

COASTAL CONSERVANCY

Staff Recommendation
January 29, 2015

**SANTA ANA RIVER PARKWAY TRAIL:
SAN BERNARDINO COUNTY CONSTRUCTION – REACH III**

Project No. 13-015-02
Project Manager: Greg Gauthier

RECOMMENDED ACTION: Authorization to disburse up to \$3,399,500 to the County of San Bernardino to construct a 3.8-mile segment of the Santa Ana River Parkway Trail in San Bernardino County.

LOCATION: From Waterman Avenue, City of San Bernardino, to California Street, City of Redlands, San Bernardino County (Exhibit 1)

PROGRAM CATEGORY: Public Access

EXHIBITS

- Exhibit 1: [1.1: Project Location Map for entire Santa Ana River Parkway Trail](#)
[1.2: Project Location Map for this authorization](#)
[1.3: Trail Segment Map](#)
- Exhibit 2: [Coastal Conservancy Staff Recommendation No.07-097, “Santa Ana River Parkway” \(December 13, 2007\)](#)
- Exhibit 3: [Project Letters](#)
- Exhibit 4: [Initial Study and Mitigated Negative Declaration for the “Santa Ana River Trail Phase III Project”](#)
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RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31400 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes disbursement of up to three million three hundred ninety-nine thousand five hundred dollars (\$3,399,500) to the County of San Bernardino (County) to construct a 3.8-mile segment of the Santa Ana River Parkway Trail corridor from Waterman Avenue, City of San Bernardino, to California Street, City of Redlands, in the County of San Bernardino.

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This authorization is subject to the following conditions:

1. Prior to disbursement of funds, the Conservancy’s Executive Officer shall review and approve in writing the County’s final work program, including a budget and schedule, and any contractors the County proposes to employ for the project.
2. The County shall ensure installation of signs identifying the trail segments and acknowledging the Conservancy’s funding and displaying its logo in a manner approved by the Conservancy’s Executive Officer.
3. In carrying out the project, the County shall implement all project actions, components and mitigation measures identified to avoid, reduce, or mitigate significant environment effects in the Mitigated Negative Declaration for the “Santa Ana River Trail Phase III Project,” attached to the accompanying staff recommendation as Exhibit 4.”

Staff further recommends that the Conservancy adopt the following findings:

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

1. The proposed authorization is consistent with the purposes and objectives of Chapter 9 of Division 21 of the Public Resources Code, regarding the establishment of a system of public accessways to and along the California coast.
2. The proposed project will serve greater-than-local needs.
3. The proposed project is consistent with the current Project Selection Criteria and Guidelines.
4. The Conservancy has independently reviewed the Mitigated Negative Declaration for the “Santa Ana River Trail Phase III Project,” and finds no substantial evidence that the project as proposed, and with the identified measures to avoid, reduce or mitigate the possible significant environmental effects, will have a significant effect on the environment.”

PROJECT SUMMARY:

Staff recommends that the Conservancy authorize disbursement of funds to the County of San Bernardino (the County) to construct a 3.8-mile segment of the Santa Ana River Parkway Trail corridor from Waterman Avenue to California Street, City of Redlands, all within the County of San Bernardino. See Exhibit 1. This trail segment will consist of a paved Class I bikeway—a shared use path that is physically separated from any street or highway and may be used by pedestrians, skaters, wheelchair users, and other non-motorized users—with adjacent soft-surface pedestrian/equestrian shoulders.

The Santa Ana River Parkway will connect the Inland Empire from the crest of the San Bernardino Mountains to the Pacific Ocean near Huntington Beach. See Exhibit 1. The parkway concept is that of a linear park that is centered by Class I bikeway (paved) and hiking and riding (soft-surface) trails, and includes a series of parks connected by the trails. The approximately 88 miles from the coast to the San Bernardino Mountains will consist of a “dual track” of paved and soft-surface trails, and then an additional 12 miles of soft-surface trails will run within the San Bernardino Mountains. When completed, the parkway will include an approximately 100-mile

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continuous multi-use trail system that connects three counties, Orange, Riverside, and San Bernardino, and multiple cities.

This proposed 3.8-mile segment will consist of:

- A 10-foot-wide hard-surface (combination of asphalt, concrete, and/or decomposed granite) trail with adjacent two-foot-wide unpaved (native soil) shoulders on each side. Protective side screens/railings will be installed where the trail crosses under roads.
- Five trail access ramps from surface streets.
- A prefabricated clear-span steel bridge over Mission-Zanja Creek (approximately 100 feet long and 14 feet wide).
- A temporary bike lane that uses existing crossings to accommodate bicyclists until permits to install the bridge over Mission-Zanja Creek can be obtained. Construction of this temporary lane will include pavement striping/markings, installation of signs, and placement of asphalt/concrete path across an existing abandoned railroad track.

The trail will be constructed on the south side of the Santa Ana River corridor. The majority of this trail segment will be constructed along either an existing County Flood Control levee or on an existing levee maintenance road. In the area of the confluence of Mission-Zanja Creek and the Santa Ana River where no levee exists (just east of Waterman Avenue to Orange Show Road), the trail will be constructed on the unimproved southern bank of the riverbed within County Flood Control right-of-way. The trail will comply with the Americans with Disabilities Act (ADA) of 1990, as amended.

Construction activities will include grading and fill; installation of access ramps, and ramps under road crossings (and any necessary associated embankment/retaining walls); fencing and railing, trail delineators, and pavement striping/markings; access gates and signage; culverts and storm drain facilities; and erosion-control and stormwater pollution prevention measures (standard construction Best Management Practices).

Construction is anticipated to be completed approximately nine months from the construction start date, including an approximately six-month window for obtaining permits for installing the bridge. Monitoring and mitigation will be completed by March 2016.

The proposed project will be jointly managed by the San Bernardino County Departments of Public Works and Regional Parks. The Regional Parks Department operates and maintains nine regional parks, a wildlife preserve, and over 18 miles of recreational trails. The County was the Conservancy's previous grantee for Santa Ana River Parkway Trail planning and design work.

Site Description: The vicinity of the proposed trail is a relatively open area where the Santa Ana River channel widens to several hundred feet and the adjacent levee on which the trail will be located is up to 50 feet wide. Adjacent land uses along the southerly boundary include (proceeding easterly of Waterman Avenue to California Street): a hotel, commercial/offices, vacant land, industrial uses, including self-storage and a Southern California Edison power plant. North of the levee is the Santa Ana River. Land uses on the north side of the River consist of commercial roofing and lumber yards, the BNSF Railroad (until it crosses the River), and the San Bernardino International Airport (formerly Norton Air Force Base) and vacant land.

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Project History: On December 13, 2007, the Conservancy authorized funds to Orange, Riverside, and San Bernardino counties to conduct planning, design, engineering, and environmental review for various segments along the Santa Ana River Parkway Trail corridor (See Exhibit 2). The Conservancy-funded portion of the San Bernardino segment extended from Waterman Avenue east to California Street (the segment the County refers to as “Phase III” and this staff recommendation refers to as “Reach III”¹) and subsequently from California Street to Alabama Street (“Phase/Reach IV”). The County conducted design and engineering for Reach III using other funds, and seeks funds for construction via this authorization. Additional history can be found in the “Project History” section of Exhibit 2.

PROJECT FINANCING

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| Coastal Conservancy | \$3,399,500 |
| Project Total | \$3,399,500 |

Forty-five million dollars is allocated to the Conservancy in Proposition 84 for projects to “expand and improve” the Santa Ana River Parkway. These projects must be developed “in consultation with local government agencies participating in the development of the Santa Ana River Parkway.” Proposition 84 further specifies that at least \$10 million of these funds should be spent in each of the three counties, specifically San Bernardino, Orange and Riverside Counties.

Consistent with the funding source, the recommended action is to provide funds to construct a segment of the Santa Ana River Parkway Trail located in San Bernardino County. The proposed project was developed in partnership with the local governments, particularly the San Bernardino County Public Works and Regional Parks Departments and the Cities of Colton, San Bernardino, Highland, and Redlands.

Although there are no matching funds for the construction phase of Reach III, the County secured over \$1.9 million from other funding sources to complete environmental review, design, and engineering. These sources included the County, the Federal Highway Administration/Caltrans, the Wildlands Conservancy, and Southern California Edison.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project would be undertaken pursuant to Chapter 9 of the Public Resources Code Sections 31400 *et seq.*, regarding public access.

Section 31400 states the Legislature’s intent for the Conservancy to have a principal role in the implementation of a system of public accessways to the state’s coastline, and Section 31400.1 states that the Conservancy may award grants to a public agency to develop lands for public access to the coast that will serve greater-than-local needs. Consistent with these sections, the

¹ Note on terminology: Because Conservancy staff have used the term “phasing” to refer to progressive steps (e.g., “planning,” “engineering/design,” “construction”) this report refers to the County’s geographic “phases” as “reaches.”

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proposed authorization will enable the Conservancy to award funds to the County of San Bernardino, a public agency, to construct a segment of the Santa Ana River Parkway Trail, a regional river parkway that will link the San Bernardino Mountains to the Pacific Ocean, serving greater than local needs. When complete, this trail will be one of the longest urban recreation river parkways in the United States. Just under one-fifth of all the people in the state (approximately seven million people) live in the three counties served by this trail.

Section 31409 states that the Conservancy may award grants to public agencies to establish and expand inland trail systems that may be linked to the California Coastal Trail. Consistent with this section, the proposed authorization will enable the Conservancy to award funds to the County of San Bernardino, a public agency, to construct a segment of the Santa Ana River Parkway Trail, a regional river parkway that will link the San Bernardino Mountains to the Pacific Ocean and to the California Coastal Trail.

CONSISTENCY WITH CONSERVANCY ACCESS PROGRAM STANDARDS:

As required by Public Resources Code Section 31401, the proposed access facilities to be developed under this project, are consistent with the Conservancy’s “Standards and Recommendations for Accessway Location And Development”, as follows:

Standard No. 4: *Privacy*

Consistent with this standard, all trails, parking lots, observation points and other facilities would be located in a manner that protects the privacy of adjoining residences.

Standard No. 8: *Trails*

Consistent with this standard, the SART includes a continuous trail along the river, and connects with vertical trails that connect to parking areas and to scenic overlooks.

Standard No. 10: *Coastal Bikeways*

The SART will be a Class 1 separated bikeway for most of its length.

Standard No. 12: *Support Facilities*

Adequate support facilities are planned along every segment of the SART, including parking lots, bike racks, restrooms and picnic areas.

Standard No. 13: *Barrier-Free Access*

The SART is designed to comply with applicable laws regarding barrier free access for persons with disabilities.

**CONSISTENCY WITH CONSERVANCY’S 2013
STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 2, Objective F** of the Conservancy’s 2013-2018 Strategic Plan, the proposed project will construct a new segment of the Santa Ana River Parkway Trail, a regional river parkway that will connect inland populations to the coast.

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

The proposed project is consistent with the Conservancy’s Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

1. **Promotion of the Conservancy’s statutory programs and purposes:** See the “Consistency with Conservancy’s Enabling Legislation” section above.
2. **Consistency with purposes of the funding source:** See the “Project Financing” section above.
3. **Promotion and implementation of state plans and policies:** The proposed project promotes implementation of the following state plans and policies:
 - *California @ 50 Million: The Environmental Goals and Policy Report* (Governor’s Office of Planning and Research, Draft 2013): Goal 2, “Build Sustainable Regions that Support Healthy, Livable Communities,” specific strategy to “support and invest in active transportation projects, such as walking and biking infrastructure.”
 - *California Recreational Trails Plan* (California State Parks, Phase I, June 2002): The Santa Ana River Trail corridor was selected for inclusion in the plan as a California Trail Corridor that will “promote people’s desires to walk, ride a bicycle, use a wheelchair, or ride a horse through scenic areas of the state.”
4. **Support of the public:** The Santa Ana River Parkway Trail and this recommended authorization is widely supported by local organizations and elected officials; California State Parks; the Counties of Orange, Riverside, and San Bernardino; the Wildlands Conservancy; the Santa Ana Watershed Project Authority; the Flood Control Districts of Orange, Riverside, and San Bernardino Counties; the Cities of Colton, San Bernardino, Highland, and Redlands; the Redlands Water Bottle Transit Company; the Inland Empire Bicycle Alliance; and others. See letters of support in Exhibit 3.
5. **Location:** The proposed project is located along the Santa Ana River, and will help create a river parkway connecting inland communities from the San Bernardino Mountains to the Pacific Ocean.
6. **Need:** The Santa Ana River Trail and Parkway has been envisioned since 1955, but progress has been slow due to resource constraints. Although the County has raised significant matching funds, it does not currently have all the funding necessary to move forward with

constructing this portion of the trail absent Conservancy funds. Proposition 84 funds allocated to the Conservancy for the purpose of the trail and parkway are a necessary component to timely construction of the entire trail spine.

7. **Greater-than-local interest:** The Santa Ana River Parkway Trail will run approximately 100 miles and will link the San Bernardino Mountains to the Pacific Ocean. When complete, it will be one of the longest urban recreation river parkways in the United States. Just under one-fifth of all the people in the state (approximately seven million people) live in the three counties served by this trail. Portions of the trail received National Recreation Trail status in November 1976, and the National Park Service has indicated its interest in designating the entire trail as a National Recreation Trail once completed.
8. **Sea level rise vulnerability:** The proposed project is located in the Inland Empire—specifically, in the City of Redlands, County of San Bernardino, which is approximately 1,350 feet above sea level and therefore not vulnerable to future sea level rise.

Additional Criteria

9. **Leverage:** See the “Project Financing” section above.
10. **Readiness:** The County of San Bernardino is poised to begin project activities as soon as funds are authorized.
11. **Realization of prior Conservancy goals:** See “Project History” section, above.
12. **Cooperation:** In July 2006, Orange, Riverside, and San Bernardino Counties, the Santa Ana Watershed Project Authority, and the nonprofit Wildlands Conservancy adopted a Memorandum of Understanding to create a regional partnership and formal mechanism to complete the Santa Ana River Parkway Trail. There are two main groups to guide trail development: A policy advisory group consisting largely of elected officials, and a Technical Advisory Committee consisting largely of agency staff. This is a unique and successful model of regional coordination and collaboration.
13. **Minimization of greenhouse gas emissions:** Project construction is estimated to generate 8,401 metric tons of “carbon dioxide equivalent” emissions, an amount well below the screening level threshold and thus considered less-than-significant.² In addition, all work will be conducted consistent with the County’s 2011 Greenhouse Gas Emissions Reduction Plan,³ which contains strategies for use of diesel-fueled vehicles and equipment.

² Greenhouse gas emissions were analyzed as part of project review under the California Environmental Quality Act. Emissions estimates were calculated based on 155 work days using the California Emissions Estimator Model (CalEEMo, developed in collaboration with the California Air Quality Management Districts; <http://www.caleemod.com/>). The measure is presented in terms of “carbon dioxide equivalent,” CO₂(e), a metric measure used to compare emissions from various greenhouse gases based upon their global warming potential). When amortized annually over a 30-year lifetime (per South Coast Air Quality Management District emissions policy for construction activities), the annual level of 280 metric tons of CO₂(e) was well below the 3,000 metric ton screening level threshold.

³ <http://www.sbcounty.gov/Uploads/lus/GreenhouseGas/FinalGHG.pdf>

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COMPLIANCE WITH CEQA:

Conservancy staff has independently reviewed the Initial Study and Mitigated Negative Declaration (IS/MND) prepared by the County of San Bernardino Department of Public Works Department (lead agency under the California Environmental Quality Act (CEQA)) for the “Santa Ana River Trail Phase III” project and adopted on December 16, 2014. See Exhibit 4.

The County received one substantive comment letter, from the California Department of Fish and Wildlife (CDFW), during the public review period (which ran from May 5 to June 3, 2014). In its response, the County underscored its commitment to obtain all necessary permits and agreements (e.g., an Incidental Take Permit under the California Endangered Species Act, a notification of Lake and Streambed Alteration pursuant to Section 1602 of the California Fish and Game Code), reaffirmed that all potential project impacts on listed species were clearly identified and analyzed in the IS, and agreed to incorporate an additional mitigation measure (No. 4.4-15 in the table below) into the IS/MND and Mitigation Monitoring and Reporting Program (MMRP).

All mitigation measures identified in the IS/MND will be implemented through a MMRP, in compliance with Section 15097 of the *CEQA Guidelines*. Potential impacts and mitigation measures that will be imposed to lessen those impacts to a level of insignificance are summarized below.

| Air Quality | |
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| 4.3-1 | <p>Prior to issuance of grading permits, a Dust Control Plan shall be submitted to the County that demonstrates how construction activities would comply with the following dust control measures:</p> <ul style="list-style-type: none"> • Apply soil stabilizers or moisten inactive areas. • Prepare a high wind dust control plan. • Address previously disturbed areas if subsequent construction is delayed. • Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 3 times/day). • Cover all stock piles with tarps at the end of each day or as needed. • Provide water spray during loading and unloading of earthen materials. • Minimize in-out traffic from construction zone. |
| Biological Resources | |
| San Bernardino County Kangaroo Rat (SBKR) Critical Habitat [<i>Federal-Endangered</i>] | |
| 4.4-1 | <p>A qualified biologist shall provide an environmental awareness class to all persons who will work on-site during construction. The class will consist of a presentation about the biology of the surrounding area and any natural resource laws pertaining to the project. A fact sheet containing this information shall also be prepared and distributed. Upon completion of the class, the attendees will sign a form stating that they understand all protection measures. These forms will be filed with the County and will be made available to the regulatory resource agencies upon request.</p> |
| 4.4-2 | <p>Although, all project-related impacts to SBKR critical habitat will occur in low quality and unsuitable habitat, devoid of physical and biological features that are essential to the conservation of the species, losses of critical habitat must be fully accounted for to</p> |

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| | <p>ensure that adequate amounts of suitable habitat remain available for the long-term survival of the affected species.</p> <p>The County shall provide compensatory mitigation for project-related permanent impacts in a 2:1 mitigation ratio by rehabilitating approximately 0.2 acre of degraded habitat located adjacent the north and south sides of trail alignment between Tippecanoe Avenue and California Street. The rehabilitated habitat shall be protected in perpetuity through an approved Conservations Easement (CE) mechanism that allows the County of San Bernardino Flood Control District to maintain access and operations and maintenance activities. The CE will be managed by an approved County District. To cover the cost of maintaining the rehabilitated CE lands, the County of San Bernardino Regional Parks Department will coordinate with County Counsel to set up a non-wasting endowment fund.</p> <p>For temporary construction-related impacts to SBKR critical habitat, the County of San Bernardino Regional Parks Department will restore the habitat to its pre-project native condition, through the development and implementation of a Habitat Mitigation, Monitoring, & Reporting Plan (HMMRP) per US Army Corps (ACOE), US Fish and Wildlife Service (USFWS), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) requirements and standards.</p> |
| 4.4-3 | Under the supervision of a biologist, bright orange plastic construction fencing, stakes, flags, or markers that are clearly visible to construction personnel on foot and in heavy equipment will be used to delimit areas of grading, staging, and avoidance for the proposed project. These markers will be in place prior to project initiation (that includes any clearing, grubbing, grading, or staging of equipment or vehicles) and will remain in place until all construction activities are finished. Intrusion by construction personnel into adjacent land, outside of the delineated construction envelope, will not be permitted. All construction personnel and equipment will operate only within the clearly delineated limits of grading and construction activities. |
| 4.4-4 | Unauthorized, public off-road use of the project area shall be discouraged by posting of signs and by monitoring by the construction crew. |
| 4.4-5 | Existing routes of travel and approved access roads will be used to and from construction areas. Cross-country travel by vehicles and equipment will be prohibited. |
| 4.4-6 | Trash from construction personnel, especially food items or packaging, will be disposed of in covered containers and removed daily. |
| 4.4-7 | Avoid the creation of berms, which may attract SBKR, to minimize potential future impacts to SBKR during maintenance activities. |
| 4.4-8 | A qualified biologist will perform a visual pre-construction survey for SBKR within the construction footprint immediately prior to ground disturbing activities. Any small mammal burrows within the construction zone that cannot be avoided will be excavated by hand during the visual survey. This will allow the occupant, if any, to run out of harm's way. |
| 4.4-9 | The biologist will inspect the sites periodically and will remain on-call for the duration of the project. The biologist will oversee the implementation of minimization and/or avoidance measures during project set up and construction. |
| 4.4-10 | During construction, if a situation is encountered that could affect a listed species (i.e., SBKR) for which a contingency plan of avoidance, removal, relocation or transplant |

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| | has not been approved by the USFWS, then all activities will cease and the biologist will be notified. The biologist will then contact the appropriate regulatory authority within 24 hours. The biologist will have the authority to stop immediately any activity that is not in compliance with the natural resource regulatory laws or permits secured for the projects. She/he will have the authority to order any reasonable measure to avoid the take of SBKR. |
| 4.4-11 | If, in any event, SBKR is injured as a result of project-related activities during construction, construction will be halted, the USFWS will be notified and the injured animal will be taken to an approved veterinarian clinic. Construction activities will remain halted until the authority to resume is provided by the County in coordination with USFWS. |
| Southwestern Willow Flycatcher (SWWF) Critical Habitat [<i>Federal-Endangered</i>] | |
| 4.4-12 | Construction shall not occur between April 15 and September 1 which is the timeframe when SWWF migrate into the area, establish territories and potentially breed. |
| Least Bells Vireo (LBVI) [<i>Federal-Endangered</i>] | |
| 4.4-13 | Construction shall not occur between April 15 and September 1 which is the timeframe when LBVI migrate into the area, establish territories and potentially breed. |
| Vegetation within CDFW and RWQCB Jurisdiction | |
| Portions of the proposed trail segment will fall under the jurisdiction of the ACOE, the RWQCB, and/or the CDFW: | |
| <ul style="list-style-type: none"> • Areas of emergent, riparian vegetation under the Waterman Avenue bridge, parallel to the Santa Ana River just east of Mission-Zanja Creek and the Metrolink Bridge, and just east of the Tippecanoe Avenue bridge (where the existing flood control levee road crosses a culvert). • Unvegetated portions of the Santa Ana River under the Orange Show Road and Tippecanoe Avenue bridges. | |
| 4.4-14 | Prior to discharge of fill or streambed alteration of jurisdictional areas, the County shall obtain regulatory permits from the ACOE, RWQCB, and the CDFW. Mitigation can be provided by purchasing into any authorized mitigation bank; by selecting a site of comparable acreage near the site and enhancing it with a native riparian habitat or invasive species removal in accordance with a habitat mitigation plan approved by regulatory agencies; or by acquiring sufficient compensating habitat to meet regulatory agency requirements. Typically, regulatory agencies require mitigation for jurisdictional waters without any riparian or wetland habitat to be mitigated at a 1:1 ratio. For loss of any riparian or other wetland areas or habitat that supports listed species, the mitigation ratio shall be at a 2:1 ratio. A revegetation plan using native riparian vegetation common to the project area where riparian or wetland habitat will be affected shall be prepared and reviewed and approved by the appropriate regulatory agencies. The regulatory agencies can impose greater mitigation requirements in their permits, but County Regional Parks will utilize the ratios outlined above as the minimum required to offset or compensate for impacts to jurisdictional waters, riparian areas or other wetlands. |
| Potential for introduction of invasive species | |
| Via comments submitted during the public comment period, the CDFW recommended that the County implement an invasive species plan that prevents the introduction, transfer, and spread of | |

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| invasive species, including plants, animals, and microbes. | |
| 4.4-15 | Prior to delivery of all construction equipment to the project site, all construction equipment shall be washed and sterilized at a designated location outside of the project area. The contractor shall provide documentation to the County that the mobile equipment delivered to the site to support all trail construction activities has been washed and sterilized prior to delivery to the project site. Six months and 12 months following completion of construction, the County will inspect all areas disturbed on the levee and channel walls for invasive species, and shall arrange for a contractor or County employees to treat or remove any invasive plant species found within the disturbed areas. |
| Cultural Resources | |
| 4.5-1 | <p>The following procedures shall be followed if unique archaeological resources are discovered during ground-disturbance activities. Unique archaeological resources are defined, for this condition, as being multiple artifacts in close association with each other, but may include fewer artifacts if the area of the find is determined to be of significance due to its sacred or cultural importance.</p> <ol style="list-style-type: none"> 1. All ground disturbance activities within 100 feet of the discovered archaeological resource shall be halted until a meeting is convened between the County and a qualified archaeologist to discuss the significance of the find. 2. The archaeologist shall recommend appropriate actions, in cooperation with the County and Contractor. 3. Grading or further ground disturbance shall not resume within the area of the discovery until a determination has been reached by the County as to the appropriate mitigation. |
| 4.5-2 | A trained paleontological monitor shall be present during individual project excavation activities greater than 5.0 feet in depth. Excavations below 5.0 feet have a high likelihood of encountering older alluvial wash deposits, which may contain paleontological resources. The monitoring for paleontological resources shall be conducted on a half-time basis and on a full-time basis during excavation greater than 5.0 feet in depth. If paleontological resources are located during excavation, the monitoring program would change to full-time. The monitor shall be empowered to temporarily halt or redirect construction activities to ensure avoidance of adverse impacts to paleontological resources. The monitor shall be equipped to rapidly remove any large fossil specimens encountered during excavation. During monitoring, samples shall be collected and processed to recover micro-vertebrate fossils. Processing shall include wet-screen washing and microscopic examination of the residual materials to identify small vertebrate remains. |
| Geology and Soils | |
| 4.6-1 | The County (or its construction contractor) shall prepare a Storm Water Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP), and implement Best Management Practices (BMPs) to minimize erosion, siltation and overall water quality during construction and over the long-term operation of the subject trail segment. |
| Hydrology and Water Quality | |
| 4.9-1 | The County (or its construction contractor) shall prepare a SWPPP using BMPs from |

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| | Table 6 of the IS/MND or equivalent measures that will be effectively implemented to achieve the following performance standards: Prevent construction pollutants from making contact with storm water and with the intent of keeping all products of erosion from moving off-site into receiving waters; and eliminate or reduce non-stormwater discharges to MS4s and other waters. The BMPs shall be in place prior to ground disturbance and shall be maintained to achieve the performance standards. |
| 4.9-2 | The County (or its construction contractor) shall prepare a WQMP using BMPs from Tables 8 and 9 of the IS/MND or equivalent measures that will be effectively implemented to achieve the following performance standards: Minimize long-term runoff volumes that can reach the Santa Ana River; prevent pollutants from making contact with storm water and with the intent of keeping all products of erosion from moving off-site into receiving waters; and capture runoff adjacent to the trail or provide manufactured treatment units to treat the runoff before release into the Santa Ana River. The BMPs shall be in place prior to authorizing use of the trail disturbance and shall be maintained to achieve the performance standards. |
| 4.9-3 | The County (or its construction contractor) shall use recycled water to support construction of the subject segment of Santa Ana River Trail facilities. This shall be made a part of the construction contract issued by the County. |

Conservancy staff has independently reviewed the Initial Study and Mitigated Negative Declaration and concurs with the County’s determination that the proposed project does not have the potential for any significant environmental impacts. Staff recommends that the Conservancy find that there is no substantial evidence that the project as mitigated may have a significant effect on the environment. Staff will file a Notice of Determination upon the Conservancy’s approval of the project.