

SANTA MONICA MOUNTAINS CONSERVANCY

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Agenda Item 13
SMMC
12/12/16



October 24, 2011

Los Angeles County Board of Supervisors
Executive Office
500 West Temple Street
Los Angeles, California 90012

Mission Village Project, County Project No. 04-181-(5)
Landmark Village Project, County Project No. 00-196-(5)
Newhall Ranch Specific Plan Area

Honorable Board Members:

The Santa Monica Mountains Conservancy (Conservancy) remains concerned about the impact the proposed projects would have on the Santa Clara River watershed. Our attached Mission Village Project DEIR comment letter outlines many of those concerns, the foremost of which is the lack of sufficient buffer along the Santa Clara River corridor and the extensive hydrological engineering of the watershed. A review of the hydrology studies upon which both the Mission Village and Newhall Ranch Resource Management and Development Plan environmental impact reports are based found substantial deficiencies and discrepancies that challenge their use as substantial evidence under CEQA. This Environmental Protection Agency (EPA)-commissioned review, also attached, found that the environmental studies vastly underestimated the extent of the active channel, utilized inappropriate or incomplete data sets, and made incorrect assumptions about sediment flows and river geomorphology.

At the core of these findings is that the project proposes to freeze the site's active channels without exploring the effect of doing so on Santa Clara River hydrology, geomorphology, or ecology. This feat requires a complex system of bank armoring, channel grade stabilization, and other engineering techniques. The EPA review found that basic assumptions about erosiveness and sedimentation rates in the project area were erroneous. All proposed engineering treatments were designed based on these flawed assumptions.

The net result is that the unpredictable effects of the project's alteration of sediment flows will likely lead to erosion of the remaining unarmored river banks, loss of property, and ultimately ecological degradation as the last free-flowing reaches are stabilized in response to the changing forces.

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The Conservancy hopes that these issues can be clarified before final approval of the project. To provide the best available information to decision makers, environmental impact reports should only be based on accurate data and valid assumptions. Recent advancement in Santa Clara River watershed geomorphology modeling calls into question the adequacy of the current environmental studies.

Thank you for your consideration of these comments. If you have any questions, I can be reached at (310) 589-3200, ext. 128.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Edelman", written in a cursive style.

PAUL EDELMAN

Deputy Director
Natural Resources and Planning

Attachments:

Santa Monica Mountains Conservancy letter on Mission Village Draft Environmental Impact Report dated November 8, 2010

Stillwater Sciences technical memorandum on Newhall Ranch RMDP-SCP Final EIS/EIR dated August 16, 2011