



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

June 26, 2012

Hardat Khublall
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

Re: Assessment of Impacts Associated with the Santa Ana River Interceptor Rock Removal Project (Draft Report)

Dear Mr. Khublall:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to review and provide comments on the above-mentioned document. State Parks is responsible for preserving the terrestrial flora and fauna at Chino Hills State Park, which was specifically acquired in large part to protect the richness of the Chino Hills from development. That biological diversity is expressly linked to the protection of wildlife corridors ("biocorridors") both within the park and linking the park to other protected areas. This natural resource function was clearly identified as a purpose of the park, and is discussed at great length in the Chino Hills SP General Plan (1999), which describes the significant park resources in pertinent part as:

"The identification and management of areas containing representative, sensitive or otherwise important habitats within the park and the biocorridors that link these habitats to those outside of the park, are essential to the maintenance of the park and regional ecosystems." (emphasis added)

State Parks understands that the permit authorizing placement of rip rap in areas adjacent to Coal Canyon indicates removal of all rip rap. For reasons discussed below, we disagree with the conclusions of the Draft Report that recommend leaving rip rap, including on the banks of the Green River Golf Course opposite Coal Canyon.

Coal Canyon is the cornerstone of the Puente-Chino Hills Wildlife Corridor. If this wildlife corridor is impaired from completely functioning, the rest of the corridor will breakdown as well. State Parks has been taking steps to enhance and improve conditions for wildlife movement at and through Coal Canyon to the surrounding open space. This includes habitat restoration projects and reduction and removal of infrastructure when possible. Orange County Sanitation District's installation of rock rip rap to protect the SARI line does not improve conditions for wildlife movement in this area. OCSD has presented limited research indicating that the rock rip rap installed will not inhibit wildlife movement at Coal Canyon if left in place. State Parks does not agree. OCSD's US Army Corps of Engineers permit allowing the installation of the rock protection of the SARI line, conditions OCSD to remove all of the rock from the river floodplain once the SARI line is relocated and the protections are no longer necessary. State Parks supports the removal of rock from the

Santa Ana River Flood Plain or a project proposal to cap the rock so that it will allow uninhibited movement across the installed rip rap by deer and other wildlife species.

On Page 7 of the Assessment OCSD seems to discount observations of least Bell's vireo by the Santa Ana Watershed Association (SAWA) within the project area for a number of reasons which seem to be associated with lack of information on the part of OCSD. State Park's experience is that SAWA maintains qualified, skilled staff who's data collection and record keeping methods are standardized and follow industry accepted protocols. State Parks suggests that OCSD contact Sue Hoffman, Lead Biologist for SAWA, directly to get a definitive response to its concerns before discounting SAWA's findings.

On page 8 OCSD addresses potential impacts to California gnatcatcher and states that because the species does not occupy the riparian vegetation type, rock removal will not have any impact on this species. Access routes to the rock removal sites traverse coastal sage scrub habitat known by State Parks to be designated habitat for and occupied by California gnatcatchers. State Parks recommends that all access routes through or immediately adjacent to coastal sage scrub habitat types be surveyed for California gnatcatcher prior to use and avoidance measures be established should gnatcatchers be documented.

On page 9 under the heading Wildlife Corridor OCSD comments that deer moving in a northerly direction from the 91 Freeway have 180 degrees of open space to select travel routes to the hills within the State Park. This is only partially true. Deer may have many alternative routes for north bound movement however nearly vertical banks of the Santa Ana River, infrastructure associated with the bike path, golf course, freeway and railroad provide a setting in which there are relatively few preferred routes where they might cross the Santa Ana River. The site where the rock rip rap is placed at the northeast corner of State Park's North Coal Canyon Parcel is intuitively the preferred route due to limited infrastructure and grade as deer move from the upland areas to the river channel. State Parks agrees that movement from the Park southbound toward the Cleveland National Forest is limited as well, and as such supports OCSD taking all available steps to provide for functional passage in both directions by removing as much rock as possible or applying a cap to any rock rip rap left in place.

On page 18 under the heading IV.3 Wildlife Corridor, OCSD reports they found no literature that definitively indicates the type of rock rip rap used to armor the SARI line presents an impediment to the movement of deer species. A single study is referenced but does not make a specific correlation as to how that study applies to the sites on the Santa Ana River. State Parks feels this represents a lack of publicly available research on this topic. It is not yet determined that rock rip rap will not inhibit or alter preferred routes of movement by deer and other wildlife attempting to cross the Santa Ana River in the vicinity of Coal Canyon. It most definitely does not improve conditions as is the primary goal of State Parks in this area. The alternative to leave rock rip rap in place on the banks of the Santa Ana River leaves a potential impediment in place in an area which OCSD indicates is already seriously restricted (i.e., the existing railroad steel wall/fence). An alternative that removes or caps the

rock would eliminate the rock rip rap as a potential added impediment and would be preferred by State Parks.

We understand that gaining access to the Rock Rip Rap Area #5, south side of the Santa Ana River, may involve travelling through a portion of Chino Hills State Park. Should this be the case, please allow at least three months prior to the start of construction for us to review your request for a Right of Entry permit. However, the sooner the better to avoid any delay.

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: Christine Medak, USFWS
Judi Tamasi, Wildlife Corridor Conservation Authority