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April 20, 2012

Mr. Samuel Unger
Executive Officer
Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013
VIA ELECTRONIC MAIL: losangeles@waterboards.ca.gov

RE: VCK Comment Letter #2: Tentative Waste Discharge Requirements including Clean Water Act Section 401 Water Quality Certification for: Newhall Land & Farming Company, Proposed Management and Development Plan and Spineflower Conservation Plan, Santa Clarita, Los Angeles County (File No. 11-168)

Dear Mr. Unger:

On behalf of the Wishtoyo Foundation and its Ventura Coastkeeper program (“VCK”) and over 700 of our members who desire an ecologically healthy Santa Clara River with unpolluted water that supports a variety of recreational, spiritual, and aesthetic uses, thank you for the opportunity to comment on the Tentative Waste Discharge Requirements including Clean Water Act Section 401 Water Quality Certification for: Newhall Land & Farming Company, Proposed Management and Development Plan and Spineflower Conservation Plan, Santa Clarita, Los Angeles County (File No. 11-168) (“Newhall WDR”).

As stated in VCK’s first letter, we feel it is imperative that Santa Clara River’s water quality, cultural uses, aesthetics, and aquatic ecosystem functions are adequately protected through the conditions in the Newhall WDR and Clean Water Act §401 Water Quality Certification. VCK opposes the tentative Newhall WDR and Clean Water Act §401 certification as written, and requests that the Regional Board deny the issuance of the Clean Water Act §401 Certification and Newhall WDR unless stronger requirements are placed on the Project to adequately protect the ecological integrity and water quality of the Santa Clara River and its tributaries as outlined in VCK’s WDR/§401 Water Quality Certification letter dated April 10, 2012.

VCK would like to clarify, that in regards to the LID requirements, it is VCK’s position and request that the Newhall WDR and CWA §401 Water Quality Certification contains LID requirements that mandate the Newhall Project, in post development conditions, retains for

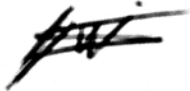


evaporation, reuse, or infiltration, 100% of the precipitation up to and from an 85th percentile storm.

Thank you for considering our clarifying comments. These LID requirements are necessary to protect the Santa Clara River ecosystem from the post development pollution and hydromodification impacts that would be caused by the Newhall Project without this LID requirement.

Please feel free to contact us with any questions.

Sincerely,



Jason Weiner, M.E.M.
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