

Sent: Friday, January 29, 2016 12:17 PM
To: Santulli, Shanti A. SPL <Shanti.A.Santulli@usace.army.mil>
Cc: Michael.harrison@mail.house.gov
Subject: [EXTERNAL] public affairs officer for Saturday's meeting?

Shanti:

We have no speaker from ACE for Saturday's meeting at the Fallbrook Library, Saturday, January 30th, 3 PM.

Any progress on that?

Thanks so much for your help.

Best,

Teresa Platt
Blockedwww.TeresaPlatt.com
760-468-2025
Skype: teresaplatt
teresaplatt.com@gmail.com

From: [Santulli, Shanti A. SPL](#)
To: [Van Sant, Richard SPL](#)
Subject: FW: Fallbrook Golf Course Proposal (UNCLASSIFIED)
Date: Friday, January 29, 2016 2:44:51 PM

FYI - Michael Harrison works in Duncan Hunter's office.

-----Original Message-----

From: Castanon, David J SPL
Sent: Friday, January 29, 2016 12:54 PM
To: michael.Harrison@mail.house.gov
Subject: Fallbrook Golf Course Proposal (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Michael,

Thanks for returning my call on Wednesday. Sorry I missed you.

The paragraph below explains the status of my regulatory program's involvement in the proposal to convert this golf course into a compensatory mitigation bank.

The Corps and Calif. Dept. of Fish and Wildlife met with representatives from Earth Balance (potential bank sponsor) and REC Consulting Inc. (consultant working on behalf of the potential bank sponsor) and conducted a site visit in December 2015 at the potential mitigation bank site. The consultant provided a tour of the site and requested agency representatives feedback on the site's potential for habitat restoration. The Corps has not yet received a "prospectus" (an official proposal to create a mitigation bank at the current location of the Fallbrook Golf Club) and therefore we have no federal action at this time. If the sponsor chooses to submit a prospectus for a mitigation bank, the Corps would evaluate it at that time then initiate a public review process that would include adjacent landowners, federal and state resource agencies, and other known interested parties. There would be a specified comment period during which the public may provide information, opinions, or concerns on the proposed project. The Corps, in coordination with other regulatory agencies, then evaluates whether the mitigation bank would provide valuable ecological resources to that could be used as compensatory mitigation to offset impacts of other future permits issued elsewhere. The Corps will not initiate that public review process unless and until we receive a complete prospectus from the proposed sponsor. In any case, and for any mitigation bank, the Corps is not a party to any land purchase or transfer of property.

We won't be able to participate in a meeting on Saturday, but feel free to share the information in the paragraph above. If you have any questions, I can be reached at (805) 585-2141, or my cell # (805) 358-9850.

V/R,

David J Castanon

Chief, Regulatory Division
U.S. Army Corps of Engineers, Los Angeles District
915 Wilshire Blvd
Los Angeles, CA 90017

Assist us in better serving you! Please complete our brief customer survey, located at the following link:
http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

CLASSIFICATION: UNCLASSIFIED

From: [Santulli, Shanti A. SPL](#)
To: [Cohen, Mark D SPL](#)
Cc: [Farrar, Corice J SPL](#); [Fuderer, Gregory A SPL](#); [Van Sant, Richard SPL](#)
Subject: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016
Date: Tuesday, January 26, 2016 12:17:52 PM
Attachments: [EXTERNAL Re questions for you regarding mitigation banking.msg](#)
Importance: High

Hi all,

See below and attached.

In sum, I spoke to Teresa Platt this morning (sender of the email below and attached; Fallbrook resident) regarding the closure of the Fallbrook Golf Course and supposed plans to convert the golf course into a mitigation bank. Ms. Platt stated that Duncan Hunter (CA congressman, 50th district) or his office has been in touch with us on this already and requested a speaker from the Corps be present at a planned community meeting this Saturday in Fallbrook and present on what is happening at the San Luis Rey Downs Golf Course (i.e., Moosa Creek Mitigation Bank, which I am currently processing) as an example of what is going to happen to them. She was very upset and stated we had a lot of explaining to do to the people of Fallbrook. I told Teresa a bit about our mitigation banking process and that if the Corps were to receive an application or proposal for a mitigation bank, we would reach out to the public at that time via our public comment process and could provide information on the mitigation banking process as well. I let her know, because of her insistence, that I would forward our request to our PA folks, but that I was not able to attend the meeting this Saturday. RJ informed me that he has conducted a pre-prospectus site visit with the consultant (REC) and CDFW. He will likely be the assigned PM to the mitigation bank should a prospectus come in to our office, but is also unavailable this weekend. We have no anticipated timing for when we may receive or if we will receive a prospectus for this.

Have you received anything on this from Duncan Hunter's office?

[REDACTED]

[REDACTED]

Shanti

-----Original Message-----

From: Save Fallbrook Golf Course [<mailto:savefallbrookgolfcourse@gmail.com>]
Sent: Tuesday, January 26, 2016 8:46 AM
To: Santulli, Shanti A. SPL <Shanti.A.Santulli@usace.army.mil>
Cc: Michael harrison@mail.house.gov
Subject: [EXTERNAL] Speaker Request for January 30, 2016

Ms. Santulli:

Good talking to you this AM.

We would like a speaker from the Corps at the Library meeting, see details below.

Thank you!

Teresa Platt

Steering Committee Meeting
760-468-2025

=====

Join us for a meeting at the Fallbrook Library, Saturday, January 30th, 3 PM where you can learn all about this issue.

And mark your calendars: Fallbrook Community Planning Group Meeting, February 15th, 7 PM, Live Oak School, 1978 Reche Road.

Thank you for your support and spread the word!

Save Fallbrook Golf Course
Blockedwww.SaveFallbrookGolfCourse.com <Blockedhttp://www.savefallbrookgolfcourse.com>
2903 Lakemont Drive
Fallbrook, CA 92028
savefallbrookgolfcourse@gmail.com <<mailto:savefallbrookgolfcourse@gmail.com>>

From: [TeresaPlatt.com](http://www.teresaplatt.com)
To: [Amanda McCarthy](mailto:Amanda.McCarthy@wra-ca.com)
Cc: [Santulli, Shanti A. SPL](mailto:Shanti.A.SPL@wra-ca.com)
Subject: [EXTERNAL] Re: questions for you regarding mitigation banking
Date: Monday, January 25, 2016 8:09:15 PM

Amanda:

Thanks for the info. Haven't heard any comments from Shanti.

There is a meeting at the Fallbrook Library on Saturday January 30th at 3 PM and we are seeking speakers from the ACE and WRA on this subject, focusing on the fact that part of Fallbrook Golf Course is being sold to a mitigation bank. Everyone wants to know what this will mean.

Can you please send over a representative and we'll arrange time on the agenda. Shanti: I believe Duncan Hunter's office is also reaching out to you on this, looking for the person in charge of community relations and communications, needing a commitment!

Thank you!

Teresa Platt
www.TeresaPlatt.com <<http://www.teresaplatt.com>>
760-468-2025
Skype: teresahplatt
teresaplatt.com@gmail.com

On Jan 20, 2016, at 7:55 PM, Amanda McCarthy <mccarthy@wra-ca.com <<mailto:mccarthy@wra-ca.com>> > wrote:

Hi Teresa,

That is a good question. If you review the 2008 mitigation rule, http://www.usace.army.mil/Missions/CivilWorks/RegulatoryProgramandPermits/mitig_info.aspx,

You will find that mitigation banks (and in-lieu-fee program projects) are intended to create mitigation in large, contiguous areas—there is ample research supporting this approach, vs. having very small mitigation projects completed in separate areas with varying success. The rule specifically states that preference is given to mitigation banks and ILF programs because they “involve larger, more ecologically valuable compensatory mitigation projects as compared to permittee-responsible mitigation.” Permittee-responsible mitigation as historically done wherever space was available within property boundaries and not necessarily tied to ecological function or uplift.

We have several projects that have created mitigation for impacts through creek restoration in the middle of development projects (with buffers) and within existing, operating golf courses. However, these projects would not be suitable for use as a mitigation bank because 1) there is not enough contiguous acreage for buffers nor for the market to support entitlement; 2) an operational golf course, with irrigation, pesticides, and on-going disturbance is not conducive to restoring all of the function and value for the habitat or for the plant and wildlife species that require the habitat; and 3), the approval timeline for investors is too long and would be appropriate only for permittee-responsible mitigation.

Please let me know if you have additional questions—Shanti, please add as appropriate!

Kindest regards,
Amanda

AMANDA MCCARTHY | Principal, Chief Operating Officer | d: 415.524.7456 | o: 415.454.8868 x 1170 | c:
[REDACTED] | mccarthy@wra-ca.com <<mailto:mccarthy@wra-ca.com>>
WRA, Inc. | www.wra-ca.com <<http://www.wra-ca.com/>> | 2169-G East Francisco Blvd., San Rafael, CA 94901 |
San Diego | Fort Bragg | Denver

From: TeresaPlatt.com <<http://teresaplatt.com>> [<mailto:teresaplatt.com@gmail.com>
<<mailto:teresaplatt.com@gmail.com>>]
Sent: Wednesday, January 20, 2016 2:03 PM
To: mccarthy@wra-ca.com <<mailto:mccarthy@wra-ca.com>> ; shanti.A.Santulli@usace.army.mil
<<mailto:shanti.A.Santulli@usace.army.mil>>
Subject: Re: questions for you regarding mitigation banking

Additional question after reading https://www.fws.gov/endangered/esa-library/pdf/Conservation_Banking_Guidance.pdf

Can the owner of a golf course establish a mitigation bank, creating environmental benefits on and around his golf course, while keeping the golf course intact?

Thank you.

Teresa Platt

On Jan 20, 2016, at 11:27 AM, TeresaPlatt.com <<http://teresaplatt.com/>> <teresaplatt.com@gmail.com
<<mailto:teresaplatt.com@gmail.com>> > wrote:

Ladies:

Can you help me with some concerns about the loss of San Luis Rey Golf Course to mitigation banking?

As I understand it, mitigation banking is supposed to secure UNDEVELOPED LAND for use as mitigation credits. But this was a developed golf course.

With the downturn in the golfing business, are all our golf courses at risk of being converted into fallow areas?

Please direct me to the F&WS and Army Corp guidelines on property suitable for mitigation banking or anything else I need to understand this.

Thank you very much for your help with this.

Teresa Platt

www.TeresaPlatt.com <<http://www.teresaplatt.com/>>

760-468-2025

Skype: teresahplatt

teresaplatt.com@gmail.com <<mailto:teresaplatt.com@gmail.com>>

From: [Fuderer, Gregory A SPL](#)
To: [Santulli, Shanti A. SPL](#); [Castanon, David J SPL](#); [Cohen, Mark D SPL](#)
Cc: [Farrar, Corice J SPL](#); [Van Sant, Richard SPL](#); [Field, Thomas J \(Jay\) SPL](#); [Jozens, George F SPL](#)
Subject: RE: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016 (UNCLASSIFIED)
Date: Wednesday, January 27, 2016 10:51:24 AM

[REDACTED]

Greg Fuderer
Senior Public Affairs Specialist
213-479-8698

-----Original Message-----

From: Santulli, Shanti A. SPL
Sent: Wednesday, January 27, 2016 7:17 AM
To: Castanon, David J SPL <David.J.Castanon@usace.army.mil>; Cohen, Mark D SPL <Mark.D.Cohen@usace.army.mil>
Cc: Farrar, Corice J SPL <Corice.J.Farrar@usace.army.mil>; Fuderer, Gregory A SPL <Gregory.A.Fuderer@usace.army.mil>; Van Sant, Richard SPL <Richard.J.Vansant@usace.army.mil>
Subject: RE: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016 (UNCLASSIFIED)

Here is a list of Duncan Hunter's staff I found on his webpage (click on the name for contact info):
<http://staffers.sunlightfoundation.com/member/H001048>. Michael Harrison's information is on there, but I think he was a more staff-level position when Therese had previously reached out to him (based on memory of it all). Anyway, thought this list may help you decide who would be best to call for this.

I'm in the office today (760-602-4834), and RJ is teleworking (213-359-0421) if you need to reach out to either or us. We can also do a quick conference call if it's easier. Just let us know.

Shanti

-----Original Message-----

From: Castanon, David J SPL
Sent: Tuesday, January 26, 2016 5:12 PM
To: Santulli, Shanti A. SPL <Shanti.A.Santulli@usace.army.mil>; Cohen, Mark D SPL <Mark.D.Cohen@usace.army.mil>
Cc: Farrar, Corice J SPL <Corice.J.Farrar@usace.army.mil>; Fuderer, Gregory A SPL <Gregory.A.Fuderer@usace.army.mil>; Van Sant, Richard SPL <Richard.J.Vansant@usace.army.mil>
Subject: RE: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Thanks Shanti, maybe I can call him tomorrow. Do you have any contact info for him? I'll connect with you and RJ before I call him.

David Castanon
Chief, Regulatory Division
U.S. Army Corps of Engineers, Los Angeles District

-----Original Message-----

From: Santulli, Shanti A. SPL
Sent: Tuesday, January 26, 2016 3:44 PM
To: Castanon, David J SPL <David.J.Castanon@usace.army.mil>; Cohen, Mark D SPL <Mark.D.Cohen@usace.army.mil>
Cc: Farrar, Corice J SPL <Corice.J.Farrar@usace.army.mil>; Fuderer, Gregory A SPL <Gregory.A.Fuderer@usace.army.mil>; Van Sant, Richard SPL <Richard.J.Vansant@usace.army.mil>
Subject: RE: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016 (UNCLASSIFIED)

It's true...this would be the 2nd controversial golf course/potential mitigation bank site in SD County. This one (at the Fallbrook Golf Club, which is just a few miles away from the Moosa Creek Mitigation Bank located at the former San Luis Rey Downs Golf Course in Bonsall) we don't have a prospectus for yet. RJ visited the site with the consultant, but we don't know if they are moving forward or not at this point.

I believe we've worked with Michael Harrison at Hunter's office in the past.

-----Original Message-----

From: Castanon, David J SPL
Sent: Tuesday, January 26, 2016 2:30 PM
To: Cohen, Mark D SPL <Mark.D.Cohen@usace.army.mil>; Santulli, Shanti A. SPL <Shanti.A.Santulli@usace.army.mil>
Cc: Farrar, Corice J SPL <Corice.J.Farrar@usace.army.mil>; Fuderer, Gregory A SPL <Gregory.A.Fuderer@usace.army.mil>; Van Sant, Richard SPL <Richard.J.Vansant@usace.army.mil>
Subject: RE: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Is this a second controversial golf course to bank conversion in S.D. County? I think we DID have a prospectus filed for the other one.

Who has been the Hunter aid that we have worked with in the past?

David Castanon
Chief, Regulatory Division
U.S. Army Corps of Engineers, Los Angeles District

-----Original Message-----

From: Cohen, Mark D SPL
Sent: Tuesday, January 26, 2016 12:29 PM
To: Santulli, Shanti A. SPL <Shanti.A.Santulli@usace.army.mil>
Cc: Farrar, Corice J SPL <Corice.J.Farrar@usace.army.mil>; Fuderer, Gregory A SPL <Gregory.A.Fuderer@usace.army.mil>; Van Sant, Richard SPL <Richard.J.Vansant@usace.army.mil>; Castanon, David J SPL <David.J.Castanon@usace.army.mil>
Subject: RE: Potential Congressional Inquiry?: FW: [EXTERNAL] Speaker Request for January 30, 2016

We would like a speaker from the Corps at the Library meeting, see details below.

Thank you!

Teresa Platt
Steering Committee Meeting
760-468-2025

=====

Join us for a meeting at the Fallbrook Library, Saturday, January 30th, 3 PM where you can learn all about this issue.

And mark your calendars: Fallbrook Community Planning Group Meeting, February 15th, 7 PM, Live Oak School, 1978 Reche Road.

Thank you for your support and spread the word!

Save Fallbrook Golf Course
Blockedwww.SaveFallbrookGolfCourse.com <Blockedhttp://www.savefallbrookgolfcourse.com>
2903 Lakemont Drive
Fallbrook, CA 92028
savefallbrookgolfcourse@gmail.com <<mailto:savefallbrookgolfcourse@gmail.com>>

CLASSIFICATION: UNCLASSIFIED
CLASSIFICATION: UNCLASSIFIED