

SANTA MONICA MOUNTAINS CONSERVANCY

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Mr. Kim Szalay
Special Projects Section
Department of Regional Planning
County of Los Angeles
320 W. Temple Street, 1362
Los Angeles, California 90012

**Pre-Draft Environmental Impact Report Comments
Homestead South - Newhall Ranch
Project No. TR060678-(5)**

Dear Mr. Szalay:

The Homestead South boundary encompasses more of the Santa Clara River than any other Tract in the Newhall Ranch Specific Plan area. The Santa Clara River is perhaps the most regionally significant habitat linkage element in Los Angeles and Ventura counties. The Santa Clara River is also one of the most significant aquatic resources in Southern California. The Conservancy seeks to assure that these regionally significant ecological functions are maximized by any project approved for the 2,535-acre Tract and External Map Improvements area addressed in the subject Draft Environmental Impact Report (DEIR).

The Homestead South DEIR area boundary also includes the habitat linkage transition areas on the south side of Highway 126 for Chiquito Canyon and San Martinez Grande creeks. The ultimate build out of this 2,535-acre area will directly determine how effective these two creeks remain for conveying wildlife from the Los Padres National Forest core habitat on the north of Highway 126 into the Santa Clara River habitat linkage system. These two drainage bottoms provide the only substantive north-south connectivity across Highway 126 within the Specific Plan boundary. To adequately analyze the effectiveness of future habitat connectivity conditions on the south side of the highway, the DEIR analysis must consider existing conditions and future project conditions and impacts north of the highway.

Every DEIR development alternative must be analyzed for how effectively animals can travel from the San Martinez Grande and Chiquito Creek culverts into the Santa Clara River. If adequate connectivity for wildlife ranging from large mammals to reptiles is not provided, that would represent an unavoidable significant adverse biological impact. We encourage designs that maximize the quality and dimensions of these two habitat linkage junctions.

Even before the existing drought, surface water levels in the Santa Clara River have steadily declined over the past 20 years. The portion of the river within the subject DEIR area supports populations of three native fish (unarmored three spine stickleback, arroyo chub, Santa Ana sucker) and western pond turtles. It is imperative that any approved Homestead South project not contribute to the decline of surface water available to these aquatic species. Any further decline in surface water levels will exacerbate any existing (nitrate) and future water quality issues. Ideally the design and mitigation measures for any approved Homestead South project can demonstrate a probable increase in surface water levels via broad recharge of shallow groundwater basins.

The Specific Plan and the Homestead South Initial Study base their analyses on the use of local groundwater to supply water for the DEIR area. However, news reports indicate that the groundwater available beneath most of Newhall Ranch including Homestead South is significantly impaired for nitrates. The DEIR must precisely address how that high nitrate concentration in the project's proposed water supply will not end up in the Santa Clara River and adversely affect aquatic organisms. The DEIR must also demonstrate how the proposed groundwater pumping will not contribute to decreased surface water levels that could adversely impact aquatic organisms in persistent drought conditions or otherwise.

The DEIR must address the potential adverse effects of the proposed project and each development alternative on potential groundwater basin subsidence. The escalating increase in groundwater pumping from the Santa Clara River proper upstream of Newhall Ranch over the past 20 years combined with the current historic drought, quite probably has increased the susceptibility of numerous area groundwater basins to irreparable subsidence. Another year of drought or a local earthquake could trigger substantial subsidence. The DEIR must analyze how the proposed project could adversely effect the susceptibility both underlying and nearby groundwater basins to subsidence. The DEIR must further analyze how such potential subsidence could adversely affect surface water conditions for aquatic species within the DEIR addressed portion of the Santa Clara River. To provide an adequate baseline for such impact studies on aquatic species, the DEIR analyses must be based on a thorough biological assessment.

To adequately address how the proposed project and its DEIR alternatives could adversely impact the quality and availability of surface water in the Santa Clara River for aquatic species, the DEIR must assess what factors contribute to the maintenance of sufficient surface water to allow three native fish species to persist within the DEIR project boundary. If the factors that allow such year-round surface water to persist for the fish species are not identified or greatly

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understood, then it is difficult to assure that any proposed development and/or nearby groundwater pumping will not adversely or terminally affect those organisms.

The combination of drought, charted escalating water demand for the next 30 years, and unregulated upstream groundwater pumping has collectively created a new baseline condition for the assessment of potential aquatic organism impacts in the Santa Clara River. The reliance on groundwater basin data obtained just several years back may not be applicable now. The resiliency of the Santa Clara River's hydrological systems to maintain adequate surface water for native fish most likely has been substantially diminished. We urge the County to assure that all of the above concerns are adequately addressed in the subject DEIR.

Please address all future correspondence and documentation to Paul Edelman, Deputy Director for Natural Resources and Planning, by phone at (310) 589-3200 extension 128 and by email at edelman@smmc.ca.gov).

Sincerely,

LINDA PARKS
Chairperson