



DEPARTMENT OF PARKS AND RECREATION

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

Chino Sector Office

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Serving California Citrus SHP and Chino Hills SP

Agenda Item XII
WCCA
8/14/13

August 5, 2013

Albert Martinez

Riverside County Flood Control and Water Conservation District

1995 Market Street

Riverside, CA 92501

Subject: Brineline Protection Project Mitigated Negative Declaration,
SCH # 2013071020

Dear Mr. Martinez:

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). Since a portion of this project occurs within Chino Hills State Park, State Parks will assume the role as a Responsible Agency, as defined by 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 within and adjacent to the park.

The following are our comments on the MND. Some comments we made on the administrative draft in October 2012 appear unaddressed.

Cultural Resources

Please cite your sources for determinations made regarding cultural resources.

Hours of Operation

We consider the project area not only important wildlife habitat but also a part of a wildlife corridor area that supports a wide variety of animal life whose activities occur during periods of darkness, daylight and/or both. Therefore, hours of operation in the park are limited to daylight only. Written approval will be required in advance of any work occurring during hours of darkness.

Recreational Trail Access

As stated in the document, access on the East Santa Ana River Trail will be maintained not just for emergency and patrol, but also for others having easements, such as utilities and for park visitors. Recreational access must be maintained throughout the project. Please provide the potential detour routes clearly shown on a map. Any proposed detours should also consider impacts related to providing alternate access.

High Fire Danger

The project area is in proximity of the origin of the 2008 Freeway Complex Fire and therefore is in what we consider a high fire danger area. We also have stringent fire safety precautions that we follow and impose on entities conducting projects within our parks. Those precautions include items such as having separate fire watch personnel to manage appropriate equipment for the entire duration of all equipment operation. We also require no work during red flag warning days, however, we can discuss fire preventive measures to avoid complete shut down on those days.

Erosion

Trees and tree sized shrubs can be so severely impacted from disturbance of more than 15% of their root zones to cause permanent damage or death. We would consider this a significant impact. We also have questions. What will you do when erosion occurs to expose the sheet pile? How much erosion will you allow to occur before you take action to repair it? We are concerned about what will happen during a big El Nino or mandated release from the dam when the sheet pile gets exposed. We expect impacts to aesthetics by exposure of structures. We also expect such events will create a wildlife crossing barrier for many species, from fish trying to get into Lower Aliso Creek for refugia (like the Santa Ana sucker), to reptiles, amphibians, insects other species depend on, small mammals and, potentially, large mammals if the erosion is many feet high.

Fish Movement

In Section Bio-D the MND states that the project will not impact any native or migratory fish. Aliso Creek is known to be occupied by native arroyo chub and is identified by the USFWS as refugia for the Santa Ana sucker. The MND should address specifics of how the project will maintain connectivity to the Santa Ana River for these species during project construction and describe methods to avoid impacts to their potential movement in and out of Aliso Creek.

Loss of Habitat

We recognize the vegetation in the project area is not high quality due to the non-native grasses, easement road and bike trail access in the area. However, it still provides habitat for a wide variety of species. Any temporary loss of habitat is viewed as a significant impact. At a minimum, site restoration with local native plants will be required and should include a five year monitoring period. We will require approval of the plant palette for all vegetation.

Environmental Sensitivity Training for Contractors

State Parks requests that an environmental sensitivity training be provided to all staff working on the project, explaining all avoidance and mitigation how they are to be implemented and maintained, and describing the sensitivities of working in a State Park as opposed to any other project site. State Parks will be available to assist with the development of the curricula for the training. When new contractors or staff start work on the project they should receive this training as well.

State Parks Emergency Response Plan

As mentioned in our comments last year, State Parks has an emergency response plan that is available for your review and that the project will be subject to.

Section Views

Please provide a cross section of the project to show the amount of land between the sheet pile and the river.

Hydrology

State Parks is concerned that hydrology may be affected. Groundwater recharge on both sides of the sheet pile will be affected at least for some distance. The soil under the road will be wetter and the zone just south of it will be drier, possibly enough to affect the long-term health of the plants there especially with climate change. Many of those plants have root zones that are not that deep and if we have successive years of less than average rainfall, surface soils will be drier just south of the wall at least down a few feet.

Traffic Control Plan

We will require approval of the Traffic Control Plan.

Coast Horned Lizard

State Parks staff, including biologists, have observed the coast horned lizard in the project area in the past. Focused surveys should be conducted and measures taken to avoid impacts, such as temporary barriers and preconstruction surveys which will relocate any horned lizards found outside the construction footprint. Identification and avoidance measures for horned lizard should be included in all environmental sensitivity trainings provided.

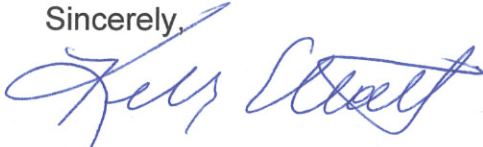
Chino Hills State Park General Plan

The Chino Hills SP General Plan, which can be found at <http://www.parks.ca.gov/pages/21299/files/chino%20hills%20finalgp.pdf> provides the

only land use Management Zones that govern land within the park. The park exists primarily to preserve the natural landscape features, its biological diversity, and low impact recreation. Please provide a discussion as to how the project is in conformance with the CHSP General Plan.

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 "Kelly Elliott", written in a cursive style.

Kelly Elliott
Chino Sector Superintendent
Inland Empire District