



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
wildlife.ca.gov

October 5, 2026
Sent via email

Hannah Beard, Senior Environmental Scientist
California Department of Transportation, District 8
464 West 4th Street, MS 820
San Bernardino CA 92401
Hannah.Beard@dot.ca.gov

Interstate 10 Wildwood Canyon Road Interchange Project (Project)
Draft Environmental Impact Report (DEIR)
SCH# 2022030637

Dear Hannah Beard:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the California Department of Transportation, District 8 (Caltrans) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Transportation, District 8 (Caltrans)

Objective: The objective of the Project is to construct a new interchange connection on Interstate 10 (I-10) at Wildwood Canyon Road in Yucaipa, California.

Location: The Project is in San Bernardino County and Riverside County on I-10 from east of the Yucaipa Boulevard Interchange at Post Mile (PM) R35.3 to south of the Sandalwood Drive Interchange (PM 39.0). The Project is centered approximately on the Wildwood Safety Roadside Rest Area at coordinates 34.013250, -117.077110. The Project design footprint includes Calimesa Boulevard from the Wildwood Creek intersection (north of Avenue G) to Oak Glen Road, and Wildwood Canyon Road from the Calimesa Boulevard intersection to Nebraska Way.

Timeframe: The construction timeline is not given in the DEIR.

COMMENTS AND RECOMMENDATIONS

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (i.e., biological resources). CDFW offers the comments and recommendations below to assist Caltrans in adequately identifying and mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources. The DEIR has not adequately identified and disclosed the Project's direct, indirect, and cumulative impacts on biological resources or whether those impacts are reduced to less than significant.

CDFW's comments and recommendations on the DEIR are explained in greater detail below and summarized here. CDFW is concerned that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW requests that additional avoidance, minimization, and mitigation measures be added to a revised CEQA document, to avoid or reduce impacts to less than significant.

Existing Environmental Setting

Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that the existing environmental setting has not been adequately analyzed in the DEIR. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the DEIR may provide an incomplete analysis of Project-related environmental impacts. The DEIR lacks a complete assessment of biological resources associated with special-status plants, bats, nesting birds, golden eagle (*Aquila chrysaetos*), least Bell's vireo (*Vireo bellii pusillus*), burrowing owl (*Athene cunicularia*), and Crotch's bumble bee (*Bombus crotchii*). A general biological field survey was performed on April 7, 2022, and January 12, 2023. CDFW generally considers field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. CDFW is also concerned that focused surveys have not been conducted for some species to establish the existing environmental setting for this Project and that some species surveys have been deferred to the time of construction and consist only of pre-construction surveys. The CEQA Guidelines (§ 15088.5) indicate that recirculation is required when insufficient information in the DEIR precludes meaningful review. CDFW recommends that revised and additional mitigation measures and analysis as described in this letter be added to a re-circulated DEIR.

Mitigation Measures

To support Caltrans in ensuring that Project impacts to biological resources are reduced to less than significant, CDFW recommends revising or adding avoidance, minimization, and mitigation measures regarding CDFW's Lake and Streambed Alteration Program, the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP), wildlife connectivity, special-status plants, biological monitoring, introduced plant species and revegetation, restoration, oaks and other trees, bats, nesting birds, golden eagle, least Bell's vireo, Crotch's bumble bee, burrowing owl, artificial lighting, dewatering, and wildlife entrapment.

Pursuant to the CEQA Guidelines, section 15097(f), CDFW has prepared a draft Mitigation Monitoring and Reporting Program (MMRP) in Attachment 1 for revised and proposed measures.

Comment 1: CDFW Lake and Streambed Alteration Program

Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or deposit debris, waste, or other materials that could pass into any river, stream, or lake. Note that "any river, stream, or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and water courses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Section 2.4.2 of the DEIR indicates that streambed resources may be impacted by the Project, including Wildwood Wash and Yucaipa Creek. Table 1.7-1 of the DEIR indicates that coordination to apply for a Section 1602 permit would occur after approval of the final environmental document. Mitigation Measure WET-1 calls for an application for a Section 1602 permit, and for mitigation for permanent impacts to "water of State."

Through the Lake and Streambed Alteration (LSA) Program, CDFW determines if an activity may substantially impact a river, lake, or stream, and this determination is made by CDFW after a notification is submitted. Given the presence of streams on-site that will be impacted by the Project, CDFW recommends that Caltrans notifies CDFW's LSA Program. CDFW is concerned that the DEIR does not allow for CDFW determination of whether Project impacts are temporary or permanent, and the DEIR does not acknowledge that restoration efforts may need to be conditioned within a Lake and Streambed Alteration Agreement issued by CDFW.

To support Caltrans in avoiding or reducing impacts to stream resources to a level of less than significant, CDFW recommends that Caltrans revise WET-1 as below, with additions in ***bold italics*** and removals in ~~strike through~~:

WET-1: (Revised)

The following regulatory approvals shall be obtained prior to commencement of any construction activities within the identified jurisdictional areas: 1) U.S. Army Corp of Engineers Section 404 Nationwide Permit 14; 2) Regional Water Quality Control Board Clean Water Act Section 401 Water Quality Certification or a Waste Discharge Requirements; and 3) ~~California Department of Fish and Wildlife (CDFW) Section 1602 Streambed Alteration Agreement. No compensatory mitigation is proposed for waters of the U.S. As part of the regulatory approval process with CDFW during final design, permanent impacts on water of State will be mitigated at a~~

~~minimum ratio of 2:1 at an approved mitigation bank, applicant-sponsored mitigation area, or on site, in consultation with the resource agencies..~~ **prior to construction and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, OR the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.**

Comment 2: Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP)

CDFW issued Natural Community Conservation Plan Approval and Take Authorization for the WR-MSHCP per Section 2800, et seq., of the California Fish and Game Code on June 22, 2004. The WR-MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Section 3.7.4 of the DEIR states that a portion of the Project area is within the WR-MSHCP Planning Area. Project activities in this portion, however, are described as limited to the installation of construction signs, and that no impacts to biological resources are anticipated. The DEIR concludes that the Project is consistent with the WR-MSHCP. CDFW is concerned that sign installation details are not provided in the DEIR. CDFW recommends that Caltrans disclose the sign installation details in a revised DEIR, particularly within the WR-MSHCP Planning Area. If the installation details involve potential impacts to biological resources, such as from the installation of concrete footings or trenching to connect to electrical sources, coordination with CDFW and the United States Fish and Wildlife Service will be necessary to determine consistency with the WR-MSHCP.

Compliance with approved habitat plans, such as the WR-MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the WR-MSHCP as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the WR-MSHCP please go to:

<https://www.wrc-rca.org/>

Comment 3: Wildlife Connectivity

Section 2.4.1 of the DEIR discusses wildlife connectivity issues. The DEIR concludes that (1) all disturbances of habitat connectivity are temporary, (2) the streams on site are not essential wildlife corridors, and (3) that "wildlife would continue to have access to the large amounts of open space located outside of the Project Design Footprint." However, Table 2.2.5-1 points out that the Project is located near areas of essential habitat connectivity, and Wildwood Creek has been identified as an important wildlife corridor connecting the San Bernardino Mountains to the San Geronio Wilderness. The Terrestrial Connectivity – ACE [ds2734] layer on the Biogeographic Information and Observation System (BIOS) supports the identification of essential habitat connectivity near the Project impact area. Section 3.6.3.5 of the DEIR points out that "the area immediately surrounding the proposed interchange is largely undeveloped land," and that the Project "would support the planned economic development of Yucaipa by providing additional freeway access for future development of this land." CDFW is concerned that the

DEIR does not account for long-term impacts of development on wildlife connectivity.

CDFW recommends that the DEIR analyze the need to design, construct, and maintain terrestrial wildlife crossings to minimize barrier effects and habitat fragmentation created by transportation projects and future land use developments. CDFW recommends that the DEIR analyze existing use of wildlife corridors within the Project area and surrounding areas, to evaluate the extent of future wildlife connectivity impacts of projects supported by the infrastructure created by this Project. The DEIR should also assess opportunities for enhancement of existing corridors or creation of new corridors where they may be lacking. The DEIR should provide detailed maps of specific locations where wildlife connectivity could be impacted, such as culverts, roads, and fencing.

Analysis and Monitoring of Wildlife Corridors

CDFW recommends that this Project incorporate wildlife movement studies to evaluate the potential for the Project to significantly impact wildlife connectivity and to guide the development of wildlife corridor mitigation measures to mitigate for connectivity impacts. Pre-construction study results should be used to develop biologically-feasible movement corridor improvements. Post-construction monitoring should also assess the use of wildlife movement corridors.

The protocol for the baseline survey, post-construction surveys, site selection criteria, and design criteria for the development of the wildlife connectivity structures should, at a minimum, follow the protocols outlined in the Caltrans Wildlife Crossings Design Manual ², CDFW's Transportation Planning Companion Plan associated with the State Wildlife Action Plan ³, and the Federal Highway Administration Wildlife Crossing Structure Handbook.⁴

CDFW recommends that monitoring data be analyzed, summarized, and results discussed in reports that may be posted for the public and submitted to CDFW and other agencies or organizations that have a duty or interest in the effectiveness of wildlife movement corridors.

Infrastructure and Project Component Design

CDFW recommends that on-site features that contribute to habitat connectivity should be evaluated. Aspects of the Project that could create direct or indirect barriers to wildlife movement should be identified and addressed in the DEIR. CDFW recommends the Project avoid encroaching on wildlife corridors, essential connectivity blocks, critical wildlife passage areas, or potential linkage areas.

The DEIR should establish measures for wildlife-friendly designs, including:

- Wildlife-friendly fencing, including restrictions on placement of fencing at culvert openings. Fencing should be designed to deter wildlife from crossing over roads and other infrastructure, to reduce wildlife-vehicle collisions during dry and wet seasons.
- Culvert improvements to support passage during wet and dry periods, including maintaining culverts to be free of constraining sediments and

² California Department of Transportation. 2009. Wildlife crossings design manual. California Department of Transportation, Sacramento, California, USA.

³ California Department of Fish and Wildlife. 2016. California state wildlife action plan, transportation planning companion plan. Prepared by Blue Earth Consultants, LLC., Sacramento, California, USA.

⁴ Federal Highway Administration. 2011. Wildlife crossing structure handbook: Design and Evaluation in North America.

vegetation, terracing to allow culvert passage by terrestrial species during water flows, and upsizing to support passage of larger wildlife.

- Consideration of design features that can support wildlife movement such as minimizing lengths (entry to exit) of dedicated wildlife crossings for certain species guilds; designs (grates, shelving, terracing, etc.) that still allow light penetration; maximizing heights of crossings or adding bridges for larger species guilds; natural cover types to encourage use; bench designs to allow use of the crossings during flooding; and smaller animal escape areas within or adjacent to dedicated wildlife crossings.
- Scientifically-defensible wildlife corridor width should be required. The functional width of usable linkages should be described and maintained outside of the zone of influence of edge effect. In general, a corridor should be at least two kilometers (km) wide, except at unavoidable bottlenecks such as freeway crossing structures. The effective corridor width is the minimum size needed to mitigate negative human influence on animal movement through the corridor.

CDFW recommends coordination with regional CDFW and conservation engineering staff on the design of connectivity mitigation measures including wildlife passage undercrossings, directional fencing to prevent animals from crossing roads, removal of accumulated sediment that may block undercrossings, removal of vegetation debris, control of invasive plant species, signage to alert drivers of wildlife crossings, and education and training on wildlife crossings.

Wildlife movement corridors should continue to be monitored for wildlife passage during all Project phases (construction, operation, reclamation, and revegetation monitoring). Upon completion of Project-related activities, any wildlife connectivity structures should be studied for an additional 12- to 24-month period, at minimum, to determine their effectiveness.

The recommended movement studies should be used to determine locations for design modifications that support the maximum movement and connectivity for impacted species. CDFW recommends thorough monitoring of wildlife crossings both before and after construction to assess their effectiveness. This monitoring should include the use of camera traps, track beds, and other methods.

Mitigation – Local Area Movement Corridors

The DEIR should evaluate the development of advanced mitigation credits to support mitigation for future projects and to address connectivity impacts. Fish and Game Code Section 1955 et seq. (Senate Bill 790) allows the California Department of Fish and Wildlife to approve compensatory mitigation credits for actions that improve wildlife connectivity. These actions should lead to measurable improvements in aquatic or terrestrial habitat connectivity, wildlife migration, recolonization, and breeding opportunities, especially where these are hindered by infrastructure or habitat fragmentation, and may include building road overpasses or underpasses.

The Project may be able to provide additional value for wildlife connectivity depending on its design. Additionally, Caltrans could seek out the development of Mitigation Credit Agreements as part of a Regional Conservation Investment Strategy.

To support Caltrans in avoiding or reducing impacts on wildlife connectivity to a level of less than significant, CDFW recommends that Caltrans adopt the following measure BIO-[A]:

BIO-[A]: Analysis and Monitoring of Wildlife Corridors (New)

To offset impacts associated with construction of a new interchange connection on Interstate 10 (I-10) at Wildwood Canyon Road in Yucaipa, prior to the start of any Project activities, Caltrans shall coordinate with CDFW to assess opportunities for enhancement of existing wildlife corridors and the creation of new corridors where they may be lacking. Caltrans shall coordinate with CDFW regional and conservation engineering staff on the design of connectivity mitigation measures including but not limited to wildlife passage undercrossings, directional fencing to prevent animals from crossing roads, removal of accumulated sediment that may block undercrossings, removal of vegetation debris, control of invasive plant species, signage to alert drivers of wildlife crossings, and education and training on wildlife crossings.

Comment 4: Special-Status Plants

Section 2.4.3.2 of the DEIR reports that Caltrans performed rare plant habitat assessments in the Biological Study Area on April 7, 2022, and January 12, 2023. Those surveys detected habitat for slender-horned spineflower (*Dodecahema leptoceras*), Parry's spineflower (*Chorizanthe parryi* var. *parryi*, 1B.1), and mesa horkelia (*Horkelia cuneata* var. *puberula*, 1B.1). The DEIR reports that Caltrans performed focused botanical surveys on May 3, 2022, and May 17, 2022, to coincide with blooming seasons. The DEIR concludes that special-status plants are absent from the Project area, and does not include any measures regarding further surveys.

Slender-horned spineflower is listed as endangered under CESA. Parry's spineflower and mesa horkelia have a California Rare Plant Rank of 1B.1, which indicates plants that are seriously threatened in California. Impacts to these species must be analyzed during preparation of environmental documents relating to CEQA because they meet the definition of rare or endangered under CEQA Guidelines §15125 (c) and/or §15380.

CDFW appreciates that focused plant surveys were performed in 2022. CDFW is concerned, however, that surveys were performed during severe drought conditions in 2022,⁵ and that the January 2023 survey was likely too early to detect and identify plants after rains in December 2022. The surveys are also more than three years old, and CDFW generally considers biological field assessments for plants to be valid for three years.

Floristic assessments typically involve multiple visits to the Project site at various times of year to detect plants in various blooming seasons. If the presence of special-status plant species is not determined through floristic based surveys, unauthorized take or disturbance of special-status plant species could occur. CDFW recommends that plant surveys be repeated during the appropriate blooming seasons for species identification, and that survey results are shared in a revised DEIR. CDFW recommends that Caltrans adopt BIO-[B] as follows:

BIO-[B]: Special-Status Plants (New)

Prior to Project construction activities, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants>) shall be performed by a

⁵ National Integrated Drought Information System. 2022. California-Nevada Drought Status Update – October 18, 2022. Accessed at: <https://www.drought.gov/drought-status-updates/california-nevada-drought-status-update-10-18-22>.

qualified biologist. Should any state-listed plant species be present in the Project area, the Project proponent shall obtain appropriate CESA or NCCP authorization for those species prior to the start of Project activities. Should other special-status plants or natural communities be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.

Comment 5: Biological Monitoring

Section 3.7.4 of the DEIR calls for a Project Biologist to oversee compliance with protective measures for biological resources, and to conduct site visits at least weekly (BIO-1). CDFW is concerned that measure BIO-1 does not require CDFW approval of the Project Biologist, and does not require the Biologist to be on-site during all potentially-disruptive Project activities.

To support Caltrans in avoiding or reducing the Project's impacts on biological resources to a level of less than significant, CDFW recommends that Caltrans revise BIO-1 as below, with additions in **bold italics** and removals in ~~strike through~~:

BIO-1 Project Biologist. **(Revised)**

Caltrans shall retain a CDFW-approved qualified biologist, botanist, or other biological specialist (Designated Biologist) to be onsite throughout the entirety of the project. Caltrans shall ensure that the Designated Biologists are knowledgeable and experienced in the identification, biology, natural history, collecting, and handling of appropriate species. The Designated Biologists shall conduct pre-activity surveys, present the Worker Environmental Awareness Program, monitor all construction activities subject to Fish and Game Code section 1602 (i.e., ensuring the prescribed access routes and work areas are respected), monitor any active bird nests, perform necessary pre-activity surveys within stream areas and within all sensitive habitats, and ensure impacts to wildlife habitat are minimized. ~~During construction, the City's Resident Engineer or designated contractor will ensure that a qualified biologist (Project Biologist) oversees compliance with protective measures for biological resources during clearing and work activities within and adjacent to areas of native habitat and jurisdictional aquatic resources. The Project Biologist will designate areas that require temporary fencing and monitor construction, monitor activities during critical times such as vegetation removal, monitor the installation and maintenance of Best Management Practices (BMPs) and environmentally sensitive area (ESA) fencing, and ensure that all avoidance and minimization measures are properly followed. The Project Biologist will conduct site visits a minimum of once weekly throughout construction to verify that ESA fencing is intact and required biological resources protections are in place.~~

Comment 6: Introduced Plant Species and Revegetation

Section 3.7.4 of the DEIR calls for the implementation of "Caltrans Standard Special Provision 14-6.05 Invasive Species Control" during any construction work adjacent to native habitats and aquatic resources (BIO-5). Caltrans Standard Special Provision 14-6.05 is a reserved section and is not defined. Section 2.4.6 of the DEIR offers some potential requirements to be included in the provision, such as the reseeded of areas adjacent to native vegetation, avoidance of reseeding with invasive species, and development of a plant reestablishment period. Section 3.3 of the DEIR calls for the Project design to minimize the need for irrigation and nonnative plants and recommends drought-resistant landscaping (GHG-2). Section 3.7 of the DEIR calls for restored impact areas to not support perennial

invasive plant species rated as “high” or “moderate” on the California Invasive Plant Council list (BIO-6).

CDFW is concerned that the DEIR limits its plant species recommendations to areas adjacent to native vegetation, rather than applying to the entire Project footprint. CDFW recommends that Caltrans avoid planting any species on the California Invasive Plant Council list, regardless of ranking (list available here: [The Cal-IPC Inventory – California Invasive Plant Council](#)). CDFW recommends that Caltrans outline a plant establishment period in the DEIR, rather than leave that time period for future determination. (The Calimesa area is likely to require at least five years of monitoring and management for restoration of vegetation.) CDFW appreciates the consideration of drought-resistant landscaping, and recommends the use of native plant species, which are well-adapted to local conditions after establishment.

To support Caltrans in avoiding or reducing the Project's impacts on vegetation communities to a level of less than significant, CDFW recommends that Caltrans revise BIO-5 and GHG-2 as below (BIO-6 is further considered in a separate comment), with additions in **bold italics** and removals in ~~strike through~~:

BIO-5 Invasive Species Control. **(Revised)**

During construction, the City's Resident Engineer or designated contractor will ensure that the introduction and spread of invasive species to and from the job site into sensitive habitat be prevented through the implementation of Caltrans Standard Special Provision 14-6.05 Invasive Species Control during any construction work adjacent to native habitats and aquatic resources. **The Special Provision will prohibit the planting of any species on the California Invasive Plant Council list, and will describe a plant establishment period of at least five years.**

GHG-2 **(Revised)**

During final design (PS&E), the City's Resident Engineer will ensure that project features that minimize the need for irrigation and **exclude** nonnative plants will be incorporated into the Project design. Drought-resistant landscaping will be used where feasible, **with a preference for the use of native plant species in all vegetated areas.**

Comment 7: Restoration

Section 2.4.5.4 of the DEIR calls for restoration of temporarily-impacted areas (BIO-6). The measure describes performance standards that include exhibiting a minimum of 80 percent native cover relative to an unimpacted reference site adjacent to the Project Design Footprint. CDFW is concerned that the use of an adjacent reference site as a performance standard does not account for the potentially low habitat quality of the adjacent site. Measure BIO-6 also does not describe any contingencies in the event that the restoration efforts are not successful. CDFW recommends that the measure include an absolute measure of vegetation cover as a success criterion, identify a timeframe for restoration, and include a contingency for unsuccessful restoration.

To support Caltrans in avoiding or reducing the Project's impacts on vegetation communities to a level of less than significant, CDFW recommends that Caltrans revise BIO-6 as below, with additions in **bold italics** and removals in ~~strike through~~:

BIO-6 Temporary Impact Restoration. **(Revised)**

~~During construction, the City's Resident Engineer or designated contractor~~
Caltrans will ensure that any temporarily impacted areas that contain existing native habitats be restored upon project completion. Restoration will include revegetating the temporarily impacted communities with cuttings, hydroseeding, and/or container stock upon project completion. A Habitat Restoration Plan will be developed that includes restoration implementation guidance, maintenance and monitoring requirements, and performance standards. Performance standards will require that the restored areas not support ~~perennial invasive~~ **any** species ~~(those rated as high or moderate on the California Invasive Pest Council inventory)~~ and exhibit a minimum of 80 percent **absolute cover of native plant species within five years of the completion of construction activities.** ~~cover relative to an unimpacted reference site adjacent to the Project Design Footprint.~~ **If restoration is unsuccessful, Caltrans will coordinate with CDFW to determine appropriate mitigation, which may include the purchase of mitigation banking credits.**

Comment 8: Oaks and Other Trees

Section 2.4.1 of the DEIR reports that up to 0.43 acres of coast live oak woodland would be permanently removed by Project activities and calls for the disclosure of oak tree impacts to the City of Yucaipa (BIO-7). The Aesthetics section of the DEIR (section 3.7) states that up to 95 mature trees would be removed during Project activities. Section 3.7.4 of the DEIR calls for compensatory mitigation for removal of oak trees with a diameter at breast height of over 8 inches, via planting at a ratio of between 3:1 and 6:1 depending on size (BIO-8). The DEIR calls for tree replacement in measure VIS-4, in connection with the Caltrans Rehabilitation Project, but the DEIR does not define that program. The DEIR also calls for a tree protection plan, but limits those protections to native species of a particular size (VIS-5).

CDFW is concerned that the DEIR does not provide an estimate of the sizes of the mature trees to be removed, and does not disclose a species breakdown of the 95 mature trees. CDFW recommends that Caltrans disclose this information in a revised DEIR so that impacts can be accurately analyzed. CDFW also recommends that the analysis of impacts to the coast live oak woodland be included in the "Biological Resources" sections of the DEIR, rather than being confined to the Aesthetics or other sections.

Native oak trees are keystone species that are essential to sustaining biodiversity. CDFW is concerned that the mitigation ratios in BIO-8 are likely too small to mitigate for the losses of mature oak trees, given the difficulty of establishing new trees and the time delay for new trees to grow to maturity. CDFW recommends that Caltrans consult on mitigation ratios for the removal of trees of any size during the Fish and Game Code 1602 notification process. For clarity, CDFW recommends that Caltrans describe the Caltrans Rehabilitation Project and its connection to trees in the Project area in measure VIS-4.

CDFW also recommends that Caltrans revise measure VIS-5 to minimize damage to all trees. Each tree should be considered individually, and non-native trees should be considered because they also provide valuable wildlife habitat (i.e., cover, nesting habitat, and foraging habitat).

To support Caltrans in avoiding or reducing the Project's impacts on oaks and other trees to a level of less than significant, CDFW recommends that Caltrans revise BIO-8, VIS-4, and VIS-5 as below, with additions in **bold italics** and removals in ~~strike through~~:

During and after construction, the City's Resident Engineer will ensure that compensatory mitigation will be implemented to address effects to oak trees (excluding California scrub oaks, ***Quercus dumosa***) consistent with the City's most current adopted resolution for Oak Tree Preservation (Resolution No. 96-03). It is anticipated that mitigation will be implemented to address effects to oak trees (excluding California scrub oaks) with trunk sizes above 8 inches in diameter at breast height (dbh) and will involve replacement on-site at a mitigation-to-effect ratio of 3:1. For heritage oaks (oaks with a greater than 36-inch dbh), it is anticipated that a mitigation-to-effect ratio will be 6:1, ~~if feasible~~. If the replacement trees cannot be planted in the immediate vicinity of where the previous trees were located, they may be planted elsewhere in the Project Design Footprint. Any replacement trees from a nursery must be coast live oak (*Quercus agrifolia*). Other oak tree varieties must be approved in advance by the City of Yucaipa Community Development Department. All relocated or replaced trees will be monitored and maintained by a qualified biologist for five years or until the plants have become fully established and can survive without supplemental irrigation. ***If oak trees of any size are associated with stream resources, CDFW may require additional mitigation in a Streambed Alteration Agreement.***

VIS-4 Landscape Plan. **(Revised)**

During final design, a highway landscape plan shall be prepared that identifies all opportunities to use areas within the State ROW for full landscaping consistent with the Caltrans Highway Design Manual, the Project Development Procedures Manual, the Caltrans District 8 - Interstate 10 Corridor Master Plan, Riverside County, and with guidance and approval by the Caltrans District 8 Landscape Architect. This would include landscaping for graded areas with plant species consistent with adjacent vegetation, and enhancement of new project features to the extent feasible. For reference, the Visual Impact Assessment for I-10 EB TCL Improvement Project, page 24, states: This plan would incorporate all applicable procedures and requirements detailed in the Caltrans Highway Design Manual, Section 902.1, Planting Guidelines (November 2001), and policies of the Yucaipa General Plan (City of Yucaipa 2016) and Municipal Code as applicable. During final design, the Caltrans District 8 Landscape Architect would verify that the design minimizes removal of existing mature trees. If removal of mature trees cannot be avoided, additional landscape improvements would be incorporated into the final design for these areas. In the event that trees from the Caltrans Rehabilitation Project are removed as a result of the project, the trees would be replaced at a ratio, size, and location as determined by the Caltrans District 8 Landscape Architect. ***If trees proposed for removal are associated with stream resources, CDFW may require additional mitigation in a Streambed Alteration Agreement.***

VIS-5 Tree Protection Plan. **(Revised)**

During final design, a Tree Protection Plan will be prepared and implemented to minimize damage to ~~native~~ trees. Trees shall be protected at their drip zone with temporary fencing where feasible. All trees over two inches caliper at six inches from ground shall be identified in the plan. Temporary fencing will be added along the perimeter of the construction area.

Comment 9: Bats

Section 2.4.4 of the DEIR reports that culverts beneath I-10 for Wildwood Wash and Yucaipa Creek provide suitable roosting habitat for bats. The DEIR includes

measures that call for bat surveys (BIO-9) and, if a maternity roost is detected, a bat management plan (BIO-10). CDFW appreciates that BIO-9 calls for surveys at least one maternity season prior to construction. CDFW is concerned, however, that BIO-9 does not require CDFW approval of bat biologists, only calls for avoidance of maternity colonies, does not require checking trees or other suitable habitat for bats, and constrains the need for surveys to a particular season. CDFW is also concerned that BIO-10 calls for a bat management plan only after bats are found, which can result in Project delays as the plan is reviewed and revised. Additionally, the proposed bat plan measures within BIO-10 are not sufficient to avoid impacts to bats.

Bats are protected as nongame mammals under Fish and Game Code section 4150. According to the Western Mastiff Bat Predicted Habitat – California Wildlife Habitat Relationships (CWHR) M042 [ds2501], Silver-Haired Bat Predicted Habitat - CWHR M030 [ds2489], Pallid Bat Predicted Habitat - CWHR M038 [ds2497], Canyon Bat Predicted Habitat - CWHR M031 [ds2490], Brazilian Free-Tailed Bat Predicted Habitat - CWHR M039 [ds2498], Big Brown Bat Predicted Habitat - CWHR M032 [ds2491], and Western Yellow Bat Predicted Habitat - CWHR M035 [ds2494] layers in BIOS, the Project lies within medium- to high-quality habitat for western mastiff bats (*Eumops perotis*), silver-haired bats (*Lasionycteris noctivagans*), pallid bats (*Antrozous pallidus*), canyon bats (*Parastrellus hesperus*), Brazilian free-tailed bats (*Tadarida brasiliensis*), big brown bats (*Eptesicus fuscus*), and western yellow bats (*Lasiurus xanthinus*). Brazilian free-tailed bats can live in culverts, and big brown bats, silver-haired bats, and western yellow bats often roost in trees. Both culverts and trees are in this Project area. CDFW recommends that focused bat surveys are completed and that the results of those surveys are included in a revised DEIR.

To support Caltrans in avoiding or reducing impacts to bats to a level of less than significant, CDFW recommends that BIO-9 and BIO-10 are revised, and that BIO-[C] is adopted as follows, with additions in **bold italics** and removals in ~~strike through~~:

BIO-9 Bat ***Focused and Pre-construction*** Surveys. ***(Revised)***

Prior to ~~the initiation of Project activities~~ construction, the City's Resident Engineer or designated contractor ***Caltrans shall*** will ensure that a ***CDFW-approved*** qualified bat biologist familiar with crevice-dwelling bat species ~~conduct a presence/absence survey of the Interstate 10 culverts for Wildwood Wash and Yucaipa Creek within the Impact Area during the bat maternity season (May 1 through August 31) to assess the potential for use for bat roosting.~~ ***conducts focused surveys to determine presence of daytime, nighttime, wintering (hibernacula), and maternity roost sites. Two spring surveys (April through June) and two winter surveys (November through January) shall be performed by qualified biologists. Surveys shall be conducted during favorable weather conditions only.*** The surveys will be conducted at least one maternity season prior to construction to allow enough time for implementation of temporary exclusion measures if deemed necessary based on the results of the surveys. ~~If signs of bats are present, additional~~ ***Surveys including shall include*** a combination of structure inspections, exit counts, and acoustic surveys ~~will be conducted, to ensure detection of day- and night-roosting bats.~~ ***Each survey shall consist of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat on the Project site. Surveys shall be conducted within one 24-hour period. Visual inspections shall focus on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering). Bat detectors, bat call analysis, and visual observation shall be used during all dusk emergence***

and pre-dawn re-entry surveys. The results of the focused surveys shall be submitted to CDFW prior to commencement of project activities and shall include: 1) the exact location of all roosting sites (mapped), 2) the number of bats present at the time of survey (count or estimate), 3) each species of bat present (include how the species was identified), 4) the location, amount, distribution, and age of all bat guano shall be described and mapped, and 5) the type of roost (day, night, maternity, wintering).

If active maternity roosts are identified in the work area or 1000 feet extending from the work area, Project construction will only occur between October 1 and February 28, outside of the maternity roosting season after young bats are volant (flying). Maternity roosts shall not be evicted, excluded, removed, or disturbed. If active hibernacula are identified in the work area or 1000 feet extending from the work area, a minimum 1000-foot no-work buffer shall be provided around hibernacula. Buffers shall be left in place until the end of Project construction and activities or until the qualified bat biologist determines that the hibernacula are no longer active. Project-related construction and activities shall not occur between 30 minutes before sunset and 30 minutes after sunrise. Hibernacula roosts shall not be evicted, excluded, removed, or disturbed.

The qualified bat biologist will also perform preconstruction surveys ~~or temporary exclusion~~ within two weeks prior to construction **in all work areas plus a 1000-foot survey buffer**, as bat and bird roosts can change seasonally.

BIO-10 Bat Management Plan. **(Revised)**

If there are suitable and/or occupied hibernacula (winter roosts) or maternity roosts of any bat species in the Project area, Caltrans shall submit to CDFW for review and approval a Bat Avoidance and Monitoring Plan (BAMP) prior to initiating Project activities. ~~Prior to construction, if an active bat maternity roost is detected where construction activities would cause disturbance to roosting, the City's Resident Engineer or designated contractor will ensure that a bat management plan be prepared. The bat management plan will be submitted to CDFW prior to implementation.~~ **The BAMP will include Project-specific avoidance and minimization measures to ensure that impacts to bats do not occur. The BAMP shall be created in coordination with, and implemented by, the CDFW-approved bat biologist. The BAMP shall include, at a minimum: monitoring protocols; survey timing and duration; procedures and frequency of direct reporting to CDFW; and Project-specific avoidance and minimization measures that consider but are not necessarily limited to: Project phasing and timing; installation and monitoring of temporary exclusionary materials, where and when appropriate; monitoring of Project-related noise, vibration, and lighting; and installation of buffers.** ~~and will include appropriate avoidance and minimization efforts such as~~

- ~~Daytime Work Hours. All work conducted on or under~~ **within 1000 feet of the Interstate 10 culverts at Yucaipa Creek and Wildwood Wash and other suitable habitat for bats will take place during the day. "Daytime work hours" means that Project-related construction and activities shall not occur between 30 minutes before sunset and 30 minutes after sunrise.** ~~If this is not feasible, lighting and noise will be directed away from night roosting and foraging areas, and bats will be monitored by a CDFW-approved bat biologist during all work. The biologist will have the authority to stop work if bats exhibit signs of disturbance.~~
- ~~Temporary Exclusion. The need for temporary exclusion devices will be determined by a qualified and permitted bat biologist. This biologist will also supervise installation of all temporary exclusion devices. Prior to the~~

~~initiation of construction activities, to avoid indirect disturbance of bats and birds while roosting in areas that would be adjacent to construction activities, any portion of the structure to have potential bat or bird roosting habitat that may be affected during construction will have temporary bat and bird eviction and exclusion devices installed. Eviction and subsequent exclusion will be conducted during the fall (September or October) to avoid trapping flightless young bats inside during the summer months or hibernating/overwintering individuals during the winter. Such exclusion efforts are dependent on weather conditions, take a minimum of two weeks to implement, and must be continued to keep the structures free of bats and birds until the completion of construction. All eviction and/or exclusion techniques will be coordinated between the qualified bat biologist and CDFW if the structure is occupied by bats. If deemed appropriate, the biologist may recommend installation of temporary bat panels during construction.~~

BIO-[C] Avoidance of Bats during Tree Removal. (New)

Tree removal work with the potential to house roosting bats shall be performed after maternity season when young are volant (flying) but before expected onset of torpor (wintering inactivity) to minimize direct impacts to roosting bats (i.e., tree removal could be conducted between approximately September 15 and October 31). Tree removal work may also be conducted following winter torpor and prior to the start of the maternity season (i.e., tree removal could be conducted approximately between February 15 and March 31). No tree removals shall occur during the hibernation season, which typically begins in November or December (depending on weather conditions) and continues through mid-February, due to the high potential for mortality of hibernating bats. All tree removals shall require a two-step removal process and the involvement of a CDFW-approved qualified bat biologist to ensure that no roosting bats are killed during this activity. This two-step removal shall occur over two consecutive days as follows: on Day 1, branches and limbs not containing cavities, as identified by the qualified bat biologist, will be removed. On Day 2, the remainder of the tree may be removed. The disturbance caused by limb removal, followed by an interval of one evening, will allow bats to safely abandon the roost.

Comment 10: Nesting Birds

Suitable habitat for nesting birds occurs in the Project area. Section 2.4.4 of the DEIR calls for nesting bird surveys, but only if vegetation is cleared between February 1 and September 30 (BIO-11). CDFW considers this measure to be inadequate in scope and timing to avoid or reduce impacts to nesting birds to a level of less than significant.

CDFW recommends that Project construction activities are conducted outside of the peak nesting bird season, which is January 15 to September 15. CDFW also recommends the completion of nesting bird surveys regardless of the time of year to ensure that impacts to nesting birds and their nests and eggs are avoided. The timing of the nesting season varies greatly depending on several factors, such as bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). In response to warming, birds have been reported to breed earlier, thereby reducing temperatures that nests are exposed to during breeding and tracking shifts in availability of resources.⁶ CDFW staff have observed that climate change conditions may result in the nesting bird season

⁶ Socolar JB, Epanchin PN, Beissinger SR and Tingley MW (2017). Phenological shifts conserve thermal niches. *Proceedings of the National Academy of Sciences* 114(49): 12976-12981.

occurring earlier and later in the year than historical nesting season dates. CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on site. CDFW therefore recommends the completion of nesting bird surveys regardless of the time of year to ensure compliance with all applicable laws pertaining to nesting and migratory birds.

The DEIR does not include a measure regarding nest monitoring, so CDFW recommends that BIO-11 is revised to account for daily monitoring and for minimum avoidance buffers of 500 feet for raptors and 300 feet for non-raptors.

To support Caltrans in avoiding or reducing impacts to nesting birds to a level of less than significant, CDFW recommends that BIO-11 is revised as follows, with additions in **bold italics** and removals in ~~strike through~~:

BIO-11 Nesting Bird Surveys. **(Revised)**

~~Prior to construction, the City's Resident Engineer or designated contractor~~ **Caltrans** will ensure that impacts on nesting birds be avoided by requiring that any **construction and any ground-disturbing activities, including** ~~native~~ vegetation removal or tree (native or exotic) trimming activities occur outside of the **peak** nesting bird season **(January 15 through September 15)**. ~~In the event that vegetation clearing is necessary during the nesting season (i.e., February 1 through September 30),~~ **Regardless of the time of year, a CDFW-approved** qualified biologist will conduct ~~a preconstruction surveys~~ **no more than three days prior to vegetation removal or ground-disturbing activities, in areas of suitable habitat within the Project limits plus a 500-foot buffer** to identify the locations of nests. **Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts.** Should nesting birds be found **during surveys or during construction**, an exclusionary buffer will be established by the biologist. This buffer should be clearly marked in the field by construction personnel under guidance of the biologist, and construction or clearing will not be conducted within this buffer zone until the biologist determines that the young have fledged or the nest is no longer active. **Nest buffers are species-specific and shall be at least 300 feet for non-raptors and at least 500 feet for raptors. If the qualified biologist determines that Project activities may be causing an adverse reaction, the qualified biologist shall increase the buffers accordingly. All active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.**

Comment 11: Golden Eagle

Section 2.4.4 of the DEIR reports that the Project vicinity contains suitable foraging habitat for golden eagle (*Aquila chrysaetos*), and that a golden eagle was observed foraging nearby in 2022. The DEIR does not include any measures calling for focused surveys for golden eagle.

The Project lies within high-use habitat areas on the Golden Eagle Species Habitat Model (Categorical) RADMAP [ds3323] layer in BIOS, and in high habitat suitability areas on the Golden Eagle Predicted Habitat - CHWR B126 [ds2096] layer in BIOS. CDFW is concerned that the DEIR does not account for indirect impacts to golden eagle that could occur over large distances. CDFW recommends that Caltrans adopt mitigation measure BIO-[F] for golden eagle breeding surveys to avoid impacts to golden eagles.

To support Caltrans in avoiding or reducing impacts to golden eagles to a level of less than significant, CDFW recommends that Caltrans adopt BIO-[D]:

BIO-[D]. Golden Eagle Breeding Surveys. (New)

Prior to Project activities, a CDFW-approved qualified biologist shall conduct focused breeding surveys for golden eagle in all suitable golden eagle habitat within the Project area and surrounding areas where Project activities could adversely affect eagles during the nesting season (December 1 through July 31), following appropriate protocols: Protocol for Golden Eagle Occupancy, Reproduction, and Prey Population Assessment (Driscoll 2010) and the USFWS Interim Golden Eagle Inventory and Monitoring Protocols (2010) or more current guidance from USFWS. If helicopters are used, only one helicopter survey will occur, and additional surveys will be conducted via ground observations. The helicopter must stay 200 meters away from any potential nest sites (i.e., cliffs, treetops, platforms, etc.). If an active nest is discovered, do not stop for more than 5-10 seconds to determine status. If follow-up helicopter surveys are required to get closer to any potential or confirmed nests, Caltrans should contact CDFW about potentially issuing a Memorandum of Understanding (MOU). Results of the eagle surveys shall be provided to CDFW. Data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed. If nesting eagles are detected during the focused surveys, the qualified biologist and Caltrans shall coordinate with CDFW to develop avoidance and minimization measures to be approved by CDFW. If an occupied nest is detected within 2 miles of the Project, Caltrans shall implement a one mile line-of-sight and one-half mile no line-of-sight buffer to ensure that Project construction activities do not result in injury or disturbance to eagles. Triggers for adaptive management shall include any evidence of Project-related disturbance to nesting eagles, including agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site abandonment. Adaptive management actions include cessation of construction activities that are deemed by a qualified biologist to be the source of eagle disturbance. Buffers will be maintained throughout the breeding season or until the young have fledged and are no longer dependent on the nest or parental care for survival.

Comment 12: Least Bell's Vireo

Section 2.4.5 of the DEIR calls for pre-construction surveys for least Bell's vireo within seven days of construction (BIO-15). CDFW is concerned that the mitigation measure is insufficient in timing and scope to avoid or reduce impacts to least Bell's vireo to less than significant. Least Bell's vireo (*Vireo bellii pusillus*) is listed as endangered species under CESA and the federal ESA. The Project is near areas of high habitat suitability for least Bell's vireo, as indicated on the Least Bell's Vireo Predicted Habitat - CWHR B413b [ds3340] layer in BIOS. CDFW recommends that focused surveys for least Bell's vireo are conducted using the US Fish and Wildlife Service protocol (Least Bell's Vireo Survey Guidelines; <https://www.fws.gov/sites/default/files/documents/survey-protocol-for-least-bells-vireo.pdf>). The results of focused surveys should be included in a revised DEIR. CDFW also recommends that Caltrans revise measure BIO-15 to account for survey timelines.

To support Caltrans in avoiding or reducing impacts to least Bell's vireo to a level of less than significant, CDFW recommends that BIO-15 is revised as follows, with additions in ***bold italics*** and removals in ~~strike through~~:

BIO-15 Riparian Bird Protections: ***Focused and Pre-construction Surveys.***
(Revised)

Prior to the start of Project activities, a CDFW-approved Designated Biologist shall complete necessary focused surveys, impact assessments, and associated reports within all locations subject to Project site activities following the protocols provided within the Least Bell's Vireo Survey Guidelines (USFWS, January 2001) to ensure avoidance of impacts. Survey results shall be submitted in writing to CDFW for review prior to the start of Project activities. Caltrans shall not conduct any Project activities within 1000 linear feet of occupied least Bell's vireo habitat from March 1 through September 30.

~~During construction, the City's Resident Engineer or designated contractor~~
Caltrans will ensure that prior to initiation of construction in areas within ~~500~~
1000 feet of suitable southwestern willow flycatcher or least Bell's vireo
foraging ***and nesting*** habitat (mule fat thickets and black willow woodland),
three separate days of pre-construction surveys will be conducted ***by a***
CDFW-approved Designated Biologist within suitable habitat, where
accessible, within 7 days of construction.

Comment 13: Crotch's Bumble Bee

Section 2.4.5 of the DEIR reports that the Project area supports suitable habitat for Crotch's bumble bee (*Bombus crotchii*), mostly in the form of California buckwheat scrub. Protocol focused surveys were not conducted. Crotch's bumble bee is a candidate for listing as an endangered species under CESA. The DEIR acknowledges that if Crotch's bumble bee is found, an Incidental Take Permit pursuant to Section 2081(b) of the California Fish and Game Code would be required prior to commencement of Project activities. The DEIR includes measures calling for surveys (BIO-12), an avoidance plan (BIO-13), and obtaining an Incidental Take Permit (BIO-14).

CDFW appreciates these considerations. CDFW is concerned, however, that the DEIR does not report results of a focused survey. Crotch's bumble bee is likely to be present in the Project area. Recent observations on iNaturalist show Crotch's bumble bee foraging on plants near this section of I-10. Observations are also recorded on the Bumble Bee Observations – California – BBNA [ds3078] layer in BIOS, and the Project is within the species' range on the Crotch's Bumble Bee Range – CDFW [ds3095] layer in BIOS. Crotch's bumble bee primarily nests in late February through late October underground in abandoned small mammal burrows, and may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs. Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil, or under leaf litter or other debris. CDFW recommends that a qualified entomologist conduct a survey for Crotch's bumble bee based on the species' needs. Special focus should be placed on identifying potential nest and overwintering sites as any ground disturbance may lead to take of adults, eggs, or larvae that are in the ground.

CDFW is also concerned that the measures in the DEIR do not require CDFW approval of biologists, the use of the CDFW survey protocol, or CDFW approval of an avoidance plan. In addition, timeframes required for securing an Incidental Take Permit are not mentioned. CDFW recommends that the measures in the DEIR

be revised to address these issues, and that Caltrans plan for several months of coordination if an Incidental Take Permit is needed.

To support Caltrans in avoiding or reducing impacts to Crotch's bumble bee to a level of less than significant, CDFW recommends that BIO-12, BIO-13, and BIO-14 are revised as follows, with additions in **bold italics** and removals in ~~strike through~~:

BIO-12 Crotch's Bumble Bee ***Focused and Pre-Construction*** Surveys.
(Revised)

This measure will only be implemented should Crotch's bumble bee remain a candidate for listing or become a State-listed species prior to construction. Within one year prior to construction, ***vegetation removal, and grading***, ~~the City's Resident Engineer or designated contractor will ensure that a habitat assessment for Crotch's bumble bee be conducted within impact areas and an appropriate survey buffer be established by a qualified biologist with experience surveying for and observing Crotch's bumble bee. If the qualified biologist determines that suitable habitat is present,~~ ***focused*** surveys ***for Crotch's bumble bee shall*** ~~will be conducted by a CDFW-approved qualified entomologist familiar with the species behavior and life history~~ to determine the presence/absence of Crotch's bumble bee. Surveys will be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp, Horning, Jr. and Dunning 1983). ***The surveys shall follow the survey guidelines outlined in CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (2023).*** Survey results, including negative findings, will be submitted to the CDFW prior to implementing project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee. At minimum, a survey report should provide the following: a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee; b) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched; c) Map(s) showing the location of nests/colonies; and, d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

Prior to any ground disturbance, a CDFW-approved qualified entomologist shall conduct a preconstruction survey for Crotch's bumble bee no more than 1 week prior to project activities. The survey shall follow the survey guidelines outlined in CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (2023) and include 100 percent visual coverage and include a minimum 50-foot buffer in adjacent habitat. If a Crotch's bumble bee or bumble bee nest is detected, Caltrans shall halt Project activities and notify CDFW immediately. If impacts to Crotch's bumble bee cannot be avoided, the Project shall be postponed until appropriate CESA authorization is obtained. This may include an incidental take permit (Fish and Game Code, § 2081).

BIO-13 Crotch's Bumble Bee Avoidance. ***(Revised)***

This measure will only be implemented should Crotch's bumble bee remain a candidate for listing or become a State-listed species prior to construction. If Crotch's bumble bee is detected during the Crotch's bumble bee ***focused***

or pre-construction surveys conducted prior to construction **or if detected during construction**, the City's Resident Engineer or designated contractor **Caltrans** will ensure that a plan to fully avoid impacts to Crotch's bumble bee be developed in consultation with a qualified entomologist during final design. The plan shall include effective, specific, enforceable, and feasible measures. An avoidance plan should be submitted to CDFW **for review and approval** prior to implementing project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee. If Crotch's bumble bees are determined to be present and it is determined the species will be impacted, appropriate mitigation will be determined in consultation with CDFW. **If impacts to Crotch's bumble bee cannot be avoided, the Project shall be postponed until appropriate CESA authorization is obtained. This may include an incidental take permit (Fish and Game Code, § 2081).**

BIO-14 Crotch's Bumble Bee Incidental Take Permit. **(Revised)**

This measure will only be implemented should Crotch's bumble bee remain a candidate for listing or become a State-listed species prior to construction. If Crotch's bumble bee is detected during the **Crotch's bumble bee focused or pre-construction** surveys conducted prior to construction **or if detected during construction**, and if impacts to Crotch's bumble bee cannot be feasibly avoided during construction **and ground-disturbing activities and/or vegetation removal** activities, the City's Resident Engineer or designated contractor will ensure that the designated qualified entomologist coordinate with CDFW to obtain appropriate permit for incidental take of **an Incidental Take Permit for** Crotch's bumble bee prior to commencement of construction **and ground-disturbing activities and/or vegetation removal** activities in habitat occupied by Crotch's bumble bee. ~~The incidental take permit would quantify and provide appropriate mitigation for impacts on Crotch's bumble bee habitat. Mitigation for impacts to Crotch's bumble bee habitat would be at a ratio comparable to the level of impact.~~

Comment 14: Burrowing Owl

Section 2.4.5 of the DEIR reports that suitable burrowing owl habitat was identified in the Project impact area in 2022, associated with grasslands and active ground squirrel burrows in large open spaces. Focused surveys for burrowing owl were performed in April 2022 and found no burrowing owls or sign. The DEIR concludes that the species is absent and indicates that Caltrans' Standard Specification requiring 100-foot buffers around owls discovered on-site will be sufficient to avoid impacts to burrowing owl. The DEIR calls for pre-construction surveys for burrowing owl (BIO-16).

CDFW is concerned that focused surveys were only conducted in one month in 2022. The *Staff Report on Burrowing Owl Mitigation*⁷ recommends four surveys timed over the breeding season (at least one site visit between February 15 and April 15, a minimum of three survey visits, at least three weeks apart, between April 15 and July 15, with at least one visit after June 15) to evaluate occupancy by burrowing owl. In addition, given that the April 2022 survey is now more than 4 years old, CDFW is concerned about the potential for burrowing owls to have moved into the Project impact area in the time since the surveys were conducted. Given the presence of ground squirrels on-site, there is also potential for additional

⁷ California Department of Fish and Wildlife (CDFW). 2012. Staff Report on Burrowing Owl Mitigation. State of California, Natural Resources Agency. Available for download at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>.

suitable burrows to have been created, which have not been surveyed. If owls are detected on-site, 100-foot buffers would not be sufficient to avoid impacts.

The Burrowing Owl Range (CWHR B269, ds907) and Burrowing Owl Predicted Habitat (CHWR B269, ds2184) layers in BIOS indicate that suitable habitat for burrowing owls is located throughout the Project area. Because the DEIR lacks the findings of recent focused surveys for burrowing owl following the guidelines in the *Staff Report on Burrowing Owl Mitigation*⁸, or other protocol agreed upon by CDFW, the number and locations of potentially suitable and occupied burrows within the Project site are unknown. Given the lack of results from focused surveys for burrowing owl following recommended or approved protocols and the lack of survey reports, CDFW is limited in its ability to provide biological expertise to support Caltrans in reducing impacts to burrowing owl to a level of less than significant. CDFW recommends that the DEIR is revised to include the results of four recent focused surveys for burrowing owl within all appropriate habitat areas, including survey reports, following the guidelines outlined in Appendix D of the *Staff Report on Burrowing Owl Mitigation*, or other protocol agreed upon by CDFW, and to incorporate appropriate avoidance, minimization, and mitigation measures for burrowing owl. Focused surveys are needed to inform appropriate avoidance, minimization, and mitigation measures and support Caltrans in avoiding or reducing impacts to burrowing owl to a level of less than significant. CDFW requests that if burrowing owls are detected during focused surveys, survey results are submitted to CDFW, and that Caltrans initiate consultation with CDFW to identify a path forward regarding the protection of burrowing owls.

On October 10, 2024, the Fish and Game Commission determined that western burrowing owl warrants protection as a candidate species under the CESA (Fish & G. Code, § 2050 et seq.). During the candidacy period, western burrowing owl will be afforded the same protection as threatened and endangered species under CESA. If Project activities, including relocation, could result in take, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081) or NCCP authorization should be obtained prior to commencement of Project activities.

Take of individual burrowing owls and their nests or eggs is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as “hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill.” Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

To support Caltrans in avoiding or reducing impacts to burrowing owl to a level of less than significant, CDFW recommends that BIO-16 is revised as follows, with additions in ***bold italics*** and removals in ~~strike through~~:

BIO-16 Burrowing Owl ***Focused and*** Pre-Construction Surveys. ***(Revised)***

⁸ California Department of Fish and Wildlife (CDFW). 2012. Staff Report on Burrowing Owl Mitigation. State of California, Natural Resources Agency. Available for download at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>.

Focused burrowing owl surveys shall be conducted on and adjacent to the Project site by a CDFW-approved qualified biologist prior to Project activities, including vegetation removal or ground-disturbing activities. CDFW strongly recommends that focused surveys are conducted in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW immediately, and shall submit the results of focused surveys to CDFW as soon results become available and before commencement of any Project activities, including any vegetation- or ground-disturbing activities. CDFW recommends that the information included in the survey results be consistent with Appendix D of the Staff Report on Burrowing Owl Mitigation, including a detailed map showing locations of all burrowing owls, burrowing owl sign, potential burrows, and occupied burrows (occupied means at least one burrowing owl or its sign has been observed within the last three years; may be indicated by owl sign including feathers, pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site); a description of the behavior of burrowing owls during surveys; a description of survey methods; and other items listed in Appendix D of the Staff Report on Burrowing Owl Mitigation under "Survey Reports." Consultation with CDFW and USFWS must be completed prior to commencement of any Project activities, including vegetation- or ground-disturbing activities. If impacts to occupied burrowing owl habitat or burrow(s) or burrowing owl individuals, nests, or eggs cannot be avoided, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081(b)) should be obtained from CDFW prior to commencement of Project activities, including vegetation- or ground-disturbing activities.

~~Prior to construction, the City's Resident Engineer or designated contractor~~ **Caltrans** will ensure that ~~a preconstruction surveys for burrowing owl be~~ conducted in all suitable habitat areas within 500 feet of the Project Study Area ~~by a qualified biologist within 30 days prior to vegetation clearing/grading~~ **no less than 14 days prior to the start of Project-related activities and again within 24 hours prior to ground disturbance.** **Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a CDFW-approved qualified biologist, and CDFW strongly recommends that preconstruction surveys follow the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation (2012 or most recent version).** ~~If burrowing owl are found within 500 feet of the Project Study Area during the preconstruction survey, the biologist will determine appropriate measures necessary to ensure there is no take of active burrowing owl nests and California Department of Fish and Wildlife conservation requirements with regards to burrowing owl are met.~~ **If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted and the qualified biologist shall coordinate with CDFW and USFWS. Project activities shall not recommence until consultation with CDFW and USFWS is completed.**

Comment 15: Artificial Nighttime Lighting

Section 3.7 of the DEIR reports that the Project would introduce new sources of lighting, potentially impacting wildlife. The DEIR calls for a lighting plan to minimize glare (VIS-2). CDFW is concerned that measure VIS-2 does not address other issues related to artificial nighttime lighting, such as an analysis of direct, indirect, and cumulative impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal or crepuscular wildlife.

The Project's proposed artificial nighttime lighting has the potential to significantly

and adversely affect wildlife in vacant and open space areas adjacent to the Project site, both during construction and via permanent light fixtures. Artificial lighting alters ecological processes including the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation.⁹ Many species use photoperiod cues for communication (e.g., bird song¹⁰), determining when to begin foraging,¹¹ behavioral thermoregulation,¹² and migration.¹³ Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it.¹⁴

CDFW recommends that the DEIR is revised to include an analysis of the direct, indirect, and cumulative impacts of artificial nighttime lighting associated with the Project's construction and operation on biological resources, and appropriate avoidance, minimization, and mitigation measures that will avoid or reduce impacts to less than significant.

To support Caltrans in avoiding or reducing the Project's direct and indirect impacts of artificial nighttime lighting on biological resources to a level of less than significant, CDFW recommends that Caltrans revise VIS-2 as below, with additions in **bold italics** and removals in ~~strike through~~:

VIS-2 Lighting Plan. **(Revised)**

~~During~~ **Throughout Project construction, and in final design of permanent lighting fixtures,** lighting fixtures would be selected to minimize glare on adjacent properties and into the night sky. **Caltrans shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active.** ~~Lighting would be~~ **Caltrans shall ensure that all lighting for the Project is fully** shielded with non-glare hoods and focused within the project ROW, **cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>).** **Caltrans shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.** The lighting plan would be reviewed and approved by the City Resident Engineer and the Caltrans District 8 Landscape Architect prior to construction to ensure compliance with these criteria.

Comment 16: Dewatering

Section 3.7 of the DEIR states that dewatering is not anticipated during Project construction. If dewatering is required, the DEIR calls for any dewatering to comply with Santa Ana Regional Water Quality Control Board requirements (WQ-3). CDFW is concerned that dewatering may also be regulated by CDFW's Lake and

⁹ Gatson, K. J., Bennie, J., Davies, T., Hopkins, J. 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. *Biological Reviews*, 88.4: 912-927.

¹⁰ Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. *The Condor* 108: 130-139.

¹¹ Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* 19: 1123-1127.

¹² Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. *Ecology* 58: 98-108.

¹³ Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. *Frontiers in Ecology and the Environment* 2: 191-198.

¹⁴ Ibid.

Streambed Alteration Program, and this program is not mentioned in WQ-3. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or deposit debris, waste, or other materials that could pass into any river, stream, or lake. In addition, dewatering plans often involve pumps and intakes, which can pose entrapment issues for aquatic and small terrestrial wildlife. To avoid delays in construction, CDFW recommends that Caltrans notify CDFW's Lake and Streambed Alteration Program if dewatering activities are anticipated.

To support Caltrans in avoiding or reducing the Project's direct and indirect impacts of dewatering on biological resources to a level of less than significant, CDFW recommends that Caltrans revise WQ-3 as below, with additions in **bold italics** and removals in ~~strike through~~:

WQ-3 (**Revised**)

If dewatering is required, construction site dewatering must comply with the General Waste Discharge Requirements for Discharges to Surface Waters That Pose an Insignificant (De minimis) Threat to Water Quality (Order No. R8-2015-0004, National Pollutant Discharge Elimination System No. CAG998001) and any subsequent updates to the permit at the time of construction. This Permit addresses temporary dewatering operations during construction. Dewatering BMPs must be used to control sediment and pollutants, and the discharges must comply with the WDRs issued by the Santa Ana Regional Water Quality Control Board. ***If dewatering is required, Caltrans shall notify CDFW's Lake and Streambed Alteration Program to determine if a Lake or Streambed Alteration Agreement is needed.***

Comment 17: Wildlife Entrapment

Section 2.3.2.3 of the DEIR reports that the Project includes the installation of gross solid removal devices, which are devices to capture solid wastes like trash from runoff water. Measure WQ-4 in the DEIR calls for any waste-treatment devices to comply with waste discharge requirements. CDFW is concerned that trash capture devices can entrap wildlife, such as when small animals enter deep vertical pipes, and the pipes have no escape ramps or outlets that those animals can reach. Some styles of net filters can also entrap wildlife. Careful designs can mitigate these risks, but measure WQ-4 does not call for designs to protect wildlife from entrapment. To avoid delays in construction, CDFW recommends that Caltrans design all structures to enable wildlife escape starting early in the design process.

To support Caltrans in avoiding or reducing the Project's direct and indirect impacts on biological resources to a level of less than significant, CDFW recommends that Caltrans revise WQ-4 as below, with additions in **bold italics** and removals in ~~strike through~~:

WQ-4 (**Revised**)

Caltrans-approved treatment BMPs will be implemented by the contractor throughout construction consistent with the requirements of NPDES Permit and Waste Discharge Requirements for the State of California, Department of Transportation, Order WQ 2022-0033-DWQ, NPDES No. CAS000003 and any subsequent permits in effect at the time of construction. Treatment BMPs may include Design Pollution Prevention Infiltration Areas, Infiltration Devices, Biofiltration Strips and Swales, Trash Capture Devices, Detention Devices, Media Filters, Multi-Chamber Treatment Train, Wet Basin, Open Graded Friction Course, and Pervious Pavement. ***Any BMPs with the potential for***

wildlife entrapment (such as deep drop inlets) will incorporate wildlife-protection features such as grate covers and escape ramps.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist Caltrans in identifying and mitigating Project impacts on biological resources. CDFW concludes that the DEIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the DEIR lacks sufficient information for meaningful review of impacts to biological resources, including a complete assessment of biological resources associated with special-status plants, bats, nesting birds, golden eagle, least Bell's vireo, burrowing owl, and Crotch's bumble bee. The CEQA Guidelines (§ 15088.5) indicate that recirculation is required when insufficient information in the DEIR precludes meaningful review. CDFW recommends that revised and additional mitigation measures and analysis as described in this letter be added to a revised DEIR. CDFW also recommends that the DEIR be re-circulated for public review.

Questions regarding this letter or further coordination should be directed to Chris Briggs, Senior Environmental Scientist (Specialist), at 909-758-6774 or

Christopher.Briggs@wildlife.ca.gov.

Sincerely,

DocuSigned by:



84F92FFEEFD24C8...

Kim Freeburn

Environmental Program Manager

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

ec: Heather Brashear, CDFW

Heather.Brashear@Wildlife.ca.gov

Carly Beck, CDFW
Carly.Beck@Wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@lci.ca.gov

ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Mitigation Measures	Timing, Methods	Responsible Parties
WET-1: (Revised) The following regulatory approvals shall be obtained prior to commencement of any construction activities within the identified jurisdictional areas: 1) U.S. Army Corp of Engineers Section 404 Nationwide Permit 14; 2) Regional Water Quality Control Board Clean Water Act Section 401 Water Quality Certification or a Waste Discharge Requirements; and 3) prior to construction and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, OR the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.	See Mitigation Measure	Caltrans
BIO-[A]: Analysis and Monitoring of Wildlife Corridors (New) To offset impacts associated with construction of a new interchange connection on Interstate 10 (I-10) at Wildwood Canyon Road in Yucaipa, prior to the start of any Project activities, Caltrans shall coordinate with CDFW to assess opportunities for enhancement of existing wildlife corridors and the creation of new corridors where they may be lacking. Caltrans shall coordinate with CDFW regional and conservation engineering staff on the design of connectivity mitigation measures including but not limited to wildlife passage undercrossings, directional fencing to prevent animals from crossing roads, removal of accumulated sediment that may block undercrossings, removal of vegetation debris, control of invasive plant species, signage to alert drivers of wildlife crossings, and education and training on wildlife crossings.	See Mitigation Measure	Caltrans
BIO-[B]: Special-Status Plants (New) Prior to Project construction activities, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see https://www.wildlife.ca.gov/Conservation/Plants) shall be performed by a qualified biologist. Should any state-listed plant species be present in the Project area, the Project proponent shall obtain appropriate CESA or NCCP authorization for those species prior to the start of Project activities. Should other special-status plants or natural communities be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.	See Mitigation Measure	Caltrans
BIO-1 Project Biologist. (Revised) Caltrans shall retain a CDFW-approved qualified biologist, botanist, or other biological specialist (Designated Biologist) to be onsite throughout the entirety of the project. Caltrans shall ensure that the Designated Biologists are knowledgeable and experienced in the identification, biology, natural history, collecting, and handling of appropriate species. The Designated Biologists shall conduct pre-activity surveys,	See Mitigation Measure	Caltrans

present the Worker Environmental Awareness Program, monitor all construction activities subject to Fish and Game Code section 1602 (i.e., ensuring the prescribed access routes and work areas are respected), monitor any active bird nests, perform necessary pre-activity surveys within stream areas and within all sensitive habitats, and ensure impacts to wildlife habitat are minimized. The Project Biologist will designate areas that require temporary fencing and monitor construction, monitor activities during critical times such as vegetation removal, monitor the installation and maintenance of Best Management Practices (BMPs) and environmentally sensitive area (ESA) fencing, and ensure that all avoidance and minimization measures are properly followed.		
BIO-5 Invasive Species Control. (Revised) During construction, the City's Resident Engineer or designated contractor will ensure that the introduction and spread of invasive species to and from the job site into sensitive habitat be prevented through the implementation of Caltrans Standard Special Provision 14-6.05 Invasive Species Control during any construction work. The Special Provision will prohibit the planting of any species on the California Invasive Plant Council list, and will describe a plant establishment period of at least five years.	See Mitigation Measure	Caltrans
GHG-2 (Revised) During final design (PS&E), the City's Resident Engineer will ensure that project features that minimize the need for irrigation and exclude nonnative plants will be incorporated into the Project design. Drought-resistant landscaping will be used where feasible, with a preference for the use of native plant species in all vegetated areas.	See Mitigation Measure	Caltrans
BIO-6 Temporary Impact Restoration. (Revised) Caltrans will ensure that any temporarily impacted areas that contain existing native habitats be restored upon project completion. Restoration will include revegetating the temporarily impacted communities with cuttings, hydroseeding, and/or container stock upon project completion. A Habitat Restoration Plan will be developed that includes restoration implementation guidance, maintenance and monitoring requirements, and performance standards. Performance standards will require that the restored areas not support any species on the California Invasive Pest Council inventory and exhibit a minimum of 80 percent absolute cover of native plant species within five years of the completion of construction activities. If restoration is unsuccessful, Caltrans will coordinate with CDFW to determine appropriate mitigation, which may include the purchase of mitigation banking credits.	See Mitigation Measure	Caltrans
BIO-8 Oak Tree Replacement. (Revised) During and after construction, the City's Resident Engineer will ensure that compensatory mitigation will be implemented to address effects to oak trees (excluding California scrub oaks, <i>Quercus dumosa</i>) consistent with the City's most current adopted resolution for Oak Tree Preservation (Resolution No. 96-03). It is anticipated that mitigation will be implemented to address effects to oak trees (excluding California scrub oaks) with trunk sizes above 8 inches in diameter at breast height (dbh) and will involve replacement on-site at a mitigation-to-effect ratio of 3:1. For heritage oaks (oaks with a greater than 36-inch dbh), it is anticipated that a mitigation-to-effect ratio will be 6:1, if feasible. If the replacement trees cannot be planted in the immediate vicinity of where the previous trees were located, they may be planted elsewhere in the Project Design Footprint. Any replacement trees from a nursery must be coast live oak (<i>Quercus agrifolia</i>). Other oak tree varieties must be approved in advance by the City of Yucaipa Community Development Department. All relocated or replaced trees will be monitored and maintained by a qualified biologist for five years or until the plants have become fully established and can survive without supplemental irrigation. If oak trees of any size are associated	See Mitigation Measure	Caltrans

with stream resources, CDFW may require additional mitigation in a Streambed Alteration Agreement.		
VIS-4 Landscape Plan. (Revised) During final design, a highway landscape plan shall be prepared that identifies all opportunities to use areas within the State ROW for full landscaping consistent with the Caltrans Highway Design Manual, the Project Development Procedures Manual, the Caltrans District 8 - Interstate 10 Corridor Master Plan, Riverside County, and with guidance and approval by the Caltrans District 8 Landscape Architect. This would include landscaping for graded areas with plant species consistent with adjacent vegetation, and enhancement of new project features to the extent feasible. For reference, the Visual Impact Assessment for 1-10 EB TCL Improvement Project, page 24, states: This plan would incorporate all applicable procedures and requirements detailed in the Caltrans Highway Design Manual, Section 902.1, Planting Guidelines (November 2001), and policies of the Yucaipa General Plan (City of Yucaipa 2016) and Municipal Code as applicable. During final design, the Caltrans District 8 Landscape Architect would verify that the design minimizes removal of existing mature trees. If removal of mature trees cannot be avoided, additional landscape improvements would be incorporated into the final design for these areas. In the event that trees from the Caltrans Rehabilitation Project are removed as a result of the project, the trees would be replaced at a ratio, size, and location as determined by the Caltrans District 8 Landscape Architect. If trees proposed for removal are associated with stream resources, CDFW may require additional mitigation in a Streambed Alteration Agreement.	See Mitigation Measure	Caltrans
VIS-5 Tree Protection Plan. (Revised) During final design, a Tree Protection Plan will be prepared and implemented to minimize damage to trees. Trees shall be protected at their drip zone with temporary fencing where feasible. All trees over two inches caliper at six inches from ground shall be identified in the plan. Temporary fencing will be added along the perimeter of the construction area.	See Mitigation Measure	Caltrans
BIO-9 Bat Focused and Pre-construction Surveys. (Revised) Prior to the initiation of Project activities, Caltrans will ensure that a CDFW-approved qualified bat biologist familiar with crevice-dwelling bat species conducts focused surveys to determine presence of daytime, nighttime, wintering (hibernacula), and maternity roost sites. Two spring surveys (April through June) and two winter surveys (November through January) shall be performed by qualified biologists. Surveys shall be conducted during favorable weather conditions only. The surveys will be conducted at least one maternity season prior to construction to allow enough time for implementation of temporary exclusion measures if deemed necessary based on the results of the surveys. Surveys shall include a combination of structure inspections, exit counts, and acoustic surveys, to ensure detection of day- and night-roosting bats. Each survey shall consist of one dusk emergence survey (start one hour before sunset and last for three hours), followed by one pre-dawn re-entry survey (start one hour before sunrise and last for two hours), and one daytime visual inspection of all potential roosting habitat on the Project site. Surveys shall be conducted within one 24-hour period. Visual inspections shall focus on the identification of bat sign (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks and bats squeaking and chattering). Bat detectors, bat call analysis, and visual observation shall be used during all dusk emergence and pre-dawn re-entry surveys. The results of the focused surveys shall be submitted to CDFW prior to commencement of project activities and shall include: 1) the exact location of all roosting sites (mapped), 2) the number of bats present at the time of survey (count or estimate), 3) each species of bat present (include how the	See Mitigation Measure	Caltrans

species was identified), 4) the location, amount, distribution, and age of all bat guano shall be described and mapped, and 5) the type of roost (day, night, maternity, wintering). If active maternity roosts are identified in the work area or 1000 feet extending from the work area, Project construction will only occur between October 1 and February 28, outside of the maternity roosting season after young bats are volant (flying). Maternity roosts shall not be evicted, excluded, removed, or disturbed. If active hibernacula are identified in the work area or 1000 feet extending from the work area, a minimum 1000-foot no-work buffer shall be provided around hibernacula. Buffers shall be left in place until the end of Project construction and activities or until the qualified bat biologist determines that the hibernacula are no longer active. Project-related construction and activities shall not occur between 30 minutes before sunset and 30 minutes after sunrise. Hibernacula roosts shall not be evicted, excluded, removed, or disturbed. The qualified bat biologist will also perform preconstruction surveys within two weeks prior to construction in all work areas plus a 1000-foot survey buffer, as bat roosts can change seasonally.		
BIO-10 Bat Management Plan. (Revised) If there are suitable and/or occupied hibernacula (winter roosts) or maternity roosts of any bat species in the Project area, Caltrans shall submit to CDFW for review and approval a Bat Avoidance and Monitoring Plan (BAMP) prior to initiating Project activities. . The BAMP will include Project-specific avoidance and minimization measures to ensure that impacts to bats do not occur. The BAMP shall be created in coordination with, and implemented by, the CDFW-approved bat biologist. The BAMP shall include, at a minimum: monitoring protocols; survey timing and duration; procedures and frequency of direct reporting to CDFW; and Project-specific avoidance and minimization measures that consider but are not necessarily limited to: Project phasing and timing; installation and monitoring of temporary exclusionary materials, where and when appropriate; monitoring of Project-related noise, vibration, and lighting; and installation of buffers. • Daytime Work Hours. All work conducted within 1000 feet of the Interstate 10 culverts at Yucaipa Creek and Wildwood Wash and other suitable habitat for bats will take place during the day. "Daytime work hours" means that Project-related construction and activities shall not occur between 30 minutes before sunset and 30 minutes after sunrise. If this is not feasible, lighting and noise will be directed away from night roosting and foraging areas, and bats will be monitored by a CDFW-approved bat biologist during all work. The biologist will have the authority to stop work if bats exhibit signs of disturbance. •	See Mitigation Measure	Caltrans
BIO-[C] Avoidance of Bats during Tree Removal. (New) Tree removal work with the potential to house roosting bats shall be performed after maternity season when young are volant (flying) but before expected onset of torpor (wintering inactivity) to minimize direct impacts to roosting bats (i.e., tree removal could be conducted between approximately September 15 and October 31). Tree removal work may also be conducted following winter torpor and prior to the start of the maternity season (i.e., tree removal could be conducted approximately between February 15 and March 31). No tree removals shall occur during the hibernation season, which typically begins in November or December (depending on weather conditions) and continues through mid-February, due to the high potential for mortality of hibernating bats. All tree removals shall require a two-step removal process and the	See Mitigation Measure	Caltrans

involvement of a CDFW-approved qualified bat biologist to ensure that no roosting bats are killed during this activity. This two-step removal shall occur over two consecutive days as follows: on Day 1, branches and limbs not containing cavities, as identified by the qualified bat biologist, will be removed. On Day 2, the remainder of the tree may be removed. The disturbance caused by limb removal, followed by an interval of one evening, will allow bats to safely abandon the roost.		
BIO-11 Nesting Bird Surveys. (Revised) Caltrans will ensure that impacts on nesting birds be avoided by requiring that any construction and any ground-disturbing activities, including native vegetation removal or tree (native or exotic) trimming activities occur outside of the peak nesting bird season (January 15 through September 15). Regardless of the time of year, a CDFW-approved qualified biologist will conduct a preconstruction surveys no more than three days prior to vegetation removal or ground-disturbing activities, in areas of suitable habitat within the Project limits plus a 500-foot buffer to identify the locations of nests. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. Should nesting birds be found during surveys or during construction, an exclusionary buffer will be established by the biologist. This buffer should be clearly marked in the field by construction personnel under guidance of the biologist, and construction or clearing will not be conducted within this buffer zone until the biologist determines that the young have fledged or the nest is no longer active. Nest buffers are species-specific and shall be at least 300 feet for non-raptors and at least 500 feet for raptors. If the qualified biologist determines that Project activities may be causing an adverse reaction, the qualified biologist shall increase the buffers accordingly. All active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.	See Mitigation Measure	Caltrans
BIO-[D]. Golden Eagle Breeding Surveys. (New) Prior to Project activities, a CDFW-approved qualified biologist shall conduct focused breeding surveys for golden eagle in all suitable golden eagle habitat within the Project area and surrounding areas where Project activities could adversely affect eagles during the nesting season (December 1 through July 31), following appropriate protocols: Protocol for Golden Eagle Occupancy, Reproduction, and Prey Population Assessment (Driscoll 2010) and the USFWS Interim Golden Eagle Inventory and Monitoring Protocols (2010) or more current guidance from USFWS. If helicopters are used, only one helicopter survey will occur, and additional surveys will be conducted via ground observations. The helicopter must stay 200 meters away from any potential nest sites (i.e., cliffs, treetops, platforms, etc.). If an active nest is discovered, do not stop for more than 5-10 seconds to determine status. If follow-up helicopter surveys are required to get closer to any potential or confirmed nests, Caltrans should contact CDFW about potentially issuing a Memorandum of Understanding (MOU). Results of the eagle surveys shall be provided to CDFW. Data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed. If nesting eagles are detected during the focused surveys, the qualified biologist and Caltrans shall coordinate with CDFW to develop avoidance and minimization measures to be approved by CDFW. If an occupied nest is detected within 2 miles of the	See Mitigation Measure	Caltrans

Project, Caltrans shall implement a one mile line-of-sight and one-half mile no line-of-sight buffer to ensure that Project construction activities do not result in injury or disturbance to eagles. Triggers for adaptive management shall include any evidence of Project-related disturbance to nesting eagles, including agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site abandonment. Adaptive management actions include cessation of construction activities that are deemed by a qualified biologist to be the source of eagle disturbance. Buffers will be maintained throughout the breeding season or until the young have fledged and are no longer dependent on the nest or parental care for survival.		
BIO-15 Riparian Bird Protections: Focused and Pre-construction Surveys. (Revised) Prior to the start of Project activities, a CDFW-approved Designated Biologist shall complete necessary focused surveys, impact assessments, and associated reports within all locations subject to Project site activities following the protocols provided within the Least Bell's Vireo Survey Guidelines (USFWS, January 2001) to ensure avoidance of impacts. Survey results shall be submitted in writing to CDFW for review prior to the start of Project activities. Caltrans shall not conduct any Project activities within 1000 linear feet of occupied least Bell's vireo habitat from March 1 through September 30. Caltrans will ensure that prior to initiation of construction in areas within 1000 feet of suitable southwestern willow flycatcher or least Bell's vireo foraging and nesting habitat (mule fat thickets and black willow woodland), three separate days of pre-construction surveys will be conducted by a CDFW-approved Designated Biologist within suitable habitat, where accessible, within 7 days of construction.	See Mitigation Measure	Caltrans
BIO-12 Crotch's Bumble Bee Focused and Pre-construction Surveys. (Revised) This measure will only be implemented should Crotch's bumble bee remain a candidate for listing or become a State-listed species prior to construction. Within one year prior to construction, vegetation removal, and grading, focused surveys for Crotch's bumble bee shall be conducted by a CDFW-approved qualified entomologist familiar with the species behavior and life history to determine the presence/absence of Crotch's bumble bee. Surveys will be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorp, Horning, Jr. and Dunning 1983). The surveys shall follow the survey guidelines outlined in CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (2023). Survey results, including negative findings, will be submitted to the CDFW prior to implementing project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee. At minimum, a survey report should provide the following: a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee; b) Field survey conditions that should include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched; c) Map(s) showing the location of nests/colonies; and, d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).	See Mitigation Measure	Caltrans

Prior to any ground disturbance, a CDFW-approved qualified entomologist shall conduct a preconstruction survey for Crotch's bumble bee no more than 1 week prior to project activities. The survey shall follow the survey guidelines outlined in CDFW's Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (2023) and include 100 percent visual coverage and include a minimum 50-foot buffer in adjacent habitat. If a Crotch's bumble bee or bumble bee nest is detected, Caltrans shall halt Project activities and notify CDFW immediately. If impacts to Crotch's bumble bee cannot be avoided, the Project shall be postponed until appropriate CESA authorization is obtained. This may include an incidental take permit (Fish and Game Code, § 2081).		
BIO-13 Crotch's Bumble Bee Avoidance. (Revised) This measure will only be implemented should Crotch's bumble bee remain a candidate for listing or become a State-listed species prior to construction. If Crotch's bumble bee is detected during the Crotch's bumble bee focused or pre-construction surveys or if detected during construction, Caltrans will ensure that a plan to fully avoid impacts to Crotch's bumble bee be developed in consultation with a qualified entomologist during final design. The plan shall include effective, specific, enforceable, and feasible measures. An avoidance plan should be submitted to CDFW for review and approval prior to implementing project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee. If Crotch's bumble bees are determined to be present and it is determined the species will be impacted, appropriate mitigation will be determined in consultation with CDFW. If impacts to Crotch's bumble bee cannot be avoided, the Project shall be postponed until appropriate CESA authorization is obtained. This may include an incidental take permit (Fish and Game Code, § 2081).	See Mitigation Measure	Caltrans
BIO-14 Crotch's Bumble Bee Incidental Take Permit. (Revised) This measure will only be implemented should Crotch's bumble bee remain a candidate for listing or become a State-listed species prior to construction. If Crotch's bumble bee is detected during the Crotch's bumble bee focused or pre-construction surveys conducted prior to construction or if detected during construction, and if impacts to Crotch's bumble bee cannot be feasibly avoided during construction and ground-disturbing activities and/or vegetation removal activities, the City's Resident Engineer or designated contractor will ensure that the designated qualified entomologist coordinate with CDFW to obtain an Incidental Take Permit for Crotch's bumble bee prior to commencement of construction and ground-disturbing activities and/or vegetation removal activities in habitat occupied by Crotch's bumble bee.	See Mitigation Measure	Caltrans
BIO-16 Burrowing Owl Focused and Pre-Construction Surveys. (Revised) Focused burrowing owl surveys shall be conducted on and adjacent to the Project site by a CDFW-approved qualified biologist prior to Project activities, including vegetation removal or ground-disturbing activities. CDFW strongly recommends that focused surveys are conducted in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall begin coordination with CDFW immediately, and shall submit the results of focused surveys to CDFW as soon results become available and before commencement of any Project activities, including any vegetation- or ground-disturbing activities. CDFW recommends that the information included in the survey results be consistent with Appendix D of the Staff Report on Burrowing Owl Mitigation, including a detailed map showing locations of all burrowing owls,	See Mitigation Measure	Caltrans

burrowing owl sign, potential burrows, and occupied burrows (occupied means at least one burrowing owl or its sign has been observed within the last three years; may be indicated by owl sign including feathers, pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site); a description of the behavior of burrowing owls during surveys; a description of survey methods; and other items listed in Appendix D of the Staff Report on Burrowing Owl Mitigation under "Survey Reports." Consultation with CDFW and USFWS must be completed prior to commencement of any Project activities, including vegetation- or ground-disturbing activities. If impacts to occupied burrowing owl habitat or burrow(s) or burrowing owl individuals, nests, or eggs cannot be avoided, appropriate CESA authorization (i.e., Incidental Take Permit under Fish and Game Code section 2081 (b)) should be obtained from CDFW prior to commencement of Project activities, including vegetation- or ground-disturbing activities. Prior to construction, Caltrans will ensure that preconstruction surveys for burrowing owl be conducted in all suitable habitat areas within 500 feet of the Project Study Area no less than 14 days prior to the start of Project-related activities and again within 24 hours prior to ground disturbance. Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a CDFW-approved qualified biologist, and CDFW strongly recommends that preconstruction surveys follow the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation (2012 or most recent version. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted and the qualified biologist shall coordinate with CDFW and USFWS. Project activities shall not recommence until consultation with CDFW and USFWS is completed.		
VIS-2 Lighting Plan. (Revised) Throughout Project construction, and in final design of permanent lighting fixtures, lighting fixtures would be selected to minimize glare on adjacent properties and into the night sky. Caltrans shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. Caltrans shall ensure that all lighting for the Project is fully shielded with non-glare hoods and focused within the project ROW, cast downward and directed away from surrounding open-space and agricultural areas, reduced in intensity to the greatest extent possible, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). Caltrans shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler. The lighting plan would be reviewed and approved by the City Resident Engineer and the Caltrans District 8 Landscape Architect prior to construction to ensure compliance with these criteria.	See Mitigation Measure	Caltrans
WQ-3 (Revised) If dewatering is required, construction site dewatering must comply with the General Waste Discharge Requirements for Discharges to Surface Waters That Pose an Insignificant (De minimis) Threat to Water Quality (Order No. R8-2015-0004, National Pollutant Discharge Elimination System No. CAG998001) and any subsequent updates to the permit at the time of construction. This Permit addresses temporary dewatering operations during construction. Dewatering BMPs must be used to control sediment and pollutants, and the discharges must comply with the WDRs issued by the Santa Ana Regional Water Quality Control Board. If dewatering is required, Caltrans shall notify CDFW's Lake and Streambed	See Mitigation Measure	Caltrans

Alteration Program to determine if a Lake or Streambed Alteration Agreement is needed.		
WQ-4 (Revised) Caltrans-approved treatment BMPs will be implemented by the contractor throughout construction consistent with the requirements of NPDES Permit and Waste Discharge Requirements for the State of California, Department of Transportation, Order WQ 2022-0033-DWQ, NPDES No. CAS000003 and any subsequent permits in effect at the time of construction. Treatment BMPs may include Design Pollution Prevention Infiltration Areas, Infiltration Devices, Biofiltration Strips and Swales, Trash Capture Devices, Detention Devices, Media Filters, Multi-Chamber Treatment Train, Wet Basin, Open Graded Friction Course, and Pervious Pavement. Any BMPs with the potential for wildlife entrapment (such as deep drop inlets) will incorporate wildlife-protection features such as grate covers and escape ramps.	See Mitigation Measure	Caltrans