

CCHD PPUP Public Comment Letter



Gray Davis
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
Interim Director

ACKNOWLEDGEMENT OF RECEIPT

DATE: November 13, 2002

TO: Tina Robinson
Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Dr., Suite 270
San Diego, CA 92108

RE: Crystal Cove State Park Crystal Cove Historic District Preservation and Public
Use Plan
SCH#: 2002021112

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is:

Review Start Date: October 17, 2002
Review End Date: December 2, 2002

We have distributed your document to the following agencies and departments:

California Coastal Commission
California Highway Patrol
Caltrans, District 12
Department of Fish and Game, Region 5
Department of Water Resources
Native American Heritage Commission
Office of Historic Preservation
Regional Water Quality Control Board, Region 8
Resources Agency
State Lands Commission

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

CCHD PPUP Public Comment Letter



Gray Davis
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Tal Finney
Interim Director

December 3, 2002

Tina Robinson
Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Dr., Suite 270
San Diego, CA 92108

Subject: Crystal Cove State Park Crystal Cove Historic District Preservation and Public Use Plan
SCH#: 2002021112

Dear Tina Robinson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on December 2, 2002, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

A handwritten signature in cursive script that reads "Terry Roberts".

Terry Roberts
Director, State Clearinghouse

CCHD PPUP Public Comment Letter

Document Details Report State Clearinghouse Data Base

SCH# 2002021112
Project Title Crystal Cove State Park Crystal Cove Historic District Preservation and Public Use Plan
Lead Agency Parks and Recreation, Department of

Type EIR Draft EIR
Description The California Department of Parks and Recreation is preparing the Crystal Cove Historic District Preservation and Public Use Plan. This plan will require a General Plan Amendment to the Crystal Cove State Park General Plan. The plan proposes a range of uses for the Historic District and adjoining areas that include long-term goals and guidelines for the appropriate types, locations, and designs of facilities that may be proposed in the future as well as specific proposals that will be implemented with current or near-term funding. The proposed uses include park operations (visitor center, kiosk, restrooms, offices, maintenance, staff housing), overnight accommodations, utility upgrades, and educational or interpretive facilities. These uses will be in conformance with the Department's policies for adaptive use in a Historic District. The plan will also establish interpretive programs and activities proposed or approved by the Department.

Lead Agency Contact

Name Tina Robinson
Agency Department of Parks and Recreation
Phone 619-220-5300 **Fax**
email
Address Southern Service Center
 8885 Rio San Diego Dr., Suite 270
City San Diego **State** CA **Zip** 92108

Project Location

County Orange
City Newport Beach, Laguna Beach
Region
Cross Streets Approx. 1 mile south of Newport Coast Drive on Pacific Coast Highway
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways Pacific Coast Hwy (Hwy 1)
Airports
Railways
Waterways
Schools
Land Use State Park/existing vacation cottages as residences

Project Issues Aesthetic/Visual; Archaeologic-Historic; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Population/Housing Balance; Public Services; Sewer Capacity

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Water Resources; California Highway Patrol; Caltrans, District 12; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; State Lands Commission

Date Received 10/17/2002 **Start of Review** 10/17/2002 **End of Review** 12/02/2002

Note: Blanks in data fields result from insufficient information provided by lead agency.

CCHD PPUP Public Comment Letter



Darlene J. Bloom
Interim County Clerk-Recorder
P. O. Box 238
Santa Ana, CA 92702

Dept of Park & Recreation

RECEIVED
DEC 06 2002
BY: _____

Office of the Orange County Clerk-Recorder

Memorandum

SUBJECT: Environmental Impact Reports
Amendment of "Public Resources Code, Section 21092.3"

The attached notice was received, filed and a copy was posted on 10/18/02

It remained posted for 30 (thirty) days.

Darlene J. Bloom
Interim County Clerk-Recorder
in and for the County of Orange

By: ROSE M. SOLORIO Deputy

Public Resource Code 21092.3

The notices required pursuant to Sections 21080.4 and 21092 for an environmental impact report shall be posted in the office of the County Clerk of each county *** in which the project will be located and shall remain posted for a period of 30 days. The notice required pursuant to Section 21092 for a negative a negative declaration shall be so posted for a period of 20 days, unless otherwise required by law to be posted for 30 days. The County Clerk shall post notices within 24 hours of receipt.

Public Resources Code 21152

All notices filed pursuant to this section shall be available for public inspection, and shall be posted ***within 24 hours of receipt in the office of the County Clerk. Each notice shall remain posted for a period of 30 days.

***Thereafter, the clerk shall return the notice to the local lead agency ***within a notation of the period it was posted. The local lead agency shall retain the notice for not less than nine months.

Additions or changes by underline; deletions by ***

CCHP PPUP Public Review Comment Letter

STATE OF CALIFORNIA - RESOURCES AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF PARKS AND RECREATION
8885 Rio San Diego Drive Suite 270
San Diego, CA 92108



NOTICE OF AVAILABILITY Environmental Impact Report Crystal Cove Historic District Preservation and Public Use Plan Crystal Cove State Park

The California Department of Parks and Recreation has prepared a Draft Environmental Impact Report (DEIR) with the intent of adoption for the Crystal Cove Historic District Preservation and Public Use Plan at Crystal Cove State Park between the cities of Laguna Beach and Newport Beach in Orange County. The project will require a General Plan Amendment to the Crystal Cove State Park General Plan, an approved Public Works Plan.

COPIES OF THE DEIR AND TECHNICAL STUDIES ARE AVAILABLE for review at the Southern Service Center of the California Department of Parks and Recreation, 8885 Rio San Diego Drive Suite 270 San Diego, CA 92108 during business hours. Copies are also available for review at the Orange Coast District Office, 3030 Avenida del Presidente San Clemente, CA 92672; Crystal Cove State Park, 8741 Coast Highway, Laguna Beach, CA; Laguna Beach Public Library, 363 Glenneyre St. Laguna Beach, CA; the Government Information Dept., Main Library, UC Irvine, Irvine, CA; or at the Newport Beach Public Library, 1000 Avocado Ave. Newport Beach, CA. If there are any questions, please call Tina Robinson at 619.220.5300.

THE REVIEW PERIOD, during which the California Department of Parks and Recreation will receive comments upon the proposed DEIR, commences on October 15, 2002. **The deadline for receiving written comments regarding the adequacy of the DEIR is December 2, 2002. Comments may be delivered to Tina Robinson at the Southern Service Center or faxed to 619.220.5400.**

THIS NOTICE WAS PUBLISHED in the Orange Coast Daily Pilot and the Coastline News in October, 2002.

POSTED

OCT 18 2002

DARLENE J. BLOOM, INTERIM CLERK-RECORDER
By PS DEPUTY

California State Parks Response

1 The **Mission** of State Parks includes the protection of both natural and cultural resources. The stated goals in the *PPUP* are a reflection of State Parks **Mission** as appropriate for a National Register of Historic Places property. As stated in the Preliminary *PPUP* (page 64), State Parks commits to supporting these goals through the use of its park management staff. State Parks further contends that the biological and water quality analysis for the *PPUP* and its implementation were adequately addressed in the DEIR in Sections 3.8, 4.22-27, and 4.2.11. Site visits and investigations of the project's Area of Potential Effect (APE) for natural resources are identified in the October 2002 Biological Resources Report. These included focused surveys for sensitive species.

As a result of these surveys 8 California gnatcatchers were located within the survey area as depicted in Figure 3.4 of DEIR, and no other sensitive species were detected within the APE. Cactus wrens were also targeted for surveys because they occur in the park (Table B.1 of DEIR and Table 1 of the October 2002 Biological Resources Report), but none were found within the APE. In addition, coastal sage scrub and riparian habitats located within the approximately 50 acre APE (which includes areas adjacent to the project footprint) were mapped and quantified (Figure 3.5 of the DEIR). Additionally, changes to surface hydrology are minor and are noted in Section 4.2.11 of the DEIR. The Los Trancos Parking area and the Historic District are existing land use features actively used for recreation that will be primarily located within the same footprint.

#2 State Parks respectfully disagrees. Please see response #1. Although the existing Los Trancos parking lot is currently underused during the off peak season, it experiences high use during peak beach visitation. The implementation of the *PPUP* will cause an increase in use but not an increase in parking area footprint. The parking areas closest to the beach and creek mouth are being eliminated or reduced in use, which removes potential pollutants from cars to an area farther from the sensitive water resources. The small new parking lot (Figure 2.2 S-4) will provide parking that previously existed within the Historic District in a location that also allows for trash removal to be located outside the Historic District and away from Los Trancos Creek. Predicted turnover of 2.5 in the Los Trancos parking area (approximately 1000 cars) is a worst-case analysis that would only create a nominal increase in the polluted runoff to Los Trancos Creek because the creek currently receives the runoff from Pacific Coast Highway. Due to previous restoration efforts, there is a large buffer of Coastal Sage Scrub between the parking lot and Los Trancos Creek.

CCHP PPUP Public Review Comment Letter



Sent by FAX (619) 220-5400

December 2, 2002

Tina Robinson, Environmental Coordinator
Southern Service Center
Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

RE: Comments on Crystal Cove Historic District
Preservation and Public Use Plan (PPUP) and
Draft Environmental Impact Report (DEIR)

Dear Ms. Robinson:

1 The California State Coastal Conservancy offers the following comments on the Crystal Cove Historic District ***Preservation and Public Use Plan*** and Draft Environmental Impact Report (DEIR) for the Plan and its implementation. While the stated goal of the PPUP is to protect both the natural, as well as the cultural and historic resources of the Crystal Cove Historic District (CCHD), the companion documents fail to adequately address the protection, restoration and enhancement of the District's natural resources, including sensitive habitat areas, creek and riparian resources and protecting and enhancing coastal water quality.

2 The PPUP's Natural Resources Preservation Objectives do not adequately address Los Trancos Creek and its riparian resources and fail to adequately describe or address coastal water quality goals. Similarly, the DEIR does not adequately address the same environmental concerns. The use and operation of the Los Trancos parking lot is an essential component of the operation and use of CCHD. Significantly, the increased use of the Los Trancos parking lot may have the potential for substantially increased polluted runoff to Los Trancos Creek and the nearshore ocean habitats at the CCHD. The DEIR fails to identify site design changes and/or Best Management Practices (BMPs) which would minimize or eliminate any adverse environmental impacts from the increased use of the Los Trancos parking lot.

1330 Broadway, 11th Floor
Oakland, California 94612-2530
510-286-1015 Fax: 510-286-0470

C a l i f o r n i a S t a t e C o a s t a l C o n s e r v a n c y

California State Parks Response

#2 cont.) However, in the interest of improving water quality, and in compliance with the conditions applied from the Santa Ana Regional Water Quality Control Board, State Parks will investigate utilizing mechanical devices to treat runoff, as appropriate. Installation of such mechanical devices would require the removal of some parking spaces. Site constraints within the project area severely limit the options available for Best Management Practices (BMPs). The BMPs identified in Sections 2.1.1, 2.2, 4.2.11 did not address the Los Trancos parking area because the coastal sage habitat restoration areas currently provide approximately a 450 foot vegetated buffer between the parking lot and creek. Additional buffers would require the removal of existing parking spaces, causing a recreational impact.

#3 State Parks respectfully disagrees. Please also see response #1 and Section 4.2.2, Mitigation Veg-3. The Historic Landscape Management Plan has a primary goal to preserve the historic landscape but all noncontributing exotics such as Castor Bean, Periwinkle and Arundo Donax will be removed. It is expected that natives appropriate to preserving the historic landscape and fire management goals will be replanted thus providing cover for endangered species such as the California gnatcatcher that disperse through the Historic District. As stated in Section 3.3.3, the lower section of Los Trancos Creek is no longer in a natural channel and was realigned and channelized during the period of historic significance. Subsequent to the historic period, additional flood repair has occurred. To restore the creek would cause significant adverse effects to historic resources. It would move the creek into the hollow area and affect a number of historic structures central to the Historic District, including the garages, the bridge, the studio and several cottages. Furthermore, restoring the creek mouth to a “natural undeveloped condition” may also severely restrict or eliminate adequate public access and ADA access to Crystal Cove Beach as well as emergency/fire protection vehicle access to beachfront areas.

#4 State Parks respectfully disagrees. Restoration of Los Trancos Creek is not a part of the Preservation and Public Use Plan. Please see responses #1, #2, and #3. New BMPs for road improvements include filtering of runoff and are incorporated into the project description (Section 2.1.1) and Section 4.2.11.

#5 State Parks does not encourage habitat restoration in high recreation use areas such as the beach at Crystal Cove. Should the habitat be fully restored and snowy plovers nest on the beach, the beach would be closed to recreation, causing an adverse recreation impact. Other areas are more suitable for restoration than an area that has

CCHP PPUP Public Review Comment Letter

2 Both the PPUP and the DEIR need to include more extensive and detailed design and operational BMPs for storm water management and control of polluted runoff. These could be developed to provide the visiting public with a watershed management educational experience. BMPs could include vegetated swales, filters, storm-water percolation areas, constructed wetlands. Changes to the existing parking lot with additional landscaping and tree planting should be considered in order to provide for reduced polluted runoff, as well as introducing additional native habitat transition areas.

Both the PPUP and the DEIR inadequately address the natural resources of Los Trancos Creek. While the CCHD contains an abundance of exotic, non-native species, site restoration and creek slope stabilization should include the use of native species as appropriate. The PPUP and DEIR should be modified to state as a goal the re-introduction of native species to the maximum extent possible.

3 In addition, both the PPUP and the DEIR need to be modified to address more adequately creek restoration and enhancement opportunities. The PPUP and the DEIR need to be modified to require the removal of invasive species along the Creek and adjacent hillsides, including removal of Castor Bean, Periwinkle and Arundo Donax to allow for native species to be replanted and to provide better habitat for endangered species, such as the California gnatcatcher. Restoration of native riparian and deep-rooted natives needs to be included in the slope stabilization along the creek channel. Some of this area is a native willow habitat which needs to be maintained, protected and duplicated throughout the riparian corridor including the Village Center.

The PPUP and the DEIR should be modified to include consideration restoration and enhancement of the mouth of Los Trancos Creek at the center of the CCHD. In this regard, both the PPUP and the DEIR should include consideration of the relocation of the structures immediately adjacent to the creek mouth. This would address future peak storm events that may jeopardize one or more of the structures and the supporting creek retaining wall improvements. Consideration of removing one of more structures immediately adjacent to the creek mouth (or located within the historic meander of the creek mouth) would allow for consideration of the re-establishment of natural creek environments, such as riparian brackish wetland features.

4 Finally, Los Trancos Creek stewardship and restoration/enhancement requirements need to be expanded to address long-term management needs. The water quality of Los Trancos Creek impacts the creek mouth, tide-pool and related, nearshore marine communities. BMPs need to be identified to address all water quality issues associated with Los Trancos Creek water quality and habitat restoration.

5 The PPUP and the DEIR needs to more fully address restoring coastal dune habitat to maximize species protection and enhancement. The Western snowy plover, a Federally-listed endangered species, "... have been observed on the beaches of Crystal Cove State Park during the wintering seasons." (DEIR, page 42) Being one of

California State Parks Response

beach recreation as part of its history for the last 75 years. Where appropriate, and in concert with the Historic Landscape Management Plan, limited dune restoration and revegetation may be incorporated similar to the small dune restoration already completed.

#6 Parking alternatives for operations vehicles (up to 20 spaces) were considered during development of the PPUP. Due to site constraints, the site chosen was the best alternative to minimize impacts to natural, cultural, and aesthetic resources and the recreational experience. By incorporating the use of a small shuttle, overnight guests, docents, researchers, artists and others needing to drop off materials or equipment will be able to utilize the existing parking at Los Trancos. The use of the existing Los Trancos parking lot is a joint use for PPUP operations and day use. This eliminated the need for larger parking facilities within the Historic District. However, park operations parking spaces and trash removal in close proximity to the district will be needed to respond to emergency or maintenance issues. Rather than have these vehicles utilize the existing parking areas within the Historic District, the construction of the small parking lot was proposed. Please see Sections 2.1.1, 2.3.8 and 2.3.9 for additional information. Section 4.2.2 further indicates that, should many-stemmed dudleya be detected within the parking lot footprint, it will be redesigned to avoid direct impacts. Due to the limited rainfall in 2002, it was determined that a spring survey in 2003 would provide better field information. It is the intention of State Parks to avoid direct impacts to the many-stemmed dudleya.

#7 Human load impacts on natural resources are addressed in the visitor capacity management section within the PPUP, pages 78 to 89, and in the EIR in Sections 4.2.5 and 7.1.3. These issues include monitoring and appropriate management to protect sensitive natural resources close to and within the Historic District. CEQA requires an analysis of reasonably foreseeable impacts caused by a potential project, over and above the existing conditions. The area is currently popular and open to the public but it is anticipated that the use will be higher with implementation of the project. In keeping with the State Parks *Mission*, natural resource protection will be incorporated into the operation of the Historic District. Since the operational aspects of implementing the PPUP will be occurring in phases, State Parks will have the opportunity to concurrently implement pilot preservation and research programs under the CARE program. Additionally, there is ongoing monitoring and research at the site. Should a management program prove ineffective in protecting resources, more restrictive measures may be utilized as outlined in Section 7.1.3.

CCHP PPUP Public Review Comment Letter

5 the last remaining wild coastal landscapes in Orange County, the PPUP and the DEIR for CCHD need to address restoration and enhancement opportunities. Since "there is very little native vegetation in the beach area and available nesting habitat for the Snowy plover is low quality," (DEIR, page 60) both the PPUP and the DEIR should include consideration of habitat restoration and enhancement to provide increased habitat for the Western snowy plover.

Currently, "vegetation in the disturbed coastal dune habitat area of the district is dominated with non-native plants, sea fig, sea rocket and other planted ornamentals" (DEIR, page 40). Both the PPUP and the DEIR should include consideration of coastal dune habitat restoration and enhancement to the maximum extent feasible.

6 The PPUP currently locates Operations Parking and access road in the Many-stemmed Dudleya (*Dudleya multicaulis*) habitat area, all listed sensitive plant species. Closely nearby are habitat for the federally-listed California gnatcatcher and the sensitive plant species *Chorizanthe staticoides*. The PPUP and the DEIR should be modified to include consideration of alternative location(s) for the Operations Parking, including reducing the number of parking spaces and/or locating in a joint use setting, in order to minimize or eliminate adverse impacts on sensitive habitat areas.

7 Overall, the PPUP and the DEIR need to more adequately address the human load impacts on sensitive habitats within the CCHD. Human load limits are addressed in the context of limits on automobile and other vehicle parking, and not on the basis of impacts on natural resources. As this coastal open space becomes increasingly rare, precious and isolated, the impact of high volume coastal visitation may adversely impact the natural resources of the CCHD. This is especially true in the context that Crystal Cove State Park (and the Crystal Cove Historic District) is either within and/or immediately adjacent to an NCCP area, the goal of which is "to provide long term regional protection and perpetuation of the natural vegetation and wildlife diversity, while allowing compatible and appropriate development and growth." (DEIR, page 39)

If you have any questions regarding the comments enclosed herein, please do not hesitate to contact me at (510) 286-4172. Thank you for the opportunity to comment.

Sincerely,


Marc Beyer

Project Manager

California State Parks Response

#8 Remediation of slope instabilities within Caltrans' right-of-way is not planned in the first phase of implementation because improvements in the vicinity of these slopes will be deferred to in future phases according to available funding. At such time subsequent phased improvements are proposed that may be at risk due to existing PCH slope conditions, DPR and Caltrans Geotech South should jointly pursue additional testing and funding identification for mitigation as needed.

#9 No alterations to on-site drainage to Los Trancos Creek or to its channel are proposed by this project.

CCHP PPUP Public Review Comment Letter

DEPARTMENT OF TRANSPORTATION

DISTRICT 12
3347 Michelson Drive Suite 100
Irvine, CA. 92612-0661



FAX & MAIL

December 2, 2002

Tina Robinson
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

File: IGR/CEQA
SCH#: None
Log #: 874D
SR: PCH

Subject: Crystal Cove Historic District Preservation and Reuse Plan

Dear Ms. Robinson,

Thank you for the opportunity to review and comment on the **Draft Environmental Impact Report including Crystal Cove State Park General Plan Amendment for the Crystal Cove Historic District Preservation and Reuse Plan dated October 2002**. This plan will propose a range of uses including visitor center, kiosk, restrooms, offices, maintenance, staff housing, over night accommodations, utility upgrades, and educational or interpretive facilities. The Plan will also require a General Plan Amendment to the Park. The Historic the State Park is located between Laguna Beach and Newport Beach in the County of Orange. The project site is located east of Pacific Coast Highway (PCH).

Caltrans District 12 status is a responsible agency on this project and has the following comments:

- 8
1. The office of Geotechnical Design will review the validity of the "possible remedial measures for unsafe slopes" as stated on Page 5 of the subject report, once the slope stability and related issues are submitted for our review. The review would be based on the following:
 - a) Include the location of all the borings on a geotechnical boring location plan, where the limits of the State Route are shown.
 - b) Show all the geotechnical strength parameters relevant to the selection of the design soil parameters on a plot diagram.
 - c) Explain clearly and concisely, with the help of the plot diagram how the design soil properties, as cited on page 3 of the subject report are derived.
 - d) Include the cross sections used for the analysis of the gross slope stability in the report. Include all the relevant geotechnical data on these cross sections.
 - e) Please note that increase for cohesion component for pseudo-static conditions is not allowed.
 - f) Provide slope stability calculation, with the data included.
 - g) Provide your backup information (i.e. calculations, assumptions and analysis) for items 2 and 3 as stated on page 5 of the subject report.
- 9
2. Please refer to our Hydraulics comments in Caltrans correspondence dated 4/4/01.

California State Parks Response

#10 Should the project impact Caltrans right of way, a state park archaeologist will determine, in coordination with Caltrans' archaeologist, whether or not the site addressed in Sections 3.9, 4.2.8 and 7.1.5 is still intact. Any potential adverse impacts to archaeology will be mitigated below a level of significance. All below-grade work with the areas identified above will require a qualified archaeologist to test prior to and/or monitor the construction.

#11 Fig 4.1 lists both the projected increase of no-build traffic per the Austin/Foust Associates study, and the estimated increase of traffic with the project. Also, appropriate excerpts from the A&F study are available upon request. Any special events would be coordinated with Caltrans traffic operations or the California Highway Patrol with appropriate traffic mitigation which may include special signage or traffic control.

#12 DPR will apply for appropriate encroachment permits for any work or activities proposed within Caltrans' right-of-way.

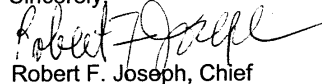
#13 The April 4, 2001 and June 12, 2001 letters refer to the *Investigations and Interim Protection Plan*. Since the implementation of that plan, studies and detailed plans have been completed as discussed in the *PPUP* EIR. The new entrance kiosk and turnaround will be located over 250 feet from the entrance at PCH. Also, please see response #12. The items detailed in the March 27, 2002 letter have been addressed in the EIR in Sections 3.5, 4.2.2, 4.2.3, 4.2.4, 4.2.8, 4.2.9, and 4.2.11. State Parks will continue to coordinate with Caltrans for future activities outlined in the *PPUP* and all encroachment permits/permit conditions.

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December 2, 2002
Page 2

- 10 [3. Based on the information presented in The DEIR, further investigation may be required to determine the significance of any cultural resources should the project impact Caltrans right of way. In addition, a cultural monitor would be required.
- 11 [4. *Section 4.2.9, Traffic*, page 63, of the DEIR, describes the amount of Vehicles Per Hour (VPH) that the proposed project is expected to increase. There is also a discussion of potential special events at the Historic District, and how these events could cause temporary traffic delays on PCH. The DEIR needs to include measures that will avoid, mitigate, and minimize transportation impacts. Also, a traffic report by Austin-Foust Associates is referenced in this section. The DEIR should include technical appendices that contain any such reports. Please include the technical appendices when the Final Environmental Impact Report (FEIR) is circulated.
- 12 [5. All work within the State Right of Way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control, including production of a Water Pollution Control Program (WPCP) or Storm Water Pollution Prevention Plan (SWPPP) as required. Any runoff draining into Caltrans Right of Way from construction operations, or from the resulting project, cannot be approved by District 12 Environmental Planning. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans roadways or facilities. (See Attachment: *Water Pollution Control Provisions*).
- 13 [6. In addition to this letter please refer to our previous Caltrans comment letters (included in the DEIR).
- Please continue to keep us informed of this project and other future developments, which could potentially impact our Transportation facilities. If you have any questions or need to contact us please do not hesitate to call Maryam Molavi at (949) 724-2267.

Sincerely,



Robert F. Joseph, Chief
Advanced Planning Branch

C: Terry Roberts, OPR
Ron Helgeson, HDQRTRS Planning
Raouf Moussa, Traffic Operations
Praveen Gupta, Environmental Planning, A
Leslie Mandersheid, Environmental Planning, B
Nooshin Yossefi, Project Management
Roger Kao, Hydraulics
Grace Pina-Garrette, NPDES

California State Parks Response

No Response Necessary

CCHP PPUP Public Review Comment Letter

ENVIRONMENTAL REVIEW REQUIREMENTS FOR ENCROACHMENT PERMITS

Any Party, outside of Caltrans, that does work on a State Highway or Interstate Highway in California needs to apply for an encroachment permit. To acquire any encroachment permit, environmental concerns must be addressed. Environmental review of encroachment permit applications may take 3 weeks if the application is complete or longer if the application is incomplete. For soil disturbing activities (e.g. geotechnical borings, grading, usage of unpaved roads from which dirt and other materials may be tracked onto the State/Interstate highways, etc.), compliance with Water Quality and Cultural Resources Provisions are emphasized. Surveys may/ may not be soil-disturbing activities, depending on the site and survey method.

A complete application for environmental review includes the following:

1. If an environmental document (CE, EIR/EIS, ND, etc.) has been completed for the project, copy of the final, approved document must be submitted with the application.
2. **Water Quality Provision:** All work within the State Right of Way must conform to Caltrans Standard Plans and Standard Specifications for Water Pollution Control including production of a Water Pollution Control Program or Storm Water Pollution Prevention Plan as required. The applicant must provide Encroachments with a copy of the Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) to be implemented for construction activities impacting Caltrans Right of Way, prepared for this as required by the NPDES Statewide Storm Water Permit for General Construction Activities. If no SWPPP has been prepared for this project, then the applicant must follow the requirements described in the attached Water Pollution Control Provisions (please see attachment).
3. **Cultural Resources Provisions:** If not included in the environmental document, before permit approval and project construction, the encroachment permit applicant must complete a Cultural Resource Assessment pursuant to Caltrans Environmental Handbook, Volume 2, Appendix B-1, and Exhibit 1, as amended. The Cultural Resources Assessment ascertains the presence or absence of cultural resources within a one-mile radius of the project area and evaluates the impact to any historical/cultural resource. Cultural Resources include "those resources significant in American history, architecture, archaeology, and culture, including Native American Resources" (Caltrans Environmental Handbook, Volume 2, Chapter 1, as amended)]. The Cultural Resource Assessment must include:
 - a) a clear project description and map indicating project work, staging areas, site access, etc.;
 - b) a Record Search conducted at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. For information call (714) 278-5395;
 - c) proof of Native American consultation. Consultation involves contacting the Native American Heritage Commission (NAHC), requesting a search of their Sacred Lands File, and following the recommendations provided by the NAHC. For information call (916) 653-4082;
 - d) documentation of any historic properties (e.g. prehistoric and historic sites, buildings, structures, objects, or districts listed on, eligible for, or potentially eligible for listing on the National Register of Historic Places) within a one mile radius of the project area;
 - e) and a survey by qualified archaeologist for all areas that have not been previously researched.

The SCCIC and NAHC have an approximate turn around time of 2 weeks.

4. **Biological Resources Provisions:** Work conducted within Caltrans Right of Way should have the appropriate plant and wildlife surveys completed by a qualified biologist. If the information is not included in the environmental document, Environmental Planning requests that the applicant submit a copy of the biological study, survey, or technical report by a qualified biologist that provides details on the existing vegetation and wildlife at the project site and any vegetation that is to be removed during project activities. Official lists and databases should also be consulted for sensitive species such as the California Natural Diversity Database and lists provided by the U.S. Fish and Wildlife Service and the California Department of Fish and Game. Any impacts that affect waterways and drainages and/or open space during construction, or that occur indirectly as a result of the project must be coordinated with the appropriate resource agencies. As guidance, we ask that the applicant include:
 - a) clear description of project activities and the project site
 - b) completed environmental significance checklist (not just yes and no answers, but a description should be given as to the reason for the response),
 - c) staging/storage areas noted on project plans,
 - d) proposed time of year for work and duration of activities (with information available),
 - e) any proposed mitigation (if applicable to the project),
 - f) and a record of any prior resource agency correspondence (if applicable to the project).

California State Parks Response

No Response Necessary

**ATTACHMENT
CALTRANS DISTRICT 12**

WATER POLLUTION CONTROL PROVISIONS

Any runoff draining into Caltrans Right of Way must fully conform to the current discharge requirements of the Regional Water Quality Control Board (RWQCB) to avoid impacting water quality. Permittee shall fully conform to the requirements of the Caltrans Statewide National Pollutant Discharge Elimination System (NPDES) Storm Water Permit, Order No. 99-06-DWQ, NPDES No. CAS000003, adopted by the State Water Resources Control Board (SWRCB) on July 15, 1999, in addition to the BMPs specified in the Caltrans Storm Water Management Plan (SWMP). When applicable, the Permittee will also conform to the requirements of the General NPDES Permit for Construction Activities, Order No. 99-08-DWQ, NPDES No. CAS000002, and any subsequent General Permit in effect at the time of issuance of this Encroachment Permit. These permits regulate storm water and non-storm water discharges associated with year-round construction activities.

Please note that project activities should pay extra attention to storm water pollution control during the "Rainy Season" (October 1st – May 1st) and follow the Water Pollution Control BMPs to minimize impact to receiving waters. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans Right of Way.

For all projects resulting in 2 hectares (5 acres) or more of soil disturbance or otherwise subject to the NPDES program, the Contractor will develop, implement, and maintain a Storm Water Pollution Prevention Plan (SWPPP) conforming to the requirements of the Caltrans Specification Section 7-1.01G "Water Pollution Control", Caltrans Statewide NPDES Permit, the General NPDES Permit for Construction Activities, and the Caltrans Storm Water Quality Handbooks "Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Program (WPCP) Preparation Manual", and "Construction Site Best Management Practices (BMPs) Manual" effective November 2000, and subsequent revisions. In addition, the SWPPP must conform to the requirements of the SWRCB Resolution No. 2001-046, the Sampling and Analytical Procedures (SAP) Plan.

For all projects resulting in less than 2 hectares (5 acres) of soil disturbance or not otherwise subject to the requirements of the NPDES program, the Contractor will develop, implement, and maintain a Water Pollution Control Program (WPCP) conforming to the requirements of Caltrans Specifications Section 7-1-.01G, "Water Pollution Control", and the Caltrans Storm Water Quality Handbooks "Storm Water Pollution Prevention Plan (SWPPP) and Water Pollution Control Program (WPCP) Preparation Manual", and "Construction Site Best Management Practices (BMPs) Manual" effective November 2000, and subsequent revisions.

Copies of the Permits and the Construction Contractor's Guide and Specifications of the Caltrans Storm Water Quality Handbook may be obtained from the Department of Transportation, Material Operations Branch, Publication Distribution Unit, 1900 Royal Oaks Drive, Sacramento, California 95815, Telephone: (916) 445-3520. Copies of the Permits and Handbook are also available for review at Caltrans District 12, 3347 Michelson Drive, Suite 100, Irvine, California 92612, Telephone: (949) 724-2260. Electronic copies can be found at <http://www.dot.ca.gov/hq/construc/stormwater.html>

California State Parks Response

#14 State Parks does not intend to construct a Class I bikeway into the Historic District for two reasons: 1) Given the site constraints and resource sensitivity of the Historic District, there is no opportunity to physically locate the path 2) One of the primary goals of the *PPUP* is to make the Historic District pedestrian friendly, therefore, bicyclists will need to slow down or get off their bikes to enter the core area anyway. Bicyclists will be able to access the district on either the pedestrian path from Los Trancos or on the entrance road.



County of Orange
Planning & Development Services Department

THOMAS B. MATHEWS
DIRECTOR

300 N. FLOWER ST.
SANTA ANA, CALIFORNIA

MAILING ADDRESS:
P.O. BOX 4048
SANTA ANA, CA 92702-4048

NCL 02-127

December 2, 2002

Tina Robinson
Associate Park and Recreation Specialist
California Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

SUBJECT: DEIR for the Crystal Cove Historic District Preservation and Public Use Plan

Dear Ms. Robinson:

The above referenced item is a Draft Environmental Impact Report (DEIR) for the California Department of Parks and Recreation. The plan will propose a range of uses for the Historic District and adjoining areas that include long-term goals and guidelines for the appropriate types, locations, and designs of facilities that may be proposed in the future as well as specific proposals that will be implemented with current or near-term funding. The proposed uses include park operations (visitor center, kiosk, restrooms, offices, maintenance, staff housing), overnight accommodations, utility upgrades, and educational or interpretive facilities. The project site is within Crystal Cove State Park, on Pacific Coast Highway north of Laguna Beach, and near Newport Coast Drive

The County of Orange has reviewed the DEIR and offers the following comments:

BIKEWAYS

1. In our NOP comments, we suggested constructing a Class I (paved off-road) bikeway to connect the Historic District to Crystal Cove Regional Bikeway (an existing regional bikeway traversing most of the park). The text discusses realigning the existing bikeway. However, there appears to be no mention of the suggested bikeway connection. Figure 2.2, Sheet S-9, depicts a "New Trail" that appears to connect to an "existing unimproved trail", but it is not clear if Crystal Cove Regional Bikeway will connect to the Historic District via a paved, off-road, pedestrian/bikeway connection.

14

California State Parks Response

#15 Determination of scour depth is a design parameter. The hydraulic behavior of Los Trancos Creek is addressed in the October 2002 Coastal/Hydrology technical study by Coastal Environments and will be incorporated in the project design. An alternative that attached to the vehicle bridge in the Historic District was investigated but eliminated because of potential for bridge failure during extreme flood events. Another alternative that would have required pumping up the entrance road to PCH and then downcoast to the existing municipal sewer connection was eliminated for two reasons. First, it would require crossing a section of PCH fill slope that is currently exhibiting slope instabilities and, second, it would be less efficient for pumping and energy due to the circuitous route.

#16 Please see Response # 2

#17 Please see Sections 2.1.1 and 4.2.11 in the EIR. State Parks intends to implement a proactive water quality management program in the project area, including the possibility of using alternate paving surfaces where appropriate. The proposed project will meet or exceed the current water quality control standards required by the State Regional Water Quality Control Board. Water permeable parking lot and road surfaces are still being investigated for effectiveness over time. Additionally, those areas with slopes cannot sustain heavy rain without erosion and areas with frequent use may cause dust impacts on adjacent vegetation. Alternate surfaces such as soil binders and porous paving will be analyzed and implemented when appropriate.

Although currently being used in selected locations, porous pavement (AC and concrete) has its challenges. In order for it to be effective, constant maintenance is required to postpone the pours from clogging. This includes regular sweeping to remove sediment and preventing drainage from natural areas (which brings silt) draining on to the paved surface. Unfortunately, both of these actions only slow down the clogged process and may preclude use of porous pavement at this location. They are also a budgetary commitment for park operations.

Based on the findings on the type and quantities of potential pollutants found within the Reef Point parking lot in the Stormwater Sampling Report recently conducted for Crystal Cove State Park, the Department will implement BMP's similar to those in place at Reef Point.

#18 BMP's include a vacuuming program of twice per month (June – October) and once per month (November – May), daily litter removal from all parking areas, and inspection and removal of litter from culverts, drainages and other areas.

#19 State Parks will provide a discussion about Los Trancos Creek habitat in an interpretive plan but it will not be the main focus of the Historic District. The interpretive theme will include the natural resources in the immediate area.

CCHP PPUP Public Review Comment Letter

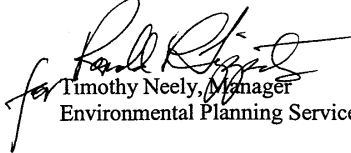
- 14 [2. For clarification, we suggest inclusion of a single page exhibit that clearly shows the trail system within the entire Historic District and its immediate vicinity. Moreover, we suggest identification of trails in the exhibit legend as "off-road, paved" and "off-road, unpaved".

WATERSHED

- 15 [3. Placement of water, sewer and non-potable irrigation lines 48 inches below the depth of bed scour in Los Trancos Creek is not recommended. The depth of lines seems inadequate. Please provide technical data supporting this design. Some urban streams in Orange County have experienced tremendous down cutting and erosion. Relocating utilities after storm damage is very costly and disruptive to the stream system. We would like to know what other alternatives have been explored regarding location of these utilities.
- 16 [4. The project is located in an area described as "of extreme sensitivity to water quality impacts". It is suggested that state of the art water quality best management practices be required for the project. These may include, but are not limited to: construction techniques; urban run-off filter systems; capture of storm water on site and use of pervious materials where possible.
- 17 [5. It is recommended that impervious surfaces be used only where absolutely necessary. It is strongly suggested that the use of a pervious surface be considered for all circulation systems on the site, including roads, bike paths and pedestrian access ways.
- 18 [6. We would like the frequency of litter removal from culverts, drainages and other areas such as Los Trancos Creek to be provided.
- 19 [7. Since part of the Vision Statement for the Historic District is to "make these values available for the enjoyment and education of all", we suggest an educational component of the project include information about the Los Trancos Watershed as well as water quality issues of both inland and coastal waters.

Thank you for the opportunity to respond to the DEIR. If you have questions, please contact Charlotte Harryman at (714) 834-2522.

Sincerely,


for Timothy Neely, Manager
Environmental Planning Services Division

ch

California State Parks Response

No Response Necessary

CCHP PPUP Public Review Comment Letter



**ASSOCIATION of
GOVERNMENTS**

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San Bernardino County: Jon Mikels, San Bernardino County • Bill Alexander, Rancho Cucamonga • Lawrence Dale, Barstow • Lee Ann Garcia, Grand Terrace • Susan Lien, San Bernardino • Gary Oviatt, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Tom Young, Port Hueneeme

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

Printed on Recycled Paper 559-9/05/02

October 31, 2002

Ms. Tina Robinson
Environmental Coordinator
Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108

**RE: SCAG Clearinghouse No. I 20020560 Crystal Cove Historic District
Preservation and Public Use Plan**

Dear Ms. Robinson


Thank you for submitting the **Crystal Cove Historic District Preservation and Public Use Plan** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Crystal Cove Historic District Preservation and Public Use Plan**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **October 16-31, 2002 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,


JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review

California State Parks Response

#20 Thank you for your comments. State Parks is interested in utilizing the potential benefits to water quality offered by porous paving or pervious concrete. Please see responses # 2 and # 17.

#21 No new seawall protective structures will be incorporated into the *PPUP* or its implementation. Because it would be a significant adverse effect to historic resources to move the cottages, first sandbagging or sand replenishment would be considered for protection of the structures. Last resort treatment for the historic structures would be moving if there were an eminent threat of loss. A decision by a qualified team of historians and cultural resource professionals would be required at the time of the threat. Although there are currently risks in the Historic District due to wave action, it is not currently anticipated that any cottages will be lost in the near future. Should such a risk be determined, options for the cottages would include recordation and removal or moving to another site.

CCHP PPUP Public Review Comment Letter

NOV-23-02 SAT 02:04 PM

FAX:

PAGE 1

Surfrider Foundation Newport Beach Chapter
323 Jasmine Ave., Corona del Mar, CA 92625

November 23, 2002

Tina Robinson, Associate Park and Recreation Specialist
California Department of Parks and Recreation
Southern Service Center
8850 Rio San Diego Drive, Suite 270
San Diego, CA 92108

Dear Ms. Robinson:

This responds to the Crystal Cove Historic District DEIR, SCH# 2002021112, dated October 2002.

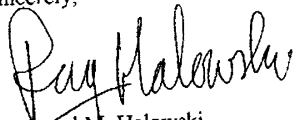
Thank you for addressing all our concerns from our previous correspondence regarding this project.

We have two comments:

- 20 [1. We would like to see porous or pervious concrete in all areas that require paving, not just the ones specified.
- 21 [2. While we understand that you do not favor the use of seawalls now, we adamantly oppose any sea walls or reinforcements of any kind in the future. If a cottage were in danger from ocean or sand erosion, we would like the cottage removed, without any attempt at shoring. The beach and sand are a priority over a misplaced building!

The plan appears to be well thought out and complete. Congratulations on a great job to date.

Sincerely,



Raymond M. Halowski
Steering Committee - Surfrider Foundation Newport Beach Chapter
949.644.7443

California State Parks Response

Responses on Following Pages

CCHP PPUP Public Review Comment Letter

Dec 02 02 04:00p

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P. 1

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(213) 387-5383 fax
www.angeles.sierraclub.org

Please reply to:
3467 Inglewood Blvd.
Los Angeles, CA 90066-1936
(310) 391-7562

December 1, 2002

Department of Parks and Recreation
Southern Service Center
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
Attention: Tina Robinson

Dear Ms. Robinson:

I am herewith transmitting to you comments on the Crystal Cove Historic District Preliminary Preservation and Public Use Plan (PPUP), dated October 2002 and the associated Crystal Cove State Park General Plan Amendment. These comments represent the official position of Sierra Club California and its subordinate entities, the Angeles Chapter and the Chapter's Crystal Cove Task Force.

Comments on the Draft Environmental Impact Report associated with the PPUP are being provided to you separately.

If you have any questions or need any additional information, please contact me at (310) 391-7562 or by e-mail at murray_rosenthal@juno.com.

Sincerely,



Murray Rosenthal



California State Parks Response

#22 The separate letter from the Sierra Club regarding the DEIR arrived after the close of the comment period (December 3, 2002 @ 9:57 PM) and is attached with responses with the three other letters received after the close of comments (December 2, 2002) at the end of this section.

#23 Thank you for your support. The Preliminary General Plan Amendment will be finalized after the Park and Recreation Commission reviews the public comments and responses to those comments. Please see Staff Directed Changes sheet prepared for the Park and Recreation Commission for a summary of the proposed changes or clarifications in the General Plan Amendment.

#24 State Parks conducted two public workshops to incorporate public input into the programs developed in the *PPUP*. Many different and often competing interests were presented, and included greater and lesser numbers of cottages assigned to each of the four programs (CARE program, overnight accommodations, concessions, and park operations). The *PPUP* tries to meet the adaptive use suggestions through a balance of program needs. The general site concepts for the *PPUP* need to allow flexibility, yet protect the resources present and allow public utilization of the site. Proposed site development is intended to preserve the character of the Historic District and also meet the needs of public access and use with minimum disruption. In general, cottage adaptations will be appropriate to each cottage's particular characteristics. No new structures, other than restrooms, are proposed with the Historic District and vehicle activity will be reduced within the core area from the existing levels.

CCHP PPUP Public Review Comment Letter

Response to the
Preliminary Preservation and Public Use Plan (PPUP)
and
Crystal Cove State Park General Plan Amendment
 for the
Crystal Cove Historic District (CCHD)
 Prepared by the Sierra Club Crystal Cove Task Force
 December 2, 2002

1. INTRODUCTION

The Crystal Cove Task Force is an entity of the Angeles Chapter of the Sierra Club. The Task Force was established, first, to oppose the development of a resort concession in the Crystal Cove Historic District (CCHD) of Crystal Cove State Park, and, then, to work to protect the natural and cultural resources of the Historic District and the rest of Crystal Cove State Park.

Since the Department of Parks and Recreation (DPR) withdrew from the concession agreement for the Crystal Cove Historic District and bought out the concessionaire, the Task Force has worked with DPR and other groups and individuals to help develop a suitable plan for the Historic District.

22 [In its capacity as the Sierra Club entity charged with working for the well being of Crystal Cove State Park, the Crystal Cove Task Force has reviewed the preliminary PPUP issued in October 2002 and the associated Crystal Cove State Park General Plan Amendment, and herewith presents its comments on the PPUP and General Plan Amendment. (Our comments on the Draft Environmental Impact Report that accompanies the PPUP and General Plan Amendment are being submitted separately.)

2. FAVORABLE OVERALL RESPONSE TO THE PPUP

23 [On the basis of our review, the Crystal Cove Task Force has concluded that the document is acceptable in its intent and overall design. The Task Force, however, does take issue with various details of the preliminary PPUP, and urges that they be changed before the PPUP and General Plan Amendment are presented to the State Parks Commission.

In general, the Task Force is concerned with:

- 24 [
- a. Numbers of cottages that are used for park operations; park interpretation and culture, arts, resources, and education (CARE) functions; and concessions.
 - b. Proposed excessive development of amenities in the CCHD overall as well as in individual cottages.

California State Parks Response

#25 The overnight rentals are envisioned as a lower cost, rustic resort in the *PPUP*, not a high-end market rate luxury resort. The *PPUP* further commits to dormitory style accommodations for at least 65 beds. The programs outlined in the *PPUP* create specific kinds of land use different from the previous use and also from a luxury resort. Any change in the proposed land uses would require another General Plan Amendment and additional public review.

#26 State Parks respectfully disagrees. Please see response # 24. The preservation of Crystal Cove and its “spirit of place” that the *PPUP* discusses includes many elements. It includes not only the physical features of the cottages, site development, and historic landscape elements but also the human activities that animate and inhabit the site. This acknowledges and continues the evolution of a series of communities that have occurred at Crystal Cove and its history as an inhabited place. Visitors in the present and the past are a mixture of frequent visitors who are familiar with Crystal Cove, and new visitors discovering Crystal Cove for the first time. The concept of a new community offers opportunities that would involve both returning and new visitors and contribute to the preservation and revitalization of Crystal Cove. The new “community” at the Historic District will incorporate overnight groups because the area will be set up to encourage intermingling of the guests. The new “community” will also incorporate a broad range of volunteers representing diverse groups and not create an exclusive use. A non-profit board/foundation/docent group may be formed to assist State Parks in developing and implementing the programs identified in the *PPUP*, however, it is the intent of State Parks to encourage equal access to the Historic District and representative membership from local interest groups in management of the District.

CCHP PPUP Public Review Comment Letter

3. OPERATION OF THE CCHD IN PERPETUITY AS A LOW-COST, LOW-INTENSITY FACILITY

DPR was mired in controversy over its planning for the Crystal Cove Historic District from August 1997, when the *Los Angeles Times* published the first story about the Department's agreement with a concessionaire to develop a resort in the Historic District, through at least April 2001, when the Department completed buying out the concessionaire.

The plan to use a concessionaire originated during a period in which California was in a recession and funds for the restoration and operation of the cottages in the Historic District did not appear to be otherwise available. The concession plan also originated with an administration that had a strong orientation toward using public-private partnerships to undertake the state's business. The buy out of the concessionaire occurred during a period of economic boom. In addition, the state had recently passed a bond act (Proposition 12 in March 2000), which could be drawn upon for the funding necessary to initiate planning for and work on the Historic District.

25

Fiscal circumstances and political administrations do, however, change. As rehabilitation of the CCHD progresses, fiscal difficulties may, once again, tempt a future administration to try to use a public-private partnership to complete the effort, to operate the Historic District, or both. As rehabilitation is completed, it is easily conceivable that a future administration could view a resort as a much more lucrative venture than the more modest operation proposed in the PPUP. Morphing in the future from low-cost overnight accommodations to high-end ones might be as simple as redecorating with fancier accoutrements and introducing a more exclusive operating style.

To help prevent such a distortion of the stated goals of the PPUP, the Crystal Cove Task Force urges that the Crystal Cove State Park General Plan Amendment contain language that would require a new general plan amendment—and the concomitant public discussion it would require—if a future administration were to decide for any reason that operation of CCHD as a resort appears to be necessary and justified.

4. CONCEPT OF COMMUNITY IS FAULTY AND SHOULD BE ABANDONED

26

After the departure of the tenants, the Crystal Cove Historic District is and will remain, absent a new set of tenants, a museum village. Only a few staff members will be permanent residents (see 7, below). Most overnight occupants will be transients limited to brief stays. Day-use will be limited visitors to the Historic District, the beach, and/or the marine environment or to volunteers in a CARE or other program. At best, the concept of community is misleading, suggesting an environment that *cannot* exist without permanent tenants. At worst, it is an invitation to a clique of local volunteers to assume control of activities at the Historic District, to the exclusion of other potential volunteers (a condition that has occurred in other units of the State Park System).

California State Parks Response

#27 Please see the Preliminary *PPUP*, page 34, and the EIR, Sections 1.2 & 3.2 and Figures 1.2 & 3.5. State Parks acknowledges the potential impacts of residents and possible hotel users in the Historic District in the EIR Sections 2.3.8, 4.2.5 and 7.1.3. Because of the potential for visitor drop offs to cause adverse impacts to the visitor experience through vehicular congestion, the *PPUP* endeavors to create a pedestrian friendly environment within the Historic District. Certainly it would add to the “Spirit of Place” to disguise the recent urban development, however, any screening of the recent development would need to be incorporated into the Historic Landscape Management Plan and be compatible with the U.S. Secretary of Interior Standards for Historic Properties. **The “Landscaping and Vegetation Management, Visual Screening” section (page 156) acknowledges the need for visual screening for the blufftop areas of the CCHD. Screening treatments are to be compatible with the Historic Landscape Management Plan.**

#28 Please see Section 4.2.1 of the EIR.

#29 State Parks believes that using cottages for park operations/office space and employee housing is both necessary and a desirable use within the Historic District. The *PPUP* provides a diverse array of programs to meet the needs of the public and our mandate to protect the resources found within Crystal Cove State Park Historic District. Support for these programs and the anticipated increase in visitation to the Historic District requires State Parks to have an on-site presence to adequately address all issues associated with the protection and operation of this unique community. Providing office space for park staff within the Historic District will provide the necessary space for employees plan activities and complete administrative duties while being available to immediately respond to the public’s needs as well to efficiently provide the daily maintenance and protection activities associated with historic preservation.

State Parks is the primary law enforcement, search and rescue and maintenance response agency for Crystal Cove State Park. This responsibility for public safety and historic building maintenance (preservation) is a 24 hour /day operation. At state park units throughout California including Bodie State Historic Park, Columbia State Historic Park and Will Rogers State Historic Park, the Department has for many years effectively provided 24 hour public safety and maintenance response by providing park employee housing within historic facilities. This has allowed the Department to provide appropriate and effective response to after hours incidents such as medical aids, ocean rescues, crimes in progress and urgent maintenance needs without having to fund employee salaries and travel time for after hour shifts. Ranger/staff in-residence programs are also utilized by the National Park Service, the U.S. Forest Service and local regional parks for similar reasons.

#30 Please see responses #24 and #26. Specific responses regarding the ranger residences and interpretive and CARE program are addressed as follows:

CCHP PPUP Public Review Comment Letter

5. PPUP'S VIEW OF ADJACENT DEVELOPMENT IS OVERLY OPTIMISTIC

27 Most of the PPUP ignores the major residential, time-share recreational, and commercial development approaching completion directly across Pacific Coast Highway from the Crystal Cove Historic District. Clearly the development will have a negative impact on the ambience of the Historic District, significantly reducing its feeling of timelessness and isolation.

The PPUP should acknowledge these negative impacts, and should devote attention to reducing the potential impacts of residents and time-share occupants crowding Historic District facilities and damaging the area's natural and cultural resources. Additional attention should also be paid to the possibility of screening the development from the view of visitors to the Historic District. Finally, facilities that are available in the new development should not be duplicated in the Historic District (see 10, below).

6. COTTAGES SHOULD BE REHABILITATED, NOT RESTORED

28 The PPUP is not specific on whether cottages will be rehabilitated or restored or on the degree to which restoration efforts should be pursued. The Crystal Cove Task Force urges that the PPUP contain an explicit statement on this matter, and that to limit costs and speed the process, the statement should call for cottages to be rehabilitated to clean, safe, and stable condition. No attempt should be made to return cottages to the condition of some specific earlier period (e.g., the '30s or the '40s). The cottages have evolved over time to their present state, and generally should be left in that state. Only egregiously inconsistent details should be removed, and then only when such removal does not involve excessive cost.

7. TOO MANY COTTAGES ARE ALLOCATED AS RANGER RESIDENCES AND FOR INTERPRETIVE AND CARE PROGRAMS

29 Use of cottages to house rangers and/or other personnel may be a useful security measure during the transitional period between the end of tenant occupancy and full operation as a public use facility. The Crystal Cove Task Force, however, views such use as unnecessary and undesirable when the later state is achieved. At that time, the five cottages the PPUP reserves for ranger occupancy should be converted to accommodations for overnight visitors. If necessary, security should be provided by periodic foot patrols by rangers and/or other security personnel.

30 Introductory material in the PPUP (p. 11) lists at least eight facilities needed to support interpretive and CARE programs:

- a. Visitor Orientation Center
- b. Archive Center
- c. Docent and Park Interpreter Annex
- d. Outdoor Multi-use Commons

California State Parks Response

The Executive Summary description (p. 11) for the Park Interpretation and Education Program includes a simple listing of recommended facilities. Combinations of facilities or actual locations or cottage designations are made elsewhere in the *PPUP*. This list is not intended to indicate the number of cottages designated for this program. State Parks does not propose to change the *PPUP* in this location.

The Underwater Park Education Center is not mentioned in this section but is mentioned elsewhere in the *PPUP*. The *PPUP* will be changed to reflect the following:

PPUP clarification: Park Interpretation and Education Program, (p. 118-120)

A description of the Underwater Park interpretation description (as paragraph four) will be added to the program description on page 120: *“Crystal Cove’s underwater park is an important feature of the coastline and has special interpretive and educational potential for visitors. An Underwater Park Education Center at the Historic District can realize this unique potential. This proposed facility would involve many aspects including exhibit displays as well as a unique underwater video internet broadcast program. Interim Crystal Cove visitor use locates underwater park programs in ‘The Store’ which is proposed to be the Exhibit Facility. Further program research and development is needed to define future facility needs. It is anticipated that the Underwater Park Education Center should continue to be combined with another interpretive facility such as the Exhibit Facility and/or Visitor Orientation Center.”*

Chart H and Map 5 reflect the *PPUP*’s adaptive use intentions for cottages 42, 43, and 44. The location of these small cottages to the Outdoor Commons area makes them more suitable as support facilities. Due to the proposed programs and anticipated activities and special events for Commons facility, these three cottages would not be good overnight cottages because they would not have any privacy and be exposed to noise and activity. Therefore the following clarification for consistency with the Chart H proposals is made:

PPUP clarification: Park Interpretation and Education Program, (p. 118-120)

Guidelines will be added to the Outdoor Commons Facility for consistency with cottage use designations in Chart H and Map 5 *“Adjacent cottage(s) may serve as support facilities for Outdoor Commons activities and events. This could include (but is not limited to) storage for educational equipment, audio-visual equipment, public address systems, etc.; simple food preparation or serving areas; or offices for program/event preparation.*

Chart H, the Matrix of Proposed Adaptive Uses indicates cottages 42, 43, and 44 as part of item 2c Outdoor Commons area & support facilities but the item description will be clarified for consistency with Chart 2 guidelines. The Matrix also indicates multiple adaptive uses for certain cottages because they offer more varied possibilities or potential than others. This allows for greater flexibility and additional determinations for the most appropriate adaptive cottage uses. The multiple designations may have contributed to double counting on program cottage allotments. No change in cottage use designations is

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- e. Multi-purpose Meeting/Classroom Facility
- f. Park and Community Rotating Exhibit Facility
- g. Crystal Cove House Museum(s)
- h. Underwater Park Education Center

Guidelines in the PPUP (pp.118-127) list the following facilities needed for interpretive and CARE programs:

- a. Visitor Orientation Center
- b. Archive Center / Docent and Park Interpreter Annex (combined)
- c. Outdoor Multi-use Commons (no cottages required)
- d. Multi-purpose Meeting/Classroom Facility
- e. Park and Community Rotating Exhibit Facility
- f. Crystal Cove House Museum (one cottage required)

The Underwater Park Education Center is not mentioned. This enumeration appears to dedicate at least five cottages to interpretive and CARE programs.

30 Chart H (p. 105) gives a somewhat different picture of cottage allocations, combining the Park and Community Rotating Exhibit Facility and the Underwater Park Education Center, but calling for two cottages to be used for House Museums and three cottages to be used for the Outdoor Multi-use Commons and its support facilities. This appears to dedicate 10 cottages to interpretive and CARE programs.

Chart 2 (no page number), also combines the Archive Center and the Docent and Park Interpreter Annex in a single cottage, but does not mention the Underwater Park Education Center. Including two cottages for House Museums, Chart 2 calls for the dedication of seven cottages to interpretive and CARE programs.

Map 5 (no page number) shows only five cottages allocated to interpretive and CARE functions.

Inconsistencies in the PPUP on this matter make it difficult to assess the number of cottages to be dedicated to interpretive and CARE programs. It is essential that these inconsistencies be resolved, and that the numbers of cottages used for these function be reduced to the absolute minimum needed to operate them.

The Crystal Cove Task Force is certainly not opposed to creative and vital interpretive and CARE programs. Such programs can create interest in and involvement with the Historic District and the park. We do not want, however, to see cottages committed to—"locked up" by—marginal programs. As a strategy, the Crystal Cove Task Force suggests starting with a small number of cottages, testing the viability and attractiveness of various interpretive and CARE programs, and adding additional cottages if programs are successful and warrant expansion. A suggested starting point might be four cottages serving as:

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necessary. Please refer to Map 5 or Map 6 of the *PPUP* for estimating cottage allotments for each program.

Item 2c of Chart H, Matrix of Proposed Adaptive Uses will be revised to read “Outdoor commons area & support/ flexible office facilities” description for consistency with Chart 2 (Guidelines to for Interpretation and Education Program).

The Flexible Office Facility in the estimated cottage quantity for the Interpretation and Education Program will be clarified for consistency with Chart H, estimated quantity from 1 to 3.

Corrections will be made for Historic District Adaptive Building Uses that are needed for consistency with Park Interpretation and Education Guidelines, Chart H,, and Chart 2.

Cottage #34 will be changed from from Park Operations to Interpretation and Education use on Map 5, Historic District Adaptive Building Uses.

Cottage #25 is designated as an overnight cottage and cottage #13 as a CCHD research office. Chart H identifies these cottages as a potential house museum alternatives. No change is necessary to existing Map 5 designations for #13 or #25. If project implementation design determines that this is not feasible, these cottages may be suitable as house museums (as an alternative) because of their distinctive qualities.

Phased implementation and CARE facilities priorities will allow State Parks to implement programs over time.

The intent of the first phase implementation will be to establish the basic core visitor serving facilities, initial overnight accommodations, infrastructure, and operations facilities needed to manage the area effectively. Visitor serving facilities should be those that will have the most active use and versatility to accommodate the many different programs and activities proposed by the PPUP.

State Parks generally agrees with your suggested priorities for interpretive and CARE facilities in the first phase implementation project with the exception of a house museum. Although a house museum is a valuable part of the complete PPUP, inclusion of the exhibit facility will be more useful in the first phase because it serves more functions and programs of the PPUP. The Exhibit Facility could not only show certain aspects of what might be included in a future house museum (as one possible rotating exhibit) but also be available for exhibits on past Crystal Cove resources, activities, and inhabitants; special underwater park or tide pool exhibits (if a permanent facility is not available); or be available for other Crystal Cove activities or events. Available first phase facilities in the Village Center will be at a premium for the many proposed PPUP programs and activities so we believe that the Exhibit Facility will be more useful initially than a house museum. The Department’s first phase priorities for interpretive and CARE facilities are:

A. Visitor Orientation Center

- 30
- a. Visitor Orientation Center
 - b. Archive Center / Docent and Park Interpreter Annex (combined)
 - c. Outdoor Multi-use Commons (no cottages required)
 - d. Multi-purpose Meeting/Classroom Facility
 - e. Crystal Cove House Museum (one cottage only)

All other interpretive and CARE programs would be accommodated in one of these cottages until they need and justify their own cottages.

7. COTTAGES USED FOR INDIVIDUAL OVERNIGHT ACCOMMODATIONS SHOULD BE DIVIDED INTO TWO OR MORE UNITS

31 The PPUP indicates that the potential exists for dividing some cottages into several individually rentable accommodations (p. 129). This information is presented, however, as a note, and receives no significant emphasis in the document. The Crystal Cove Task Force believes that this potential can, and should, be fully tapped to realize the maximum possible number of rentable units. This approach will have the additional benefit of reducing house-sized cottages to comfortable overnight spaces, that will accommodate normal-size family groups.

8. OVERNIGHT ACCOMMODATIONS SHOULD HAVE NO OR MINIMAL COOKING FACILITIES

The PPUP proposes three classes of overnight accommodations: individual units with full cooking capabilities; individual units with limited cooking facilities; and group accommodations with shared cooking facilities. The Crystal Cove Task Force urges, instead, that all individual accommodations either (preferably) have no cooking facilities, or (alternately) be equipped with minimal cooking facilities (microwave, small refrigerator, and sink).

32 The former approach (no cooking facilities) is consistent with most hotel and motel accommodations in the United States. The absence of in-unit cooking will eliminate the cost of acquiring and maintaining kitchen equipment, significantly reduce cleanup after guests depart, minimize fire hazards, and reduce the amount of waste water and other waste produced by guests.

The latter approach (minimal cooking facilities) can be expected to reduce the cost of acquiring and maintaining kitchen equipment, reduce cleanup after guests depart, reduce fire hazards, and possibly reduce the amount of waste water and other waste produced by guests.

We would also suggest that group accommodations share a single common cooking area. The use of a common cooking area can be expected to reduce the cost of acquiring and

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- B. Archive Center/Docent & Park Interpreter Annex
- C. Outdoor Multi-use Commons (no cottages)
- D. Multi-purpose Meeting/classroom Facility
- E. Park and Community Rotating Exhibit Facility

This would result in four cottages for Interpretation and CARE facilities in the first phase development. For a complete implementation of the *PPUP*, adding the three cottages (#42, #43, and #44) adjacent to the Commons, add one possible cottage as a house museum (to be determined), and combining the underwater park education center with an existing visitor center or exhibit would bring a potential of about 8 cottages for the Park Interpretation and Education program.

As with all proposed facilities, the *PPUP* allows for reevaluation and flexibility for adjustments within the main use programs and site concepts as needs and circumstances evolve in the future.

#31 Final determination of the ability to divide units will be determined on a case-by-case basis including the access to the unit and structural/historic integrity. Division of the cottages may require special fire-wall partitions which could impact the historic fabric of the cottages. Opportunities to maximize the number of beds will be utilized although some of the accommodations may need to be rustic with shared restroom or kitchen facilities.

#32 State Parks strongly considered the idea of limiting cooking facilities at all of the cottages in the development of the *PPUP*. However, the use of some kitchens with full cooking capabilities would allow park operations and the operator of the overnight accommodations greater options in management of the Historic District. The concepts of reduced cooking facilities and group cooking facilities will be encouraged because in order to reduce costs and cleanup. Additionally, these types of accommodations would contribute to the rustic and community atmosphere envisioned at the Historic District. Accessible accommodations must also be incorporated into the mixture of accommodations available. The proposed café would serve all users. Whether or not cooking facilities remain or need to be added within the Historic District would be reevaluated after implementation by park operations and management.

#33 Most of the kitchens cannot be removed due to potential impacts to the historic fabric of the cottages. However, many of the kitchens may not be fully operational. Cost and resource impacts will be determined during restoration and all work conducted according to the U. S. Secretary of Interior Standards for Historic Properties.

#34 Please see response # 24. In order to reduce the need for overnight guests to enter and leave the Historic District, a café was deemed desirable by many people attending the workshops and by park staff. Although guests will certainly be able to visit the nearby urban amenities, it is the intent of the *PPUP* to offer a different experience that enables

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maintaining kitchen equipment, reduce cleanup, reduce fire hazards, and reduce the amount of waste water and other waste produced by guests.

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Any requirement for additional cooking capabilities for either individual units or group accommodations should be handled by individual guests using their own camping or barbecue equipment in one or more common outdoor cooking/eating areas.

9. OFFICE AND CARE FACILITIES SHOULD BE EQUIPPED WITH RESTROOMS, BUT SHOULD NOT HAVE SHOWERS OR KITCHENS

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In order to provide for the comfort and convenience of staff, volunteers, and visitors, the Crystal Cove Task Force suggests that all office and interpretive facilities in the Historic District have their own rest rooms. The Crystal Cove Task Force urges, however, that except for the Lifeguard Substation, no office or interpretive facility have either a shower or a kitchen. Staff and volunteers can provide themselves snacks and beverages with the aid of microwaves and small refrigerators, which DPR may opt to buy for them. Such usage is consistent with the usual office practice, will reduce the cost of developing the Historic District, and will reduce the output of waste water from the District. (Because of their potential contacts with seawater, lifeguards should have easy access to shower facilities, but the Lifeguard Substation does not need kitchen facilities.)

10. CONCESSION FACILITIES ARE UNNECESSARY AND SHOULD BE ELIMINATED

The PPUP calls for the creation of a café and beach store. The café is described as serving three meals a day to overnight guests and day-use visitors, obviating the need of the former to move their cars or to otherwise interfere with their experiencing the solitude and tranquility of the Historic District.

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The Crystal Cove Task Force suggests that a café offering full meal service to all (or even most) overnight visitors and some day-use visitors is neither practical nor desirable. Such a café would have to be a large facility to offer the proposed level of service, probably larger and more complex than is practical to operate in a cottage, even one of the bigger ones, especially combined with a beach store.

The notion of visitors isolating themselves in the Historic District for the duration of their stay also seems questionable. Crystal Cove Historic District is not in some remote back-country location. It is close to urban centers with high-end shopping and other facilities, and is immediately adjacent to a new and sophisticated shopping facilities including several restaurants. It is likely that, no matter how colorful, relaxing, and involving visitors find the Historic District, they will want to spend at least part of their time exploring nearby urban resources, including restaurants serving many types of foods in a variety of

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the visitor to “get away from it all” and remain within the unique ambiance of the Historic District for their entire stay, if desired.

#35 A non-profit board/foundation/docent organization may be formed to assist State Parks in developing and implementing the programs identified in the *PPUP*, however, it is the intent of State Parks to encourage equal access to the Historic District and representative membership from local interest groups in management of the District. Any new organization will also incorporate a broad range of volunteers representing diverse groups and not create an exclusive use. The intent of State Parks would be to allow for a cooperative organization as opposed to a competitive process. Standard concession policies would be adopted with controls on the concession contract developed by State Parks that may include a five-year time frame. If a short time frame does not attract enough competition from concessionaires (due to cost of concessionaire investment), a longer time frame may be necessary.

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price ranges. For these reasons, the task Force urges that the café be deleted from the PPUP.

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Similarly the beach store is of questionable value. The adjacent shopping area includes a major food market, which is likely to meet most visitors' needs. Any not met can certainly be satisfied in Newport Beach, Laguna Beach, or another of the nearby urban centers. For these reasons, the Crystal Cove Task Force also recommends that the beach store be eliminated from the PPUP.

While most food and other needs can be met in nearby eating and shopping facilities, there may be some specialized needs that can be best met by an on-site facility: beach and ocean oriented supplies. To the extent that items in these classes are not readily available elsewhere, the Task Force suggests that the PPUP call for a small rental and sales facility installed in a part of the garage area.

11. ANY NON-GOVERNMENTAL ORGANIZATION EMPLOYED TO OPERATE CARE PROGRAMS SHOULD BE SELECTED THROUGH OPEN COMPETITION

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The PPUP is not clear on whether a new organization will be responsible for CARE functions or whether that effort will be carried on with the existing cooperating association. If a new, non-state organization is to be retained to support CARE, it should be selected through an open, competitive process. Such an open process will provide DPR—and members of the public—with the best available staffing resources, and will assure that the selection process is free of favoritism. Any such organization's operating agreement with DPR should be for a limited period of time (such as 5 years), and should be subject to review and recompetition at the end the time period.

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