



DEPARTMENT OF PARKS AND RECREATION

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

Ruth Coleman, Director

Agenda Item IX  
WCCA  
7/20/11

July 11, 2011

Aaron Burton  
Caltrans, District 8  
464 West 4<sup>th</sup> Street  
San Bernardino, CA 92401

Re: Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) for the State Route 91 Corridor Improvement Project. SCH# 2008071075

Dear Mr. Burton:

The Inland Empire District of the California Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the State Route-91 Corridor Improvement Project (SR-91 CIP).

State Parks is a Trustee Agency as defined by the California Environmental Quality Act (CEQA). State Parks is also a Responsible Agency as defined by CEQA because the proposed project will require permanent and temporary use of Chino Hills SP (CHSP). 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.

In general, the DEIR/EIS is deficient because of the lack of serious consideration given to park resources and to recreation. It is not possible to evaluate the effectiveness of the project's consequential impacts without weighing the proponent's mitigation measures. In this case, Caltrans does not offer sufficient concrete mitigation strategies for the direct and indirect significant impacts to CHSP and its resources. As indicated in our October 23, 2009 Section 4 (F) Consultation response, very comprehensive review studies are needed to properly evaluate all potential impacts and mitigation measures which the DEIR/EIS as written is deficient in addressing. That being said we have the following comments to offer on the document as it has been released at this time; they are as follows.

Chapter 3.17 Natural Communities

- NC-3 - The dates identified for vegetation removal and tree trimming restrictions are different in Orange County than they are in Riverside County. Please explain and justify this difference.
- NC-4 – Due to fire danger no mechanized equipment operation or operation of other equipment that may throw sparks or potentially start a fire is to take place within the limits of CHSP during days when the national weather service has issued a Red Flag Warning for the area. We recommend this provision for all work adjacent to natural open space.
- NC-7 – Areas of habitat to be disturbed at Coal Canyon are described however it is unclear exactly where and the extent of these areas. Please identify and describe the nature of the disturbance that will take place within the CHSP at Coal Canyon.

- NC-9 & 12 – State Parks is strongly opposed to any work taking place at night within CHSP except in the case of emergency.
- NC-14 – All staging areas at Coal Canyon or at other areas of CHSP should be delineated with silt fence to prevent lizards and rodents from entering the staging area. The San Diego horned lizard a California species of special concern has been observed in the area around Coal Canyon by State Parks staff recently.

#### Chapter 3.19 Plant Species

- Coulter's Matilija poppy is known to occur within the BSA in CHSP at Coal Canyon. Please indicate whether this population will be disturbed by the project.

#### Chapter 3.20 Animal Species

- AS-7 – This Avoidance and Minimization and/or Mitigation Measure repeatedly refers to roosting habitat but does not specify whether it is referring to bat habitat as is described in several of the previous measure or bird habitat. Please clarify.

#### Chapter 3.21 Threatened and Endangered Species

- Coastal Sage Scrub habitat adjacent to the project is known to be occupied by California gnatcatchers within CHSP at Coal Canyon. It is unclear what the anticipated impacts to gnatcatchers are at this location. Please clarify and describe plans to avoid and/or mitigate these impacts.

Additionally, we have not received the application for formal consultation with the National Park Service as required by the Land and Water Conservation Fund provisions. Once we receive your application, we will have additional comments that will affect our position on the appropriateness of the DEIR. We will also have further comments and conditions when applying for the Right of Entry permit for the areas marked out for temporary construction easement.

We are concerned with impacts to any sensitive species. The DEIR/EIS references several times that impacts will be mitigated consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). However the DEIR/EIS fails to identify the specific mitigation measures that would be implemented. Additionally, the DEIR/EIS is vague or does not clarify how mitigation consistent with the MSHCP will apply to the Orange County portion of the project.

Coal Canyon Wildlife Under-Crossing is a critical and very significant link to sustain the biodiversity of wildlife resources regionally. As stated, the DEIR/EIS is deficient in analyzing potential impacts to sensitive species and wildlife movement at this location and other identified wildlife crossings to the east, thus preventing a proper evaluation and weighing of the proposed mitigation measures. For instance, types of sound walls should be studied and evaluated on the eastbound and westbound sides of SR-91 at Coal Canyon and throughout the Santa Ana Canyon for the following reasons. Widening the freeway will move traffic closer to open space where increased noise pollution and the strobe light effect of headlights on the freeway will impact wildlife movement which takes place primarily at night. The sound walls would also help prevent vehicle fires, exhaust pipe emissions or discarded burning materials from igniting wildfires in open space. Widening of the freeway toward the south will reduce the height of the open area between the freeway and ground thereby reducing the "openness" of the

undercrossing making it less attractive to wildlife. Also, as a mitigation measure, we strongly advocate the addition of native plant habitat on the north/south approaches and under the SR-91 Bridge to facilitate wildlife movement.

We recommend further consideration of the reversible lane alternative and the elevated structure within the SR-91 right-of-way alternative, both of which were discussed as possible solutions during the Major Investment Study process, and included in a Locally Preferred Strategy, Project Development Team Meeting on December 7, 2005. The DEIR/EIS falls short of serious consideration of minimal-build alternatives.

State Parks will continue to work with RCTC and Caltrans to minimize the project impacts and identify appropriate mitigation to address impacts to CHSP.

Thank you again for the opportunity to comment. For further discussion, please contact me or Enrique Arroyo at (951) 453-6848.

Sincerely,



Ron Krueper  
District Superintendent

Exhibit A: State Parks October 23, 2009 Section 4 (F) Consultation Response Letter

cc: Jay Chamberlin, State Parks Natural Resources Chief  
Judi Tamasi, Wildlife Corridor Conservation Authority



DEPARTMENT OF PARKS AND RECREATION

Ruth Coleman, Director

Inland Empire District  
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October 23, 2009

Khalid Bazmi  
Toll Project Manager  
3850 Vine Street, #210  
Riverside, CA 92507

Re: Section 4(f) Consultation regarding the State Route 91 Riverside to Orange County Corridor Improvement Project

Dear Mr. Bazmi:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to participate in the Section 4(F) Consultation process regarding the State Route-91 Riverside to Orange County Corridor Improvement Project (SR-91 CIP).

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 the park. The long-term health of CHSP is dependent on the health of the regional ecosystems because the biotic boundaries of the park extend beyond its jurisdictional boundaries.

Consistent with the requirements of Section 4(f), the Riverside County Transportation Commission (RCTC) and the California Department of Transportation (Caltrans) have consulted with State Parks regarding the proposed SR-91 CIP and its potential effects on Chino Hills SP. State Parks has reviewed the information regarding Chino Hills SP provided in the Draft Section 4(f) and 6(f) Evaluation for the project and the list of questions State Parks was requested to consider in its review of the information regarding Chino Hills SP. Based on the questions provided by RCTC/Caltrans and the additional information provided at and after the consultation meeting in the June 2009 project consultation, State Parks is providing the following additional information for possible inclusion in the Draft Section 4(f) and 6(f) Evaluation for the SR-91 CIP:

- **Summary of Section 4(f) Analysis for Chino Hills State Park** - see attachment for suggested edits.
- **Coal Canyon Wildlife Under-Crossing** – Even though construction in the wildlife crossing will be limited to daylight hours and the construction impacts are considered temporary with the widening of the bridge structures, wildlife movement will still be undeniable impacted over an extensive period of time. Previous bridge widening projects at Coal Canyon coupled to this bridge widening project will have incrementally increased the shade area under the

bridges effecting wildlife without the benefit of any native plant cover improvement to facilitate movement directly under or near the under-crossing approaches. This should be considered as a permanent impact and should be mitigated as such for the long term. We strongly encourage a very comprehensive review and study of all permanent and temporary impacts with appropriate mitigation such as native plant improvements other than only returning the present wildlife crossing to its original condition which is currently bare ground where the previous road material was removed.

- **Prado Road and Green River** - The proposed permanent aerial easement for the new bridge over Prado Road at Green River Road impacts and crosses over the parks only existing public access point for hikers and vehicles in this southern portion of Chino Hills SP. Extensive consultation and planning coordination and possible mitigation will need to be conducted with State Parks to ensure future public access.

In summary:

- State Parks appreciates the continuing coordination and consultation with RCTC and Caltrans regarding the proposed project.
- State Parks will continue to work with RCTC and Caltrans to minimize the project impacts to Chino Hills SP and identify appropriate mitigation to address impacts to Chino Hills SP.

Thank you again for the opportunity to comment. For further discussion, please contact me or Enrique Arroyo at (951) 453-6848.

Sincerely,



Ron Krueper  
District Superintendent

cc: Rick Rayburn, California State Parks  
John Rowe, California State Parks  
Judi Tamasi, WCCA  
Jim Donovan, National Park Service  
Daniel Ciacchella, Caltrans  
Michael Amling, LSA Associates, Inc.