State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
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December 5, 2025

Lucas Marsalek
California Department of Transportation
50 Higuera St
San Luis Obispo, CA 93401
Lucas.Marsalek@dot.ca.gov

Subject: MITIGATED NEGATIVE DECLARATION for the Vandenberg Village Pavement Preservation Project, SCH No. 2025101569, Santa Barbara County, CA

Dear Lucas Marsalek:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the California Department of Transportation (Caltrans) for the Vandenberg Village Pavement Improvement Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines[1].

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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 (Fish & G. Code, § 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 may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise

[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.

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[2] of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Caltrans

Objective: The objective of the Project is to repair and preserve 26.4 lane miles of pavement on State Route 1 in Santa Barbara County. Primary Project activities include removing 0.15 foot of pavement to maintain grade, laying rubberized hot mix overlay over the existing pavement, and laying gravel along the roadway edge to protect the pavement. Caltrans will repair three drainage locations along the project route utilizing reinforced concrete pipe, headwalls, and rock slope protection. Caltrans will also replace 1,900 linear feet of guardrails.

Location: This Project is located in Santa Barbara County along State Route 1 from postmile 23.0 (34.674231, -120.456984) to postmile 29.9 (34.750879, -120.520529), between Harris Grade Rd and California Blvd between Vandenberg Village and Vandenberg Space Force Base.

Timeframe: Construction is expected to occur from summer 2027 through winter 2027.

Biological Setting: The Project area is located north of the Santa Ynez River. It includes areas of low-density development, residential development, annual grasslands, riparian habitat, maritime chaparral, oak woodlands, coyote brush scrub, and agricultural areas. Central maritime chaparral habitat is considered to be a sensitive habitat. Thirteen creeks occur within the general Project area, including tributaries to the Santa Ynez River (California Department of Fish and Wildlife, 2025b). The Project area bisects the Burton Mesa Ecological Reserve on the southern end of the Project through two separate areas of the reserve.

Caltrans conducted botanical surveys on April 24, 2024, June 11, 2024, August 21, 2024, general wildlife surveys on April 23, 2024, June 11, 2024, July 30, 2024, August 21, 2024, and March 19, 2025, and wetland inventories on July 30, 2024 and March 19, 2025. During their surveys, Caltrans did not find any special status wildlife species or

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[2] "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

CDFW listed plants. No focused surveys for special status wildlife species have been conducted and none are proposed by Caltrans.

There are several state California Endangered Species Act (CESA) listed and candidate species that may occur within the Project area including: Crotch's bumble bee (*Bombus crotchii*; CESA candidate species), mountain lion (*Puma concolor*; CESA candidate species), and *Seaside Bird's Beak (Cordylanthus rigidus ssp. littoralis;* CESA listed endangered). Additional special-status species that may occur within the Project area include: monarch butterfly (*Danaus plexippus*; ESA proposed threatened), California red-legged frog (*Rana draytonii*; Endangered Species Act (ESA)-listed threatened), Western spadefoot toad (*Spea hammondii*; ESA proposed threatened), northern California legless lizard (*Anniella pulchra*; CDFW species of special concern (SSC)), coast horned lizard (*Phrynosoma blainvillii*; CDFW SSC), southwestern pond turtle (*Actinemys pallida*; ESA proposed threatened; CDFW SSC), coast patch-nosed snake (*Salvadora hexalepis virgultea*; CDFW SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; CDFW SSC), western red bat (Lasirus frantzii; CDFW SSC), American badger (*Taxidea taxus*; CDFW SSC), San Diego desert woodrat (*Neotoma lepida intermedia;* CDFW SSC), yellow warbler (Setophaga petechia; CDFW SSC), and Vandenberg Monkeyflower (*Diplacus vandenbergensis,* ESA-listed endangered).

The MND for this Project incorporates 39 avoidance, minimization, and/or mitigation measures, including measures for several special-status species which may or are likely to occur within the Project area.

COMMENTS AND RECOMMENDATIONS

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

COMMENT # 1: Wildlife Connectivity

Issue: The Project may adversely impact wildlife connectivity with the addition of rock slope protection (RSP) at the culvert inlets and outlets.

Specific impact: The proposed placement of RSP at the culvert inlets and outlets presents a significant barrier to wildlife movement and wildlife connectivity by preventing the movement of smaller amphibians and reptiles through the culvert.

Why impact would occur: The placement of RSP creates a barrier to smaller wildlife species attempting to traverse the area. RSP may result in entrapment, death, or injury to wildlife attempting to travel through the culverts (Langton and Clevenger 2017; Gunson and Huijser, 2019; Kentel, 2023). If culverts are not designed in accordance to Caltrans' Measures to Reduce Road Impacts on Amphibians and Reptiles in California:

Best Management Practices and Technical Guidance[3] document, then amphibians may not be able to traverse the roadway safely. Moreover, placement of RSP represents a permanent loss of connectivity in the area because it prevents smaller amphibians and reptiles from using the culverts to access suitable habitat. This impact is particularly concerning for special-status species such as western spadefoot toad and California red-legged frog, which rely on seasonal movement between upland and breeding habitats. Given the Project impacts to smaller wildlife species, including western spadefoot toad and California red-legged frog, the use of RSP at the various culverts within the Project area interferes with the intent of the Safe Roads and Wildlife Protection Act (AB2344), which requires Caltrans to prioritize wildlife connectivity when developing transportation projects.

Evidence impact may be significant: California wildlife is losing the ability to move as habitat conversion and built infrastructure disrupt species habitat and cut off migration corridors. California Fish and Game Code § 1955, subd. (c). directs the state to identify and protect wildlife corridors and connectivity areas, reinforcing the importance of maintaining functional movement pathways for wildlife. Changes to culvert design, such as adding RSP to culvert inlets and outlets, can represent direct changes in the environment that may significantly impact wildlife connectivity. Under CEQA Guidelines § 15065(a)(1), a project may have a significant effect on the environment if it substantially affects a species protected by CESA. Therefore, the Project's design may result in a significant impact unless feasible mitigation is incorporated.

Recommended Potentially Feasible Mitigation Measure(s)

To reduce potential impacts to wildlife connectivity and ensure wildlife passage is maintained through the culverts, CDFW recommends that Caltrans consider measures that facilitate safe movement of wildlife through the area. Fish and Game Code § 1955(c) directs the state to identify and protect wildlife corridors, and CEQA Guidelines § 15065(a)(1) recognize the impacts to listed species may be significant. CDFW requests the following measures are incorporated into the final CEQA document to help avoid or minimize these impacts:

Mitigation Measure #1: Culvert Design, Installation, and Use of Rock Slope Protection. Culverts and adjacent rock slope protection (RSP) shall be designed and installed to allow safe and effective passage of California red-legged frog, western toad, and other wildlife beneath the road. Culvert design and installation as part of this project shall follow the guidance in Measures to Reduce Road Impacts on Amphibians and Reptiles in California: Best Management Practices and Technical Guidance dated March 2021[4]. Culverts shall be sized large enough so they can be installed partially below grade to allow the accumulation of natural substrate on the culvert floor to support wildlife

[3] dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/bmp-guide-rev-4-16-2021-a11y.pdf
[4] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/bmp-guide-rev-4-16-2021-a11y.pdf

movement. The use of RSP at inlet and outlet of the culverts shall be avoided. If RSP is determined to be necessary, it shall be installed in a manner that maintains a flat, unobstructed wildlife movement path of at least 24 inches wide to and from the culvert inlet and outlet. If RSP is used, Caltrans shall identify and implement appropriate compensatory mitigation for the permanent impacts and the reduction of wildlife movement opportunities resulting from impaired passage for California red-legged frog, western toad, and other small wildlife.

COMMENT # 2: Monarch Butterfly

Issue: The Project may impact a monarch butterfly overwintering site within the Project area.

Specific impact: The removal of eucalyptus trees may directly impact overwintering monarchs or reduce overwintering habitat used by this species.

Why impact would occur: Monarchs are known to utilize eucalyptus trees as overwintering habitat in Santa Barbara County and are known to have a large overwintering site on the Vandenberg Space Force Base near the Project area (Frey and Schaffner, 2004). Additionally, portions of the Project area have been identified as overwintering habitat for monarch butterflies (California Department of Fish and Wildlife, 2025a). By operating heavy equipment near overwintering monarchs, impacting eucalyptus tree root systems, and removing/trimming eucalyptus trees, Caltrans risks directly and indirectly impacting overwintering monarchs.

The Natural Environmental Survey (NES) states that the available eucalyptus habitat does not have the appropriate microclimate for monarch presence and that no monarchs were observed during surveys. However, Saniee and Villablanca (2022) found no evidence to support that monarchs select for specific microclimates within available groves. Therefore, it is not unreasonable to expect that monarchs may choose to utilize the available habitat given the presence of a nearby known overwintering site for the species. Furthermore, general wildlife surveys were not conducted during the overwintering period for monarchs (between October 15 and March 15), limiting ability to detect seasonal use. The MND does not propose any avoidance, minimization, or avoidance measures for monarchs, not does it include surveys during the appropriate season.

Evidence impact may be significant: The monarch butterfly is included on CDFW's Terrestrial and Vernal Pool Invertebrates of Conservation Priority list and identified as a Species of Greatest Conservation Need in California's State Wildlife Action Plan (CDFW 2017; CDFW 2015). Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on monarch butterflies may require a mandatory finding of significance if the Project has the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). A reduction in monarch butterfly numbers, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures would result in the Project having a substantial adverse direct and cumulative effect, either directly or through habitat modification, on species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by Wildlife Agencies.

Recommended Potentially Feasible Mitigation Measure(s)

To protect monarch butterflies from direct and indirect impacts, CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #2: Seasonal Avoidance and Monitoring. Permittee shall make every effort to avoid construction activities from October 15 to March 15 to prevent impacts to overwintering monarchs. If construction must be scheduled during that time period, the project area shall be surveyed for monarchs by a Qualified Biologist with monarch experience and knowledge prior to project activities. Surveys shall be conducted every two weeks during the roosting season in areas of suitable habitat to determine whether monarchs are the site as an overwintering grove. If a roost is discovered, the area 500 feet surrounding the roost shall be monitored during start of construction to determine if construction activities are causing disturbances. If disturbances are observed, construction activities shall stop or be modified to eliminate the disturbance until the monarchs have migrated away on their own volition. In addition, a Qualified Biologist shall monitor the size of the population and to map the locations of roosting monarchs following the Xerces Society monarch count protocol[5].

Mitigation Measure #3: If more than three eucalyptus are removed or trimmed over 50%, and monarchs are observed within the Project area utilizing eucalyptus, Caltrans shall mitigate for the loss of potential habitat within the Project area with a 3:1 restoration ratio planting native trees known to be used by monarch for overwintering. Alternatively, Caltrans may choose to fund the same ratio of mitigation on nearby

[5] https://www.westernmonarchcount.org/wp-content/uploads/2022/10/WMC_MonarchCount_Instructions-Protocol_updated2022.pdf

conservation lands or plant fall or winter-blooming flowers near potential overwintering sites.

ADDITIONAL COMMENTS

<u>Recommended Measure Additions</u>. To ensure that wildlife and biological resources are adequately assessed prior to the start of project activities and to prevent impacts to water within stream channels during construction activities, CDFW recommends that the following measures are incorporated into the MND:

> **Species-Specific Surveys**. Several special-status species have the potential to be present during Project activities. To avoid Project impacts to these special-status species, Caltrans should conduct clearance surveys for these species immediately prior to the commencement of Project activities. If any special-status species are observed during these surveys, Caltrans should immediately contact CDFW for additional guidance on avoidance and minimization measures. These measures should be implemented prior to Project commencement. Additionally, if special-status species are observed, Caltrans should re-evaluate the Project's impact assessment and revise it as necessary for the species detected. CDFW may require additional avoidance, minimization, and/or mitigation beyond what is currently proposed in the MND, based on new information regarding species presence.

> **Vehicle Maintenance.** Any equipment or vehicles driven and/or operated adjacent to the stream/lake shall be checked and maintained daily, to prevent leaks of materials that could be deleterious to aquatic life if introduced into the water.

> **Pollution Prevention.** Stationary equipment such as motors, pumps, generators, and welders, located within or adjacent to the stream or lake shall be positioned over drip pans. Stationary heavy equipment shall have suitable containment to manage a catastrophic spill or leak. Clean up equipment such as extra boom, absorbent pads, and skimmers shall be on site prior to the start of Project-related activities. No equipment maintenance shall occur within or near any stream channel or lake margin where petroleum products or other pollutants could enter these areas under any flow conditions.

<u>Recommended Measure Modifications</u>. To ensure that surveys accurately detect any special-status species which may be present within the Project area, that protective measures are implemented effectively, and that CDFW is kept informed in a timely manner during Project activities, CDFW recommends that Caltrans revise the following Avoidance, Minimization, and/or Mitigation Measures with the addition of underlined language and the removal of strikethrough language.

> **BIO-4**. Pre-construction surveys shall be conducted <u>during the appropriate season</u> by a qualified biologist <u>with expertise in special status plant survey</u>

protocols and identification prior to any ground disturbing activities to confirm the presence or absence of special-status plant species.

BIO-15. If a California Red-legged Frog is found, work activities shall cease immediately within 100-feet of the California Red-legged Frog and agency consultation with the U.S. Fish and Wildlife Service shall be initiated, and CDFW shall be contacted.

BIO-17. If a Western Spadefoot Toad is observed within 100-feet of the Area of Potential Impacts during construction, all work must be immediately ceased within 100-feet of the Western Spadefoot Toad and U.S. Fish and Wildlife Service, CDFW, and Caltrans will be contacted within 48 hours. Caltrans will then reinitiate Federal Endangered Species Act Section 7 formal consultation with U.S. Fish and Wildlife Service for Western Spadefoot Toad and implement additional avoidance and minimization measures as necessary.

BIO-22. Observations of Species of Special Concern or other special-status species will be documented on California Natural Diversity Database forms and submitted to California Department of Fish and Wildlife ~~upon project completion~~ within one month of observation.

BIO-24. Prior to construction, vegetation removal shall be scheduled to occur from September 12 to January 31 outside of the typical maternity roosting season~~, if possible,~~ to avoid potential impacts to roosting bats. If tree removal or other construction activities are proposed to occur within 250~~100~~ feet of potential habitat during the maternity season (February 1 to September 1), a roosting bat survey shall be conducted by a biologist ~~who is determined to be qualified by Caltrans~~ with expertise and experience with surveying/studying bat maternity colonies within fourteen days prior to construction. If an active roost is found, a qualified Caltrans biologist will determine an appropriate buffer based on the habits and needs of the species. The buffer area shall be avoided until a qualified biologist has determined that roosting activity has ceased. Caltrans shall follow their internal guidance document Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions[6] when designing surveys and establishing appropriate buffer distances.

BIO-33. No less than 14 days and no more than 30 days prior to any construction activities or any project activity likely to impact the American Badger, a preconstruction survey shall be conducted. The status of all dens should be determined and mapped. Known dens, if found occurring within the footprint of the activity, or within 200-feet of the activity, shall be monitored for three days to determine the current use. If American Badger activity is observed during this period, the den shall be monitored for at least five consecutive days from the time

[6] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf

of observation to allow any resident animal to move to another den during its normal activity. If the animal does not move within 5 days, or there are signs of young, CDFW shall be consulted and an appropriate buffer shall be established around the den.

BIO-35. Maintenance and construction excavations ~~greater than two-feet deep~~ shall be covered (i.e., with plywood, sturdy plastic, steel plates, or equivalent), filled in at the end of each working day, or have earthen escape ramps no greater than 200-feet apart to prevent trapping American Badger or other wildlife.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB website[7] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[8].

Caltrans should ensure data collected for the preparation of the MND is properly submitted.

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

[7] https://wildlife.ca.gov/Data/CNDDB/Submitting-Data
[8] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

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 Caltrans in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that Caltrans has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Mackenzie Rich[9], Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:
Heather A. Pert
DF423498814B441...

Heather A. Pert
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Heather A. Pert, Environmental Program Manager
Erika Cleugh, Senior Environmental Scientist (Supervisor)
Mackenzie Rich, Senior Environmental Scientist (Specialist)

Office of Planning and Research
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REFERENCES

California Department of Fish and Wildlife (2025a, April 16). *Monarch Overwintering Areas - ACE* [ds2861]. Calif. Dept. of Fish and Wildlife. Biogeographic Information and Observation System (BIOS). Retrieved November 14, 2025, from https://bios.dfg.ca.gov.

[9] Phone: (805) 623-2291; Email: Mackenzie.Rich@wildlife.ca.gov

California Department of Fish and Wildlife (2025b, June 5). *California Aquatic Resources Inventory (CARI) Streams – SFEI* [ds2836]. Calif. Dept. of Fish and Wildlife. Biogeographic Information and Observation System (BIOS). Retrieved November 19, 2025, from https://bios.dfg.ca.gov.

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	**Timing**	**Responsible Party**
Mitigation Measure #1: Culvert Design, Installation, and Use of Rock Slope Protection. Culverts and adjacent rock slope protection (RSP) shall be designed and installed to allow safe and effective passage of California red-legged frog, western toad, and other wildlife beneath the road. Culvert design and installation as part of this project shall follow the guidance in Measures to Reduce Road Impacts on Amphibians and Reptiles in California: Best Management Practices and Technical Guidance dated March 2021. Culverts shall be sized large enough so they can be installed partially below grade to allow the accumulation of natural substrate on the culvert floor to support wildlife movement. The use of RSP at inlet and outlet of the culverts shall be avoided. If RSP is determined to be necessary, it shall be installed in a manner that maintains a flat, unobstructed wildlife movement path of at least 24 inches wide to and from the culvert inlet and outlet. If RSP is used, Caltrans shall identify and implement appropriate compensatory mitigation for the permanent impacts and the reduction of wildlife movement opportunities resulting from impaired passage for California red-legged frog, western toad, and other small wildlife.	Prior to construction	Caltrans
Mitigation Measure #2: Seasonal Avoidance and Monitoring. Permittee shall make every effort to avoid construction activities from October 15 to March 15 to prevent impacts to overwintering monarchs. If construction must be scheduled during that time period, the project area shall be surveyed for monarchs by a Qualified Biologist with monarch experience and knowledge prior to project activities. Surveys shall be conducted every two weeks during the roosting season in areas of suitable habitat to determine whether monarchs are the site as an overwintering grove. If a roost is discovered, the area 500 feet surrounding the roost shall be monitored during start of	Prior to and during construction	Caltrans

construction to determine if construction activities are causing disturbances. If disturbances are observed, construction activities shall stop or be modified to eliminate the disturbance until the monarchs have migrated away on their own volition. In addition, a Qualified Biologist shall monitor the size of the population and to map the locations of roosting monarchs following the Xerces Society monarch count protocol.		
Mitigation Measure #3: If more than three eucalyptus are removed or trimmed over 50%, and monarchs are observed within the Project area utilizing eucalyptus, Caltrans shall mitigate for the loss of potential habitat within the Project area with a 3:1 restoration ratio planting native trees known to be used by monarch for overwintering. Alternatively, Caltrans may choose to fund the same ratio of mitigation on nearby conservation lands or plant fall or winter-blooming flowers near potential overwintering sites.	During and after construction	Caltrans
Recommendation #1: Species-Specific Surveys. Several special-status species have the potential to be present during Project activities. To avoid Project impacts to these special-status species, Caltrans should conduct clearance surveys for these species immediately prior to the commencement of Project activities. If any special-status species are observed during these surveys, Caltrans should immediately contact CDFW for additional guidance on avoidance and minimization measures. These measures should be implemented prior to Project commencement. Additionally, if special-status species are observed, Caltrans should re-evaluate the Project's impact assessment and revise it as necessary for the species detected. CDFW may require additional avoidance, minimization, and/or mitigation beyond what is currently proposed in the MND, based on new information regarding species presence.	Prior to and during construction	Caltrans
Recommendation #2: Vehicle Maintenance. Any equipment or vehicles driven and/or operated adjacent to the stream/lake shall be checked and maintained daily, to prevent leaks of materials that could be deleterious to aquatic life if introduced into the water.	Prior to and during construction	Caltrans

Recommendation #3: Pollution Prevention. Stationary equipment such as motors, pumps, generators, and welders, located within or adjacent to the stream or lake shall be positioned over drip pans. Stationary heavy equipment shall have suitable containment to manage a catastrophic spill or leak. Clean up equipment such as extra boom, absorbent pads, and skimmers shall be on site prior to the start of Project-related activities. No equipment maintenance shall occur within or near any stream channel or lake margin where petroleum products or other pollutants could enter these areas under any flow conditions.	During construction	Caltrans
Recommendation #4: BIO-4. Pre-construction surveys shall be conducted during the appropriate season by a qualified biologist with expertise in special status plant survey protocols and identification prior to any ground disturbing activities to confirm the presence or absence of special-status plant species.	Prior to construction	Caltrans
Recommendation #5: BIO-15. If a California Red-legged Frog is found, work activities shall cease immediately within 100-feet of the California Red-legged Frog and agency consultation with the U.S. Fish and Wildlife Service shall be initiated, and CDFW shall be contacted.	Prior to and during construction	Caltrans
Recommendation #6: BIO-17. If a Western Spadefoot Toad is observed within 100-feet of the Area of Potential Impacts during construction, all work must be immediately ceased within 100-feet of the Western Spadefoot Toad and U.S. Fish and Wildlife Service, CDFW, and Caltrans will be contacted within 48 hours. Caltrans will then reinitiate Federal Endangered Species Act Section 7 formal consultation with U.S. Fish and Wildlife Service for Western Spadefoot Toad and implement additional avoidance and minimization measures as necessary.	Prior to and during construction	Caltrans
Recommendation #7: BIO-22. Observations of Species of Special Concern or other special-status species will be documented on California Natural Diversity Database forms and submitted to California Department of Fish and Wildlife within one month of observation.	Prior to and during construction	Caltrans

Recommendation #8: BIO-24. Prior to construction, vegetation removal shall be scheduled to occur from September 12 to January 31 outside of the typical maternity roosting season, to avoid potential impacts to roosting bats. If tree removal or other construction activities are proposed to occur within 250-feet of potential habitat during the maternity season (February 1 to September 1), a roosting bat survey shall be conducted by a biologist with expertise and experience with surveying/studying bat maternity colonies within fourteen days prior to construction. If an active roost is found, a qualified Caltrans biologist will determine an appropriate buffer based on the habits and needs of the species. The buffer area shall be avoided until a qualified biologist has determined that roosting activity has ceased. Caltrans shall follow their internal guidance document Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions when designing surveys and establishing appropriate buffer distances.	Prior to and during construction	Caltrans
BIO-33. No less than 14 days and no more than 30 days prior to any construction activities or any project activity likely to impact the American Badger, a preconstruction survey shall be conducted. The status of all dens should be determined and mapped. Known dens, if found occurring within the footprint of the activity, or within 200-feet of the activity, shall be monitored for three days to determine the current use. If American Badger activity is observed during this period, the den shall be monitored for at least five consecutive days from the time of observation to allow any resident animal to move to another den during its normal activity. If the animal does not move within 5 days, or there are signs of young, CDFW shall be consulted and an appropriate buffer shall be established around the den.	Prior to and during construction	Caltrans
BIO-35. Maintenance and construction excavations greater than two-feet deep shall be covered (i.e., with plywood, sturdy plastic, steel plates, or equivalent), filled in at the end of each working day, or have earthen escape ramps no greater than 200-feet apart to prevent trapping American Badger or other wildlife.	During construction	Caltrans