

COASTAL CONSERVANCY

Staff Recommendation  
February 13, 2025

**SANTA ANA RIVER TRAIL: ORANGE COUNTY PHASING PLAN**

Project No. 11-024-02  
Project Manager: Danh Lai

**RECOMMENDED ACTION:** Authorization to disburse up to \$250,000 to Orange County Parks to prepare a phasing plan for a two-mile segment of the Santa Ana River Trail located in Orange County at the border with Riverside and San Bernardino Counties, and to prepare final designs and obtain permits for a portion of the two-mile segment, and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Yorba Linda, Orange County

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EXHIBITS

- Exhibit 1: [Project Location Map](#)
  - Exhibit 2: [Project Photos](#)
  - Exhibit 3: [Project Letters](#)
  - Exhibit 4: [Santa Ana River Parkway Final Environmental Impact Report](#)
  - Exhibit 5: [Mitigation Monitoring and Reporting Program](#)
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**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed two hundred fifty thousand dollars (\$250,000) to Orange County Parks (OC Parks) (“the grantee”) to prepare a phasing plan for a two-mile segment of the Santa Ana River Trail located in Orange County at the border with Riverside and San Bernardino Counties, and preparing designs and a construction package, and obtaining permits for future construction of a portion of the two-mile segment. Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 4.6 of Division 21 of the Public Resources Code, regarding Santa Ana River Conservancy Program and funding for recreational opportunities and trails.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Conservancy has independently reviewed and considered the Santa Ana River Parkway Extension Project Final Environmental Impact Report (EIR) certified by the County of Orange on November 22, 2016, pursuant to the California Environmental Quality Act ("CEQA") and attached to the accompanying staff recommendation as Exhibit 4. The Conservancy has also reviewed the Mitigation Monitoring and Reporting Program adopted by Orange County Public Works on November 22, 2016, and attached to the accompanying recommendation as Exhibit 4. The Conservancy finds, as described further in the accompanying staff recommendation, that:
  - a. The Santa Ana River Parkway Extension Project ("Project") will have potentially significant environmental effects in the areas of Biological Resources, Air Quality, Cultural Resources, Geology and Soil, Hydrology and Water Quality. The Conservancy finds that the mitigation measures identified in EIR will avoid, reduce, or mitigate these possible significant environmental effects to less-than-significant levels and that these mitigation measures have been required or incorporated into the Project.
  - b. The Conservancy further finds that the Project will result in significant and unavoidable environmental effects in the areas of Air Quality, but environmental and other benefits of the Project as described in the accompanying staff recommendation outweigh or render acceptable these unavoidable adverse environmental effects to achieve the objectives of the Project.
  - c. The Conservancy adopts the Findings regarding Significant Effects and Statement of Overriding Considerations set forth in the accompanying staff recommendation.

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## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY:**

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed two hundred fifty thousand dollars (\$250,000) to Orange County Parks (OC Parks) to, 1) complete a phasing plan with corresponding cost estimates for a two-mile segment of the Santa Ana River (SAR) Trail located in Orange County where the trail connects to Riverside and San Bernadino

Counties, 2) prepare a construction package for the eastern-most portion of the two-mile segment (anticipated Phase I), and 3) secure environmental regulatory permits for Phase I. This project will complete planning necessary to construct a portion of the two-mile segment of the SAR Trail that will complete a gap in the trail in Orange County.

Since the 1950's, citizen groups have worked with leaders in the watershed to develop a 100-mile trail running adjacent to the SAR. Their goal is to create a lively SAR trail connecting playgrounds, schools, ball fields, commercial centers, golf courses, equestrian facilities, and neighborhoods to natural areas with a linear trail along the river corridor. The Conservancy has awarded more than \$40 million in grants to nonprofit organizations, public agencies, and tribes to work towards this goal. Completed segments of the SAR currently total approximately 79 miles. The proposed project brings this vision one step closer to completion.

A two-mile gap exists in the Orange County portion of the SAR Trail, preventing connection of the SAR Trail at the Orange, Riverside, and San Bernardino County boundary. Currently, the gap prevents the public from biking and hiking along the river through county lines. Establishing this critical connection will allow inland neighbors to access the coast along the SAR Trail while preserving open spaces along the way.

The proposed project allows OC Parks to continue progress on closing this gap by completing critical preconstruction activities. OC Parks will complete a phasing plan that will divide the endeavor into manageable construction stages. OC Parks will also complete design plans for the first phase of construction, which is expected to be the easternmost portion of the two-mile gap (anticipated Phase 1), which will include a 0.7-mile Class I bikeway and a parallel, 1.75-mile hiking and riding trail. Phase 1 might include amenities such as benches, bike racks, and interpretive signs informed by community input. The Phase 1 design planning will include engagement with residents through community meetings and a digital outreach campaign. OC Parks will prepare a construction package which will repackage existing plans and provide additional details and specifications that will bring Phase 1 to "shovel ready" status. Lastly, the grantee will also obtain the permits required to implement Phase 1.

**Site Description:** The project site is a 2-mile segment of the SAR Parkway at the intersection of Orange, Riverside, and San Bernardino County (Exhibit 2). It extends from Gypsum Canyon Road in Yorba Linda, Orange County to the Orange County/San Bernardino County boundary in unincorporated Orange County. The Orange County section of the SAR Trail will connect Riverside and San Bernardino counties to the Pacific Ocean with existing 28 miles of Class 1 bike lanes. The river habitat area of the project site provides habitat for several sensitive species such as the Santa Ana sucker, the coastal California gnatcatcher, and the least Bell's vireo.

**Grant Applicant Qualifications:** OC Parks has extensive experience reliably managing grants ranging from \$214,000 to \$9.7 million and it manages 60,000 acres of parks and recreational areas. OC Parks has successfully managed two grants from the Conservancy for the SAR, including the conceptual design of the proposed project site.

**CONSISTENCY WITH CONSERVANCY’S PROJECT SELECTION CRITERIA:**

The proposed project is consistent with the Conservancy’s Project Selection Criteria, last updated on September 23, 2021, in the following respects:

**Selection Criteria**

**1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the “Consistency with Conservancy’s Strategic Plan” section below.

**2. Project is a good investment of state resources.**

The project will ultimately benefit three counties brought together by the Santa Ana River: Orange, Riverside, and San Bernardino County. It will enhance the usability of the river, not only for flood management, but for non-motorized transportation and recreation.

**3. Project benefits will be sustainable or resilient over the project lifespan.**

OC Parks owns the property and will be responsible for the long-term maintenance following construction of the trail. Maintenance of all their parks countywide is already integrated into their routine. This involves regular inspections and assessments, which will prompt repairs and cleaning as needed. These will be conducted by OC Parks staff and supplemented by volunteers. OC Parks has also accounted for earthquakes and flooding in the project design, both of which are probable events in the area.

**4. Project delivers multiple benefits and significant positive impact.**

Increasing opportunities for recreation in natural spaces is critical in this highly developed urban region. This project will allow residents from car-dependent counties far from the coast to enjoy the river and coast, regardless of their access to a car. The Orange County Transportation Authority explicitly includes the Santa Ana River Trail as a solution to reduce traffic congestion on the heavily used State Route 91.

**5. Project planned with meaningful community engagement and broad community support.**

OC Parks will collaborate with San Bernardino and Riverside counties to host a “super” community event to update residents from all three counties about the plans and solicit public input, publicized through a social media campaign and postings on the OC Parks website. This project is a product of over a decade of planning and community engagement. In 2011, public workshops, stakeholder meetings, and presentations at private organization events were held to establish project goals and guide the design of the project. The public then had an opportunity to learn about the project at an open house where they were informed about the bikeway and adjacent hiking trails. OC Parks then collected 4,607 surveys as part of their 2018 Strategic Plan development and respondents highlighted “building new trails/bikeways” as one of their top priorities.

**PROJECT FINANCING**

**Coastal Conservancy**

**\$250,000**

**Project Total**

**\$250,000**

The anticipated source of Conservancy funding for this project is a fiscal year 2022-2023 appropriation to the Conservancy from the General Fund for the Santa Ana River Conservancy Program. This project is consistent with the goals of the Santa Ana River Conservancy Program, as discussed in the Consistency with Conservancy’s Enabling Legislation section below.

Unless specifically identified as “Required Match,” the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

The proposed project is consistent with the provisions of Chapter 4.6 of Division 21 of the Public Resources Code, Sections 31170 to 31174 regarding the Santa Ana River Conservancy Program and funding for recreational opportunities and trails within the Santa Ana River region. This project will complete the plan for phasing of construction for this portion of the Santa Ana River Trail.

The Conservancy is authorized to implement the Santa Ana River Conservancy Program within the Santa Ana River region, which includes lands within one-half mile on either side of the Santa Ana River or its tributaries. (Section 31172(c)). Consistent with this section, the proposed project is located along the Santa Ana River.

Section 31173 states that the Conservancy may undertake projects and award grants to public agencies to help achieve the goals of the Santa Ana River Conservancy Program, including recreational opportunities (Section 31173(a)). Santa Ana River Conservancy Program goals also include public access to, enjoyment of, and enhancement of recreational and educational experience on program lands in a manner consistent with the protection of land and natural resources and economic resources in the area (Section 31173(b)). This project will complete design and permitting for construction of a new portion of the Santa Ana River Trail, which will provide increased access to and enjoyment of recreational opportunities along the Santa Ana River once the trail is constructed.

Section 31174(b) requires the Conservancy to prepare the Santa Ana River Parkway and Open Space Plan (Plan), which was approved by the Conservancy in May 2018. The Plan is required to identify and prioritize low-impact recreational and open-space needs, including additional or upgraded facilities and parks that may be necessary or desirable within the Santa Ana River watershed. This project is identified as a priority project in the Plan that will assist in upgrading facilities and parks that are necessary or desirable within the Santa Ana River watershed.

Section 31174(c) states that the Conservancy shall “Give priority to river-related projects that create expanded opportunities for recreation, greening, aesthetic improvement, and wildlife habitat along the corridor of the river and in parts of the river channel that can be improved without infringing on water quality, water supply, and necessary flood control.” The proposed project will help achieve the goals of the Santa Ana River Conservancy Program by awarding a

grant to OC Parks to complete design for biking and hiking trails along the Santa Ana River. The extension of the trails for pedestrians and bicyclists will allow for intercounty travel and hiking.

**CONSISTENCY WITH CONSERVANCY'S [2023-2027 STRATEGIC PLAN](#):**

Consistent with **Goal 1.1 Benefit Systemically Excluded Communities**, the proposed project will benefit disadvantaged communities by planning for trail development for recreation and transportation along the river.

Consistent with **Goal 2.4 Build Trails**, the proposed project will plan improvements to trail accessibility and safety along the Santa Ana River.

Consistent with **Goal 2.5 Recreation Facilities and Amenities**, the proposed project will plan improvements to interpretive signage and trail amenities such as seating and lighting along the Santa Ana River.

**CEQA COMPLIANCE:**

On November 22, 2016, Orange County Public Works (OCPW) certified the Final Environmental Impact Report and Appendices for the Santa Ana River Parkway Extension Project (Final EIR) (Exhibit 3), approved the Santa Ana River Parkway Extension Project, and adopted a Mitigation Monitoring and Reporting Program ("MMRP"). The Final EIR addresses the two-mile segment of the SAR Trail that is the subject of the recommended grant and that for purposes of this CEQA discussion is referred to as the project (Exhibit 4). While OC Parks is the proposed grantee for this project, OCPW is the lead agency for CEQA purposes and will oversee construction and enforce mitigation measures. For the following resource areas, the Final EIR indicated that the project will have potentially significant environmental effects, however changes or alterations have been required in, or incorporated into, the project that mitigate to less than significant each of the potentially significant effects:

- **Biological Resources**
- **Air Quality**
- **Cultural Resources**
- **Geology and Soil**
- **Hydrology and Water Quality**

For the following resource areas, the Final EIR indicated that the project will have significant environmental effects that although minimized or reduced by mitigation measures will not be less than significant level, either because no mitigations measures are available or mitigation measures were considered but identified as infeasible due to specific economic, legal, social, technological, or other considerations:

- **Air Quality**

These impacts will remain significant and unavoidable. A Statement of Overriding Considerations (see below) is being adopted to address these significant and unmitigated impacts.

**Findings for Significant Effects that can be Mitigated to Less-Than-Significant Levels**

**Biological Resources**

The project area includes critical habitat for the Santa Ana sucker and coastal CA gnatcatcher as they both species inhabit the low flow channels of the river; however the report finds that the project construction will not result in significant changes to the overall habitat. Clarke's marsh wren, yellow warbler, yellow breasted chat, and Cooper's hawk potentially breed in the in-water(?) portions of the project area and active nests may be significantly impacted by the project construction. Least Bell's vireo nesting season occurs between March 15 to September 15.

The MMRP includes measures BR-1 that requires field surveys of the species listed above. BR-5 requires that a qualified biologist monitor during clearing, grubbing, and excavation activities to prevent trespassing onto sensitive habitat. The County will take steps to consolidate potential disruptive construction material away from sensitive areas with BR-2 and adhere to speed limits through BR-3. BR-4 establishes a litter control program entails a daily removal of trash receptacles and weekly disposal of the trash. BR-8 and BR-9 designate in and out routes, such as access roads, and physical barriers around buffer areas determined through BR-6 and BR-10 to minimize disturbance to sensitive plants and nesting habitat.

BR-7 requires that initial vegetation removal will be limited, to the extent feasible, outside of the nesting season. If these activities occur during the nesting season, a qualified biologist will survey the area and record all nests found. A nest must have a 100 feet buffer where it is flagged and avoided until the end of the nesting cycle or as the monitor sees fit. Exceptions will be considered when not protection zones are not feasible. OCPW must obtain a concurrence from the appropriate resource agency. Surveys in adjacent areas where construction continues to take place will continue once a week following the completion of the vegetation removal. OCPW will share this data with CDFW once a week.

BR-12 requires OCPW to restore the vegetation that was disturbed during work to at least a 1:1 ratio and prevent introducing exotic plants. If the site does not recover within 5 years, OCPW will replant the vegetation and compensate for any permanent impacts according to negotiation with the regulatory agency. They will provide a plant palette to the State Department of Parks and Recreation for review. Entrance and exit routes will be designated to minimize vegetation impact. The perimeter and limits of the project will be flagged or marked with temporary fencing (low fence with silt barriers). The project area is also subjected to regional compliance requirements. The Santa Ana River Canyon Habitat Management Plan requires that the project implements measures that mitigate impacts to sensitive riparian vegetation in accordance with the plan. Section 7 of ESA requires mitigation measure to protect endangered species and attain the applicable regulatory permits.

All of these measures will reduce impacts to the listed biological resources to less than significant.

### **Air Quality**

There will be potentially significant air quality impacts of the proposed project during construction associated with violation/contribution to an air quality standard and contribution to a cumulatively considerable net increase of criteria pollutants. These impacts were related to maximum daily construction emissions of nitrogen oxides (NOx). Measure AQ-1 requires off-road construction diesel engines not registered under ARB's Statewide Portable Equipment Registration Program that have a rating of 50 horsepower (hp) or more, shall meet, at a minimum, the Tier 3 California Emissions Standards, unless such an engine is not available for a particular item of equipment. Tier 2 engines will be allowed on a case-by-case basis when the contractor has documented that no Tier 3 equipment or emissions equivalent retrofit equipment is available for a particular equipment type that must be used to complete construction. Documentation shall consist of signed written statements from at least two construction equipment rental firms. The implementation of AQ-1 would reduce impacts of NOx to a less than significant level.

### **Cultural Resources**

The project may have potentially significant impacts to cultural resources in the project area due to ground disturbing activities. Construction may result in encountering paleontological and archeological resources including human remains. The following measures will reduce impacts to less than significant:

C-1 and C-3 requires that a County-selected paleontological monitor and archeological monitor will be present during ground disturbing activities with depths greater than 5 feet and has the authority to redirect construction equipment if potential paleontological resources are encountered. Work in the vicinity will halt until appropriate treatment of any found resource is determined by either a qualified paleontologist or trained Native American resources in accordance with the provisions of CEQA Guidelines Section 15064.5. Native American monitoring (C-3) shall occur on an as-needed basis and shall be intended to ensure that Native American concerns are taken into account during the construction process.

C-2 and C-4 requires that prior to the commencement of any ground disturbing activities, both a qualified paleontological and archeological consultant shall conduct training for construction personnel and supervisory staff on possible paleontological and archeological resources that may be present in the area to establish an understanding of what to look for during ground-disturbing activities.

C-5 requires that if human remains are discovered, work in the immediate vicinity of the discovery shall be suspended and the County Coroner shall be contacted. If the remains are deemed Native American in origin, the County Coroner shall contact the Native American Heritage Commission and identify a Most Likely Descendant pursuant to Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5. Work may continue other parts of the project while consultation and treatment are conducted. Any archaeological materials recovered shall be prepared for and curated at an approved facility.

### **Geology and Soils**



Implementation of the project will have potentially-significant seismic related impacts such as seismic shaking, seismic related ground failure, seismically-induced settlement, liquefaction, lateral spreading, and expansive soils. Measure G-1 requires that design level geotechnical investigation conducted by a Certified Engineering Geologist or Licensed Geotechnical Engineer in order to attain a grading permit as well as assess detailed seismic, geologic, and soil conditions. The geotechnical investigation shall include a seismic evaluation of potential maximum ground motion at the site, an evaluation of liquefaction potential, slope stability, expansive and compressible soils, and other structural characteristics and shall conform to the County Grading Manual. The resulting recommendations will be incorporated into the design and reduce impacts to less than significant.

### **Hydrology and Water Quality**

The introduction of equestrian activities on the trails poses potential negative impacts to water quality due to increased nitrates and bacteria in surface water run off. BR-13 will implement an ongoing County-approved operation and management program that contains best management practices for equestrian use and identifies items to specify maintenance levels and frequency, funding resources, and work responsibility. This measure is complemented by adherence to CGP and Orange County MS4 Permit will reduce impacts to levels less than significant.

### **Findings for Potentially Significant and Unavoidable Effects**

#### **Air Quality**

Emissions from construction and necessary vehicles would exceed the South Coast Air Quality Management District (SCAQMD)'s localized significant thresholds for respirable particulate matter with a diameter of 10 micrometers or less (PM10) and the fine particulate matter with a diameter of 2.5 micrometers or less (PM2.5). Despite complying with SCAQMD Rule 403 that requires measures such as applying water to prevent generation of dust, cleaning vehicles and wheels, and re-establishing ground cover, the project would still violate ambient air quality standards and the impacts would be significant and unavoidable. There are no additional measures to reduce impacts, but the many benefits of the project balance the risks as described in the Statement of Overriding Considerations.

#### **Statement of Overriding Considerations**

In the event a project has unavoidable significant environmental effects, the CEQA Guidelines require the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project (Title 14 California Code of Regulations Section 15093). If the specific project benefits outweigh the unavoidable significant environmental effects of the project, a Statement of Overriding Considerations may be adopted and the project approved, despite its significant environmental effects. The overall environmental benefits of the Project, as detailed in Project Summary section of this staff recommendation, warrant the Conservancy's decision

to approve the Project. The Project's public benefits that justify proceeding with the Project despite the environmental cost of the unavoidable significant environmental effects include:

- Closing a critical 2-mile gap between Gypsum Canyon Road and the Orange County border in the SAR Riding and Hiking Trail for the purpose of extending and completing the Orange County portion of the SAR Parkway system;
- Enhancing the Orange County SAR Parkway (e.g., by providing staging, trailheads, crossroads/intersections, and other amenities) to provide an enjoyable bikeway, riding and hiking experience, and will facilitate connection to adjacent existing and future recreational trails, such as connections with planned improvements in Riverside and San Bernardino Counties, as well as enhance the SAR Parkway as a passive recreational destination;
- Minimizing intrusion into the Green River Golf Club, Featherly Regional Park/Canyon RV Park, and Chino Hills State Park;
- Establishing a maintainable bikeway and trail system that will maximize bikeway and trail user safety; and
- Further supporting and promoting non-motorized commuter and recreational use, as it provides bicycle, pedestrian, and equestrian facilities, which will ultimately result in the completion of the 110-mile SAR trail for walkers, joggers, runners, hikers, bicyclists, and equestrians. The promotion of non-motorized use has the potential to reduce automotive emissions.

For these reasons, Conservancy staff recommends that the Conservancy find that the project, as mitigated, avoids or reduces to less than significant all potentially significant environmental effects, except for the unavoidable significant environmental effects to air quality. With respect to these unavoidable significant environmental effects, Conservancy staff recommends that the Conservancy find that the economic, legal, social, technological, and other benefits of the project outweigh the unavoidable significant environmental effects, thereby warranting its approval.

Upon approval of the project, Conservancy staff will file a Notice of Determination.