



City of Holtville

Final Initial Study/ Mitigated Negative Declaration

April 2025

- 1. Project Title:** The Alamo River Trail Trestle Bridge
- 2. Lead Agency:** **City of Holtville**
Name, Address 121 W. Fifth Street
& Phone Holtville, CA 92250
Contact: George Galvan, AICP
(760) 337-3883
igalvan@theholtgroup.net
- 3. Project Sponsor:** **City of Holtville**
Name, Address 121 W. Fifth Street
& Phone Holtville, CA 92250
Contact: George Galvan, AICP
(760) 337-3883
- 4. Project Location:** The proposed project site is located within a 5.91-acre parcel, Assessor's Parcel Number (APN) 045-243-005, at the southwest corner of the City of Holtville within the incorporated city limits and above the Alamo River (**Please see Exhibit A – Regional Location Map and Exhibit B – Project Vicinity Map**).
Map Attached
- 5. Project Description:** The Alamo River Trail Trestle Bridge was constructed around circa 1904 with a length of about 350 feet, is an open deck bridge consisting of several short spans and is supported by a system of splayed vertical structural elements. A particular feature of this trestle is the apparent composite of both a timber bent system at both ends and a steel space truss system in the middle. The steel truss occupies the mid one-third of the length of the trestle and is bolted with rivet type connections. The steel rails have long been removed by A & K Railroad Materials for salvage use. As such, the remaining transverse timber beams, spaced at about 2 to 3 feet on center, form the current main top surface of the deck. These transverse beams are about 7-1/2 inch wide by 9-1/2 inch deep over the longitudinal wood girders and increase to 9-1/2 by 16 inches over the top chords of the steel truss. On each end of the transverse beams, a 3-foot-wide metal grating sidewalk supported by double cantilevered wood rafters provides access and adds to the total width of the trestle top deck. A set of 3'-6" tall vertical metal angles at about 3' on center are bolted to the tips of the double cantilevers to form a handrail system with horizontal cables. In August of 2009 a fire occurred in the vicinity of the trestle bridge which resulted in significant damage. A 2010 visual review of the trestle bridge found that the deck, support cross beams, grating, railings, and bents were completely damaged and in need of full replacement.

The trestle bridge repair will result in the replacement of the damaged structural bent timbers, structural cross beams, and other structural components. More specifically, the rehabilitation will consist of the demolition and replacement of the damaged portions of the bridge (approximately 1,000 square feet), and the

installation of 3,500 square feet of bridge decking suitable for non-motorized trail users, 350 linear feet of Americans with Disabilities Act (ADA) compliant bridge railings suitable for pedestrians and bicycles, and 350 square feet of bridge landing suitable for the transition between the bridge and the existing Alamo River Trail. The damaged structures will be replaced with timber, when feasible, to match the nondamaged portion of the bridge and restore the aesthetic appeal of the bridge. Of the eighteen (18) bents that act as key support systems and hold up the bridge deck between spans, only one bent located on the river bank approximately twenty-six (26) feet west of the river bed will be replaced. No work will be conducted on the river bed. The improvements will result in the repair and conversion of the existing trestle bridge into a multimodal pathway suitable for non-motorized users including pedestrians, bicycles and equestrian traffic.

The project will also include improvements to the existing Alamo River Trail aimed at extending the trail to connect to the trestle bridge walkway. The trail improvements will consist of an 8-foot wide, 12 inch deep, class 2 base trail continuation section from the east edge of the Alamo River Bridge to the existing 8-foot-wide plain cement concrete trail. Additional improvements include trail side amenities consisting of 45,000 square feet of mulch, fifteen (15) trees from fifteen (15) gallon containers, thirty-five (35) each of bushes, shrubs, and grasses, six (6) benches, two (2) informational kiosks, four (4) "No Motor Vehicles" signs, and one (1) funding acknowledgement sign. All proposed landscaping will comply with the State Model Water Efficient Landscape Ordinance (MWELO) and have its own irrigation consisting of drip fittings and tree bubblers.

6. General Plan Designation:

City Existing: Open Space

Proposed: No Change

The proposed project will further program number 6 of the Circulation Element of the 2017 General Plan which consists of developing a pedestrian and bicycle network with the goal of connecting public, residential, and business areas within the City of Holtville.

7. Zoning:

City Existing: Open Space

Proposed: No Change

The proposed project will further the intent of Open Space zones which is to provide open spaces for the preservation of natural resources, managed production of resources, outdoor recreation, the protection of public health and safety, and the preservation of natural scenic areas for the existing and future population.

8. Surrounding Land Uses and Setting:

The properties bordering the north and west boundaries of the project site are undeveloped while to the south and east boundary lie State Highway 115 managed by the California Department of Transportation. Project activities will not encroach into neighboring properties and will remain within the project site.

9. Other Agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)

a) California Water Resources Control Board

- 10.** Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? While the City of Holtville has not received a request for consultation for the project

pursuant to California Public Resources Code Section 21080.3.1, the draft IS/MND was sent to the Native American Heritage Commission (NAHC) during a 30-day review period for review and comments. As of the preparation of this revised MND, no comments from the NAHC were received.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

EXHIBIT A – REGIONAL LOCATION MAP

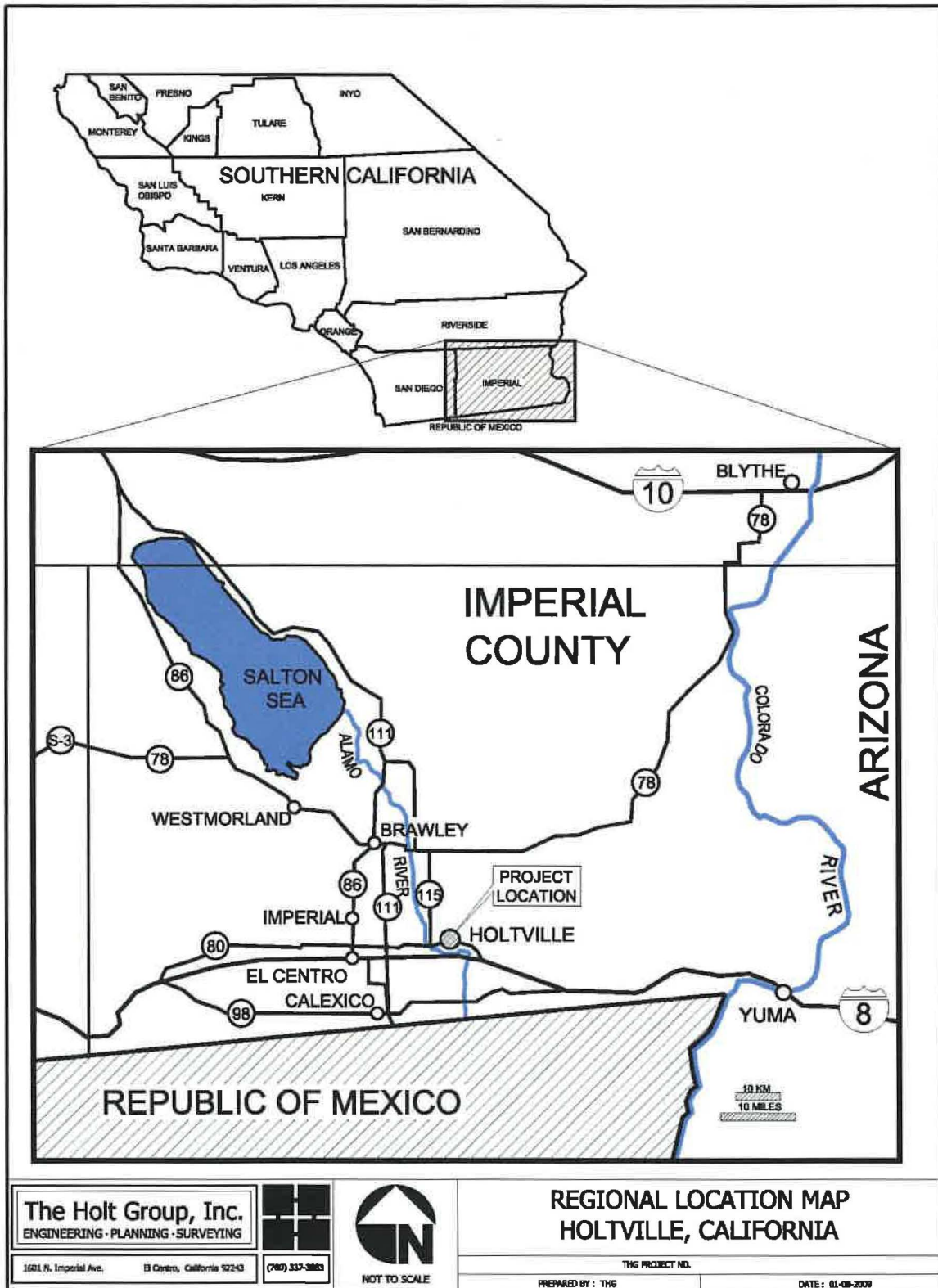
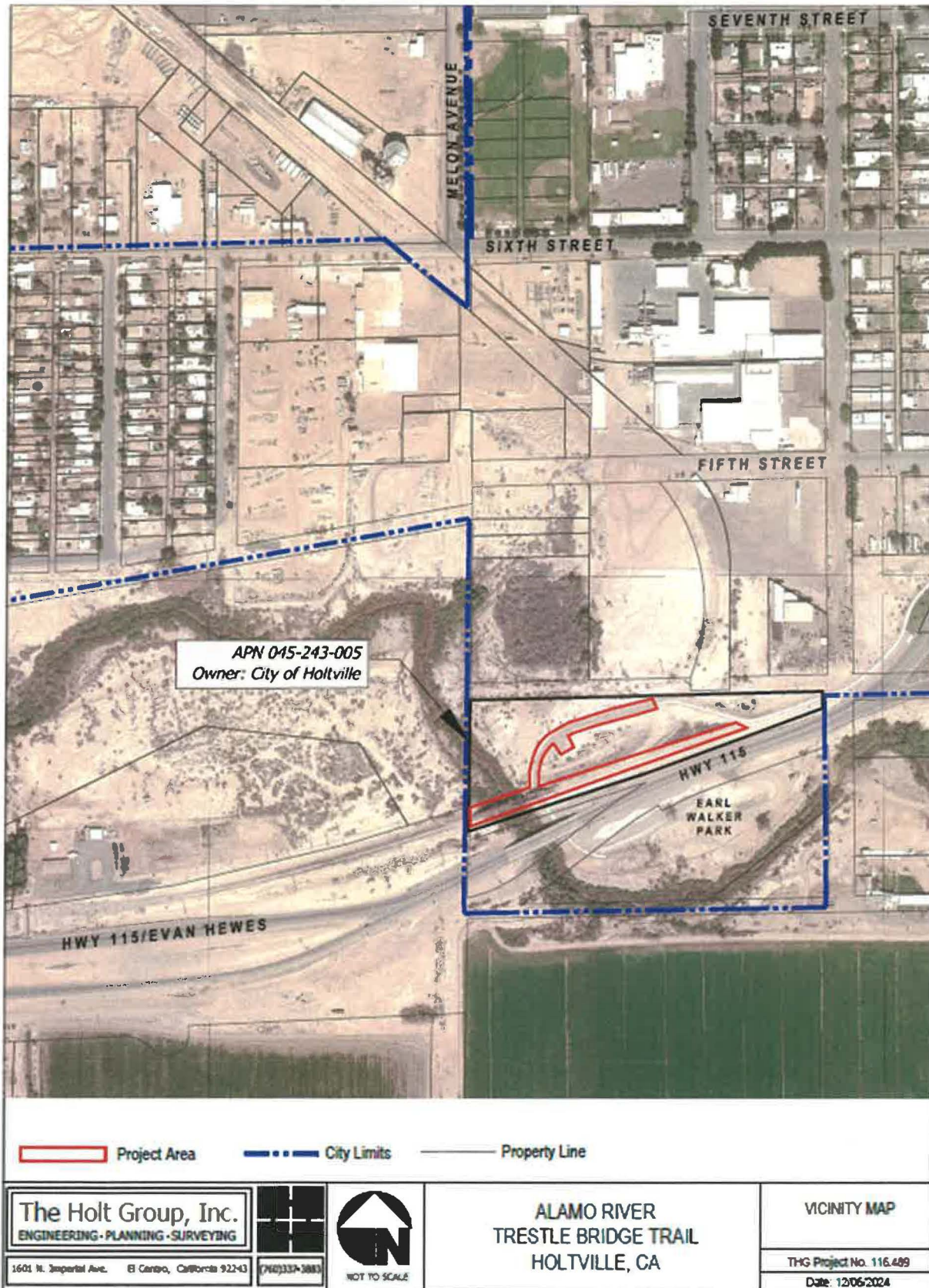


EXHIBIT B – THE ALAMO RIVER TRAIL TRESTLE BRIDGE



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agricultural and Forestry Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources		Energy
X	Geology/Soils		Greenhouse Gas Emissions		Hazard & Hazardous Materials
	Hydrology/Water Quality		Land Use/Planning		Mineral Resources
	Noise		Population/Housing		Public Services
	Recreation	X	Transportation		Tribal Cultural Resources
	Utilities/Service Systems		Wildfire	X	Mandatory Findings of Significance

ENVIRONMENTAL REVIEW COMMITTEE DETERMINATION:

On the basis of the attached Initial Study, the City of Holtville's Environmental Review Committee finds that:

The proposed project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
The proposed project could have a significant effect on the environment; however, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
The proposed project MAY have a significant effect(s) on the environment and an ENVIRONMENTAL IMPACT REPORT is required	
The proposed project MAY have a significant effect(s) on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated." A FOCUSED ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
Although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (1) have been analyzed in an earlier EIR pursuant to applicable standards and (2) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project. No further action is required.	

CA Department of Fish and Game

VOTE**No Impact Finding** ☐ Requested


04/28/2025

George Galvan, AICP, City Planner

Date

Yes	No	Abstain	Members of the EEC
X			Public Works
X			Police
X			Fire
X			Planning
X			Finance

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantially adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Background:

The main proponent of the proposed project consists of the demolition and replacement of the damaged structural bent timbers, cross beams, and other structural components of the trestle bridge along with the installation of new decking to serve as a multimodal pathway suitable for non-motorized users including pedestrians, bicycles and equestrian traffic. Additional improvements consist of extending the existing Alamo River Trail to connect to the trestle bridge and the addition of trail side amenities such as landscaping, benches, and signage. The trestle bridge dates to 1904 where it served freight rail traffic up to 1995 when said traffic ceased operation. The trestle bridge is composed of both a timber bent system at both ends and a steel space truss system in the middle making for a unique landmark in the City of Holtville visible to pedestrian traffic along the Alamo River Trail and vehicular traffic traveling through State Highway 115 just south of the bridge. The materials making up the trestle bridge complement the City of Holtville's historic architecture which includes classical revival, mission revival, and California desert architectural styles. As such, all damaged segments of the trestle bridge will be replaced with materials intended to match the nondamaged portions of the bridge and conserve its aesthetic design to the maximum extent possible. Once completed, the pedestrian walkway atop the trestle bridge will provide an overhead view of the Alamo River which consists of undisturbed land with overgrown brush and arrowweed, salt cedar, quail bush, iodine bush, phragmites, mesquite, desert mistletoe, creosote, and five hook bassia. Upon completion, the extension of the existing Alamo River Trail to the trestle bridge will provide more recreational amenities and improve public access to the bridge's visual character and quality of the Alamo River open space. The project does not include any changes or alterations to the Alamo River and will only replace damaged portions of the trestle bridge with the same or similar materials, install a pedestrian walking trail on the deck of the bridge, and pave the existing unpaved portions of the Alamo River Trail up to the trestle bridge. Thus, the project will preserve the surrounding area and minimize all aesthetic impacts to the lowest extent possible. Therefore, there will be no significant adverse impacts to the aesthetics of the surrounding areas.

Aesthetics Impact Discussion:

- a) **Have a substantial adverse effect on a scenic vista? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. To preserve the visual aesthetic of the trestle bridge, the materials used for replacement will be the same or similar to the nondamaged segments of the bridge. The trestle bridge overlooks the Alamo River, which provides a scenic view of the natural areas along the river. By repairing the bridge and establishing a pedestrian walkway, the City of Holtville will be opening the scenic view to the public while retaining its aesthetic properties. The improvements to the Alamo River Trail will replace the existing gravel portions of the trail and add additional amenities to make it more accessible to the public and protect the natural aesthetics of the Alamo River by limiting pedestrian traffic to an established walking and bicycle trail. Therefore, the project will not result in any adverse effects on a scenic vista.
- b) **Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The project will not damage, alter, or remove any scenic resources from the Alamo River. The project will instead repair and improve an existing structure and walking trail through the addition of native landscaping and trail side amenities along the existing trail. Furthermore, the California Department of Transportation does not list any scenic highways near the project site. Therefore, there will be no impact.
- c) **In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? - Less Than Significant Impact** - The trestle bridge provides an overhead view of the Alamo River which currently consists of undisturbed land with overgrown brush and arrowweed, salt cedar, quail bush, iodine bush, phragmites, mesquite, desert mistletoe, creosote, and five hook bassia. The Alamo River Trail takes advantage of this natural scenery by implementing a pedestrian trail to give users an accessible public trail and protecting the natural aesthetics of the Alamo River by limiting nonmotorized traffic to an established walking and bicycle trail. The project will provide a unique view of the wildlife along the Alamo River via the repair of the trestle bridge, installing a multimodal walkway on the deck of the bridge, and completing the improvements to the Alamo River Trail. Rather than degrade the existing public view, the project will further enhance it via the creation of a new vista at the top of the bridge. Additionally, the proposed project furthers the goal of the City of Holtville Zoning Ordinance as it is located within an open space zone which is intended for the preservation of natural resources, managing production of resources, outdoor recreation, protection of public health and safety, and preservation of natural scenic areas for the existing and future population. Therefore, the proposed project will have a less than significant impact.
- d) **Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area? - Less Than Significant Impact** - The proposed project does not include any structures or building materials with highly reflective properties such as glass or high gloss surface colors that would adversely affect day or nighttime views in the area. While solar bollard lights are proposed for the pedestrian walkway, said fixtures are intended to ensure the health and safety of the public utilizing the bridge and will have all lighting fixtures directed on the walkway away from the Alamo River and surrounding properties. Therefore, the project will have a less than significant impact.

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Background:

The Alamo River Trail Trestle Bridge was constructed around circa 1904 where it operated as a bridge for freight rail traffic until it was decommissioned in 1995. Since its decommissioning the bridge remained unutilized until its acquisition by the City of Holtville and plans to convert it into a multimodal walkway went underway. The Alamo River Trail was officially opened to the public in 2016 and continues to operate as an accessible trail for public use. The project site is unsuitable for agricultural use given its proximity to the Alamo River and the sloped topographical nature of the surrounding land. There is also no history of prior agricultural uses in or near the project site. Furthermore, neither the United States Forest Service nor the Bureau of Land Management identify any forest lands within the County of Imperial where the proposed project is located.

Agricultural Resources Impact Discussion:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? - No Impact** - The trestle bridge served as a bridge for freight rail traffic from 1904 to 1995 where it was decommissioned and remained unused for decades. While the City of Holtville Zoning Ordinance allows specific agricultural uses within Open Space zones, the proximity to the Alamo River and sloped topography makes the land unsuitable for agricultural uses. Thus, there is no history of the project site being utilized for agricultural uses. Furthermore, the California Department of Conservation Farmland Mapping and Monitoring Program classifies the project site as other land which includes vacant nonagricultural land as part of its description. Therefore, the proposed project will have no impact on important farmland.
- b) **Conflict with existing zoning for agricultural use, or a Williamson Act contract? - No Impact** - The proposed project site is zoned Open Space which is intended for the preservation of natural resources, managing production of resources, outdoor recreation, protection of public health and safety, and preservation of natural scenic areas for the existing and future population. While limited agricultural uses are permitted in Open Space zones, the proximity to the Alamo River and topography makes it unsuitable for agricultural uses. Furthermore, the surrounding properties are all zoned industrial and residential mixed-use which do not permit agricultural uses nor are they within a Williamson Act contract. Therefore, the proposed project will have no impact.
- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 511040(g))? - No Impact** - According to the United States Forest Service and the Bureau of Land Management, there are no forest lands nor timber lands within the County of Imperial where the proposed project is located. Therefore, the proposed project will have no impact on both forest and timber lands.
- d) **Result in the loss of forest land or conversion of forest land to non-forest use? - No Impact** - As previously mentioned, neither the United States Forest Service nor the Bureau of Land Management identify forest lands nor timber lands within the County of Imperial where the proposed project is located. Therefore, the proposed project will have no impact on forest and timber lands.
- e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? - No Impact** - As previously mentioned, the California Department of Conservation Farmland Mapping and Monitoring Program classifies the project site as other land or vacant nonagricultural land while both the United States Forest Service and the Bureau of Land Management lists zero forests within the County of Imperial where the proposed project is located. Therefore, there is no risk of converting farmland into nonagricultural uses nor forest land into non forest use. Thus, the proposed project will have no impact.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Background:

The project site is located within the Salton Sea Air Basin. The Imperial County Air Pollution Control District (ICAPCD) is responsible for ensuring that all State and Federal ambient air quality standards are achieved and maintained within the County of Imperial. The County of Imperial is designated as a "non-attainment" area with respect to Federal Standards for both particulate matter (PM₁₀) and ozone (smog). Rural single-family homes are within a quarter mile of the project site and immediate vicinity which are considered sensitive receptors. Grading and construction activities of the proposed project may generate significant amounts of dust (PM₁₀). It is estimated that construction will take approximately two (2) months to complete. Mitigation measures will need to be incorporated to lessen impacts from dust, in accordance with ICAPCD regulations. Additionally, the project will comply with all ICAPCD rules and regulations.

Air Quality Impact Discussion:

- a) Conflict with or obstruct implementation of the applicable air quality plan? - Less Than Significant Impact** - Operation of the proposed railroad bridge repair and Alamo River Trail improvements will not result in emissions of significant quantities of criteria pollutants listed in the California Ambient Air Quality Standards or toxic air contaminants as identified by the California Air Resources Board, nor will it obstruct the implementation of any air quality plan. ICAPCD requires all construction projects to acquire a permit prior to any construction activities. Rather than conflict or obstruct the implementation of an air quality plan, the City of Holtville will require the preparation of a dust control plan and the implementation of air quality measures as required by ICAPCD. Therefore, the proposed project will have a less than significant impact to any applicable air quality plans.
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? - Potentially Significant Unless Mitigation Incorporated** - The County of Imperial is a nonattainment area for both particulate matter (PM₁₀) and ozone. Vehicle trips will be generated by the proposed project during construction. According to ICAPCD, projects that generate less than 2,000 average daily trips (ADT) are below the screening level criteria.

Thus, Short-term emissions resulting from construction activities will need to be reduced through the implementation of mitigation measures incorporated into the project. It is estimated that construction will take approximately two (2) months to be completed.

Mitigation Measures

AQ-1: Dust Control Plan

The contractor shall submit a Dust Control Plan identifying all sources of PM10 Emissions to ICAPCD for approval. Construction of the project site will be subject to the requirements of ICAPCD Rule 800, Fugitive Dust Requirement for control of fine particulate matter (PM10).

- *Inactive Construction Areas:* Apply non-toxic soil stabilizers, dust suppressants, tarps, or other suitable material to all inactive construction areas. Visible emissions shall be limited to 20% opacity for dust emissions.
- *Active Site Area:* Water active site areas twice daily or as needed to comply with Regulation VIII.
- *Storage Piles:* Control dust for material storage piles by either enclosing, covering and watering twice daily or as needed to comply with Regulation VIII. Outdoor storage of fine particulate material is prohibited.
- *Hauling:* All trucks hauling dirt, sand, soil, or other loose materials shall be covered, unless six inches of freeboard space from the top of the container is maintained with no spillage. In addition, the cargo compartment of all haul trucks is to be cleaned or washed at the delivery site after removal of bulk material.
- *Adjacent Roadways:* Pave permanent roads as quickly as possible to minimize dust. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the project site. Sweep streets at the end of the day.
- *Unpaved Roads and Parking/Staging Areas:* Apply water three times daily, dust suppress or chemically stabilize with non-toxic soils all unpaved roads and parking. Visible emissions shall be limited to 20% opacity.
- *Speed Limit:* Traffic speeds on unpaved roads shall be limited to 5 miles per hour.
- *Construction Roadways:* Pave construction roads that have a traffic volume of more than 50 daily trips. Access roads leading into the construction site shall be paved at least 25 feet from the main road.
- *Disturbed Areas:* When active construction ceases on the site, replace ground cover as quickly as possible.
- *Track Out or Carry Out:* Track out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.

Timing/Implementation: Prior to and during construction/Contractor

Enforcement/Monitoring: City of Holtville

AQ-2: Air Quality Measures

The Applicant shall ensure the following air quality measures are shown on applicable grading permits:

- a. Construction of the project site will be subject to the requirements of the Imperial County Air Pollution Control Standard Mitigation Measures for Construction Combustion Equipment:

- Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.
 - Minimize idling time either by shutting equipment when not in use or reducing the time of idling to 5 minutes as a maximum.
 - Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
 - Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).
 - Maintain all construction equipment in proper tune according to manufacturer's specifications; fuel off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generators sets, compressors, with ARB certified motor vehicle diesel fuel.
- b. To provide a greater degree of reduction of PM10 emissions from construction combustion equipment per Air Pollution Control District recommendations, the project shall curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways.
- c. The proposed project shall further implement activity management (e.g. rescheduling activities to reduce short-term impacts).

Timing/Implementation: During Construction/Contractor

Enforcement/Monitoring: City of Holtville

- c) **Expose sensitive receptors to substantial pollutant concentrates? - Potentially Significant Unless Mitigation Incorporated** - The proposed project is located within a quarter of a mile of existing residences. The potential increase in emissions within this area and region, as a result of the construction of the proposed project in addition to other related activities have the potential to contribute to the generation of pollutant concentrates. The project will need to incorporate dust control measures in accordance with ICAPCD regulations for dust control during construction activities. It is estimated that construction will take approximately two (2) months to be completed. Mitigation measures have been incorporated to mitigate any potential impacts caused by the project.

Mitigation Measures

Implement Mitigation Measure AQ-1: Dust Control Plan

Implement Mitigation Measure AQ-2: Air Quality Measures

- d) **Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? - Less Than Significant Impact** - The proposed project is adjacent to vacant parcels and State Highway 115 which are within a quarter of a mile from the nearest sensitive receptor (residential zone) and at a lower elevation from said receptors making the generation of odors above what is normal in the area unlikely during construction. Therefore, the project will have a less than significant impact.

IV. BIOLOGICAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Background:

A formal biological survey was conducted in June of 2016 for the City of Holtville Alamo River Wetlands Walking Trail project which stretches approximately 1.3 miles from Earl Walker Park, 500 feet south of the project site, to the City of Holtville Wetlands north of the project site. While the survey spans the length of the proposed Alamo River Walking trail, the trestle bridge project is well within the biological surveys scope given that the trestle bridge and portions of the trail to be improved are part of the overall Alamo River Trail project. The 2016 biological survey concluded by stating that no riparian habitats nor any endangered, threatened, or species of concern would be affected (See **Appendix A - Biological Report**). Nonetheless, the age of the survey coupled with potential disturbance from construction activities within this area may potentially impact the biological resources in the area thus requiring mitigation measures to reduce the impact to less than significant.

Biological Resources Impact Discussion:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? - Potentially Significant Unless Mitigation is Incorporated** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The 2016 biological survey determined that no endangered, threatened, or species of concern would be affected by the Alamo River Trail project which encompasses the proposed trestle bridge repairs and trail improvements. The survey further focused on searching for signs of Burrowing Owl (BUOW) activity but made no such findings and determined that the habitat is not favorable to burrowing and that the burrowing owl would not be expected in the trail area which includes the project site. While the survey did not identify any impact on endangered, threatened, or species of concern, the survey's age is a concern since it does not fully account for the current conditions of the project site and the single survey may not address all potential impacts to biological resources in the area. Therefore, the City of Holtville will implement the following measures as recommended by the California Department of Fish and Wildlife (CDFW):

Mitigation Measures

BIO-1: Nesting Bird Survey

To minimize avoid impacts to nesting birds in the Project Site, the Qualified Avian Biologist shall conduct pre-construction surveys of all potential raptor and passerine nesting habitat within the Project Site. The raptor survey shall focus on potential nest sites (i.e., utility poles and trees) within a 300-foot buffer around the Project site. These surveys shall be conducted no more than 14 days prior to ground-disturbing activities. The Qualified Avian Biologist must be able to determine the status and stage of nesting migratory birds and all locally breeding passerine and raptor species without causing intrusive disturbance.

If active nests are found, within the Project area or within 500 feet of the Project area, the nest shall be flagged and mapped on the construction plans and a suitable buffer based on the species' sensitivity to disturbance, and as determined by the Qualified Avian Biologist shall be established around active nests, and no construction within the buffer shall be allowed until the Qualified Avian Biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Buffers may be reduced at the discretion of the Qualified Avian Biologist based on Project activity, line of sight, tolerance of individuals, and stage of the nest. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall be conducted when construction occurs in close proximity to an active nest buffer. The buffer shall remain in place until determined by the Qualified Avian Biologist that the nestlings have fledged, and the nest is no longer active. If an active nest is encountered during the Project construction, construction shall stop immediately until a Qualified Avian Biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-2: Buffers

If active avian nest(s) are discovered within or 500 feet from the work limits, a buffer shall be delineated around the active nest(s) measuring 300 feet. A qualified biologist shall monitor the nest(s) weekly after commencement of construction to ensure that nesting behavior is not adversely affected by such activities.

Timing/Implementation: Prior to and during Construction/ Licensed Biologist and Contractor

Enforcement/Monitoring: City of Holtville

BIO-3: Noise Mitigation Program

During all Project construction, the City of Holtville shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City of Holtville shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

Timing/Implementation: During Construction/Contractor

Enforcement/Monitoring: City of Holtville

BIO-4: Burrowing Owl

Western Burrowing Owl. If complete avoidance cannot be achieved an CESA Incidental Take Permit (ITP) for western burrowing owl shall be obtained prior to initiation of ground disturbing activities. The Project proponent shall adhere to measures and conditions set forth within the ITP. Compensatory mitigation for direct impacts to the species shall be fulfilled at a minimum 1:1 ratio through purchase of available western burrowing owl conservation bank credits suitable for CESA mitigation (if available), perpetual conservation and management of suitable and occupied western burrowing owl habitat of equal or better quality, or another method as reviewed and approved by CDFW. Burrowing Owl Avoidance. If burrowing owls are detected on-site, a Qualified Biologist, knowledgeable of burrowing owl habitat and behavior, shall establish a no-disturbance buffer following the guidelines within the 2012 Staff Report on Burrowing Owl Mitigation (or most recent version) around all burrowing owl burrows such as roosting and satellite burrows within the Project area and an appropriate buffer determined by the Qualified Biologist, with posted signs demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. The Qualified Biologist shall delineate burrows with different materials than those used to delineate the Project area, and the materials shall not attract raptor perching. Project proponent shall remove and properly dispose of all materials used for delineation immediately upon completion of the Project.

To ensure that the Project avoids impacts to burrowing owl, a Qualified Biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses or a break in construction activities of 3 days will trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.

Timing/Implementation: Prior to Construction/City of Holtville, Qualified Biologist, CDFW, and Contractor

Enforcement/Monitoring: City of Holtville

BIO-5: LSA Agreement

If project activities occur in the Alamo River, CDFW will be notified for a Streambed Alteration Agreement (LSA) pursuant to Fish and Game Code section 1602.

Timing/Implementation: Prior to Construction/City of Holtville and CDFW

Enforcement/Monitoring: City of Holtville

BIO-6: Biological Survey

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish and Game Code §§ 3511, 4700, 5050, 5515), shall be completed. Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Species-specific surveys following protocols and guidelines, shall be completed by a Qualified Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Appropriate avoidance, minimization, and mitigation measures shall be developed for present species in consultation with CDFW, which may include obtaining a CESA incidental take permit (ITP).

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-7: Swallow Nesting

Construction shall either occur outside of the swallow nesting period (generally March 15 through August 31), or the City of Holtville shall submit to CDFW, for review and approval, a Nesting Bird Avoidance Plan, prepared by a Qualified Avian Biologist which could include methods to deter swallow nesting.

Timing/Implementation: Prior to and during Construction/City of Holtville and CDFW

Enforcement/Monitoring: City of Holtville

BIO-8: Bat Species

Prior to the start of Project activities, the City of Holtville shall retain a Qualified Bat Biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the proposed Project. Within suitable bat roosting habitat, the Qualified Bat Biologist shall conduct 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 the Qualified Bat Biologist. Surveys shall be conducted during favorable weather conditions only. 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, and to determine if night roosting is occurring in the area. The following actions will also be conducted as needed:

- If bats are found using any trees or structures within the Project area, including the bridge and any cliff swallow nests on the bridge, the Qualified Bat Biologist shall identify the bats to the species level and evaluate the colony, if applicable, to determine its size and significance. The bat survey results shall include: 1) the exact location of all roosting sites (location shall be described and mapped); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present (including how the species was identified); 4) the location of all signs of bats (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks, and bats squeaking and chattering)(described and mapped); 5) the type of roost: maternity roost, winter roost (hibernacula), and night roost (resting at night while out feeding) versus a day roost (resting all day) must also be clearly stated; and 6) proposed avoidance and minimization measures, including avoidance of bats in swallow nests. The results of the survey shall be submitted to CDFW for review prior to initiating Project activities.
- If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction within these areas shall only occur generally between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Appropriate time to start Project construction to avoid impact shall be confirmed by a Qualified Bat Biologist. Maternity roosts shall not be evicted, excluded, removed, or disturbed.
- If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan prepared by the Qualified Bat Biologist shall be submitted for CDFW review and approval prior to relocation and construction activities. The Qualified Bat Biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall also be in place with sufficient timing prior to the initiation of Project-related activities to allow bat relocation, with the timing specified by the Qualified Bat Biologist with consideration of the species. Removal of roosts shall be guided by accepted exclusion and deterrent techniques developed by the Qualified Bat Biologist. The City shall compensate no less than 2:1 for permanent impacts to roosting habitat with replacement and permanent protection of roost habitat.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-9: Yuma Ridgway Rail Survey

Prior to the start of Project activities, a biologist who has a valid 10(a)(1)(A) Fish and Wildlife Service recovery permit and a CDFW CESA Memorandum of Understanding for Yuma Ridgway's rail shall perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project Evaluation within a 500-foot buffer of the Project. The survey requires 6 callback surveys between March 1 and May 15. If presence of Yuma Ridgway's rail is detected, Project activities that require the use of heavy equipment shall not take place during the species peak

breeding season (generally February 15 to September 30). CDFW shall be notified in writing of the detection of this species within three (3) days. If protocol surveys indicate this species is not present within the 500-foot buffer, Project activities may proceed subject to the other provisions of federal and state law. The results of the protocol surveys shall be provided to CDFW prior to commencement of Project activities.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-10: Burrowing Owl Breeding and Non-breeding Surveys

The City of Holtville shall perform breeding and non-breeding surveys per the guidance of the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012), assess the impact, and create mitigation measures to include avoidance, minimization, and mitigation for any burrowing owls identified on-site, and these same measures be applied to any individuals found during any take avoidance surveys. The guidance of mitigating impacts to burrowing owls in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012) shall be followed, including (a) permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced with permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-11: Arrow-weed Thickets

To the greatest extent practicable, all project plans shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the City of Holtville shall restore the habitat to pre-project conditions, or compensatory mitigation for direct and permanent impacts consisting of habitat acquisition at a minimum of a 2:1 ratio. Habitat acquisition sites shall be biologically equal or superior to existing conditions and shall be conserved and managed in perpetuity.

Timing/Implementation: Prior to and during Construction/Contractor

Enforcement/Monitoring: City of Holtville

BIO-12: Nighttime Lighting

During Project construction and operations over the lifetime of the Project, the City of Holtville shall eliminate all nonessential lighting throughout the Project area and avoid the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Holtville shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, 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 <https://darksky.org/>). The City of Holtville 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.

Timing/Implementation: Prior to and during Construction/Contractor

Enforcement/Monitoring: City of Holtville

BIO-13: Education Program

A Qualified Biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include, but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area and (2) protected species that have the potential to occur on the Project site. Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work onsite.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? - Potentially Significant Unless Mitigation Measures are Incorporated** - Sensitive habitats are those that are designated either rare within the region by governmental agencies or known to support sensitive animal or plant species and/or they serve as "corridors" for wildlife within the region. The vegetation community along the Alamo Riverbanks mainly consists of weedy plants such as salt cedar, fragmites and arrowweed. The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. While the project is not proposing to remove any existing vegetation, the City will strive to avoid and minimize impacts to the vegetation to the greatest extent possible. Furthermore, the City of Holtville will still implement the following mitigation measures as recommended by CDFW.

Mitigation Measures

Implement Mitigation measure BIO-1: Nesting Bird Survey

Implement Mitigation measure BIO-2: Buffers

Implement Mitigation measure BIO-3: Noise Mitigation Program

Implement Mitigation measure BIO-4: Burrowing Owl

Implement Mitigation measure BIO-5: Streambed Alteration Agreement

Implement Mitigation measure BIO-6: Biological Survey

Implement Mitigation measure BIO-7: Swallow Nesting

Implement Mitigation measure BIO-8: Bat Species

Implement Mitigation measure BIO-9: Yuma Ridgway Rail Survey

Implement Mitigation measure BIO-10: Burrowing Owl Breeding and Non-breeding Surveys

Implement Mitigation measure BIO-11: Arrow-weed Thickets

Implement Mitigation measure BIO-12: Nighttime Lighting

Implement Mitigation measure BIO-13: Education Program

- c) **Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? - No Impact** - The proposed project site does not contain areas targeted for preservation and enhancement as wetlands. The nearest wetland planning area is located 1.3 miles north of the project site but will have no direct effect on the site. Therefore, the proposed project will not have any adverse impacts on federally protected wetland stream channels.
- d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? - Less Than Significant Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. While the project is expected to open access to the bridge and increase the human use of the trail, the affected areas are already disturbed and will not negatively encroach, nor impact areas used by wildlife. Therefore, the proposed project is expected to have a less than significant impact on the movement of wildlife species in the area.
- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? - No Impact** - There are no local ordinances or policies in effect protecting biological resources within or near the project site; therefore, there will be no impact.
- f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? - No Impact** - The proposed project site is not located within or in the vicinity of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan; therefore, there will be no impact.

V. CULTURAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of designated cemeteries?			X	

Background:

In Imperial County, approximately 7,000 prehistoric archaeological sites have been recorded (Imperial County General Plan, 1998). A wide variety of site types are represented including settlements, trails, rock art, geoglyphs, fish traps, and resource procurement and manufacturing locations. The distribution

and availability that currently exists is a direct consequence of several environmental and historic factors which include the periodic flooding of ancient Lake Cahuilla and the existence of the New River and Alamo River. These factors encouraged prehistoric settlement and resource use in the vicinity of their shorelines and riverbanks.

Within the City of Holtville there are various historic structures including City Hall, Holt Park, and the water tower (Holtville, 2003). Although the City of Holtville has many properties with historic value, none have been recognized as a California Historical Landmark within City Limits. The nearest historical landmark is the Tecolote Rancho Site, located approximately 1.5 miles from the proposed project site on East Country Highway 8 and Barbara Worth Road. Out of an abundance of caution, a cultural resources survey was completed in July of 2016 which resulted in the identification of two previously recorded historical resources located outside of the project but within half a mile of the project site: 1) Holt Park (City Hall Buildings) and the Ash Main Canal (**See Appendix B-Cultural Resources Report**). Furthermore, on January 31, 2022, a Historic Resources Mitigation Measures report was conducted to clarify mitigation measures for the proposed improvements to ensure any restoration of the bridge is done with the intent to preserve its historical structure and characteristics (**See Appendix C – Historic Resources Mitigation Measures for the Holton Interurban Railway Alamo River Trestle Bridge**).

Cultural Resources Impact Discussion:

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? - Potentially Significant Unless Mitigated** - Approximately 200 historic sites have been recorded in Imperial County. A record search through the Southeast Information Center (SIC) located at the Imperial Desert Museum did not identify any known historical resources eligible for the California or National Register near the proposed project site. As part of its conditional approval for the proposed project, the City of Holtville required that mitigation measures be prepared prior to initiating the repair of the trestle bridge to ensure the repairs respect the historic structure's construction and changes over time. In response to the Cultural Resources Survey, A Historic Resources Mitigation Measures study was prepared for the proposed project. The study recommended several mitigation measures to be implemented for the rehabilitation and repair of the bridge to ensure that the historic design and construction of the bridge are part of the improvement project. With the implementation of these recommended measures, the impact to the historical resource will be mitigated.

Mitigation Measures:

CR-1: Inventory of Existing Conditions

Prior to the repair or rehabilitation of the bridge, it is recommended that an inventory be conducted to determine the age of the current existing materials. Specifically, the different elements of the bridge should be inspected to determine if they are original to the bridge or if they were modified/added at a later date. If individual members were replaced in-kind as part of the maintenance of the bridge over time, these do not need to be removed. Only materials that altered the original design or appearance of the bridge should be removed; however, replacement members should be noted in the inventory for documentation purposes.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-2: Historic American Engineering Record

Prior to the repair or rehabilitation of the bridge, it is recommended that the current condition of the bridge be documented through HAER-like documentation. The inventory of existing conditions conducted prior to this task should be used to help describe any modifications that have been made to the bridge and identify the remaining original portions. The HAER-like report should include a written presentation describing the physical entity and any appropriate engineering or architectural elements deemed important to the historical record. The report

should provide a history of the bridge and its association with the development of the cities of El Centro and Holtville. The HAER-like process includes gathering historic photographs and any available engineering drawings, plans, and elevations. The formal recordation of the current configuration of the bridge includes digital photographs keyed to an engineering map of the bridge and a site plan to show the location of each photograph. All information and photographs generated by the HAER-like program should be incorporated into a report and attachments prepared for submittal to the City of Holtville and any designated curation centers.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-3: Removal of Non-Historic Materials

All materials added to the bridge after its 1904 completion that altered its original appearance should be removed if feasible. This includes the steel truss that was added in place of the original trestle and the metal deck plates added to either side of the railroad tracks. Any additional modern materials identified during the inventory of the bridge, or due to their absence in historic photographs or drawings, should also be removed.

Timing/Implementation: During Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-4: Inspection of Existing Materials for Decay and Treatment

The historic materials remaining after modern elements have been removed should be inspected for decay.

Timing/Implementation: After Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-5: Repair and Replacement of Decayed or Damaged Materials

All original bridge members or materials that are rejected due to decay or damage should be repaired or replaced in-kind with historically accurate materials to retain the bridge's original historic character. Historic photographs and drawings found during historical research should be used as guidance for the repair and in-kind replacement of decayed or damaged materials. Any materials to be added to the historic bridge to facilitate the pedestrian use of the river crossing as part of the trail project shall match, to the extent possible, the appearance of the original materials. The existing track should remain but could be bordered by wood planks of sufficient height to allow a level pedestrian passage across the bridge. Finally, a plaque or historical marker should be placed at the entrance to the bridge that provides a description of the bridge's history, providing any historic images that reflect the history of the rail line in the growth of the area.

Timing/Implementation: During Construction/Contractor

Enforcement/Monitoring: City of Holtville

- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? - Potentially Significant Impact Unless Mitigation is Incorporated** - A sensitivity site map was prepared by Mr. Jay Von Werlhof of Imperial Valley College illustrating general areas that are very sensitive or moderately sensitive to contain prehistoric resources as well as those areas not expected to contain any prehistoric resources. The survey identified the areas along the Alamo River as very sensitive since it was extensively utilized by the Kamia as late as the mid 1800's. Although a search of existing records on the project site identified no known significant archeological resources for the project, the City of Holtville will still take precautionary measures so that any potential impacts to archeological resources are mitigated to less than significant. Mitigation measures have been incorporated to ensure any impacts are less than significant.

Mitigation Measures:**CR-6: Project Design**

Design and construction of the Pete Mellinger Alamo River Trail and modifications to the historical railroad bridge must be precisely delineated to avoid any identified historic sites.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-7: Cultural Materials

The design/construction plans shall further incorporate language that stipulates that if buried cultural materials are encountered during construction, work in that area must halt until a qualified archaeologist can evaluate the nature and significance of the finding.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-8: Evaluation Program

If design of the trail is unable to avoid the historic sites beyond 50 feet of their original delineation, a cultural/historic evaluation program to assess potential impacts associated with the proposed project shall be prepared prior to any construction activities and an amendment to this MND shall be prepared and recirculated if further mitigation measures are warranted.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

CR-9: Archeologist

An archaeologist shall be present should excavation be proposed at depths greater than five feet.

Timing/Implementation: Prior to and during Construction/Contractor

Enforcement/Monitoring: City of Holtville

- c) **Disturb any human remains, including those interred outside of designated cemeteries? - Less Than Significant Impact** - Based on a search of the existing records, a formal cemetery exists approximately three quarters of a mile west of the project location. While the formal cemetery is located a sufficient distance from the project site so as not to be affected, the following mitigation measure will be implemented to further ensure that any potential impact is reduced to less than significant.

Mitigation Measure:**CR-10: Discovery of Human Remains**

If evidence of human remains is discovered, construction activities within 200 feet of the discovery shall be halted or diverted and the Imperial County Coroner shall be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC which will designate a Most Likely Descendant (MLD) for the project (Section 5097.98 of the Public Resources Code). The designated MLD will be given 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with recommendations of MLD, the NAHC can mediate (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center, using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).

Timing/Implementation: During construction

Enforcement/Monitoring: NAHC, Imperial County Coroner, and Imperial County Department of Planning and Development Services.

VI. ENERGY. Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

Background:

Construction of the project site will be subject to the requirements of the Imperial County Air Pollution Control Standard Mitigation Measures for Construction Combustion Equipment. To provide a greater degree of reduction of PM10 emissions from construction combustion equipment per Air Pollution Control Districts recommendations, the project shall curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways.

Energy Impact Discussion:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. - Less than Significant Impact -** The project construction schedule is expected to last two (2) months. The proposed project would require site preparation, grading, structural repairs, landscaping, and paving. The construction phase would require energy for the manufacture and transportation of building materials, preparation of the site (e.g., site clearing, and grading), and repair of the trestle bridge. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks. The overall construction schedule and process are already designed to be efficient to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, it is anticipated that the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. Furthermore, all project related repairs and improvements are subject to Federal, State, and local energy efficiency requirements. Therefore, construction-related energy impacts would be less than significant.

Upon completion, the proposed project will have repaired the existing trestle bridge, installed a multi-modal walkway on the top deck, and extended and improved the existing Alamo River Trail to connect to the trestle bridge walkway. The operation of the project is not expected to be wasteful, inefficient, or unnecessarily consume energy resources since the trail will only be for nonmotorized forms of transportation. Furthermore, the landscaping will be irrigated using an existing irrigation line located parallel to the trail. Energy usage for the irrigation line will be the same or close to the same used for the existing line prior to the project. All lighting fixtures along the improved portion of the trail will be solar powered and will not require the construction or extension of any electrical facilities. The number of visitors traveling to the trail is expected to be the same if not close to the number currently utilizing the Alamo River Trail. Therefore, operation-related energy impacts would be less than significant.

- b) Conflict with or obstruct a state or local plan for renewable energy efficiency. - No Impact** - The proposed project furthers goal 6 of the Conservation/Open Space Element of the City of Holtville General Plan which implements policies aimed at promoting energy conservation and efficiency. The long-term goal of the project is to establish a nonmotorized network connecting public, residential, and commercial areas of the City of Holtville.

VII. GEOLOGY AND SOILS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
2) Strong seismic ground shaking?		X		
3) Seismic-related ground failure, including liquefaction?			X	
4) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
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Background:

The project site is located in the Imperial Valley portion of the Salton Trough, a topographic and geologic depression resulting from large scale regional faulting. Tectonic activity that formed the Trough continues at a high rate and moderate to strong ground motion from faults in the region, including the Rico Fault which is the closest fault (approximately one mile away), Brawley, Superstition Hills, and Imperial Faults may occur. However, the site does not lie within an identified Earthquake Fault Zone. Therefore, surface fault rupture, seismically induced flooding and landslides are considered unlikely at the site.

Much of the near surface soils in the Imperial Valley consist of silty clays and clays which are moderately to highly expansive. If necessary, a Geotechnical Study will be required to assess soil conditions prior to beginning construction. All recommendations outlined in the Geotechnical Study will reduce any potential impacts to geology and soils from project construction and operation to below a level of significance and shall be strictly adhered to. Construction is estimated to take approximately two (2) months to complete.

Geology and Soils Impact Discussion:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? - No Impact** - The project site is not located in an identified fault rupture hazard zone. Surface rupture is considered unlikely at the project site and near the project area because of the well-delineated fault lines through the Imperial Valley as depicted on maps by the United States Geological Survey and the California Geological Survey. The closest major active faults are the Rico Fault and Superstition Mountain fault. No active faults or ground ruptures have been mapped underlying the site; therefore, there will be no impact.
- 2) Strong seismic ground shaking? - Less Than Significant Impact** - The City of Holtville, as well as the entire Imperial Valley, is considered to be a seismically active area. The project site may be susceptible to potentially strong seismic ground shaking because of the proximity to the Rico Fault (approximately one mile away), Brawley Fault Zone and Imperial Fault Zone. The existing trestle bridge was designed to withstand heavy loads from railway use and seismic activity. Rather than increase the loads on the bridge, the improvements will reduce the loads on the bridge and retain its ability to withstand seismic loads. If necessary, a Geotechnical Report will be prepared and the recommendations from the study will be followed to avoid potentially significant impacts from seismic activity.
- 3) Seismic-related ground failure, including liquefaction? - Less Than Significant Impact** - Prior geotechnical reports in the region have found the area to be potentially susceptible to liquefaction. The subject site is located about 4.5 miles east of the Imperial Fault, 5.5 miles southeast of the Brawley Fault, and about 1.0 mile east of the Rico Fault. Strong ground shaking can be expected for magnitudes of 6.0 and 7.2 events on these faults. If a Geotechnical Report is deemed necessary, the recommendations from the study will be followed to avoid potentially significant impacts from seismic activity.
- 4) Landslides - Less Than Significant Impact** - There are significant topographic variations along the Alamo River, however, no historic landslides are shown on geologic maps of the region as reviewed through the California Geologic Survey of Landslide Inventory Maps. In addition, no habitable structures are being proposed with this project, therefore, any potential impact would be less than significant.

Mitigation Measures**GEO-1: Geotechnical Report**

A site-specific geotechnical investigation shall be prepared on an as needed basis for the project and said geotechnical report shall be implemented and shown on applicable grading and building plans as details, notes or as otherwise appropriate.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

GEO-2: State Building Code

The proposed project is located near active faults; therefore, the proposed bridge repairs and improvements shall be made in accordance with the California State Building Code (Title 24 of the California Administrative Code), which contains specifications to minimize adverse effects due to ground shaking from earthquakes and liquefaction.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

GEO-3: State Water Resources Control Board Permit

The Contractor shall comply with the regulatory requirements of the State Water Resources Control Board's (SWRCB) Order No. 2009-0009 DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002 for Discharges of Storm Water Runoff Associated with Construction Activity, copies of which are available on SWRCB website at <http://www.swrcb.ca.gov/stormwtr/construction.html>.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

GEO-4: Storm Water Pollution Prevention Plan

The City, or its authorized representative, shall require the preparation of a Storm Water Pollution Prevention Plan by a qualified preparer and shall coordinate the Notice of Intent and appropriate annual fees to the State Water Resources Control Board.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

GEO-5: Storm Water Pollution Prevention Plan Practitioner

The Contractor shall be responsible for implementation of the SWPPP and shall have a qualified SWPPP Practitioner (QSP) available on site and be responsible for implementation of all Best Management Practices.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

b) Result in substantial soil erosion or the loss of topsoil? - Less Than Significant Impact

- The project area along the Alamo River Corridor contains diverse topographic features with steep slopes. The proposed project will not alter existing drainage patterns or any significant drainage features. To mitigate any potential impacts a Storm Water Pollution Prevention Plan will be required to be prepared and implemented by the construction contractor which shall follow Best Management Practices to ensure sediment does not erode from the proposed project site. Permanent Best Management Practices for erosion control will also be implemented to mitigate any potential impacts at disturbed areas to a less than significant level.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? - Less Than Significant Impact** - It is unknown whether the proposed project site is located within a known unstable geologic unit as a geotechnical report has not yet been prepared. The project site and vicinity contain diverse topographic features and landslides are possible although none are anticipated to occur as there are no records of historic landslides on geologic maps reviewed by the California Geologic Survey of Landslide Inventory Maps for the proposed project area. Therefore, if necessary, a geotechnical report will be prepared prior to the construction of any structures. The impact, however, would be less than significant.
- d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (UBC 1994), creating substantial direct or indirect risks to life or property? - Less Than Significant Impact** - A geotechnical report has not yet been completed for this project. The region has been found to contain underlain clays of moderate expansion potential. However, the proposed project does not propose constructing structures that would be affected by expansive soils. Therefore, these soils will not create substantial risks to life or property and any impacts would be less than significant.
- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? - No Impact** - The project area is located within the current city limits where septic tanks and alternative wastewater collection systems are not permitted. Therefore, there will be no impact.
- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? - No Impact** - The two cultural surveys conducted in 2016 and 2017 stated that there may be some locations with paleontological resources and geological features in the Imperial Valley, none of those locations are located on or in the proximity of the project site. Therefore, there will be no impact.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

Background:

The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. Although the project itself will not generate greenhouse gas emissions, it is expected that the machinery as well as the vehicles used for construction and to transport workers will release greenhouse gases. However, construction will only be temporary, and any impacts will be short-term. Construction is estimated to take approximately two (2) months to complete. Therefore, the potential for greenhouse gases will be less than significant.

Greenhouse Gas Emissions Impact Discussion:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? - Less Than Significant Impact** - The proposed project will generate greenhouse gas emissions as a result of construction materials during a short-term construction period. Construction is estimated to take approximately two (2) months to complete and is not expected to have a significant impact following its completion. Therefore, the proposed project will result in a less than significant impact.
- b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? - No Impact** - The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emission of greenhouse gases. The project will comply with the rules and regulations of the County of Imperial Air Pollution Control District and implement any required plans as necessary.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.				X

Background:

The proposed project is within an open space zone which is intended to provide open spaces for the preservation of natural resources, managed production of resources, outdoor recreation, the protection of public health and safety, and the preservation of natural scenic areas for the existing and future population. While limited agricultural uses are permitted within open space zones, the project sites proximity to the Alamo River and sloped topography makes it unsuitable for agricultural use. Thus, hazardous materials within the project's immediate vicinity will not be utilized by the project or the surrounding properties. Furthermore, Envirostor, an online data management system run by the State Department of Toxic Substances Control, identified no contaminated sites within or near the project area.

VII. HAZARDS AND HAZARDOUS MATERIALS IMPACTS AND DISCUSSION:

- a) **Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials? - No Impact** - This proposed project does not include any commercial or industrial development nor the use of hazardous substances during operation. Therefore, the project will have no impact.
- b) **Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? - No Impact** - The proposed project will not contain, handle, or store any potential sources of chemicals or compounds that would present a significant risk of accidental explosion or release of hazardous substances.
- c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? - No Impact** - The school nearest to the proposed project site is located a little over a quarter mile (0.33 miles) north of the site. The project will not handle, store, or transport hazardous material. Therefore, it will not have any effect on an existing or proposed school.
- d) **Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? - No Impact** - Neither the proposed project site nor any adjacent properties are listed as a hazardous material site. Furthermore, the proposed project site does not have a history of prior uses other than a railway bridge and walking trail. Therefore, the project will have no impact.
- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? - No Impact** - The proposed project area is not located within two miles of any public use airport.
- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? - No Impact** - The proposed project is not part of any adopted emergency evacuation plan, nor will it impair or physically interfere with an existing emergency response plan or emergency evacuation plan. Therefore, the project will have no impact.
- g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. - No Impact** - While the Alamo River has brushes and other vegetation along the river bottom, the proposed project will not traverse through said vegetation. Furthermore, the existing Alamo River Trail portions to be improved have already been grubbed and cleared of dry brush during the trails initial construction and ongoing maintenance in the past decade. Therefore, the proposed project will have no impact.

X. HYDROLOGY AND WATER QUALITY – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in a substantial erosion or siltation on- or off site; i. result in substantial erosion or siltation on- or off-site; ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv. impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Background:

There are no expected impacts to hydrology and water quality, the proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The project does not involve the construction of any new buildings or structures outside of the trestle bridge walkways and trail. While the project will require irrigation for the proposed landscaping, an

existing irrigation system will be utilized for the project. Additionally, the project will not necessitate services from any sewer system, nor does it propose alterations to current water ways.

X. HYDROLOGY AND WATER QUALITY IMPACTS AND DISCUSSION:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? - No Impact** - The project does not propose waste discharges that require waste discharge permits or NPDES permits from the Regional Water Quality Control Board. In addition, the project does not propose any known sources of polluted run-off or land use activities that would require special site design considerations, source control Best Management Practices, or treatment control BMP's. Best Management Practices will be implemented during construction activities, therefore there will be no violation of water quality standards or discharge requirements.
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? - No Impact** - Based on the regional topography, groundwater flow is assumed to be generally towards the incised Alamo River channel. The proposed project does not involve operations that would interfere with groundwater recharge including, but not limited to the following: the proposed project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of the Alamo River with impervious layers, such as concrete lining or culverts. In addition, the project does not propose to use groundwater for any purpose, including irrigation. Therefore, no impact on groundwater resources is anticipated.
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: - Less Than Significant Impact** -
- i. **result in substantial erosion or siltation on- or off-site;** The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. No deep excavation is expected to take place at the project site except at the bridge buttresses and all the drainage will be conveyed through natural drainage channels and approved drainage facilities. Therefore, the project will have a less than significant impact.
 - ii. **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;** The project will not increase the rate or amount of surface runoff in a manner that would result in flooding. Drainage will continue to be conveyed to either natural drainage channels or approved drainage facilities thus the project will have a less than significant impact.
 - iii. **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;** or The project will not contribute nor create runoff water which would exceed the capacity of stormwater drainage systems. All drainage will continue to be conveyed to either natural drainage channels or through approved drainage facilities, thus the project will have a less than significant impact.
 - iv. **impede or redirect flood flows?** The project will not impede or redirect existing flood flows, nor does it propose any changes. drainage will continue to be conveyed to either natural drainage channels or approved drainage facilities thus the project will have a less than significant impact.
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? - No Impact** - The proposed project will not contribute nor create runoff water and drainage will continue to be conveyed to either natural drainage channels or approved

drainage facilities. Additionally, the project is not located within any tsunami or seiche zones. Therefore, the proposed project will have no impact.

- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? - No Impact** - The proposed project is not part of nor will it interfere with any water quality control plan or groundwater management plan. Therefore, the project will have no impact.

XI. LAND USE AND PLANNING – Would the proposal:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Background:

The Open Space zone, where the proposed project is located, is intended to provide open spaces for the preservation of natural resources, managed production of resources, outdoor recreation, the protection of public health and safety, and the preservation of natural scenic areas for the existing and future population. The project proposes the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail which complies with the intent of the established zone.

XI. LAND USE AND PLANNING IMPACTS AND DISCUSSION:

- a) Physically divide an established community? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge along with the installation of new decking to serve as a multimodal pathway for non-motorized users. The project does not propose new infrastructure such as major roadways, water supply systems, or utilities to the area that will physically divide an established community. Therefore, the proposed project will not disrupt or divide the established community.
- b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? - No Impact** - The proposed project is consistent with the City of Holtville General Plan and Land Use Plan which provide for recreation activities along the Alamo River corridor. The proposed project is located within an Open Space zone which is intended to provide open spaces for the preservation of natural resources, managed production of resources, outdoor recreation, the protection of public health and safety, and the preservation of natural scenic areas for the existing and future population. The project furthers the intent of the City of Holtville Zoning Ordinance and General Plan and will comply with all local and state development standards. Therefore, the project will not conflict with any applicable land use plan, policy or regulation of any agency with jurisdiction.

XII. MINERAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Background:

There are no known mineral resources delineated in a United States Geological Survey (USGS) database search of the project area, or in the Holtville or Imperial County General Plan.

XII. MINERAL RESOURCES IMPACTS AND DISCUSSION:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? - No Impact** - Known mineral resources for the Imperial Valley are gold and gypsum as well as limestone, pumice, clay stone, sand, and gravel. Mining operations are in the Glamis Plateau area and the Cargo Muchacho Mountains located more than thirty (30) miles from the project site. According to the Imperial County General Plan's survey of mineral and soil resources, there are no known mineral resources that would be of value to the region and state at the project site. Therefore, the project will have no impact.
- b) **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other and use plan? - No Impact** - There are no locally important mineral resource recovery sites delineated on any local plans in or near the vicinity of the proposed project site. Therefore, the project will have no impact.

XIII. NOISE – Would the project result in:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?				X

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
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Background:

Noise is expected to occur at the project site during construction, however there are no sensitive receptors that would be affected in close proximity, the closest single-family residence would be a quarter of a mile away. Construction is estimated to take approximately two (2) months to complete. Post construction, there is no anticipated noise that would be in excess of the established thresholds found the Holtville General Plan as motorized vehicles are not permitted on the Alamo River Trail.

XIII. NOISE IMPACTS AND DISCUSSION:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? - No Impact** - The proposed project will consist of a non-motorized multi-use trail leading up to the deck of the trestle bridge. The trail will not include any noise-generating equipment and surrounding land uses are not considered noise sensitive. Additionally, motorized vehicles are restricted on the Alamo River Trail which will connect to the trestle bridge and thus is not anticipated to generate noise that would be in excess of the established thresholds found in the Holtville General Plan. Therefore, there will be no impact.
- b) **Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels? - No Impact** - The project does not propose any land uses that can expose people to or generate excessive ground borne vibration or ground borne noise levels on-site such as mass transit, major roadways, or intensive extractive industry. Therefore, the project will have no impact.
- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise? - No Impact** - The proposed project is not located within the vicinity of a private airstrip or land use plan nor is it within two miles of a public airport. Therefore, the proposed project would not result in a substantial permanent increase in existing ambient noise levels in the proposed project vicinity.

XIV. POPULATION AND HOUSING – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
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Background:

The proposed project does not incorporate any housing nor is it inducing growth. The project is proposed in an Open Space zone and is surrounded by nonresidential uses. Therefore, the proposed project would not induce population growth or displace people necessitating housing.

XIV. POPULATION AND HOUSING IMPACTS AND DISCUSSION:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other public infrastructure)? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The project does not propose the construction of any new housing developments, nor does it involve the construction or extension of any new utility services. Furthermore, the proposed project is located within an open space zone which does not permit residential uses. Therefore, the proposed project will have no impact.
- b) **Displace substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The project does not propose the demolition or replacement of any new housing developments. Furthermore, the proposed project is located within an open space zone which does not permit residential uses. Therefore, the proposed project will have no impact.

XV. PUBLIC SERVICES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: 1) Fire protection? 2) Police protection? 3) Schools? 4) Parks? 5) Other public facilities?				X

Background:

Impacts on public services are limited to annual maintenance activities to clear any overgrown brush or debris from the bridge and trail area to ensure public safety and fire prevention. No impact is expected since the project will not result in any physical alteration to current government facilities.

XV. PUBLIC SERVICES IMPACTS AND DISCUSSION:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times or other performance objectives for any of the public services:

- 1) Fire protection? - No Impact** - Although the trestle bridge walkway and Alamo River Trail will be accessible to the public, the people utilizing the trail are expected to be the same ones currently utilizing the existing portions of the trail. Thus, the demand for fire prevention services is expected to be the same and there will be no need for new fire facilities. Therefore, the project will have no impact.
- 2) Police protection? - No Impact** - The proposed opening of the trestle bridge for pedestrian use and extending of the Alamo River Trail to connect to said bridge is not expected to increase the demand for law enforcement facilities. Therefore, there will be no impact.
- 3) Schools? - No Impact** - The proposed project will have no impact on population growth and does not involve the development of new housing. No increase in the demand of school facilities or services is anticipated. Therefore, there will be no impact.
- 4) Parks? - No Impact** - While the new portions of the trail developed by the proposed project will require maintenance, the maintenance will be minor and can be added to the existing maintenance schedule for the Alamo River Trail. Therefore, the project will have no impact.
- 5) Other Public Facilities? - No Impact** - Development of the proposed project does not have the potential of significantly increasing demand for any other public facilities including, but not limited to, public libraries, medical facilities, or public works services as no such services are expected to be extended. Therefore, there will be no impact on existing public facilities as a result of this project.

XVI. RECREATION – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Background:

The proposed project plans to add to the current recreational facilities of the City of Holtville. As it is not population-inducing, there would be a positive impact on recreation and will alleviate some of the demand for existing facilities. As the proposed project will be part of the Alamo River Trail project, it will connect to the existing Phase I and future Phase II of the trail project totaling an estimated trail length of 3.0 miles. All trail and bridge repairs and improvements will be planned in compliance with all State and Local development standards.

XVI. RECREATION IMPACTS AND DISCUSSION:

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated? - No Impact** - The proposed project will not increase population nor have a negative impact on the current service demand levels of existing recreational facilities and parks. The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail which may alternately alleviate some of the existing demands to local parks and recreational facilities. Therefore, there will be no significant adverse impact to the environment.
- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? - Less Than Significant Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The proposed project does not propose any recreational facilities other than the improvements to the existing Alamo River Trail. Therefore, the proposed project will have a less than significant impact.

XVII. TRANSPORTATION – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?			X	
c) Substantially increase hazardous due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

Background:

The proposed project is anticipated to generate up to thirty (30) users a day, the majority of which will be local; thus it is conservatively estimated that a maximum parking demand of thirty per day would be created and generate a maximum of sixty (60) vehicle trips daily during peak season and peak hours of

operation. As parking facilities were established, approximately 500 feet from the trestle bridge, during Phase I of the Alamo River Trail, it is anticipated that users will use those facilities when utilizing the trail. Thus, the proposed project will not result in a significant traffic impact as there are sufficient parking spaces. The pedestrian walkway will be designed for non-motorized users such as pedestrians and cyclists, comply with State Standards, and have no adverse impacts to local policies and regulations.

XVII. TRANSPORTATION AND TRAFFIC IMPACTS AND DISCUSSION:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? - No Impact** - The proposed project will not conflict with any circulation program, plan, ordinance, or policy. Rather than conflict, the project furthers program number 6 of the Circulation Element of the 2017 General Plan which consists of developing a pedestrian and bicycle network with the goal of connecting public, residential, and business areas within the City of Holtville. Furthermore, the proposed project will not cause the traffic impact threshold guidelines established by the State or City of Holtville to be exceeded. Therefore, the project will have no impact. While the project is expected to have no impact, the following mitigation measures are being implemented to account for any vehicle or combination of vehicles of a size or weight exceeding the maximum limitations from the California Vehicle Code operating or moving through State Route 115 during the project's construction phase.

Mitigation Measures:

TRANSP-1: Department of Transportation Hauling/Traffic Permit

Prior to the start of any construction activities, the City shall acquire a permit from the Department of Transportation to operate or move a vehicle or combination of vehicles or special mobile equipment, of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code, on State Route 115 or any other facility under the jurisdiction of the Department of Transportation.

Timing/Implementation: Prior to Construction/City of Holtville

Enforcement/Monitoring: City of Holtville

TRANSP-2: Department of Transportation Encroachment Permit

Should any work within the Department of Transportation Right-of-Way be required for the project, the City shall acquire an encroachment permit from the Department of Transportation prior to the start of construction activities within their Right-of-Way.

Timing/Implementation: Prior to Construction/City of Holtville

Enforcement/Monitoring: City of Holtville

TRANSP-3: Perpetuation of Monuments

Per Business and Profession Code 8771, perpetuation of survey monuments shall be carried out by a licensed land surveyor should any existing monuments be destroyed by construction activities related to the project.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville

- b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? - Less Than Significant Impact** - Although the portion of the public to be utilizing the portions of the project are expected to be the same users in the Alamo River Trail, a conservative assumption that fifteen (15) to thirty (30) vehicles per day will drive to utilize the trail. It is anticipated that most users will be local walking or riding from dwelling units. The project is a part of the existing

Alamo River Trail which has a vehicle staging area 500 feet from the trestle bridge at Earl Walker Park accessed via State Highway 115. While the project will open the bridge for pedestrian use, the City expects the number of vehicles traveling to the project to be the same vehicles already utilizing Phase I of the Alamo River Trail where the vehicle staging area is located. Fifteen (15) parking spaces are provided at the nearby Phase I staging area at Earl Walker Park accessed by State Highway 115. Conservatively, it was assumed that the staging area would, at maximum, fill to capacity twice daily, thus servicing 15 to 30 vehicles per day. Two vehicle trips were assumed (one inbound trip and one outbound trip) for a maximum of 60 trips. For purposes of the traffic impact assessment, a conservative trip generation rate was assumed, it is anticipated that recreational trips will increase to these maximums seasonally during fall, winter and spring and primarily during weekends. The proposed project will not result in a significant traffic impact to the existing road network, capacity, and level of service. Thus, any traffic impact would be less than significant impact.

- c) **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? - No Impact**
- The proposed project does not consist of any sharp curves, dangerous intersections, or incompatible uses. The project will comply with the Americans with Disabilities Act and restrict the use of motorized vehicles. Therefore, the project will have no impact.
- d) **Result in inadequate emergency access? - No Impact** - The proposed project will use existing access points and comply with all federal, state, and local standards for emergency access. Therefore, the project will have no impact.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 				X

Background:

Access to the California Historical Resources was made in November 2024 and did not list any historical resources. Additionally, two Cultural Resource Surveys, completed in 2017 and 2022, did not identify any historical resources eligible for the California or National Register at or near the proposed project site. While no historical resources were identified, the City of Holtville will submit a copy of the draft initial study to the Native American Heritage Commission (NAHC) for review and distribution. Should any comments or requests for consultation be received, the City of Holtville will incorporate the comments as a mitigation measure and coordinate with any request for consultation.

XVIII. Tribal Cultural Resources Impacts and Discussion:

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or - No Impact** - Access to the California Historical Resources was made in November 2024 and did not list any historical resources. Additionally, two Cultural Resource Surveys, completed in 2017 and 2022, did not identify any historical resources eligible for the California or National Register at or near the proposed project site.
- ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision I of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision I of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. - No Impact** - As previously mentioned, neither the California Historical Resources database nor the two Cultural Resource Surveys identified any cultural or historic resources at or near the project site.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
e) Comply with federal, state, and local statutes and regulations related to solid waste?				X

Background:

The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. While the proposed landscaping will require irrigation, an existing irrigation line running parallel to the project site will be utilized. No other utilities or service systems will be utilized.

XVI. UTILITIES AND SERVICES SYSTEMS IMPACT DISCUSSION:

- a) **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. All landscaping will be irrigated via an existing irrigation line running parallel to the trail. As such no new water or wastewater facilities will be constructed or extended. The project does not propose any new construction or expansion of wastewater services. Thus, there will be no impact.
- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? - No Impact** - The proposed project will utilize an existing irrigation line running parallel to the Alamo River Trail and will thus have sufficient water supply for irrigation purposes year-round. The project will not utilize any additional water supplies outside of irrigation purposes, nor will it require the construction or expansion of water services. Thus, there will be no impact.
- c) **Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? - No Impact** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The project will not utilize any wastewater, nor does it propose the construction or expansion of wastewater services. Thus, there will be no impact.
- d) **Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? - No Impact** - The proposed project will be connected to the existing Alamo River Trail which has both trash and recyclable receptacles located throughout the trail. Additional trash and recyclable receptacles will be installed along the improved portions of the trail. The Holtville Disposal Site accommodates solid waste disposal for the Holtville community and has sufficient capacity to accommodate the project's solid waste.
- e) **Comply with federal, state, and local statutes and regulations related to solid waste? - No Impact** - The collection and disposal of solid waste from the project site and staging areas will be conducted in compliance with the County wide Integrated Waste Management Plan. Furthermore, the proposed project will comply with all Federal, State, and local statutes and regulations related to solid waste and will therefore have no impact.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

Background:

According to the Imperial County General Plan Seismic and Public Safety Element (Imperial County 2016) the potential for a major fire in the unincorporated areas of the County of Imperial is generally low (page 16). The City of Holtville General Plan Safety Element also states that "wildfires do not pose much of a risk to Holtville" (City of Holtville 2017, page 111).

XX. WILDFIRE:

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan? - No Impact** - The proposed project is located on the southwestern edge of the City of Holtville adjacent to unincorporated Imperial County. The proposed project is adjacent to Highway 115 and is not anticipated to interfere or disrupt Highway 115 during or after construction. Furthermore, the proposed project is not part of any adopted emergency evacuation plan thus it will not impair or physically interfere with an emergency response plan or emergency evacuation plan. Therefore, the project will have no impact.
- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? - No Impact** - The proposed project will not contain, handle, or store any potential sources of chemicals or compounds that would present a significant risk of accidental explosion or release of hazardous substances. Therefore, the project will have no impact
- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may**

exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? - No Impact - As previously noted, the proposed project is located on the southwestern border of the City Limits. No wildlands are located near the project site. Additionally, the proposed project does not include the installation or maintenance of roads, fuel breaks, emergency water sources, power lines or other utilities as the project is proposing to connect and maintain an existing PVC main line for the irrigation of the proposed landscaping. Therefore, no impact would occur with regard to the installation or maintenance of infrastructure that may result in temporary or ongoing impacts to the environment.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? - Less Than Significant Impact** - The proposed project is located adjacent to and over the Alamo River. The project area leading up to the bridge and the Trestle Bridge have a sloped topography which may cause a significant risk for downslope flooding. To mitigate this issue, fiber rolls held in place by stakes will be placed along the face of the slope where it transitions into a steeper slope. The rolls will reduce the erosion potential of stormwater on long or steep slopes by helping to slow, filter and spread overland flows. Additionally, gravel shoulders will be installed parallel to the trail walkway to help redirect runoff from the trail and into native drainage patterns and approved drainage facilities. By implementing the fiber rolls and gravel shoulders, the project will have a less than significant impact.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
	Potentially Significant Issues	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

Background:

The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. Construction is estimated to take approximately two (2) months to complete. This Initial Study provides the potential for degradation to the existing quality of the environment and the potential to cause substantial adverse impacts unless mitigation is incorporated. It allows for areas of concern to be mitigated in order for impacts to be less than what they could be should mitigation not be incorporated. The proposed project is not expected to impact the environment once mitigation is in place.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines?

- a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? - Potentially Significant Unless Mitigation is Incorporated** - The proposed project could have the potential to significantly impact the environment because it has the potential to impact wildlife and cultural resources during construction, however, mitigation measures BIO 1-13 and CR 1-10 have been put in place that would reduce the impacts to less than significant.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) -**

Less Than Significant Impact - The proposed project will be part of the City of Holtville Alamo River Recreation Trail. While Phase I of the Alamo River Trail project has been completed and will connect to the proposed trestle bridge walkway, Phase II of the trail project is still in the planning phase and would extend the existing trail to the City of Holtville Wetlands located approximately three quarters of a mile north of the trestle bridge project. Phase II of the Alamo River Trail project will consist of "grubbing" (removing the brush and vegetation), excavation and the planting of reeds and other hydrophilic vegetation that are used to remove nutrients from the water. Thus, it has been determined that the project could have a cumulatively adverse effect, however the proposed mitigation measures will reduce potential negative effects.

- c) **Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly? - Potentially Significant Unless Mitigation is Incorporated** - The proposed project does have the potential to adversely affect humans via air quality during construction. Therefore, mitigation measures AQ 1 and AQ 2 will be implemented to reduce the impacts to be less than significant.

SOURCE REFERENCES

The following documents were used as sources of factual data and are hereby incorporated as part of this Environmental Checklist. Because of the voluminous nature of the documents, copies of the following are not distributed with these documents but may be obtained from the City of Holtville at 121 West Fifth Street in Holtville, California.

A	City of Holtville Zoning Ordinance, 2011
B	City of Holtville General Plan, and Land Use Plan Update 2017
C	City of Holtville Service Area Plan, 2017
D	Imperial County General Plan, 1993
E	Imperial County Zoning Map 4, 2006
F	California Native Plant Society Database
G	United States Geological Survey Interactive Fault Map
H	Imperial County Air Pollution Control District CEQA Air Quality Handbook
I	United States Geological Survey Mineral Resources Database
J	California Environmental Protection Agency Air Quality Board, California Ambient Air Quality Standards (CAAQS), PM 2.5/PM 10
K	California Department of Toxic Substances Council Envirostor Database
L	United States Environmental Protection Green Book Non-Attainment Areas
M	FEMA 100 Year Flood Plain Map
N	Barret's Biological, Biological Resources Technical Report. June 2016
O	Brian F. Smith and Associates, Inc., A Phase I Cultural Resources Survey For The Holtville Wetlands Trail Link Project. July 19, 2016
P	Brian F. Smith and Associates, Inc. Historic Resources Mitigation Measures for the Holton Interurban Railway Alamo River Trestle Bridge as Part of the Holtville Wetlands Trail Link Phase 2 Project, January 31, 2022
Q	California Department of Conservation, Farmland Mapping and Monitoring Programs, 1982
R	Office of Historic Preservation California Historical Resources List, December 2024



CITY OF HOLTVILLE

Errata and Mitigation Monitoring and Reporting Program

For the Final Initial Study/Mitigated Negative Declaration

Alamo River Trestle Bridge SCH# 2024121192

Prepared By:

City of Holtville
Planning & Building Department
121 West 5th Street
Holtville, CA 92243
760-337-3883

April 2025

Table of Contents

1.0	Introduction	4
1.1	Introduction/Overview	4
2.0	Comments and Response to Comments	5
2.1	Introduction	5
2.2	List of Commenters	5
2.3	Requirements for Responding to Comments	5
2.4	Comments and Response to Comments	6
2.5	Letter 1 – City of Holtville Response to Comments	9
2.6	Letter 2 – City of Holtville Response to Comments	14
2.7	Letter 3 – City of Holtville Response to Comments	42
3.0	Errata and Changes to the Draft IS/MND	57
3.1	Revisions	57
4.0	and Monitoring Reporting Program	71
4.1	Mitigation Monitoring and Reporting Requirements	71
4.2	Mitigation Monitoring and Reporting Procedures	72

1.0 Introduction

1.1 Introduction/Overview

The Alamo River Trail Trestle Bridge was constructed around circa 1904 with a length of about 350 feet, is an open deck bridge consisting of several short spans and is supported by a system of splayed vertical structural elements. A particular feature of this trestle is the apparent composite of both a timber bent system at both ends and a steel space truss system in the middle. The steel truss occupies the mid one-third of the length of the trestle and is bolted with rivet type connections. The steel rails have long been removed by A & K Railroad Materials for salvage use. As such, the remaining transverse timber beams, spaced at about 2 to 3 feet on center, form the current main top surface of the deck. These transverse beams are about 7-1/2 inch wide by 9-1/2 inch deep over the longitudinal wood girders and increase to 9-1/2 by 16 inches over the top chords of the steel truss. On each end of the transverse beams, a 3-foot-wide metal grating sidewalk supported by double cantilevered wood rafters provides access and adds to the total width of the trestle top deck. A set of 3'-6" tall vertical metal angles at about 3' on center are bolted to the tips of the double cantilevers to form a handrail system with horizontal cables. In August of 2009 a fire occurred in the vicinity of the trestle bridge which resulted in significant damage. A 2010 visual review of the trestle bridge found that the deck, support cross beams, grating, railings, and bents were completely damaged and in need of full replacement.

The trestle bridge repair will result in the replacement of the damaged structural bent timbers, structural cross beams, and other structural components. More specifically, the rehabilitation will consist of the demolition and replacement of the damaged portions of the bridge (approximately 1,000 square feet), and the installation of 3,500 square feet of bridge decking suitable for non-motorized trail users, 350 linear feet of Americans with Disabilities Act (ADA) compliant bridge railings suitable for pedestrians and bicycles, and 350 square feet of bridge landing suitable for the transition between the bridge and the existing Alamo River Trail. The damaged structures will be replaced with timber, when feasible, to match the nondamaged portion of the bridge and restore the aesthetic appeal of the bridge. Of the eighteen (18) bents that act as key support systems and hold up the bridge deck between spans, only one bent located on the river bank approximately twenty-six (26) feet west of the river bed will be replaced. No work will be conducted on the river bed. The improvements will result in the repair and conversion of the existing trestle bridge into a multimodal pathway suitable for non-motorized users including pedestrians, bicycles and equestrian traffic.

The project will also include improvements to the existing Alamo River Trail aimed at extending the trail to connect to the trestle bridge walkway. The trail improvements will consist of an 8-foot wide, 12 inch deep, class 2 base trail continuation section from the

east edge of the Alamo River Bridge to the existing 8-foot-wide plain cement concrete trail. Additional improvements include trail side amenities consisting of 45,000 square feet of mulch, fifteen (15) trees from fifteen (15) gallon containers, thirty-five (35) each of bushes, shrubs, and grasses, six (6) benches, two (2) informational kiosks, four (4) “No Motor Vehicles” signs, and one (1) funding acknowledgement sign. All proposed landscaping will comply with the State Model Water Efficient Landscape Ordinance (MWELO) and have its own irrigation consisting of drip fittings and tree bubblers.

2.0 Comments and Response to Comments

2.1 Introduction

This chapter includes all comments received on the draft IS/MND during the 30-day public and agency review period. No new significant environmental impacts or issues, beyond those already identified in the draft IS/MND for the Alamo River Trestle Bridge were raised during the public review period. Acting as lead agency under CEQA, the City of Holtville directed responses to the comments received on the draft IS/MND.

2.2 List of Commenters

The following individuals and representatives of organizations and agencies submitted written comments on the draft IS/MND.

Table 1. List of Commenters on the Draft IS/MND

Comments Received by the City of Holtville			
No.	Individual or Signatory	Affiliation	Date
1	Kimberly D. Dodson, GISP, Branch Chief	California Department of Transportation	January 23, 2025
2	Ismael Garcia, Environmental Coordinator	Imperial County Air Pollution Control District	January 28, 2025
3	Brandy Wood, Environmental Program Manager	California Department of Fish and Wildlife	January 31, 2025

2.3 Requirements for Responding to Comments

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the IS/MND and prepare a written response. CEQA Guidelines Section 15088 also recommends that where the response to comments results in revisions to the IS/MND, those revisions should be noted as a revision to the IS/MND or in a separate section of this Errata and Mitigation Monitoring and Reporting Program. Revisions are reflected in the Errata, Section 3.0 of this document.

2.4 Comments and Response to Comments

Written comments on the draft IS/MND are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the letters are coded using numbers (e.g., Comment Letter 1) and each issue raised in the comment letter is assigned a number that correlates with the number (e.g. 1-1, 1-2, 1-3, etc.).

Where changes to the draft IS/MND text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text). Comment-initiated text revisions to the draft IS/MND and minor staff-initiated changes are compiled in their entirety and are demarcated with revision marks in Chapter 3.0, Errata, of this Revised IS/MND.

**Letter 1 - California Department of Transportation, Kimberly D. Dodson,
(Pg. 1 of 2)**

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



January 23, 2025

11-IMP-115
PM 10.5

Alamo River Trail Trestle Bridge
MND/SCH#2024121192

Mr. Nicholas Wells
City Manager
City of Holtville
121 West 5th Street
Holtville, CA 92250

Dear Mr. Wells:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mitigated Negative Declaration for the Alamo River Trail Trestle Bridge located near State Route 115 (SR-115). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans has the following comments:

Hauling/Traffic Control Plan

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network.

Additional information is provided online at:

<http://www.dot.ca.gov/trafficops/permits/index.html>

"Improving lives and communities through transportation."

**Letter 1 - California Department of Transportation, Kimberly D. Dodson,
(Pg. 2 of 2)**

Mr. Nicholas Wells, City Manager
January 23, 2025
Page 2

Potential impacts to the highway facilities (Route 115) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

1-2

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

1-3

- require a Caltrans Encroachment Permit
- have completed the Caltrans Local Development Review (LDR) process.
- have an approved environmental document.

Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Shannon Aston, LDR Coordinator, at (619) 992-0628 or by e-mail sent to shannon.aston@dot.ca.gov.

1-4

Sincerely,

Rogelio Sanchez for

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review

2.5 Letter 1 – City of Holtville Response to Comments

Response to Comment 1-1: The comment provides introductory remarks and a description of the Department of Transportation's strategic goals. Since the comment does not address the adequacy of the environmental analysis, no changes to the Revised IS/MND in response to this comment is necessary.

Response to Comment 1-2: The comment explains that the Department of Transportation has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The comment further states that potential impacts to the highway facilities (Route 115) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins. This comment has been noted, and mitigation measure TRANSP-1 was added to the Revised IS/MND which states the following:

TRANSP-1: Department of Transportation Hauling/Traffic Permit

Prior to the start of any construction activities, the City shall acquire a permit from the Department of Transportation to operate or move a vehicle or combination of vehicles or special mobile equipment, of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code, on State Route 115 or any other facility under the jurisdiction of the Department of Transportation.

Response to Comment 1-3: The comment explains that any work performed within the Department of Transportation's Right-of-Way will require discretionary review and approval by the Department of Transportation and an encroachment permit will be required for any work within their Right-of-Way prior to construction. The comment further states that perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction. This comment has been noted, and mitigation measures TRANSP-2 and TRANSP-3 were added to state the following:

TRANSP-2: Department of Transportation Encroachment Permit

Should any work within the Department of Transportation Right-of-Way be required for the project, the City shall acquire an encroachment permit from the Department of Transportation prior to the start of construction activities within their Right-of-Way

TRANSP-3: Perpetuation of Monuments

Per Business and Profession Code 8771, perpetuation of survey monuments shall be carried out by a licensed land surveyor should any existing monuments be destroyed by construction activities related to the project.

Response to Comment 1-4: The comment provides the commenter's phone number and email address for additional information regarding the comment letter. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Letter 2 – Imperial County Air Pollution Control District, Ismael Garcia, (Pg. 1 of 3)

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850



TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

January 28, 2025

Jorge Galvan, Consultant Planner
The Holt Group, Inc.
1601 North Imperial
El Centro, CA 92243

SUBJECT: Notice of Intent to Adopt a Draft Initial Study/Mitigated Negative Declaration for the City of Holtville Alamo River Trail Trestle Bridge Project

Dear Mr. Galvan,

The Imperial County Air Pollution Control District (Air District) would like to thank you for the opportunity to review and comment on the Notice of Intent (NOI) to adopt a Draft Initial Study (IS) and Mitigated Negative Declaration (MND) for the City of Holtville's Alamo River Trail Trestle Bridge Project (Project). The project proposes the demolition and replacement of approximately 1,000 square feet to repair the damaged portions of the bridge, installation of 3,500 square feet of decking, 350 linear feet bridge railings, and 350 square feet of bridge landing. The project will also include improvements consisting of an 8-foot wide, 12 inch deep, class 2 base trail section and additional landscaping improvements, benches, kiosks, and signage. The project is located within the 5.91 acre parcel identified with Assessor's Parcel Number 045-243-005.

2-1

The draft Initial Study determines some impacts of the project on Air Quality are "Potentially Significant Unless Mitigation Incorporated" and identifies Mitigation Measures AQ-1 and AQ-2 as stated below:

Mitigation Measures

AQ-1: Dust Control Plan

The contractor shall submit a Dust Control Plan identifying all sources of PM10 Emissions to ICAPCD for approval. Construction of the project site will be subject to the requirements of ICAPCD Rule 800, Fugitive Dust Requirement for control of fine particulate matter (PM10).

2-2

- Inactive Construction Areas: Apply non-toxic soil stabilizers, dust suppressants, tarps, or other suitable material to all inactive construction areas. Visible emissions shall be limited to 20% opacity for dust emissions.

Letter 2 – Imperial County Air Pollution Control District, Ismael Garcia, (Pg. 2 of 3)

- Active Site Area: Water active site areas twice daily or as needed to comply with Regulation VIII.
- Storage Piles: Control dust for material storage piles by either enclosing, covering and watering twice daily or as needed to comply with Regulation VIII. Outdoor storage of fine particulate material is prohibited.
- Hauling: All trucks hauling dirt, sand, soil, or other loose materials shall be covered, unless six inches of freeboard space from the top of the container is maintained with no spillage. In addition, the cargo compartment of all haul trucks is to be cleaned or washed at the delivery site after removal of bulk material.
- Adjacent Roadways: Pave permanent roads as quickly as possible to minimize dust. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the project site. Sweep streets at the end of the day.
- Unpaved Roads and Parking/Staging Areas: Apply water three times daily, dust suppress or chemically stabilize with non-toxic soils all unpaved roads and parking. Visible emissions shall be limited to 20% opacity.
- Speed Limit: Traffic speeds on unpaved roads shall be limited to 5 miles per hour.
- Construction Roadways: Pave construction roads that have a traffic volume of more than 50 daily trips. Access roads leading into the construction site shall be paved at least 25 feet from the main road.
- Disturbed Areas: When active construction ceases on the site, replace ground cover as quickly as possible.
- Track Out or Carry Out: Track out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.

2-2

AQ-2: Air Quality Measures

The Applicant shall ensure the following air quality measures are shown on applicable grading permits:

- a. Construction of the project site will be subject to the requirements of the Imperial County Air Pollution Control Standard Mitigation Measures for Construction Combustion Equipment:
 - Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment.
 - Minimize idling time either by shutting equipment when not in use or reducing the time of idling to 5 minutes as a maximum.
 - Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use.

2-3

Letter 2 – Imperial County Air Pollution Control District, Ismael Garcia, (Pg. 3 of 3)

- Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).
 - Maintain all construction equipment in proper tune according to manufacturer's specifications; fuel off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generators sets, compressors, with ARB certified motor vehicle diesel fuel.
- b. To provide a greater degree of reduction of PM10 emissions from construction combustion equipment per Air Pollution Control District recommendations, the project shall curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways.
- c. The proposed project shall further implement activity management (e.g. rescheduling activities to reduce short-term impacts).

2-3

While the document did not include any Air Quality Impact Modelling for review the Air District can concur that Mitigation Measures AQ-1 and AQ-2 are consistent with mitigations that maintain the impacts of this type of project below significance.

2-4

The document and mitigation measures correctly state the project must comply with Regulation VIII and the Air District reminds the applicant that the project must comply with all Air District Rules and Regulations.

For your convenience, the Air District's rules and regulations are available via the web at <https://apcd.imperialcounty.org/rules-and-regulations/>. Please feel free to call our office at (442) 265-1800 or contact us through email if you have any additional questions or concerns.

2-5

Respectfully,



Ismael Garcia
Environmental Coordinator



Reviewed by
Monica Soucier
APC Division Manager

2.6 Letter 2 – City of Holtville Response to Comments

Response to Comment 2-1: The comment provides introductory remarks and a description of the Alamo River Trestle Bridge Project. The comment further states that the Draft IS/MND implemented mitigation measures AQ-1 and AQ-2. Since the comment does not address the adequacy of the environmental analysis, no changes to the Revised IS/MND in response to this comment is necessary.

Response to Comment 2-2: The comment provides a detailed description of mitigation measure AQ-1: Dust Control Plan from the draft IS/MND. No additional information or comments are provided. Since the comment does not address the adequacy of the environmental analysis, no changes to the Revised IS/MND in response to this comment is necessary.

Response to Comment 2-3: The comment provides a detailed description of mitigation measure AQ-2: Air Quality Measures from the draft IS/MND. No additional information or comments are provided. Since the comment does not address the adequacy of the environmental analysis, no changes to the Revised IS/MND in response to this comment is necessary.

Response to Comment 2-4: The comment states that while the document does not provide any air quality modelling, mitigation Measures AQ-1 and AQ-2 from the Draft IS/MND are consistent with mitigations that reduce the impacts from the type of project to below significant. The comments also provide a reminder that the project must comply with all Imperial County Air Pollution Control District rules and regulations. This comment has been noted, and minor edits to the description on the Air Quality section of the Revised IS/MND were added to stipulate compliance with all Imperial County Air Pollution Control District rules and regulations.

Response to Comment 2-5: The comment provides the commenter's phone number, email address, and a web link for additional information regarding the comment letter. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 1 of 27)



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



January 31, 2025
Sent via email

Nicholas D. Wells, City Manager
City of Holtville
121 West 5th Street
Holtville, CA 92250

Dear Mr. Wells:

ALAMO RIVER TRAIL TRESTLE BRIDGE PROJECT (PROJECT)
MITIGATED NEGATIVE DECLARATION (MND)
SCH# 2024121192

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the City of Holtville 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.

PROJECT DESCRIPTION SUMMARY

Proponent: The Holt Group, Inc.

Objective: The objective of the Project is to rehabilitate the Alamo River Trail Trestle Bridge and make improvements to the Alamo River Walking Trail. Primary Project activities include demolition and replacement of the damaged portions of the bridge (approximately 1,000 square feet), and the installation of 3,500 square feet of bridge decking suitable for non-motorized trail users, 350 linear feet of Americans with Disabilities Act compliant bridge railings suitable for pedestrians and bicycles, and 350 square feet of bridge landing suitable for the transition between the bridge and the existing Alamo River Trail. The damaged structures will be replaced with timber, when feasible, to match the nondamaged portion of the bridge and restore the aesthetic appeal of the bridge.

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.

3-1

3-2

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 2 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 2 of 20

Location: Holtville, CA, Imperial County, north of Highway 115 and over and east of the Alamo River at APN 045-243-005 and at Latitude 32.8081042, Longitude -115.3881899.
Timeframe: Unknown

3-2

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Holtville in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Project Description and Related Impact Shortcoming

Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

COMMENT 1:

Project Description, Pages 1-2

Issue: The Project Description does not specify if Project activities will occur in the Alamo River.

Specific impact: If Project activities will impact resources in the Alamo River, the City of Holtville will need to notify for a Lake or Streambed Alteration Agreement (LSA), and if deemed necessary by CDFW, be issued a Streambed Alteration Agreement and avoid, minimize, and mitigate the impacts to the Alamo River's bed, bank, or channel, and the resources that rely upon it.

Why impact would occur: Potentially significant impacts to Alamo River's resources could occur due to lack of proposed avoidance, minimization, and mitigation measures.

3-3

Evidence impact would be significant: California places great value on streams and the resources they provide. Notification is required, pursuant to CDFW's LSA Program (Fish & G. Code, § 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA (Pub. Resources Code section 21000 et seq.) as the Responsible Agency.

Recommended Edits to Project Description and Related Impact Shortcoming: If the Project will impact resources subject to Fish and Game Code section 1602, CDFW recommends the MND's Project Description describes these activities and includes avoidance, minimization or mitigation measures to ensure the Project impacts are reduced to a less than significant level. If the Project will not impact resources subject to Fish and Game Code section 1602, CDFW recommends the MND notes these resources will be avoided.

To reduce impacts to less than significant: If Project activities will be occurring in the Alamo River, the City of Holtville, CDFW recommends the MND require notification to CDFW for an LSA agreement pursuant to Fish and Game Code section 1602, and define the mitigation required to bring Project impacts to the Alamo River less than significant.

II. Environmental Setting and Related Impact Shortcoming

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 3 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 3 of 20

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

COMMENT 2:

Section IV, Page 15

Issue: The MND does not adequately identify the Project's potentially significant impacts to biological resources.

Specific impact: The MND states:

"A formal biological survey was conducted in June of 2016 for the City of Holtville Alamo River Wetlands Walking Trail Project which stretches approximately 1.3 miles from Earl Walker Park, 500 feet south of the Project site, to the City of Holtville Wetlands north of the Project site. While the survey spans the length of the proposed Alamo River Walking trail, the Trestle Bridge Project is well within the biological surveys scope given that the trestle bridge and portions of the trail to be improved are part of the overall Alamo River Trail Project. The 2016 biological survey concluded by stating that no riparian habitats nor any endangered, threatened, or species of concern would be affected (See Appendix A - Biological Report). Nonetheless, disturbance from construction activities within this area is still a possibility and recommended mitigation measures will be in place."

The general field assessment included a survey of the Project site and along the river bluff. CDFW is concerned that the timing and scope of the general field assessment in May 2016 was not sufficient to detect all special-status species. In addition, only one focused survey was performed for western burrowing owl. A single survey effort may not be sufficient to detect special-status species, and following approved guidelines and protocol-level surveys increases detection of presence. CDFW is concerned about the potential for special-status species to occur on or near the Project site due to insufficient survey efforts. Recent surveys during the appropriate times of the year are needed to identify potential impacts to biological resources; inform appropriate avoidance, minimization, and mitigation measures; and determine whether impacts to biological resources have been mitigated to a level that is less than significant.

The California Natural Diversity Database (CNDDDB) and data layers in the Biogeographic Information and Observation System (BIOS) indicate that federal Endangered Species Act-listed, CESA-listed, or other special-status species have been reported or have the potential to occur in the Project area that were not addresses in the MND, including, but not limited to, the following: Plants: Abram's spurge (*Euphorbia abramsiana*) and gravel milk-vetch (*Astragalus sabulorum*); Amphibians: Sonoran Desert toad (*Inciilius alvarius*); Birds: crissal thrasher (*Toxostoma crissale*), ferruginous hawk (*Buteo regalis*), Gila woodpecker (*Melanerpes uropygialis*), loggerhead shrike (*Lanius ludovicianus*), mountain plover (*Charadrius montanus*), northern harrier (*Circus cyaneus*), yellow warbler (*Setophaga petechia*), and Yuma Ridgway's rail (*Rallus obsoletus yumanensis*); Mammals: American badger (*Taxidea taxus*), little brown bat (*Myotis lucifugus*), Mexican free-tailed bat (*Tadarida brasiliensis*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), Yuma myotis (*Myotis yumanensis*), and western yellow bat (*Lasiurus xanthinus*).

Why impact would occur: Special-status species may not be present during an individual survey. If migratory special-status species are present during other times of the year, they could be impacted by Project activities when timelines intersect. CDFW generally considers biological 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. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a

3-4

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 4 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 4 of 20

protracted time frame, or in phases, or if surveys are completed during periods of drought.

Evidence impact would be significant: 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 assessment of the existing environmental setting with respect to biological resources has not been adequately analyzed in the MND. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the MND likely provides an incomplete or inaccurate analysis of Project-related environmental impacts and whether those impacts have been mitigated to a level that is less than significant. Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts, that special emphasis should be placed on environmental resources that are rare or unique to the region, and that significant environmental impacts of the proposed Project are adequately investigated and discussed.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

CDFW recommends the MND includes avoidance, minimization or mitigation measures to ensure the Project impacts are reduced to a less than significant level. CDFW recommends the MND be revised to include updated survey results following approved guidelines and protocols and provide an impact analysis (see Comment 2 below). If this recommendation is not accepted by the lead agency, CDFW recommends the inclusion of the following measure in the MND.

Mitigation Measure BIO-5

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish and Game Code §§ 3511, 4700, 5060, 5515), shall be completed. Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Species-specific surveys following protocols and guidelines, shall be completed by a Qualified Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Appropriate avoidance, minimization, and mitigation measures shall be developed for present species in consultation with CDFW, which may include obtaining a CESA incidental take permit (ITP).

COMMENT 3:

Appendix A – Biological Report, Page 1

Issue: Appendix A - Biological Report is outdated and evaluation of the environmental baseline should be reconducted using proper surveying guidance and protocols for all biological resources.

Specific impact: An outdated biological survey may not account for all current species and habitats present on the Project site which may lead to potentially significant impacts to special-status species and other biological resources.

Why impact would occur: Lack of identification of present biological resources and unmitigated Project activities can significantly impact special-status species through but not limited to direct mortality, destruction of foraging habitat, and/or destruction of nesting habitat.

3-4

3-5

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 5 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 5 of 20

Evidence impact would be significant: CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Also, site conditions likely have changed in the approximate 8 years since the general survey was conducted, which means the species covered in Appendix A – Biological Report may have diminished, and/or other species may have inhabited the Project site. In addition, western burrowing owls are now CESA candidate species, and take of the species without state authorization is prohibited.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

CDFW recommends the MND includes avoidance, minimization or mitigation measures to ensure the Project impacts to biological resources are reduced to a less than significant level.

To reduce impacts to less than significant: CDFW recommends the City of Holtville conduct new, species-specific biological surveys for special-status species and sensitive natural communities near the Project site following CDFW and USFWS guidelines and protocols. The MND should reflect the survey results of all special-status species and sensitive natural communities in the vicinity of the Project site and note the presence and absence of species and sensitive natural communities.

COMMENT 4:

Appendix A – Biological Report, Page 7

Issue: Appendix A – Biological Report identified cliff swallows (*Petrochelidon pyrrhonota*) near the Project site and the MND has not described potential impact nor mitigation to reduce any potential impact for these species.

Specific impact: Appendix A – Biological Report (p. 7) states, "There are swallows nesting under SR 115 bridge and there is the possibility of nesting birds in the trees found growing along the banks of the river along the walking path." As the Alamo River Trestle Bridge is in the vicinity of the SR 115 bridge, it is possible that cliff swallows may utilize the structure for nesting.

Why impact would occur: A recent survey to document species presence was not performed. Removal of the sections of the Alamo River trestle bridge can result in harm to or take of the species and/or destruction of nests. Removal and replacement of the existing Alamo River trestle bridge could also cause disturbance to cliff swallow nesting areas which can lead to nest abandonment and loss of fecundity.

Evidence impact would be significant: This Project has the ability to unintentionally destroy nests and/or eggs of cliff swallows unless proper surveys are conducted prior to Project activities. Fish and Game Code section 3503 makes it 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 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by the 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.). 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) 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. According to the Migratory Bird Treaty Act, "it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export, any migratory bird, any part, nest, or egg of any such bird etc."

3-5

3-6

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 6 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 6 of 20

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

CDFW recommends the MND includes avoidance, minimization or mitigation measures to ensure the Project impacts are reduced to a less than significant level. CDFW recommends inclusion of the following measure in the MND if cliff swallow presence is determined by updated surveys.

Mitigation Measure BIO- 6:

Swallow Nesting: Construction shall either occur outside of the swallow nesting period (generally March 15 through August 31), or the City of Holtville shall submit to CDFW, for review and approval, a Nesting Bird Avoidance Plan, prepared by a Qualified Avian Biologist which could include methods to deter swallow nesting.

COMMENT 5:

Appendix A – Biological Report, Page 5

Issue: CDFW is concerned that the MND does not sufficiently identify and evaluate potential Project impacts to bat species or ensure that impacts are reduced to a level less than significant.

Specific impact: There is a potential for bat species, such as Mexican free-tailed bat (*Tadarida brasiliensis*), Yuma myotis (*Myotis yumanensis*), and little brown bat (*Myotis lucifugus*) to occur and roost in the Project area. These species could also potentially night roost within the Alamo River trestle bridge. Additionally, bat species' maternity and winter roosting habitat is rapidly declining, and a loss of occupied habitat may be significant under CEQA. CDFW notes that in addition to multiple bat species roosting in the bridge components, there is also potential for multiple bat species, including pallid bat (*Antrozous pallidus*), to roost in cliff swallow mud-nests, which are potentially present on the bridge. Year-round occupancy of cliff swallow mud-nests by bat species has been observed throughout California, including, but not limited to, Yuma myotis (*Myotis yumanensis*), big brown bat (*Eptesicus fuscus*), Mexican free-tailed bat (*Tadarida brasiliensis*), pallid bat (*Antrozous pallidus*), and Myotis sp. (unidentified to species level) (California Bat Working Group, 2022). Several bat species use mud-nests located in or on bridges, cliffs, culverts, and other structures with a vertical surface protected by an overhang near a source of mud and with a nearby open area for foraging. They have been observed using the inside of cliff swallow nests as well as the interstitial crevices between nests or between the nest and the structure (California Bat Working Group, 2022).

Why impact would occur: Disturbance of bat roosting habitat on the Alamo River trestle bridge due to removal of damaged bridge parts can potentially impact species of bats by direct mortality, roosting disturbances, and breeding disturbances. The permanent loss of roosting habitat is considered one of the primary conservation issues for bat populations (Fenton 1997, Pierson 1998). Bats roosting in cliff swallow mud-nests could be directly impacted (i.e., injured or killed) by Project activities if they are present when these nests are removed.

Evidence impact would be significant: Take (hunt, pursue, catch, capture, or kill, or attempt to do so; Fish & G. Code §86) of nongame mammals is prohibited by Fish and Game Code §4150. Section 15070(b)(2) of the CEQA Guidelines states that one of the conditions under which a mitigated negative declaration shall be prepared is when there is no substantial evidence that the Project may have a significant effect on the environment. Therefore, CDFW recommends the City of Holtville demonstrate that all impacts to biological resources are less than significant through appropriate avoidance, minimization, and mitigation measures. Several special-status bats have the potential to occur in the Project area, including pallid bat (*Antrozous pallidus*), which is an SSC that meets the CEQA definition of a rare species (CEQA Guidelines § 15380).

3-6

3-7

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 7 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 7 of 20

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

CDFW recommends the City of Holtville demonstrate in the MND that there are no impacts to bats species, or any potential impacts are avoided, minimized, and mitigated to a level that is less than significant. CDFW reiterates the recommendation that a revised MND include the survey results of whether cliff swallow nests occur on the bridge and also include an analysis of the potential impacts to bats that may use these nests for roosting. CDFW recommends the MND includes avoidance, minimization, and mitigation measures for present bat species to ensure the Project impacts are reduced to a less than significant level. CDFW recommends inclusion of the following measure in the MND.

Mitigation Measure BIO - 7:

Prior to the start of Project activities, the City of Holtville shall retain a Qualified Bat Biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the proposed Project. Within suitable bat roosting habitat, the Qualified Bat Biologist shall conduct 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 the Qualified Bat Biologist. Surveys shall be conducted during favorable weather conditions only. 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, and to determine if night roosting is occurring in the area.

If bats are found using any trees or structures within the Project area, including the bridge and any cliff swallow nests on the bridge, the Qualified Bat Biologist shall identify the bats to the species level and evaluate the colony, if applicable, to determine its size and significance. The bat survey results shall include: 1) the exact location of all roosting sites (location shall be described and mapped); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present (including how the species was identified); 4) the location of all signs of bats (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks, and bats squeaking and chattering)(described and mapped); 5) the type of roost: maternity roost, winter roost (hibernacula), and night roost (resting at night while out feeding) versus a day roost (resting all day) must also be clearly stated; and 6) proposed avoidance and minimization measures, including avoidance of bats in swallow nests. The results of the survey shall be submitted to CDFW for review prior to initiating Project activities.

If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction within these areas shall only occur generally between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Appropriate time to start Project construction to avoid impact shall be confirmed by a Qualified Bat Biologist. Maternity roosts shall not be evicted, excluded, removed, or disturbed.

If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare

3-7

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 8 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 8 of 20

a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan prepared by the Qualified Bat Biologist shall be submitted for CDFW review and approval prior to relocation and construction activities. The Qualified Bat Biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall also be in place with sufficient timing prior to the initiation of Project-related activities to allow bat relocation, with the timing specified by the Qualified Bat Biologist with consideration of the species. Removal of roosts shall be guided by accepted exclusion and deterrent techniques developed by the Qualified Bat Biologist. The City shall compensate no less than 2:1 for permanent impacts to roosting habitat with replacement and permanent protection of roost habitat.

3-7

COMMENT 6:

Appendix A – Biological Report, Page 5

Issue: CDFW is concerned that the MND does not sufficiently identify potential Project impacts to Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), a CESA-listed threatened species, and fully protected species, or ensure that impacts are reduced to a level less than significant.

Specific impact: The Project may result in adverse impacts to this CESA-listed and state fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the City of Holtville include in the analysis how appropriate avoidance measures will be utilized to reduce direct and indirect impacts to species to a level less than significant and avoid take.

Why impact would occur: Disturbance to Yuma Ridgway's rail habitat through removal of vegetation, removal of the damaged part of Alamo River trestle bridge, and noise during Project activities can lead to significant impacts to a fully protected and threatened species.

Evidence impact would be significant: CESA prohibits the take (under Fish & G. Code, § 86, "take" means to hunt, pursue, catch, capture, or kill, or to attempt to hunt, pursue, catch, capture, or kill) of any endangered, threatened, or candidate species that results from a proposed project, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows: Take is for necessary scientific research; efforts to recover a fully protected, endangered, or threatened species; live capture and relocation of a bird species for the protection of livestock; or they are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process.

3-8

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

As Appendix A – Biological Report is out of date, CDFW recommends that protocol-level surveys be conducted to determine the presence or absence of Yuma Ridgway's rail on the Project site and a 500-foot buffer. The survey results should be included in a revised MND, along with analysis of potential adverse impacts to this CESA-listed and state fully protected species. CDFW recommends that the City of Holtville include in the analysis how appropriate avoidance measures will reduce direct and indirect impacts to species to a level less than significant. Project activities described in the MND should generally be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. To reduce impacts to

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 9 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 9 of 20

Yuma Ridgway's rail to a level less than significant, CDFW recommends that the City of Holtville include the following mitigation measure in a revised MND:

Mitigation Measure BIO-8:

Prior to the start of Project activities, a biologist who has a valid 10(a)(1)(A) Fish and Wildlife Service recovery permit and a CDFW CESA Memorandum of Understanding for Yuma Ridgway's rail shall perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project Evaluation within a 500-foot buffer of the Project. The survey requires 6 callback surveys between March 1 and May 15. If presence of Yuma Ridgway's rail is detected, Project activities that require the use of heavy equipment shall not take place during the species peak breeding season (generally February 15 to September 30). CDFW shall be notified in writing of detection of this species within three (3) days. If protocol surveys indicate this species is not present within the 500-foot buffer, Project activities may proceed subject to the other provisions of federal and state law. The results of the protocol surveys shall be provided to CDFW prior to commencement of Project activities.

3-8

COMMENT 7:

Appendix A – Biological Report, Page 5-6

Issue: The Project site potentially contains suitable habitat for western burrowing owl, a CESA-listed candidate species. Breeding surveys and non-breeding surveys were not performed for western burrowing owl.

Specific impact: The MND does not analyze or identify potential impact nor propose mitigation for any potential loss of nesting burrows, satellite burrows, foraging habitat, dispersal and migration habitat, wintering habitat, and habitat linkages, including habitat supporting prey and host burrowers, and other essential habitat attributes.

Why impact would occur: Western burrowing owls are dependent on burrows at all times of the year for survival and/or reproduction, evicting them from nesting, roosting, and satellite burrows may lead to indirect impacts or take. Loss of access to burrows will likely result in varying levels of increased stress on western burrowing owls and could depress reproduction, increase predation, increase energetic costs, and introduce risks posed by having to find and compete for available burrows (CDFG, 2012). Western burrowing owls are also dependent on adjacent habitat, and forage within 600 meters of nest burrows (Rosenberg and Haley, 2004). CDFW considers habitat to be occupied when at least one western burrowing owl, or its sign at or near a burrow entrance, is observed within the last three years (CDFG, 2012). As written, the MND only requires replacement of burrows determined to be occupied at the time of preconstruction surveys. This MND does not analyze temporal consideration of species occupancy and their use of the surrounding landscape for survival.

3-9

Evidence impact would be significant: As a candidate species, western burrowing owl is granted full protection of a threatened or endangered species under CESA. 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." CESA allows CDFW to authorize project proponents to take state-listed threatened, endangered, or candidate species if certain conditions are met. Take must be incidental to an otherwise lawful activity. The issuance of a permit cannot jeopardize the continued existence of the species, and the impacts must be minimized and fully mitigated. Similarly, take, possession or destruction of individual burrowing owls, their nests and eggs are prohibited under Fish and Game Code sections 3503, 3503.5 and 3513. Eviction of burrowing owls is a potentially significant impact under CEQA, and mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). As stated in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012), "the current scientific literature supports the conclusion that mitigation for permanent habitat loss necessitates replacement with an equivalent or greater habitat area for breeding,

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 10 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 10 of 20

foraging, wintering, dispersal, presence of burrows, burrow surrogates, presence of fossorial mammal dens, well drained soils, and abundant and available prey within close proximity to the burrow”.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming) CDFW recommends the MND identify and analyze any potential impacts to western burrowing owl, and include avoidance, minimization or mitigation measures to ensure the Project impacts are reduced to a less than significant level, which may include obtaining an incidental take permit.

To reduce impacts to less than significant:

CDFW recommends the City of Holtville perform breeding and non-breeding surveys per the guidance of the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012), assess the impact, and create a mitigation measure to include avoidance, minimization, and mitigation for burrowing owls identified on-site, and these same measures be applied to any individuals found during take avoidance surveys as conditions by the proposed mitigation measure. CDFW recommends the guidance of mitigating impacts to burrowing owls in the Staff Report on Burrowing Owl Mitigation (CDFG, 2012) be followed, including (a) permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced with permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals.

3-9

COMMENT 9:

Appendix A – Biological Report, Page 5

Issue: There is a discrepancy between the MND and Appendix A – Biological Report regarding the removal of arrow weed thickets (*Pluchea sericea* Shrubland Alliance), which is recognized by CDFW as a sensitive natural community. No avoidance, minimization, or mitigation measures are proposed for the potential impacts to arrow weed thickets.

Specific impact: Appendix A – Biological Report (p. 3) states, “Limbs and tree stumps will be removed to enhance the view of the river.” However, the MND contradicts this analysis stating, “While the Project is not proposing to remove any existing vegetation, the City will strive to avoid and minimize impacts to the vegetation to the greatest extent possible.”

Why impact would occur: No avoidance, minimization, or mitigation measures are in the MND regarding sensitive natural communities. CDFW is concerned, if Appendix A – Biological Report is accurate in the description of the Project’s disturbance activities, that there are no avoidance, minimization, or mitigation measures in the MND to ensure impacts are reduced to less than significant levels.

3-10

Evidence impact would be significant: Arrow weed thickets are listed on the CDFW Vegetation Classification and Mapping Program’s (VegCAMP) Sensitive Natural Communities Only by Life Form list (CDFW, June 2023) as a S3 state rarity ranking. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review process of CEQA.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming) Should arrow weed thickets have the potential to be impacted by the Project, CDFW recommends the MND includes avoidance, minimization or mitigation measures to ensure the Project impacts to the sensitive natural community are reduced to a less than significant level. CDFW proposes the following mitigation measure:

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 11 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 11 of 20

Mitigation Measure BIO-8:

To the greatest extent practicable, Project plans shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the City of Holtville shall restore the habitat to pre-project conditions, or compensatory mitigation for direct and permanent impacts consisting of habitat acquisition at a minimum of a 2:1 ratio. Habitat acquisition sites shall be biologically equal or superior to existing conditions and shall be conserved and managed in perpetuity.

3-10

III. Mitigation Measure or Alternative and Related Impact Shortcoming

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or USFWS?

COMMENT 9:

Section IV, Page 16

Issue: The Project may have impacts on nesting birds and their nests, including SSC and CESA-listed species.

Specific impact: Project activities may result in degradation and permanent loss of nesting bird habitat and may also result in direct mortality and/or injury to nesting birds and take of their nests onsite through trimming/removing vegetation along the Alamo River Walking Trail.

Why impact would occur: Direct take may result from vehicle and equipment strike and from predators attracted to the construction site. Indirect take may result from displacement, reduction of habitat and habitat quality, and from impacted foraging and nesting habitat. Additionally, construction during the breeding season of nesting birds could potentially result in the incidental loss of breeding success or otherwise lead to nest abandonment. Noise from road use, generators, and heavy equipment may disrupt nesting bird mating calls or songs, which could impact reproductive success.

Evidence impact would be significant: Fish and Game Code section 3503 makes it 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 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by the 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.). 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) 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.

3-11

Recommended Potentially Feasible Mitigation Measure(s): CDFW supports the inclusion of MM BIO-1 and MM BIO-2 with revisions in the final MND, as per below, to avoid impacts to nesting birds (edits are in ~~strikethrough~~ and additions are in **bold**):

Mitigation Measure BIO-1:

~~If construction is planned between the dates of February 15 through September 1, a nesting bird survey prior to construction is required to prevent violation of the Migratory Bird Treaty Act. Within seven (7) days prior to commencement of grading/construction activities, a qualified biologist shall perform a preconstruction survey within 500 feet of the proposed work limits.~~

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 12 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 12 of 20

~~If active avian nest(s) are discovered within or 500 feet from the work limits, a buffer shall be delineated around the active nest(s) measuring 300 feet. A qualified biologist shall monitor the nest(s) weekly after commencement of construction to ensure that nesting behavior is not adversely affected by such activities.~~

- a. To minimize avoid impacts to nesting birds in the Project Site, the Qualified Avian Biologist shall conduct pre-construction surveys of all potential raptor and passerine nesting habitat within the Project Site. The raptor survey shall focus on potential nest sites (i.e., utility poles and trees) within a 300-foot buffer around the Project site. These surveys shall be conducted no more than 14 days prior to ground-disturbing activities. The Qualified Avian Biologist must be able to determine the status and stage of nesting migratory birds and all locally breeding passerine and raptor species without causing intrusive disturbance.
- b. If active nests are found, within the Project area or within 500 feet of the Project area, the nest shall be flagged and mapped on the construction plans and a suitable buffer based on the species' sensitivity to disturbance, and as determined by the Qualified Avian Biologist shall be established around active nests, and no construction within the buffer shall be allowed until the Qualified Avian Biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Buffers may be reduced at the discretion of the Qualified Avian Biologist based on Project activity, line of sight, tolerance of individuals, and stage of the nest. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall be conducted when construction occurs in close proximity to an active nest buffer. The buffer shall remain in place until determined by the Qualified Avian Biologist that the nestlings have fledged, and the nest is no longer active. If an active nest is encountered during the Project construction, construction shall stop immediately until a Qualified Avian Biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.
- c. ~~If the qualified biologist determines that nesting behavior is adversely affected by grading/construction activities, then a noise mitigation program shall be implemented in consultation with the California Department of Fish and Wildlife (CDFW), to allow such activities to proceed. Once the young have fledged and left the nest(s) then construction activities may proceed within 300 feet of the fledged nest(s).~~

3-11

COMMENT 10:

Section IV, Page 16

Issue: The MND does not include an assessment of impacts to biological resources resulting from construction noise nor mitigation measures to avoid or reduce impacts to a level less than significant.

Specific impact: The MND (p. 16) states, "If the qualified biologist determines that nesting behavior is adversely affected by grading/construction activities, then a noise mitigation program shall be implemented in consultation with CDFW, to allow such activities to proceed." CDFW is concerned this statement does not mention that it will adhere to any regulations or methods of noise reduction.

3-12

Why impact would occur: Noise from Project activities can impact many species by disrupting breeding cycles and foraging opportunities. These impacts can greatly reduce the fecundity of species.

Evidence impact would be significant: Construction may result in substantial noise through road use, equipment, and other Project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 13 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 13 of 20

occur at exposure levels of only 55 to 60 dB (Barber et al. 2009). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cues (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Because of the potential for construction noise to negatively impact wildlife, CDFW recommends the inclusion of MM BIO-9 in a revised MND to replace the portions of MM BIO-3 regarding construction noise:

Mitigation Measure BIO-9:

During all Project construction, the City of Holtville shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City of Holtville shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

COMMENT 11:

Section MND IV, Page 16

Issue: The MND does not analyze impacts to biological resources from artificial nighttime lighting and includes no mitigation measures to avoid or reduce impacts to biological resources to a level less than significant. Designs for lighting to be used during operation of the Project should be included in a revised MND, along with details of artificial nighttime lighting to be used during construction.

Specific impact: The MND does not provide any details regarding the use of artificial nighttime lighting or the impacts to biological resources resulting from the use of artificial nighttime lighting during construction of the Project, and no mitigation measures are proposed. The direct and indirect impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife should be analyzed, and appropriate avoidance and minimization measures to reduce impacts to less than significant should be included in a revised MND.

Why impact would occur: Artificial light can impact special-status species by disrupting circadian rhythms, interfering with foraging and protection from predators, causing confusion with migration patterns.

Evidence impact would be significant: Artificial nighttime lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Artificial lighting alters ecological processes including, but not limited to, 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 (Gatson et al. 2013). Many species use photoperiod cues for communication including bird song (Miller 2006), determining when to begin foraging (Stone et al. 2009), behavioral thermoregulation (Beiswenger 1977), and migration (Longcore & Rich 2004).

3-12

3-13

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 14 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 14 of 20

Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore & Rich 2004).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Because of the potential for artificial nighttime lighting to negatively impact wildlife, CDFW recommends a revised MND include a light impact assessment and an analysis of impacts to biological resources accompanied by specific avoidance and minimization measures to ensure that impacts to wildlife are avoided or reduced to less than significant. CDFW recommends adding the following mitigation measure to a revised MND:

Mitigation Measure BIO-10:

During Project construction and operations over the lifetime of the Project, the City of Holtville shall eliminate all nonessential lighting throughout the Project area and avoid the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Holtville shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, 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 <https://darksky.org/>). The City of Holtville 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.

3-13

COMMENT 12:

Section IV, Page 16-17

Issue: The Project has the potential to result in permanent and temporary loss, degradation, and impacts to western burrowing owl habitat. The Project may result in the take of western burrowing owl, a CESA candidate species, during construction of the Project and life of the Project.

Specific impact: The MND describes that no burrows were located on-site, and no sign of burrowing owl were observed, however since the time of surveying, western burrowing owl could have potentially inhabited the site. If western burrowing owl has inhabited the site the potential for the collapsing of burrows, entombment, displacement, direct take associated with vehicle and equipment strike, indirect take associated with Project operations such as attracting predators, reduction of habitat and habitat quality could occur. The Project as described will potentially cause permanent and temporary impacts to western burrowing owl foraging and nesting habitat.

3-14

Why impact would occur: Although the MND states that no active sign of western burrowing owl was found throughout the site, only one general survey was performed in 2016. This outdated survey does not preclude the potential that burrowing owl has inhabited the area. The loss of burrowing owl habitat could result in significant impacts.

Evidence impact would be significant: The Project, as described, may result in injury, direct mortality, indirect mortality, disruption of breeding behavior, and/or may reduce reproductive capacity of the species. CDFW considers the direct and indirect take of western burrowing owl, and the loss of the species' habitat as a significant impact, unless mitigated to a level of less than significant and in compliance with State (i.e., Fish and Game Code sections 3503.5, etc.) and Federal laws (i.e., Migratory Bird Treaty Act). Furthermore, following the Fish and Game Commission's decision to list western burrowing owl as a candidate species under CESA, CDFW considers the take of burrowing owl and the loss of the species' habitat as a significant impact, unless mitigated to a level of less than significant which may include that ground disturbing

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 15 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 15 of 20

activities be postponed until appropriate authorization (i.e., a finalized CESA ITP under Fish and Game Code section 2081) is obtained.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

CDFW supports the inclusion of MM BIO-4 with revisions in the final MND, as per below, to avoid impacts to a CESA candidate species (edits are in ~~strike through~~ and additions are in **bold**.) CDFW also recommends the MND includes avoidance, minimization or mitigation measures to ensure the Project impacts are reduced to a less than significant level with the inclusion of MM BIO-11.

Mitigation Measure BIO-4:

~~Although there were no sensitive species identified by the study, and more specifically, no burrowing owls, the following mitigation measures shall be shown on building plans as details, notes or as otherwise appropriate in the event that burrowing owls are identified during the pre-construction survey:~~

~~a. In the event that an active burrow is found, the active burrow that is in the zone of construction should be passively relocated, following guidelines found within California Department of Fish and Game (CDFG) guidelines with consultation with CDFG Bermuda Dunes office. Prior to relocation, two artificial burrows per active burrow to be closed will be installed in the vicinity of the trail Alamo River.~~

~~b. Burrowing owl worker training should be given to construction workers prior to the start of work by a qualified biologist, which would include the following information:~~

- ~~• Distribution~~
- ~~• General behavior and ecology~~
- ~~• Sensitivity to human activities~~
- ~~• Legal protection~~
- ~~• Penalties for violations of State or Federal laws~~
- ~~• Reporting requirements~~
- ~~• Project protective mitigation measures~~
- ~~• A wallet card will be given to each worker~~

Western Burrowing Owl. If complete avoidance cannot be achieved an CESA Incidental Take Permit (ITP) for western burrowing owl shall be obtained prior to initiation of ground disturbing activities. The Project proponent shall adhere to measures and conditions set forth within the ITP. Compensatory mitigation for direct impacts to the species shall be fulfilled at a minimum 1:1 ratio through purchase of available western burrowing owl conservation bank credits suitable for CESA mitigation (if available), perpetual conservation and management of suitable and occupied western burrowing owl habitat of equal or better quality, or another method as reviewed and approved by CDFW.

MM-BIO-4.1 At least 45 days prior to construction the Project proponent shall conduct a survey of the Project site to determine if burrowing owls are present. If present the Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval at least 30 days prior to initiation of ground disturbing activities. The Burrowing Owl Plan shall include 1) impact assessment that details the number and location of occupied burrow sites, and acres of burrowing owl habitat; 2) if avoidance of impacts is proposed, details on avoidance actions and monitoring such as proposed buffers, visual barriers and other actions; 3) site monitoring to be conducted prior to, during, and after any exclusion of burrowing owls from their burrows sufficient to ensure take is avoided, daily monitoring with cameras and direct observation for one week to confirm young of the year have fledged if the exclusion will occur immediately after the end of the breeding season, and process to document any excluded burrowing owls use of artificial or natural burrows on an adjoining mitigation site (if able to confirm by band resight), 4) details of proposed mitigation for impacts to occupied burrows and habitat. The proposed implementation of burrow exclusion and closure should only be considered as a last resort. If impacts to

3-14

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 16 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 16 of 20

occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW review and approval. The requirements of the Burrowing Owl Plan may be superseded or supplemented by the requirements of the CESA ITP.

MM-BIO-4.2: Burrowing Owl Avoidance. If burrowing owls are detected on-site, a Qualified Biologist, knowledgeable of burrowing owl habitat and behavior, shall establish a no-disturbance buffer following the guidelines within the 2012 Staff Report on Burrowing Owl Mitigation (or most recent version) around all burrowing owl burrows such as roosting and satellite burrows within the Project area and an appropriate buffer determined by the Qualified Biologist, with posted signs demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. The Qualified Biologist shall delineate burrows with different materials than those used to delineate the Project area, and the materials shall not attract raptor perching. Project proponent shall remove and properly dispose of all materials used for delineation immediately upon completion of the Project.

MM-BIO-4.3 To ensure that the Project avoids impacts to burrowing owl, a Qualified Biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses or a break in construction activities of 3 days will trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.

MM-BIO-4.4 During take avoidance surveys the Project proponent shall have a Qualified Biologist(s), pre-approved by CDFW, inspect all burrows that exhibit typical characteristics of burrowing owl activity prior to any site-preparation activities. Evidence of owl activity may include presence of owls themselves, burrows, and owl sign at burrow entrances such as pellets, whitewash or other "ornamentation," feathers, prey remains, etc. If it is evident that the burrows are actively being used, the Project proponent shall follow the guidelines in the CDFW approved Burrowing Owl Plan and Conditions of Approval within the CESA ITP. If no Plan has been approved or CESA ITP obtained, the Project proponent shall not commence activities until owls have been confirmed absent and the burrows are no longer in use by adult or juvenile owls or until a Burrowing Owl Plan has been submitted and approved, and a CESA ITP obtained.

Mitigation Measure BIO-11:

A Qualified Biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include, but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area and (2) protected species that have the potential to occur on the Project site. Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work onsite.

ENVIRONMENTAL DATA

3-14

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 17 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 17 of 20

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>.

3-15

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.)

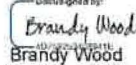
CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the City of Holtville in identifying and mitigating Project impacts on biological resources.

3-16

Questions regarding this letter or further coordination should be directed to Austin Gutierrez, Environmental Scientist at (909) 544-2525 or Austin.Gutierrez@Wildlife.ca.gov.

Sincerely,


Brandy Wood

Environmental Program Manager

Attachments

Attachment A: Mitigation, Monitoring, and Reporting Program (MM³⁻¹) r CDFW
Proposed Mitigation Measures

ec: Office of Planning and Research, State Clearinghouse, Sacramento
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Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 18 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 18 of 20

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3-17

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 19 of 27)

Nicolas Wells, City Manager
City of Holtville
January 31, 2025
Page 19 of 20

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3-17

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 20 of 27)

**Attachment A
Draft Mitigation, Monitoring, and Reporting Program**

Draft Mitigation, Monitoring, and Reporting Program (MMRP)
CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
<p>MM BIO-1:</p> <p>a. To minimize avoid impacts to nesting birds in the Project Site, the Qualified Avian Biologist shall conduct pre-construction surveys of all potential raptor and passerine nesting habitat within the Project Site. The raptor survey shall focus on potential nest sites (i.e., utility poles and trees) within a 300-foot buffer around the Project site. These surveys shall be conducted no more than 14 days prior to ground-disturbing activities. The Qualified Avian Biologist must be able to determine the status and stage of nesting migratory birds and all locally breeding passerine and raptor species without causing intrusive disturbance.</p> <p>b. If active nests are found, within the Project area or within 500 feet of the Project area, the nest shall be flagged and mapped on the construction plans and a suitable buffer based on the species' sensitivity to disturbance, and as determined by the Qualified Avian Biologist shall be established around active nests, and no construction within the buffer shall be allowed until the Qualified Avian Biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Buffers may be reduced at the discretion of the Qualified Avian Biologist based on Project activity, line of sight, tolerance of individuals, and stage of the nest. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall be conducted when construction occurs in close proximity to</p>	<p>No more than 14 days prior to vegetation clearing or ground-disturbing activities/ During all Project construction</p>	<p>City of Holtville</p>

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 21 of 27)

<p>an active nest buffer. The buffer shall remain in place until determined by the Qualified Avian Biologist that the nestlings have fledged, and the nest is no longer active. If an active nest is encountered during the Project construction, construction shall stop immediately until a Qualified Avian Biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.</p>		
<p>MM BIO-4: Western Burrowing Owl. If complete avoidance cannot be achieved an Incidental Take Permit (ITP) for western burrowing owl shall be obtained prior to initiation of ground disturbing activities. The Project proponent shall adhere to measures and conditions set forth within the ITP. Compensatory mitigation for direct impacts to the species shall be fulfilled at a minimum 1:1 ratio through purchase of available western burrowing owl conservation bank credits suitable for CESA mitigation (if available), perpetual conservation and management of suitable and occupied western burrowing owl habitat of equal or better quality, or another method as reviewed and approved by CDFW.</p>	<p>Prior to Project construction activities</p>	<p>City of Holtville</p>
<p>MM-BIO-4.1: At least 45 days prior to construction the Project proponent shall conduct a survey of the Project site to determine if burrowing owls are present. If present the Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval at least 30 days prior to initiation of ground disturbing activities. The Burrowing Owl Plan shall include 1) impact assessment that details the number and location of occupied burrow sites, and acres of burrowing owl habitat; 2) if avoidance of impacts is proposed, details on avoidance actions and monitoring such as proposed buffers, visual barriers and other actions; 3) site monitoring to be conducted prior to, during, and after any exclusion of burrowing owls from their burrows sufficient to ensure take is avoided, daily monitoring with cameras and direct observation for one week to confirm young of the year have fledged if the exclusion will occur immediately after the end of the breeding season, and process to document any excluded burrowing owls use of artificial or natural burrows on an adjoining mitigation site (if able to confirm by band resight), 4) details of proposed</p>	<p>Prior to Project construction activities</p>	<p>City of Holtville</p>

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 22 of 27)

mitigation for impacts to occupied burrows and habitat. The proposed implementation of burrow exclusion and closure should only be considered as a last resort. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls. If no suitable habitat is available nearby, details regarding the creation and funding of artificial burrows (numbers, location, and type of burrows) and management activities for relocated owls shall also be included in the Burrowing Owl Plan. The Project proponent shall implement the Burrowing Owl Plan following CDFW review and approval. The requirements of the Burrowing Owl Plan may be superseded or supplemented by the requirements of the CESA ITP.		
MM-BIO-4.2: Burrowing Owl Avoidance. If burrowing owls are detected on-site, a Qualified Biologist, knowledgeable of burrowing owl habitat and behavior, shall establish a no-disturbance buffer following the guidelines within the 2012 Staff Report on Burrowing Owl Mitigation (or most recent version) around all burrowing owl burrows such as roosting and satellite burrows within the Project area and an appropriate buffer determined by the Qualified Biologist, with posted signs demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. The Qualified Biologist shall delineate burrows with different materials than those used to delineate the Project area, and the materials shall not attract raptor perching. Project proponent shall remove and properly dispose of all materials used for delineation immediately upon completion of the Project.	Prior to Project construction activities/ During all Project construction/ End of construction	City of Holtville
MM-BIO-4.3: To ensure that the Project avoids impacts to burrowing owl, a Qualified Biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses or a break in construction activities of 3 days will trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.	Prior to Project construction activities	City of Holtville
MM-BIO-4.4: During take avoidance surveys the Project proponent shall have a Qualified	Prior to Project construction activities	City of Holtville

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 23 of 27)

Biologist(s), pre-approved by CDFW, inspect all burrows that exhibit typical characteristics of burrowing owl activity prior to any site-preparation activities. Evidence of owl activity may include presence of owls themselves, burrows, and owl sign at burrow entrances such as pellets, whitewash or other "ornamentation," feathers, prey remains, etc. If it is evident that the burrows are actively being used, the Project proponent shall follow the guidelines in the CDFW approved Burrowing Owl Plan and Conditions of Approval within the CESA ITP. If no Plan has been approved or CESA ITP obtained, the Project proponent shall not commence activities until owls have been confirmed absent and the burrows are no longer in use by adult or juvenile owls or until a Burrowing Owl Plan has been submitted and approved, and a CESA ITP obtained.		
MM BIO-5: Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish and Game Code §§ 3511, 4700, 5050, 5515), shall be completed. Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Species-specific surveys following protocols and guidelines, shall be completed by a Qualified Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Appropriate avoidance, minimization, and mitigation measures shall be developed for present species in consultation with CDFW, which may include obtaining a CESA incidental take permit (ITP).	Prior to Project construction activities	City of Holtville
MM BIO-6: Construction shall either occur outside of the swallow nesting period (generally March 15 through August 31), or the City of Holtville shall submit to CDFW, for review and approval, a Nesting Bird Avoidance Plan, prepared by a Qualified Avian	Prior to Project construction activities	City of Holtville

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 24 of 27)

Biologist which could include methods to deter swallow nesting.		
<p>MM BIO-7: Prior to the start of Project activities, the City of Holtville shall retain a Qualified Bat Biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the proposed Project. Within suitable bat roosting habitat, the Qualified Bat Biologist shall conduct 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 the Qualified Bat Biologist. Surveys shall be conducted during favorable weather conditions only. 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, and to determine if night roosting is occurring in the area.</p> <p>If bats are found using any trees or structures within the Project area, including the bridge and any cliff swallow nests on the bridge, the Qualified Bat Biologist shall identify the bats to the species level and evaluate the colony, if applicable, to determine its size and significance. The bat survey results shall include: 1) the exact location of all roosting sites (location shall be described and mapped); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present (including how the species was identified); 4) the location of all signs of bats (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks, and bats squeaking and chattering)(described and mapped); 5) the type of roost: maternity roost, winter roost (hibernacula), and night roost (resting at night while out feeding) versus a day roost (resting all day) must also be clearly stated; and 6) proposed avoidance and minimization measures, including avoidance of bats in swallow nests. The results of the survey shall be submitted to CDFW for review prior to initiating Project activities.</p>	<p>Prior to Project construction activities/ During all Project construction</p>	<p>City of Holtville</p>

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 25 of 27)

<p>If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction within these areas shall only occur generally between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Appropriate time to start Project construction to avoid impact shall be confirmed by a Qualified Bat Biologist. Maternity roosts shall not be evicted, excluded, removed, or disturbed.</p> <p>If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan prepared by the Qualified Bat Biologist shall be submitted for CDFW review and approval prior to relocation and construction activities. The Qualified Bat Biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall also be in place with sufficient timing prior to the initiation of Project-related activities to allow bat relocation, with the timing specified by the Qualified Bat Biologist with consideration of the species. Removal of roosts shall be guided by accepted exclusion and deterrent techniques developed by the Qualified Bat Biologist. The City shall compensate no less than 2:1 for permanent impacts to roosting habitat with replacement and permanent protection of roost habitat.</p>		
<p>MM BIO-8: Prior to the start of Project activities, a biologist who has a valid 10(a)(1)(A) Fish and Wildlife Service recovery permit and a CDFW CESA</p>	<p>Prior to Project construction activities</p>	<p>City of Holtville</p>

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 26 of 27)

Memorandum of Understanding for Yuma Ridgway's rail shall perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project Evaluation within a 500-foot buffer of the Project. The survey requires 6 callback surveys between March 1 and May 15. If presence of Yuma Ridgway's rail is detected, Project activities that require the use of heavy equipment shall not take place during the species peak breeding season (generally February 15 to September 30). CDFW shall be notified in writing of detection of this species within three (3) days. If protocol surveys indicate this species is not present within the 500-foot buffer, Project activities may proceed subject to the other provisions of federal and state law. The results of the protocol surveys shall be provided to CDFW prior to commencement of Project activities.		
MM BIO-9: To the greatest extent practicable, Project plans shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the City of Holtville shall restore the habitat to pre-project conditions, or compensatory mitigation for direct and permanent impacts consisting of habitat acquisition at a minimum of a 2:1 ratio. Habitat acquisition sites shall be biologically equal or superior to existing conditions and shall be conserved and managed in perpetuity.	Prior to Project construction activities	City of Holtville
MM BIO-10: During all Project construction, the City of Holtville shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City of Holtville shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.	During all Project construction	City of Holtville
MM BIO-11: During Project construction and operations over the lifetime of the Project, the City of Holtville shall eliminate all nonessential lighting throughout the Project area and avoid the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Holtville shall ensure that all lighting for the Project is fully shielded, cast downward and	Throughout construction and the lifetime operations of the Project	City of Holtville

3-18

Letter 3 – California Department of Fish and Wildlife, Brandy Wood (Pg. 27 of 27)

away from surrounding open-space areas, reduced in intensity to the greatest extent, 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 https://darksky.org/). The City of Holtville 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.		
MM BIO-12: A Qualified Biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include, but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area and (2) protected species that have the potential to occur on the Project site. Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work onsite.	Prior to Project construction activities	City of Holtville

3-18

2.7 Letter 3 – City of Holtville Response to Comments

Response to Comment 3-1: The comment provides introductory remarks and a description of the Department of Fish and Wildlife's role in the CEQA review process. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Response to Comment 3-2: The comment provides a summary of the Alamo River Trestle Bridge Project and includes information on the project's objective and location. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Response to Comment 3-3: The comment begins by stating the main issue being that the project description does not specify if project activities will occur in the Alamo River. The comment then proceeds to state that if project activities will impact resources in the Alamo River, the City will need to notify the Department of Fish and Wildlife for a Streambed Alteration Agreement (LSA) to avoid potential impacts to the River's bed, bank, or channel, and the resources that rely upon it. Information regarding the legislative code and role the Department of Fish and Wildlife plays in protecting streams and the resources they provide is further listed in the comment.

The comment then recommends that the City updates the draft IS/MND to state whether the project will impact resources subject to Fish and Game Code Section 1602 and provide a description of the activities along with avoidance, minimization, or mitigation measures if the said resources are impacted by the project. If the project impacts the specified resources, the commenter further recommends that the Revised IS/MND requires notification to the Department of Fish and Wildlife for an LSA agreement along with required mitigation measures to reduce the impacts to the Alamo River to less than significant. This comment has been noted, and mitigation measure BIO-5 was added to the Revised IS/MND which states the following:

BIO-5: LSA Agreement

If project activities occur in the Alamo River, CDFW will be notified for a Streambed Alteration Agreement (LSA) pursuant to Fish and Game Code section 1602.

Response to Comment 3-4: The comment begins by stating a passage from the draft

IS/MND describing the findings of a biological survey along the river bluff conducted by the City in June of 2016. The Department of Fish and Wildlife expressed their concern about the potential of special status species being on or near the project site since their determination of the biological survey timing and scope was deemed to be insufficient to detect all special status species on or near the project site. The commenter further states that the California Natural Diversity Database (CNDDDB) and data layers in the Biogeographic Information and Observation System (BIOS) indicate that federal Endangered Species Act-listed, CESA-listed, or other special-status species have been reported or have the potential to occur in the Project area that were not addressed in the draft IS/MND.

The commenter points out that recent surveys during the appropriate times of the year are needed to identify potential impacts to biological resources; inform appropriate avoidance, minimization, and mitigation measures; and determine whether impacts to biological resources have been mitigated to a level that is less than significant. One of the reasons for this determination is that special-status species may not be present during an individual survey and if migratory special-status species are present during other times of the year, they could be impacted by Project activities when timelines intersect.

The commenter ends the comment by recommending that the draft IS/MND be revised to include updated survey results following approved guidelines and protocols and provide an impact analysis. If the recommendation is not accepted by the City, the commenter recommends the inclusion of a new mitigation measure requiring a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected prior to the start of construction activities. This comment has been noted, and mitigation measure BIO-6 was added to the Revised IS/MND which states the following:

BIO-6: Biological Survey

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish and Game Code §§ 3511, 4700, 5050, 5515), shall be completed. Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and

should not be limited to resident species. Species-specific surveys following protocols and guidelines, shall be completed by a Qualified Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Appropriate avoidance, minimization, and mitigation measures shall be developed for present species in consultation with CDFW, which may include obtaining a CESA incidental take permit (ITP).

Response to Comment 3-5: The comment begins by stating that the biological report prepared by the City in 2016 is outdated and evaluation of the environmental baseline should be reconducted using proper surveying guidance and protocols for all biological resources. An outdated biological survey may not account for all current species and habitats present on the project site which may lead to potentially significant impacts to special-status species and other biological resources. The comment continued by stating that the lack of identification of present biological resources and unmitigated project activities can significantly impact special-status species through but not limited to direct mortality, destruction of foraging habitat, and/or destruction of nesting habitat.

The commenter recommends that the City of Holtville conduct new, species-specific biological survey for special-status species and sensitive natural communities near the project site following CDFW and USFWS guidelines and protocols. The Revised IS/MND should reflect the survey results of all special-status species and sensitive natural communities in the vicinity of the project site and note the presence and absence of species and sensitive natural communities. This comment has been noted, and mitigation measure BIO-6 which requires a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected prior to the start of construction activities was added to the Revised IS/MND. Refer to Response to Comment 3-4 for additional information.

Response to Comment 3-6: The comment begins by stating that the biological report prepared by the City in 2016 identified cliff swallows (*Petrochelidon pyrrhonota*) near the project site, but the draft IS/MND does not described potential impacts nor mitigation to reduce any potential impact for these species. The comment continues by stating that removal of the sections of the Alamo River trestle bridge can result in harm to or take of the species and/or destruction of nests. Removal and replacement of the existing Alamo River trestle bridge could also

cause disturbance to cliff swallow nesting areas which can lead to nest abandonment and loss of fecundity. The comment then provides legislating information prohibiting the taking, possession, or needless destruction of the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto.

The commenter recommends the inclusion of a mitigation measure in the Revised IS/MND if cliff swallow (*Petrochelidon pyrrhonota*) presence identified in the project area by updated biological surveys. This comment has been noted, and mitigation measure BIO-7 was added to the Revised IS/MND which states the following:

BIO-7: Swallow Nesting

Construction shall either occur outside of the swallow nesting period (generally March 15 through August 31), or the City of Holtville shall submit to CDFW, for review and approval, a Nesting Bird Avoidance Plan, prepared by a Qualified Avian Biologist which could include methods to deter swallow nesting.

Response to Comment 3-7: The comment begins by stating the Department of Fish and Wildlife's concern that the draft IS/MND does not sufficiently identify and evaluate potential Project impacts to bat species or ensure that impacts are reduced to a level less than significant. The comment further states that there is the potential for multiple bat species on or near the project site and could also potentially night roost within the Alamo River trestle bridge. Another concern is the potential for multiple bat species to roost in cliff swallow mud-nests as well as the interstitial crevices between nests or between the nest and the structure, which are potentially present on the Alamo River trestle bridge. Disturbance of bat roosting habitats on the Alamo River trestle bridge due to removal of damaged bridge parts can potentially impact species of bats by direct mortality, roosting disturbances, and breeding disturbances. The comment then provides legislating information stating that the take (hunt, pursue, catch, capture, or kill, or attempt to do so; Fish & G. Code §86) of nongame mammals is prohibited by Fish and Game Code §4150.

The commenter reiterates the recommendation that a Revised IS/MND include the survey results of whether cliff swallow nests occur on the bridge and also include an analysis of the potential impacts to bats that may use these nests for roosting. The commenter further recommends the addition of a mitigation measure requiring the City of Holtville to retain a qualified bat biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the

proposed Project. This comment has been noted. Mitigation measure BIO-6 requires a complete biological survey prior to construction and has already been incorporated to the Revised IS/MND (Refer to Response to Comment 3-4 for additional information). Mitigation measure BIO-8 was also added to the Revised IS/MND which states the following:

BIO-8: Bat Species

Prior to the start of Project activities, the City of Holtville shall retain a Qualified Bat Biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the proposed Project. Within suitable bat roosting habitat, the Qualified Bat Biologist shall conduct 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 the Qualified Bat Biologist. Surveys shall be conducted during favorable weather conditions only. 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, and to determine if night roosting is occurring in the area. The following actions will also be conducted as needed:

- If bats are found using any trees or structures within the Project area, including the bridge and any cliff swallow nests on the bridge, the Qualified Bat Biologist shall identify the bats to the species level and evaluate the colony, if applicable, to determine its size and significance. The bat survey results shall include: 1) the exact location of all roosting sites (location shall be described and mapped); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present (including how the species was identified); 4) the location of all signs of bats (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks, and bats squeaking and chattering)(described and mapped); 5) the type of roost: maternity roost, winter roost (hibernacula), and night roost (resting at night while out feeding) versus a day roost (resting all day) must also be clearly stated; and 6) proposed avoidance and minimization measures, including avoidance of bats in swallow nests. The results of the survey shall be submitted to CDFW for review prior to initiating Project activities.
- If active maternity roosts are identified in the work area or 500 feet

extending from the work area, Project construction within these areas shall only occur generally between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Appropriate time to start Project construction to avoid impact shall be confirmed by a Qualified Bat Biologist. Maternity roosts shall not be evicted, excluded, removed, or disturbed.

- If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare
- If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan prepared by the Qualified Bat Biologist shall be submitted for CDFW review and approval prior to relocation and construction activities. The Qualified Bat Biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall also be in place with sufficient timing prior to the initiation of Project-related activities to allow bat relocation, with the timing specified by the Qualified Bat Biologist with consideration of the species. Removal of roosts shall be guided by accepted exclusion and deterrent

techniques developed by the Qualified Bat Biologist. The City shall compensate no less than 2:1 for permanent impacts to roosting habitat with replacement and permanent protection of roost habitat.

Response to Comment 3-8: The comment begins by stating the Department of Fish and Wildlife's concern that the Draft IS/MND does not sufficiently identify potential Project impacts to Yuma Ridgway's rail (*Rallus obsoletus yumanensis*), a CESA-listed threatened species, and fully protected species, or ensure that impacts are reduced to a level less than significant. The comment continues by stating that the project may result in adverse impacts to this CESA-listed and state fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors through the removal of vegetation, damaged portions of the Alamo River trestle bridge, and noise during project activities. The comment then provides legislating information which prohibits the take (under Fish & G. Code, § 86, "take" means to hunt, pursue, catch, capture, or kill, or to attempt to hunt, pursue, catch, capture, or kill) of any endangered, threatened, or candidate species that results from a proposed project, except as authorized by state law (Fish & G. Code, §§ 2080, 2085).

The commenter then reiterates that the 2016 biological report prepared by the City is out of date, and recommends that protocol-level surveys be conducted to determine the presence or absence of Yuma Ridgway's rail on the Project site and a 500-foot buffer. The commenter further recommends that the City of Holtville include in the analysis how appropriate avoidance measures will reduce direct and indirect impacts to species to a level less than significant. Project activities described in the Draft IS/MND should generally be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. The comment concluded by recommending a mitigation measure requiring a licensed biologist to perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project Evaluation within a 500-foot buffer of the project prior to the start of construction activities. This comment has been noted, and mitigation measure BIO-9 was added to the Revised IS/MND which states the following:

BIO-9: Yuma Ridgway Rail Survey

Prior to the start of Project activities, a biologist who has a valid 10(a)(1)(A) Fish and Wildlife Service recovery permit and a CDFW CESA Memorandum of Understanding for Yuma Ridgway's rail shall perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project

Evaluation within a 500-foot buffer of the Project. The survey requires 6 callback surveys between March 1 and May 15. If presence of Yuma Ridgway's rail is detected, Project activities that require the use of heavy equipment shall not take place during the species peak breeding season (generally February 15 to September 30). CDFW shall be notified in writing of the detection of this species within three (3) days. If protocol surveys indicate this species is not present within the 500-foot buffer, Project activities may proceed subject to the other provisions of federal and state law. The results of the protocol surveys shall be provided to CDFW prior to commencement of Project activities.

Response to Comment 3-9: The comment begins by stating the Department of Fish and Wildlife's concern that the project site potentially contains suitable habitat for western burrowing owl, a CESA-listed candidate species and that the Draft IS/MND does not analyze or identify potential impact nor propose mitigation for any potential loss of nesting burrows, satellite burrows, foraging habitat, dispersal and migration habitat, wintering habitat, and habitat linkages, including habitat supporting prey and host burrowers, and other essential habitat attributes. The comment continues by stating that western burrowing owls are dependent on burrows at all times of the year for survival and/or reproduction, evicting them from nesting, roosting, and satellite burrows may lead to indirect impacts or take. Loss of access to burrows will likely result in varying levels of increased stress on western burrowing owls and could depress reproduction, increase predation, increase energetic costs, and introduce risks posed by having to find and compete for available burrows. As written, the Draft IS/MND only requires replacement of burrows determined to be occupied at the time of preconstruction surveys and does not analyze temporal consideration of species occupancy and their use of the surrounding landscape for survival. The comment then provides legislating information which lists the western burrowing owl as a candidate species and is granted full protection of a threatened or endangered species under CESA.

The commenter then recommends that the City of Holtville perform breeding and non-breeding surveys per the guidance of the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012), assess the impact, and create a mitigation measure to include avoidance, minimization, and mitigation for burrowing owls identified on-site, and these same measures be applied to any individuals found during take avoidance surveys as conditions by the proposed mitigation measure. The commenter further recommends the guidance of mitigating impacts to burrowing owls in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012) be followed, including (a) permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat

acreage, number of burrows and burrowing owls impacted are replaced with permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. This comment has been noted, and mitigation measure BIO-10 was added to the Revised IS/MND which states the following:

BIO-10: Burrowing Owl Breeding and Non-breeding Surveys

The City of Holtville shall perform breeding and non-breeding surveys per the guidance of the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012), assess the impact, and create mitigation measures to include avoidance, minimization, and mitigation for any burrowing owls identified on-site, and these same measures be applied to any individuals found during any take avoidance surveys. The guidance of mitigating impacts to burrowing owls in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012) shall be followed, including (a) permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced with permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals.

Response to Comment 3-10: The comment begins by stating that the Draft IS/MND provides no avoidance, minimization, or mitigation measures for the potential impacts to arrow-weed thickets. Arrow weed thickets are listed on the CDFW Vegetation Classification and Mapping Program's (VegCAMP) Sensitive Natural Communities Only by Life Form list (CDFW, June 2023) as a S3 state rarity ranking. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review process of CEQA.

The commenter then recommends that the City of Holtville includes a mitigation measure requiring the City to avoid impacts to arrow-weed thickets or restore the habitat to pre-project conditions if avoidance is unfeasible. This comment has been noted, and mitigation measure BIO-11 was added to the Revised IS/MND which states the following:

BIO-11: Arrow-weed Thickets

To the greatest extent practicable, all project plans shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the City of Holtville shall restore the habitat to pre-project conditions, or compensatory mitigation for direct and permanent impacts consisting of habitat acquisition at a minimum of a 2:1 ratio. Habitat acquisition sites shall be biologically equal or superior to existing conditions and shall be conserved and managed in perpetuity.

Response to Comment 3-11: The comment begins by stating that the project activities may result in the degradation and permanent loss of nesting bird habitats and may also result in direct mortality and/or injury to nesting birds and take of their nests onsite through trimming/removing vegetation along the Alamo River Walking Trail. Direct take may result from vehicle and equipment strikes and from predators attracted to the construction site. Indirect take may result from displacement, reduction of habitat and habitat quality, and from impacted foraging and nesting habitat. Additionally, construction during the breeding season of nesting birds could potentially result in the incidental loss of breeding success or otherwise lead to nest abandonment. Noise from road use, generators, and heavy equipment may disrupt nesting bird mating calls or songs, which could impact reproductive success. The comment then provides legislative information such as Fish and Game Code section 3503 which makes it 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.

The commenter then recommends that the City of Holtville make changes to mitigation measure BIO-1 to prevent or reduce impacts to nesting birds. This comment has been noted, and mitigation measure BIO-1 was modified as follows:

BIO-1: Nesting Bird Survey

~~If construction is planned between the dates of February 15 through September 1, a nesting bird survey prior to construction is required to prevent violation of the Migratory Bird Treaty Act. Within seven (7) days prior to commencement of grading/construction activities, a qualified biologist shall perform a preconstruction survey within 500 feet of the proposed work limits. If active avian nest(s) are discovered within or 500 feet from the work limits, a buffer shall be delineated around the active nest(s) measuring 300 feet. A qualified biologist shall monitor the nest(s) weekly after commencement of construction to ensure that nesting behavior is not adversely affected by such activities.~~

- a. To minimize avoid impacts to nesting birds in the Project Site, the Qualified Avian Biologist shall conduct pre-construction surveys of all potential raptor and passerine nesting habitat within the Project Site. The raptor survey shall focus on potential nest sites (i.e., utility poles and trees) within a 300-foot buffer around the Project site. These surveys shall be conducted no more than 14 days prior to ground-disturbing activities. The Qualified Avian Biologist must be able to determine the status and stage of nesting migratory birds and all locally breeding passerine and raptor species without causing intrusive disturbance.
- b. If active nests are found, within the Project area or within 500 feet of the Project area, the nest shall be flagged and mapped on the construction plans and a suitable buffer based on the species' sensitivity to disturbance, and as determined by the Qualified Avian Biologist shall be established around active nests, and no construction within the buffer shall be allowed until the Qualified Avian Biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Buffers may be reduced at the discretion of the Qualified Avian Biologist based on Project activity, line of sight, tolerance of individuals, and stage of the nest. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall be conducted when construction occurs in close proximity to an active nest buffer. The buffer shall remain in place until determined by the Qualified Avian Biologist that the nestlings have fledged, and the nest is no longer active. If an active nest is encountered during the Project construction, construction shall stop immediately until a Qualified Avian Biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Response to Comment 3-12: The comment begins by stating that the Draft IS/MND does not include an assessment of impacts to biological resources resulting from construction noise nor mitigation measures to avoid or reduce impacts to a level less than significant. Noise from Project activities can impact many species by disrupting breeding cycles and foraging opportunities. These impacts can greatly reduce the fecundity of species. Construction may result in substantial noise through road use, equipment, and other Project-related activities.

Because of the potential for construction noise to negatively impact wildlife, the commenter recommends the inclusion of a mitigation measure restricting construction noise generated by the project in the Revised IS/MND to replace the portions of MM BIO-3 regarding construction noise. This comment has been noted, and mitigation measure BIO-3 was replaced as follows:

BIO-3: Noise Mitigation Program

~~If the qualified biologist determines that nesting behavior is adversely affected by grading/construction activities, then a noise mitigation program shall be implemented in consultation with the California Department of Fish and Wildlife (CDFW), to allow such activities to proceed. Once the young have fledged and left the nest(s), then construction activities may proceed within 300 feet of the fledged nest(s).~~

During all Project construction, the City of Holtville shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City of Holtville shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

Response to Comment 3-13: The comment begins by stating that the Draft IS/MND does not analyze impacts to biological resources from artificial nighttime lighting and includes no mitigation measures to avoid or reduce impacts to biological resources to a level less than significant. Designs for lighting to be used during operation of the project should be included in a Revised IS/MND, along with details of artificial nighttime lighting to be used during construction. The direct and indirect impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife should be analyzed, and appropriate avoidance and minimization measures to reduce impacts to less than significant should be included in a Revised IS/MND. Artificial light can also impact special-status species by disrupting circadian rhythms, interfering with foraging and protection from predators, causing confusion with migration patterns.

Because of the potential for artificial nighttime lighting to negatively impact wildlife, CDFW recommends that a Revised IS/MND include a light impact assessment and an analysis of impacts to biological resources accompanied by specific avoidance and minimization measures to ensure that impacts to wildlife are avoided or reduced to less than significant. This comment has been noted, and mitigation measure BIO-12 was added which states the following:

BIO-12: Nighttime Lighting

During Project construction and operations over the lifetime of the Project, the

City of Holtville shall eliminate all nonessential lighting throughout the Project area and avoid the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Holtville shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, 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 <https://darksky.org/>). The City of Holtville 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.

Response to Comment 3-14: The comment begins by stating that the project has the potential to result in permanent and temporary loss, degradation, and impacts to western burrowing owl habitat. The project may result in the take of western burrowing owl, a CESA candidate species, during construction of the project and life of the project. The Draft IS/MND describes that no burrows were located on-site, and no sign of burrowing owl were observed, however since the time of surveying, western burrowing owl could have potentially inhabited the site. If western burrowing owl has inhabited the site the potential for the collapsing of burrows, entombment, displacement, direct take associated with vehicle and equipment strike, indirect take associated with project operations such as attracting predators, reduction of habitat and habitat quality could occur. The comment then provides legislative information supporting CDFW's findings that the take of burrowing owl and the loss of the species' habitat as a significant impact unless mitigation to a level less than significant is included.

The commenter then recommends that the City of Holtville make changes to mitigation measure BIO-4 to avoid impacts to CESA candidate species and the inclusion of mitigation measure BIO-13 to include avoidance, minimization or mitigation measures. This comment has been noted, and mitigation measure BIO-4 was updated, and mitigation measure BIO-13 was added as follows:

BIO-4: Burrowing Owl

~~Although there were no sensitive species identified by the study, and more specifically, no burrowing owls, the following mitigation measures shall be shown on building plans as details, notes or as otherwise appropriate in the event that burrowing owls are identified during the pre-construction survey:~~
Western Burrowing Owl. If complete avoidance cannot be achieved an CESA Incidental Take Permit (ITP) for western burrowing owl shall be obtained prior

to initiation of ground disturbing activities. The Project proponent shall adhere to measures and conditions set forth within the ITP. Compensatory mitigation for direct impacts to the species shall be fulfilled at a minimum 1:1 ratio through purchase of available western burrowing owl conservation bank credits suitable for CESA mitigation (if available), perpetual conservation and management of suitable and occupied western burrowing owl habitat of equal or better quality, or another method as reviewed and approved by CDFW.

- a. ~~In the event that an active burrow is found, the active burrow that is in the zone of construction should be passively relocated, following guidelines found within California Department of Fish and Game (CDFG) guidelines with consultation with CDFG Bermuda Dunes office. Prior to relocation, two artificial burrows per active burrow to be closed will be installed in the vicinity of the trail Alamo River. Burrowing Owl Avoidance. If burrowing owls are detected on-site, a Qualified Biologist, knowledgeable of burrowing owl habitat and behavior, shall establish a no-disturbance buffer following the guidelines within the 2012 Staff Report on Burrowing Owl Mitigation (or most recent version) around all burrowing owl burrows such as roosting and satellite burrows within the Project area and an appropriate buffer determined by the Qualified Biologist, with posted signs demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. The Qualified Biologist shall delineate burrows with different materials than those used to delineate the Project area, and the materials shall not attract raptor perching. Project proponent shall remove and properly dispose of all materials used for delineation immediately upon completion of the Project.~~
- b. ~~Burrowing owl worker training should be given to construction workers prior to the start of work by a qualified biologist, which would include the following information: To ensure that the Project avoids impacts to burrowing owl, a Qualified Biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses or a break in construction activities of 3 days will trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.~~

●—Distribution

- ~~General behavior and ecology~~
 - ~~Sensitivity to human activities~~
 - ~~Legal protection~~
 - ~~Penalties for violations of State or Federal laws~~
 - ~~Reporting requirements~~
 - ~~Project protective mitigation measures~~
 - A wallet card will be given to each worker
- c. During take avoidance surveys the Project proponent shall have a Qualified Biologist(s), pre-approved by CDFW, inspect all burrows that exhibit typical characteristics of burrowing owl activity prior to any site-preparation activities. Evidence of owl activity may include presence of owls themselves, burrows, and owl sign at burrow entrances such as pellets, whitewash or other "ornamentation," feathers, prey remains, etc. If it is evident that the burrows are actively being used, the Project proponent shall follow the guidelines in the CDFW approved Burrowing Owl Plan and Conditions of Approval within the CESA ITP. If no Plan has been approved or CESA ITP obtained, the Project proponent shall not commence activities until owls have been confirmed absent and the burrows are no longer in use by adult or juvenile owls or until a Burrowing Owl Plan has been submitted and approved, and a CESA ITP obtained.

BIO-13: Education Program

A Qualified Biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include, but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area and (2) protected species that have the potential to occur on the Project site. Interpretation shall be provided for any non-English speaking

workers, and the same instruction shall be provided for any individual prior to their performing any work onsite.

Response to Comment 3-15: The comment provides instructions and website links for submitting CEQA documents and project surveys to the state for review. Additional information on CDFW environmental submittals and filing fees is also provided. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Response to Comment 3-16: The comment provides closing remarks and contact information to send any questions regarding the review letter. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Response to Comment 3-17: The comment provides references for the information cited throughout the comment letter. The comment does not address the adequacy of the environmental analysis; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

Response to Comment 3-18: The comment provides a table with the mitigation measures CDFW recommend be added or modified in the Revised IS/MND. A response for each comment and mitigation measure has already been addressed in prior responses; therefore, no changes to the Revised IS/MND in response to this comment are necessary.

3.0 Errata and Changes to the Draft IS/MND

3.1 Revisions

Minor editorial revisions were made in the Draft IS/MND in the following sections:

- Cover Page (Page 1)
- Project Description (Page 2)
- Environmental Factors Potentially Affected (Page 6)
- Section III. Air Quality (Page 12)
- Section VII. Geology and Soils (Pages 28 – 31)
- Section XXI. Mandatory Findings of Significance (Pages 49)
- Appendix A (Added)

Revisions to the Draft IS/MND based on the California Department of Transportation comment letter (Letter 1) received:

- **Revisions associated with comments 1-2 and 1-3:** Section XVII. Transportation and Traffic Impacts and Discussion on page 42 of the Revised MND was revised to include the addition of text as follows:

“a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? - No Impact - The proposed project will not conflict with any circulation program, plan, ordinance, or policy. Rather than conflict, the project furthers program number 6 of the Circulation Element of the 2017 General Plan which consists of developing a pedestrian and bicycle network with the goal of connecting public, residential, and business areas within the City of Holtville. Furthermore, the proposed project will not cause the traffic impact threshold guidelines established by the State or City of Holtville to be exceeded. Therefore, the project will have no impact. While the project is expected to have no impact, the following mitigation measures are being implemented to account for any vehicle or combination of vehicles of a size or weight exceeding the maximum limitations from the California Vehicle Code operating or moving through State Route 115 during the project's construction phase.

Mitigation Measures:

TRANSP-1: Department of Transportation Hauling/Traffic Permit

Prior to the start of any construction activities, the City shall acquire a permit from the Department of Transportation to operate or move a vehicle or combination of vehicles or special mobile equipment, of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code, on State Route 115 or any other facility under the jurisdiction of the Department of Transportation.

Timing/Implementation: Prior to Construction/City of Holtville

Enforcement/Monitoring: City of Holtville

TRANSP-2: Department of Transportation Encroachment Permit

Should any work within the Department of Transportation Right-of-Way be required for the project, the City shall acquire an encroachment permit from the Department of Transportation prior to the start of construction activities within their Right-of-Way.

Timing/Implementation: Prior to Construction/City of Holtville

Enforcement/Monitoring: City of Holtville

TRANSP-3: Perpetuation of Monuments

Per Business and Profession Code 8771, perpetuation of survey monuments shall be carried out by a licensed land surveyor should any existing monuments be destroyed by construction activities related to the project.

Timing/Implementation: Prior to Construction/Contractor

Enforcement/Monitoring: City of Holtville”

- **Revisions associated with comment 2-4:** Section III. Air Quality on page 12 of the Revised IS/MND was revised to include the addition of text as follows:

“The project site is located within the Salton Sea Air Basin. The Imperial County Air Pollution Control District (ICAPCD) is responsible for ensuring that all State and Federal ambient air quality standards are achieved and maintained within the County of Imperial. The County of Imperial is designated as a “non-attainment” area with respect to Federal Standards for both particulate matter (PM10) and ozone (smog). Rural single-family homes are within a quarter mile of the project site and immediate vicinity which are considered sensitive receptors. Grading and construction activities of the proposed project may generate significant amounts of dust (PM 10). It is estimated that construction will take approximately two (2) months to complete. Mitigation measures will need to be incorporated to lessen impacts from dust, in accordance with ICAPCD regulations. Additionally, the project will comply with all ICAPCD rules and regulations.”

- **Revisions associated with comments 3-3 and 3-14:** Section IV. Biological Resources pages 15 – 22 of the Revised IS/MND was revised to include the addition of text as follows:

“A formal biological survey was conducted in June of 2016 for the City of Holtville Alamo River Wetlands Walking Trail project which stretches approximately 1.3 miles from Earl Walker Park, 500 feet south of the project site, to the City of Holtville Wetlands north of the project site. While the survey spans the length of the proposed Alamo River Walking trail, the trestle bridge project is well within the biological surveys scope given that the trestle bridge and portions of the trail to be improved are part of the overall Alamo River Trail project. The 2016 biological survey concluded by stating that no riparian habitats nor any endangered, threatened, or species of concern would be affected (See **Appendix A - Biological Report**).

Nonetheless, the age of the survey coupled with potential disturbance from construction activities within this area may potentially impact the biological resources in the area thus requiring mitigation measures to reduce the impact to less than significant. ~~is still a possibility and recommended mitigation measures will be in place.~~

Biological Resources Impact Discussion:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? - Potentially Significant Unless Mitigation is Incorporated** - The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. The 2016 biological survey determined that no endangered, threatened, or species of concern would be affected by the Alamo River Trail project which encompasses the proposed trestle bridge repairs and trail improvements. The survey further focused on searching for signs of Burrowing Owl (BUOW) activity but made no such findings and determined that the habitat is not favorable to burrowing and that the burrowing owl would not be expected in the trail area which includes the project site. While the survey did not identify any impact on endangered, threatened, or species of concern, the survey's age is a concern since it does not fully account for the current conditions of the project site and the single survey may not address all potential impacts to biological resources in the area. Therefore, the City of Holtville will still implement the following measures as recommended by the California Department of Fish and Wildlife (CDFW): the survey

Mitigation Measures

BIO-1: Nesting Bird Survey

~~If construction is planned between the dates of February 15 through September 1, a nesting bird survey prior to construction is required to prevent violation of the Migratory Bird Treaty Act. Within seven (7) days prior to commencement of grading/construction activities, a qualified biologist shall perform a preconstruction survey within 500 feet of the proposed work limits.~~

- a) To minimize avoid impacts to nesting birds in the Project Site, the Qualified Avian Biologist shall conduct pre-construction surveys of all potential raptor and passerine nesting habitat within the Project Site. The raptor survey shall focus on potential nest sites (i.e., utility poles and trees) within a 300-foot buffer around the Project site. These surveys shall be conducted no more than 14 days prior to ground-disturbing activities. The Qualified Avian Biologist must be able to determine the status and stage of nesting migratory birds and all locally breeding passerine and raptor species without causing intrusive disturbance.
- b) If active nests are found, within the Project area or within 500 feet of the Project area, the nest shall be flagged and mapped on the construction plans and a suitable buffer based on the species' sensitivity to disturbance, and as determined by the Qualified Avian Biologist shall be established around active nests, and no construction within the buffer shall be allowed until the Qualified Avian Biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Buffers may be reduced at the discretion of the Qualified Avian Biologist based on Project activity, line of sight, tolerance of individuals, and stage of the nest. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall be conducted when construction occurs in close proximity to an active nest buffer. The buffer shall remain in place until determined by the Qualified Avian Biologist that the nestlings have fledged, and the nest is no longer active. If an active nest is encountered during the Project construction, construction shall stop immediately until a Qualified Avian Biologist can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.

Timing/Implementation: Prior to Construction/Licensed Biologist Contractor

Enforcement/Monitoring: City of Holtville

BIO-2: Buffers

If active avian nest(s) are discovered within or 500 feet from the work limits, a buffer shall be delineated around the active nest(s) measuring 300 feet. A qualified biologist shall monitor the nest(s) weekly after commencement of construction to ensure that nesting behavior is not adversely affected by such activities.

Timing/Implementation: Prior to and during Construction/~~Contractor~~
Licensed Biologist and Contractor

Enforcement/Monitoring: City of Holtville

BIO-3: Noise Mitigation Program

~~If the qualified biologist determines that nesting behavior is adversely affected by grading/construction activities, then a noise mitigation program shall be implemented in consultation with the California Department of Fish and Wildlife (CDFW), to allow such activities to proceed. Once the young have fledged and left the nest(s), then construction activities may proceed within 300 feet of the fledged nest(s). During all Project construction, the City of Holtville shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City of Holtville shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.~~

Timing/Implementation: ~~Prior to~~ During Construction/Contractor

Enforcement/Monitoring: City of Holtville

BIO-4: Burrowing Owl

~~Although there were no sensitive species identified by the study, and more specifically, no burrowing owls, the following mitigation measures shall be shown on building plans as details, notes or as otherwise appropriate in the event that burrowing owls are identified during the pre-construction survey: Western Burrowing Owl. If complete avoidance cannot be achieved an CESA Incidental Take Permit (ITP) for western burrowing owl shall be obtained prior to initiation of ground disturbing activities. The Project proponent shall adhere to measures and conditions set forth within the ITP. Compensatory mitigation for direct impacts to the species shall be fulfilled at a minimum 1:1 ratio through purchase of available western burrowing owl conservation bank credits suitable for CESA mitigation (if available), perpetual conservation and management of suitable and occupied western burrowing owl habitat of equal or better quality, or another method as reviewed and approved by CDFW.~~

- a) ~~In the event that an active burrow is found, the active burrow that is in the zone of construction should be passively relocated, following guidelines found within California Department of Fish and Game (CDFG) guidelines with consultation with CDFG Bermuda Dunes office. Prior to relocation, two artificial burrows per active burrow to be closed will be installed in the vicinity of the trail Alamo River. Burrowing Owl Avoidance. If burrowing owls are detected on-site, a Qualified Biologist, knowledgeable of burrowing owl habitat and behavior, shall establish a no-disturbance buffer following the guidelines within the 2012 Staff Report on Burrowing Owl Mitigation (or most recent version) around all burrowing owl burrows such as roosting and satellite burrows within the Project area and an appropriate buffer determined by the Qualified Biologist, with posted signs demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. The Qualified Biologist shall delineate burrows with different materials than those used to delineate the Project area, and the materials shall not attract raptor perching. Project proponent shall remove and properly dispose of all materials used for delineation immediately upon completion of the Project.~~
- b) ~~Burrowing owl worker training should be given to construction workers prior to the start of work by a qualified biologist, which would include the following information: To ensure that the Project avoids impacts to burrowing owl, a Qualified Biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses or a break in construction activities of 3 days will trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.~~
- ~~Distribution~~
 - ~~General behavior and ecology~~
 - ~~Sensitivity to human activities~~
 - ~~Legal protection~~
 - ~~Penalties for violation of State or Federal Laws~~

- Reporting requirements
- Project protective mitigation measures
- A wallet card will be given to each worker

Timing/Implementation: Prior to Construction/City of Holtville, Qualified Biologist, CDFW, and Contractor

BIO-5: LSA Agreement

If project activities occur in the Alamo River, CDFW will be notified for a Streambed Alteration Agreement (LSA) pursuant to Fish and Game Code section 1602.

Timing/Implementation: Prior to Construction/City of Holtville and CDFW

Enforcement/Monitoring: City of Holtville

BIO-6: Biological Survey

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish and Game Code §§ 3511, 4700, 5050, 5515), shall be completed. Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Species-specific surveys following protocols and guidelines, shall be completed by a Qualified Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Appropriate avoidance, minimization, and mitigation measures shall be developed for present species in consultation with CDFW, which may include obtaining a CESA incidental take permit (ITP).

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-7: Swallow Nesting

Construction shall either occur outside of the swallow nesting period

(generally March 15 through August 31), or the City of Holtville shall submit to CDFW, for review and approval, a Nesting Bird Avoidance Plan, prepared by a Qualified Avian Biologist which could include methods to deter swallow nesting.

Timing/Implementation: Prior to and during Construction/City of Holtville and CDFW

Enforcement/Monitoring: City of Holtville

BIO-8: Bat Species

Prior to the start of Project activities, the City of Holtville shall retain a Qualified Bat Biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the proposed Project. Within suitable bat roosting habitat, the Qualified Bat Biologist shall conduct 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 the Qualified Bat Biologist. Surveys shall be conducted during favorable weather conditions only. 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, and to determine if night roosting is occurring in the area. The following actions will also be conducted as needed:

- If bats are found using any trees or structures within the Project area, including the bridge and any cliff swallow nests on the bridge, the Qualified Bat Biologist shall identify the bats to the species level and evaluate the colony, if applicable, to determine its size and significance. The bat survey results shall include: 1) the exact location of all roosting sites (location shall be described and mapped); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present (including how the species was identified); 4) the location of all signs of bats (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks, and bats squeaking and chattering)(described and mapped); 5) the type of roost: maternity roost, winter roost (hibernacula), and night roost (resting at night while out feeding) versus a day roost (resting all day) must also be clearly stated; and 6) proposed avoidance and

minimization measures, including avoidance of bats in swallow nests. The results of the survey shall be submitted to CDFW for review prior to initiating Project activities.

- If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction within these areas shall only occur generally between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Appropriate time to start Project construction to avoid impact shall be confirmed by a Qualified Bat Biologist. Maternity roosts shall not be evicted, excluded, removed, or disturbed.
- If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. A bat roost relocation plan prepared by the Qualified Bat Biologist shall be submitted for CDFW review and approval prior to relocation and construction activities. The Qualified Bat Biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall also be in place with sufficient timing prior to the initiation of Project-related activities to allow bat relocation, with the timing specified by the Qualified Bat Biologist with consideration of the species. Removal of roosts shall be guided by accepted exclusion and deterrent techniques developed by the Qualified Bat Biologist. The City shall compensate no less than 2:1 for permanent impacts to roosting habitat with replacement and permanent protection of roost habitat.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-9: Yuma Ridgway Rail Survey

Prior to the start of Project activities, a biologist who has a valid 10(a)(1)(A) Fish and Wildlife Service recovery permit and a CDFW CESA Memorandum of Understanding for Yuma Ridgway's rail shall perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project Evaluation within a 500-foot buffer of the Project. The survey requires 6 callback surveys between March 1 and May 15. If presence of Yuma Ridgway's rail is detected, Project activities that require the use of heavy equipment shall not take place during the species peak breeding season (generally February 15 to September 30). CDFW shall be notified in writing of the detection of this species within three (3) days. If protocol surveys indicate this species is not present within the 500-foot buffer, Project activities may proceed subject to the other provisions of federal and state law. The results of the protocol surveys shall be provided to CDFW prior to commencement of Project activities.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-10: Burrowing Owl Breeding and Non-breeding Surveys

The City of Holtville shall perform breeding and non-breeding surveys per the guidance of the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012), assess the impact, and create mitigation measures to include avoidance, minimization, and mitigation for any burrowing owls identified on-site, and these same measures be applied to any individuals found during any take avoidance surveys. The guidance of mitigating impacts to burrowing owls in the *Staff Report on Burrowing Owl Mitigation* (CDFG, 2012) shall be followed, including (a) permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced with permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

BIO-11: Arrow-weed Thickets

To the greatest extent practicable, all project plans shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the City of Holtville shall restore the habitat to pre-project conditions, or compensatory mitigation for direct and permanent impacts consisting of habitat acquisition at a minimum of a 2:1 ratio. Habitat acquisition sites shall be biologically equal or superior to existing conditions and shall be conserved and managed in perpetuity.

Timing/Implementation: Prior to and during Construction/Contractor

Enforcement/Monitoring: City of Holtville

BIO-12: Nighttime Lighting

During Project construction and operations over the lifetime of the Project, the City of Holtville shall eliminate all nonessential lighting throughout the Project area and avoid the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Holtville shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, 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 <https://darksky.org/>). The City of Holtville 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.

Timing/Implementation: Prior to and during Construction/Contractor

Enforcement/Monitoring: City of Holtville

BIO-13: Education Program

A Qualified Biologist shall conduct an education program for all persons employed or otherwise working on the Project site prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include, but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in

the area and (2) protected species that have the potential to occur on the Project site. Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work onsite.

Timing/Implementation: Prior to Construction/Licensed Biologist

Enforcement/Monitoring: City of Holtville

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? - Potentially Significant Unless Mitigation Measures are Incorporation -**

Sensitive habitats are those that are designated either rare within the region by governmental agencies or known to support sensitive animal or plant species and/or they serve as "corridors" for wildlife within the region. The vegetation community along the Alamo Riverbanks mainly consists of weedy plants such as salt cedar, fragmites and arrowweed. The proposed project consists of the replacement of the damaged structural components of the trestle bridge, the installation of a new pedestrian walkway on the top deck of the bridge, and improvements to the existing Alamo River Trail. While the project is not proposing to remove any existing vegetation, the City will strive to avoid and minimize impacts to the vegetation to the greatest extent possible. Furthermore, ~~the 2016 biological survey concluded that no riparian habitats nor any endangered, threatened, or species of concern would be affected by the Alamo River Trail project which encompasses the proposed project area.~~ While the survey did not identify any impact to riparian habitats or other sensitive natural communities, the City of Holtville will still implement the following mitigation measures as recommended by CDFW the survey.

Mitigation Measures

Implement Mitigation measure BIO-1: Nesting Bird Survey

Implement Mitigation measure BIO-2: Buffers

Implement Mitigation measure BIO-3: Noise Mitigation Program

Implement Mitigation measure BIO-4: Burrowing Owl

Implement Mitigation measure BIO-5: Streambed Alteration Agreement

Implement Mitigation measure BIO-6: Biological Survey

Implement Mitigation measure BIO-7: Swallow Nesting

Implement Mitigation measure BIO-8: Bat Species

Implement Mitigation measure BIO-9: Yuma Ridgway Rail Survey

Implement Mitigation measure BIO-10: Burrowing Owl Breeding and Non-breeding Surveys

Implement Mitigation measure BIO-11: Arrow-weed Thickets

Implement Mitigation measure BIO-12: Nighttime Lighting

Implement Mitigation measure BIO-13: Education Program”

4.0 and Monitoring Reporting Program

4.1 Mitigation Monitoring and Reporting Requirements

Public Resources Code (PRC) Section 21081.6 mandates that the following requirements shall apply to all reporting or mitigation monitoring programs:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a Responsible Agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the Lead Agency or a Responsible Agency, prepare and submit a proposed reporting or monitoring program.
- The Lead Agency shall specify the location and custodian of the documents or other material, which constitute the record of proceedings upon which its decision is based. A public agency shall provide measures to mitigate or avoid significant effects on the environment that are fully enforceable through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents which address required mitigation measures or in the case of the adoption of a plan, policy, regulation, or other project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.
- Prior to the close of the public review period for a draft Environmental Impact Report (EIR) or Mitigated Negative Declaration (MND), a Responsible Agency, or a public agency having jurisdiction over natural resources affected by the project, shall either submit to the Lead Agency complete and detailed performance objectives for mitigation measures which would address the significant effects on the environment identified by the Responsible Agency or agency having jurisdiction over natural resources affected by the project, or refer the Lead Agency to appropriate, readily available guidelines or reference documents. Any mitigation measures submitted to a Lead Agency by a Responsible Agency or an agency having jurisdiction over natural resources affected by the project shall be limited to measures that mitigate impacts to resources, which are subject to the statutory authority of, and definitions applicable to, that agency. Compliance or noncompliance by a Responsible Agency or agency having jurisdiction over natural resources affected by a project with that requirement shall not limit that authority of the Responsible Agency or agency having jurisdiction over natural resources affected by a project, or the authority of the Lead Agency, to approve,

condition, or deny projects as provided by this division or any other provision of law.

4.2 Mitigation Monitoring and Reporting Procedures

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in compliance with PRC Section 21081.6. It describes the requirements and procedures to be followed by the City of Holtville Planning and Building Department to ensure that all mitigation measures or required project design features (PDF) adopted as part of the proposed project will be carried out as described in this Revised IS/MND. Table 2 lists each of the mitigation measures or project design features specified in this document and identifies the party or parties responsible for implementation and monitoring of each measure.

Table 2. Mitigation Monitoring and Reporting Program

Mitigation Measures	Enforcement	Timing/Implementation	Compliance Verification (Date and Signature Required)
1. AESTHETICS			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
2. AGRICULTURE AND FORESTRY RESOURCES			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
3. AIR QUALITY			
<p>AQ-1: Dust Control Plan: The contractor shall submit a Dust Control Plan identifying all sources of PM10 Emissions to ICAPCD for approval. Construction of the project site will be subject to the requirements of ICAPCD Rule 800, Fugitive Dust Requirement for control of fine particulate matter (PM10).</p> <ul style="list-style-type: none"> <i>Inactive Construction Areas:</i> Apply non-toxic soil stabilizers, dust suppressants, tarps, or other suitable material to all inactive construction areas. Visible emissions shall be limited to 20% opacity for dust emissions. <i>Active Site Area:</i> Water active site areas twice daily or as needed to comply with Regulation VIII. <i>Storage Piles:</i> Control dust for material storage piles by either enclosing, covering 	City of Holtville	Prior to and during construction/Contractor	

<p>and watering twice daily or as needed to comply with Regulation VIII. Outdoor storage of fine particulate material is prohibited.</p> <ul style="list-style-type: none"> • <i>Hauling:</i> All trucks hauling dirt, sand, soil, or other loose materials shall be covered, unless six inches of freeboard space from the top of the container is maintained with no spillage. In addition, the cargo compartment of all haul trucks is to be cleaned or washed at the delivery site after removal of bulk material. • <i>Adjacent Roadways:</i> Pave permanent roads as quickly as possible to minimize dust. Install wheel washers where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the project site. Sweep streets at the end of the day. • <i>Unpaved Roads and Parking/Staging Areas:</i> Apply water three times daily, dust suppress or chemically stabilize with non-toxic soils all unpaved roads and parking. Visible emissions shall be limited to 20% opacity. • <i>Speed Limit:</i> Traffic speeds on unpaved roads shall be limited to 5 miles per hour. • <i>Construction Roadways:</i> Pave construction roads that have a traffic volume of more than 50 daily trips. Access roads leading into the construction site shall be paved at least 25 feet from the main road. • <i>Disturbed Areas:</i> When active construction 			
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<p>ceases on the site, replace ground cover as quickly as possible.</p> <ul style="list-style-type: none"> • <i>Track Out or Carry Out.</i> Track out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area. 			
<p>AQ-2: Air Quality Measures: The Applicant shall ensure the following air quality measures are shown on applicable grading permits:</p> <p>a. Construction of the project site will be subject to the requirements of the Imperial County Air Pollution Control Standard Mitigation Measures for Construction Combustion Equipment:</p> <ul style="list-style-type: none"> • Use of alternative fueled or catalyst equipped diesel construction equipment, including all off-road and portable diesel-powered equipment. • Minimize idling time either by shutting equipment when not in use or reducing the time of idling to 5 minutes as a maximum. • Limit, to the extent feasible, the hours of operation of heavy-duty equipment and/or the amount of equipment in use. • Replace fossil fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set). 	City of Holtville	During Construction/Contractor	

<ul style="list-style-type: none"> • Maintain all construction equipment in proper tune according to manufacturer's specifications; fuel off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generators sets, compressors, with ARB certified motor vehicle diesel fuel. <p>b. To provide a greater degree of reduction of PM10 emissions from construction combustion equipment per Air Pollution Control District recommendations, the project shall curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak hour of vehicular traffic on adjacent roadways.</p> <p>c. The proposed project shall further implement activity management (e.g. rescheduling activities to reduce short-term impacts).</p>			
4. BIOLOGICAL RESOURCES			
<p>BIO-1: Nesting Bird Survey:</p> <p>a. To minimize avoid impacts to nesting birds in the Project Site, the Qualified Avian Biologist shall conduct pre-construction surveys of all potential raptor and passerine nesting habitat within the Project Site. The raptor survey shall focus on potential nest sites (i.e., utility poles and trees) within a 300-foot buffer around the Project site. These surveys shall be conducted no more than 14 days prior to</p>	<p>City of Holtville</p>	<p>Prior to Construction/Licensed Biologist</p>	

<p>ground-disturbing activities. The Qualified Avian Biologist must be able to determine the status and stage of nesting migratory birds and all locally breeding passerine and raptor species without causing intrusive disturbance.</p> <p>b. If active nests are found, within the Project area or within 500 feet of the Project area, the nest shall be flagged and mapped on the construction plans and a suitable buffer based on the species' sensitivity to disturbance, and as determined by the Qualified Avian Biologist shall be established around active nests, and no construction within the buffer shall be allowed until the Qualified Avian Biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Buffers may be reduced at the discretion of the Qualified Avian Biologist based on Project activity, line of sight, tolerance of individuals, and stage of the nest. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. On-site construction monitoring shall be conducted when construction occurs in close proximity to an active nest buffer. The buffer shall remain in place until determined by the Qualified Avian Biologist that the nestlings have fledged, and the nest is no longer active. If an active nest is encountered during the Project construction, construction shall stop immediately until a Qualified Avian Biologist</p>			
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can determine (1) the status of the nest, and (2) when work can proceed without risking violation to state or federal laws.			
BIO-2: Buffers: If active avian nest(s) are discovered within or 500 feet from the work limits, a buffer shall be delineated around the active nest(s) measuring 300 feet. A qualified biologist shall monitor the nest(s) weekly after commencement of construction to ensure that nesting behavior is not adversely affected by such activities.	City of Holtville	Prior to and during Construction/ Licensed Biologist and Contractor	
BIO-3: Noise Mitigation Program: During all Project construction, the City of Holtville shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The City of Holtville shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.	City of Holtville	During Construction/Contractor	
BIO-4: Burrowing Owl: Western Burrowing Owl. If complete avoidance cannot be achieved an CESA Incidental Take Permit (ITP) for western burrowing owl shall be obtained prior to initiation of ground disturbing activities. The Project proponent shall adhere to measures and conditions set forth within the ITP. Compensatory mitigation for direct impacts to the species shall be fulfilled at a minimum 1:1 ratio	City of Holtville	Prior to Construction/City of Holtville, Qualified Biologist, CDFW, and Contractor	

through purchase of available western burrowing owl conservation bank credits suitable for CESA mitigation (if available), perpetual conservation and management of suitable and occupied western burrowing owl habitat of equal or better quality, or another method as reviewed and approved by CDFW.

- a. Burrowing Owl Avoidance. If burrowing owls are detected on-site, a Qualified Biologist, knowledgeable of burrowing owl habitat and behavior, shall establish a no-disturbance buffer following the guidelines within the 2012 Staff Report on Burrowing Owl Mitigation (or most recent version) around all burrowing owl burrows such as roosting and satellite burrows within the Project area and an appropriate buffer determined by the Qualified Biologist, with posted signs demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of burrowing owl habitat. The Qualified Biologist shall delineate burrows with different materials than those used to delineate the Project area, and the materials shall not attract raptor perching. Project proponent shall remove and properly dispose of all materials used for delineation immediately upon completion of the Project.
- b. To ensure that the Project avoids impacts to burrowing owl, a Qualified Biologist shall complete a take avoidance survey no less than 14 days prior to initiating ground

disturbance activities using the recommended methods described in the 2012 Staff Report. Burrowing owls may re-colonize a site after only a few days. Time lapses or a break in construction activities of 3 days will trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.			
BIO-5: LSA Agreement: If project activities occur in the Alamo River, CDFW will be notified for a Streambed Alteration Agreement (LSA) pursuant to Fish and Game Code section 1602.	City of Holtville	Prior to Construction/City of Holtville and CDFW	
BIO-6: Biological Survey: Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (SSC) and California Fully Protected Species (Fish and Game Code §§ 3511, 4700, 5050, 5515), shall be completed. Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Species-specific surveys following protocols and guidelines, shall be completed by a Qualified Biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable	City of Holtville	Prior to Construction/Licensed Biologist	

species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Appropriate avoidance, minimization, and mitigation measures shall be developed for present species in consultation with CDFW, which may include obtaining a CESA incidental take permit (ITP).			
BIO-7: Swallow Nesting: Construction shall either occur outside of the swallow nesting period (generally March 15 through August 31), or the City of Holtville shall submit to CDFW, for review and approval, a Nesting Bird Avoidance Plan, prepared by a Qualified Avian Biologist which could include methods to deter swallow nesting.	City of Holtville	Prior to and during Construction/City of Holtville and CDFW	
BIO-8: Bat Species: Prior to the start of Project activities, the City of Holtville shall retain a Qualified Bat Biologist to conduct a bat roosting habitat suitability assessment of the structures, trees, and vegetation that may be removed, altered, or indirectly impacted by the proposed Project. Within suitable bat roosting habitat, the Qualified Bat Biologist shall conduct 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 the Qualified Bat Biologist. Surveys shall be conducted during favorable weather conditions only. 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	City of Holtville	Prior to Construction/Licensed Biologist	

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, and to determine if night roosting is occurring in the area. The following actions will also be conducted as needed:

- If bats are found using any trees or structures within the Project area, including the bridge and any cliff swallow nests on the bridge, the Qualified Bat Biologist shall identify the bats to the species level and evaluate the colony, if applicable, to determine its size and significance. The bat survey results shall include: 1) the exact location of all roosting sites (location shall be described and mapped); 2) the number of bats present at the time of visit (count or estimate); 3) each species of bat present (including how the species was identified); 4) the location of all signs of bats (i.e., individuals, guano, urine staining, corpses, feeding remains, scratch marks, and bats squeaking and chattering)(described and mapped); 5) the type of roost: maternity roost, winter roost (hibernacula), and night roost (resting at night while out feeding) versus a day roost (resting all day) must also be clearly stated; and 6) proposed avoidance and minimization measures, including avoidance of bats in swallow nests. The results of the survey shall be submitted to CDFW for review prior to initiating Project activities.

<ul style="list-style-type: none"> • If active maternity roosts are identified in the work area or 500 feet extending from the work area, Project construction within these areas shall only occur generally between October 1 and February 28, outside of the maternity roosting season when young bats are present but are not yet ready to fly out of the roost. Appropriate time to start Project construction to avoid impact shall be confirmed by a Qualified Bat Biologist. Maternity roosts shall not be evicted, excluded, removed, or disturbed. • If active hibernacula (winter roosts) are identified in the work area or 500 feet extending from the work area, a minimum 500-foot no-work buffer shall be provided around hibernacula. The buffer shall not be reduced. Project-related construction and activities shall not occur within 500 feet of or directly under or adjacent to hibernacula. Buffers shall be left in place until the end of Project construction and activities or until a 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. If avoidance of a hibernacula is not feasible, the Qualified Bat Biologist will prepare a relocation plan to remove the hibernacula and provide for construction of an alternative bat roost outside of the work area. 			
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<p>A bat roost relocation plan prepared by the Qualified Bat Biologist shall be submitted for CDFW review and approval prior to relocation and construction activities. The Qualified Bat Biologist will implement the relocation plan and new roost sites shall be in place before the commencement of any ground-disturbing activities that will occur within 500 feet of the hibernacula. New roost sites shall also be in place with sufficient timing prior to the initiation of Project-related activities to allow bat relocation, with the timing specified by the Qualified Bat Biologist with consideration of the species. Removal of roosts shall be guided by accepted exclusion and deterrent techniques developed by the Qualified Bat Biologist. The City shall compensate no less than 2:1 for permanent impacts to roosting habitat with replacement and permanent protection of roost habitat.</p>			
<p>BIO-9: Yuma Ridgway Rail Survey: Prior to the start of Project activities, a biologist who has a valid 10(a)(1)(A) Fish and Wildlife Service recovery permit and a CDFW CESA Memorandum of Understanding for Yuma Ridgway's rail shall perform presence/absence surveys according to the Yuma Ridgway Rail Survey Protocol for Project Evaluation within a 500-foot buffer of the Project. The survey requires 6 callback surveys between March 1 and May 15. If presence of Yuma Ridgway's rail is detected, Project activities that require the use of heavy equipment shall not take place during the species peak breeding season (generally February</p>	<p>City of Holtville</p>	<p>Prior to Construction/Licensed Biologist</p>	

15 to September 30). CDFW shall be notified in writing of the detection of this species within three (3) days. If protocol surveys indicate this species is not present within the 500-foot buffer, Project activities may proceed subject to the other provisions of federal and state law. The results of the protocol surveys shall be provided to CDFW prior to commencement of Project activities.			
BIO-10: Burrowing Owl Breeding and Non-breeding Surveys: The City of Holtville shall perform breeding and non-breeding surveys per the guidance of the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG, 2012), assess the impact, and create mitigation measures to include avoidance, minimization, and mitigation for any burrowing owls identified on-site, and these same measures be applied to any individuals found during any take avoidance surveys. The guidance of mitigating impacts to burrowing owls in the <i>Staff Report on Burrowing Owl Mitigation</i> (CDFG, 2012) shall be followed, including (a) permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced with permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals.	City of Holtville	Prior to Construction/Licensed Biologist	

BIO-11: Arrow-weed Thickets: To the greatest extent practicable, all project plans shall avoid impacts to arrow-weed thickets. If arrow-weed thickets cannot be avoided, the City of Holtville shall restore the habitat to pre-project conditions, or compensatory mitigation for direct and permanent impacts consisting of habitat acquisition at a minimum of a 2:1 ratio. Habitat acquisition sites shall be biologically equal or superior to existing conditions and shall be conserved and managed in perpetuity.	City of Holtville	Prior to and during Construction/Contractor	
BIO-12: Nighttime Lighting: During Project construction and operations over the lifetime of the Project, the City of Holtville shall eliminate all nonessential lighting throughout the Project area and avoid the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The City of Holtville shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, 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 https://darksky.org/). The City of Holtville 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.	City of Holtville	Prior to and during Construction/Contractor	
BIO-13: Education Program: A Qualified Biologist shall conduct an education program for all persons employed or otherwise working on the Project site	City of Holtville	Prior to Construction/Licensed Biologist	

<p>prior to performing any work on-site (Workers Environmental Awareness Program; WEAP). The WEAP shall consist of a presentation that includes a discussion of the biology of the habitats and species that may be present at the site. The WEAP shall also include information on the distribution and habitat needs of any special-status species that may be present, legal protections for those species, penalties for violations, and mitigation measures. The WEAP shall include, but not be limited to: (1) best practices for managing waste and reducing activities that can lead to increased occurrences of opportunistic species and the impacts these species can have on wildlife in the area and (2) protected species that have the potential to occur on the Project site. Interpretation shall be provided for any non-English speaking workers, and the same instruction shall be provided for any individual prior to their performing any work onsite.</p>			
5. CULTURAL RESOURCES			
<p>CR-1: Inventory of Existing Conditions: Prior to the repair or rehabilitation of the bridge, it is recommended that an inventory be conducted to determine the age of the current existing materials. Specifically, the different elements of the bridge should be inspected to determine if they are original to the bridge or if they were modified/added at a later date. If individual members were replaced in-kind as part of the maintenance of the bridge over time, these do not need to be removed. Only materials that altered the original design or appearance of the bridge should be removed; however, replacement members should be noted in the inventory for</p>	<p>City of Holtville</p>	<p>Prior to Construction/Contractor</p>	

documentation purposes.			
CR-2: Historic American Engineering Record: Prior to the repair or rehabilitation of the bridge, it is recommended that the current condition of the bridge be documented through HAER-like documentation. The inventory of existing conditions conducted prior to this task should be used to help describe any modifications that have been made to the bridge and identify the remaining original portions. The HAER-like report should include a written presentation describing the physical entity and any appropriate engineering or architectural elements deemed important to the historical record. The report should provide a history of the bridge and its association with the development of the cities of El Centro and Holtville. The HAER-like process includes gathering historic photographs and any available engineering drawings, plans, and elevations. The formal recordation of the current configuration of the bridge includes digital photographs keyed to an engineering map of the bridge and a site plan to show the location of each photograph. All information and photographs generated by the HAER-like program should be incorporated into a report and attachments prepared for submittal to the City of Holtville and any designated curation centers.	City of Holtville	Prior to Construction/Contractor	
CR-3: Removal of Non-Historic Materials: All materials added to the bridge after its 1904 completion that altered its original appearance should be removed if feasible. This includes the steel truss that was added in place of the original trestle	City of Holtville	During Construction/Contractor	

and the metal deck plates added to either side of the railroad tracks. Any additional modern materials identified during the inventory of the bridge, or due to their absence in historic photographs or drawings, should also be removed.			
CR-4: Inspection of Existing Materials for Decay and Treatment: The historic materials remaining after modern elements have been removed should be inspected for decay.	City of Holtville	After Construction/Contractor	
CR-5: Repair and Replacement of Decayed or Damaged Materials: All original bridge members or materials that are rejected due to decay or damage should be repaired or replaced in-kind with historically accurate materials to retain the bridge's original historic character. Historic photographs and drawings found during historical research should be used as guidance for the repair and in-kind replacement of decayed or damaged materials. Any materials to be added to the historic bridge to facilitate the pedestrian use of the river crossing as part of the trail project shall match, to the extent possible, the appearance of the original materials. The existing track should remain but could be bordered by wood planks of sufficient height to allow a level pedestrian passage across the bridge. Finally, a plaque or historical marker should be placed at the entrance to the bridge that provides a description of the bridge's history, providing any historic images that reflect the history of the rail line in the growth of the area.	City of Holtville	During Construction/Contractor	
CR-6: Project Design: Design and construction of the Pete Mellinger Alamo River Trail and modifications	City of	Prior to	

to the historical railroad bridge must be precisely delineated to avoid any identified historic sites.	Holtville	Construction/Contractor	
CR-7: Cultural Materials: The design/construction plans shall further incorporate language that stipulates that if buried cultural materials are encountered during construction, work in that area must halt until a qualified archaeologist can evaluate the nature and significance of the finding.	City of Holtville	Prior to Construction/Contractor	
CR-8: Evaluation Program: If design of the trail is unable to avoid the historic sites beyond 50 feet of their original delineation, a cultural/historic evaluation program to assess potential impacts associated with the proposed project shall be prepared prior to any construction activities and an amendment to this Revised IS/MND shall be prepared and recirculated if further mitigation measures are warranted.	City of Holtville	Prior to Construction/Contractor	
CR-9: Archeologist: An archaeologist shall be present should excavation be proposed at depths greater than five feet.	City of Holtville	Prior to and during Construction/Contractor	
CR-10: Discovery of Human Remains: If evidence of human remains is discovered, construction activities within 200 feet of the discovery shall be halted or diverted and the Imperial County Coroner shall be notified (Section 7050.5 of the Health and Safety Code). If the Coroner determines that the remains are Native American, the Coroner will notify the NAHC which will designate a Most Likely Descendant (MLD) for the project (Section 5097.98 of the Public Resources Code). The designated MLD will be given 48 hours from the time access to the	NAHC, Imperial County Coroner, and Imperial County Department of Planning and Development Services.	During construction	

property is granted to make recommendations concerning treatment of the remains (AB 2641). If the landowner does not agree with recommendations of MLD, the NAHC can mediate (Section 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center, using an open space or conservation zoning designation or easement; or recording a document with the county in which the property is located (AB 2641).			
6. ENERGY			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
7. GEOLOGY AND SOILS			
GEO-1: A site-specific geotechnical investigation shall be prepared on an as needed basis for the project and said geotechnical report shall be implemented and shown on applicable grading and building plans as details, notes or as otherwise appropriate.	City of Holtville	Prior to Construction/Contractor	
GEO-2: State Building Code: The proposed project is located near active faults; therefore, the proposed bridge repairs and improvements shall be made in accordance with the California State Building Code (Title 24 of the California Administrative Code), which contains specifications to minimize adverse effects due to ground shaking from earthquakes and liquefaction.	City of Holtville	Prior to Construction/Contractor	
GEO-3: State Water Resources Control Board Permit: The Contractor shall comply with the	City of Holtville	Prior to Construction/Contractor	

regulatory requirements of the State Water Resources Control Board's (SWRCB) Order No. 2009-0009 DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002 for Discharges of Storm Water Runoff Associated with Construction Activity, copies of which are available on SWRCB website at http://www.swrcb.ca.gov/stormwtr/construction.html .			
GEO-4: Storm Water Pollution Prevention Plan: The City, or its authorized representative, shall require the preparation of a Storm Water Pollution Prevention Plan by a qualified preparer and shall coordinate the Notice of Intent and appropriate annual fees to the State Water Resources Control Board.	City of Holtville	Prior to Construction/Contractor	
GEO-5: Storm Water Pollution Prevention Plan Practitioner: The Contractor shall be responsible for implementation of the SWPPP and shall have a qualified SWPPP Practitioner (QSP) available on site and be responsible for implementation of all Best Management Practices.	City of Holtville	Prior to Construction/Contractor	
8. GREENHOUSE GAS EMISSIONS			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
9. HAZARDS AND HAZARDOUS MATERIALS			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
10. HYDROLOGY AND WATER QUALITY			
The proposed project would not result in significant			

adverse impacts related to aesthetics. No mitigation would be required.			
11. LAND USE AND PLANNING			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
12. MINERAL RESOURCES			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
13. NOISE			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
14. POPULATION AND HOUSING			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
15. PUBLIC SERVICES			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
16. RECREATION			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
17. TRANSPORTATION/TRAFFIC			
TRANSP-1: Department of Transportation Hauling/Traffic Permit: Prior to the start of any construction activities, the City shall acquire a permit	City of Holtville	Prior to Construction/City of Holtville	

from the Department of Transportation to operate or move a vehicle or combination of vehicles or special mobile equipment, of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code, on State Route 115 or any other facility under the jurisdiction of the Department of Transportation.			
TRANSP-2: Department of Transportation Encroachment Permit: Should any work within the Department of Transportation Right-of Way be required for the project, the City shall acquire an encroachment permit from the Department of Transportation prior to the start of construction activities within their Right-of-Way.	City of Holtville	Prior to Construction/City of Holtville	
TRANSP-3: Perpetuation of Monuments: Per Business and Profession Code 8771, perpetuation of survey monuments shall be carried out by a licensed land surveyor should any existing monuments be destroyed by construction activities related to the project.	City of Holtville	Prior to Construction/Contractor	
18. TRIBAL CULTURAL RESOURCES			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
19. UTILITIES AND SERVICE SYSTEMS			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation would be required.			
20. WILDFIRE			
The proposed project would not result in significant adverse impacts related to aesthetics. No mitigation			

would be required.			
21. MANDATORY FINDINGS OF SIGNIFICANCE			
MFS-1: The proposed project could have the potential to significantly impact the environment because it has the potential to impact wildlife and cultural resources during construction, however, mitigation measures BIO 1-4 and CR 1-10 have been put in place that would reduce the impacts to less than significant.	City of Holtville	Prior to construction/Project contractor	
MFS-2: The proposed project does have the potential to adversely affect humans via air quality during construction. Therefore, mitigation measures AQ 1 and AQ 2 will be implemented to reduce the impacts to be less than significant.	City of Holtville	Prior to construction/Project contractor	