

**SANTA MONICA MOUNTAINS CONSERVANCY**

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265  
PHONE (310) 589-3200  
FAX (310) 589-3207  
WWW.SMMC.CA.GOV



December 12, 2016

Samuel Dea  
County of Los Angeles  
Department of Regional Planning  
Special Projects Section, 13<sup>th</sup> floor, Room 1362  
320 West Temple Street  
100 Civic Center Way  
Los Angeles, California 90012

**Mission Village Project - Vesting Tentative Tract Map No. 61105**  
**Draft Recirculated Environmental Impact Report Comments**  
**Project No. 04-181 - SCH No. 2005051143**

Dear Mr. Dea:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Draft Re-circulated Environmental Impact Report (DRP-EIR) for the Mission Village project within the Newhall Ranch Specific Plan. The Conservancy as the principal State planning agency for the subject area finds that the DRP-EIR remains deficient for multiple reasons. Because of the statewide importance of the subject Santa Clara River property and the interrelated tract maps and separate EIRs comprising the five villages of the Newhall Ranch Specific Plan, and because of the complexity and magnitude of new environmental analysis, the Conservancy requests a 45 day extension of the comment period for additional review and potential comments.

**Greenhouse Gas Emission from 28.9 Million Cubic Yards of Grading**

At a minimum the project would require 28.9 million cubic yards of grading (not factoring in any allowance for remedial grading) to provide 4055 residences, a school, library, bus transfer station, one million square feet of commercial space, multiple roads, a bridge through the Santa Clara River, water systems, and sewer systems. The greenhouse gas emissions from moving 28.9 million cubic yards of earth and constructing all of the above listed facilities are an unavoidable significant adverse impact. Those proposed emissions cannot come close to being adequately offset (no net increase) by the 13 GHG emissions mitigation measures contained in the DRP-EIR. Of those 13 mitigation measures installing electric car charging stations and purchasing unspecified carbon credits will not offset the

diesel emissions from cutting, moving, shaping, and compacting 28.9 million cubic yards of earth. A statement of overriding considerations must be adopted unless there is a significant reduction in GHG emissions from project construction alone. The DRP-EIR is deficient for not addressing why the GHG construction emissions from the four other Newhall Ranch Specific Plan villages and their connecting infrastructure is not addressed as a cumulative GHG emission impact. Did the baseline level of GHG emissions reflect the exact agricultural conditions that currently exist on the site at the end of 2016?

### **Santa Clara River Impacts and Unarmored Threespine Stickleback Endangered Fish**

The DRP-EIR further remains deficient because its analysis of potential impacts both to Santa Clara River riparian habitat and potential adverse impacts to the unarmored threespine stickleback assume a static river flood plain over multiple years if not decades. The analysis is based on the proposed project river bank stabilization freezing the site's active channels without exploring the effect of doing so on the river's hydrology, geomorphology, and ecology. The flooding potential of the river is too great to make tidy assumptions—such as that the proposed Commerce Center Bridge location will not go through or adjacent to future areas that contain unarmored threespine stickleback fish. What happens in that case—would the bridge not be built? The DRP-EIR does not address that potential condition. The only solution is to build 300 feet of flexibility into the potential Commerce Center Drive bridge location to create adequate odds that bridge construction will not have either significant direct or indirect adverse impacts to occupied unarmored threespine stickleback habitat if they exist in the proposed alignment during any part of the construction period.

The EPA review of the documentation to date found that basic assumptions about erosiveness and sedimentation rates in the project area were erroneous. Flawed assumptions are not a good foundation on which to base a complex analysis and impact assessment. Such potential flaws may not have direct bearing on the potential take of unarmored threespine stickleback from bridge construction, however they would on the function of a river that has been substantially narrowed and boxed in by the proposed bank stabilization. In a high water condition, the artificially narrowed river may reset the hydrology such that prime habitat for endangered fish is created directly in the pathway of one of the proposed Specific Plan bridges over the Santa Clara River.

Mission Village Project DRP-EIR Comments

December 12, 2016

Page 3

The DRP-EIR is not clear if every bridge span needs to be a minimum of 165 feet over the river or just those span wetted surface areas. All spans should be a minimum of 165 feet to maximize natural hydrological and ecological conditions in the river. It is important for the DRP-EIR to address the level of street lighting spillage into the riparian ecosystem.

The DRP-EIR makes numerous references to the San Jose Flats area bank stabilization construction but is deficient for not including any figures that show and label the area.

The project involves the construction of temporary haul route bridge across the river that can remain in place for three years. The DRP-EIR and its appendices conclude that the temporary bridges would not result in the take of unarmored threespine stickleback fish. However, the DRP-EIR is deficient if the unrecirculated portion of the DEIR does not address how such temporary bridges could affect wildlife movement, nesting birds, reptiles, and amphibians over the course of three years.

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and mail all future project correspondence to his attention at the above letterhead address.

Sincerely,

IRMA MUÑOZ  
Chairperson