

To: Newhall Land and Farming,

I would like to address the Newhall Development Project.

With a growing awareness of the effects of mans' decisions on the natural world, the citizens of Santa Clarita realize that it's our responsibility to protect Southern California's last "wild river" the Santa Clara River, from suffering the same fate as the Los Angeles River or Santa Ana River; which are now no more than concrete channels.

1

The Santa Clara River is a crucial part of a wild life corridor that connects two habitat areas in the Angeles National Forest between the San Gabriel Mountains and the Castaic Ranges. The corridor is a unique transition zone between coastal and desert habitats. Due to the rivers critical natural value to the region I suggest that any development that occurs in the Newhall development project occurs outside of the floodplain. This is the only way to adequately protect the wildlife corridor. According to Keith Hay of the Conservation fund; "corridors hold more promise for the conservation of the diversity of life than any other management factor except stabilization of the human population".

2

The Santa Clarita Valley is home to such threatened and endangered species as the Three-Spined Unarmored Stickleback, Arroyo Chub, Least Bells Vireo, and the Arroyo Southwestern Toad. In addition other endangered species such as the California Condor and the Southern California Steelhead, live within the habitats that are connected by the wildlife corridor. These species depend on the river for their survival. In an article title, "Looking to our Future" by John Hopkins and Glenda Edwards, we learn that the spreading of urbanization in Southern California has brought many species and entire communities to the brink of extinction. The article claims that 33% of California's mammals, 40% of California's amphibians and 57% of California's plants are naturally rare or at risk of losing entire ecosystems and masses of species unique to their ecosystem. Developing in the floodplain would only continue this destructive trend. In order to adequately protect these endangered species it is crucial that the development of the area not compromise the integrity of the Santa Clara River as a natural free flowing wild river. John Hopkins explains in an article titled "Protecting Biodiversity" that wild life corridors reduce extinction by allowing animals to move between habitats. This helps to preserve genetic diversities within a species, species diversity within an ecological community and ecological diversity within a region, all three of which are crucial elements of conservation. Thus the corridor must not be disturbed in order to protect the endangered species of the area.

3

In addition the riparian habitats of the Santa Clara River are particularly important in this arid climate because they serve as critical habitat to birds and mammals. The riparian woodlands in particular have been reduced to less than 5 % of their original extent in California. This is a habitat that occurs along the Santa Clara River in the development area. These habitats must not be disturbed by the Newhall development project.

4

Preserving the integrity of the corridor is especially significant due to the imminent affects of global climate change. William E Reisberg and William B Meyers explain in their article; "Modeling Land Use and Land Cover as a Part of Global

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Environmental Change”, that habitats and ecosystems may not be able to migrate as projected by climate models if there are human barriers such as crops or cities or if air, land and water pollution reduces their ability to adapt to climate pressures. In addition genetic variation within a species, which is aided by environmental connectivity, is essential for long-term survival and adaptation to climatic conditions. (Hopkins) The natural habitats of the Southern California Region are made vulnerable to climate change by habitat fragmentation. Maintaining the natural connectivity between them is imperative to facilitate long-term biodiversity of the region. (Hopkins, Edwards). Further, you cannot adequately address the development projects impacts on global environmental change without addressing the development projects impacts on the integrity of the river habitat and as a wildlife corridor.

5

Santa Clarita is the only major urban stretch of the river. (Hopkins, Edwards) Lynn Plambeck educated us in a previous article titled “Is Newhall Ranch Really Moving Forward” about the Failure of the Natural River Management Plan to protect the habitat of endangered species as portions of the floodplain were developed in the Santa Clara River and San Francisquito Creek, environments that were prior to this development designated as significant ecological areas. The Failure of the Natural River Management plan to protect the significant ecological areas and the endangered species as development occurred along the river teaches us that it is unacceptable to develop within the floodplain.

6

The Practice of avoiding development within the floodplain is on the rise throughout the country. (Hopkins, Edwards) Federal Agencies are required to evaluate potential effects of development within the flood plain and consider alternatives. In addition, more than 500 communities through out the country have established “green way” projects that do not develop in the floodplain at all but instead protect the natural river environment and enhance the urban experience (Robert M Searns, “The Evolution of Greenways as an adaptive Urban Landscape Form). I suggest that the Newhall Development use this development approach.

7

The Santa Clara River is indispensable not just to the human species, but, to the rest of the species that also call Santa Clarita their home. This is our opportunity to protect what is rapidly becoming extinct, a natural free flowing wild river and in doing so we can ensure the preservation of the biodiversity in the area.

8

Sincerely,
Alison Maulhardt 6/11/2009



PUBLIC HEARING REQUEST TO SPEAK/WRITTEN COMMENT FORM

NAME (Please print): Alison Maulhardt

DO YOU WISH TO SPEAK AT THIS MEETING? ☐ YES ☐ NO

ADDRESS (Street and Number): 19604 Bruce Place Camarillo County

CITY: Campano County

STATE: CA

ZIP CODE: 0

TELEPHONE NO.: (805) 910 9744

EMAIL ADDRESS: alisonmaulhardt@aol.com

REGARDLESS OF WHETHER YOU PROVIDE VERBAL COMMENTS TODAY, IF YOU WOULD LIKE TO PROVIDE WRITTEN COMMENTS ON THIS PROJECT, YOU MAY RESPOND BELOW AND SUBMIT THIS SHEET TO A CORPS OR CDFG REPRESENTATIVE OR WRITE TO THE CORPS OR CDFG BY JUNE 26, 2009 AT: U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT; REGULATORY BRANCH - VENTURA FIELD OFFICE; ATTN: CESPL-RG-N-2003-01264-AOA; 2151 ALESSANDRO DRIVE, SUITE 110; VENTURA, CA 93001 OR CALIFORNIA DEPARTMENT OF FISH AND GAME - NEWHALL RANCH EIS/EIR PROJECT COMMENTS; 4949 VIEWRIDGE AVENUE; SAN DIEGO, CA 92123
ALTERNATIVELY, YOU MAY EMAIL COMMENTS TO THE FOLLOWING ADDRESSES: Aaron.O.Allen@usace.army.mil or newhallranch@dfg.ca.gov by June 26, 2009.

COMMENTS

I've telephoned a letter with my comments
on the project in question

DATA REQUIRED BY THE PRIVACY ACT

AUTHORITY: 33 CFR 327

PRINCIPAL PURPOSE: Distributed at Public Meetings and Workshops to provide a record of attendees, and to develop a mailing list for future public meetings in keeping with the policy of OCE to conduct Civil Works Program in an atmosphere of public understanding, trust and mutual cooperation. All interested individuals and agencies are to be informed and afforded an opportunity to be heard and their views considered in arriving at conclusions, decisions, and recommendations in the formulation of civil works proposals, plans, projects, and on the proposed uses of navigable waters.

ROUTINE USES: Utilized for determining attendance at Public Meetings; determining who desires to speak at Corps Public Meetings and developing mailing lists for various Corps studies.

DISCLOSURE: Voluntary. Failure to provide information may result in not being contacted for future public meetings, etc.

132. Letter from Alison Maulhardt, dated June 11, 2009

Response 1

The comment states that the citizens of the City of Santa Clarita realize it is their responsibility to protect the Santa Clara River, the "last wild river" in southern California. The U.S. Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG) appreciate the comment 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; however, 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 suggests that any development within the Project site occur outside of the floodplain in order to protect the existing wildlife corridor. The proposed Project (Alternative 2) would minimize development located in the 100-year floodplain, and each Project alternative evaluated various development scenarios that further reduced development in floodplain areas. For example, "Alternative 7" is also referred to as the "Avoidance of the 100-Year Floodplain" alternative. Implementation of this alternative would result in the avoidance of the 100-year floodplain to the extent practicable, as bank stabilization along the Santa Clara River would be constructed outside of the 100-year floodplain and only one bridge would be provided across the River. This alternative was identified by the Draft EIS/EIR as the environmentally superior project alternative and will be considered by decision-makers before taking action on the proposed Project. In addition, please refer to **Response 5**, below, which provides additional information related to the wildlife corridor impacts of the proposed Project. 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

This comment provides general comments related to species of concern found on the Project site and asserts that the existing wildlife corridor must not be disturbed in order to preserve biodiversity. Please also see **Response 2**, above.

Section 4.5, Biological Resources, of the Draft EIS/EIR provided extensive information regarding the potential impacts to biological resources from the proposed Project and alternatives, including those identified by the commentor. **Section 4.5** of the Draft EIS/EIR evaluated impacts to these and other special-status species and identified mitigation that would reduce impacts of the Project to biological resources to less-than-significant levels. However, impacts to San Fernando Valley spineflower, southwestern pond turtle, and San Emigdio blue butterfly would be significant and unavoidable under Alternative 2. For Alternatives 3 through 7, impacts to these species would be mitigated to less-than-significant levels.

Thank you for providing comments regarding wildlife movement and corridors. **Subsection 4.5.5.2.4**, Impacts to Wildlife Movement and Habitat Connectivity, of the Draft EIS/EIR addressed wildlife habitat connectivity and wildlife corridors at three spatial scales, including landscape linkages, local wildlife corridors, and wildlife crossings. This analysis concluded that while the proposed Project would result in

the functional loss of some wildlife movement within potential wildlife corridors surrounded by development, overall the impacts from the proposed Project would be less than significant with the implementation of Project mitigation measures. These mitigation measures include SP 4.2-23, SP 4.2-37, and BIO-19, which require the dedication of the River Corridor Special Management Area (SMA), High Country SMA, and Salt Creek area, respectively. Further, the analysis in the Draft EIS/EIR in **Subsection 4.5.5.2.4.2** supports the conclusion that impacts to wildlife landscape habitat linkages would be adverse but not significant for Alternatives 2 through 7. The Draft EIS/EIR also determined that the post-development widths of the River Corridor SMA floodplain would be approximately 700 feet at its minimum point, to 2,000 feet wide, with most areas ranging from 1,000 to 2,000 feet wide. Approximately 300 feet of adjacent upland open space, including some natural open space, particularly at the mouth of tributaries, would provide lateral buffer for the east-west habitat linkage and wildlife access to areas outside the River floodplain. While development would occur in some areas adjacent to the Santa Clara River, the Draft EIS/EIR concluded the River Corridor SMA would retain habitat to support movement and connectivity to the adjacent uplands. For additional information regarding the movement of wildlife, please refer to **Topical Response 12: Wildlife Habitat Connectivity, Corridors, and Crossing**, and revised **Section 4.5** of the Final EIS/EIR.

Response 4

The comment addresses general concerns regarding the habitat value of riparian areas located along the Santa Clara River. As described in **Subsection 4.5.3.3**, Existing Conditions by Planning Area, of the Draft EIS/EIR, riparian communities in the proposed Project area are of high sensitivity and biological value. The Draft EIS/EIR describes the importance of riparian plant communities and their role in supporting wildlife. 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, the Draft EIS/EIR, which found that the proposed Project and 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 to 2,000 feet) to allow natural fluvial processes to continue. As a result, the mosaic of vegetation communities in the River floodplain that support special-status wildlife species would be maintained. Impacts to riparian resources from the proposed Project and each alternative were evaluated in **Subsection 4.5.5.2.3.2** of the Draft EIS/EIR. The Draft EIS/EIR concluded that these impacts would be significant absent mitigation. In addition, for further responsive information, please see revised **Sections 4.2** and **4.5** of the Final EIS/EIR.

Response 5

The comment states that preserving the Santa Clara River Corridor is important due to the imminent effects of global climate change, citing an article by Reisberg and Meyers entitled "Modeling Land Use and Land Cover as a Part of Global Environmental Change." The comment suggests that maintaining natural connectivity is important for long-term biodiversity and that the effects of global climate change cannot be adequately addressed without addressing the effect of the proposed Project on the integrity of the River as a wildlife corridor.

Section 8.0 of the Draft EIS/EIR, Global Climate Change, includes an appendix document providing a detailed survey of existing literature on the relationship between global climate change and special-status biological resources. That survey concludes that at this time, in light of the current state of the science and in accordance with State CEQA Guidelines section 15145, it is not possible to reasonably forecast potential impacts to such species. This conclusion is consistent with the general scientific consensus. For example, while there is a link between global climate change and special-status biological resources, the U.S. Fish and Wildlife Service's (USFWS) "Rising to the Challenge: Strategic Plan for Responding to Accelerating Climate Change (Draft)" (September 21, 2009), states that, "[o]ne of the major challenges of addressing climate change effects on fish and wildlife will be identifying and accounting for the uncertainty that remains in our understanding of future climate change and how that change will affect ecological systems" (USFWS 2009, p. 8). Currently, potential future impacts are assessed from global climate change models. However, the USFWS notes the importance of "downscaling" such models to better account for regional and local impacts. The importance of this finding also was noted in the "5-Year Review: Summary and Evaluation for the Unarmored Threespine Stickleback," issued by the Ventura Fish and Wildlife Office on May 29, 2009. On page 25 of the 5-Year Review, the USFWS noted that "predictions of climatic conditions for smaller sub-regions, such as California, remain uncertain." Therefore, USFWS concluded that it lacked "adequate information to make accurate predictions" regarding the effects of climate change on this particular species. In addition, for further responsive information, please see revised **Section 8.0** of the Final EIS/EIR, including the revised appendices found in the Final EIS/EIR **Appendix F8.0**.

The proposed Project will not substantially affect the existing conditions in the Santa Clara River Corridor. Please see **Response 3**, above, for a discussion of wildlife corridors in the Project area. For additional information regarding the movement of wildlife, please refer to **Topical Response 12: Wildlife Habitat Connectivity, Corridors, and Crossings**.

Response 6

Please refer to **Topical Response 3: Natural River Management Plan Projects and Mitigation**, which provides information regarding the Natural River Management Plan (NRMP). Please also refer to **Topical Response 11: River Corridor SMA/SEA 23 Consistency** for additional information about the Project's consistency with this ecological area and its relationship to the County-designated on-site Significant Ecological Areas (SEA). The comment also expresses the opinion that it would be unacceptable to develop within the floodplain. This topic received extensive analysis in **Section 4.2**, Geomorphology and Riparian Resources, **Section 4.5**, Biological Resources, and **Section 4.6**, Jurisdictional Waters and Streams, of the Draft EIS/EIR. In addition, the alternatives to the proposed Project evaluated various development scenarios, which provided less development in the 100-year floodplain when compared to the proposed Project (Alternative 2). In addition, for further responsive information, please see revised **Sections 4.2, 4.5, and 4.6** of the Final EIS/EIR, and the Corps' draft 404(b)(1) alternatives analysis, found in **Appendix F1.0** of the Final EIS/EIR. All of this information will be made available to the decision makers prior to a final decision on the proposed Project.

Response 7

Please refer to **Response 2**, above, which provides information regarding the development and analysis of Project alternatives in the Draft EIS/EIR that minimize development in the designated 100-year floodplain to the extent practicable.

Response 8

The Corps and CDFG appreciate the opinion provided regarding the importance of the Santa Clara River. Both the Corps and CDFG take their responsibilities to protect resources under their jurisdictions extremely seriously. 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 address the content or adequacy of the Draft EIS/EIR, no additional response is provided.