

APPENDIX B
NOP COMMENT LETTERS AND CARDS



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
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San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



May 21, 2014

Mr. Jeff Dickman
Orange County Public Works
300 N. Flower Street
Santa Ana, CA 92703
jeff.dickman@ocpw.ocgov.com

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Santa Ana River Parkway Extension Project, Orange County, CA (SCH# 2014051008)

Dear Mr. Dickman:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Santa Ana River Parkway Extension Project Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program.

The Santa Ana River Parkway Extension Project includes the construction of a new class I bikeway, riding, and hiking trail, on the north and south banks of the Santa Ana River between Gypsum Canyon Road and the Orange County (County) boundary. As a part of the Santa Ana River Riding and Hiking Trail/Santa Ana River Class I Bikeway, it would connect a 2-mile gap in the County portion of the riding and hiking trail, and would extend to the San Bernardino County boundary. Three non-vehicular bridges would span the Santa Ana River as part of the project. Construction is anticipated to last 18 months beginning in 2017.

The Santa Ana River is used as a wildlife corridor for many wildlife species, particularly migratory birds, and many avian species use this area for breeding and nesting. In addition, compensatory mitigation for other development exists in proximity to the proposed project. The Department offers the following comments and recommendations to assist Orange County Department of Public Works (OCPW) in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

The Department is concerned that the proposed project may constrain and/or limit habitat and wildlife management of the Santa Ana Canyon as required by previous Department and other agency permits. In early 2002, the Department issued a CESA Incidental Take Permit and a Streambed Alteration Agreement to Orange County Flood Control for Prado Dam, Reach 9, and

Norco Bluffs Flood Control Improvement Project. The U.S. Fish and Wildlife Service also issued a Biological Opinion pursuant to the Federal Endangered Species Act. The permits required protection of the habitat and resources downstream of Prado Dam to Weir Canyon (Reach 9). They also required the development of a Habitat Management Plan (HMP) of Prado Dam, including specific information on downstream monitoring to ensure no future net loss of habitat within the Santa Ana River and to prevent additional take of least Bell's vireo.

Accordingly, the proposed project should not impact protected habitat, habitat that contains sensitive resources, or habitat targeted for restoration, nor should it result in a loss of riparian habitat. The DEIR should document the existing baseline acreage of habitat maintained below Prado Dam and analyze the effects of the additional infrastructure in the floodplain.

General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian corridors must be included in the DEIR and must compensate for the loss of function and value of a wildlife corridor.
 - a. The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.¹ Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.
 - b. The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.²

2. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b), (c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the DEIR.
 - a. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
 - b. A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

² A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

Biological Resources within the Project's Area of Potential Effect

4. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The DEIR should include the following information.
 - a. Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.
 - b. A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
 - c. A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
 - d. An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
 - a. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted

runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

- b. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
- c. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d. A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

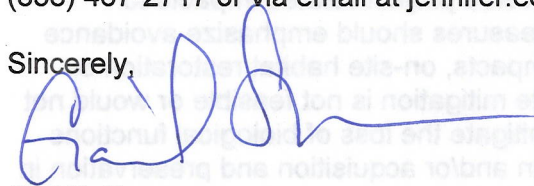
6. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
7. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
8. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of

birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

9. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
10. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Jennifer Edwards at (858) 467-2717 or via email at jennifer.edwards@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

cc: Joanna Gibson, Region 6
Christine Medak, U.S. Fish and Wildlife Service, Carlsbad
Scott Morgan, State Clearinghouse

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

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May 28, 2014

Mr. Jeff Dickman
OC Public Works Department (OCPW)
OC Planning
P.O. Box 4048
Santa Ana, CA 92702-4048

File: IGR/CEQA
Log #: 3817
SR-91

Dear Mr. Dickman:

Thank you for the opportunity to review and comment on the **Draft IS (IP 14-138) for the Santa Ana River Parkway Extension Project**. The proposed project is to construct a new Class 1 Bikeway, Riding and Hiking Trail and associated amenities on the north and south banks of the Santa Ana River between Gypsum Canyon Road Bridge and the Orange County boundary. The nearest state transportation facility to the project site is SR-91.

The Department of Transportation (Department) is a commenting agency on this project and has the following comment for your consideration:

The proposed "Staging Area" can only accommodate 24 vehicles and 5 horse trailers spaces. Since this is a popular bike trail/hiking area and off street parking is mostly prohibited, the 24 parking spaces may not be enough.

We recommend the increase of parking spaces in the "Staging Area" to accommodate the anticipated demands for parking. The inadequate legal parking spaces may encourage the drivers to park illegally which can result in increase law enforcement and other problems especially near the trailhead adjacent to Gypsum Canyon off-ramp.

Please continue to keep us informed of this project and any future developments that could potentially impact State transportation facilities. If you have any questions or need to contact us, please do not hesitate to call Betty Alivio at 949-724-2035.

Sincerely,

A handwritten signature in blue ink, reading "Maureen El Haraque".

MAUREEN EL HARAQUE, Branch Chief
Regional-Community-Transit Planning
District 12

c: Saied Hashemi, Traffic Operations North



DEPARTMENT OF PARKS AND RECREATION

Major General Anthony L. Jackson, USMC (Ret), Director

Inland Empire District
17801 Lake Perris Drive
Perris, CA 92571
ph (951) 443-2423
fax (951) 657-2736

May 23, 2014

Jeff Dickman
OC Public Works Department
OC Planning
PO Box 4048
Santa Ana, CA 92702-4048

Subject: Notice of Preparation for the Santa Ana River Parkway Extension Project
SCH #2014051008

Dear Mr. Dickman:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the aforementioned project. State Parks is a trustee agency as defined by the California Environmental Quality Act (CEQA). State Parks' mission in part is to provide for the health, inspiration, and education of the people of California by preserving the state's extraordinary biodiversity and creating opportunities for high quality outdoor recreation. As the office responsible for the stewardship of Chino Hills State Park (Chino Hills SP), we have an interest and concern about contemplated alterations of land use adjacent to and potentially in the park.

The proposed project has the vision to significantly increase human activity by creating a regional parkway. The potential alignment that would provide for a regional bike path north of the Santa Ana River has the potential to create a significant impact on wildlife movement by the increased human activity. If this bikeway alignment is carried forward, we suggest studying the carrying capacity of the trail improvements north of the Santa Ana River, to include Chino Hills SP. Also, currently we believe there is no legal access across the railroad tracks. For these reasons, we favor the southern alignment for the paved bike path. This southern alignment has the potential to link with the County of Riverside's latest proposal that would bring the bike path near the Green River Golf Course entrance at Green River Road. Also, the southern alignment may reduce project costs by eliminating the need for bridge #3 at Coal Canyon.

The location of the Coal Canyon Trailhead should be as far away from the wildlife corridor (freeway undercrossing) as possible in order to reduce impacts to wildlife movement. We recommend that the ramada currently located just east of the wildlife corridor be removed and the newly proposed trailhead be combined with the scenic view area. This multi-faceted facility should be located close to the proposed bridge location. We also request that interpretive elements include a Chino Hills SP map and other Park information. We are available to assist in providing the appropriate plant palette, sign information and other elements.

In the state park, the first 15 feet running north and south, adjacent to the bike path are designated as an easement. The design of the soft-surface trail should consider that vehicles will need access within the first 15 feet. The design should also consider the power poles located along the boundary. State Parks should be included when discussing specific design features such as fencing, which may affect wildlife movement in the Coal Canyon area.

Thank you again for coordinating this project with us. For further discussion, please contact me or Enrique Arroyo at (951) 453-6848.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Gill'.

Ryann Gill on behalf of
Kelly Elliott
District Superintendent
Inland Empire District

cc: DPR Natural Resources
State Clearinghouse
Judi Tamasi, WCCA
Claire Schlotterbeck, Hills For Everyone



South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 27, 2014

Jeff Dickman, Trail Coordinator
Orange County Public Works Department/OC Planning Services
300 N. Flower Street
Santa Ana, CA 92703

**Notice of Preparation of a CEQA Document for the
Santa Ana River Parkway Extension Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:


- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources



ORANGE COUNTY FIRE AUTHORITY

P.O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602

Keith Richter, Fire Chief

(714) 573-6000

www.ocfa.org

May 5, 2014

County of Orange
OC Public Works
Attn: Jeff Dickman
PO Box 4048
Santa Ana, CA 92702-4048

Ref: Santa Ana River Bike Trail

Dear Mr. Dickman,

The Orange County Fire Authority has reviewed the bike trail plan. The only comment OCFA has is that we request that there are trail markers to identify locations which correspond to a map. Trail markers are ways of identifying response locations during an emergency. (Whiting Ranch has an excellent trail marking system). In addition, OCFA would appreciate a trail guide with drivable access ways identified and would like to check on the ability to drive on the trail with a fire truck during emergencies.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michele Hernandez", with a stylized flourish at the end.

Michele Hernandez
Management Analyst
(714) 573-6199

Orange County Sanitation District

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Midway City
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Water District

May 29, 2014

Jeff Dickman
OC Public Works Department/OC Planning Services
P.O. Box 4048
Santa Ana, CA 92702

SUBJECT: Notice of Preparation for the Draft Environmental Impact Report for the
Santa Ana River Parkway Extension Project


This letter is in response to the Notice of Preparation for the Draft EIR for the Santa Ana River Parkway Extension Project. The proposed project will construct biking/hiking trails, non-vehicular bridges, design features, etc. along the Santa Ana River between Gypsum Canyon Road on the east, Orange/Riverside/SB county lines on the east, and between the railroad/La Palma Ave on the north and SR-91 on the south.

The cooperative project between the County of Orange, SAWPA, and the Orange County Sanitation District (OCSD) to relocate the SARI line is in the last phases of construction in this same area. The SARI line is operated and maintained by OCSD, as such; OCSD has some concerns that we would like addressed during the EIR process.

We would like to review the design and construction plans to confirm construction does not affect our facilities or our access to them. We must have access to the line at all times for maintenance purposes, avoiding manholes as much as possible is advised so that the trails are not blocked during those maintenance activities.

Please contact me for any questions or additional information needed. I can be reached at 714-593-7119 or via e-mail at dcovarrubias@ocsd.com

Thank you for the opportunity to review the subject document.



Daisy Covarrubias, MPA
Senior Staff Analyst

DC:sa
EDMS:003990710 /1.8b



Flores, Jerry

From: Catherine Lin <cyu@yorba-linda.org>
Sent: Friday, May 30, 2014 3:37 PM
To: Dickman, Jeff
Subject: NOP for SAR Extension Project and the OC Bicycle Loop

Hello Mr. Dickman,

I have been appointed as the staff person from City of Yorba Linda to compile all staff and commissioner comments regarding the Notice of Preparation for the SAR Extension Project and the OC Bicycle Loop. I am writing to inform that the City of Yorba Linda does not have significant concerns regarding the SAR Extension and the OC Bicycle Loop project that is underway. One commissioner from our Parks and Recreation Department noted that the location of staging area is too close to La Palma Avenue. However, no alternative location has been suggested.

Thank you for providing the City of Yorba Linda an opportunity to comment on the Notice of Preparation.

Catherine Lin, AICP

Assistant Planner

City of Yorba Linda

(714)961-7130

clin@yorba-linda.org

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JACK TANAKA

CITY OF DIAMOND BAR

JANE L. WILLIAMS

CITY OF LA HABRA HEIGHTS

May 23, 2014

Jeff Dickman
Orange County Public Works Department
OC Planning
P.O. Box 4048
Santa Ana, California 92702-4048

Notice of Intent to Prepare Draft Environmental Impact Report #619 for the Santa Ana River Parkway Extension Project

Dear Mr. Dickman:

The Wildlife Corridor Conservation Authority (WCCA) was created to provide for the proper planning, conservation, environmental protection and maintenance of the habitat and wildlife corridor between the Whittier-Puente Hills, Chino Hills, and the Cleveland National Forest in the Santa Ana Mountains. Thank you for the opportunity to comment on the Notice of Intent to Prepare Draft Environmental Impact Report (DEIR) #619 for the Santa Ana River Parkway Extension Project and Initial Study.

The proposed project is located at Coal Canyon, the last viable opportunity to maintain and enhance a critical ecological linkage between the Puente-Chino Hills and the Santa Ana Mountains (Noss, Beier, and Shaw). The Santa Ana Mountains and the Puente-Chino Hills contain biological resources of statewide and worldwide significance.

We support California State Parks' comments on this project. We are concerned regarding potential negative impacts to wildlife movement during construction and operation of the project due to the design of this project and its location in this ecologically sensitive area. We are also concerned with respect to any proposed hardening of the Santa Ana River and floodplain.

The EIR must include a map showing all property ownerships in the project area, as well as State Parks' property boundaries in relation to the project area. Any impacts to State Parks' resources must be clearly identified in the DEIR, and measures to avoid, minimize, and mitigate those impacts must be included.

The EIR must also clearly identify in figures and tables the acres of existing plant communities within the project area, and how many acres of each plant community will be temporarily impacted and permanently

Jeff Dickman, OC Public Works Department
NOI Santa Ana River Parkway Extension Project
May 23, 2014
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converted (including how much will be converted to impervious surfaces) by the project. It should include maps showing existing wildlife movement areas on and around the project site, with the canyons identified. The EIR must address what measures will be taken to ensure unimpeded wildlife movement through and around the project during construction and operation. Proposed fencing types and locations need to be clearly identified on a figure. In addition, the EIR must identify whether any night lighting will be used during project construction and operation. In the EIR, avoidance of potentially significant impacts must be demonstrated. Also, there must be iron-clad mitigation measures to offset any significant adverse impacts to wildlife movement, native plant communities, and other biological resources. Any proposed habitat restoration or preservation must be clearly identified on maps with a firm commitment for management and protection in perpetuity.

Cumulative impacts to biological resources should also be discussed, including those impacts associated with other related or nearby projects, such as the Santa Ana River Trail Improvements Project, located just east of this project (proposed by Riverside County Transportation Department, Work Order #ZC10642).

We appreciate your consideration of these comments. Please maintain our agency on your email/ mailing lists for this project. We look forward to reviewing the DEIR once it becomes available. If you have any questions, please contact Judi Tamasi of our staff by phone at (310) 589-3230, ext. 121, or by email at judi.tamasi@mrca.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Glenn Parker', with a stylized flourish at the end.

Glenn Parker
Chairperson

Reference

Reed Noss, Paul Beier, and William Shaw. Evaluation of the Coal Canyon Biological Corridor. Date unknown.



ORANGE COUNTY PUBLIC WORKS
300 N. FLOWER STREET
SANTA ANA, CALIFORNIA 92703

SANTA ANA RIVER PARKWAY EXTENSION PROJECT – DRAFT EIR PUBLIC MEETING
COMMENT CARD

Please hand in, mail, or e-mail comments to jeff.dickman@ocpw.ocgov.com by
May 30, 2014

(See mailing address on back of page)

Name: Eric Johnson
Organization (if any): Sierra Club
Address: 245 Verbena Lane
City, State, Zip: Brea, CA 92823
Phone (optional): 714-524-7763
E-mail (optional): eric.sj@mindspring.com

Comments:

- Study the effects of this project on Wildlife movement.
- Determine the need for protective fencing near the freeway that can also serve as a fire protective barrier from the freeway.

Flores, Jerry

From: Frank Colver <fcolver@znet.com>
Sent: Friday, May 23, 2014 9:00 AM
To: Dickman, Jeff
Cc: 'Denny Bean'; 'Frank Colver'; 'Gerald London'; 'Ken Agid'; 'Lauren Ficaro'; 'Max Swancutt, DDS'; 'Peter Wetzell'; 'Shaw, Tim'; 'Vincent Buck'; Ray Hiemsta
Subject: My comments toward the Santa Ana River Parkway Project planning.

Good morning Jeff, coming to you from my desert cabin are my comments for the SAR Parkway Project planning:

Many urban rivers are being rediscovered recently as great resources for non-motorized boating recreation and riparian habitat restoration (the two work well together). The Los Angeles River is a prime example where the habitat is being restored and concurrently the public can boat a certain portion of the watercourse. When the public can paddle down a river, without driving hundreds of miles to get there, it becomes something close to their hearts (and good ecology). Many volunteer groups form to periodically clean and remove trash from the river corridor and bring to the governing agency any problems they see. They can also help with restoration projects. The Santa Ana River (SAR), in Santa Ana Canyon is just such an excellent resource example and should be utilized as such.

Because of the local presence of the ocean bays, Orange County has a large population of paddle boaters in kayaks, canoes, and small rafts. The SAR, in the canyon, will someday be open to non-motorized pleasure boating, it is not a matter of if, it is just a matter of when. When urban rivers are available for floating recreation it is commonly referred to as a "Water Trail". It becomes the water equivalent of the land trails for walking, biking, and equestrian use, but the paddle craft are the mode of transportation.

In the planning for the Santa Ana River Parkway Project, a place for boat access and egress should be included now. In river boating terms these locations are referred to as the "put-in" and "take-out" points. This should be done at this time rather than having to add these access facilities after the project is done and the river eventually becomes a public recreation resource. It would be much better and less expensive to include these facilities in the project now. All that needs to be done is to identify the best put-in and take-out locations and plan for boat access. Boats could be carried a short distance from a dirt parking area accessible from a road. In my estimation the put-in would be near Green River and the take-out at or near Yorba Park well above the first weir. Warning signs could be placed there to direct boaters to get off the river because of a hazard downstream. In summary; two basic locations need to be identified and added to the planning. These would be the auto access with parking, plus the actual put-in and take-out on the river bank. The latter would be nothing more than a sloping dirt bank with foot trail access.

The river will someday be opened to public water recreation, that actuality needs to be planned for now, not after this project is complete.

Sincerely,

Frank Colver

Newport Beach

Flores, Jerry

Subject: FW: NOP Santa Ana River Parkway

From: wetzer@aol.com [<mailto:wetzer@aol.com>]

Sent: Tuesday, May 20, 2014 11:29 AM

To: Dickman, Jeff

Subject: NOP Santa Ana River Parkway

I am writing to comment on the NOP for the Santa Ana River Parkway and have two comments:

1. While this parkway is a jewel for our county and region, please pay careful attention to flora used in landscaping. As our climate becomes drier and hotter, we should balance shade-producing trees which may suck water from the stream with drought-tolerant vegetation which retains the native ambiance. No need for massive replanting; let's make use of what nature provided.
2. In developing this plan and resource, we should look to areas such as Los Angeles' work on the Los Angeles River and plan for inclusion of water recreation as part of the plan. Canoeing and kayaking opportunities should be incorporated into the plan while protecting bird nesting areas.

Peter Wetzel
7217 E. La Cumbre
Orange, CA 92869
wetzer@aol.com

Flores, Jerry

From: Tim Wood <twood@extron.com>
Sent: Friday, May 02, 2014 10:48 AM
To: Dickman, Jeff
Cc: tim.wood@ishootrunners.com
Subject: EIR #619 for the Santa Ana River Parkway Extension Project Feedback

Jeff,

My name is Tim Wood and I am both a resident of the area impacted by the project, and a heavy user of the project. As a resident, I fully endorse the creation and maintenance of the pathway as it improves the beauty and quality of the area.

I've been using the current bike path for over 25 years. I typically run from my house on Aragon Way to what was the Coal Canyon undercrossing (and back), two to three times a week, as well as bike and walk it (with dog) on occasion. I've seen all of the changes over the years (the removal of the BMX park, the conversion of the undercrossing, the flooding of golf course, etc.), and have a deeply vested interest in this section of the path.

I've been a witness to the sewer project over the last two years; I was distressed to see the clear cutting of the river bed recently. It appears that plan is to re-enforce the river bed in order to reduce erosion – I sincerely hope that it's done with the absolute minimum amount of concrete as possible. I'm struck with the irony that there is a major effort underway to return the LA River to a more natural state at the same time that the opposite appears to be happening here with the Santa Ana River. I hope not. I'm hopeful that all of the vegetation that has been removed is fully restored.

The current temporary bike path is less than desirable for a couple of reasons (with suggestions for the new pathway):

1) It's tightly bordered by a chain-link fence, which makes it dangerous (can catch a bike handle when passing people) and unaesthetic.

It's highly desirable that the new pathway use fencing ONLY when absolutely necessary, such as to protect users from falling into the river, and to protect wildlife (especially mountain lions) from accessing the freeway.

2) It's too narrow; passing others is a hazard, and walking or running with a dog is dangerous for all.

It's desirable that the new pathway width be appropriate to the topology of the route – wider on the uphill and downhill at Coal Canyon as bikers gain speed and need more room - narrower elsewhere.

3) It extends too far into the river bed area, thus taking up valuable wildlife habitat.

It's highly desirable to reduce as much as possible any further encroachment on the wildlife habitat of the river bed.

4) There are no trashcans other than the one at Canyon RV Park. In fact, the bike path between Gypsum Canyon and Weir Canyon has exactly one trash can (just west of the Yorba de Lomas East signal). As runner with a dog, you know these things.

It's desirable to have trashcans and dog waste stations on the pathway. There is a higher propensity for dog owners to clean up after their animals if they can easily dispose of it. Trust me, it's not that fun to carry a bag of poop a couple of miles while running.

5) The current path has no dirt border for runners.

Runners prefer packed dirt over pavement (as in done from Gypsum Canyon west on the current bike path), however, it must be planned judiciously as it potentially further encroaches on the wildlife habitat area

Not in the scope of this project, but worth noting nonetheless:

1) It would be a significant improvement to have a branch of the Pathway cross over the river to the Chino Hills State Park. This could be done at the edge of Green River Golf course or by way of the golf course entrance. This would dramatically increase use of the State Park by runners, mountain bikers and hikers.

2) It would be desirable to include informational signs at Coal Canyon explaining areas of interest in Coal Canyon (the waterfall, the Tecate Cypress Trees, etc.)

I cannot attend the hearing on the 10th, but if you have any questions about my comments or want further details, please contact me.

Thank you for the opportunity to provide feedback.

Tim Wood

25540 Aragon Way

Yorba Linda, CA

92887

Cell: (714) 264-5122

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