

DEPARTMENT OF PARKS AND RECREATION Diablo Range District 15751 Tesla Road Livermore, CA 94550

March 2, 2020

Governor's Office of Planning & Research

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STATE CLEARINGHOUSE

Gabriel Edwards
SWRCB, Division of Financial Assistance
Environmental Review Unit
1001 I Street, 16<sup>th</sup> Floor
Sacramento, CA 95814
Gabriel.Edwards@waterboards.ca.gov

RE:

Locke Water Works Company Water Line Intertie Project

SCH Number 2020019087

Dear Mr. Edwards,

This letter provides comments by the Diablo Range District of the California Department of Parks and Recreation (State Parks) on the State Water Resources Control Board (State Water Board) Initial Study/Mitigated Negative Declaration (IS/MND) for the Locke Water Works Company Water Line Intertie Project. Under the California Environmental Quality Act (CEQA), State Parks has a dual role as both a Trustee and a Responsible Agency. As a Trustee Agency, State Parks is responsible with protecting lands that are held in trust for the people of the State of California.

A portion of the proposed project will occur within the State Parks Delta Meadows unit. The IS/MND states that a permanent easement would need to be acquired from State Parks for operation and maintenance of the pipeline, and a 35-foot wide temporary construction easement would be obtained. This comment letter does not authorize issuance of permanent or temporary easement, or indicate that any type of permit or easement will be granted. Additional review and approval by State Parks will be needed, and will likely require additional information about proposed project activities to aid our evaluation of potential impacts within State Parks property. You are encouraged to initiate easement negotiations with State Parks as early in the project planning process as possible.

Impacts to natural and cultural resources within State Park units should be mitigated within the park unit where impacts occur in order to return park property and/or resources to a pre-project condition or better with the mitigation activities paid for by the project proponent. As you obtain required agreements/certification/permits, we encourage you to work with regulatory agencies to develop a mitigation framework for this project that will compensate State Parks for impacts to park property and the costs the department would incur to mitigate impacts, including those associated with increased invasive species management, permanent loss of native vegetation, and restoration of impacted native habitats and communities.

Several sensitive species are described as having low potential to occur, or not expected in the proposed project region, based on a lack of occurrences documented in the California Natural Biodiversity Database (CNDDB). State Parks has not conducted detailed wildlife or vegetation surveys for this unit to evaluate if there are sensitive species or habitats that would be negatively affected by proposed project activities.

If you have any questions about this comment letter or would like to discuss project activities on State Parks property, please contact Diablo Range District Environmental Coordinator, Gina Benigno, at 945-409-8392 or <a href="mailto:gina.benigno@parks.ca.gov">gina.benigno@parks.ca.gov</a>.

Sincerely,

Eduardo Guaracha

Diablo Range District Superintendent