2005 winter storms. PACE also evaluated buried bank stabilization areas constructed along San Francisquito Creek for three projects. Although not yet revegetated, aerial photographs provided by PACE show the buried bank stabilization area on San Francisquito Creek and, despite the 2004/2005 winter high flows, none of the buried bank stabilization was exposed. This illustrates the point that placement of buried bank stabilization outside of the existing River corridor substantially decreases the likelihood that the river scour will remove the buried soil and vegetation placed over the bank stabilization."

Based on previous experience with proposed bank stabilization methods, it was concluded that the proposed banks would not be subject to significant scour-related impacts from large storm events.

Please refer to **Responses 5 and 8**, above, regarding project-related impacts to southern steelhead. 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 refers to "Point E" (see Comment 6) and states that there would be severe cumulative impacts resulting from the bank stabilization activities and drainage channel construction within the Santa Clara River floodplain. The comment states that riparian woodlands must be protected because this habitat type is rare.

An analysis of the Project's cumulative impacts was provided in the Draft EIS/EIR, **Section 6.0**, Cumulative Impacts. The analysis concluded that the Project's contribution to potential cumulative riparian habitat impacts in the Santa Clara River watershed would be cumulatively considerable absent mitigation. (See **Subsection 6.5.2**, Geomorphology and Riparian Resources, and **Subsection 6.5.5.3**, Summary of Cumulative Impacts to Biological Resources, of the Draft EIS/EIR for additional information.) The Draft EIS/EIR concluded that post-development hydrologic effects of the proposed Project or Alternatives were insufficient to alter the amount, location, and nature of aquatic and riparian habitats within the Project area and downstream into Ventura County. Large areas of riparian vegetation would be conserved in the Project area. This would include the preservation of the River Corridor SMA and Salt Creek area. 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 13**

The commentor indicates that due to reduced value of the Santa Clara River Corridor from off-road vehicles, bicycles, domestic animals, development, and related runoff, there will be impacts on species in upstream SEAs (Santa Clara River upstream of the Project area and San Francisquito Canyon), species in the Santa Clara River SEA itself, and species in the Santa Susana Mountains SEA.

The comment identifies a variety of potential secondary impacts to the Santa Clara River Corridor, including off highway vehicle use, and suggests that these impacts could carry over to other SEAs. **Section 4.5**, Biological Resources, of the Draft EIS/EIR presented an analysis of Project impacts to the common and special-status plant and wildlife species known or expected to occur in the Santa Clara River corridor. This included a detailed analysis of secondary effects to biological resources, including, but not limited, to human disturbance from off highway vehicle use. The document concludes that there is no indication that off-road activity or urban runoff occurring as a result of the proposed Project would affect the San Francisquito Canyon or Santa Susana Mountains SEAs. These SEAs are located outside the Project area and do not have direct connectivity with the proposed development areas. The analysis determined that these effects would be considered less than significant with the implementation of Project Mitigation Measures BIO-69 and BIO-73. These measures include the management of the River Corridor and High Country SMAs regarding public education, trail signage, fencing, and regular maintenance patrols. Furthermore, as described above in **Response 5**, the Draft EIS/EIR concluded that the River Corridor floodplain would retain sufficient width (approximately 700 feet to 2,000 feet) to allow natural fluvial processes to continue in the Project area and maintain the mosaic of habitats that support wildlife species.

**Section 4.5**, Biological Resources, of the Draft EIS/EIR also evaluated how the area functions as a wildlife movement corridor and analyzed how the proposed Project or alternatives would affect this resource. For further information related to wildlife corridors and wildlife movement, please refer to **Topical Response 12: Wildlife Habitat Connectivity, Corridors, and Crossings**.

Please refer to **Response 14**, below, and **Topical Response 11: River Corridor SMA/SEA 23 Consistency** for discussion of the proposed Project's consistency with designated SEAs.

#### **Response 14**

The comment indicates that no "interior habitat" is included for the Santa Clara River riparian area under any Project alternative. The comment also states that, according to the Los Angeles County General Plan, development proposals near SEAs must be compatible with biotic resources of the area.

**Section 4.5**, Biological Resources, of the Draft EIS/EIR describes the existing biological conditions that occur within the Santa Clara River floodplain. Impacts to the riparian resources that occur in this area from the proposed Project and alternatives were evaluated in **Subsection 4.5.5.2.3.2**, Impacts to Vegetation Communities and Land Covers, of the Draft EIS/EIR. This analysis was based in part on the Flood Hydraulics Impacts Assessment (PACE 2009) and **Section 4.2**, Geomorphology and Riparian Resources, of the Draft EIS/EIR, conclusion that the proposed Project or alternatives would not result in significant impacts to the hydrologic functions of the River. These hydrologic effects were found to be insufficient to alter the amount, location, and nature of aquatic and riparian vegetation communities within the Project area and downstream into Ventura County. The technical analysis further determined that the River floodplain would retain sufficient width (ranging from approximately 700 feet to 2,000 feet wide) to allow natural fluvial processes to continue. As a result, the mosaic of habitats in the River that support wildlife species would be maintained, and populations of special-status species within and immediately adjacent to the River Corridor would not be significantly affected. Furthermore, the Draft EIS/EIR concluded that Project impacts to the remaining riparian resources would be less than significant with mitigation. These include a variety of mitigation measures to restore, enhance, and manage riparian habitat in the River Corridor SMA. For example, Mitigation Measures SP-4.6-1 through SP-4.6-16 and SP-4.6-63 provide requirements for the development of conceptual wetlands mitigation plans (*e.g.*, planting palettes, assessment of functions and values, mitigation ratios, monitoring methods, success criteria, corrective measures) for the revegetation, restoration, and/or enhancement of the riparian areas within the River Corridor SMA. Guidelines are provided for exotics control, temporary irrigation, mitigation banking, annual reporting to the state and/or federal permitting agency, and the replacement of riparian resources. Mitigation Measures BIO-1 through BIO-16 include requirements for the development of conceptual wetlands mitigation plans (*e.g.*, planting palettes, assessment of functions and values, mitigation ratios, monitoring methods, success criteria, corrective measures) for the revegetation, restoration, and/or enhancement of the riparian areas within the Project site.

With respect to Project impacts on nearby SEAs, **Section 4.5**, Biological Resources, of the Draft EIS/EIR provides an extensive environmental analysis of the proposed Project's potential impacts on biological resources in the area, including the Santa Clara River Corridor within and downstream of the Project boundaries and adjacent uplands. With the exception of impacts to three special-status species under Alternative 2 (San Fernando Valley spineflower, southwestern pond turtle, and San Emigdio blue butterfly), the Draft EIS/EIR determined that potential significant impacts to biological resources would be reduced to a less-than-significant level through adoption of the proposed mitigation measures (see

**Subsection 4.5.6**, Mitigation Measures, of the Draft EIS/EIR). **Subsection 4.5.8**, Significant Unavoidable Impacts, of the Draft EIS/EIR summarizes the three significant and unavoidable impacts to special-status species, including San Fernando Valley spineflower, southwestern pond turtle, and San Emigdio blue butterfly, that would result from loss of habitat and impacts to individuals. For further information related to SEAs and SMAs, please refer to **Topical Response 11: River Corridor SMA/SEA 23 Consistency**.

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 requests that the environmental analysis consider the impact of the Newhall Ranch Specific Plan 18-hole golf course on water supply and water quality. Draft EIS/EIR **Section 4.3**, Water Resources, indicates that the proposed Project (Alternative 2) would have a long-term water demand of approximately 16,400 acre-feet per year (afy), consisting of a potable water demand of approximately 8,135 afy and a non-potable demand of 8,265. This long-term water demand quantity accounts for the golf course. The primary supply of non-potable water would be from the approved Newhall Ranch Water Reclamation Plant (WRP). Recycled water used by the Project would be primarily for irrigation purposes, including the irrigation of golf courses.

Draft EIS/EIR **Section 4.4**, Water Quality, evaluated the potential for the proposed Project to result in pesticide-related impacts. That analysis determined that impacts associated with the use of pesticides on the Project site would be reduced to a less-than-significant level because pesticides would be used in accordance with the requirements of the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP), the Newhall Ranch Specific Plan Sub-Regional Stormwater Mitigation Plan, and Project water quality technical reports, which identify appropriate best management practices and project design features to be implemented on the Project site to minimize the potential for pesticides to enter storm water runoff. In addition, for further responsive information, please refer to revised **Section 4.4** of the Final EIS/EIR.

The comment does not raise any specific issue regarding that analysis and, 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.