

2.0 INTRODUCTION

2.1 PURPOSE OF THIS DRAFT EIR

2.1.1 AUTHORITY

This Draft Environmental Impact Report (Draft EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000, *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, §§ 15000, *et seq.*). This Draft EIR assesses the potential impacts associated with the Santa Ana Parkway Extension Project (proposed project). The Orange County Public Works Department (OCPW) is the Lead Agency for the proposed project pursuant to CEQA.

As stated in Section 15121 of the CEQA Guidelines, an Environmental Impact Report (EIR) is an informational document which will inform decision-makers, public agencies, and the general public about the potential significant environmental effects of a project. It also identifies possible ways to minimize the significant adverse effects of the project and addresses reasonable alternatives to a project. CEQA requires that an EIR contain, at a minimum, the following elements:

- Executive Summary
- Project Description
- Environmental Settings, Impacts, and Mitigation Measures
- Alternatives to the Project
- Growth Inducing Impacts
- Cumulative Impacts
- Effects Not Found to be Significant
- List of Preparers

2.1.2 PREPARATION OF THE DRAFT EIR

This Draft EIR was prepared pursuant to Section 15161 of the CEQA Guidelines which states that a project EIR

“...examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all the phases of the project including planning, construction, and operation.”

This Draft EIR analyzes the reasonably foreseeable environmental consequences anticipated to occur from the construction and operation of the proposed project.

2.1.3 INCORPORATION BY REFERENCE

In its analysis, this Draft EIR relies upon previously adopted regional and statewide plans and programs, agency standards, and background studies such as the City of Yorba Linda General Plan, Municipal Code, and Noise Ordinance, Orange County General Plan, Municipal Code, and Noise Ordinance, and the South Coast Air Quality Management District’s (SCAQMD) CEQA Air Quality Handbook. Whenever existing environmental documentation or previously prepared documents and studies are used in the preparation of this Draft EIR, the information is summarized for the convenience of the reader and incorporated by reference. In addition, each section which relies upon previously adopted plans, programs, environmental

documentation, and background studies notes how it specifically relates to the proposed project and that the information has been reconfirmed. In accordance with the CEQA Guidelines, Section 15150(b), these documents in this Draft EIR will be made available to the public for inspection at OCPW. In addition, these documents and other sources used in preparation of this Draft EIR are identified in Section 12.0 (References).

Technical studies and reports prepared for the proposed project are included in the Appendices of this Draft EIR and are considered part of the EIR.

2.1.4 INTENDED USES OF THE EIR

The EIR process is specifically designed to facilitate an objective evaluation of the significance of a project’s direct, indirect, and cumulative impacts on the environment; provide an analysis of project alternatives; identify measures that would mitigate significant adverse impacts of a project; and provide implementation methods for such mitigation measures. Simply because the EIR addresses a particular issue does not mean that the issue causes a significant adverse impact to the environment. Impacts from the proposed project may not have a significant effect on the environment, but analysis regarding such matters is included to support the conclusions set forth in this Draft EIR.

This Draft EIR is intended to be used as the CEQA review for the approval and implementation of the proposed project, including the infrastructure and facilities described in Section 3.0 (Project Description) of this Draft EIR. See Table 2-1 below for a list of permitting agencies, some of whom may use this Draft EIR for their approvals.

The Orange County Board of Supervisors acting as governing body of OCPW will be responsible for certification of the Final EIR.

2.1.5 AGENCIES HAVING JURISDICTION/POTENTIAL DISCRETIONARY ACTIONS

OCPW, as the Lead Agency for this Draft EIR, has discretionary authority over the project approval. Other responsible agencies have also been identified, consistent with Section 15381 of the CEQA Guidelines, and are listed with their associated project permit/approval in Table 2-1. Responsible agencies are anticipated to use this Draft EIR in their decision making and permitting processes related to implementation of the proposed project.

**TABLE 2-1
LIST OF POTENTIAL RESPONSIBLE AGENCIES OR AGENCIES WHO WILL ISSUE PERMITS OR APPROVALS**

AGENCY	APPROVAL/PERMIT
Federal Agencies	
United States Army Corps of Engineers (ACOE)	<ul style="list-style-type: none"> • Clean Water Act, Section 404 permit*
State Agencies	
California Department of Fish & Wildlife (CDFW)	<ul style="list-style-type: none"> • Section 1602 Streambed Alteration Agreement
Department of Parks and Recreation (State Parks)	<ul style="list-style-type: none"> • Consultation and approvals of project plans and planting plan

**TABLE 2-1
LIST OF POTENTIAL RESPONSIBLE AGENCIES OR AGENCIES WHO WILL ISSUE PERMITS
OR APPROVALS**

AGENCY	APPROVAL/PERMIT
Regional Water Quality Control Board (RWQCB) – Santa Ana	<ul style="list-style-type: none"> • Federal Clean Water Act Section 401 Water Quality Certification • National Pollutant Discharge Elimination System (NPDES) permit/notification • Storm Water Pollution Prevention Plan (SWPPP)
County Agencies	
Orange County Board of Supervisors	<ul style="list-style-type: none"> • Certification of the EIR
Orange County Parks	<ul style="list-style-type: none"> • Encroachment Permit
Orange County Public Works	<ul style="list-style-type: none"> • Encroachment Permit
Regional and Local Agencies	
South Coast Air Quality Management District (SCAQMD)	<ul style="list-style-type: none"> • Form 400CEQA – for Air Quality Impacts

Source: AECOM (2015).

Note: As a federal agency, the ACOE does not have a CEQA compliance obligation. But, this agency is expected to issue permits for the proposed project and may rely on the information in the EIR as part of their permit processes.

2.1.6 AVAILABILITY OF THE DRAFT EIR

Agencies, organizations, and individuals wishing to comment on the information presented in this Draft EIR may do so during the 45-day public review period. All written comments on this Draft EIR will be addressed in the Responses to Comments Report to the extent required by CEQA. The Responses to Comments Report will be presented to the Orange County Planning Commission for review at a public hearing. The Responses to Comments Report will also be part of the Final EIR and will be presented to the Orange County Board of Supervisors for its consideration of this Draft EIR and the proposed project.

Copies of this Draft EIR and relevant technical studies are available for review during regular business hours at the following locations:

OC Public Works
300 N. Flower Street, Lobby
Santa Ana, CA 92703

Green River Golf Club-Golf Shop
5215 Green River Road
Corona, CA 92880
(951-737-7393, ext. 4)

City of Yorba Linda
Parks and Recreation Counter
4845 Casa Loma Avenue
Yorba Linda, CA 92885

East Anaheim Branch
8201 E. Santa Ana Canyon Road
Anaheim Hills, CA 92808

It should be noted that this Draft EIR will be made available on OC Planning’s website: http://ocplanning.net/planning/land/projects/santa_ana_river_parkway_extension_project.

2.2 METHODOLOGY

Each environmental parameter discussed in Section 5.0 of this Draft EIR is organized and analyzed as discussed below.

2.2.1 EXISTING CONDITIONS

This section describes the existing environmental conditions on the project site and in the vicinity of the project site. Normally, the existing conditions are described as they existed at the time the Notice of Preparation (NOP) was published and they constitute the baseline physical conditions against which OCPW (Lead Agency) determines whether an impact is considered significant and adverse. Lead agencies may elect to use a different baseline if there is a reasonable basis for doing so. As described in more detail in the individual sections, for some topics, such as traffic, biological resources, and air quality, the existing conditions rely in part on monitoring or counting that is conducted annually and thus reflects the most recent monitoring results. Wherever the environmental setting or existing conditions differ from the conditions at the time of the NOP, the reasons for the differences are summarized and/or described.

2.2.2 THRESHOLDS OF SIGNIFICANCE

Thresholds of significance which are the basis for determining the significance of proposed project impacts are presented in this section of this Draft EIR. In general, OCPW has determined that the questions in CEQA Guidelines Appendix G (January 2014) constitute appropriate thresholds for determining whether impacts are significant or not.

2.2.3 METHODOLOGY RELATED TO EACH ENVIRONMENTAL PARAMETER

The procedures and models used to analyze impacts of the proposed project on each environmental parameter are presented in each individual environmental topic in this Draft EIR. The appropriate scientific analyses and methods are described.

2.2.4 ENVIRONMENTAL IMPACT ANALYSIS

The environmental analysis for each environmental parameter for which the proposed project may or would result in potentially significant adverse impacts is contained in this section of this Draft EIR. These environmental parameters (agriculture resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, recreation, and transportation and traffic) were based on the CEQA Guidelines Checklist, the scoping process, and responses to the NOP.

2.2.5 MITIGATION MEASURES

If the analysis contained in the environmental impacts section concludes that the proposed project will cause significant adverse impacts on the environment, mitigation measures are identified in this section to minimize or eliminate the significant adverse impacts. Mitigation measures are the mechanisms that reduce, avoid, minimize, or compensate for the potential impacts. Mitigation measures may include standard conditions based on local, state, or federal regulations, or other additional measures specific to the project site circumstances.

2.2.6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

This section identifies unavoidable significant adverse impacts which cannot be mitigated or that remain significant even after mitigation is incorporated in the proposed project. If significant unavoidable adverse impacts are identified, the Orange County Board of Supervisors acting as governing body of OCPW must determine if the benefits from implementing the proposed project outweigh and override the

unavoidable adverse effects created by the proposed project. If so, the Orange County Board of Supervisors acting as governing body of OCPW must adopt a Statement of Overriding Considerations in order to approve the proposed project.

2.3 BACKGROUND

2.3.1 NOTICE OF PREPARATION

As required by CEQA, an NOP for the proposed project was prepared by OCPW. The NOP was released on May 1, 2014, for a 30-day public review period which concluded on May 30, 2014. The NOP was distributed to the State Clearinghouse (SCH) Office of Planning and Research, public agencies, interested parties, and service providers. A copy of the NOP and the distribution list for the NOP are provided in Appendix A of this Draft EIR.

OCPW received 12 written responses to the NOP. Copies of these comment letters are provided in Appendix B of this Draft EIR. Table 2-2 summarizes the comment letters and indicates where in this Draft EIR each specific issue raised in these comment letters is located, to the extent that the comment raises an issue to be addressed in this Draft EIR in accordance with CEQA.

2.3.2 PUBLIC SCOPING AND CITIZEN CONCERNS

A public Scoping Meeting was held on May 10, 2014 from 10:00 AM to 1:00 PM at the Green River Golf Club (Tri-County Rooms) located at 5215 Green River Road, Corona, California, 92880. A brief summary of the purpose of the meeting and purpose of the proposed project was given by OCPW staff. OCPW staff provided information on how the public might provide comments on the content and focus of the Draft EIR. Written comments received during the Scoping Meeting and comments letters provided in this response to the NOP are addressed in the appropriate sections of this Draft EIR and are summarized in Table 2-2.

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
California Department of Fish and Wildlife (CDFW)	<p>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.</p> <p>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.</p>	Section 5.3 (Biological Resources).
CDFW	<p>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.</p> <p>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</p>	Section 5.3 (Biological Resources).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
<p align="center">CDFW</p>	<p>and Wildlife Service wetland definition adopted by the Department. 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.</p> <p>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 <i>et seq.</i> 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 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 <i>et seq.</i> 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.</p>	
<p align="center">CDFW</p>	<p>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, Sections 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, Sections 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</p>	<p>Section 5.3 (Biological Resources).</p>

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
CDFW	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.	
CDFW	<p>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.</p> <ul style="list-style-type: none"> 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. 	Section 3.0 (Project Description) and Section 6.0 (Alternatives to the Project).
CDFW	<p>To provide a complete assessment of 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[,] [t]he DEIR should include the following information.</p> <ul style="list-style-type: none"> 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 	Section 5.3 (Biological Resources).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
	<p>(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.</p> <p>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.</p> <p>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, Section 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.</p>	
<p>CDFW</p>	<p>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.</p> <p>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.</p>	<p>Section 5.3 (Biological Resources), Section 5.8 (Hydrology and Water Quality), Section 5.9 (Noise), and Section 8.0 (Cumulative Impacts).</p>

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
	<p>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.</p> <p>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.</p> <p>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.</p>	
<p align="center">CDFW</p>	<p>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.</p>	<p>Section 5.3 (Biological Resources).</p>
<p align="center">CDFW</p>	<p>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.</p>	<p>Section 5.3 (Biological Resources).</p>

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
CDFW	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, Section 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.	Section 5.3 (Biological Resources).
CDFW	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.	Comment noted.
CDFW	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.	Section 5.3 (Biological Resources).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
California Department of Transportation (Caltrans)	<p>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.</p> <p>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.</p>	Section 5.11 (Transportation and Traffic).
Department of Parks and Recreation (State Parks)	<p>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 [State Park].</p> <p>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.</p>	Comment noted. Section 5.3 (Biological Resources) and 6.0 (Alternatives to the Project).
State Parks	<p>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.</p> <p>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</p>	Comment noted. Section 5.3 (Biological Resources).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
	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.	
South Coast Air Quality Management District (SCAQMD)	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 analysis 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 (<u>not</u> 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 <u>will require</u> additional time for review beyond the end of the comment period.	Comment noted.
SCAQMD	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. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software.	Section 5.2 (Air Quality).
SCAQMD	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. Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.	Section 5.2 (Air Quality).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
SCAQMD	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. 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). LSTs 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.	Section 5.2 (Air Quality).
SCAQMD	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. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.	Section 5.2 (Air Quality).
SCAQMD	In the event that the proposed 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 Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.	Section 5.2 (Air Quality).
Orange County Fire Authority (OCFA)	OCFA requests 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.	Comment noted.
Orange County Sanitation District (OCSD)	The cooperative project between the County of Orange, [Santa Ana River Watershed Agency (SAWPA)], and the Orange County Sanitation District (OCSD) to relocate the [Santa Ana Regional Interceptor (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	Comment noted.

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
	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.	
City of Yorba Linda (E-mail dated May 30, 2014)	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.	Comment noted.
Wildlife Corridor Conservation Authority	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 Puente-Chino Hills contain biological resources of statewide and worldwide significance.	Comment noted. Section 5.3 (Biological Resources).
Wildlife Corridor Conservation Authority	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.	Comment noted. Section 5.3 (Biological Resources) and Section 5.8 (Hydrology and Water Quality).
Wildlife Corridor Conservation Authority	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.	Section 3.0 (Project Description), Section 5.3 (Biological Resources), and Section 5.10 (Recreation).
Wildlife Corridor Conservation Authority	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 converted (including how much will be converted to impervious surfaces) by the project. It should include maps showing existing wildlife movement areas on an 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 used during project construction and operation. In the EIR, avoidance of	Section 5.3 (Biological Resources).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
	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.	
Wildlife Corridor Conservation Authority	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).	Section 8.0 (Cumulative Impacts).
Eric Johnson (Sierra Club) (Public Comment Card)	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.	Comment noted. Section 5.3 (Biological Resources).
Frank Colver (E-mail dated May 23, 2014)	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 to 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.	Comment noted.
Peter Wetzel (E-mail dated May 20, 2014)	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.	Comment noted. Section 3.0 (Project Description) and Section 5.3 (Biological Resources).

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
<p>Peter Wetzel (E-mail dated May 20, 2014)</p>	<p>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.</p>	<p>Comment noted.</p>
<p>Tim Wood (E-mail dated May 2, 2014)</p>	<p>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.</p>	<p>Comment noted.</p>
<p>Tim Wood (E-mail dated May 2, 2014)</p>	<p>The current temporary bike path is less than desirable for a couple of reasons (with suggestions for the new pathway):</p> <ol style="list-style-type: none"> 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. 	<p>Comment noted. Section 5.3 (Biological Resources).</p>

**TABLE 2-2
SUMMARY OF WRITTEN COMMENTS IN RESPONSE TO THE NOP AND SCOPING MEETING**

Respondent	Summary of Comments	Where Comment is Addressed in EIR
	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.	
Tim Wood (E-mail dated May 2, 2014)	Not in the scope of this project, but worth noting nonetheless: 1) It would be an 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.)	Comment noted.

Source: AECOM (2015).