# Interstate 40 Minor Pavement Rehabilitation Project

San Bernardino County, California
District 08-SBd-40 (PM R15.0/R28.8)
EA 08-1M390/PN 0821000106

## Initial Study with Proposed Mitigated Negative Declaration

Prepared by the
State of California Department of Transportation

**December 2025**

## General Information About This Document

**What's in this document:**

The California Department of Transportation (Caltrans) has prepared this Initial Study (IS), which examines the potential environmental impacts of alternatives being considered for the proposed Project in San Bernardino County, California. Caltrans is the lead agency under the California Environmental Quality Act (CEQA). The document describes the Project, the existing environment that could be affected by the Project, potential impacts, and proposed avoidance, minimization, and/or mitigation measures.

**What you should do:**

- Please read this document.
- Copies of this document and the related technical studies, are available for review at 464 West 4th Street, San Bernardino, CA 92401-1400.
- We welcome your comments. If you have any comments about the proposed project, please send your written comments to Caltrans by the deadline.
- Submit comments via U.S. mail to Caltrans at the following address:
  Kourtney Graves, (Acting) Senior Environmental Planner, Environmental Studies C
  California Department of Transportation, District 8
  464 West 4th Street, MS827
  San Bernardino, CA 92401-1400
- Submit comments via email to: Interstate40MinorPavement@dot.ca.gov
- Be sure to send comments by the deadline: **January 10, 2026**

**What happens next:**

After comments are received from the public and reviewing agencies, Caltrans may: (1) give environmental approval to the proposed Project, (2) perform additional environmental studies, or (3) abandon the Project. If the Project is given environmental approval and funding is appropriated, Caltrans could design and build all or part of the Project.

**Alternative formats:**

For individuals with sensory disabilities, this document can be made available in Braille, in large print, on audiocassette, or on computer disk. To obtain a copy in one of these alternate formats, please call or write to Caltrans, Attn: Kourtney Graves, 464 West 4th Street, MS827, San Bernardino, CA 92401-1400, (909) 472-1362 (Voice), or use the California Relay Service 1(800) 735-2929 (TTY to Voice), 1(800) 735-2922 (Voice to TTY), 1(800) 855-3000 (Spanish TTY to Voice and Voice to TTY), 1(800) 854-7784 (Spanish and English Speech-to-Speech) or 711.

SCH#XXXXXXX
08-SBd-40 PM 15.0/28.8
EA 08-1M390/0821000106

Conduct minor pavement rehabilitation on Interstate 40 in San Bernardino County, California.

# DRAFT INITIAL STUDY
# with Proposed Mitigated Negative Declaration

Submitted Pursuant to: (State) Division 13, California Public Resources Code

THE STATE OF CALIFORNIA
Department of Transportation

Antonia Toledo
Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 8
CEQA Lead Agency

12/03/2025
Date

The following persons may be contacted for more information about this document:
Kourtney Graves, Acting Senior Environmental Planner, Caltrans District 8, 464 West 4th Street, MS-820
San Bernardino, CA 92401-1400, (909) 472-1362, kourtney.graves@dot.ca.gov

**State Clearinghouse #**
# Proposed Mitigated Negative Declaration
**Pursuant to Division 13, Public Resources Code**

## Project Description

The California Department of Transportation (Caltrans) proposes to install 0.15-ft thick Rubberized Hot Mix Asphalt-Gap (RHMA-G) overlay on the Interstate 40 (I-40) mainline and shoulders; construct 0.4-ft thick localized digouts (10% of total Asphalt Concrete [AC]); replace AC dikes; upgrade existing metal beam guardrail to Midwest Guardrail System (MGS); replace rock slope protection (RSP) under two bridges at Gas Line Wash (Bridge No. 54-0715 L/R) due to inadequate rock type and size; replace traffic sign panels with type XI retro-reflective sheeting to meet federal requirements, and replace four culverts in poor or fair condition under Drainage Restoration program in order to protect the embankment and roadway from potential failure. The pavement grinding would include the removal of thermoplastic traffic stripes. Lane closure would be required to minimize traffic impact during construction and to ensure the safety of the traveling public and construction workers. Construction is expected in the night time and 8 hours a night.

The new MGS at the bridge locations will be connected to a new concrete barrier transition at the beginning and the end of each bridge railing. The concrete barrier transition will be attached through drilling and bonding into the existing bridge railing. Asbestos testing may be required for the existing bridge railing. No other bridge work is planned. Below is the list of all bridges that require concrete barrier transition:

- Gas Line Wash – Bridge No. 54-0715 R/L;
- Twin Hills Wash – Bridge No. 54-0716 R/L;
- Crest Wash – Bridge No. 54-0717 R/L;
- W Newberry Road Undercrossing – Bridge No. 54-0708 R/L;
- Newberry Road Overcrossing – Bridge No. 54-0709;
- Fort Cady Road Overcrossing – Bridge No. 54-0710

All work is expected to be performed within the existing Caltrans right of way.

## DRAFT Determination

This proposed Mitigated Negative Declaration (MND) is included to give notice to interested agencies and the public that it is Caltrans' intent to adopt an MND for this Project. This does not mean that the Department's decision regarding the Project is final. This MND is subject to change based on comments received by interested agencies and the public.

Caltrans has prepared an IS for this Project, and pending public review, expects to determine from this study that the proposed Project would not have a significant effect on the environment for the following reasons:

- The proposed Project would have no effect on aesthetics, agriculture and forestry resources, air quality, cultural resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utility and service systems, and wildfires.
- The proposed Project would have less than significant effects to greenhouse gas emissions, hazards and hazardous materials.
- With the following mitigation measure incorporated, the proposed Project would have less than significant effects to biological resources:

  **BIO-Desert Tortoise Mitigation:** Caltrans proposes to mitigate for temporary and permanent impacts within desert tortoise critical habitat. Additionally, Caltrans proposes to mitigate for temporary and permanent impacts within suitable desert tortoise habitat.

_____ _____

Antonia Toledo Date
Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 8

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# **Chapter 1** Proposed Project

## Introduction

The California Department of Transportation (Caltrans) proposes to install 0.15-ft thick Rubberized Hot Mix Asphalt-Gap (RHMA-G) overlay on the Interstate 40 (I-40) mainline and shoulders; construct 0.4-ft thick localized digouts (10% of total Asphalt Concrete [AC]); replace AC dikes; upgrade existing metal beam guardrail to Midwest Guardrail System (MGS); replace rock slope protection (RSP) under two bridges at Gas Line Wash (Bridge No. 54-0715 L/R) due to inadequate rock type and size; replace traffic sign panels with type XI retro-reflective sheeting to meet federal requirements, and replace four culverts in poor or fair condition under Drainage Restoration program in order to protect the embankment and roadway from potential failure. The pavement grinding would include the removal of thermoplastic traffic stripes. Lane closure would be required to minimize traffic impact during construction and to ensure the safety of the traveling public and construction workers. Construction is expected in the night time for approximately 8 hours a night. The Regional Vicinity, Local Vicinity, and Project Layout maps are shown in Figures 1, 2, and 3.

Caltrans is the lead agency under the California Environmental Quality Act (CEQA).

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**Figure 1**
**Regional Vicinity**
**I-40 Minor Pavement Rehabilitation Project**
**EA 08-1M390/PN 0821000106**

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**Figure 2**
**Local Vicinity**
**I-40 Minor Pavement Rehabilitation Project**
**EA 08-1M390/PN 0821000106**

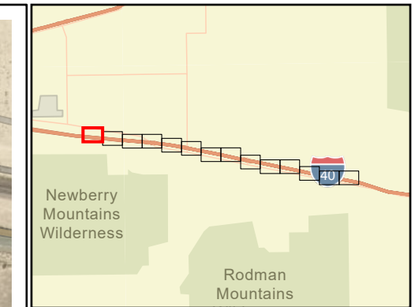


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**Figure 3, Sheet 1 of 14**
**Project Layout**
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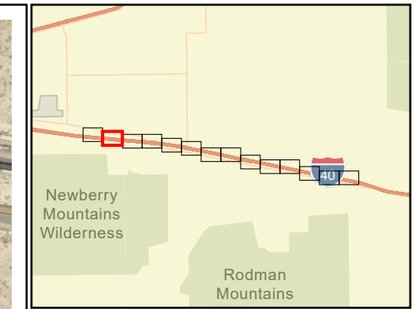


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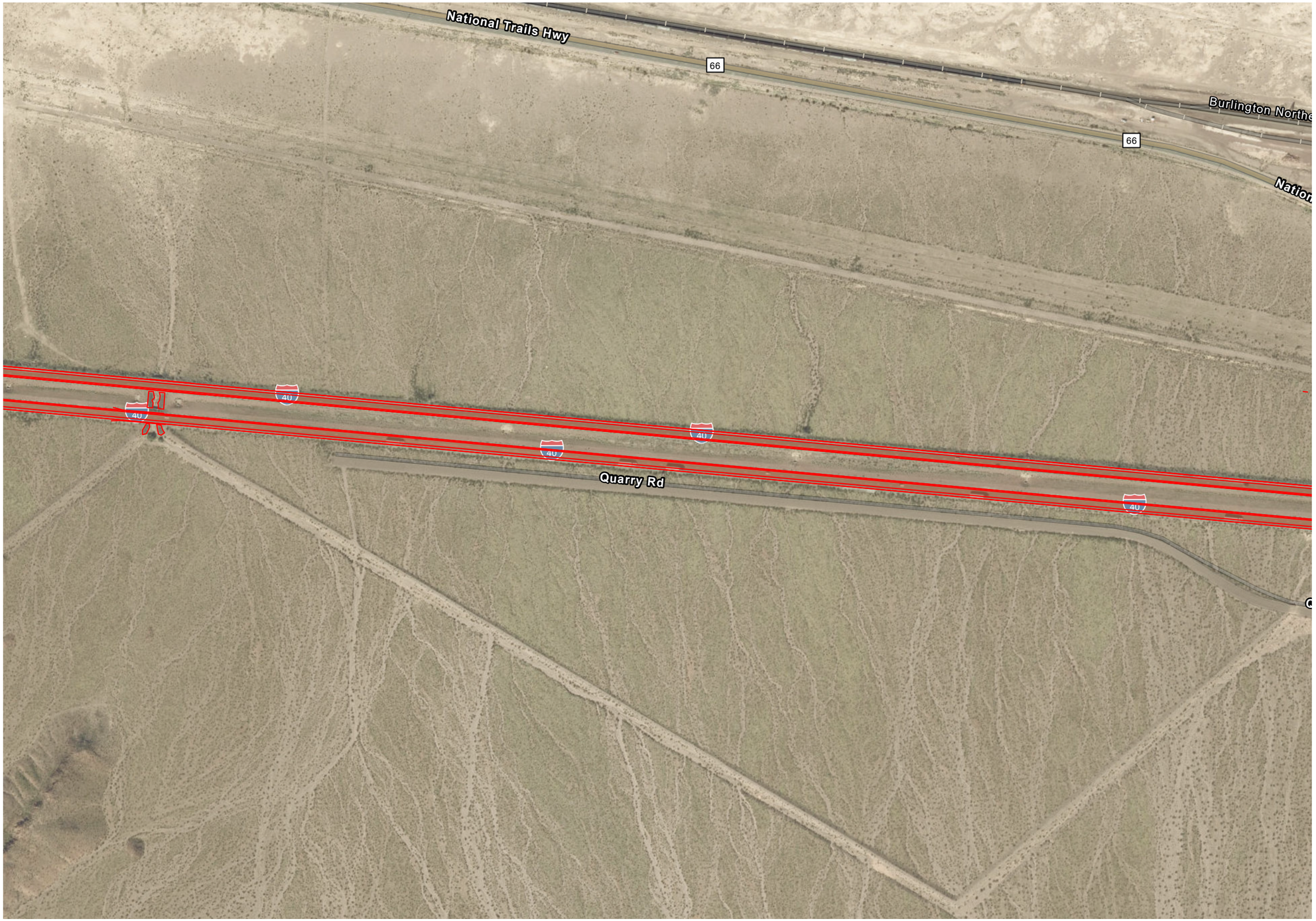


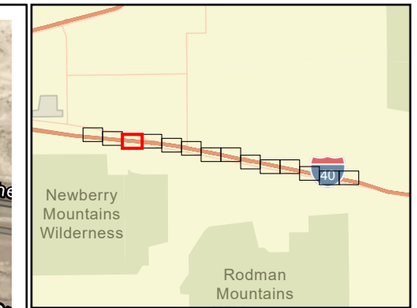


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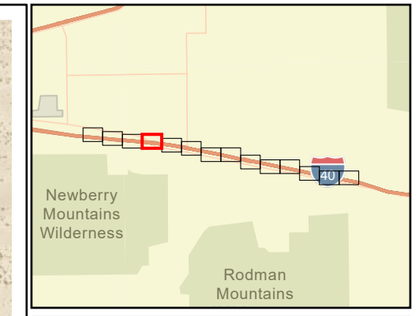


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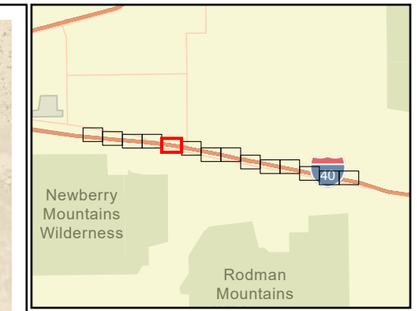


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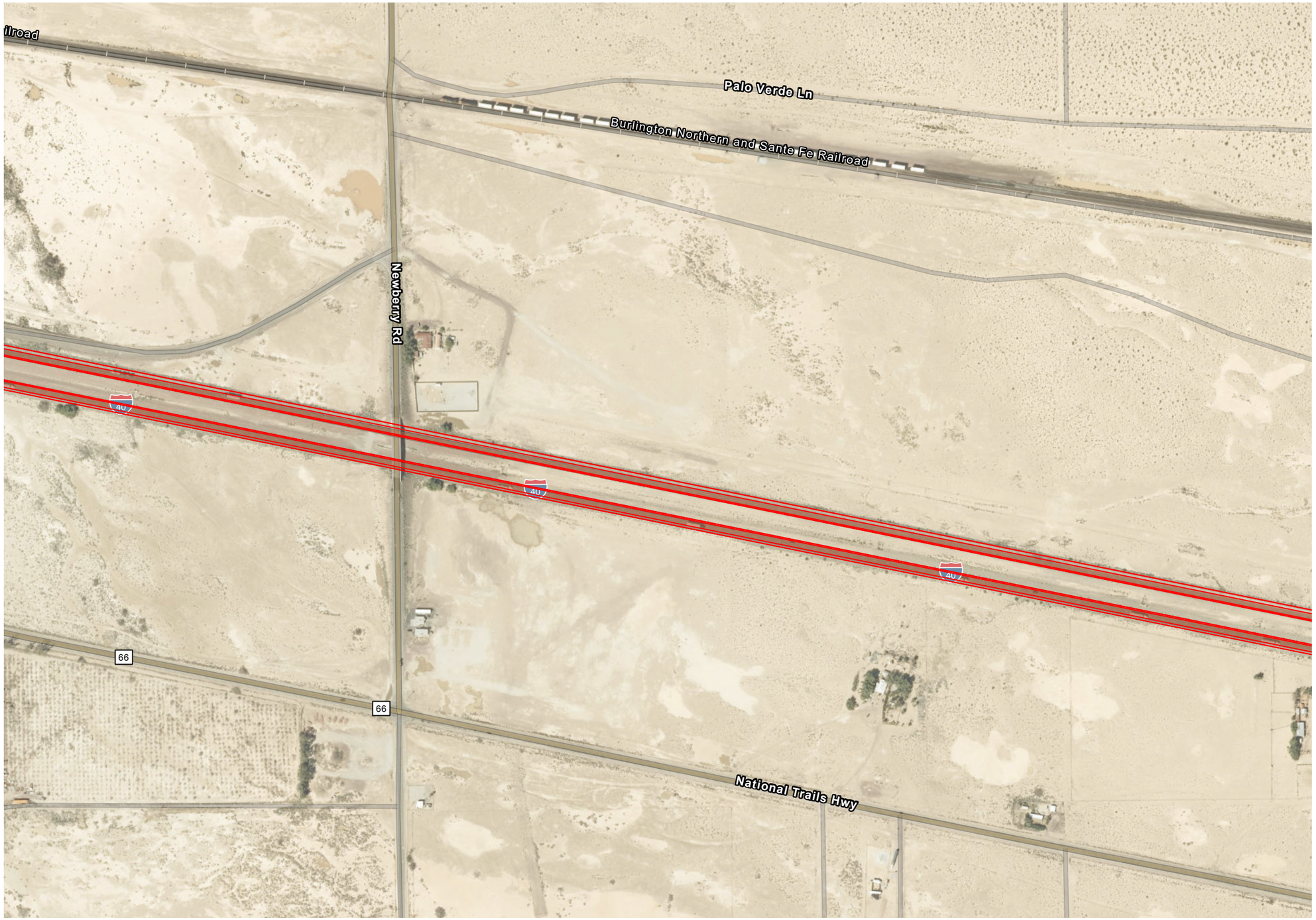


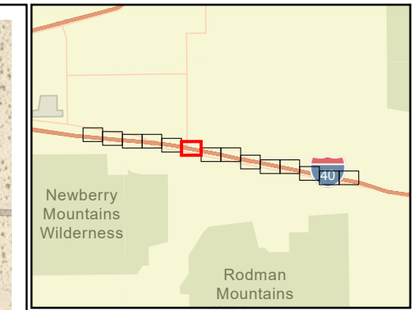


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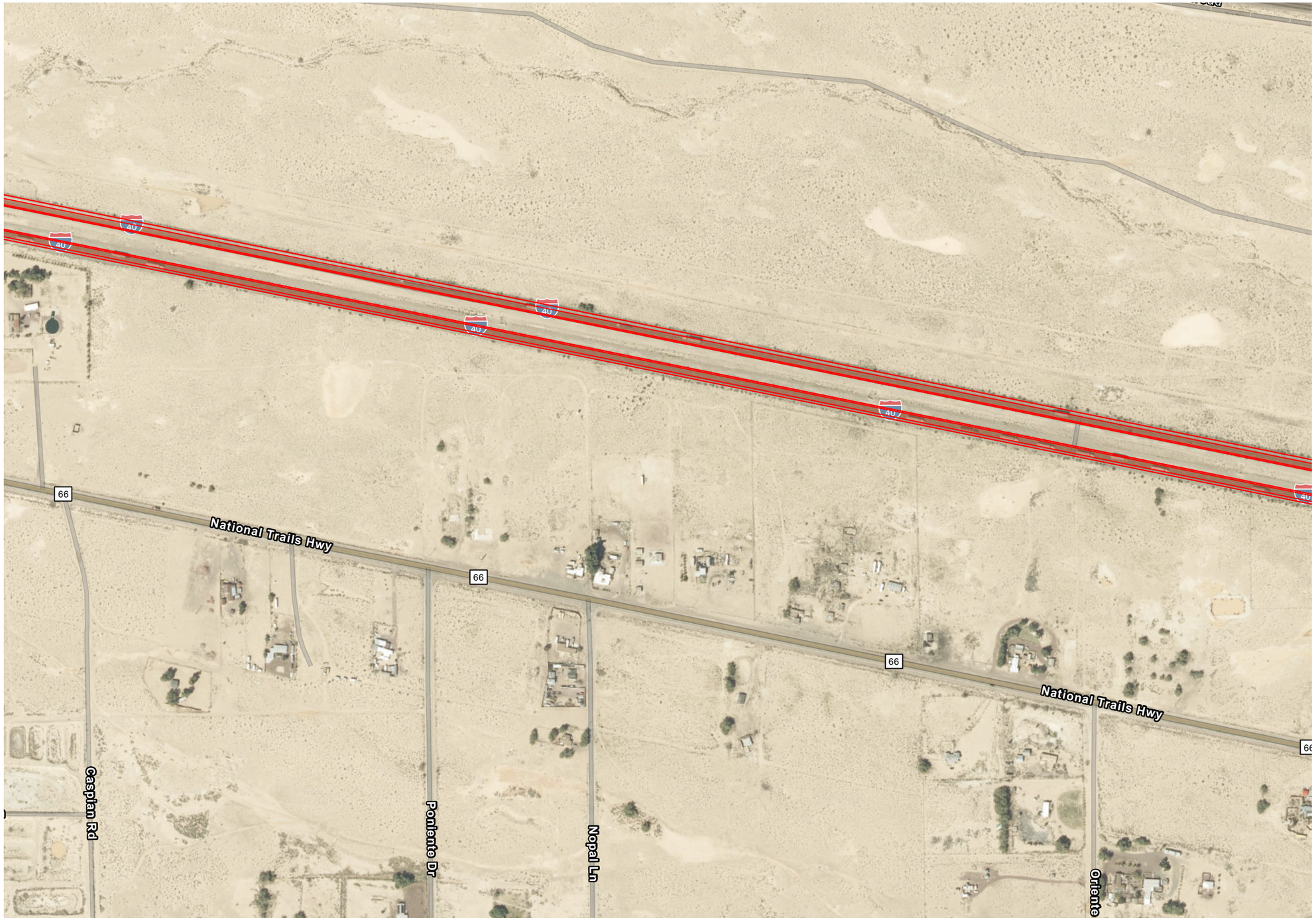


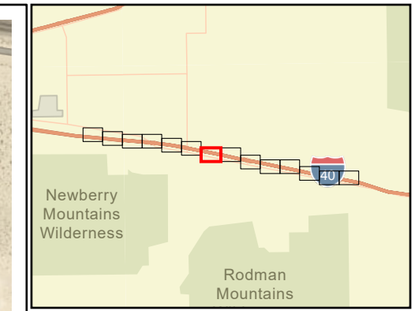


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**Figure 3, Sheet 7 of 14**
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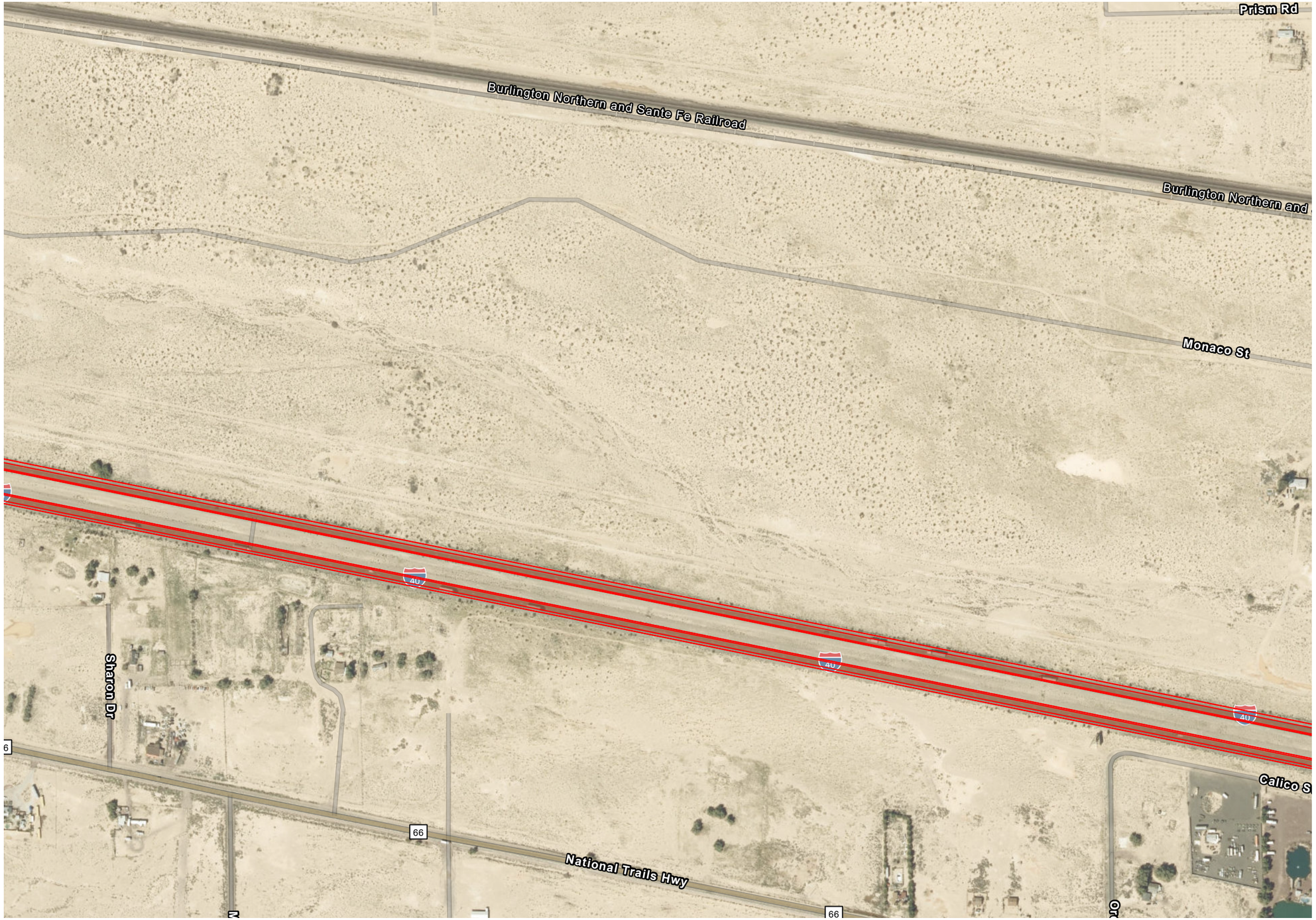


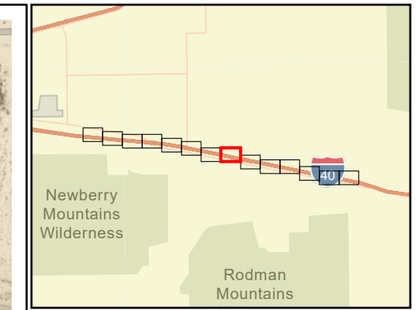


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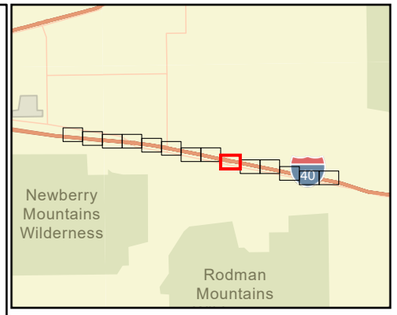


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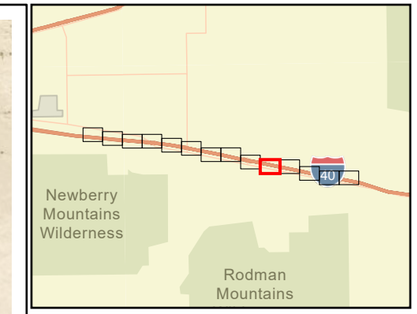


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**Figure 3, Sheet 10 of 14**
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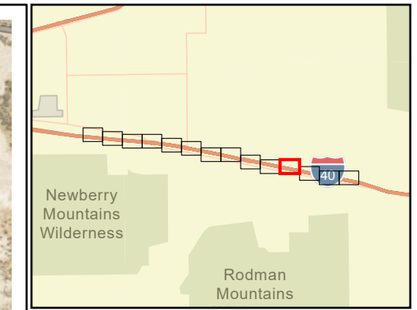


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**Figure 3, Sheet 11 of 14**
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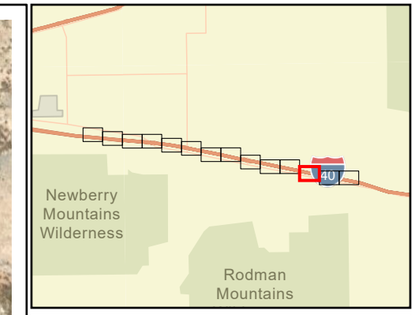


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**Figure 3, Sheet 12 of 14**
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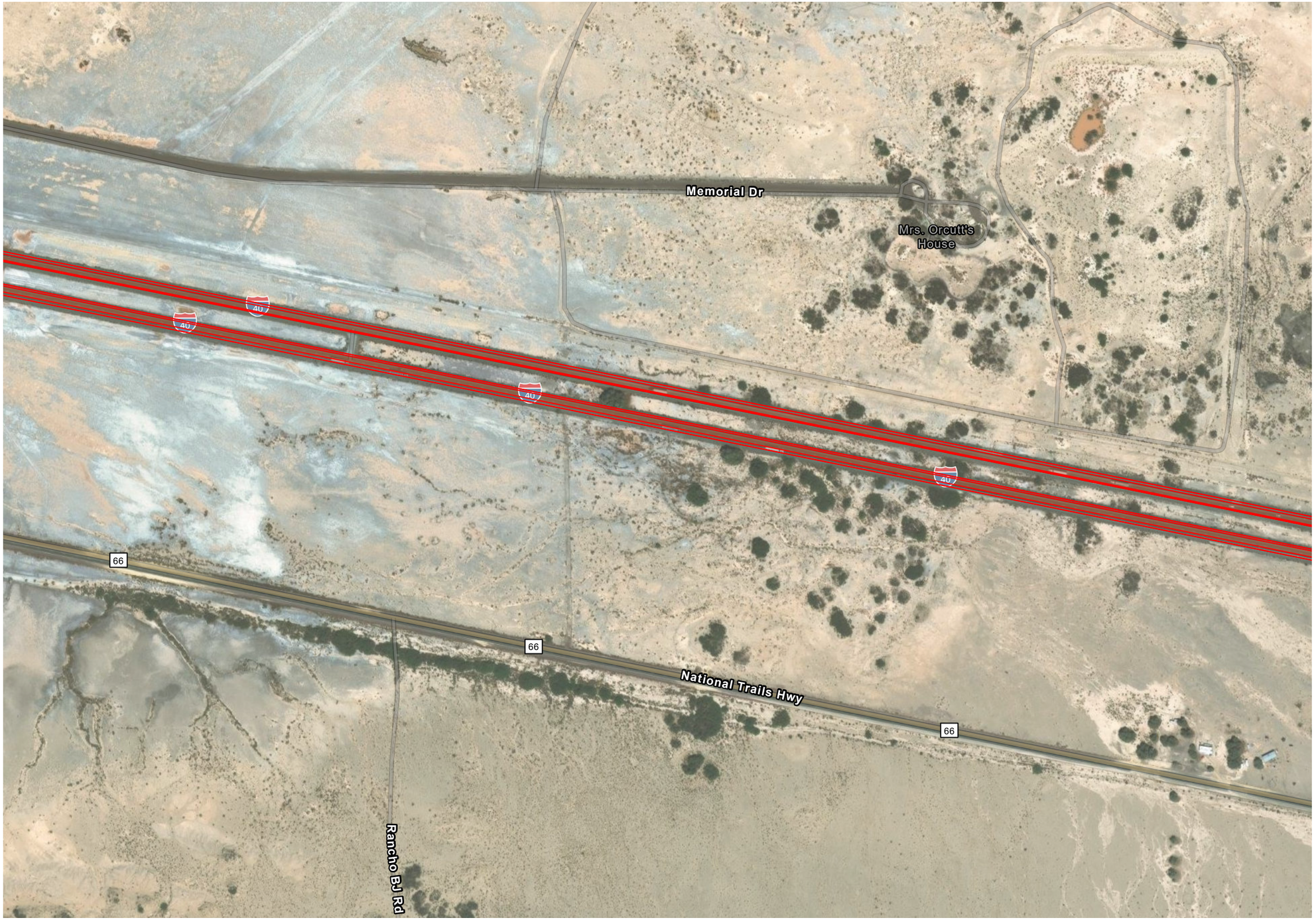


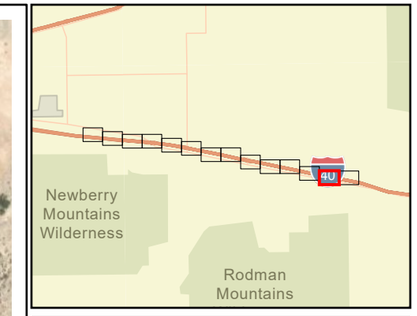


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**Figure 3, Sheet 13 of 14**
**Project Layout**
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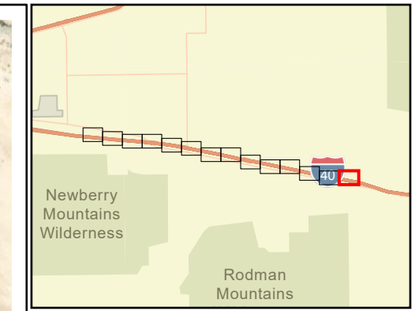


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**Figure 3, Sheet 14 of 14**
**Project Layout**
**I-40 Minor Pavement Rehabilitation Project**

## Existing Facility

Interstate 40 (I-40) is a major east-west interstate highway that stretches from Barstow, California to Wilmington, North Carolina. The I-15 in California traverses through the Inland Empire and across the Mojave Desert in San Bernardino County, towards the City of Needles before it crosses over the Colorado River into Arizona.

## Project Background

This portion of I-40 experiences continuous traffic and the existing pavement within the Project limits is exhibiting minor distress and deterioration in the form of rutting and faulting of the roadway pavement. The four culverts within the Project limits and RSP for two bridges at Gas Line Wash are also currently in fair to poor conditions.

## Project Purpose and Need

### Purpose

The purpose of the Project is to preserve, repair, and extend the life of the existing pavement and to improve the ride quality. Also, it is to bring the identified four culverts and RSP for two bridges at Gas Line Wash to a state of good condition and to restore and extend their service life.

### Need

The 2019 Pavement Condition Report (Pave M) indicates that the pavement within the Project limits exhibits minor distress and is beginning to manifest a fair amount of rutting and faulting. In addition, four culverts within the Project limits and RSP for two bridges at Gas Line Wash are currently classified as being in fair or poor condition. If left uncorrected, these culverts and RSP will deteriorate further and will require a major rehabilitation.

## Project Description

This section describes the proposed Project alternatives that were developed while avoiding or minimizing environmental impacts. The alternatives are the No-Build Alternative and the Build Alternative (proposed Project).

*No-Build Alternative*

The No-Build Alternative would maintain the facility in its current condition. No improvements would be implemented to I-40. As such, no capital cost is associated with this alternative. This portion of I-40 would continue to result in pavement deficiencies. Furthermore, the four culverts within the Project limits and RSP for the two bridges at Gas Line Wash would continue to deteriorate from their current classification of fair to poor condition.

*Build Alternative*

The Build Alternative proposes the following:

- Install 0.15-foot (ft) thick Rubberized Hot Mix Asphalt-Gap (RHMA-G) overlay on mainline and shoulders;
- Construct 0.4-ft thick localized digouts [10 percent of total Asphalt Concrete (AC)];
- Replace AC dikes;
- Upgrade existing metal beam guardrail to Midwest Guardrail System (MGS);
- Replace rock slope protection (RSP) under two bridges at Gas Line Wash (Bridge No. 54 0715 L/R) due to inadequate rock type and size;
- Replace traffic sign panels with type XI retro-reflective sheeting to meet Federal requirements; and
- Replace four culverts in poor or fair condition under Drainage Restoration program in order to protect the embankment and roadway from potential failure.

The pavement griding would include the removal of thermoplastic traffic stripes. Lane closures would be required to minimize traffic impact during construction and to ensure the safety of the traveling public and construction workers. Construction is expected in the nighttime for 8 hours a night.

The new MGS at the bridge locations will be connected to a new concrete barrier transition at the beginning and the end of each bridge railing. The concrete barrier transition will be attached through drilling and bonding into the existing bridge railing. Asbestos testing may be required for the existing bridge railing. No other bridge work is planned. Below is the list of all the bridges that require concrete barrier transition:

- Gas Line Wash – Bridge 54-0715 R/L;
- Twin Hills Wash – Bridge 54-0716 R/L;
- Crest Wash – Bridge 54-0717 R/L:
- W Newberry Road undercrossing (UC) – Bridge 54-0708 R/L;
- Newberry Road overcrossing (OC) – Bridge 54-0709;
- Fort Cady Road OC – Bridge 54-0710.

All work is expected to be performed within the existing Caltrans right of way.

## Permits and Approvals Needed

The following permits, licenses, agreements, and certifications listed in Table 1-1 would be required for Project construction:

## Table 1-1. Required Permits, Reviews, and Approvals

| Agency | Permit/Approval | Status |
|---|---|---|
| California Department of Fish and Wildlife (CDFW) | 1602 Streambed Alteration Agreement | Caltrans would apply during the Plans, Specifications and Estimates (final design) phase of the Project. |
| State Water Resources Control Board (SWRCB) | National Pollutant Discharge Elimination System (NPDES) Statewide Stormwater Permit (order No. 2022-0033-DWQ, NPDES No. CAS000003) and Construction General Permit (Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002) | Caltrans is under authority for both permits and would submit a Notice of Intent to implement the Construction General Permit. |
| Regional Water Quality Control Board (RWQCB) | Porter-Cologne Water Quality Control Act and Clean Water Act Section 401 Water Quality Certification | Caltrans would apply during the Plans, Specifications and Estimates (final design) phase of the Project. |
| U.S. Army Corps of Engineers (USACE) | Section 404 Nationwide Permit (NWP) | Caltrans would apply during the Plans, Specifications and Estimates (final design) phase of the project. |

# Chapter 2 California Environmental Quality Act (CEQA) Evaluation

## 2.1 CEQA Environmental Checklist

This checklist identifies physical, biological, social, and economic factors that might be affected by the proposed Project. In many cases, background studies performed in connection with the Project indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words “significant” and “significance” used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

Project features, which can include both design elements of the project, and standardized measures that are applied to all or most Caltrans projects such as Best Management Practices (BMPs) and measures included in the Standard Plans and Specifications or as Standard Special Provisions, are considered to be an integral part of the project and have been considered prior to any significance determinations documented below; see Chapters 1 and 2 for a detailed discussion of these features. The annotations to this checklist are summaries of information contained in Chapter 2 in order to provide the reader with the rationale for significance determinations; for a more detailed discussion of the nature and extent of impacts, please see Chapter 2. This checklist incorporates by reference the information contained in Chapters 1 and 2.

## I. Aesthetics

| Question | CEQA Determination |
|---|---|
| a) Have a substantial adverse effect on a scenic vista? | No Impact |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | No Impact |
| c) In non-urbanized 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 a 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? | No Impact |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | No Impact |

**Response to Items a), b), c), and d): No Impact.** The Project is located in San Bernardino County along I-40 near the community of Newberry Springs, east of the City of Barstow and extending southeast along I-40 to the Desert Oasis Rest Area. The Project site consists of relatively flat topography with very little change in elevation in the Mojave desert basin with views of the distant mountain ranges. According to the Caltrans California State Scenic Highway Map, I-40 is not officially designated as a state scenic highway but is designated eligible as a state scenic highway throughout the Project area. The Project includes pavement rehabilitation and other improvements along I-40 such as upgrades to guardrails, replacing RSP under two bridges, and replacing culverts and would not impair views of the desert basin or mountain ranges. Implementation of the Project would result in minimal visual changes to the environment with no visual resource impacts. As such, impacts to aesthetics are not anticipated to occur with implementation of the Project.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization, and/or mitigation measures are not required for Aesthetics.

## 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 the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

| Question | CEQA Determination |
|---|---|
| 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 |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | 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 51104(g))? | No Impact |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | No Impact |
| 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 |

**Response to Item a): No Impact.** According to the California Department of Conservation Farmland Mapping and Monitoring Program, there are no farmlands or vacant lands that are mapped as Prime Farmlands, Unique Farmlands, Farmlands of Statewide Importance, or Farmlands of Local Importance within the Project site. Adjacent to the Project site, along I-40, consists of sparsely scattered Mojave Desert Scrub habitat with intermittent barren land, rocky substrate, and sporadic tamarisk trees. All Project related work would be within the Caltrans right of way and would not be in areas designated as Farmland of Local Importance.

**Response to Item b): No Impact.** The Project would not conflict with agricultural use zoning. There are no areas within the Project area under a Williamson Act contract.

**Response to Item c): No Impact.** There are no timberland production areas adjacent to or within the Project site. The proposed Project is not expected to conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

**Response to Item d): No Impact.** The proposed Project is not expected to result in the loss or conversion of forest lands.

**Response to Item e): No Impact.** The proposed Project is not expected to involve changes that could result in the conversion of farmland to non-agricultural use or forest land to non-forest use.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization, and/or mitigation measures are not required for Agriculture and Forestry Resources.

## 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:

| Question | CEQA Determination |
|---|---|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | No Impact |
| 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? | No Impact |
| c) Expose sensitive receptors to substantial pollutant concentrations? | No Impact |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | No Impact |

**Response to Item a) b), and c): No Impact.** An Air Quality Review Memorandum was prepared on June 18, 2025 for the Project. The scope of the Project was evaluated and determined to be exempt under exempt safety project type of “Shoulder Improvements”, “Highway Safety Improvement Program Implementation”, “Guardrails, Median Barriers, Crash Cushions”, and “Pavement Resurfacing and/or Rehabilitation” as listed under Table 1 “Projects Exempt from All Emissions Analysis” of Caltrans Carbon Monoxide Protocol and Table 2 “Projects Exempt from Regional Emissions Analysis” of 40 Code of Federal Regulation (CFR) §93.126. As such, no air quality report was required. Caltrans 2024 Standard Specifications (or most recent) requires all projects to comply with applicable air pollution control rules, regulations, ordinances, and statutes. Due to its scope, the Project would not conflict with or obstruct implementation of the applicable air quality plan.

The Project does not propose any capacity increases or operational changes to the existing I-40 roadway. Emissions would temporarily increase during the construction phase, however, the Caltrans 2024 Standard Specification (or most recent) would be implemented to avoid and minimize any potential impacts to ambient air quality and

criteria pollutants. The Project is not anticipated to result in cumulatively considerable net increase of any criteria pollutants for which the region is non-attainment under applicable federal or state ambient air quality standards.

The Project is located in areas consisting of mostly undeveloped open space in a desert region of San Bernardino County. During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by construction-related activities. Emissions from construction equipment are also expected and include CO, sulfur dioxide ($SO_2$), nitrogen oxides ($NO_X$), volatile organic compounds (VOCs), directly emitted $PM_{10}$, $PM_{2.5}$, and toxic air contaminants, such as diesel exhaust particulate matter. However, these emissions would be temporary, lasting only during the duration of construction, and limited to the immediate area of the construction site. The Project is not anticipated to expose sensitive receptors to substantial pollutant concentrations.

**Response to Item d): No Impact.** Some phases of construction, particularly asphalt paving, is expected to result in short-term odors in the immediate area of each paving site. Such odors are anticipated to be quickly dispersed below detectable thresholds as distance from the site increases. Project operation is not expected to create objectionable odors.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization, and/or mitigation measures are not required for Air Quality.

## IV. Biological Resources

Would the project:

| Question | CEQA Determination |
|---|---|
| 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 Wildlife, U.S. Fish and Wildlife Service, or NOAA Fisheries? | Less Than Significant with Mitigation Incorporated |
| 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 Wildlife or U.S. Fish and Wildlife Service? | No Impact |
| 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? | Less Than Significant Impact |

| Question | CEQA Determination |
|---|---|
| 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? | No Impact |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | 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 information from this section is based on the Natural Environment Study (Condensed Format) (NESCF)[1] prepared for the Project. The biological study area (BSA) comprised of a 500-foot buffer from the limits of the project impact area (PIA). The BSA consists of sparsely scattered Mojave Desert Scrub habitat with intermittent barren land, rocky substrate, and sporadic tamarisk trees. Literature reviews were conducted to identify special status biological resources known within the Project vicinity. Field reviews and a pedestrian survey were conducted to assess general habitat conditions. A jurisdictional delineation was also conducted by Caltrans Biological Staff and accompanied by California Department of Fish and Wildlife (CDFW) representatives at the Gas Line Wash bridges and culvert locations within the Project scope of work.

**Response to Item a): Less Than Significant with Mitigation Incorporated.**

**Special-Status Plant Species**

Based on literature reviews, site characteristics, and the biological survey conducted for the Project, it was determined that numerous Federal or State-listed plant species have the potential to occur within the biological study area (BSA). A discussion of the species with habitat present within the BSA are provided below.

Small-flowered androstephium (*Androstephium breviflorum*): A perennial herb native to California, with a blooming period that extends from March through April. The Project is within the Mojave Desert, which includes the distribution range of the small-flowered androstephium. Due to its relative scarcity, there remains a low potential for this species to occur within the Mojave Desert.

[1] California Department of Transportation, Natural Environment Study (Condensed Format). September 2025.

Emory's crucifixion-thorn (*Castela emoryi*): A shrub species native to the Mojave Desert and Sonoran Deserts of North America and also found in Arizona and Mexico, with a blooming period that extends from June through July. The Project is within the Mojave Desert, which includes the distribution range of this species. Due to its relative scarcity, there remains a low potential for this species to occur within the Mojave Desert.

Purple-nerve cymopterus (*Cymopterus multinervatus*): A flowering plant in the carrot family, it is a perennial herb native to the southwestern United States, including desert regions. It occurs within Mojavean desert scrub, and Pinyon and Juniper woodlands, in elevations ranging from 2,590 to 5,905 feet. The Project is within the distribution range of this species, however, has a low potential to occur due to its relative scarcity.

Darlington's blazing star (*Mentzelia puberula*): Found within the Sonoran Desert, and especially in arid regions including sand dunes, with a blooming period that extends from February to October. The Project is within the distribution range of this species, however, has a low potential to occur due to its relative scarcity.

Creamy blazing star (*Metzelia tridentata*): An annual herb that is found only in California. It occurs within Mojavean desert scrub, growing at elevations from 2,290 to 3,850 feet with a blooming period that extends from March through May. The Project is within the distribution range from the species, and Mojavean desert scrub occurs within the Project limits. However, previous database records indicate approximately 32 sighting of this species in the previous 20 years. As such, the potential of its occurrence in the Project limits is anticipated to be very low.

White-margined beardtongue (*Penstemon albomarginatus*): This species is native to the deserts of southern Nevada and western Arizona, as well as in two desert washes in the Mojave Desert in California. As the Project is within the Mojave Desert, it is within the distribution range of this species. However, due to its relative scarcity, the species is not anticipated to occur within the Project limits.

Based on pedestrian site surveys conducted for the Project, no special-status plants were observed. Gas Line Wash is relatively void of vegetation. Some tamarisk and Mojavean desert scrub occurs on the southerly portion of Gas Line Wash at I-40, however, the majority of the Project limits are void of vegetation. Due to this lack of vegetation and with the majority of the work occurring on the paved roadway surface, there are no anticipated impacts to rare plants. Minimal vegetation removal is required at Gas Line Wash and at culvert locations. To ensure the Project does not result in take of special-status plants, the Project will implement avoidance and minimization measures (**BIO-General-1, BIO-General-2, BIO-General-3, BIO-General-7**, and **BIO-Plant-1**) and Standard Best Management Practices. No take of rare plant species, and no impacts to rare-insect obligate host plant species, including milkweed varieties is anticipated.

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**Special-Status Animal Species.**

According to the NESCF prepared for the Project, several special status animal species were determined to have appropriate habitat within the BSA and are discussed further below.

*Special Status Insect Species*

Monarch butterfly (*Danaus plexippus*): This species requires milkweed as a host plant to lay their eggs with larvae feeding on milkweed. Literature reviews identifies this species as potentially occurring within the Project limits. However, the Project area consists of previously disturbed areas within marginalized Mojave desert scrub habitat. Based on pedestrian field surveys, natural plant communities, including obligate milkweed host plants were not present within the BSA or PIA. Monarch butterflies were also not observed. Although, the Project would not impact monarch butterfly, its larva, or its host plant, there remains potential for desert milkweed species to occur within the Project limits. Therefore, to ensure avoidance of this species, avoidance and minimization measures (**BIO-General-1, BIO-General-2**, and **BIO-General-3**) are included.

*Special-Status Bird Species*

Tricolored blackbird (*Agelaius tricolor*): This species is a State-threatened Species of Special Concern. Historically associated with Central Valley wetlands but now nest in agricultural fields, particularly those near dairies. With a primary range in California, they can sometimes be found in other arid regions such as the Mojave Desert, especially within their traditional wetland habitats in decline. Although intermittent wetlands may occur throughout the desert landscape, the Project limits are predominantly arid, and do not commonly provide suitable wetland habitat capable of sustaining this species for breeding or foraging. As such, this species is not anticipated to occur within the Project limits.

Golden eagle (*Aquila chrysaetos*): In California, this species is designated as a fully protected species. Golden eagle is also protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act. Golden eagles inhabit a variety of habitats including forests, canyons, shrub lands, grasslands, and oak woodlands. The Project limits are comprised of paved roadway, highway shoulders and medians with intermittent culvert work and work within ephemeral washes. These areas do not provide suitable nesting or foraging habitat capable of supporting this species. As such, there is very low potential for this species to occur during construction, and the Project does not anticipated occurrence or *Take* of Golden eagle.

Prairie falcon (*Falco mexicanus*): This species inhabits arid and open habitats, nesting on cliff ledges overlooking open country where they hunt a diet of small mammals,

particularly ground squirrel, as well as birds and reptiles. This species is protected under the California (CA) Watchlist. The Project site provides potential foraging habitat due to the vast open expanses. However, the Project limits generally lack rocky cliffs and outcropping suitable for nesting. While there remains low potential for this species to occur on site, the Project would result in No Take of CA Watchlist protected prairie falcon.

Le Conte's thrasher (*Toxostoma lecontei*): These songbirds are found in arid, sparsely vegetated desert areas of southern California, particularly in the San Joaquin Valley, Cuyama Valley, and Carrizo Plain. They are secretive, ground-dwelling birds that use dense, thorny shrubs for nesting and concealment and are found year-round in their desert range. Although this species has occurred near the Project limits, only a single occurrence of this species was recorded in 1917. Therefore, although signs of habitat are potentially present, no suitable habitat occurs within the Project limits and based on the lack of historical occurrences, this species is not anticipated to occur within the Project limits.

The Project will require limited, incidental vegetation removal and may thus impact potential nesting habitat within a minimal confined area. However, the majority of Project construction activity occurs along the existing linear interstate alignment, consisting of mill and overlay along the I-40 mainline. Therefore, except for relatively minimal areas featuring suitable nesting vegetation and cover, most work would not impact potential nesting habitat. The Project will implement Standard Best Management Practices, along with avoidance and minimization measures (**BIO-General-1, BIO-General-2, BIO-General-3, BIO-General-5,** and **BIO-General-7**) to avoid impacts to nesting birds and avian species.

*Special-Status Reptile Species*

Desert tortoise (*Gopherus agassizii*): This species lives in a variety of habitats from sandy flats to rocky foothills, including alluvial fans, washes and canyons where suitable soils for den construction may be found. Desert tortoises are usually found in the Mojave and Sonoran deserts, specifically in southeastern California. The US Fish and Wildlife Service (USFWS) identifies the Desert Tortoise Critical Habitat along I-40, near PM 15.0-16.3, and approximately ½ to 1 mile south of the BSA. The BSA and PIA are within the Mojave Desert along sandy and rocky flats. Suitable desert tortoise habitat is present in the BSA.

Mojave fringe-toed lizard (*Uma Scoparia*): This species inhabits sparsely vegetated, windblown sand dunes and flats in the Mojave Desert. This species is specifically adapted to fine, loose sand, often near creosote bush or scrubby vegetation. Although within the Mojave Desert, the Project consists of the paved portion of I-40, Gas Line Wash, and select culverts. The PIA and BSA do not feature suitable fine, loose, sandy

soils or windblown sand dunes preferred by this species. Furthermore, the PIA is predominantly absent of vegetation.

The Project scope includes installation of permanent desert tortoise exclusionary fencing along I-40 and at culverts and washes for the length of the Project. The installation of desert tortoise exclusionary fencing will be conducted as a first order of business, precluding the desert tortoise from entering the work site. The Project will also install the permanent desert tortoise exclusion fencing along the shoulders and the perimeter of Gas Line Wash to encourage wildlife movement within the ephemeral channel and prevent wildlife from accessing I-40.

To avoid impacts to reptile species including Mohave fringe-toed lizard and desert tortoise, the Project will implement avoidance and minimization measures (**BIO-General-1, BIO-General-3, BIO-General-4, BIO-General-6, BIO-General-7, BIO-General-9, BIO-Reptile-1, BIO-PSM-1**) and include pre-construction clearance surveys and a full-time biological monitor during construction. With these measures in place, along with BMPs during construction, it is unlikely that desert tortoises will be crushed, buried, or killed by construction equipment. Direct effects are not anticipated, and indirect effects will be addressed with the avoidance and minimization measures.

The Project is not within federal designated desert tortoise critical habitat and would result in no temporary or permanent modification of federally designed critical habitat.

Only temporary impacts would result from the proposed culvert and RSP work to suitable habitat and critical habitat for desert tortoise, stemming from construction and construction personnel access. The proposed RSP work would be in-kind and would occupy the same areas as the existing RSP. The culverts would be replaced or repaired in-kind and would not result in additional permanent impacts. As such, the RSP and culvert work would not result in permanent impacts to suitable habitat or critical habitat for desert tortoise. All other Project-related work would occur on paved areas and guardrail locations. Furthermore, no new or additional lighting is proposed in connection with this Project.

As the Project is within the home range of desert tortoise, Caltrans seeks authorization of the Project from USFWS under the Desert Tortoise Programmatic Biological Opinion (DTPBO). Based on utilization of the DTPBO, pursuant to the Section 7(a)(2) of the Federal Endangered Species Act, Caltrans determined that *Project May Affect, and is Likely to Adversely Affect Desert Tortoise*. Caltrans will consult with USFWS pursuant to compliance with the DTPBO.

Due to the lack of suitable habitat within the Project impact area, Caltrans anticipates no impacts to Mohave fringe-toed lizard.

Caltrans anticipates the following temporary and permanent impacts within the desert tortoise habitat:

**Table 2-1. Desert Tortoise Habitat Impact Summary**

| Habitat Type | Temporary Impacts (acres) | Permanent Impacts (acres) |
|---|---|---|
| Critical Habitat | 0.938 | 0.012 |
| Suitable Habitat | 19.771 | 0.865 |

The above listed habitat impacts account for permanent desert tortoise fence installation across the length of the Project, RSP replacement at Gas Line Wash, and temporary construction related impacts.

Caltrans proposes mitigation (**BIO-Desert Tortoise Mitigation)** for temporary and permanent impacts within desert tortoise critical habitat. Additionally, Caltrans proposes to mitigate for temporary and permanent impacts within suitable desert tortoise habitat.

*Special-Status Mammal Species*

Desert bighorn sheep (*Ovis canadensis nelsoni*): The home range of the desert bighorn sheep is within the Mojave Desert. Suitable hills and rocky outcroppings occur within mountainous and hilly topography to the north and south of the I-40 corridor. The general Project region may serve as potential foraging or migration habitat. However, due to the existing I-40 and vehicular traffic associated with I-40, there is low potential for this species to occur within the Project limits. In addition, construction from the Project in any given area along I-40 would be short-term as work proceeds along I-40. There is limited opportunity and relatively low potential for desert bighorn sheep to occur within the Project limits during construction. *No Effect* and *No Take* of this federally and State-protected species is anticipated. Implementation of avoidance and minimization measures (**BIO-General-1, BIO-General-2, BIO-General-3, BIO-General-7**) would ensure the Project would avoid impacts to desert bighorn sheep.

**Response to Item b): No Impact.** Based on the NESCF prepared for the Project, literature reviews identified no Natural Communities of Special Concern within the Project limits. Vegetation throughout the Project site consists of sparsely scattered, creosote and alkaline scrub with surrounding Mojave Desert habitat. The proposed Project work would occur on existing paved roadways, ramps, and surrounding natural areas. There will be minor ground disturbance and the removal of ruderal, non-native ground cover. Off-highway work will occur at culverts and at Gas Line Wash, however, no natural habitat or vegetation communities overlap these locations. The Project would not impact natural communities of special concern. Implementation of avoidance and minimization measure **BIO-General-1** and Caltrans Standard Best Management Practices (BMPs), the BMPs in the anticipated Water Pollution Control Plan (WPCP),

and the 2024 Standard Specifications (or latest version) will be implemented to minimize effects during construction.

**Response to Item c): Less Than Significant Impact.** Based on the NESCF prepared for the Project, there are several jurisdictional water features within and near the BSA. Construction would occur within Waters of the State and/or Waters of the US, including ephemeral washes, wetlands, or lake beds. Additionally, the Project would install permanent desert tortoise exclusionary fencing along shoulders and the perimeter of Gas Line Wash to encourage wildlife movement within the ephemeral channel. The Project would also remove and replace RSP within Gas Line Wash Channel, therefore, Caltrans anticipates temporary and permanent impacts to the Waters of the State or Waters of the US, which are subject to regulatory permit requirements of the California Fish and Game Code, and Sections 401 and 404 of the U.S. Clean Water Act and/or CA Porter-Cologne Water Quality Act. The Project would impact jurisdictional water features and would require permits/authorization from CDFW, U.S. Army Corps of Engineers (USACE), or the State Regional Water Quality Control Board (RWQCB). Furthermore, Caltrans anticipates impacts to Waters of the State and Waters of the US with the proposed work at Gas Line Wash and culvert locations. Caltrans will determine the area of temporary and permanent impacts based on final Project design and determined during the Project design phase.

**Response to Item d): No Impact.** Transportation facilities, particularly freeways and roadways, pose an inherent barrier to wildlife and habitat connectivity. The construction of the Project would occur within washes and culverts, which provide suitable wildlife corridors or wildlife habitat connectivity. However, the Project includes the installation of permanent desert tortoise exclusionary fencing along shoulders, at culverts, and the perimeter of Gas Line Wash for the length of the Project to encourage wildlife movement within the ephemeral channel, and prevent wildlife from accessing I-40. As such, the Project will have no impacts on habitat connectivity in the Project area and surrounding area. The Project would not interfere substantially with the movement of native or migratory fish or wildlife species.

**Response to Item e): No Impact.** The proposed Project is not expected to conflict with any local policies, including the San Bernardino County General Plan or ordinances protecting biological resources.

**Response to Item f): No Impact.** The Project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. As such, no impacts are anticipated in this regard.

**Avoidance, Minimization, and/or Mitigation Measures**

Caltrans 2024 Standard Specifications (or most recent), Best Management Practices (BMPs) and the following avoidance and minimization measures would be implemented for Biological Resources:

**BIO-General-1**: **Equipment Staging, Storing & Borrow Sites.** All Staging, storing, and borrow sites require the approval of the Caltrans biologist.

**BIO-General-2**: **Pre-Construction Insect Host Plant Clearance Surveys**. Within three (3) days prior to construction, a Contractor-supplied biologist will conduct pre-construction clearance surveys for rare plants and rare insect host-plants for all locations with proposed vegetation removal. If rare plant individuals or rate-insect obligate host species (milkweed) are discovered within the work limits, these will be flagged for avoidance, and the Contractor-supplied biologist will notify the Resident Engineer and Caltrans Biological Stewardship unit within 24-hours.

**BIO-General-3**: **Biological Resource Compliance Monitor**. A Contractor-supplied biologist will monitor construction activities daily to ensure project compliance with biological resource protection measures and to ensure no effects and/or no take to listed or special-status plant or wildlife species including rare plants, desert tortoise, and nesting birds. If an active next or special-status wildlife is discovered, the Contractor-supplied biologist will establish an appropriate no-construction buffer and will notify the Resident Engineer and Caltrans Biological Stewardship unit of the discovery within 24-hours.

**BIO-General-4:** **Preconstruction Surveys.** Preconstruction desert tortoise surveys must be conducted by a Caltrans approved biologist 3 days prior to project activities within the BSA. If a desert tortoise is located, the Resident Engineer and Caltrans biologist must be contacted, and additional measures and/or agency coordination may be required.

**BIO-General-5**: **Pre-Construction Nesting Bird Clearance Survey.** Preconstruction nesting bird clearance surveys must be conducted by a Caltrans approved biologist 3 days prior to project activities within the BSA. If an active nest is located, the Caltrans biologist and Resident Engineer will establish a no-construction avoidance buffer. The Caltrans biologist will monitor the nest until the young have fledged or the nest is no longer active.

**BIO-General-6:** **Species Avoidance.** If during project activities a desert tortoise is discovered within the project site, all construction activities must stop within 50 feet and the Caltrans biologist and Resident Engineer must

be notified. Coordination with resource agencies may be required prior to restarting activities.

**BIO-General-7**: **Worker Environmental Awareness Program (WEAP).** A Caltrans approved biologist must present a biological resource information program/WEAP for special status plants, nesting birds, special status wildlife including desert tortoise and desert bighorn sheep prior to project activities to all personnel that will be present within the project limits for longer than 30 minutes at any given time.

**BIO-General-9**: **Trash Prevention.** Caltrans will implement measures to reduce the attractiveness of work sites to common ravens (Corvus corax) and other subsidized predators by controlling trash and educating workers.

**BIO-Reptile-1**: **Equipment Flagging**. After each shift, order project personnel to attach surveyor flagging tape to a conspicuous place on each piece of equipment to remind the operator to check under the equipment for desert tortoises before operating equipment during the next shift.

**BIO-PSM-1**: Caltrans will contribute funds toward the Raven Fund.

The following compensatory mitigation measure will be implemented for temporary and permanent impacts to desert tortoise habitat.

**BIO-Desert Tortoise Mitigation:** Caltrans proposes to mitigate for temporary and permanent impacts within desert tortoise critical habitat. Additionally, Caltrans proposes to mitigate for temporary and permanent impacts within suitable desert tortoise habitat.

## V. Cultural Resources

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5? | No Impact |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | No Impact |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | No Impact |

A Historic Property Survey Report (HPSR)[2] was prepared for the Project and approved on September 12, 2025. The HPSR included an Area of Potential Effects (APE) map that was approved on September 11, 2025. The APE was delineated to encompass the maximum extent of direct and indirect impacts within the Project's horizontal and vertical construction footprints. The horizontal component of the APE extends to a maximum

[2] California Department of Transportation, Historic Property Survey Report. September 2025.

length of 13.8-miles by 47.0-feet wide to accommodate pavement rehabilitation. The width varies between PM R15.4 and R15.42 and fluctuates from 370-ft for RSP replacement, to 170.0-ft for staging and storage in the median, then narrows to 70.0-ft to accommodate the proposed maintenance access road associated with the RSP replacement. The maximum vertical limit of the APE is 10.0-ft above pavement for construction equipment and 0.8-ft below pavement for localized digouts. The majority of the Project will have a maximum depth of 0.5-inches below ground surface for pavement overlay. The entire length of the project is also built-up and composed of artificial fill deposits, as such, the majority of the project APE exists above the original ground surface.

The California Native American Heritage Commission (NAHC) was contacted, and a request was made for the Sacred Lands File search on June 18, 2025. The NAHC provided a response letter on July 8, 2025 with a list of Native American tribal contacts. The following Native American tribes were contacted:

- Kern Valley Indian Community: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Morongo Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Quechan Indian Tribe of the Fort Yuma Reservation: Initial letter sent on June 23, 2025 and response received on June 23, 2025 deferring to local tribes. No other responses have been received.

- San Fernando Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Serrano Nation of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Twenty-Nine Palms Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Yuhaaviatam of San Manuel Nation: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

Other background and records search efforts included the National Register of Historic Places (NRHP), California Points of Historical Interest, California Register of Historical Resources (CRHR), California Historical Resources Information System (CHRIS), National Historic Landmark (NHL), Caltrans Historic Bridge Inventory, California Historical Landmarks (CHL), Caltrans Cultural Resources Database (CCRD), and historic aerials and topographic maps.

**Response to Items a) and b): No Impact.** The HPSR prepared for the Project indicates that a total of 42 cultural resources were identified within 0.25-miles of the Project. Of these resources, one resource was identified within boundaries that appeared to overlap the Project APE: P-36-000317 (CA-SBR-317/H-Newberry Springs Site). Although the APE appeared to overlap the boundaries of this resource, the roadway through this area is composed of fill that has elevated the I-40 roadway 5.0 to 14.0-ft from the original ground surface. Therefore, the resource is outside of the vertical APE as the proposed work in this area includes pavement mill and overlay and will not exceed depths of 0.5-inches. As such, there is no potential to encounter or effect Historic Properties as there are no Historic Properties in the APE.

Furthermore, although the buried archaeological sensitivity in the region can be typically high due to unknown cultural resources, the only proposed off pavement work will take place in a drainage (Gas Line Wash) with no archaeological preservation and no previously recorded resources. In addition to the drainage work, staging and storage along within grading for the access road to Gas Line Wash will take place in the previously graded and extremely disturbed median. The work locations along with the entire I-40 roadway within the APE contain no archaeological preservation and therefore the archaeological sensitivity through the APE is considered very low. The HPSR determined that there are cultural resources within the APE that were previously determined not eligible for inclusion in the NRHP with SHPO concurrence and those determinations remain valid. Bridges listed as Category 5 (previously determined not eligible for listing in the NRHP) in the Caltrans Historic Bridge Inventory are present within the APE and those determinations remain valid. Furthermore, the HPSR determined a Finding of No Historic Properties Affected is appropriate for the undertaking as there are no historic properties within the APE.

**Response to Item c): No Impact.** The Project is not anticipated to disturb human remains and would occur on mostly on previously disturbed areas. If buried cultural materials, including human remains, are encountered during construction, it is Caltrans' policy that work stops in that area until a qualified archaeologist can evaluate the nature and significance of the find. If human remains are discovered, California Health and Safety Code Section 7050.5 will be followed. This Code, in summary, states that further disturbances and activities will stop in any area or nearby area suspected to overlie remains, and the county coroner shall be contacted under this circumstance. Pursuant to California PRC Section 5097.98, if the remains are thought to the Native American,

the coroner will notify the NAHC, who will then notify the Most Likely Descendant (MLD), as further detailed in measure **CUL-2**.

**Avoidance, Minimization, and/or Mitigation Measures**

Caltrans 2024 Standard Specifications (or most recent), Best Management Practices (BMPs), and the minimization measures below would be implemented for cultural resources:

**CUL-1:** If buried cultural resources are encountered during Project Activities, it is Caltrans policy that work stop within 60 feet of the area until a qualified archaeologist can evaluate the nature and significance of the find.

**CUL-2:** If human remains are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to CA Public Resources Code (PRC) Section5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendant (MLD). At this time, the person who discovered the remains will contact Gabrielle Duff, District Environmental Branch Chief [(909) 501-5142] or Julie Scrivner, District Native American Coordinator [(909) 260-8265] so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

## VI. Energy

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | No Impact |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | No Impact |

**Response to Items a) and b): No Impact.** The Project does not propose to increase the capacity or permanently alter the operations of the existing I-40 facility. Caltrans 2024 Standard Specifications (or most recent) will be implemented to avoid and minimize any potential wasteful, inefficient, or unnecessary consumption of energy resources during construction. There are no changes to the operations, buildings, or energy consuming land uses as a result of the Project. As such, no impacts are anticipated.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization, and/or mitigation measures are not required for Energy.

## VII. Geology and Soils

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:<br><br>i) 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. | No Impact |
| ii) Strong seismic ground shaking? | No Impact |
| iii) Seismic-related ground failure, including liquefaction? | No Impact |
| iv) Landslides? | No Impact |
| b) Result in substantial soil erosion or the loss of topsoil? | No Impact |
| 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? | No Impact |
| 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? | No Impact |
| 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? | No Impact |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | No Impact |

**Response to Items a.i) and a.ii): No Impact.** According to the California Department of Conservation, California Geological Survey's earthquake fault zone map, the nearest fault is the Calico Fault and the Calico-Hidalgo Fault Zone which bisects I-40 near the community of Newberry Springs near Newberry Road. The Pisgah Fault is also located approximately 3-miles southeast from the eastern end of the Project. The Project is expected to result in no impacts because construction and operation of the Project would have no opportunity to rupture a known earthquake fault or cause seismic shaking.

**Response to Item a.iii): No Impact.** Liquefaction occurs primarily in loose, saturated, fine-to medium-grained soils in areas where the groundwater table is within approximately 50 feet below the ground surface. Shaking causes the soils to lose strength and behave as a liquid. Based on the San Bernardino County Land Use Plan, General Plan, Geologic Hazard Overlays map, the project is not located in areas designated as having liquefaction susceptibility. Compliance with the most current Caltrans procedures regarding seismic design, which is standard practice on all Caltrans projects, would be conducted to avoid any significant impacts related to liquefaction and seismic risks. Therefore, through the incorporation of standard seismic design practices, the Project is expected to result in no impacts.

**Response to Items a.iv), c), and d): No Impact.** Based on the San Bernardino County Land Use Plan, General Plan, Geologic Hazard Overlays map, the Project is not located in an area designated as having generalized landslide susceptibility or located in areas of expansive soils. There are no areas designated as being within an Existing Landslide area and no areas within a Rockfall/Debris-Flow Hazard Area.

Soils subsidence may be caused by a variety of human and natural activities, including earthquakes and the long-term extraction of underlying groundwater, oil, or gas resources. According to the San Bernardino Countywide Plan Draft PEIR, subsidence due to groundwater extraction affects the desert regions of San Bernardino County, particularly near dry lakebeds in the Mojave and Morongo basins. However, the Project area and vicinity of Newberry Springs/Troy Lake is not identified as being in a high risk of future subsidence. As such, no impacts are anticipated in this regard.

**Response to Item b): No Impact.** Construction activities during the construction phase of the Project would have the potential to displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. The disturbed soil area is defined by Caltrans as consisting of areas of exposed, erodible soil that are within the construction limits and that result from construction-related activities. Construction site BMPs, which are standard practices for erosion and water quality control, would be used on the Project site. Temporary erosion control will be provided during construction, and permanent erosion control will be applied to all disturbed soil areas at completion of all soil disturbing activities. .

**Response to Item e): No Impact.** Due to the nature of the Project, the Project is not expected to affect existing or proposed septic tanks or alternate wastewater disposal systems, nor would the use of septic tanks be involved during construction. No impacts are anticipated.

**Response to Item f): No Impact.** As the Project is within a previously disturbed area, and the Project involves minor pavement rehabilitation and other roadway improvements within the existing Caltrans right of way, no paleontological resources

would be disturbed and no unique geological features are expected to be impacted by the Project.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization, and/or mitigation measures are not required for Geology and Soils.

## VIII. Greenhouse Gas Emissions

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | 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 |

**Response to Item a): Less Than Significant Impact.** This section is based on the Construction greenhouse gas (GHG) Emissions Estimate[3] prepared for the Project. Based on the Project scope of work, which involves minor pavement rehabilitation along I-40, construction and GHG emissions were estimated using Caltrans Construction Emissions Tool (CAL-CET). The construction activities would generate a total of 1,605.3 metric tons of CO2e over the approximate 240-day construction period. As the Project would not increase the number of travel lanes on I-40, no increase in operational GHG emissions are expected to occur. Therefore, environmental impacts resulting from Project GHG emissions are considered to be less than significant.

**Response to Item b): No Impact.** The project would not conflict with any applicable plan, policy or regulation, including the Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), San Bernardino County Regional Greenhouse Gas Reduction Plan, or the San Bernardino County, Countywide Plan adopted for the purpose of reducing greenhouse gas emissions.

**Avoidance, Minimization, and/or Mitigation Measures**

Caltrans 2024 Standard Specification (or most recent), Best Management Practices (BMPs), and the measures below would be implemented to minimize construction GHG emissions.

[3] California Department of Transportation, Construction GHG Emissions Estimate. May 1, 2025.

**GHG-1** The contractor must comply with Standard Specification 7-1.02C (Emissions Reduction) which requires that the contractor certify awareness of CARB emissions reduction regulations and will comply with them.

**GHG-2** The Project will maintain equipment in proper tune and working condition.

## IX. Hazards and Hazardous Materials

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | No Impact |
| 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? | No Impact |
| 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 |
| 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 |
| 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 |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | Less Than Significant Impact |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | No Impact |

**Response to Items a) and b): No Impact.** The Project proposes minor pavement rehabilitation on I-40 and would not necessitate or increase any existing routine transport, use, or disposal of hazardous materials. The Project does not propose to store hazardous materials or change the operation of the existing I-40 facility. An Initial Site Assessment (ISA) Checklist and Update was prepared for the Project and determined that due to the existing pavement bulk removal by digouts or cold planning, no lead based paint testing is required for striping or pavement markings. An asbestos investigation for all bridges will be scheduled after the Project Approval and

Environmental Document (PA&ED) phase as asbestos containing materials is considered a low risk category for this Project. A Traffic Management Plan (TMP) will be developed and refined through the Design phase, and will be implemented during construction to manage the safe and efficient flow of traffic during construction. The Project is not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials.

**Response to Item c): No Impact.** There are no schools located within one-quarter mile of the Project area.

**Response to Item d): No Impact.** A GeoTracker and EnviroStor database search was conducted in support of the ISA Checklist and Update prepared for the Project and determined that the Project would not be located on a site which is included on a list of hazardous material sites.

**Response to Items e): No Impact.** The Project is located approximately 2.4-miles from the Barstow-Daggett Airport. Based on the San Bernardino County Planning Department, Airport Comprehensive Land Use Plan for the Barstow-Daggett Airport, the Project is located outside of the plan boundary and safety review areas of the Barstow-Daggett Airport. The Project does not include any features that would interfere with any air traffic flight paths or other airport activities.

**Response to Item f): Less Than Significant Impact**. The Project involves minor pavement rehabilitation, and as such, the Project is not expected to interfere with emergency response or evacuation plans, including the San Bernardino County, Office of Emergency Services, Emergency Operation Plan or Hazard Mitigation Plan. During the construction phase, emergency response times could increase temporarily due to increased traffic congestion caused by construction, speed reductions, and the presence of construction personnel and equipment. During construction, a Traffic Management Plan (TMP), as included in measure **TRA-1**, would be implemented to minimize these delays and help to ensure continued emergency access to the Project area.

**Response to Item g): No Impact.** Based on the CAL FIRE Fire Hazard Severity Zones Map for San Bernardino County, portions of the Project site are located in areas designated as Moderate for Fire Hazard Severity Zones in Local Responsibility Area (LRA) and in areas designated as within the Federal Responsibility Area (FRA). The Project involves minor pavement rehabilitation to preserve, repair and extend the life of the existing pavement and to improve ride quality. The Project will also bring four culverts and RSP to a state of good condition and to restore and extend their service life. As such, the Project is not expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

**Avoidance, Minimization, and/or Mitigation Measures**

The following minimization measures would also be implemented for Hazards and Hazardous Materials:

**HAZ-1:** Project will be performed in accordance with Caltrans Standard Specification 6-1.03 “Local Material”.

**HAZ-2:** Project will be performed in accordance with Caltrans Standard Specifications Section 14-11.14 for treated wood waste.

**HAZ-3**: Project will be performed in accordance with Caltrans Standard Specifications Section 14-9.02 “Air Pollution Control” [National Emission Standards for Hazardous Air Pollutants (NESHAP) notification for air pollution control during bridge demolition or rehabilitation].

**HAZ-4**: Project will be performed in accordance with Caltrans Standard Specifications Section 36-4 “Residue Containing Lead from Paint and Thermoplastic.”

**HAZ-5:** Project will be performed in accordance with Caltrans Standard Specifications Section 84-9.03B “Remove Traffic Stripes and Pavement Markings Containing Lead”.

**HAZ-6:** ADL testing is currently in progress and is expected to be completed by January 2026. In the event that the survey reveals the presence of ADL, all recommendations will be followed.

## X. Hydrology and Water Quality

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | No Impact |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin? | No Impact |
| 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:<br><br>(i) result in substantial erosion or siltation on- or off-site; | No Impact |
| (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | No Impact |

| Question | CEQA Determination |
|---|---|
| (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 | No Impact |
| (iv) impede or redirect flood flows? | No Impact |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | No Impact |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | No Impact |

**Response to Item a): No Impact.** A Scoping Questionnaire for Water Quality Issues[4] was prepared to determine the Project's water quality impacts. Short-term or temporary construction impacts on water quality have the potential to occur during ground disturbance activities. Because the Project would be constructed entirely within existing State ROW, the California Statewide Order No. 2022-0033-DWQ, NPDES Permit No. CAS000003 would apply to this Project. Temporary impacts are anticipated to be minimized with the implementation of construction Best Management Practices (BMPs) to minimize construction runoff and protect water quality.

Compliance with the NPDES requirements would further reduce such polluting impacts during construction. Projects within State ROW are obligated to comply with the latest Caltrans and RWQCB water quality standards relative to the treatment of post-construction stormwater runoff. Determination and implementation of BMPs within the ROW are defined based on the evaluation of existing site constraints, constituents of concern at the receiving waters, soil conditions, and hydraulic conditions. Prior to approval of the final design of the Project, applicable post-construction BMPs would be identified to ensure that applicable Caltrans selection and siting criteria have been achieved. The BMPs would reduce long-term water quality impacts due to implementation of the Project. Therefore, water quality impacts are not anticipated.

**Response to Item b): No Impact.** The Project would implement minor pavement rehabilitation to preserve, repair, and extend the life of the existing pavement and improve ride quality. The Project would also bring the four culverts and RSP to a state of good condition, restore, and extend their service life. Ground disturbance is anticipated to be shallow and will not exceed depths of 0.5-inches for pavement overlay and as such, groundwater is not anticipated to be affected by the Project.

**Response to Items c (i), (ii), (iii), and (iv): No Impact.** The Project would not alter existing drainage patterns. The proposed RSP replacement would be in-kind and would occupy the same area as the existing RSP. The culverts would also be replaced or

[4] California Department of Transportation, Scoping Questionnaire for Water Quality Issues. October 2025.

repaired in-kind and would not result in changes to existing drainage patterns. Erosion control and stormwater BMPs will be incorporated as part of the Project to reduce storm water impacts. Furthermore, BMPs would be designed and implemented to reduce the discharge of pollutants from the Caltrans storm drain system to the maximum extent practicable. Erosion control measures would also be used to address site soil stabilization and reduce deposition of sediments into adjacent surface waters. Temporary water pollution control and permanent erosion control plans will be prepared during the plans, specifications, and estimate design phase of the Project. No impacts are expected to occur with regards to runoff, drainage patterns, and water quality.

**Response to Item d): No Impact.** Based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map Number 06071C4557H), the project is located in an area designated as Zone D (areas in which flood hazards are undetermined, but possible). Based on the Location Hydraulic Study (LHS)/Floodplain Evaluation Report Summary (SFER)[5] prepared for the Project, the Project is not within a defined FEMA floodplain and there is no potential that construction could impact any FEMA floodplain. As such, no impacts are anticipated.

**Response to Item e): No Impact.** The Project would not conflict with or obstruct implementation of the Water Quality Control Plan for the Lahontan Region. There are no municipal or domestic water supply reservoirs or recharge facilities within the project limits. The proposed improvements to I-40 would not result in impacts to groundwater as ground disturbance would not reach depths of groundwater. Therefore, no impacts are anticipated.

### Avoidance, Minimization, and/or Mitigation Measures

Avoidance, minimization, and/or mitigation measure are not required for Hydrology and Water Quality.

## XI. Land Use and Planning

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Physically divide an established community? | No Impact |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | No Impact |

**Response to Item a): No Impact.** The Project would be fully within existing Caltrans right of way. As I-40 is an existing roadway, no physical division is anticipated to be

[5] California Department of Transportation, Location Hydraulic Study (LHS)/Floodplain Evaluation Report Summary (SFER). June 2025.

created. Roadways are considered an integral part of development and land use patterns because they are required to facilitate travel and connectivity between areas. Implementation of the Project is not expected to diminish access to adjacent areas, nor would it physically divide an established community. No impacts on existing established communities are anticipated.

**Response to Item b): No Impact.** The surrounding land uses consists of mostly rural open space within the surroundings of the Mojave Desert. After completion of the project, the operation and use would remain the same, therefore, it would not conflict with any land use plan. Furthermore, the project would improve conditions on an existing roadway, which is consistent with the San Bernardino County goals (Goal TM-5) and policies (Policy TM-2.2) to maintain safe and efficient mobility of people and goods throughout the region.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization and/or mitigation measures are not required for Land Use and Planning.

## XII. Mineral Resources

Would the project:

| Question | CEQA Determination |
|---|---|
| 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 |
| 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? | No Impact |

**Response to Items a), and b): No Impact.** Based on the San Bernardino Countywide Plan, Figure 5.11-1 Mineral Resource Zones (MRZ) 2 & 3 in the Southwest Quadrant of County map, there are no designated mineral zones ( MRZ-2 or MRZ-3) within the Project site. The Project is entirely located within the Caltrans right of way, along a developed highway, and would not result in the loss of a known mineral resource. No impacts are anticipated to mineral resources.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization and/or mitigation measures are not required for Mineral Resources.

## XIII. Noise

Would the project result in:

| Question | CEQA Determination |
|---|---|
| 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 |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | 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 levels? | No Impact |

**Response to Item a): No Impact.** Based on the Noise and Air Quality Review Memorandum[6] the Project falls under Type III project category of 23 CFR772.7, as a project not requiring a noise analysis. Furthermore, construction would occur within the Caltrans right of way, which currently experiences noise levels consistent with an active highway.No impacts are anticipated.

**Response to Item b): No Impact.** Any groundborne noise or vibration would be limited to the construction period, limited to a specific location and not along the entire Project route at once, and would be short term in duration. Construction would occur in an area that experiences noise levels consistent with an active highway. As such, impacts related to the generation of excessive groundborne vibration or groundborne noise are not anticipated.

**Response to Item c): No Impact.** The Barstow-Daggett Airport is located approximately 2.4-miles to the northwest of the Project site. No habitable structures are proposed as part of the Project. The Project is not expected to expose people residing or working in the Project area to excessive noise levels, therefore, no impacts are anticipated to occur.

### Avoidance, Minimization, and/or Mitigation Measures

Avoidance, minimization and/or mitigation measures are not required for Noise.

[6] California Department of Transportation, Noise and Air Quality Review Memorandum. June 18, 2025.

## XIV. Population and Housing

Would the project:

| Question | CEQA Determination |
|---|---|
| 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)? | No Impact |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | No Impact |

**Response to Item a): No Impact.** The Project proposes minor pavement rehabilitation on an existing roadway that is in need of repair. These improvements would not result in any construction of new homes or businesses, nor would the Project result in the need for roads or other infrastructure that would facilitate an increase in population. No impacts are anticipated in this regard.

**Response to Item b): No Impact.** The Project is not anticipated to require any additional permanent right of way. Furthermore, no residents or businesses would need to be relocated as a result of implementing the Project. The Project does not necessitate the relocation of any existing developments and/or people. All Project-related work would be conducted within the Caltrans right of way. No impacts are anticipated in this regard.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization and/or mitigation measures are not required for Population and Housing.

## XV. Public Services

Would the project 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 following public services:

| Question | CEQA Determination |
|---|---|
| a) Fire protection? | No Impact |
| b) Police protection? | No Impact |
| c) Schools? | No Impact |
| d) Parks? | No Impact |
| e) Other public facilities? | No Impact |

### Fire Protection

**Response to Fire Protection: No Impact.** The County of San Bernardino Fire Department, Division 5 provides fire protection in the Project vicinity. The following is the fire station in the Project vicinity:

- Harvard Station #52, located at 39059 Kathy Lane, Newberry Springs, 92365.

Although continuous, uninterrupted access to I-40 throughout the duration of construction is expected, construction activities have the potential to result in temporary, localized, site-specific disruptions in the area of construction. This could lead to an increase in delay times for emergency response vehicles during construction. This construction-related congestion and delay would be addressed in the Traffic Management Plan (TMP) (**TRA-1**; refer to Section XVII Transportation) that is prepared in coordination with a public information program prior to construction.

The Project is not expected to result in an increase in population, and therefore would not increase demand for community services. No fire stations are anticipated to be acquired or displaced; therefore, there would be no effect on the delivery of fire services. The Project is not expected to induce growth or increase population in the study area or the greater community beyond that which has been previously planned for and would not result in the need for additional fire protection. No impacts are anticipated to fire protection services.

### Police Protection

**Response to Police Protection: No Impact.** The San Bernardino County Sheriff's Department, Barstow Station (located at 225 East Mt. View Street, Barstow, 92311) provides police services in the Project area as well as the California Highway Patrol (Substation located at 300 East Mt. View Street, Barstow, 92311). As mentioned previously, construction related congestion could affect the response times for police service providers; however, continuous, uninterrupted access to I-40 would be provided throughout the duration of construction. In addition, implementation of a construction-period TMP would ensure that access is maintained to and from the Project area and that the police service providers are notified prior to the start of construction activities. No impacts are anticipated in this regard.

### Schools

**Response to Schools: No Impact.** There are no schools located within the vicinity of the Project site. The Project would not be expected to result in any impacts on school services.

### Parks

**Response to Parks: No Impact.** The Newberry Mountains Wilderness area, managed by the U.S. Department of the Interior, Bureau of Land Management, is located to the south of I-40 along the Project area. As mentioned previously, the Project is not expected to induce population growth in the area beyond that which has been previously planned for and would not result in the need for additional parks or recreational facilities. Additionally, the Project is expected to be constructed within existing Caltrans right of way, with no impacts to parks.

### Other Public Facilities

**Response to Other Public Facilities: No Impact.** There are no other public facilities that would be affected by the Project.

### Avoidance, Minimization, and/or Mitigation Measures

Avoidance, minimization, and/or mitigation measures are not required for Public Services.

## XVI. Recreation

| Question | CEQA Determination |
|---|---|
| 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 |
| 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? | No Impact |

**Response to Items a) and b): No Impact.** The Project involves minor pavement rehabilitation to preserve, repair and extend the life of the existing pavement and to improve ride quality along I-40. The Project would also improve four culverts and RSP for two bridges at Gas Line Wash to a state of good condition, restore, and extend the service life. All work is expected to be performed within Caltrans right of way. As such, implementation of the Project does not have the capacity to generate a substantial increase in the use of any existing neighborhood or regional parks, or other recreational facilities such that substantial physical deterioration could occur, nor would it require the construction or expansion of existing recreational facilities.

### Avoidance, Minimization, and/or Mitigation Measures

Avoidance, minimization and/or mitigation measures are not required for Recreation.

## XVII. Transportation

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | No Impact |
| b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | No 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 |
| d) Result in inadequate emergency access? | No Impact |

**Response to Item a) No Impact.** The Project would preserve, repair, and extend the life of the existing pavement along I-40 and improve ride quality. The Project would also improve culverts and RSP for two bridges at Gas Line Wash to a state of good condition, restore, and extend the service life. As such, the Project would not conflict with the San Bernardino County Policy Plan, Transportation & Mobility Element. The Project would preserve, repair, and extend the life of the existing pavement and improve ride quality, for these reason no impacts are anticipated.

**Response to Item b): No Impact.** As mentioned, the Project does not involve any capacity increasing elements and therefore, the Project is unlikely to induce measurable and substantial increases in VMT and a VMT analysis is not required. As indicated in Section 15064.3 (b)(2) transportation Projects that reduce, or have no impact on vehicle miles traveled should be presumed to cause a less than significant transportation impact. As such, no impacts are anticipated in this regard.

**Response to Item c): No Impact.** The Project would not substantially increase hazards because of a design feature or incompatible uses. The Project would maintain the existing lane configuration and layout of the existing I-40 facility. Therefore, no impacts are anticipated in this regard.

**Response to Item d): No Impact.** Construction activities have the potential to result in temporary, localized, and site-specific disruptions during the construction period. This could lead to an increase in delay times for emergency response vehicles during construction; however, the Project would include the Caltrans Standard Measure for preparation and implementation of a TMP (measure **TRA-1,** below), which would avoid or minimize any potential impacts. The Project is expected to also provide continuous, and uninterrupted access to I-40 throughout the duration of construction. No impacts are anticipated during the construction period.

**Avoidance, Minimization, and/or Mitigation Measures**

Caltrans 2024 Standard Specifications (or most recent), Best Management Practices (BMPs), and the measure below would be implemented to avoid, and minimize any potential impacts to Transportation:

**TRA-1**: Prior to construction, a TMP will be prepared to minimize potential impacts on emergency services and commuters during construction.

## XVIII. Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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:

| Question | CEQA Determination |
|---|---|
| a) 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 |
| b) 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. | No Impact |

**Response to Items a) and b): No Impact.** A HPSR was approved on September 12, 2025. The California Native American Heritage Commission (NAHC) was contacted, and a request was made for the Sacred Lands File search on June 18, 2025. The NAHC provided a response letter on July 8, 2025 with a list of Native American tribal contacts. The following Native American tribes were contacted:

- Kern Valley Indian Community: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Morongo Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Quechan Indian Tribe of the Fort Yuma Reservation: Initial letter sent on June 23, 2025 and response received on June 23, 2025 deferring to local tribes. No other responses have been received.

- San Fernando Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Serrano Nation of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Twenty-Nine Palms Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Yuhaaviatam of San Manuel Nation: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received

The Project is not anticipated to impact historical resources listed in the California Register of Historical Resources, in a local register of historical resources, as defined in PRC 5020.1(k), or resources determined to be significant under PRC 5024.1.

**Avoidance, Minimization, and/or Mitigation Measures**

Refer to measures **CUL-1** and **CUL-2** in Section V, *Cultural Resources*.

## XIX. Utilities and Service Systems

Would the project:

| Question | CEQA Determination |
|---|---|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | 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 |
| 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 |

| Question | CEQA Determination |
|---|---|
| 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 |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | No Impact |

**Response to Item a): No Impact.** The Project would result in minor pavement rehabilitation all within the existing Caltrans right of way. These Project improvements would not result in significant effects to existing water/wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. No utility relocations are anticipated as a result of the Project.

**Response to Item b): No Impact.** The Project would not construct any new residential or non-residential structures that would induce population or employment growth that would require a new water supply. Due to the nature and scope of the proposed minor pavement rehabilitation along I-40, no impacts are anticipated on water supplies.

**Response to Item c): No Impact.** The Project is not expected to increase the demand for wastewater treatment providers or result in inadequate capacity for wastewater treatment providers beyond their current existing commitments because the Project would not require wastewater treatment. As the Project would involve pavement rehabilitation along I-40, construction activities are not expected to increase capacity of existing wastewater treatment facilities. As such, no impacts are anticipated in this regard.

**Response to Item d): No Impact.** As the Project would preserve, repair, and extend the life of the existing pavement, the Project would generate a minimal amount of solid waste. During operation of facility, the Project would not generate solid waste. Furthermore, it is Caltrans' policy to recycle construction materials whenever possible. Opportunities to salvage and recycle items, such as metal beam guardrails would also be considered. As such, the Project is not expected to impair the attainment of the state's solid waste reductions goals.

**Response to Item e): No Impact.** The Project would require the use of a local landfill, if applicable, to dispose of construction materials. The use of local landfills is expected to occur during construction. It is Caltrans' policy to recycle materials whenever possible, and the Project is expected to comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization and/or mitigation measures are not required for Utility and Service Systems.

## XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

| Question | CEQA Determination |
|---|---|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | 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 |
| 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 |
| 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? | No Impact |

**Response to Items a): No Impact.** The Project involves minor pavement rehabilitation to I-40 to preserve, repair and extend the life of the existing pavement and to improve ride quality. As such, the Project is not expected to interfere with emergency response or evacuation plans, including the San Bernardino County, Office of Emergency Services, Emergency Operation Plan or Hazard Mitigation Plan. During construction, a TMP, as included in measure **TRA-1**, would be implemented to minimize these delays and help to ensure continued emergency access to the Project area.

**Response to Items b), c), d): No Impact.** The Project is not anticipated to exacerbate wildfire risk and, as there are no new structures proposed, the Project would not expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Based on the CAL FIRE Fire Hazard Severity Zones Map for San Bernardino County, portions of the Project site are located in areas designated as Moderate for Fire Hazard Severity Zones in Local Responsibility Area (LRA) and in areas designated as within the Federal Responsibility Area (FRA). The Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk, and would not result in temporary or ongoing impacts on the environment. Furthermore, the Project does not expect to expose people or structures to significant risks, including downslope or downstream flooding or landslides a s result of runoff, post-fire slope instability, or drainage changes.

**Avoidance, Minimization, and/or Mitigation Measures**

Avoidance, minimization and/or mitigation measures are not required for Wildfire.

## XXI. Mandatory Findings of Significance

| Question | CEQA Determination |
|---|---|
| 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? | Less Than Significant with Mitigation Incorporated |
| 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)? | No Impact |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | No Impact |

**Response to Item a): Less Than Significant with Mitigation Incorporated.** Caltrans determined that the Project "*May Affect, Likely to Adversely Affect*" the federally-listed threatened desert tortoise and its designated critical habitat and will require USFWS Section 7 Consultation utilizing the DTPBO. Federally designated critical habitat for desert tortoise occurs within the Project limits between PM 15.5 and PM 16.3, south of I-40. 0.938-acre of temporary impacts and 0.012-acre of permanent impacts to desert tortoise critical habitat are estimated. **BIO-General-1, BIO-General-3, BIO-General-4, BIO-General-6, BIO-General-7, BIO-General-9, BIO-Reptile-1, BIO-PSM-1, BIO-Desert Tortoise Mitigation** would be implemented to avoid and minimize and/or mitigate potential impacts to desert tortoise. The Project would result in *No Effect* to Monarch Butterfly or peninsular bighorn sheep.

The Project will result in *No Take* of State-listed as endangered desert tortoise. Additionally, Caltrans determined the Project will result in *No Take* of State-threatened Tri-colored blackbird, or fully-protected peninsular bighorn sheep.

Project activities will occur within jurisdictional water features or associated riparian vegetation areas. Therefore, jurisdictional permits will be required from CDFW pursuant to Section 1602 of the California Fish and Game Code, and a Report of Waste Discharge from the State RWQCB. Temporary or permanent impacts to Waters of the US are not anticipated.

The Project has the potential to spread invasive species by entering and exiting construction with contaminated equipment, the inclusion of invasive species in seed mixtures, and improper removal and disposal of invasive species seeds. The Project will implement Caltrans Standard BMPs and 2024 Standard Specifications (or latest version) to prevent the importation of invasive plant materials and further degradation of vegetation.

**Response to Item b): No Impact.** The HPSR prepared for the Project determined that a Finding of No Historic Properties Affected is appropriate for this undertaking because there are no historic resources within the APE. As such, cumulatively considerable impacts to historical resources are not anticipated.

The Project will occur on existing paved roadways, ramps, and surrounding natural areas with no natural communities of special concern within these areas. Off-highway work will occur at culverts and Gas Line Wash, however, no natural habitat or vegetation communities overlap these locations. As such, the Project is not anticipated to have significant adverse cumulative effects to natural communities.

Special-status plants and animals have experienced cumulative impacts from development, habitat degradation, human and vehicular traffic, and other factors in the Project area such as the development of I-40. The Project would occur entirely within the Caltrans right of way and mostly in areas that are developed and disturbed. The estimated acreage of impacts to desert tortoise critical habitat is low and impacts to desert tortoise will be avoided, minimized, and/or mitigated in accordance with **BIO-General-1, BIO-General-3, BIO-General-4, BIO-General-6, BIO-General-7, BIO-General-9, BIO-Reptile-1, BIO-PSM-1**.

Cumulatively considerable impacts to natural communities of concern, jurisdictional resources, and special-status plants and animals are not anticipated.

**Response to Item c): No Impact.** Operation of the Project is not expected to result in the exposure of persons to any substantially adverse natural or human-made hazards that could directly or indirectly cause substantial adverse effects on human beings, such as geologic hazards, air emissions, hazardous materials, or flooding. No impacts are anticipated.

**Avoidance, Minimization, and/or Mitigation Measures**

Caltrans 2024 Standard Specifications (or most recent), BMPs, and the following avoidance, minimization measures will be implemented to address potential project impacts: **BIO-General-1, BIO-General-3, BIO-General-4, BIO-General-6, BIO-General-7, BIO-General-9, BIO-Reptile-1, BIO-PSM-1**.

With the following mitigation measure incorporated, the Project would have less than significant effect to biological resources: **BIO-Desert Tortoise Mitigation**.

## 2.2 Climate Change

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the Earth's climate system. The Intergovernmental Panel on Climate Change, established by the United Nations and World Meteorological Organization in 1988, is devoted to greenhouse gas (GHG) emissions reduction and climate change research and policy. Climate change in the past has generally occurred gradually over millennia, or more suddenly in response to cataclysmic natural disruptions. The research of the Intergovernmental Panel on Climate Change and other scientists over recent decades, however, has unequivocally attributed an accelerated rate of climatological changes over the past 150 years to GHG emissions generated from the production and use of fossil fuels.

Human activities generate GHGs consisting primarily of carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF6), and various hydrofluorocarbons (HFCs). $CO_2$ is the most abundant GHG; while it is a naturally occurring and necessary component of Earth's atmosphere, fossil-fuel combustion is the main source of additional, human-generated $CO_2$ that is the main driver of climate change. In the U.S. and in California, transportation is the largest source of GHG emissions, mostly $CO_2$.

The impacts of climate change are already being observed in the form of sea level rise, drought, extended and severe fire seasons, and historic flooding from changing storm patterns. The most important strategy to address climate change is to reduce GHG emissions. Additional strategies are necessary to mitigate and adapt to these impacts. In the context of climate change, "mitigation" involves actions to reduce GHG emissions to lessen adverse impacts that are likely to occur. "Adaptation" is planning for and responding to impacts to reduce vulnerability to harm, such as by adjusting transportation design standards to withstand more intense storms, heat, and higher sea levels. This analysis will include a discussion of both in the context of this transportation project.

## Regulatory Setting

For a full list of laws, regulations, and guidance related to climate change (GHGs and adaptation), please refer to Caltrans' Standard Environmental Reference (SER), Chapter 16, Climate Change.

### Federal

To date, no nationwide numeric mobile-source GHG reduction targets have been established, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level.

The National Environmental Policy Act (NEPA) (42 United States Code [USC] Part 4332) requires federal agencies to assess the environmental effects of their proposed actions prior to making a decision on the action or project.

Early efforts by the federal government to improve fuel economy and energy efficiency to address climate change and its associated effects include The Energy Policy and Conservation Act of 1975 (42 USC Section 6201); and Corporate Average Fuel Economy (CAFE) Standards. The U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) sets and enforces corporate average fuel economy (CAFÉ) standards for on-road motor vehicles sold in the United States. The Environmental Protection Agency (U.S. EPA) calculates average fuel economy levels for manufacturers and also sets related GHG emissions standards for vehicles under the Clean Air Act. These standards are periodically updated and published through the federal rulemaking process.

**State**

California has been innovative and proactive in addressing GHG emissions and climate change by passing multiple Senate and Assembly bills and executive orders (EOs).

In 2005, EO S-3-05 initially set a goal to reduce California's GHG emissions to 80 percent below year 1990 levels by 2050, with interim reduction targets. Later EOs and Assembly and Senate bills refined interim targets and codified the emissions reduction goals and strategies. The California Air Resources Board (CARB) was directed to create a climate change scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases." Ongoing GHG emissions reduction was also mandated in Health and Safety Code (H&SC) Section 38551(b). In 2022, the California Climate Crisis Act was passed, establishing state policy to reduce statewide human- caused GHG emissions by 85 percent below 1990 levels, achieve net zero GHG emissions by 2045, and achieve and maintain negative emissions thereafter.

Beyond GHG reduction, the State maintains a climate adaptation strategy to address the full range of climate change stressors, and passed legislation requiring state agencies to consider protection and management of natural and working lands as an important strategy in meeting the state's GHG reduction goals.

## Environmental Setting

The proposed Project is in a rural area of San Bernardino County, with a developed road and street network surrounded by desert. I-40 is the main transportation route to and through the area for both passenger and commercial vehicles. The nearest alternate route is SR-66, which runs parallel to I-40 at an average distance of 0.25 miles. Traffic counts are low. Railroad tracks running parallel to I-40 right-of-way carry several passenger and freight trains each day. A Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by the Southern California

Association of Governments (SCAG), guides transportation and housing development in the area of the proposed Project. The San Bernardino County Regional Greenhouse Gas Reduction Plan and General Plan addresses GHGs in the proposed Project area.

### GHG Inventories

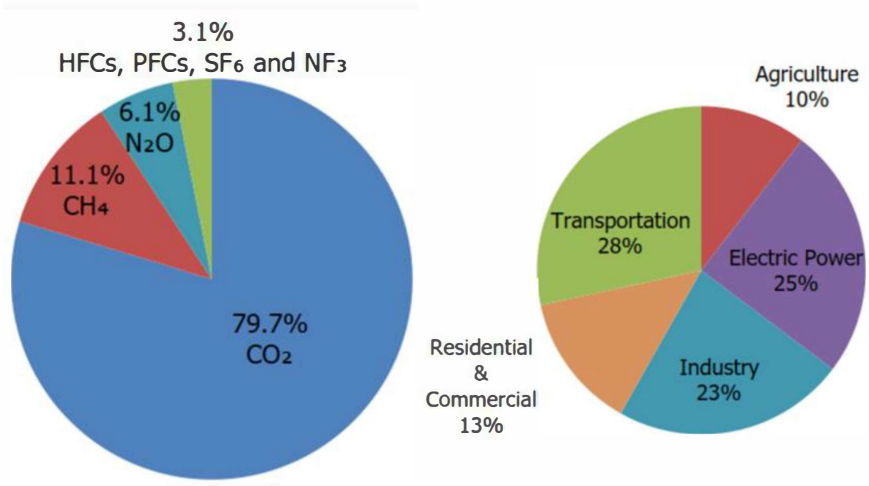
A GHG emissions inventory estimates the amount of GHGs discharged into the atmosphere by specific sources over a period of time. Tracking annual GHG emissions allows countries, states, and smaller jurisdictions to understand how emissions are changing and what actions may be needed to attain emission reduction goals. U.S. EPA is responsible for documenting GHG emissions nationwide, and the ARB does so for the state of California, as required by H&SC Section 39607.4. Cities and other local jurisdictions may also conduct local GHG inventories to inform their GHG reduction or climate action plans.

### National GHG Inventory

The annual GHG inventory submitted by the U.S. EPA to the United Nations provides a comprehensive accounting of all human-produced sources of GHGs in the United States. Total national GHG emissions from all sectors in 2022 were 5,489.0 million metric tons (MMT), factoring in deductions for carbon sequestration in the land sector. (Land Use, Land Use Change, and Forestry provide a carbon sink equivalent to 15% of total U.S. emissions in 2022 [U.S. EPA 2024a].) While total GHG emissions in 2022 were 17% below 2005 levels, they increased by 1% over 2021 levels. Of these, 80% were $CO_2$, 11% were $CH_4$, and 6% were $N_2O$; the balance consisted of fluorinated gases. From 1990 to 2022, CO2 emissions decreased by only 2% (U.S. EPA 2024a).

The transportation sector's share of total GHG emissions increased to 28% in 2022 and remains the largest contributing sector (Figure 4). Transportation activities accounted for 37% of U.S. CO2 emissions from fossil fuel combustion in 2022. This is a decrease of 0.5% from 2021 (U.S. EPA 2024a, 2024b).

**Figure 4. U.S. 2022 Greenhouse Gas Emissions**

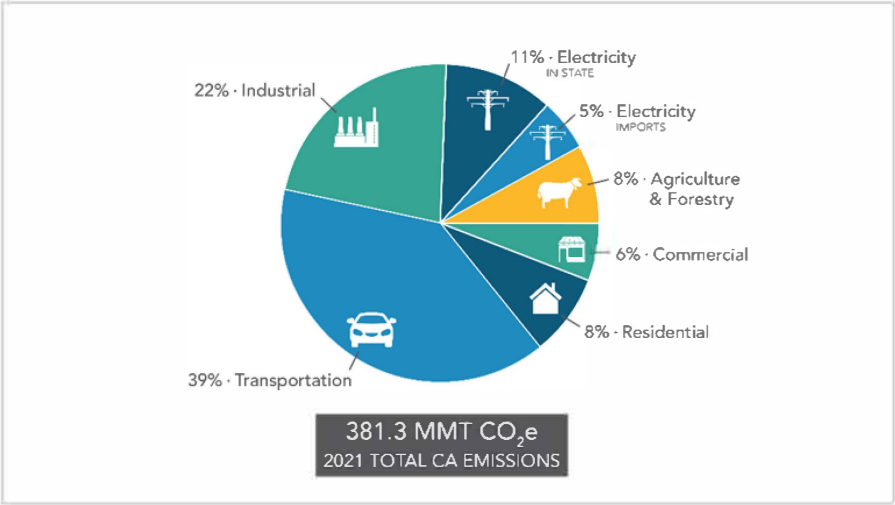



(Source: U.S. EPA 2024b)

## State GHG Inventory

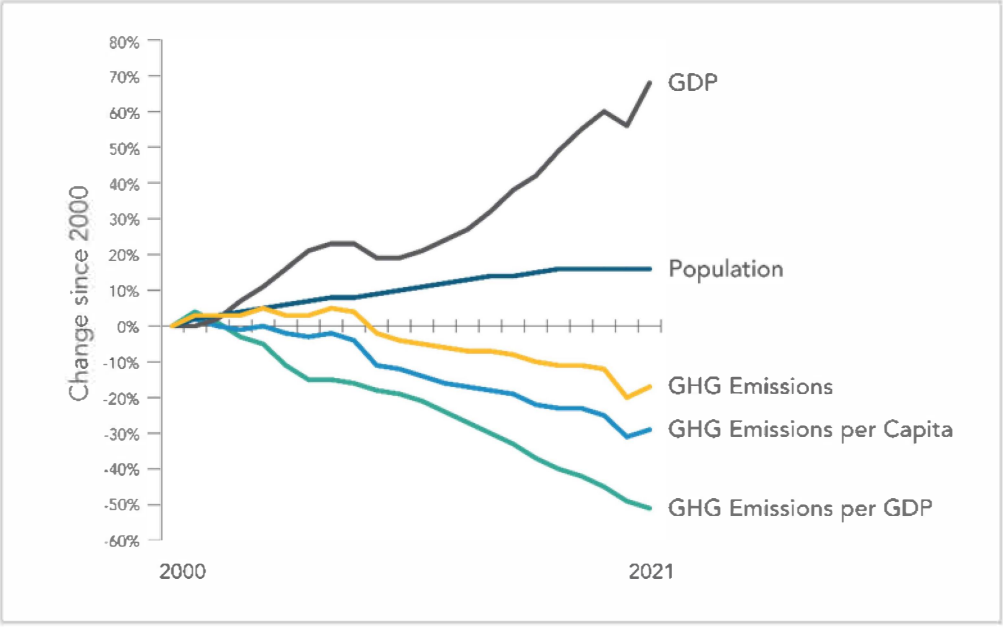
ARB collects GHG emissions data for transportation, electricity, commercial/residential, industrial, agricultural, and waste management sectors each year. It then summarizes and highlights major annual changes and trends to demonstrate the state's progress in meeting its GHG reduction goals. Overall statewide GHG emissions declined from 2000 to 2021 despite growth in population and state economic output (Figure 6) (ARB 2023). Transportation emissions remain the largest contributor to GHG emissions in the state (Figure 5)(ARB 2023).

**Figure 5. California 2021 Greenhouse Gas Emissions by Economic Sector**




(Source: ARB 2023)

**Figure 6. Change in California GDP, Population, and GHG Emissions since 2000**




(Source: ARB 2023)

AB 32 required ARB to develop a Scoping Plan that describes the approach California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020, and to update it every 5 years. The AB 32 Scoping Plan and the subsequent updates contain the main strategies California will use to reduce GHG emissions. ARB adopted the first scoping plan in 2008. The second updated plan, California's 2017 Climate Change Scoping Plan, adopted on December 14, 2017, reflects the 2030 target established in EO B-30-15 and SB 32. The 2022 Scoping Plan for Achieving Carbon Neutrality, adopted September 2022, assesses progress toward the statutory 2030 reduction goal and defines a path to reduce human-caused emissions to 85 percent below 1990 levels and achieve carbon neutrality no later than 2045, in accordance with AB 1279 (ARB 2022a).

**Regional Plans**

As required by *The Sustainable Communities and Climate Protection Act of 2008*, ARB sets regional GHG reduction targets for California's 18 metropolitan planning organizations (MPOs) to achieve through planning future projects that will cumulatively achieve those goals, and reporting how they will be met in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Targets are set at a percent reduction of passenger vehicle GHG emissions per person from 2005 levels. The proposed project is included in the RTP/SCS for SCAG. The regional reduction target for SCAG is 19 percent by 2035 (ARB 2021).

**Table 3-1. Regional GHG Reduction Policies**

| Title | GHG Reduction Policies, Goals, or Strategies |
|---|---|
| Southern California Association of Governments 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (adopted May 10, 2024) | • System Preservation and Resilience<br>• Complete Streets<br>• Transit and Multimodal Integration<br>• Transportation System Management<br>• Transportation Demand Management<br>• Air Quality<br>• Clean Transportation<br>• Goods Movement |
| San Bernardino County Regional Greenhouse Gas Reduction Plan (adopted March 2021) | • On-Road-1: Alternative Fueled Transit Fleets – CNG to Electric.<br>• On-Road-2: Encourage Use of Mass Transit, Carpooling, Ridesharing, and Telecommuting.<br>• On-Road-3: Improve Efficiency through Signal Synchronization.<br>• On-Road-4: Expand Bike Routes Including Pedestrian and Bicycle Friendly Streets<br>• On-Road-5 Community Fleet Electrification. |
| San Bernardino County Countywide Plan (adopted in 2020) | Natural Resources Element- Goal NR-1 Air Quality:<br>• Policy NR-1.7 Greenhouse gas reduction targets<br>• Policy NR-1.8 Construction and operations<br><br>Transportation & Mobility Element<br>Goal TM-3 Vehicle Miles Traveled:<br>• Policy TM-3.1 VMT reduction<br>• Policy TM-3.2 Trip reduction strategies<br>• Policy TM-3.3 First mile/last mile connectivity<br>Goal TM-4 Complete Streets, Transit & Active Transportation<br>• Policy TM-4.1 Complete streets network<br>• Policy TM-4.5 Transit access to job centers and tourist destinations<br>• Policy TM-4.7 Regional bicycle network<br>• Policy TM-4.8 Local bicycle and pedestrian networks |

## Project Analysis

GHG emissions from transportation projects can be divided into those produced during operation and use of the State Highway System (SHS) (operational emissions) and those produced during construction. The primary GHGs produced by the transportation sector are $CO_2$, $CH_4$, $N_2O$, and HFCs. $CO_2$ emissions are a product of burning gasoline or diesel fuel in internal combustion engines, along with relatively small amounts of $CH_4$ and $N_2O$. A small amount of HFC emissions related to refrigeration is also included in the transportation sector. (GHGs differ in how much heat each traps in the atmosphere, called global warming potential, or GWP. $CO_2$ is the most important GHG, so amounts of other gases are expressed relative to $CO_2$, using a metric called “carbon dioxide

equivalent", or $CO_2e$. The global warming potential of $CO_2$ is assigned a value of 1, and the GWP of other gases is assessed as multiples of $CO_2$).

The CEQA Guidelines generally address greenhouse gas emissions as a cumulative impact due to the global nature of climate change (Pub. Resources Code, § 21083(b)(2)). As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself." (Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497, 512.) In assessing cumulative impacts, it must be determined if a project's incremental effect is "cumulatively considerable" (CEQA Guidelines Sections 15064(h)(1) and 15130).

To make this determination, the incremental impacts of the project must be compared with the effects of past, current, and probable future projects. Although climate change is ultimately a cumulative impact, not every individual project that emits greenhouse gases must necessarily be found to contribute to a significant cumulative impact on the environment.

**Operational Emissions**

The purpose of this Project is to preserve, repair, and extend the life of the existing pavement and improve ride quality. Also, it is to bring the identified four culverts and RSTP for two bridges at Gas Line Wash to a state of good condition, to restore and extend their service life. This type of project generally causes minimal or no increase in operational GHG emissions. Because the Project would not increase the number of travel lanes on I-40, no increase in vehicle miles traveled (VMT) would occur. While some GHG emissions during the construction period would be unavoidable, no increase in operational GHG emissions is expected.

**Construction Emissions**

Construction GHG emissions would result from material processing and transportation, on-site construction equipment, and traffic delays due to construction. These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases. While construction GHG emissions are only produced for a short time, they have long-term effects in the atmosphere, so cannot be considered "temporary" in the same way as criteria pollutants that subside after construction is completed.

Use of long-life pavement, improved traffic management plans, and changes in materials can also help offset GHG emissions produced during construction by allowing longer intervals between maintenance and rehabilitation activities.

Based on the Project information provided, the Caltrans Construction Emissions Tool (CAL-CET) was used to estimate construction and greenhouse gas (GHG) emissions.

Overall construction emissions of GHGs would be 1,605.3 metric tons CO2e over the 240-day construction period.

All construction contracts include Caltrans Standard Specifications related to air quality. Section 7-1.02A and 7 1.02C, Emissions Reduction, requires contractors to comply with all laws applicable to the project and to certify they are aware of and will comply with all ARB emission reduction regulations. Section 14-9.02, Air Pollution Control, requires contractors to comply with all air pollution control rules, regulations, ordinances, and statutes. Certain common regulations, such as equipment idling restrictions, that reduce construction vehicle emissions also help reduce GHG emissions.

### CEQA Conclusion

The proposed Project purpose is to preserve, repair, and extend the life of the existing pavement and improve ride quality. Also, it is to bring the identified four culverts and RSP for two bridges at Gas Line Wash to a state of good condition, to restore and extend their service life. Construction GHG emissions would result during the construction phase at different levels, with overall construction GHG emissions of 1,605.3 metric tons CO2e. Furthermore, as this project would not increase the number of travel lanes on I-40, no increase in operational GHG emissions is expected to occur. Therefore, environmental impacts resulting from project GHG emissions are considered to be less than significant. The project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions.

Caltrans is firmly committed to implementing measures to help reduce GHG emissions. These measures are outlined in the following section.

## Greenhouse Gas Reduction Strategies

### Statewide Efforts

In response to Assembly Bill 32, the Global Warming Solutions Act, California is implementing measures to achieve emission reductions of GHGs that cause climate change. Climate change programs in California are effectively reducing GHG emissions from all sectors of the economy. These programs include regulations, market programs, and incentives that will transform transportation, industry, fuels, and other sectors to take California into a sustainable, cleaner, low-carbon future, while maintaining a robust economy (ARB 2022c).

Major sectors of the California economy, including transportation, will need to reduce emissions to meet 2030 and 2050 GHG emissions targets. The Governor’s Office of Planning and Research identified five sustainability pillars in a 2015 report: (1) Increasing the share of renewable energy in the State’s energy mix to at least 50 percent by 2030; (2) Reducing petroleum use by up to 50 percent by 2030; (3) Increasing the energy efficiency of existing buildings by 50 percent by 2030; (4) Reducing emissions of short-lived climate pollutants; and (5) Stewarding natural

resources, including forests, working lands, and wetlands, to ensure that they store carbon, are resilient, and enhance other environmental benefits (OPR 2015).

The transportation sector is integral to the people and economy of California. To achieve GHG emission reduction goals, it is vital that the state build on past successes in reducing criteria and toxic air pollutants from transportation and goods movement. GHG emission reductions will come from cleaner vehicle technologies, lower-carbon fuels, and reduction of vehicle miles traveled (VMT). Reducing today's petroleum use in cars and trucks is a key state goal for reducing greenhouse gas emissions by 2030 (California Environmental Protection Agency 2015).

In addition, SB 1386 (Wolk 2016) established as state policy the protection and management of natural and working lands and requires state agencies to consider that policy in their own decision making. Trees and vegetation on forests, rangelands, farms, and wetlands remove carbon dioxide from the atmosphere through biological processes and sequester the carbon in above- and below-ground matter.

Subsequently, Governor Gavin Newsom issued Executive Order N-82-20 to combat the crises in climate change and biodiversity. It instructs state agencies to use existing authorities and resources to identify and implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities and in particular low-income, disadvantaged, and vulnerable communities. To support this order, the California Natural Resources Agency released *Natural and Working Lands Climate Smart Strategy* (California Natural Resources Agency 2022).

### Caltrans Activities

Caltrans continues to be involved on the Governor's Climate Action Team as the ARB works to implement EOs S-3-05 and S-01-07 and help achieve the targets set forth in AB 32. EO B-30-15, issued in April 2015, and SB 32 (2016), set an interim target to cut GHG emissions to 40 percent below 1990 levels by 2030. The following major initiatives are underway at Caltrans to help meet these targets.

#### *Climate Action Plan for Transportation Infrastructure*

*The California Action Plan for Transportation Infrastructure* (CAPTI) builds on executive orders signed by Governor Newsom in 2019 and 2020 targeted at reducing GHG emissions in transportation, which account for more than 40 percent of all polluting emissions, to reach the state's climate goals. Under CAPTI, where feasible and within existing funding program structures, the state will invest discretionary transportation funds in sustainable infrastructure projects that align with its climate, health, and social equity goals (California State Transportation Agency 2021).

### *California Transportation Plan*

The California Transportation Plan (CTP) is a statewide, long-range transportation plan to meet our future mobility needs and reduce GHG emissions. It serves as an umbrella document for all the other statewide transportation planning documents. The CTP 2050 presents a vision of a safe, resilient, and universally accessible transportation system that supports vibrant communities, advances racial and economic justice, and improves public and environmental health. The plan's climate goal is to achieve statewide GHG emissions reduction targets and increase resilience to climate change. It demonstrates how GHG emissions from the transportation sector can be reduced through advancements in clean fuel technologies; continued shifts toward active travel, transit, and shared mobility; more efficient land use and development practices; and continued shifts to telework (Caltrans 2021a).

### *Caltrans Strategic Plan*

The Caltrans 2024-2028 Strategic Plan outlines goals centered on safety, climate action, and stewardship. Climate-related strategies include implementing the Caltrans Climate Action Plan; expanding climate education, training, and outreach; strengthening partnerships to support climate resilience; promoting sustainable transportation solutions that reduce emissions; and continuing to engage underserved and disproportionately impacted communities in climate planning and implementation.

### *Caltrans Policy Directives and Other Initiatives*

Caltrans Director's Policy 30 (DP-30) Climate Change (June 22, 2012) established a policy to ensure coordinated efforts to incorporate climate change into Caltrans decisions and activities. Other Director's policies promote energy efficiency, conservation, and climate change, and commit Caltrans to sustainability practices in all planning, maintenance, and operations. *Caltrans Greenhouse Gas Emissions and Mitigation Report* (Caltrans 2020) provides a comprehensive overview of Caltrans' emissions. It identifies additional opportunities for further reducing GHG emissions from Department-controlled emission sources, in support of Departmental and State goals.

### Project-Level GHG Reduction Strategies

The following measures will also be implemented in the project to reduce GHG emissions and potential climate change impacts from the project.

**GHG-1:** The contractor must comply with Standard Specification 7-1.02C (Emissions Reduction) which requires that the contractor certify awareness of CARB emissions reduction regulations and will comply with them.

**GHG-2:** The Project will maintain equipment in proper tune and working condition**.**

## Adaptation Strategies

Reducing GHG emissions is only one part of an approach to addressing climate change. Caltrans must plan for the effects of climate change on the state's transportation infrastructure and strengthen or protect the facilities from damage. Climate change is expected to produce increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and their intensity, and in the frequency and intensity of wildfires. Flooding and erosion can damage or wash out roads; longer periods of intense heat can buckle pavement and railroad tracks; storm surges combined with a rising sea level can inundate highways. Wildfire can directly burn facilities and indirectly cause damage when rain falls on denuded slopes that landslide after a fire. Effects will vary by location and may, in the most extreme cases, require that a facility be relocated or redesigned. Furthermore, the combined effects of transportation projects and climate stressors can exacerbate the impacts of both on vulnerable communities in a project area. Accordingly, Caltrans must consider these types of climate stressors in how highways are planned, designed, built, operated, and maintained.

### Federal Efforts

Under NEPA Assignment, Caltrans is obligated to comply with all applicable federal environmental laws and FHWA NEPA regulations, policies, and guidance.

The *Fifth National Climate Assessment*, published in 2023, presents the most recent science and "analyzes the effects of global change on the natural environment, agriculture, energy production and use, land and water resources, transportation, human health and welfare, human social systems, and biological diversity; [It] analyzes current trends in global change, both human-induced and natural, and projects major trends for the subsequent 25 to 100 years … to support informed decision-making across the United States." Building on previous assessments, it continues to advance "an inclusive, diverse, and sustained process for assessing and communicating scientific knowledge on the impacts, risks, and vulnerabilities associated with a changing global climate" (U.S. Global Change Research Program 2023).

The National Oceanic and Atmospheric Administration (NOAA) provides sea level rise projections for all U.S. coastal waters to help communities and decision makers assess their risk from sea level rise. Updated projections through 2150 were released in 2022 in a report and online tool (NOAA 2022).

### State Efforts

Climate change adaptation for transportation infrastructure involves long-term planning and risk management to address vulnerabilities in the transportation system. A number of state policies and tools have been developed to guide adaptation efforts.

*California's Fourth Climate Change Assessment* (Fourth Assessment) (2018) provides information to help decision makers across sectors and at state, regional, and local scales protect and build the resilience of the state's people, infrastructure, natural systems, working lands, and waters. The Fourth Assessment reported that if no measures are taken to reduce GHG emissions by 2021 or sooner, the state is projected to experience an up to 8.8 degrees Fahrenheit increase in average annual maximum daily temperatures; a two-thirds decline in water supply from snowpack resulting in water shortages; a 77% increase in average area burned by wildfire; and large-scale erosion of up to 67% of Southern California beaches due to sea level rise. These effects will have profound impacts on infrastructure, agriculture, energy demand, natural systems, communities, and public health (State of California 2018).

Sea level rise is a particular concern for transportation infrastructure in the coastal zone. Major urban airports will be at risk of flooding from sea level rise combined with storm surge as early as 2040; San Francisco airport is already at risk. Miles of coastal highways vulnerable to flooding in a 100-year storm event will triple to 370 by 2100, and 3,750 miles will be exposed to temporary flooding. The Fourth Assessment's findings highlight the need for proactive action to address these current and future impacts of climate change.

To help actors throughout the state address the findings of California's Fourth Climate Change Assessment, AB 2800's multidisciplinary Climate-Safe Infrastructure Working Group published *Paying it Forward: The Path Toward Climate-Safe Infrastructure in California*. This report provides guidance on assessing risk in the face of inherent uncertainties still posed by the best available climate change science. It also examines how state agencies can use infrastructure planning, design, and implementation processes to respond to the observed and anticipated climate change impacts (Climate-Safe Infrastructure Working Group 2018).

EO S-13-08, issued in 2008, directed state agencies to consider sea level rise scenarios for 2050 and 2100 during planning to assess project vulnerabilities, reduce risks, and increase resilience to sea level rise. It gave rise to the 2009 *California Climate Adaptation Strategy*, the Safeguarding California Plan, and a series of technical reports on statewide sea level rise projections and risks, including the *State of California Sea-Level Rise Guidance Update* in 2018. The reports addressed the full range of climate change impacts and recommended adaptation strategies. The current *California Climate Adaptation Strategy* incorporates key elements of the latest sector-specific plans such as the *Natural and Working Lands Climate Smart Strategy*, *Wildfire and Forest Resilience Action Plan*, *Water Resilience Portfolio,* and the CAPTI (described above). Priorities in the 2023 *California Climate Adaptation Strategy* include acting in partnership with California Native American Tribes, strengthening protections for climate-vulnerable communities that lack capacity and resources, implementing nature-based climate solutions, using best available climate science, and partnering and collaboration to best leverage resources (California Natural Resources Agency 2023).

EO B-30-15 recognizes that effects of climate change threaten California's infrastructure and requires state agencies to factor climate change into all planning and investment decisions. Under this EO, the Office of Planning and Research published *Planning and Investing for a Resilient California: A Guidebook for State Agencies*, to encourage a uniform and systematic approach to building resilience.

SB 1 Coastal Resources: Sea Level Rise (Atkins 2021) established statewide goals to "anticipate, assess, plan for, and, to the extent feasible, avoid, minimize, and mitigate the adverse environmental and economic effects of sea level rise within the coastal zone." As the legislation directed, the Ocean Protection Council collaborated with 17 state planning and coastal management agencies to develop the *State Agency Sea-Level Rise Action Plan for California* in February 2022. This plan promotes coordinated actions by state agencies to enhance California's resilience to the impacts of sea level rise (California Ocean Protection Council 2022).

### Caltrans Adaptation Efforts

#### *Caltrans Vulnerability Assessments*

Caltrans completed climate change vulnerability assessments to identify segments of the State Highway System vulnerable to climate change effects of precipitation, temperature, wildfire, storm surge, and sea level rise.

The climate change data in the assessments were developed in coordination with climate change scientists and experts at federal, state, and regional organizations at the forefront of climate science. The findings of the vulnerability assessments will guide analysis of at-risk assets and development of Adaptation Priority Reports as a method to make capital programming decisions to address identified risks.

#### *Caltrans Sustainability Programs*

The Director's Office of Equity, Sustainability and Tribal Affairs supports implementation of sustainable practices at Caltrans. The Sustainability Roadmap is a periodic progress report and plan for meeting the Governor's sustainability goals related to EOs B-16-12, B-18-12, and B-30-15. The Roadmap includes designing new buildings for climate change resilience and zero-net energy, and replacing fleet vehicles with zero-emission vehicles (Caltrans 2023).

### Project Adaptation Analysis

#### *Sea Level Rise*

The proposed Project is outside the coastal zone and not in an area subject to sea-level rise. Accordingly, direct impacts on transportation facilities due to projected sea-level rise are not expected.

#### *Precipitation and Flooding*

Based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map Number 06071C4625H and 06071C4650H for San Bernardino

County) the Project is located in an area designated as Zone D (areas in which flood hazards are undetermined, but possible). Based on the Caltrans District 8 Vulnerability Assessment Map (Caltrans 2023), the 100-year storm precipitation depth in the project area is expected to increase by up to 1.5% by 2055, and up to 1.2% by 2085.

### *Wildfire*

Based on the Caltrans District 8 Vulnerability Assessment Map (Caltrans 2023), wildfire exposure is not anticipated for 2010 through 2069. Based on the CalFire Local Responsibility Area Fire Hazard Severity Zones map, the Project site and adjacent areas are located in a Moderate Hazard Severity Zone in the Local Responsibility Area (LRA).

### *Temperature*

Based on the Caltrans District 8 Vulnerability Assessment Map (Caltrans 2023), the average minimum air temperature in the project area is projected to increase by 4.2-4.5 degrees Fahrenheit by 2055, and by 7.6-7.8 degrees Fahrenheit by 2085. The average maximum temperature over seven consecutive days in the project area will increase by up to 5.77 degrees Fahrenheit by 2055, and by up to 9.0 degrees Fahrenheit by 2085. As such, the climate specific to the Project's location will be taken into consideration for selection of roadway pavement and structural materials in order to select the materials most appropriate for the Project as required during design.

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# Chapter 3 Comments and Coordination

Early and continuing coordination with the general public and appropriate public agencies is an essential part of the environmental review process. It helps planners determine the scope of environmental documentation and the level of analysis required and identify potential impacts and avoidance, minimization, and/or mitigation measures and related environmental requirements. This section summarizes the results of Caltrans' efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

## Native American Tribes

The California Native American Heritage Commission (NAHC) was contacted, and a request was made for the Sacred Lands File search on June 18, 2025. The NAHC provided a response letter on July 8, 2025 with a list of Native American tribal contacts. The following Native American tribes were contacted:

- Kern Valley Indian Community: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Morongo Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Quechan Indian Tribe of the Fort Yuma Reservation: Initial letter sent on June 23, 2025 and response received on June 23, 2025 deferring to local tribes. No other responses have been received.

- San Fernando Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Serrano Nation of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Twenty-Nine Palms Band of Mission Indians: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

- Yuhaaviatam of San Manuel Nation: Initial letter sent on June 23, 2025 with follow up letters sent on July 23, 2025 and August 28, 2025. No responses have been received.

## Public Participation

This Draft Initial Study will be circulated and made available for public review and comment during the public review period. The public notice and opportunity to request a public hearing will be distributed to the state, regional, and local agencies and elected officials, as well as interested groups, organizations, individuals, and applicable federal agencies as listed in Distribution List in Chapter 5, page 77.

# **Chapter 4** List of Preparers

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# **Chapter 5** Distribution List

A public notice of this IS was distributed to state, regional, and local agencies, and elected officials. In addition, all property owners within a 500-foot radius of the project limits were provided the public notice. The Distribution List of Public Agencies, and Elected Officials is followed by the list of Interested Parties, Property Owners, and Members of the Public.

### Public Agencies and Elected Officials

| | | |
|---|---|---|
| CALIFORNIA DEPT. OF FISH & WILDLIFE (REGION 6)<br>3602 INLAND EMPIRE BOULEVARD, #C-220<br>ONTARIO, CA 91764 | CALIFORNIA TRANSPORTATION COMMISSION<br>COMMISSION CHAIR<br>1120 N STREET, ROOM 2221<br>SACRAMENTO, CA 95814 | U.S. FISH AND WILDLIFE SERVICE<br>777 EAST TAHQUITZ CANYON WAY, SUITE 208<br>PALM SPRINGS, CA 92262 |
| CALIFORNIA DEPT OF TOXIC SUBSTANCES<br>5796 CORPORATE AVE<br>CYPRESS, CA 90630 | NATIVE AMERICAN HERITAGE COMMISSION<br>1550 HARBOR BLVD, SUITE 100 WEST<br>SACRAMENTO, CA 95694 | CALIFORNIA HIGHWAY PATROL<br>300 EAST MT. VIEW ST<br>BARSTOW, CA 92311 |
| SAN BERNARDINO COUNTY FIRST DISTRICT SUPERVISOR<br>385 N. ARROWHEAD AVE, 5TH FLR<br>SAN BERNARDINO, CA 92415 | SAN BERNARDINO COUNTY PUBLIC WORKS<br>825 EAST THIRD STREET<br>SAN BERNARDINO, CA 92415 | CAL FIRE SOUTHERN REGION<br>3800 N. SIERRA WAY<br>SAN BERNARDINO, CA 92405 |
| ASSEMBLYMEMBER JUAN CARRILLO<br>823 EAST AVENUE Q-9, STE B<br>PALMDALE, CA 93550 | SENATOR SUZETTE VALLADARES<br>11600 AIR EXPRESSWAY<br>ADELANTO, CA 92301 | SAN BERNARDINO COUNTY SHERIFF, BARSTOW STATION<br>225 EAST MT. VIEW ST<br>BARSTOW, CA 92311 |
| COUNTY OF SAN BERNARDINO FIRE DEPT, HARVARD STATION<br>39059 KATHY LANE<br>NEWBERRY SPRINGS, CA 92365 | | |

## Interested Parties, Property Owners, and Members of the Public

| | | |
|---|---|---|
| AHN FAMILY TRUST (05-21-05)<br>12403 THORNWOOD DR<br>BAKERSFIELD, CA 93311 | BAUCH, FRANCES M REV LIV TR<br>2585 S SALEROSO DR<br>ROWLAND HTS, CA 91748 | GORDON, CHAD MICHAEL TRUST<br>3419 KALLIN AVE<br>LONG BEACH, CA 90808 |
| BNSF BARSTOW INTERMODAL FACILITY<br>2825 MAIN STREET<br>BARSTOW, CA 92311 | URCH, JOHN<br>46680 NATIONAL TRAILS HWY<br>NEWBERRY SPRINGS, CA 92365 | PAEK, DAE CHEON<br>1110 WILADONDA DR<br>LA CANADA, CA 91011 |
| SPERRY, WESLEY<br>PO BOX 303<br>NEWBERRY SPRINGS, CA 92365 | MOJAVE PIPELINE COMPANY<br>PO BOX 1087<br>COLORADO SPRINGS, CO 80903 | NEARY, LAILA A<br>104 WESTBURY CT<br>CHAPEL HILL, NC 27516 |
| POPE, TERRY L REVOCABLE TRUST<br>3109 BRIDGEWATER CIR<br>HEMET, CA 92545 | RHODES, JOHN C.<br>24 SAND CRK<br>CATHEDRAL CITY, CA 92234 | RAMOS FAMILY LIVING TRUST<br>2675 CHESTNUT AVE<br>LONG BEACH, CA 90806 |
| STEARN, FREDERIC E REV TR<br>P O BOX 356<br>NEWBERRY SPRINGS, CA 92365 | ALBERT, LEONA S TR<br>694 COLDBROOK PL<br>SIMI VALLEY, CA 93065 | STATE OF CALIFORNIA<br>1807 13TH ST<br>SACRAMENTO, CA 95814 |
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| WARD, RAYMOND<br>P O BOX 358<br>NEWBERRY SPRINGS, CA 92365 | SPERRY, KELLY<br>46756 NATIONAL TRAILS HWY<br>NEWBERRY SPRINGS, CA 92365 | LOO, DORI<br>3091 CENTRAL<br>RIVERSIDE, CA 92506 |
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| GORDON, CHAD MICHAEL TRUST<br>3419 KALLIN AVE<br>LONG BEACH, CA 90808 | HLD TRUST<br>2700 KADEMA DR<br>SACRAMENTO, CA 95864 | BAUCH, FRANCES M REV LIV TR<br>2585 S SALEROSO DR<br>ROWLAND HTS, CA 91748 |
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| | | |
|---|---|---|
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| EDIGA, NARASHIMA B<br>3442 RAVINE DR<br>CARLSBAD, CA 92010 | DRAKE, WILLIAM P - EST OF<br>1872 GLENBROOK LN<br>LINCOLN, CA 95648 | MCCOY FAMILY TRUST<br>4332 MIAMI CT<br>SAN DIEGO, CA 92117 |
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| PHAM, MICHAEL<br>1327 W HOLT AVE<br>POMONA, CA 91768 | WOOKEY, DELPHIA<br>26562 PEPITA DR<br>MISSION VIEJO, CA 92691 | ERMAN, NANCY<br>6529 E JENSEN ST<br>MESA, AZ 85205 |
| GHAZAEI, MOHAMMAD<br>933 W COLLINS AVE<br>ORANGE, CA 92867 | WOO, WILLIAM<br>620 N 5TH ST<br>LA PUENTE, CA 91744 | MOJAVE PIPELINE COMPANY<br>P O BOX 10269<br>BAKERSFIELD, CA 93307 |
| JORDAN DESERT PROPERTY LLC<br>4825 S HIGHWAY 95 #2-501<br>FORT MOHAVE, AZ 86426 | KOZMATA, JOSEPH W TRUST - EST<br>10533 SERENGETI DR<br>LITTLETON, CO 80124 | LIN, KUAN JUNG<br>2026 TURNBULL CANYON RD<br>HACIENDA HEIGHTS, CA 91745 |
| L&J DUNCAN FM LIMITED PARTNERSHIP<br>2700 KADEMA DR<br>SACRAMENTO, CA 95864 | LE MELLE, LENDON/CECILIA 1996 TRUST<br>3161 E KINGS DR<br>ONTARIO, CA 91762 | RAMOS, AMBER M<br>108 CAL AVE #74<br>BARSTOW, CA 92311 |
| SAYEGH, HANI & FRANCES REVOC TR<br>1576 GAYWOOD DR<br>ALTADENA, CA 91001 | HOOSHPACK DEVELOPMENT INC<br>2929 QUEENSBURY DR<br>LOS ANGELES, CA 90064 | SHEARS, ROBERT V<br>P O BOX 159<br>NEWBERRY SPRINGS, CA 92365 |
| PAIK FAMILY TRUST 12/20/12<br>629 TRACTION AVE APT 620<br>LOS ANGELES, CA 90013 | WANG, MARGARET<br>6266 CALLISTO LN<br>EASTVALE, CA 91752 | NGUYEN, CUONG VAN<br>871 CLEARFIELD LN<br>CINCINNATI, OH 45240 |
| GUDLOW, MICHAEL<br>3661 SUTTER CT<br>OCEANSIDE, CA 92056 | PW REAL ESTATE VENTURES LLC<br>166 W WASHINGTON ST STE 730<br>CHICAGO, IL 60602 | GLASS TRUST<br>4311 W 160TH ST<br>LAWNDALE, CA 90260 |
| REEVES, MARSHA J<br>PO BOX 262<br>NEWBERRY SPRINGS, CA 92365 | THOMAS, JERRY L<br>24895 LITTLE TEEPEE RD<br>APPLE VALLEY, CA 92307 | VARGAS, PAULA E<br>1604 GLENVIEW ST<br>SAN BERNARDINO, CA 92411 |
| DL INVESTORS 1 LLC<br>166 W WASHINGTON ST STE 730<br>CHICAGO, IL 60602 | NEWBERRY 66 PARTNERS<br>3425 E RUSSELL RD UNIT 157<br>LAS VEGAS, NV 89120 | FERGUSON, RICK A<br>18282 AVOLINDA DR<br>YORBA LINDA, CA 92886 |

| | | |
|---|---|---|
| CALICO GHOST ASSOCIATES LLC<br>1535 N ELSTON AVE<br>CHICAGO, IL 60642 | BAUCH, FRANCES M REV LIV TR - EST OF<br>2585 S SALEROSO DR<br>ROWLAND HTS, CA 91748 | JR PLAZA LLC<br>2343 SUNSET CURV<br>UPLAND, CA 91784 |
| JONES, CLAYTON<br>44489 TOWN CENTER WAY #D275<br>PALM DESERT, CA 92260 | GONZALES, VINCENT<br>16222 JOSHUA ST<br>HESPERIA, CA 92345 | ESTIVARIZ, ROY<br>2015 SW 3RD ST APT 6<br>MIAMI, FL 33135 |
| BARSTOW PARTNERS LLC<br>632 S HOPE AVE STE 6<br>ONTARIO, CA 91761 | DODGE FAMILY TRUST 7-21-08<br>47850 NATIONAL TRAILS HWY<br>NEWBERRY SPRINGS, CA 92365 | LA BOUEF, MARK & NELLIE FAMILY TRUST<br>145 DECKHAND RD<br>HARDIN, KY 42048 |
| YNIGUEZ, BASILIO<br>47801 LAKE IRENE DR<br>NEWBERRY SPRINGS, CA 92365 | SHOEMAKER, GARY<br>P O BOX 281<br>NEWBERRY SPRINGS, CA 92365 | PRUETT, ANDREA LIVING TRUST<br>46548 NATIONAL TRAILS HWY<br>NEWBERRY SPRINGS, CA 92365 |
| LORENZO FAMILY TRUST 12/2/20<br>2829 PUENTE ST<br>FULLERTON, CA 92835 | PIERCE, ANN<br>31557 NEWBERRY RD<br>NEWBERRY SPRINGS, CA 92365 | DV FINANCIAL GROUP<br>23679 CALABASAS RD STE 1022<br>CALABASAS, CA 91302 |
| PAULIN, GERALDINE MAY<br>7191 KENSINGTON DR<br>BUENA PARK, CA 90620 | WARD, RAYMOND II<br>PO BOX 358<br>NEWBERRY SPRINGS, CA 92365 | BERRY, THERESA ANN<br>PO BOX 398<br>NEWBERRY SPRINGS, CA 92365 |
| SUNRAY TRUST<br>8342 GARDEN GROVE BLVD #10<br>GARDEN GROVE, CA 92844 | | |

# **Appendix A** Environmental Commitments Record

The mitigation program for the proposed Project is outlined in the following Environmental Commitments Record (ECR), which also includes avoidance and minimization measures to be implemented and the anticipated permits required for the Project.

| Permit Type | Agency | Date Received | Expiration | Notes |
|---|---|---|---|---|
| 1600 | California Department of Fish and Wildlife | TBD | | |
| 401 | Regional Water Quality Control Board | TBD | | |
| 404 | U.S. Army Corps of Engineers | TBD | | |

Date of ECR: December 2025

Project Phase:
☒ PA/ED (*DED/FED*)
☐ PS&E Submittal_____ %
☐ Construction

# ENVIRONMENTAL COMMITMENTS RECORD (Interstate 40 Minor Pavement Rehabilitation Project)

08-SBd-40
PM R15.0/R28.8

EA 08-1M390
PN 0820000106
Generalist: Bahram Karimi
ECL:

| Avoidance, Minimization, and/or Mitigation Measures | Page | Environmental Analysis Source | Responsible for Development and/or Implementation of Measure | Timing/ Phase | SSP or NSSP: | Action(s) Taken to Implement Measure/if checked No, add Explanation here | PS&E Task Complete | Construction Task Complete | Environmental Compliance | | Measure Type |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| **CULTURAL RESOURCES** | | | | | | | | | | | |
| **CUL-1:** If buried cultural resources are encountered during Project Activities, it is Caltrans policy that work stop within 60 feet of the area until a qualified archaeologist can evaluate the nature and significance of the find. | **37** | Initial Study/Mitigated Negative Declaration (ISMND) | District Cultural Studies/ District Design/ Resident Engineer/ Contractor | Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
☒ PA/ED (*DED/FED*)
☐ PS&E Submittal_____ %
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| **CUL-2: I**f human remains are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to CA Public Resources Code (PRC) Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendant (MLD). At this time, the person who discovered the remains will contact Gabrielle Duff, District Environmental Branch Chief | 37 | ISMND | District Cultural Studies/ District Design/ Resident Engineer/ Contractor | Final Design, Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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☐ PS&E Submittal_____ %
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| [(909) 501-5142] or Julie Scrivner, District Native American Coordinator [(909) 260-8265] so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable. | | | | | | | | | | | |
| **BIOLOGICAL RESOURCES** | | | | | | | | | | | |
| **BIO-General-1. Equipment Staging, Storing & Borrow Sites.** All staging, storing, and borrow sites require the approval of the Caltrans biologist. | 47 | Natural Environment Study-Condensed Format) (NESCF) October 2025 | District Design / District Environmental Planning / Resident Engineer / Contractor | Final Design, Prior to Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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☐ PS&E Submittal_____ %
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| **BIO-General-2: Pre-Construction Insect Host Plant Clearance Surveys.** Within three (3) days prior to construction, a Contractor-supplied biologist will conduct pre-construction clearance surveys for rare plants and rare insect host-plants for all locations with proposed vegetation removal. If rare plant individuals or rate-insect obligate host species (milkweed) are discovered within the work limits, these will be flagged for avoidance, and the Contractor-supplied biologist will notify the Resident Engineer and | 47 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer / Contractor-supplied Biologist | Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| Caltrans Biological Stewardship unit within 24-hours. | | | | | | | | | | | |
| **BIO-General-3: Biological Resource Compliance Monitor.** A Contractor-supplied biologist will monitor construction activities daily to ensure project compliance with biological resource protection measures and to ensure no effects and/or no take to listed or special-status plant or wildlife species including rare plants, desert tortoise, and nesting birds. If an active next or special-status wildlife is discovered, | 47 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer/ Contractor-supplied Biologist | Prior to Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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☐ PS&E Submittal_____ %
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| the Contractor-supplied biologist will establish an appropriate no-construction buffer and will notify the Resident Engineer and Caltrans Biological Stewardship unit of the discovery within 24-hours. | | | | | | | | | | | |
| **BIO-General-4: Preconstruction Survey.** Preconstruction desert tortoise surveys must be conducted by a Caltrans approved biologist 3 days prior to project activities within the BSA. If a desert tortoise is located, the Resident Engineer and Caltrans | 47 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer/ Caltrans approved Biologist | Prior to Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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☐ PS&E Submittal_____ %
☐ Construction

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| biologist must be contacted, and additional measures and/or agency coordination may be required. | | | | | | | | | | | |
| **BIO-General-5: Pre-Construction Nesting Bird Clearance Survey.** Preconstruction nesting bird clearance surveys must be conducted by a Caltrans approved biologist 3 days prior to project activities within the BSA. If an active nest is located, the Caltrans biologist and Resident Engineer will establish a no-construction avoidance buffer. The Caltrans biologist will monitor | 47 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer/ Caltrans approved Biologist | Prior to Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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☐ PS&E Submittal_____ %
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| the nest until the young have fledged or the nest is no longer active. | | | | | | | | | | | |
| **BIO-General-6: Species Avoidance.** If during project activities a desert tortoise is discovered within the project site, all construction activities must stop within 50 feet and the Caltrans biologist and Resident Engineer must be notified. Coordination with resource agencies may be required prior to restarting activities | 47 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer / Contractor | Final Design, Prior to Construction | | | | | | | Avoidance/ minimization |
| **BIO-7: Worker Environmental Awareness Program (WEAP).** A Caltrans | 47 | NESCF October 2025 | District Design / District Environmental | Final Design, Prior to | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| approved biologist must present a biological resource information program/WEAP for special status plants, nesting birds, special status wildlife including desert tortoise and desert bighorn sheep prior to project activities to all personnel that will be present within the project limits for longer than 30 minutes at any given time.. | | | Planning / Resident Engineer / Contractor/ Caltrans approved Biologist | Construction | | | | | | | |
| **BIO-General-9: Trash Prevention.** Caltrans will implement measures to reduce the attractiveness of work sites to common ravens (Corvus corax) and other | 47 | NESCF October 2025 | District Design / District Environmental Planning / Resident | Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| subsidized predators by controlling trash and educating workers. | | | Engineer/ Contractor | | | | | | | | |
| **BIO-Reptile-1: Equipment Flagging.** After each shift, order project personnel to attach surveyor flagging tape to a conspicuous place on each piece of equipment to remind the operator to check under the equipment for desert tortoises before operating equipment during the next shift. | 58 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer / Contractor | Final Design, Prior to Construction | | | | | | | Avoidance/ minimization |
| **BIO-PSM-1:** Caltrans will contribute funds toward the Raven Fund. | 58 | NESCF October 2025 | District Design / District Environmental Planning / | Prior to Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| | | | Resident Engineer | | | | | | | | |
| **BIO-Desert Tortoise Mitigation.** Caltrans proposes to mitigate for temporary and permanent impacts within desert tortoise critical habitat. Additionally, Caltrans proposes to mitigate for temporary and permanent impacts within suitable desert tortoise habitat. | 58 | NESCF October 2025 | District Design / District Environmental Planning / Resident Engineer | Prior to Construction | | | | | | | Mitigation |
| **TRANSPORTATION** | | | | | | | | | | | |
| **TRA-1:** Prior to construction, a TMP will be prepared to minimize potential impacts on emergency services and | 42 | ISMND | District Design / District Traffic Management / District | Final Design, Prior to | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| commuters during construction. | | | Environmental Planning / Resident Engineer / Contractor | Construction | | | | | | | |
| **HAZARDOUS WASTE / MATERIALS** | | | | | | | | | | | |
| **HAZ-1:** Project will be performed in accordance with Caltrans Standard Specification 6-1.03 “Local Material”. | 1 | Initial Site Assessment (ISA) Checklist Update September 2025 | District Design / District Environmental Engineering / Resident Engineer / Contractor | Final Design, Construction | SSP 6-1.03 | | | | | | Avoidance/ minimization |
| **HAZ-2:** Project will be performed in accordance with Caltrans Standard | 1 | ISA Checklist Update September 2025 | District Design / District Environmental Engineering / | Prior, During Construction | SSP 14-11.14 | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| Specifications Section 14-11.14 for treated wood waste. | | | Resident Engineer / Contractor | | | | | | | | |
| **HAZ-3** Project will be performed in accordance with Caltrans Standard Specifications Section 14-9.02 “Air Pollution Control” [National Emission Standards for Hazardous Air Pollutants (NESHAP) notification for air pollution control during bridge demolition or rehabilitation]. | 1 | ISA Checklist Update September 2025 | District Design / District Environmental Engineering / Resident Engineer / Contractor | During Construction | SSP 14-9.02 | | | | | | Avoidance/ minimization |
| **HAZ-4** Project will be performed in accordance with Caltrans Standard Specifications Section 36-4 “Residue Containing Lead | 1 | ISA Checklist Update September 2025 | District Design / District Environmental Engineering / Resident | During Construction | SSP 36-4 | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

Project Phase:
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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| from Paint and Thermoplastic". | | | Engineer / Contractor | | | | | | | | |
| **HAZ-5** Project will be performed in accordance with Caltrans Standard Specifications Section 84-9.03B "Remove Traffic Stripes and Pavement Markings Containing Lead". | 1 | ISA Checklist Update September 2025 | District Design / District Environmental Engineering / Resident Engineer / Contractor | Prior, During Construction | SSP 84-9.03B | | | | | | Avoidance/ minimization |
| **HAZ-6** ADL testing is currently in progress and is expected to be completed by January 2026. In the event that the survey reveals the presence of ADL, all recommendations will be followed. | 1 | ISA Checklist Update September 2025 | District Design / District Environmental Engineering / Resident Engineer / Contractor | Final Design, During Construction | | | | | | | Avoidance/ minimization |

Date of ECR: December 2025

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|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | Date / Initials | Date / Initials | YES | NO | |
| **Greenhouse Gas Emissions** | | | | | | | | | | | |
| **GHG-1:** The contractor must comply with Standard Specification 7-1.02C (Emissions Reduction) which requires that the contractor certify awareness of CARB emissions reduction regulations and will comply with them. | 41 | ISMND | District Design / District Environmental Engineering / Resident Engineer / Contractor | Construction | | | | | | | Avoidance/ minimization |
| **GHG-2:** The Project will maintain equipment in proper tune and working condition. | 41 | ISMND | Resident Engineer / Contractor | Construction | | | | | | | Avoidance/ minimization |

# **Appendix B** List of Technical Studies

The following studies and/or technical analyses have been prepared and are incorporated by reference into this Initial Study:

Historic Property Survey Report (HPSR). September 2025.

Construction Greenhouse Gases (GHG) Emissions Estimate. May 2025.

Initial Site Assessment (ISA) Checklist. May 2025.

Initial Site Assessment (ISA) Checklist Update. September 2025.

Location Hydraulic Study/Floodplain Evaluation Report Summary Memorandum. June 2025.

Natural Environment Study (Condensed Format). October 2025.

Scoping Questionnaire for Water Quality Issues. October 2025.