



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
www.wildlife.ca.gov

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



April 16, 2019

Mr. Justin Gollhofer, PE  
Orange County Public Works  
300 North Flower Street  
Santa Ana, CA 92703  
Justin.gollhofer@ocpw.ocgov.com

Governor's Office of Planning & Research  
APR 16 2019  
STATE CLEARINGHOUSE

**Subject: Comments on the Notice of Intent to Adopt a Mitigated Negative Declaration for the East Garden Grove-Wintersburg Channel, Warner to 1,250 FT Downstream of Goldenwest Street Sheet Pile Project, Huntington Beach, SCH# 2019039089**

Dear Mr. Gollhofer:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced East Garden Grove-Wintersburg Channel, Warner to 1,250 FT Downstream of Goldenwest Street Sheet Pile Project Mitigated Negative Declaration (MND; proposed project), dated March 2019. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA], Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning program (NCCP). The County of Orange (County) is signatory to the Implementing Agreement of the Central/Coastal Orange County NCCP/Habitat Conservation Plan.

The project, located in the East Garden Grove Wintersburg Channel (C05), between Warner Avenue and 1,250 feet downstream Goldenwest Street, will convert the 2:1-sloped earthen soft-bottomed channel into a concrete box channel in order to increase flow and conveyance. This will be achieved through the installation of soil-mix columns sandwiched between two parallel sheet pile walls. Once construction of the sheet pile walls is completed, the existing earthen side slopes of both levees will be excavated back to the sheet pile walls to provide for the 100-year storm water conveyance capacity within this reach of the channel. A temporary coffer dam will be required to block in-channel water flow so that soil can be removed.

Approximately 11.5 miles long, C05 begins in Garden Grove and discharges into Bolsa Chica Ecological Reserve (BCER) at Outer Bolsa Bay, which flows into Huntington Harbor, and out to the Pacific Ocean. BCER is owned by the California State Lands Commission and is managed by the Department. It is comprised of approximately 1,300 acres of coastal estuary that includes numerous habitats, including but not limited to, eel grass bed, salt marsh, coastal strand/sand dune, coastal sage scrub, freshwater wetland, and riparian woodland. In addition to providing habitat for many resident sensitive species, BCER serves as an important migratory stop and nesting ground for a multitude of avian species.

Our primary concerns regarding the proposed project are potential impacts to BCER resulting from increased storm flow conveyance and associated trash and debris. While the MND briefly states that trash will be removed once-monthly or after large storm events as part of "...typical

*Conserving California's Wildlife Since 1870*

Mr. Justin Golliher, PE  
Orange County Public Works  
April 16, 2019  
Page 2 of 2

future maintenance activities" (page 2-6), this proposed action is captured neither in the Project Description, nor as a mitigation measure. We recommend that the MND be amended to include a detailed discussion of possible impacts to BCER (including Bolsa Basin, Outer Bolsa Bay, and the Muted Tidal Pocket) that may occur at the terminus of C05 as a result of project implementation, increased storm flow, and associated trash and debris. This discussion should include a mitigation measure that reduces storm water flows and trash deposition within BCER below a level of significant. The Department recommends that a physical structure or mechanism be used to control the spread of unwanted debris (i.e. trash boom or trash wheel) in conjunction with a trash management/collection program documented in the MND.

We appreciate the opportunity to comment on the MND for this project and to assist the County in further minimizing and mitigating project impacts to biological resources. The Department requests an opportunity to review and comment on any response that the County has to our comments and to receive notification of the forthcoming hearing date for the project (CEQA Guidelines; §15073(e)). If you have any questions or comments regarding this letter, please contact Jennifer Turner, Environmental Scientist at (858) 467-2717 or via email at [jennifer.turner@wildlife.ca.gov](mailto:jennifer.turner@wildlife.ca.gov).

Sincerely,



Gail K. Sevens  
Environmental Program Manager  
South Coast Region

ec: Christine Medak (U.S. Fish and Wildlife Service)  
Scott Morgan (State Clearinghouse)