I-40 Bridge Scour Project

SAN BERNARDINO COUNTY, CALIFORNIA
DISTRICT 08 –SBd–40 (PM R139.0/R152.2)
1M420/PN 0821000103

Initial Study with Proposed Mitigated Negative Declaration



Prepared by the
State of California, Department of Transportation

March 2026

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 the alternatives being considered for the proposed Project located in the City of Needles, San Bernardino County, California. Caltrans is the lead agency under the California Environmental Quality Act (CEQA). The document tells you why the project is being proposed, what alternatives have been considered for the Project, how the existing environment could be affected by the Project, the potential impacts of each of the alternatives, and the 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 Caltrans District 8, 464 West 4th Street, San Bernardino, CA 92401.
- We'd like to hear what you think. If you have any comments about the proposed Project, please send your written comments via postal mail or email to Caltrans by the deadline.
- Send comments via postal mail to:
  Cesar Garcia, Acting Senior Environmental Scientist Supervisor
  California Department of Transportation, District 8
  464 West 4th Street, MS829
  San Bernardino, CA 92401-1400
- Send comments via email to: 08-1M420@dot.ca.gov
- Be sure to send comments by the deadline: **April 23, 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) do additional environmental studies, or (3) abandon the Project. If the Project is given environmental approval and funding is obtained, Caltrans could design and construct 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: Jaspinder Hampal, Chief of Public and Media Affairs, 464 West Fourth Street, San Bernardino, 92401, (909) 553-6837 (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.

State Clearinghouse# _____
08-SBd-40 PM R139.0/R152.2
EA 08-1M420/PN 0821000103

Improve and upgrade structures and other deficiencies along Interstate 40 from Post Mile R139.0 to R152.2 in Needles, San Bernardino County, California.

Initial Study
with Proposed Mitigated Negative Declaration

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

THE STATE OF CALIFORNIA
Department of Transportation



3/11/2026

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

Date

The following persons may be contacted for more information about this document:
Cesar Garcia, Acting Senior Environmental Scientist Supervisor, Caltrans District 8, 464 West 4th Street, MS-829, San Bernardino, CA 92401-1400, (909) 472-1699, Cesar.Garcia@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 upgrade structures and improve other deficiencies along Interstate 40 from Post Mile R139.0 to R152.2 in Needles, San Bernardino County, California. Improvements would include replacing the existing Rock Slope Protection, and partially grouted rock slope protection apron areas at Whale Mountain Wash (Bridge Numbers 54-0668L and 54-0668R) per the latest Advance Planning Study (APS). There are a total of eight (8) aprons extending along the roadway shoulder at each bridge approach and departure. In addition, upgrading guard rail end treatments to latest standards and installing vegetation control, sign panels with higher reflectivity, and lighting to the latest standards. All work is within the State right of way, including access to Whale Mountain Wash.

DRAFT Determination

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

Caltrans has prepared an Initial Study 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 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, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

In addition, the proposed project would have less-than-significant effects on Aesthetics, GHG Emissions, Hazards and Hazardous Materials, and Transportation.

With the following mitigation measures incorporated, the proposed project would have less-than-significant effects on Biological Resources.

BIO-Waters-1

Habitat enhancement for temporary impacts, which entails exotic and/or invasive plant control immediately following the impact.

BIO-Waters-2

On-site habitat restoration for temporary impacts for native communities through revegetation and reseeding with vegetation native to the impacted area immediately following completion of maintenance activities, or, with written approval from CDFW, at the beginning of the next growing season after project completion.

BIO-Waters-3

Permanent impacts will be mitigated for and decided upon with coordination from regulatory agencies.

BIO-Waters-4

Any additional permanent impacts to jurisdictional areas will be mitigated with appropriate mitigation measures to be identified during the regulatory permitting process.

_____ _____

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

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Chapter 1 Proposed Project

1.1 INTRODUCTION

The California Department of Transportation (Caltrans) proposes to upgrade structures and improve other deficiencies along a 13.2-mile segment of Interstate 40 (I-40) from Post Mile R139.0 to R152.2 in the City of Needles, San Bernardino County. Improvements would include replacing the existing Rock Slope Protection, and partially grouted rock slope protection apron areas at Whale Mountain Wash (Bridge Numbers 54-0668L and 54-0668R) per the latest Advance Planning Study (APS). There are a total of eight (8) aprons extending along the roadway shoulder at each bridge approach and departure. In addition, upgrading guard rail end treatments to latest standards and installing vegetation control, sign panels with higher reflectivity, and lighting to the latest standards. 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).

1.2 PROJECT DESCRIPTION

The Project is located on I-40 from Post Mile R139.0 to R152.2 in the City of Needles, San Bernardino County (see Figures 1-1, Project Vicinity Map and Figure 1-2, Project Location Map). The total length of the project is approximately 13.2 miles.

1.2.1 Project Purpose and Need

Purpose

The purpose of the Project is to preserve the structural integrity and extend the service life of the existing Whale Mountain Wash bridges (Bridge No. 54-0668L/R) and to improve the safety of the traveling public and workers.

Need

The Office of Structure Maintenance and Investigation has identified the existing rock slope protection at Whale Mountain Wash bridges (Bridge No. 54-0668L and 54-0668R) is in poor condition and the bridges are scour critical. Other deficiencies within the Project limits in need of being addressed include collision severity reduction, sign panel replacement and lighting improvements.

1.3 PROJECT ALTERNATIVES

This section describes the proposed Project alternatives developed to meet the purpose and need of the project, while avoiding or minimizing environmental impacts. The alternatives are the No-Build Alternative and the Build Alternative (proposed Project)

1.3.1 No-Build (No-Action) Alternative

The No-Build Alternative would maintain the facility in its current condition. No improvements would be implemented to I-40. As a result, the Whale Mountain bridges would continue to degrade and the deficiencies would not be addressed and be made compliant with current standards, thus reducing safety along I-40 within the project limits. No capital cost is associated with this alternative. This alternative would not meet the Project purpose and need.

1.3.2 Build Alternative

The Build Alternative proposes improving I-40 within the Project limits by replacing the existing Rock Slope Protection, and partially grouted rock slope protection apron areas at Whale Mountain Wash (Bridge Numbers 54-0668L and 54-0668R) per the latest Advance Planning Study (APS). There are a total of eight (8) aprons extending along the roadway shoulder at each bridge approach and departure. In addition, upgrading guard rail end treatments to latest standards and installing vegetation control; 69 sign panels with higher reflectivity; and lighting to the latest standards.

All work (including access to Whale Mountain Wash) would be performed within the State right of way.

This Project contains a number of standardized project measures which are employed on most, if not all, Caltrans projects and were not developed in response to any specific environmental impact resulting from the proposed project. These measures are addressed in more detail in the Environmental Consequences sections found in Chapter 2.

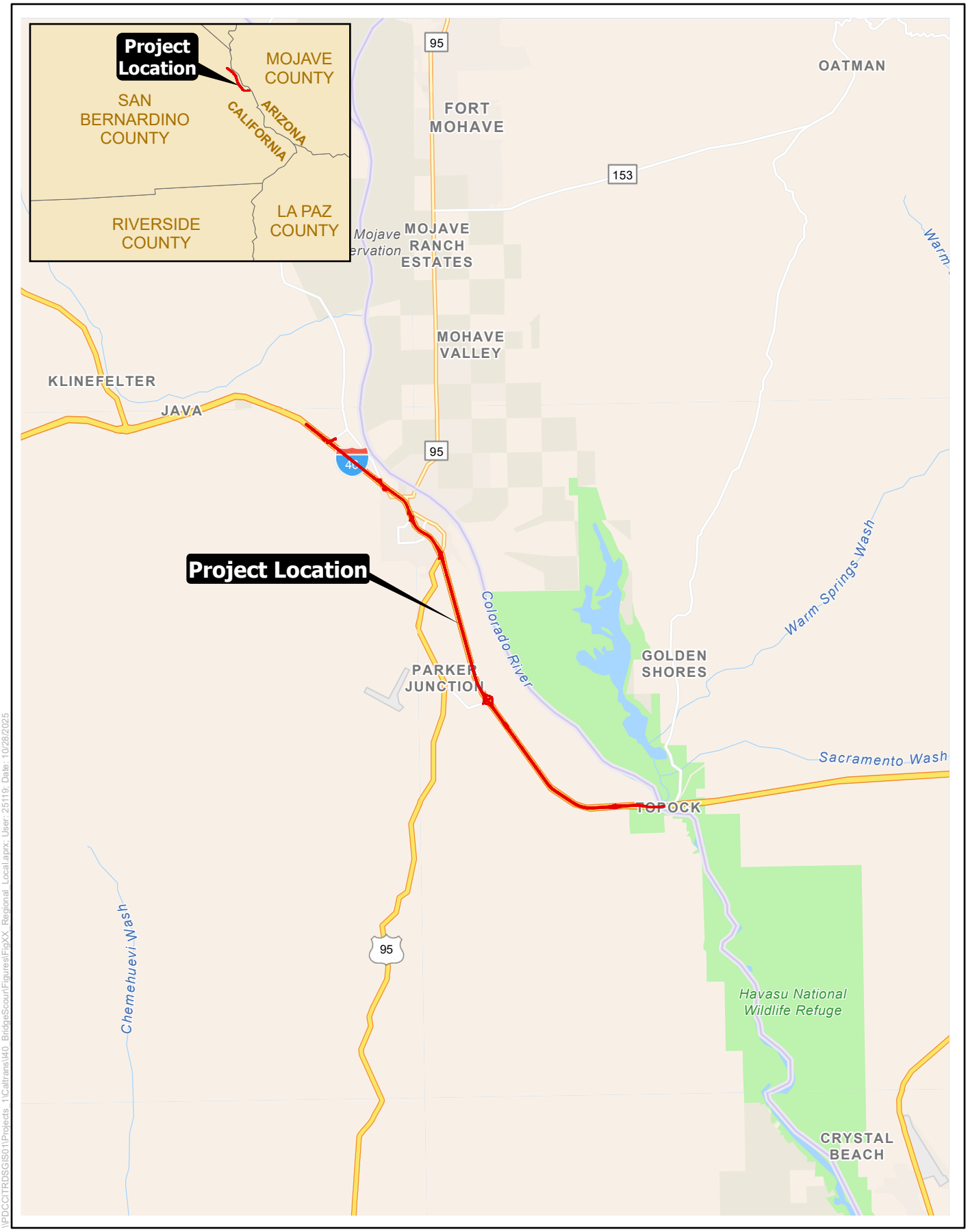
1.4 PERMITS AND APPROVALS NEEDED

The following permits, licenses, agreements, and certifications are required for project construction.

Table 1-1. Permits and Approvals

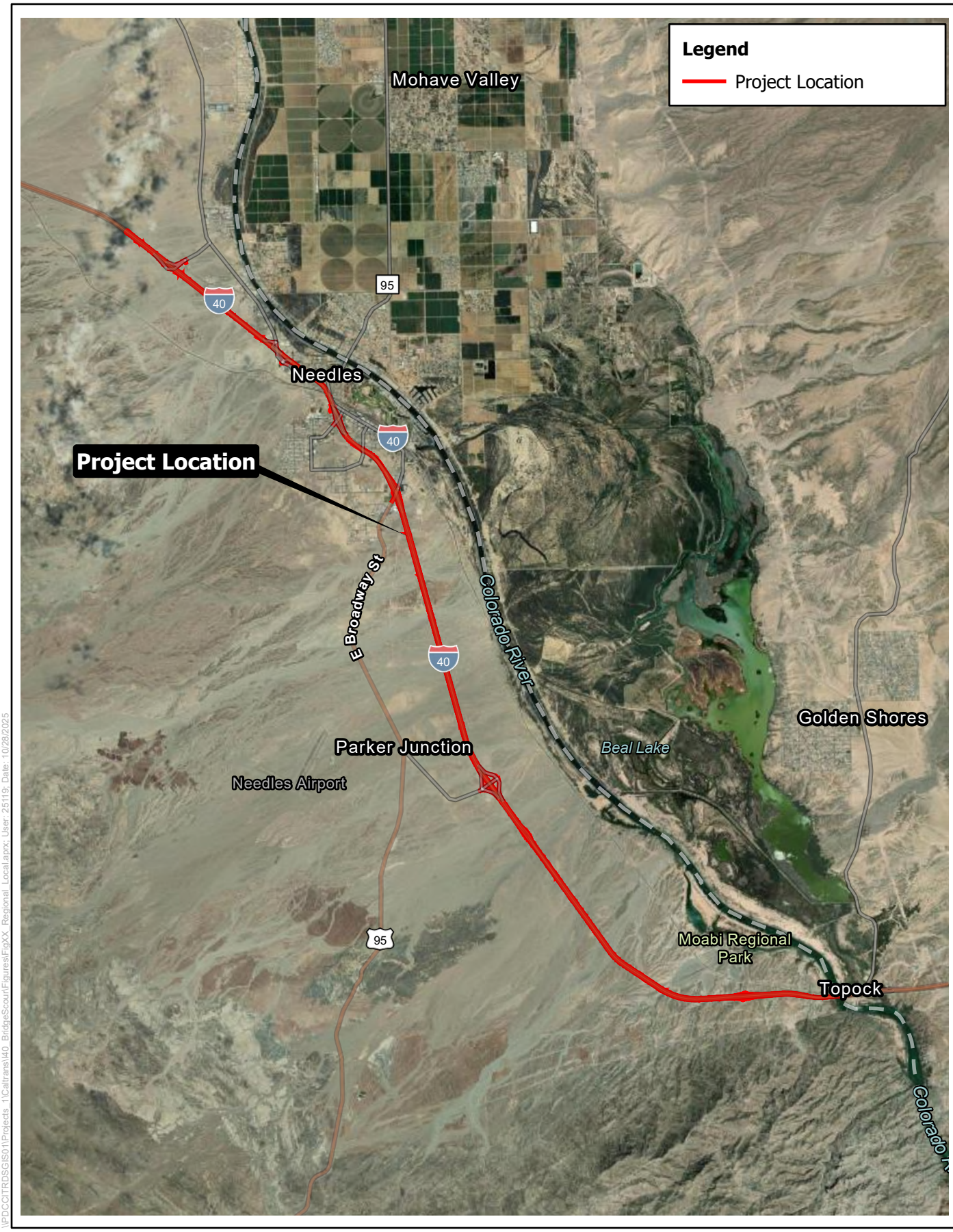
Agency	Permit/Approval	Status
California Department of Fish and Wildlife	California Fish and Game Code 1602 (Lake and Streambed Alteration Agreement).	Caltrans would apply during the Plans, Specifications and Estimates (final design) phase of the Project.
State Water Resources Control Board (SWRCB)	National Pollutant Discharge Elimination System (NPDES) Statewide Stormwater Permit (order No. 2022-0033-DWQ, NPDES No. CAS000003)	Caltrans is responsible for this permit.

Agency	Permit/Approval	Status
Regional Water Quality Control Board (RWQCB)	Waste Discharge Requirement	Caltrans would apply during the Plans, Specifications and Estimates (final design) phase of the Project.



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Figure 1
Regional Vicinity
I-40 Bridge Scour Project



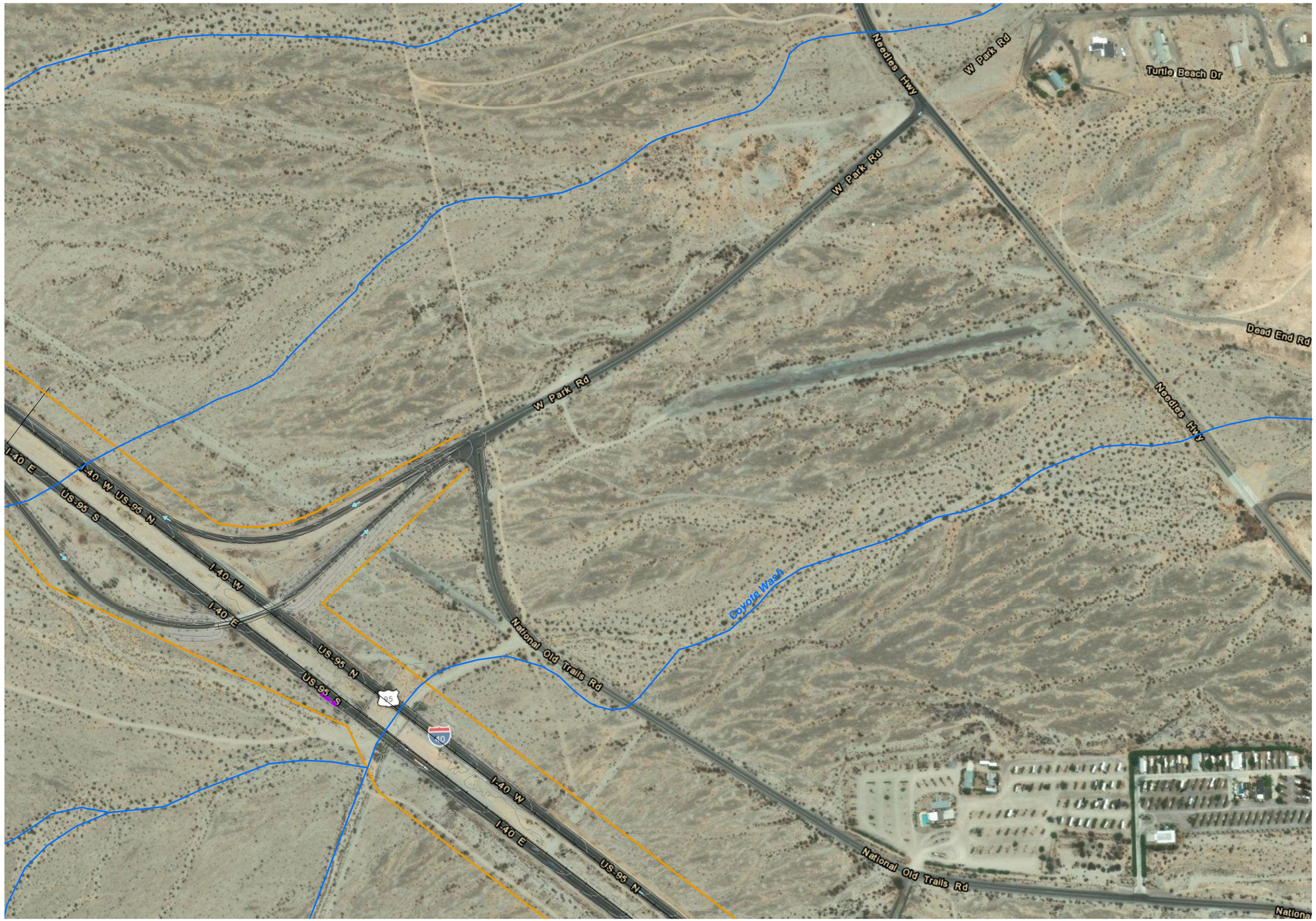
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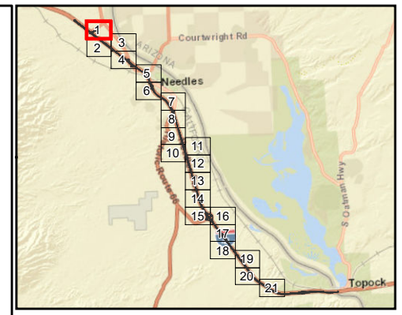
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Figure 2
Local Vicinity
I-40 Bridge Scour Project





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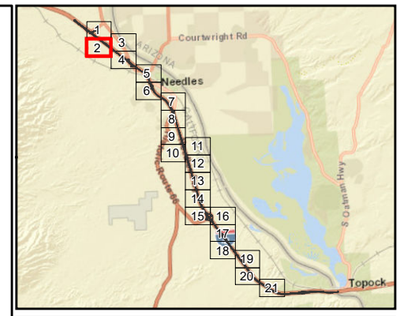
- MGS End Treatment and Vegetation Control
- Existing Roadway
- Existing Right-of-Way

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Figure 3 - Sheet 1 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Roadside Sign Replacement
- MGS End Treatment and Vegetation Control
- Existing Roadway
- Existing Right-of-Way

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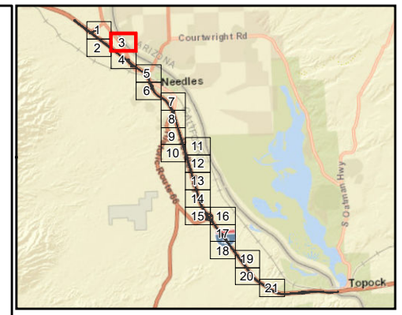
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Figure 3 - Sheet 2 of 21
Project Layout
I-40 Bridge Scour Project

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Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

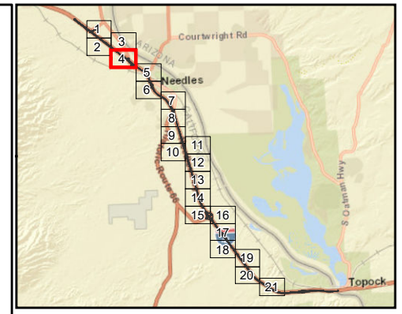
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Figure 3 - Sheet 3 of 21
Project Layout
I-40 Bridge Scour Project





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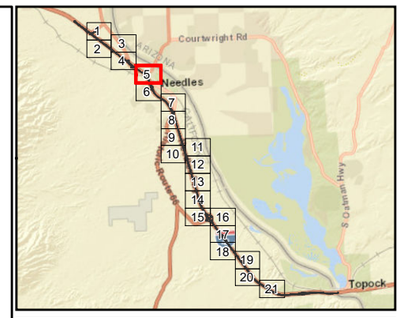
- Lighting Replacement
- Roadside Sign Replacement
- MGS End Treatment and Vegetation Control
- Existing Roadway
- Existing Right-of-Way

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Figure 3 - Sheet 4 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Lighting Replacement
- Roadside Sign Replacement
- Bridge Soffit Lighting Replacement
- MGS End Treatment and Vegetation Control
- Existing Roadway
- Existing Right-of-Way

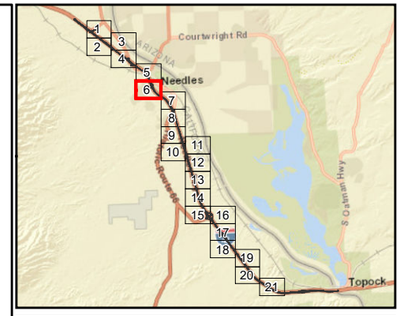
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Figure 3 - Sheet 5 of 21
Project Layout
I-40 Bridge Scour Project

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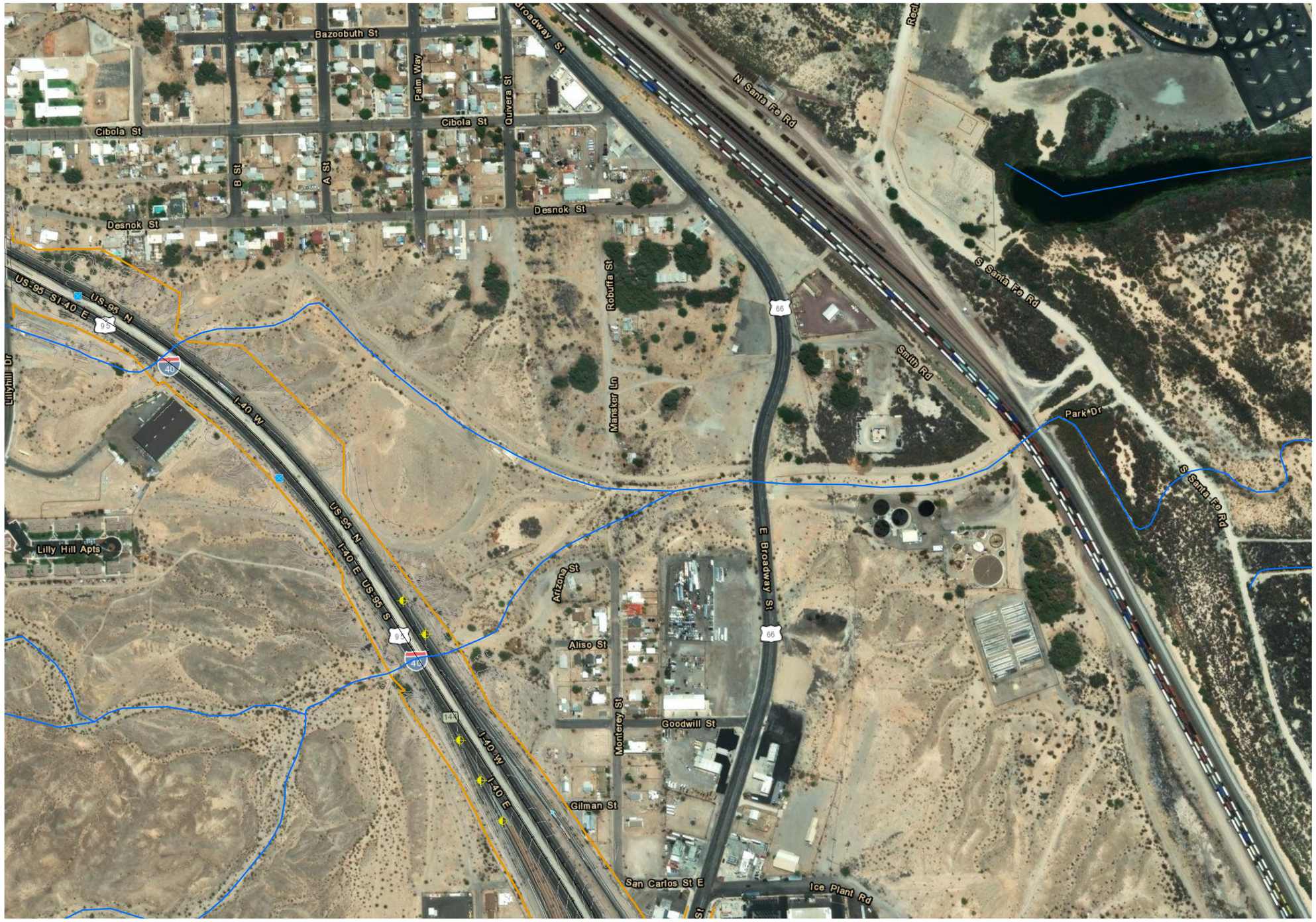
- Lighting Replacement
- Roadside Sign Replacement
- Bridge Soffit Lighting Replacement
- Existing Roadway
- Existing Right-of-Way

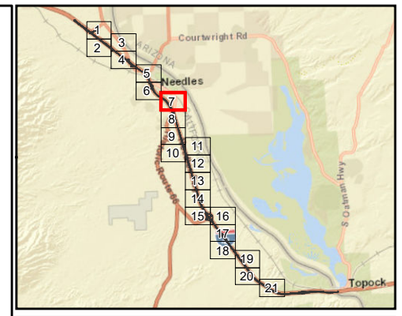
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Figure 3 - Sheet 6 of 21
Project Layout
I-40 Bridge Scour Project





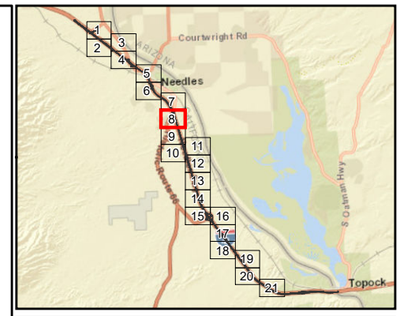
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- Lighting Replacement
- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

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Figure 3 - Sheet 7 of 21
Project Layout
I-40 Bridge Scour Project





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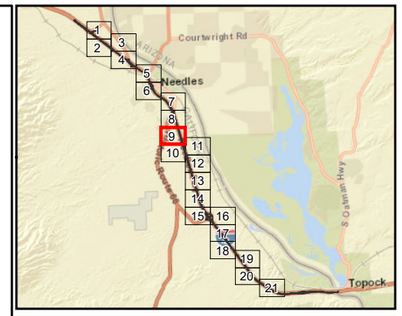
- Lighting Replacement
- Roadside Sign Replacement
- Bridge Soffit Lighting Replacement
- Maintenance Vehicle Turnout
- Existing Roadway
- Existing Right-of-Way

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Figure 3 - Sheet 8 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

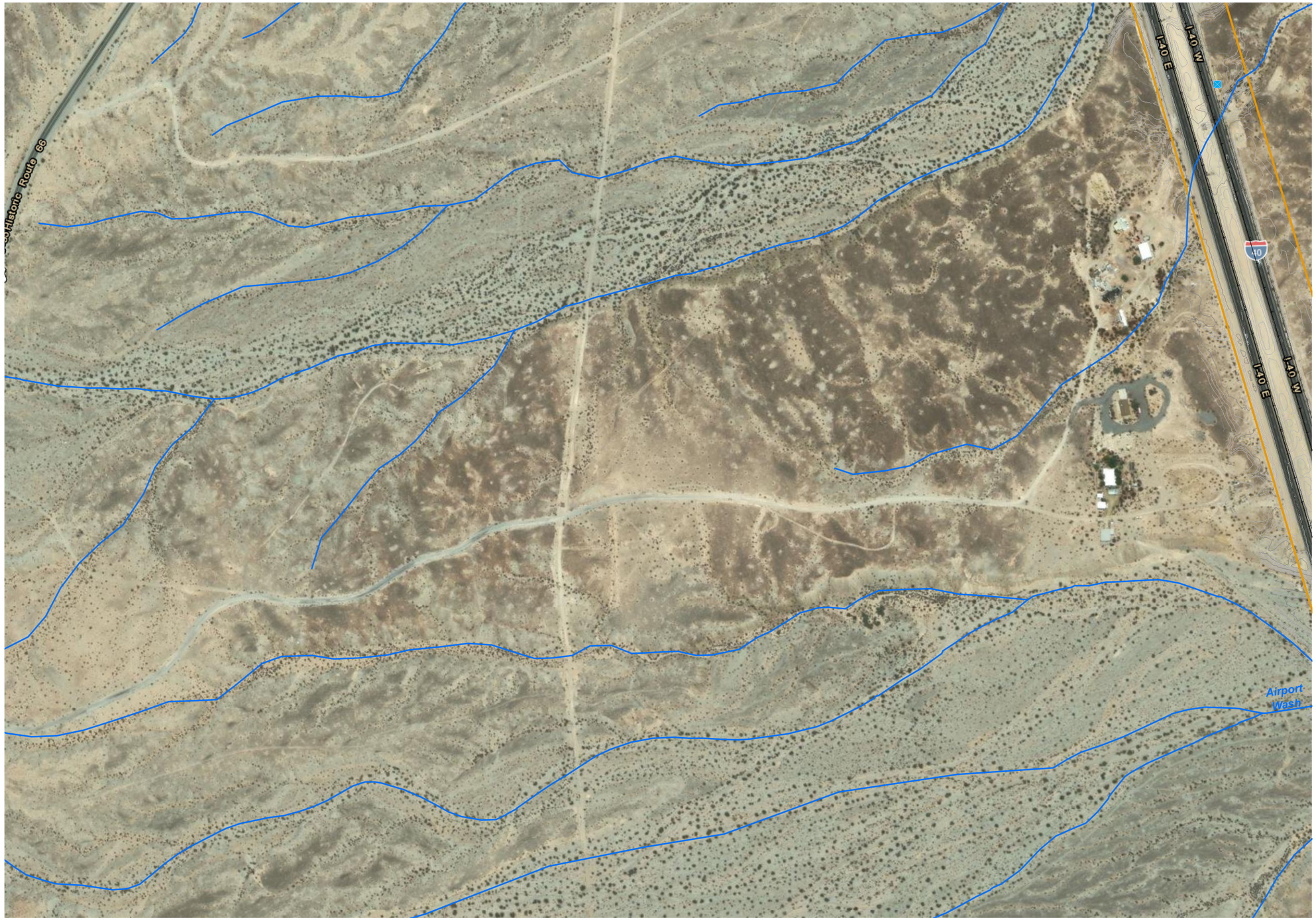
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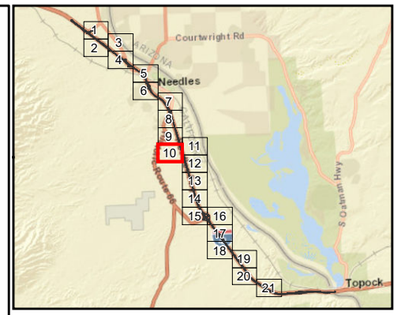
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Figure 3 - Sheet 9 of 21
Project Layout
I-40 Bridge Scour Project

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- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

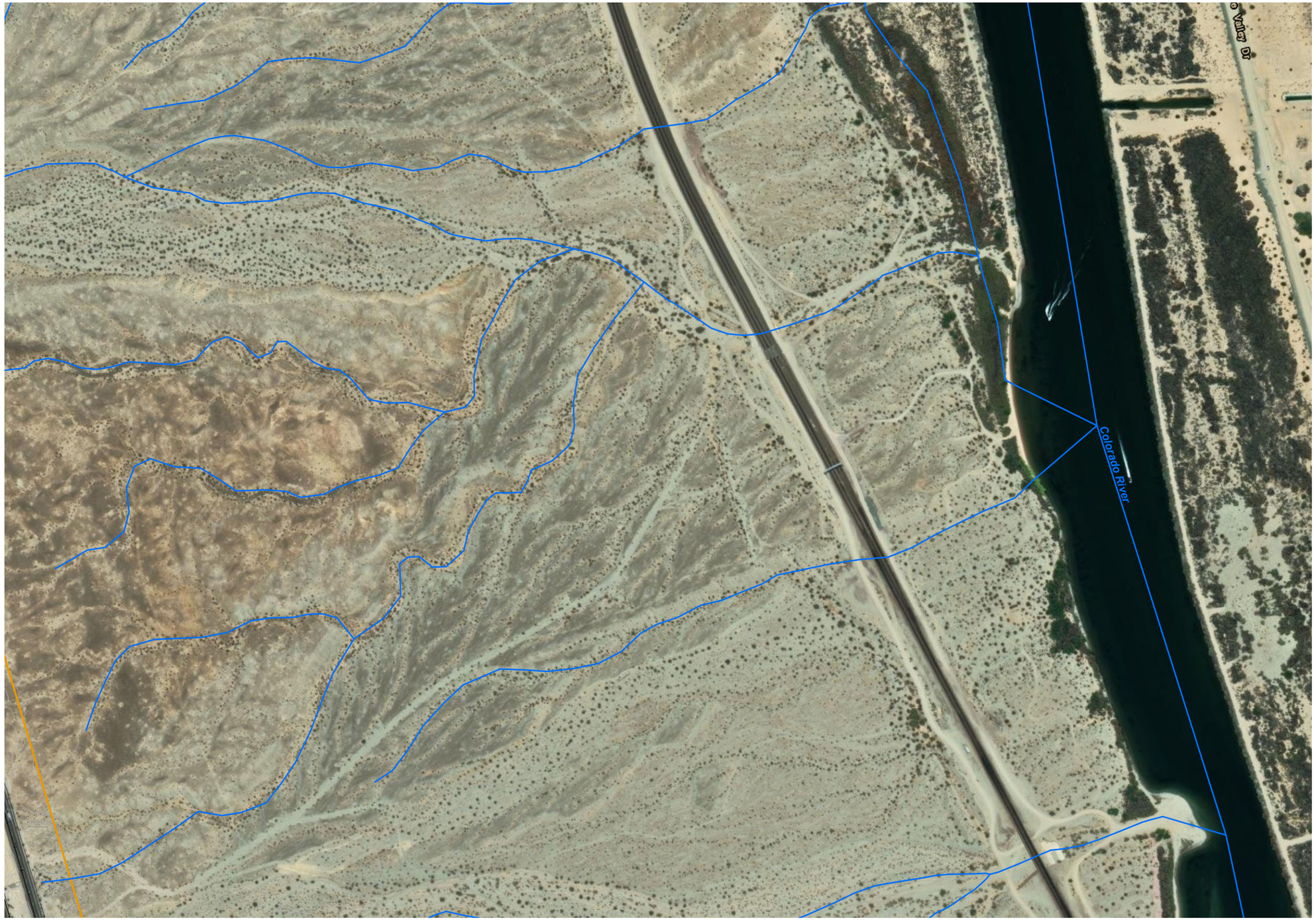
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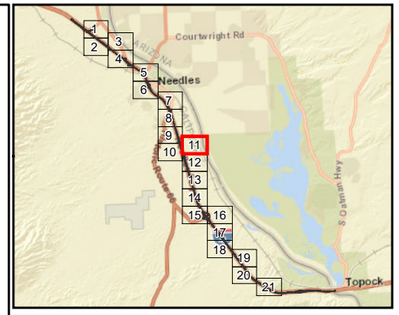
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Figure 3 - Sheet 10 of 21
Project Layout
I-40 Bridge Scour Project

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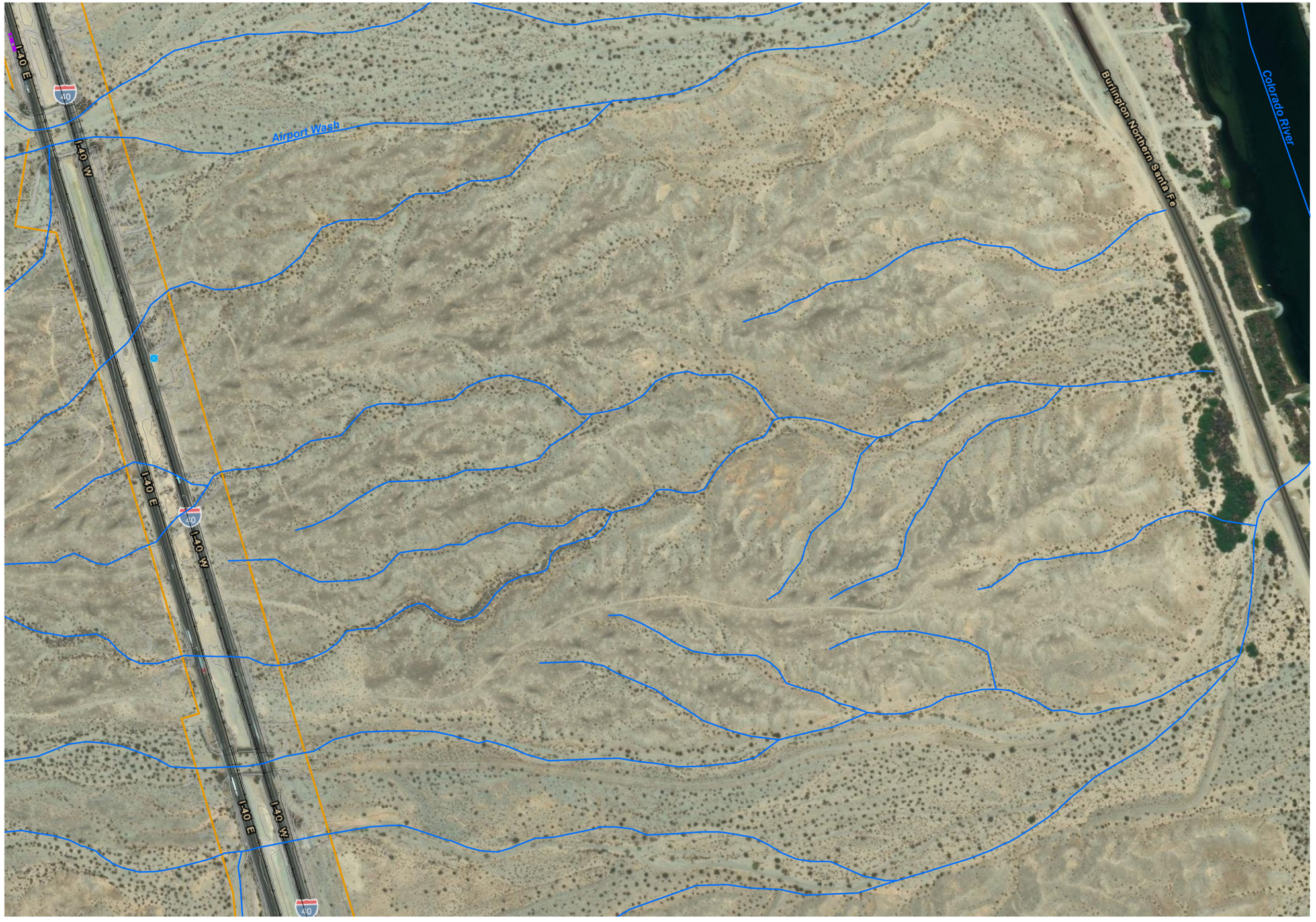
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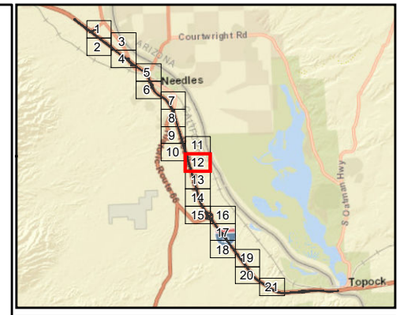
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- Existing Right-of-Way

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Figure 3 - Sheet 11 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Roadside Sign Replacement
- MGS End Treatment and Vegetation Control
- Existing Roadway
- Existing Right-of-Way

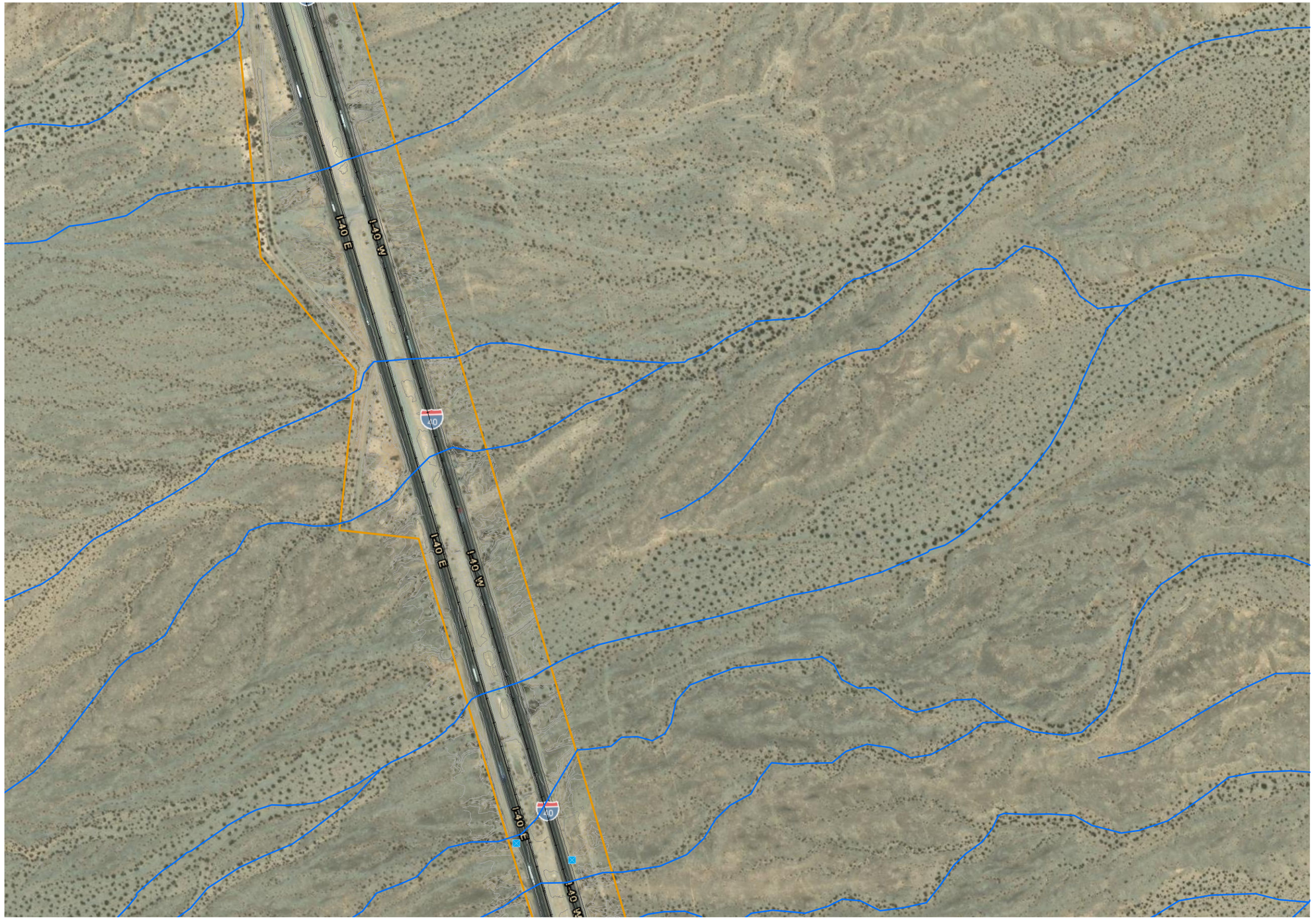
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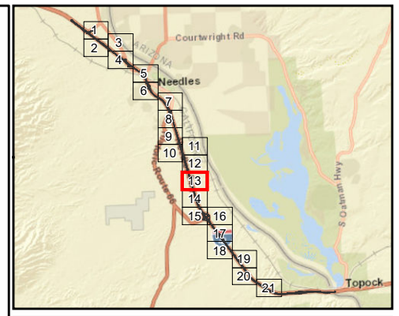
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Figure 3 - Sheet 12 of 21
Project Layout
I-40 Bridge Scour Project

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Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

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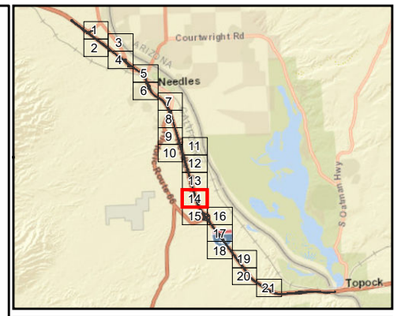
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Figure 3 - Sheet 13 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

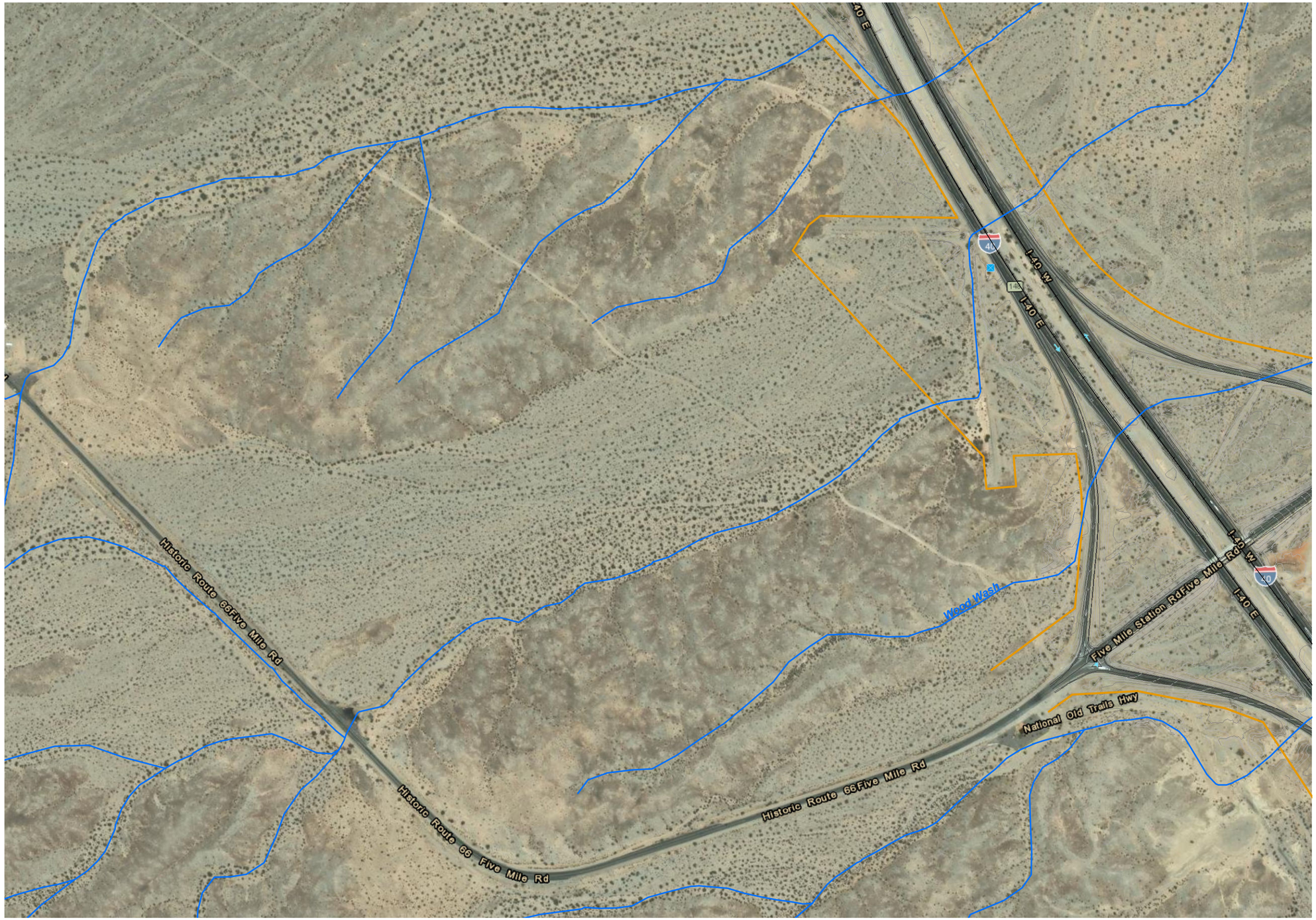
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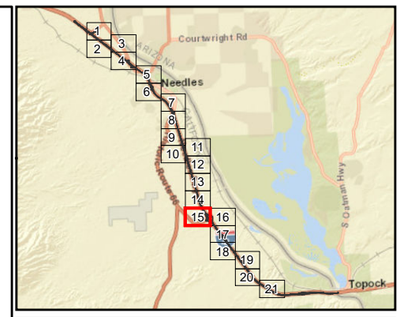
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Figure 3 - Sheet 14 of 21
Project Layout
I-40 Bridge Scour Project

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Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

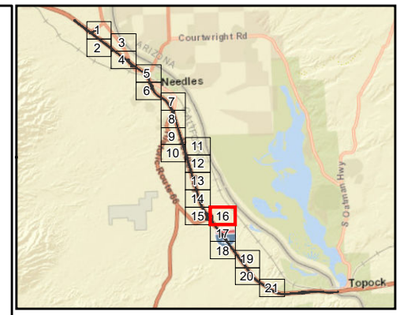
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Figure 3 - Sheet 15 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

N

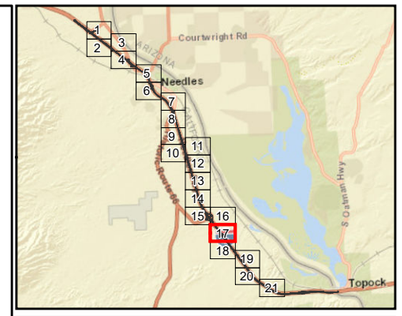
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Figure 3 - Sheet 16 of 21
Project Layout
I-40 Bridge Scour Project

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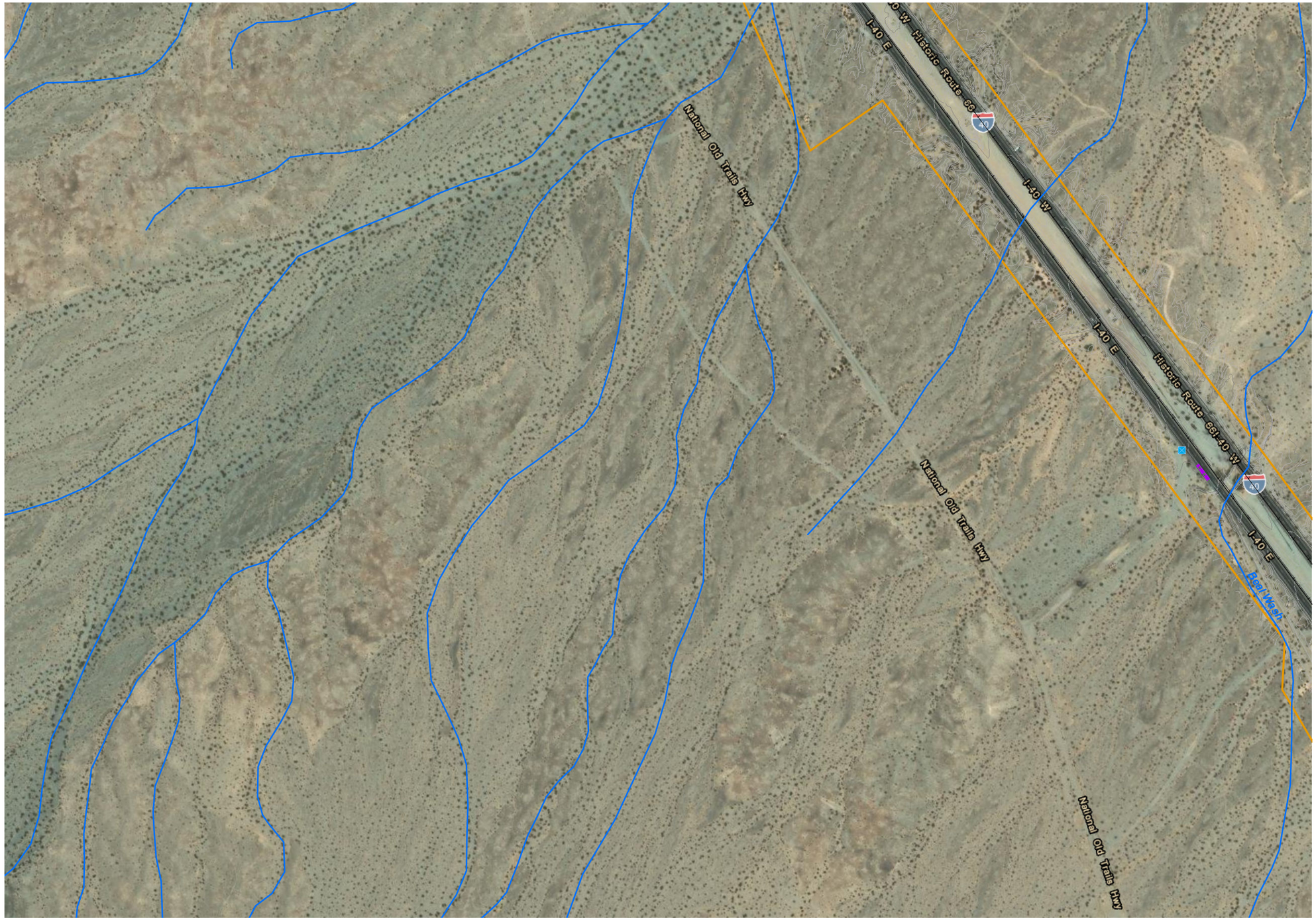
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- Existing Roadway
- Existing Right-of-Way

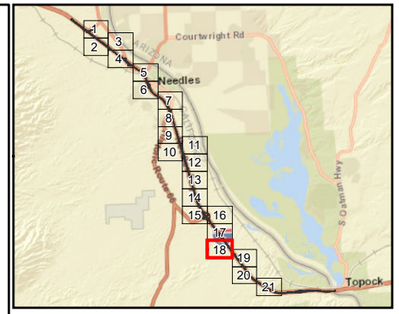
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Figure 3 - Sheet 17 of 21
Project Layout
I-40 Bridge Scour Project

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Legend

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- MGS End Treatment and Vegetation Control
- Existing Roadway
- Existing Right-of-Way

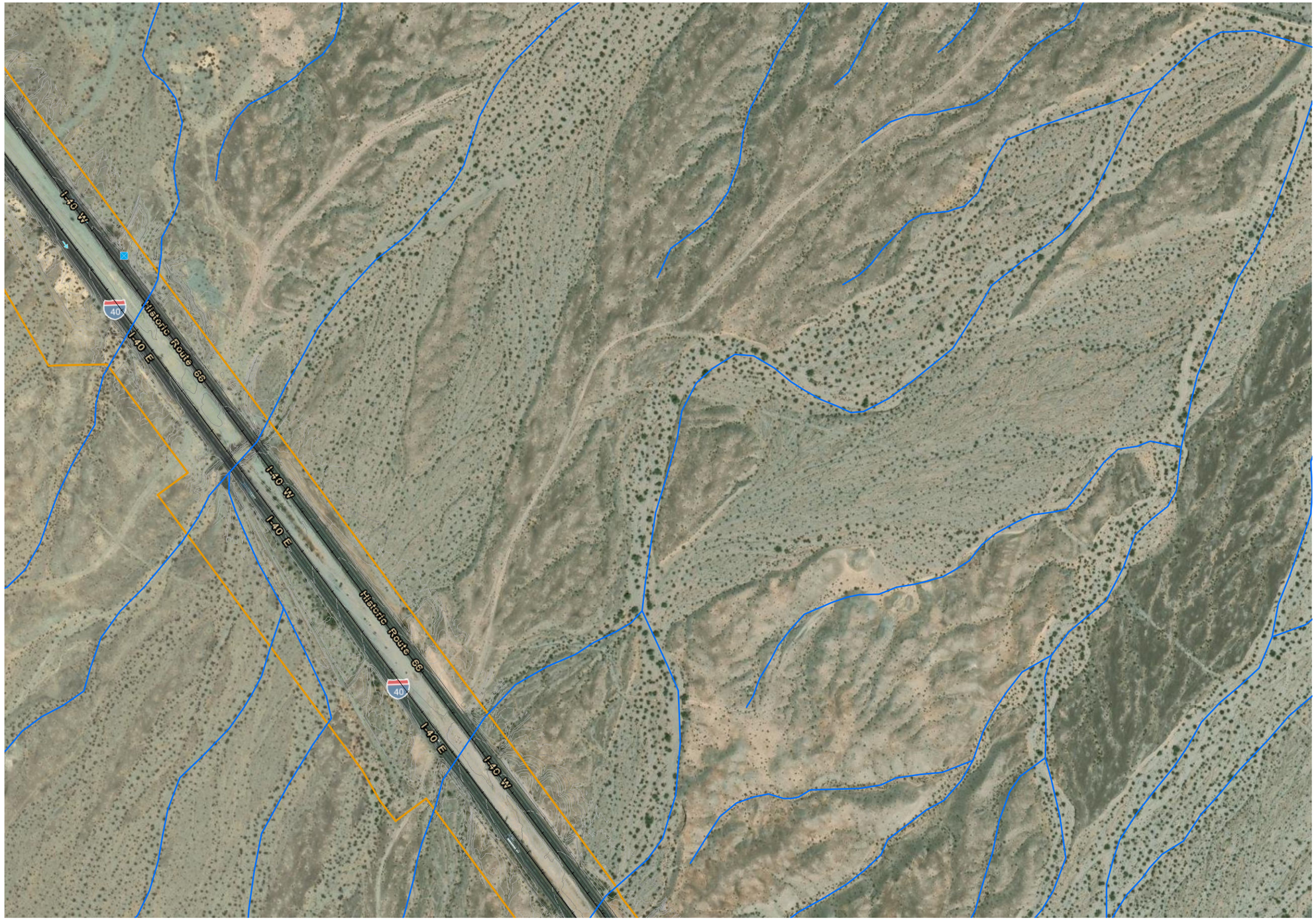
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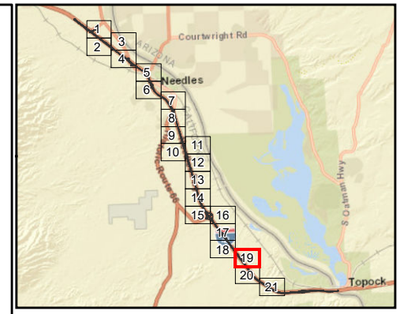
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Figure 3 - Sheet 18 of 21
Project Layout
I-40 Bridge Scour Project

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Legend

- Roadside Sign Replacement
- Existing Roadway
- Existing Right-of-Way

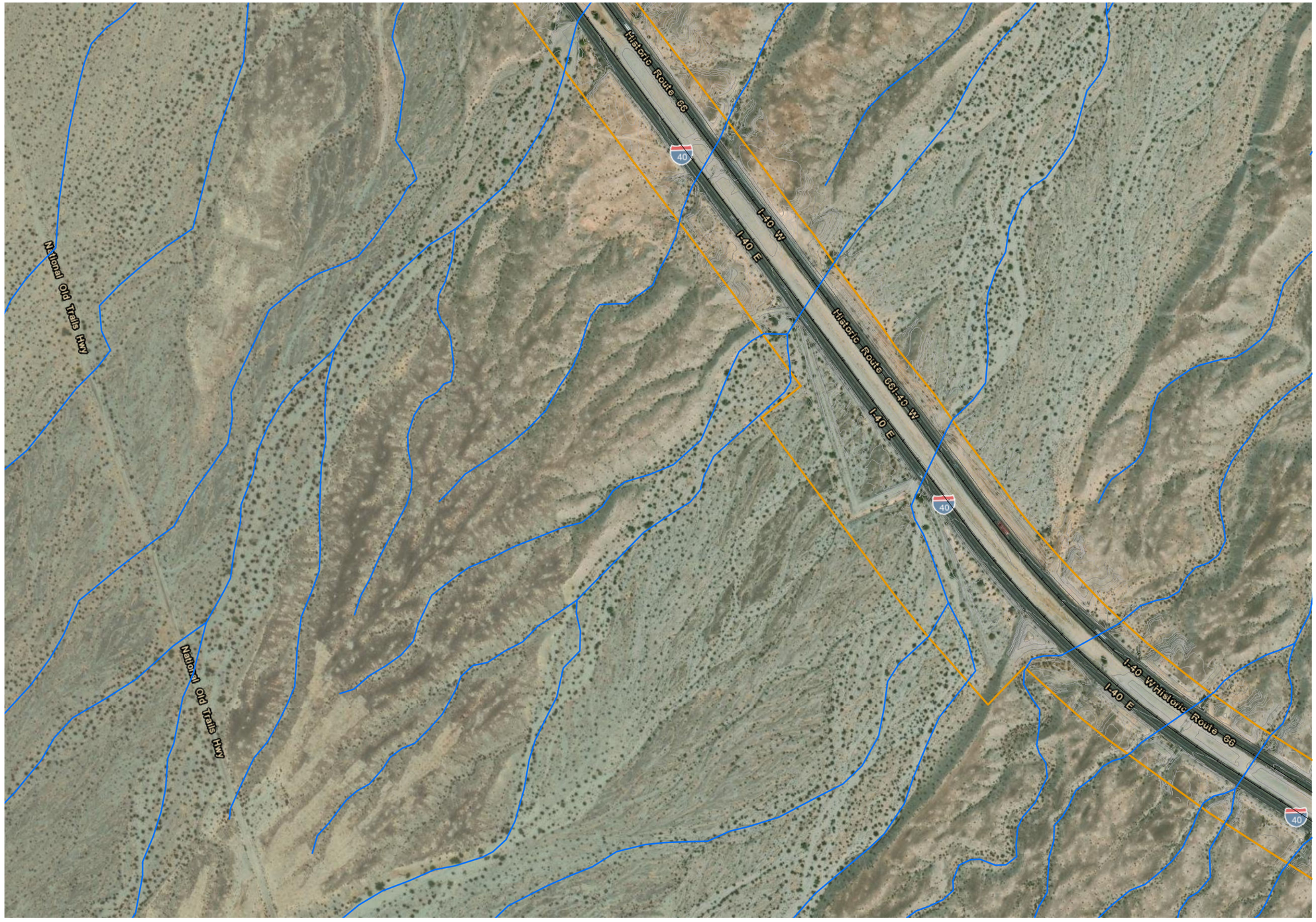
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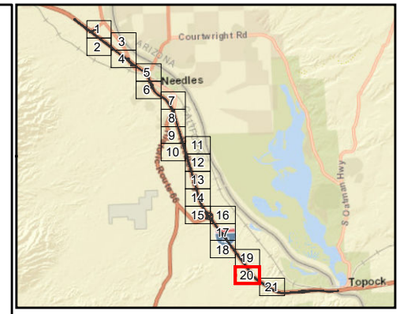
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Figure 3 - Sheet 19 of 21
Project Layout
I-40 Bridge Scour Project

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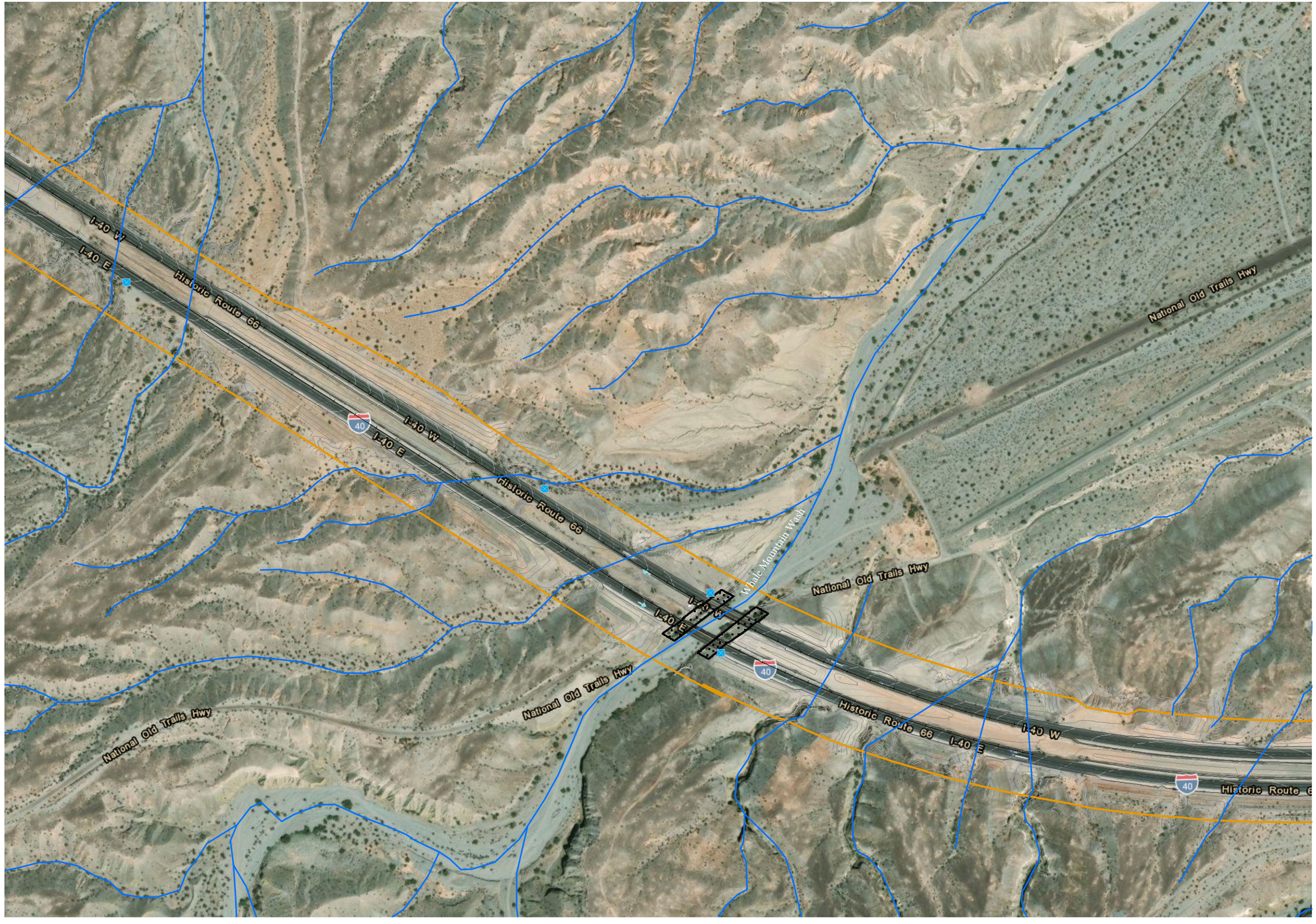
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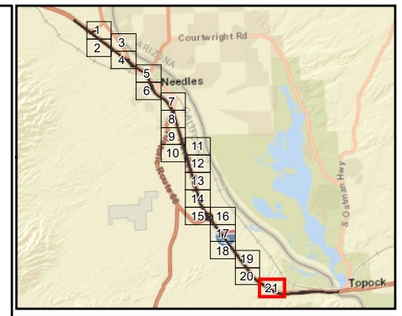
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- Existing Right-of-Way

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Figure 3 - Sheet 20 of 21
Project Layout
I-40 Bridge Scour Project





Legend

- Roadside Sign Replacement
- Rock Slope Protection
- Existing Roadway
- Existing Right-of-Way

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Figure 3 - Sheet 21 of 21
Project Layout
I-40 Bridge Scour Project

Chapter 2 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 National Environmental Policy Act (NEPA), impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

The Project features can include both design elements of the projects and standardized measures that are applied to all or most Caltrans projects. These features include Best Management Practices (BMPs), and measures included in the Standard Special Provisions (SSPs); see Chapters 1 and this chapter for a detailed discussion of these features. The annotations to this checklist are summaries of information contained here 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 details that follow. This checklist incorporates by reference the information contained in Chapters 1 as well as this chapter.

2.1.1 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?	Less Than Significant Impact

2.1.1.1 CEQA Significance Determinations for Aesthetics

a), b), and c): No Impact. A Landscape Architecture Scoping Questionnaire to Determine Visual Impact Assessment Level (Caltrans 2025a) was prepared for the Project. According to the Caltrans State Scenic Highway Map, I-40 within the Project

area is designated as an “Eligible” State Scenic Highway. The Project proposes to replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, upgrade sign panels with higher reflectivity, and upgrade lighting to the latest standards, and is not anticipated to result in visual impacts. The Project is anticipated to be moderately compatible with the visual character of the existing landscape, would have low adverse contrast with the existing surroundings, and no visual sensitivity from potential viewer groups. There are also no identifiable scenic resources within the Project area. The Landscape Architecture Scoping Questionnaire to Determine Visual Impact Assessment Level was scored an 18, with negligible visual changes to the environment and no additional visual technical studies required. As such, impacts to aesthetics are not anticipated to occur with implementation of the Project.

d): Less Than Significant Impact. According to the Scoping Questionnaire, the Project has low potential for adverse effects from lighting and glare.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.2 Agriculture and Forestry Resources

In determining whether impacts on 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 Department 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

Question	CEQA Determination
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

2.1.2.1 CEQA Significance Determinations for Agriculture and Forestry Resources

a), b): 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 area. No parcels within the project area are under a Williamson Act contract and would not conflict with agricultural use zoning (Department of Conservation, 2025).

c), d): No Impact. The Project is located in the desert. No timberland production areas adjacent to or within the proposed Project area. The proposed Project is not expected to conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production or result in the loss or conversion of forest lands.

e): No Impact. The proposed project would not involve other changes that would result in the conversion of farmland into non-agricultural uses or forest land into non-forest use. There are no other changes anticipated to farmland or forest land.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.3 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

2.1.3.1 CEQA Significance Determinations for Air Quality

a), b), and c): No Impact

The proposed project is located in the Mojave Desert Air Basin (Basin) which is within the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). As of 2025, the Basin is classified as severe-15 nonattainment area of the federal 8-hour ozone (O_3) standard and a moderate nonattainment area for the federal particulate matter 10 micrometers or less in diameter (PM10) standard. The project region is also classified as a nonattainment area for state 8-hour O_3, particulate matter 2.5 micrometers or less in diameter (PM2.5), and PM10 standards.

The proposed project is not anticipated to conflict with or obstruct with air quality plans because it would not increase capacity or result in the addition of traffic lanes that would result in long-term air quality impacts. None of the Project improvements are expected to conflict with air quality plans.

An Air Quality Review Memorandum was prepared on July 10, 2025 for the proposed project (Caltrans, 2025b). The scope of the project was evaluated and determined to exempt under projects listed under Table 1 of the Caltrans Carbon Monoxide Protocol or Table 2 of 40 Code of Federal Regulations (CFR) 93.126. All projects listed under Table 1 or Table 2 are exempt from all emissions analysis and therefore, do not require an air quality study and no impacts are anticipated.

During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by hauling, and other construction-related activities. The emissions expected include CO, sulfur dioxide (SO_2), nitrogen oxides (No_x), volatile organic compounds (VOCs), directly emitted PM_{10}, $PM_{2.5}$, and air toxic contaminants (such as diesel exhaust particulate matter).

These emissions would be temporary, lasting only during construction and limited to the immediate area surrounding the construction site. Furthermore, Caltrans 2024 Standard Specifications (or most recent) require all projects to comply with applicable air pollution control rules, regulations, ordinances, and statutes.

d): No Impact

Some phases of construction are expected to result in short-term odors in the immediate paving site. Such odors are anticipated to be quickly dispersed below detectable thresholds as distance from the site increases. Operation of the proposed project is not anticipated to result in objectionable odors; therefore, no long-term impacts would occur.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.4 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 Impact
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?	Less Than Significant with Mitigation Incorporated
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 with Mitigation Incorporated
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

2.1.4.1 CEQA Significance Determinations for Biological Resources

The information from this section is based on the Natural Environment Study (Minimal Impacts)[NES(MI)] (Caltrans 2025c) prepared for the Project. Database records were reviewed for records of special-status species, jurisdictional waters, and sensitive natural communities that have the potential to occur in the Biological Study Area (BSA) and vicinity. The BSA included all areas that could potentially be impacted by the Project plus a 500-foot buffer. The Project Impact Area (PIA) includes the project footprint of the rock slope protection (RSP) at the Whale Mountain Wash bridges, PM R152.1 to R152.2, bridge work locations, guard rail end treatment locations, vegetation control locations, and sign panel locations throughout the Project limits, and including a buffer to allow for construction machinery and workspace. Field reviews, habitat assessments, and special status species survey were also conducted on the Project site.

a): Less Than Significant Impact

Special-Status Plant Species

Based on literature reviews, site characteristics, and the biological survey conducted for the Project, it was determined that several Federal or State-listed plant species have the potential to occur within the BSA. The species are listed below:

- Lonesome agave (*Agave simplex*);
- Kofa Mountain barberry (*Berberis harrisoniana*);
- Spiny-hair blazing star (*Mentzelia tricuspis*).

The Project anticipates “No Impact” on lonesome agave and Kofa Mountain barberry due to a lack of suitable habitat within the PIA and due to a lack of recent species presence within the BSA as determined during the habitat assessments, special status species survey, and species occurrence database reviews. There is also expected to be “No Impact” on spiny-hair blazing star due to the lack of recent species presence within the BSA as determined from occurrence data and from survey results obtained during the habitat assessment and special-status species survey. The Project will not result in any State species of special concern or Bureau of Land Management (BLM) sensitive plant species trending toward a State-listed status, due to lack of suitable habitat and/or lack of species being present. Potential impacts to spiny-hair blazing star and other rare plant species will be avoided or minimized with implementation of avoidance and minimization measures **BIO-General-1, BIO-General-8, BIO-General-Project Specific Measure(PSM)-2, and BIO-Plant-2.**

Special Status Invertebrate Species

- Crotch’s bumble bee (*Bombus crotchii*);
- Monarch butterfly (*Danaus Plexippus*).

The PIA contains seasonally suitable habitat for special-status invertebrate species monarch butterfly and Crotch’s bumblebee. There are recent observations of milkweed, the monarch’s larval host plant, within the BSA. In addition, one monarch individual was observed in the BSA during habitat assessment. The Project will implement avoidance and minimization measures (**BIO-General-4a, BIO-General-7, BIO-Arthropod-1**) to avoid or minimize any impacts to monarch butterfly. With the implementation of the avoidance and minimization measures, the Project will have “No Effect” on monarch butterfly. Furthermore, there have been no observations of Crotch’s bumble bee in the BSA. As such, a “No Take” of Crotch’s bumble bee is anticipated due to lack of presence.

Special Status Reptiles

- Desert Tortoise (*Gopherus agassizii*);
- Gila monster (*Heloderma suspectum*).

There is suitable habitat for Federally-listed as Threatened desert tortoise within portions of the PIA in Whale Mountain Wash. The Project has the potential to directly impact this terrestrial reptile species by crushing or other direct injury from construction equipment, vehicles, or personnel. Additionally, temporary indirect impacts to this species may include disturbance related to increased noise, light, vibration, and dust generation. Due to the prevalence of creosote bush scrub in the Project area and historical occurrences of desert tortoise in the Project area, the species is assumed to have a moderate probability of occurrence within the PIA, particularly in the Whale Mountain Wash, where drainage work would occur in the form of rock slope protection. The following avoidance and minimization measures will be implemented: **BIO-General-1, BIO-General-4b, BIO-General-6, BIO-General-7, BIO-General-8, BIO-General-9, BIO-General-10, BIO-General-11, BIO-General-12, BIO-General-PSM-1, BIO-Reptile-1, BIO-Reptile-2, BIO-Reptile-3, BIO-Reptile-4, BIO-Reptile-5**. With implementation of these avoidance and minimization measures, the Project does not anticipate impacts to desert tortoise. Under the California Endangered Species Act (CESA), the Project will not result in "Take" of State-listed as Threatened desert tortoise.

There are no recorded observations of Gila Monster within the BSA and habitat assessment and special-status surveys did not identify any individuals or their signs in the BSA. The species is therefore considered absent from the PIA and BSA, and no impacts are anticipated to Gila Monster.

Special Status Birds

- Bendire's thrasher (*Toxostoma bendirei*);
- Burrowing owl (*Athene cunicularia*);
- Crissal thrasher (*Toxostoma crissale*);
- Mountain plover (*Charadrium montanus*);
- Summer tanager (*piranga rubra*);
- Vermillion flycatcher (*Pyrocephalus rubinus*).

Based on the surveys and research conducted on reported species occurrences, special status bird species burrowing owl, Crissal thrasher, and summer tanager, as well as migratory birds have the potential to occur within the BSA and PIA. These species have the potential to nest in trees and other vegetation and bridges within the BSA, particularly in Whale Mountain Wash. Direct impacts could occur as a result of Project activities. The Project may also result in temporary indirect impacts to suitable habitat due to Project activities, increased human and vehicular activity during construction. Indirect impacts caused by noise, dust, and lighting could also potentially occur and could deter individuals from typical flight or movements. In order to reduce potential impacts to special status and migratory bird species, the Project will implement avian migratory and nesting bird avoidance and minimization measures (**BIO-General-1, BIO-General-7, BIO-General-8, BIO-Avian-1, BIO-Avian-2**). With implementation of these measures, there will be "No Take" and "No Impact" to burrowing owl, Crissal thrasher, and summer tanager. There will also be no impacts to Bendire's thrasher, mountain plover, and vermillion flycatcher based on the very low probability of their

occurrence within the BSA. There will be “No Take” and “No Effect” to any State and Federally-listed migratory bird species that may be present within the PIA with implementation of measures. The Project will not cause other special-status bird species to trend towards becoming State or Federally listed.

Special Status Mammals

- California leaf-nosed bat (*Macrotus californicus*);
- Desert bighorn sheep (*Ovis canadesnsi nelsoni*);
- Pallid bat (*Antrozous pallidus*);
- Yuma myotis (*Myotis yumanensis*).

Direct impacts from Project activities may occur to special-status bat species including impacts resulting from harassment or direct injury from construction equipment, vehicles, or personnel. Indirect impacts to bats may occur from Project activities, lighting, noise, and vibrations that may cause roost abandonment, potentially resulting in mortality of flightless immature bats. Project activities conducted outside of the maternity season that cause bats to leave a roost during daytime hours pose a mortality risk. Appropriate avoidance and minimization measures (**BIO-General-1, BIO-General-4b, BIO-General-7, BIO-General-8, BIO-General-9, BIO-General-10, BIO-General-11, BIO-Bat-1-PSM-12, BIO-Bat-2-PSM-13**) will be implemented to avoid or minimize possible impacts to these species at the Whale Mountain Wash bridges. These measures will result in “No Take” of these species, and they will not trend towards State or Federal listing status as a result of Project activities.

b): Less Than Significant With Mitigation Incorporated

Based on the NES(MI) prepared for the Project, there are two distinct vegetation communities within the BSA: Creosote Bush Scrub and Mojave Desert Wash Scrub. The rock slope protection and associated construction activities at Whale Mountain Wash are expected to result in permanent impacts to the Creosote Bush Scrub and Mojave Desert Wash Scrub communities. Temporary direct impacts to the Creosote Bush Scrub and Mojave Desert Wash Scrub communities are also expected to occur at PM 152.1/152.2. To avoid and minimize these potential impacts, the Project will implement avoidance, minimization, and mitigation measures (**BIO-General-1, BIO-General-9, BIO-General-10, BIO-General-11, BIO-Natural Community-PSM-1, BIO-Waters-2, BIO-Waters-3,** and **BIO-Waters-4**).

c): Less Than Significant With Mitigation Incorporated

Whale Mountain Wash is potentially jurisdictional and may be impacted by the Project as a result of rock slope protection and associated construction activities. The other minor drainages found within the Project area will not be impacted by the Project. The Jurisdictional Delineation (JD) prepared for Whale Mountain Wash determined that a wetland delineation would not be required, as no hydrophytic vegetation or hydric soils are present within the jurisdictional delineation study area. The NES(MI) concluded that no waters potentially regulated under the U.S. Army Corps of Engineers (USACE) are

present within the jurisdictional delineation study area, therefore, no Section 404 or Section 401 permitting is anticipated. The reach of Whale Mountain Wash within the jurisdictional delineation study area would however be regulated by the Regional Water Quality Control Board (RWQCB) and CDFW. In total, approximately 1.41 acres of non-wetland waters fall under RWQCB jurisdiction; therefore a RWQCB Waste Discharge Requirement (WDR) permit will be required. Approximately 1.82 acres of CDFW streambed occurs within the jurisdictional delineation study area and a Section 1602 Lake and Streambed Alteration Agreement permit will be required. There will be both permanent and temporary impacts to Waters of the State as a result of the rock slope protection installation for the Project, utilization of construction access points, staging and temporary access ways. The impacts to Waters of the State will be determined during the PS&E phase of the Project. These impacts will require mitigation to comply with the CDFW "no net loss" policy. Waters of the U.S. are not expected to be impacted by the Project. Anticipated mitigation requirements include permanent protection and restoration of compensatory habitat within the watershed associated with the Project area. Compensatory mitigation measures (**BIO-Waters-1, BIO-Waters-2, BIO-Waters-3, and BIO-Waters-4**) will be required for the Project.

d): No Impact

The Project is located within the Mojave Desert Ecoregion and the Piute Valley-Sacramento Mountains subregion. The Project is located in CDFW Areas of Conservation Emphasis (ACE) dataset Rank 2 (large natural habitat areas), Rank 3 (connections with implementation flexibility), and Rank 4 (conservation planning linkages). The Project is not within any Essential Connectivity Area. The function and connectivity of the Mojave Desert Ecoregion and the Piute Valley-Sacramento Mountains Subregion, including linkages within Connectivity Ranks 2, 3, and 4 will not be affected by the Project within implementation of standard Caltrans best management practices (BMPs) . The project will have no impact on habitat connectivity within the Project area and surrounding BSA.

e): No Impact

The Project is not expected to conflict with any local policies or ordinances protecting biological resources.

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.

Avoidance, Minimization, and/or Mitigation Measures

BIO-General-1 Equipment Staging, Storing & Borrow Sites

Caltrans will confine all equipment maintenance, storage, and parking during construction activities to the designated construction area or to previously disturbed

graded or paved areas, or level areas where grading and vegetation clearing are not required and that are not habitat for listed species, as determined in coordination with the Approved Biologist (**BIO-General 8**). All staging areas would be located at least 150 feet from sensitive habitat areas, including streams/drainages and other aquatic habitat, since storage will include fuels, lubricants, and solvents.

BIO-General-4a Preconstruction Invertebrate Species Survey

A preconstruction monarch butterfly survey must be conducted by a contractor-supplied biologist no more than 1 week prior to project activities within the Biological Study Area. If a monarch butterfly, butterfly larva, or chrysalis is located, the Resident Engineer and Caltrans biologist must be contacted and additional measures and/or agency coordination may be required.

BIO-General-4b Pre-construction Desert Tortoise Surveys

Pre-construction surveys for desert tortoise must be conducted by a qualified contractor-supplied biologist within the Project Impact Area and any staging areas within 7 days prior to project activities and following a habitat suitability assessment. If one of the species listed above or other special status species is located, the Resident Engineer and Caltrans biologist must be contacted and additional measures and/or agency coordination may be required.

BIO-General-4c Preconstruction Desert Bighorn Sheep Surveys

A preconstruction desert bighorn sheep survey consistent with CDFW, USFWS, and BLM guidelines must be conducted by a qualified contractor-supplied biologist no more than 3 days prior to project activities within Whale Mountain Wash and following a habitat assessment. If a desert bighorn sheep individual or sign is located, the Resident Engineer and Caltrans biologist must be contacted and additional measures and/or agency coordination may be required.

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 of the discovery, and the Caltrans biologist and Resident Engineer must be notified. Coordination with CDFW and USFWS may be required prior to restarting activities.

BIO-General-7 Worker Environmental Awareness Program (WEAP)

A contractor-supplied biologist must present a Caltrans-approved biological resource information program/WEAP for special-status mammal, avian, reptile, invertebrate and rare plants prior to project activities, to all personnel that will be present within the project limits for longer than 30 minutes at any given time. Caltrans will require all construction personnel to participate in the WEAP training prior to participating in work activities. The training will be led by an approved biologist and delivered to all

construction personnel and new field-based personnel before engaging in construction activities.

BIO-General-8 Biological Monitor

A qualified contractor-supplied biologist must monitor project activities periodically as they progress throughout the length of the project limits to ensure that measures intended to protect desert bighorn sheep, desert tortoise, Gila monster, Crotch's bumble bee, monarch butterfly, nesting birds, and natural habitat during construction are being implemented and documented. This will include ensuring that work equipment, vehicles, and personnel do not enter habitat areas, and stopping work if a desert bighorn sheep, desert tortoise or Gila monster enters the work area.

BIO-General-9 Environmentally Sensitive Area

To address potential impacts to desert bighorn sheep, desert tortoise, Gila monster, Crotch's bumble bee, and monarch butterfly habitat, and rare plant environmentally sensitive areas, delineate the habitat areas for these special-status animal and plant species as an ESA as shown on the plans, as described in the specifications, and/or as determined by the designated biologist.

BIO-General-10 Environmentally Sensitive Area (ESA) Fence Monitoring

Integrity inspections of ESA fencing and desert tortoise temporary fencing and enclosures must occur throughout the duration of the project, 3 days prior to commencing project activities and weekly during project activities. If during construction the fence fails, work must stop until it is repaired, and the qualified biologist inspects (and clears) the job site.

BIO-General-11 Environmentally Sensitive Area (ESA) Fence Removal

All fencing must be removed as a last order of work. During removal, a qualified biologist must be present.

BIO-General-12 Animal Entrapment

To prevent inadvertent entrapment of desert tortoise during project activities, all excavated steep-walled holes or trenches more than 6 inches deep must be covered at the close of each working day by plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks. At the beginning of each working day, all such holes or trenches must be inspected to ensure no animals have been trapped during the previous night. Before such holes or trenches are filled, they must be thoroughly inspected for trapped animals. Trapped animals must be released by the qualified contractor-supplied biologist.

BIO-Plant-2 Rare Plant Pre-Construction Surveys

Within 1 week prior to construction, a preconstruction survey must be conducted by a contractor-supplied biologist for special-status plants within the Project Impact Area. Any rare plant species identified must be flagged for visual identification to construction personnel for work avoidance. Rare plant species detected that feature multiple plants in a single location must be fenced with temporary high-visibility fencing.

BIO-Reptile-1 Equipment Flagging

Project personnel must attach surveyor flagging tape to a conspicuous place on each piece of equipment to remind the operator to check under the equipment (including all vehicles, i.e., cars and trucks) for special status reptile species desert tortoise before operating equipment at any time.

BIO-Reptile-2 Trash/Predation

Caltrans must implement measures to reduce the attractiveness of job sites to common raven, and other predators and scavengers by controlling trash and educating workers.

BIO-Reptile-3 Temporary Demarcation

Temporary demarcation in the form of temporary desert tortoise fencing must be installed following the most recent USFWS guidelines for construction fencing, to delineate both sides of the PIA at the Whale Mountain Wash RSP work location (Bridge No. 54-0668L and 54-0558R; PM 152.1/152.2), with a 50-foot buffer as shown on the plans and/or described in the specifications, to exclude desert tortoise from these areas. Temporary desert tortoise fencing must also be installed at any equipment staging, storage, and borrow sites prior to construction, as shown on the plans, to exclude desert tortoise from these areas. All temporary demarcation materials must be removed once construction has been completed.

BIO-Reptile-4 Rock Slope Protection

To prevent trapping of desert tortoise, interstitial spaces within rock slope protection must be partially filled with concrete grout or sand.

BIO-Reptile-5 Special Status Reptile Survey

Prior to any construction activities, known desert tortoise habitat in the Biological Study Area, will be surveyed. Any special status reptile habitat area determined to be active and within 500 feet from the PIA shall be evaluated for breeding status using established CDFW Survey Protocols. If special status reptile individuals are detected during the preconstruction surveys within 500 feet of the PIA, construction activities shall be avoided in this area during the optimal survey period (April 15 to July 15). To avoid excessive delays to the project when special status reptiles are active near a project location, work at other project locations should be done first; any site near an active special status reptile area should be done last. The special status reptile presence/ absence survey should be conducted when air temperature is between 77 F

and 95 F. {Tollestrup 1976; USFWS 1985, 1998). Surveys must be conducted when the air temperature falls within the optimal range (CDFW 2019).

BIO-Avian-1 Pre-Construction Nesting Bird Survey

If project activities cannot avoid the nesting bird season, February 1 - September 30, then preconstruction nesting bird surveys shall be conducted by a qualified contractor-supplied biologist in areas of suitable habitat within the project limits and up to the limit of the BSA, no more than 3 days prior to construction to locate and avoid nesting birds. If an active avian nest is located, a no-construction buffer (100 feet for non-passerine, 300 feet for passerine, and 500 feet for raptors) shall be established and monitored by a qualified contractor-supplied biologist.

BIO-Avian-2 Pre-Construction Burrowing Owl Survey

Two burrowing owl preconstruction surveys must be performed by a qualified contractor-supplied biologist: one survey 14-30 days prior to project activities, and one survey 24 hours prior to project activities. The surveys will be conducted within the area of suitable burrowing owl habitat within State right-of-way and within the project limits. If pre-construction surveys confirm occupied burrowing owl habitat within this area, the qualified contractor-supplied biologist will coordinate with CDFW on additional measures that may be needed to ensure that no take of burrowing owl occurs.

BIO-Arthropod-1 Rare Insect Host Plant Preconstruction Clearance Survey, Flagging, and Fencing

No more than 1 week prior to project activities, a contractor-supplied biologist must perform a preconstruction survey within the PIA for rare insect host plants, including but not necessarily limited to milkweed (*Funastrum sp. and Asc/epias sp*.). Should any rare insect host plants be found, the Resident Engineer and Caltrans biologist must be contacted, and the host plants must be flagged by the contactor-supplied biologist for visual identification to construction personnel for work avoidance. Should multiple plants in a single location be found, the groupings must be fenced with Environmentally Sensitive Area (ESA) temporary fencing.

BIO-General-PSM-1 Agency Notification and Reporting Requirements

Any listed species within or near the job site, or as specified in BIO-General-6, found alive, injured, or dead during the implementation of the Project must be immediately reported to the Resident Engineer and Caltrans Biologist. The Caltrans Biologist must then notify the Resource Agencies. Veterinary treatment and/or final deposition must follow Resource Agencies' approval. Monitoring reports must include WEAP Training and be submitted to the Resources Agencies on a timeframe to be determined.

BIO-General-PSM-2 Environmentally Sensitive Areas and Ground Disturbance

No ground disturbing or fill activity of any type will be permitted within environmentally sensitive areas outside the Project footprint. All construction equipment shall be

operated in a manner to prevent accidental damage to nearby preserved areas outside the PIA. No structure of any kind, or incidental storage of equipment or supplies, will be allowed within these protected areas. Where appropriate, temporary high visibility fence will be installed at the environmentally sensitive area boundary to prevent accidental deposition of fill material in areas where vegetation is adjacent to planned ground disturbing activities.

BIO-Natural Community-PSM-1 Habitat Restoration

On-site habitat restoration for temporary impacts for Sensitive Natural Communities through revegetation and reseeding with vegetation native to the impacted area immediately following completion of construction activities, or with written approval from CDFW and/or USFWS, at the beginning of the next growing season after project completion.

BIO-Bat-1-PSM-12 Bat Preconstruction Surveys

Prior to work activities, a pre-construction survey at the Whale Mountain Wash bridges (Bridge No. 54-0668L and 54-0558R; PM 152.1/152.2), and an appropriate survey buffer shall be conducted for the presence of bat roosts by a qualified contractor-supplied bat biologist. Initial surveys are recommended to be conducted at least 6 months prior to the initiation of work within or adjacent to these bridges, ideally during the maternity season (typically April 1 to August 31), to allow time to prepare mitigation, and/or exclusion plans if needed in accordance with CDFW guidelines. If the pre-construction survey determines that no active roosts are present, then work activities shall commence within two weeks following the pre-construction survey.

BIO-Bat-2-PSM-13 Work Restriction Hours

Work activities should be restricted to daylight hours at work locations with suitable bat habitat (Whale Mountain Wash bridges (Bridge No. 54-0668L and 54-0558R; PM 152.1 /152.2). This would reduce the potential of direct or indirect impacts to bat species that may be foraging in the vicinity of the BSA. Should work activities be required at night, night lighting should be focused on the direct area of work

Compensatory Mitigation

BIO-Waters-1

Habitat enhancement for temporary impacts, which entails exotic and/or invasive plant control immediately following the impact.

BIO-Waters-2

On-site habitat restoration for temporary impacts for native communities through revegetation and reseeding with vegetation native to the impacted area immediately following completion of maintenance activities, or, with written approval from CDFW, at the beginning of the next growing season after project completion.

BIO-Waters-3

Permanent impacts will be mitigated for and decided upon with coordination from regulatory agencies.

BIO-Waters-4

Any additional permanent impacts to jurisdictional areas will be mitigated with appropriate mitigation measures to be identified during the regulatory permitting process.

2.1.5 Cultural Resources

Would the project:

Question	CEQA Determination
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §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

2.1.5.1 CEQA Significance Determinations for Cultural Resources

a), b), and c): No Impact

A Screened Undertaking (Caltrans, 2025d) was performed consistent with Caltrans' regulatory responsibilities under Section 106 of the National Historic Preservation Act (36 CFR Part 800) and pursuant to the December 2024 *Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the United States Army Corps of Engineers' Sacramento District, San Francisco District, and Los Angeles District, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act as it Pertains to the Administration of the Federal-Aid Highway Program in California (Section 106 PA).* The provisions of the Section 106 PA, Attachment 2, have been applied to this project and it was determined that this Project falls under Class 4, " establishment of chain control areas, park-and-ride lots, or maintenance pullouts," Class 6, "Minor utility installation or relocation," Class 11, "Modification of existing features, such as slopes, ditches, curbs, sidewalks, driveways, dikes, or headwalls, within or adjacent to the right of way," Class 13, "Addition or replacement of devices, such as glare screens, median barriers, fencing, guardrails, safety barriers, energy attenuators, guide posts, markers, safety cables, ladders, lighting, hoists, or signs," and Class 1, "Any work on Category 5 bridges, including rehabilitation or reconstruction."

As a result, this Project is exempt from further review, no additional archaeological or built environment studies are required and the Section 106 compliance process, CEQA cultural resources component, and PRC 5024 compliance are complete.

Avoidance, Minimization, and/or Mitigation Measures

The following avoidance and minimization measures will be implemented to address potential project impacts.

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) 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 [(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.

2.1.6 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

2.1.6.1 CEQA Significance Determinations for Energy

a) and b): No Impact. The Project is anticipated to use a minimal amount of energy during construction activities for the replacement of Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrading of guard railing end treatments and vegetation control, and upgrading sign panels with higher reflectivity. Construction-related effects on energy are likely to be greatest during energy use associated with the handling and transport of construction materials to and

from the site. However, these construction activities are expected to be short-term in duration and, therefore, not result in 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.

2.1.7 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: 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

2.1.7.1 CEQA Significance Determinations for Geology and Soils

a.i) and a.ii): No Impact

According to the California Department of Conservation, California Geological Survey's fault activity map, the nearest fault is the Chemehuevi Graben quaternary fault located more than 10 miles to the south of the Project site. 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.

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, 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.

a.iv), c), and d): No Impact

Based on the San Bernardino County Land Use Plan, General Plan Geologic Hazards Overlays map, the Project is not located in an area designated as having generalized landslide susceptibility or located in areas of expansive soils. Soil 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. Based on the San Bernardino County Land Use Plan, there are no areas of subsidence identified near the Project area. As such, no impacts are anticipated.

b): No Impact

Construction activities related to 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 practice for erosion and water quality control, would be utilized for the Project. 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.

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.

f): No Impact

As the Project is within a previously disturbed area, no paleontological resources would be disturbed and no further paleontological studies are required for the Project.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.8 GHG Emissions

Would the project:

Question	CEQA Determination
a) Generate GHG 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 GHGs?	No Impact

2.1.8.1 CEQA Significance Determinations for GHG Emissions

a): Less Than Significant Impact

The purpose of the Project is to replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, and upgrade sign panels with higher reflectivity. Construction GHG emissions were estimated using Caltrans Construction Emissions Tool (CAL-CET). Construction GHG emissions would result during the construction phase at different levels, with total construction GHG emissions of 284.38 metric tons CO_{2e} during the 200 day construction activity. 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.

b): No Impact

The project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions, including 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 Specifications (or most recent), Best Management Practices (BMPs), and the measures below would be implemented to minimize construction GHG 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.

GHG-2

The Project will maintain equipment in proper tune and working conditions.

2.1.9 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?	Less Than Significant 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?	Less Than Significant 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?	Less Than Significant 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 nautical 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

2.1.9.1 CEQA Significance Determinations for Hazards and Hazardous Materials

a) and b): Less Than Significant Impact:

Implementation of the proposed 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 into the environment. Typical construction-related hazardous materials, including fuel, solvents, paints, oils, and grease, would be used during construction. There is potential that any of these substances could be released during construction activities. However, compliance with

federal, state, and local regulations would ensure that all hazardous materials are used, stored, and disposed of properly, which is anticipated to minimize potential impacts related to a hazardous materials release during the construction phase of the proposed project. Any transport of hazardous materials to the site and removal of hazardous waste from the site would comply with State and Federal regulations and therefore anticipated to result in a less than significant impact.

c): No Impact:

The table below lists the schools within an approximate 0.25 mile radius of the proposed Project, their addresses, and approximate distances to the proposed Project.

Table 2-1. Schools within 0.25 Mile of Project

School	Address	Distance from Project
Kate Hohstadt Elementary School	500 D St., Needles CA 92363	0.08 mile
Needles Head Start/State Preschool	600 Cibola St., Needles CA 92363	0.08 mile
Needles High School	1600 Washington St, Needles CA 92363	0.15 mile
Needles Middle School	700 Bailey Ave, Needles CA 92363	0.3 mile
Vista Colorado Elementary School	700 Bailey Ave, Needles CA 92363	0.3 mile

Construction related hazardous materials typical for roadway improvement projects, including fuel, solvents, paints, oils, and grease, would be used during construction of the proposed Project. It is possible that any of these substances could be released during construction activities. However, impacts due to exposure to or disturbance of hazardous materials or wastes are generally limited to the Project site. While generally no impacts are anticipated, due to the being within 0.25-mile to the proposed Project site, impacts could be less than significant.

d): No Impact

According to the ISA Checklist (Caltrans, 2025f) prepared for the Project, a site visit and records searches were conducted with the California Department of Toxic Substances Control (DTSC) EnviroStor database and the State Water Resources Control Board GeoTracker database. Based on the results of the GeoTracker database, there are 2 open cases located approximately 528 feet from the edge of pavement at PM 141.9 and 2,314 feet from the edge of pavement at PM 142.4. These cases are not considered a concern for the Project because the affected medium is groundwater, and the static water level is approximately 50 feet below ground surface which is significantly deeper than the Project's maximum excavation depth of 8 feet. Based on the EnviroStor database, there are 3 open cases within a one-mile radius of the Project area. The first case is located 2,059 feet from the edge of pavement at PM 141.9 and lists soil and

groundwater as potential media of concern. A soil survey conducted within the Project limits indicates that soils do not exhibit hazardous waste characteristics. Additionally, excavation activities are not anticipated to reach the groundwater table. Therefore, no impacts to the Project are expected. The remaining two cases are classified under military evaluation. The Contractor shall avoid work outside of the Project limits near PM 142.8 and PM 144.2 due to these cases being under evaluation. Furthermore, an X-Ray Fluorescence (XRF) technology assessment was utilized to investigate the levels of aerially deposited lead (ADL) in the soils within the Project area. Based on the results of this assessment, the soils in the Project area are acceptable for unrestricted reuse onsite. As such, no impacts are anticipated.

e): No Impact

The proposed Project is located approximately two miles east of the Needles Airport, 711 Airport Road. The proposed Project does not include any features that would interfere with air traffic flight paths or other activities at the airport, nor would it result in a safety hazard or excessive noise for people residing or working in the project area. Therefore, no impacts are anticipated.

f): Less Than Significant Impact The proposed Project would replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, and upgrade sign panels with higher reflectivity. As such, the proposed Project is not expected to interfere with emergency response or evacuation plans. During construction of the proposed Project, emergency response times could increase temporarily due to increased traffic congestion caused by construction, speed reductions, and the presence of construction personnel and equipment. A Traffic Management Plan, included as TRA-1, would be implemented to minimize delays and help ensure continued emergency access to the Project area.

g): No Impact

Portions of I -40 within the Project limits traverse areas of moderate fire hazard severity zones in Local Responsibility Areas, meaning local agencies have the primary and financial responsibility of preventing and suppressing wildfires in these areas, according to the CALFIRE, Fire Hazard Severity Zones map. Although portions of the Project corridor are within a moderate fire hazard severity zone, the proposed Project would replace the existing RSP at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, and upgrade sign panels with higher reflectivity, so it 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

Caltrans 2024 Standard Specifications (or most recent), Best Management Practices (BMPs), and the minimization measures below would be implemented for Hazards and Hazardous Materials.

HAZ-1

Project will be performed in accordance with Caltrans Standard Special Provision Section 6-1.03B Local Material.

HAZ-2

Project will be performed in accordance with Caltrans Standard Special Provision Section 14-11.14 Treated Wood Waste.

HAZ-3

Project will be performed in accordance with Caltrans Standard Special Provision Section 7-1.02k(6)(j)(ii) for submittal of lead compliance plan as an information submittal.

HAZ-4

Project will be performed in accordance with Caltrans Standard Special Provision Section 7-1.02k(6)(j)(iii) for unregulated earth materials.

HAZ-5

Project will be performed in accordance with Caltrans Standard Specifications Section 14-11.15 for specifications for disposing of electrical equipment containing hazardous waste.

2.1.10 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 that 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: (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
(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

Question	CEQA Determination
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

2.1.10.1 CEQA Significance Determinations for Hydrology and Water Quality

a): No Impact

Short term or temporary construction impacts on water quality have the potential to occur during ground disturbance activities, material and equipment use and storage at staging areas, and other construction activities. As the Project would be constructed entirely within existing State right of way, the California Statewide Order Number 2022-0057-DWQ, NPDES No. CAS000002 and 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 BMPs for construction runoff and protect water quality. Compliance with the NPDES requirements would further reduce polluting impacts during construction. Projects within the State right of way are obligated to comply with the latest Caltrans and Regional Water Quality Control Board (RWQCB) water quality standards relative to the treatment of post-construction stormwater runoff. Determination and implementation of BMPs within the right of way 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, impacts are not anticipated.

b): No Impact

The Project would preserve the structural integrity and extend the service life of the existing Whale Mountain Wash bridges in a safe and economic manner, and upgrade guard rail end treatments, sign panels, and lighting to improve safety of the traveling public and workers. Ground disturbance is anticipated to be minimal and shallow, as such, groundwater is not anticipated to be affected by the Project.

c(i), (ii), (iii), and (iv): No Impact

The Project would not alter 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.

d): No Impact

Portions of the Project area is primarily within Flood Hazard area indicating the 1 percent annual chance of flood (100-year flood), Zone A, based on the FEMA FIRM map. However, the Project is an existing transportation facility and would not introduce a new use that would substantially change the pollutants that currently exist in the Project area. The Project would include BMPs to reduce pollutants from the transportation uses associated with the Project. Therefore, the Project would not increase the risk of release of pollutants due to inundation.

e): No Impact

The Project would comply with the applicable NPDES permits and implement construction BMPs to reduce pollutants of concern in stormwater runoff so that the Project would not degrade water quality or conflict with or obstruct implementation of a water quality control plan. No impacts are anticipated in this regard.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.11 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

2.1.11.1 CEQA Significance Determinations for Land Use and Planning

a), b): No Impact

The Project work would be fully within existing Caltrans right of way. As I-40 is an existing roadway, no physical division is anticipated to be 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. Implementation of the Project would be consistent with the San Bernardino County General Plan Land Use Element and City of Needles

Land Use and Transportation Element. No impacts on existing established communities are anticipated.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.12 Mineral Resources

Would the project:

Question	CEQA Determination
a) Result in the loss of availability of a known mineral resource that would be a 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

2.1.12.1 CEQA Significance Determinations for Mineral Resources

a) and b): No Impact

Based on the San Bernardino Mineral Resource Zone Mapping, the southern terminus of the Project limits are located within an area designated as MRZ-3a for industrial minerals. Areas designated as MRZ-3a are subzones where construction aggregate or other mineral resources are likely present, but additional exploration and evaluation are needed to confirm their economic value. The Project is entirely located within the Caltrans right of way, along a developed roadway, 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.

2.1.13 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

Question	CEQA Determination
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 nautical 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

2.1.13.1 CEQA Significance Determinations for Noise

a), b), and c): No Impact

According to the Noise Memorandum (Caltrans, 2025e) dated June 30, 2025, the proposed Project is considered a Type III project under 23 CFR 772.7 in the Traffic Noise Analysis Protocol dated April 2020. As such, the Project is considered exempt from noise impact analysis requirements and does not require a noise analysis.

In addition, construction of the proposed Project would occur along the existing highway corridor, which currently experiences noise levels consistent with an active highway. No nighttime construction activities are planned, and no noise impacts are anticipated.

Any groundborne noise or vibration would only occur during construction activities within an active highway and would be short term in duration. The generation of excessive groundborne vibration or groundborne noise is not anticipated.

The proposed Project is located approximately two miles east of the Needles Airport, which is a general use public airport; however, it is not anticipated to expose people residing or working in the area to excessive noise levels than what is already existing and no impacts are anticipated to occur.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.14 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

2.1.14.1 CEQA Significance Determinations for Population and Housing

a) and b): No Impact

The Project proposes to replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, and upgrade sign panels with higher reflectivity. These improvements would not result in the construction of new homes or businesses, nor would there be a need for roads or other infrastructure that would induce unplanned population growth. In addition, no residents or businesses would need to be relocated as a result of the proposed Project; therefore, there would be no impacts to population and housing.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.15 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

2.1.15.1 CEQA Significance Determinations for Public Services

a), b), c), d), e): No Impact

Advanced coordination and notification would occur with the California Highway Patrol, San Bernardino County Sheriff's Department, and San Bernardino County Fire Protection District. After completion of the Project, the safety of the traveling public would be improved due to upgrades to guard rail end treatments, sign panels, and lighting, as well as the structural integrity improvements to extend the service life of the existing Whale Mountain Wash bridges. The Project does not include construction of structures or features that would increase demand on public services for the Project area. The Project does not include construction of housing or other uses that would necessitate the construction of additional public facilities such as schools or parks in the Project area.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.16 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

2.1.16.1 CEQA Significance Determinations for Recreation

a) and b): No Impact

The Project proposes to replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, upgrade sign panels with higher reflectivity, and upgrade lighting to the latest standards. Implementation of the proposed Project would not 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.

2.1.17 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) Conflict or be inconsistent with State 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?	Less Than Significant Impact

2.1.17.1 CEQA Significance Determinations for Transportation

Response to Item a) No Impact. The proposed Project would replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, upgrade sign panels with higher reflectivity, and upgrade lighting to the latest standards. As such, the Project would not conflict with the San Bernardino County Policy Plan, or the City of Needles Land Use and Transportation Element and no impacts are anticipated.

Response to Item b): No Impact. As the proposed Project involves replacing RSP, upgrading guard rail end treatments, sign panels, and lighting, as well as improving roadside safety, it does not involve any capacity increasing elements and therefore, the proposed 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 proposed Project would not substantially increase hazards because of a design feature or incompatible uses. In general, the Project involves replacing RSP, upgrading guard rail end treatments, and sign panels. Therefore, no impacts are anticipated in this regard.

Response to Item d): Less Than Significant 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 proposed 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 proposed Project is expected to also provide continuous, and uninterrupted access to I-40 throughout the duration of construction. Less than significant impacts are anticipated during the construction period.

Avoidance, Minimization, and/or Mitigation Measures

The following avoidance and minimization measure would be implemented:

TRA-1

Prior to construction, a TMP will be prepared to minimize potential impacts on emergency services and commuters during construction.

2.1.18 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

2.1.18.1 CEQA Significance Determinations for Tribal Cultural Resources

a) and b): No Impact

In compliance with Assembly Bill 52, consultation meetings were held with Native American representatives from the Quechan Indian Tribe of the Fort Yuma Reservation and Chemehuevi Indian Tribe. Both tribes expressed that they had no concern regarding the Project's potential to affect cultural resources or resources significant to the tribe; therefore, no impacts are anticipated to tribal cultural resources.

Avoidance, Minimization, and/or Mitigation Measures

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

2.1.19 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 stormwater 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

Question	CEQA Determination
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
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

2.1.19.1 CEQA Significance Determinations for Utilities and Service Systems

a): No Impact. The Project would result in upgrades and improvements to I-40 including the replacement and upgrade of existing lighting to the latest standards. The Project 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.

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 upgrades and improvements to I-40, no impacts are anticipated on water supplies.

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. Construction activities are not expected to increase capacity of existing wastewater treatment facilities. As such, no impacts are anticipated in this regard.

d): No Impact. As the Project would replace the existing Rock Slope Protection (RSP) at the Whale Mountain Wash bridges (Bridge Numbers 54-0668L and 54-0668R), upgrade guard railing end treatments including vegetation control, and upgrade sign panels with higher reflectivity, it is anticipated that it would only generate a minimal amount of solid waste during the construction phase and no solid waste would be generated during operation. Furthermore, it is Caltrans' policy to recycle construction materials whenever possible. Opportunities to salvage and recycle items, would also be considered. As such, the Project is not expected to impair the attainment of the state's solid waste reductions goals.

e): No Impact. The Project would require the use of a local landfill, if applicable, to dispose of construction debris and construction-related materials. The use of a local landfill 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.

2.1.20 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

2.1.20.1 CEQA Significance Determinations for Wildfire

a): No Impact

The Project is not anticipated 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 Traffic Management Plan (TMP) would be implemented to minimize potential delays and help to ensure continued emergency access to the Project area.

b), c), and 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 State of California, Office of the State Fire Marshall, CalFire Fire Hazard Severity Zone map, portions of I -40 within the Project limits traverse areas of moderate fire hazard severity zones in Local Responsibility Areas (LRA), meaning local agencies have the primary and financial responsibility of preventing and suppressing wildfires in these areas. 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 as a 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.

2.1.21 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 Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	Less Than Significant with Mitigation Incorporated
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	No Impact

2.1.21.1 CEQA Significance Determinations for Mandatory Findings of Significance

a): Less Than Significant Impact

With the following avoidance and minimization measures (**BIO-General-1, BIO-General-4b, BIO-General-6, BIO-General-7, BIO-General-8, BIO-General-9, BIO-General-10, BIO-General-11, BIO-General-12, BIO-General-PSM-1, BIO-Reptile-1, BIO-Reptile-2, BIO-Reptile-3, BIO-Reptile-4, BIO-Reptile-5**), impacts will be avoided to species. The Project anticipates "No Take" of any State-listed special status species pursuant to the California Endangered Species Act, due to lack of suitable habitat in the Project area, lack of species presence, and/or with the implementation of avoidance and minimization measures. The Project is not anticipated to cause State Species of Special Concern to trend toward a State-listed status.

b): Less Than Significant with Mitigation Incorporated

Natural communities such as Creosote Bush Scrub and Mojave Desert Wash Scrub vegetation community have experienced cumulative impacts from development and human activity, including the construction of I-40. The estimated project acreage of impacts to these natural communities is low and will be avoided and minimized in

accordance with **BIO-General-1, BIO-General-9, BIO-General-10, BIO-General-11, BIO-Natural Community-PSM-1**.

Permanent impacts are anticipated for Waters of the State as a result of rock slope protection installation. The expected impacts to Waters of the State will be determined during the PS&E phase of the Project, pending further field investigation and design review and refinement. These impacts will require mitigation to comply with the CDFW "no net less" policy as referenced in **BIO-Waters-2**, **BIO-Waters-3**, and **BIO-Waters-4**.

Special-status plants and animals have experienced cumulative impacts from development, habitat degradation, human and vehicular traffic, and other factors in the Project areas such as the development of I-40. The Project would occur within Caltrans right of way in areas that are mostly developed and disturbed by the existing highway. Impacts to desert tortoise will be avoided and minimized through **BIO-General-1, BIO-General-4b, BIO-General-6, BIO-General-7, BIO-General-8, BIO-General-9, BIO-General-10, BIO-General-11, BIO-General-12, BIO-General-PSM-1, BIO-Reptile-1, BIO-Reptile-2, BIO-Reptile-3, BIO-Reptile-4, BIO-Reptile-5**.

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

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. The Project would occur within existing transportation right-of-way and would comply with applicable standard specifications and regulatory requirements. The Project would not introduce new hazardous conditions or increase the potential for exposure to hazards. Therefore, no impacts would occur.

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 (SF_6), 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.

2.2.1 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.

2.2.1.1 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 (CAFE) standards for on-road motor vehicles sold in the United States. These standards are periodically updated and published through the federal rulemaking process.

2.2.1.2 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 (ARB) 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.

2.2.2 Environmental Setting

The proposed project is in a rural, desert area. I-40 is the main transportation route to and through the city of Needles for both passenger and commercial vehicles. The nearest alternate route is SR-95, that intersects with I-40 in Needles. 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 Countywide Plan, Infrastructure and Utilities and Natural Resources Elements address GHGs in the project area.

2.2.2.1 GHG Inventories

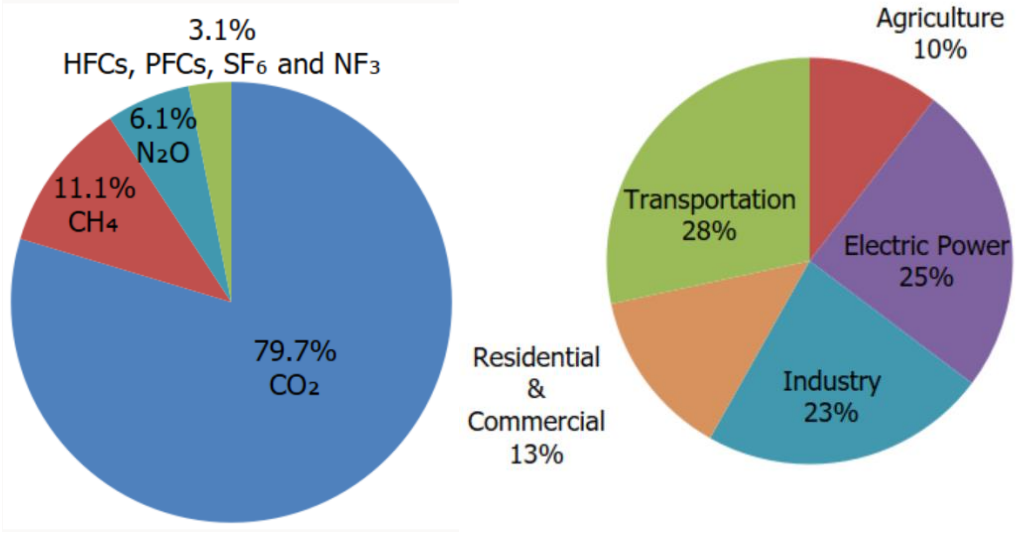
A GHG emissions inventory estimates the amount of GHGs discharged into the atmosphere by specific sources over a period of time. Tracking annual GHG emissions allows countries, states, and smaller jurisdictions to understand how emissions are changing and what actions may be needed to attain emission 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, CO_2 emissions decreased by only 2% (U.S. EPA 2024a).

The transportation sector's share of total GHG emissions remained at 28% in 2022 and continues to be the largest contributing sector (Figure 2-1). Transportation activities accounted for 37% of U.S. CO_2 emissions from fossil fuel combustion in 2022. This is a decrease of 0.5% from 2021 (U.S. EPA 2024a, 2024b).

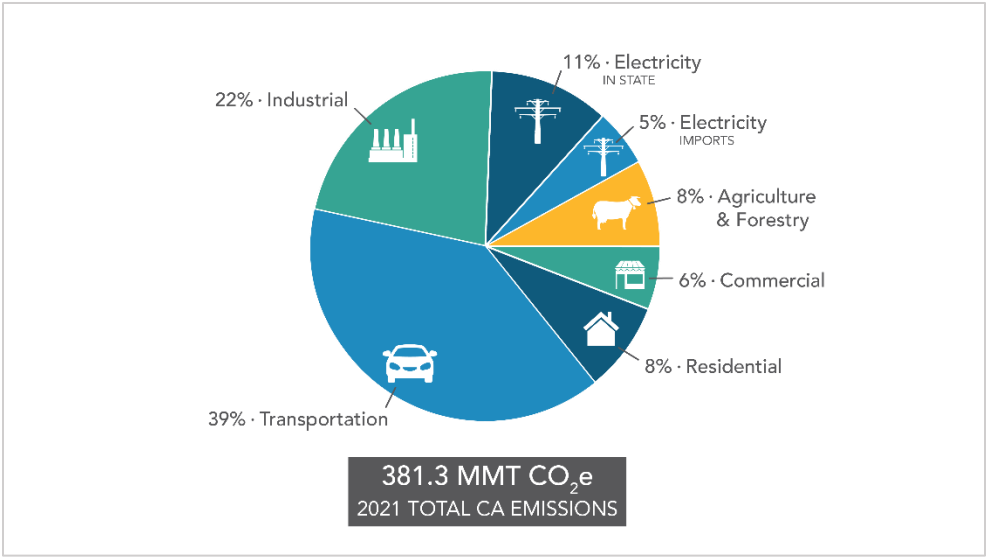


Source: U.S. EPA 2024b.

Figure 2-1. U.S. 2022 Greenhouse Gas Emissions

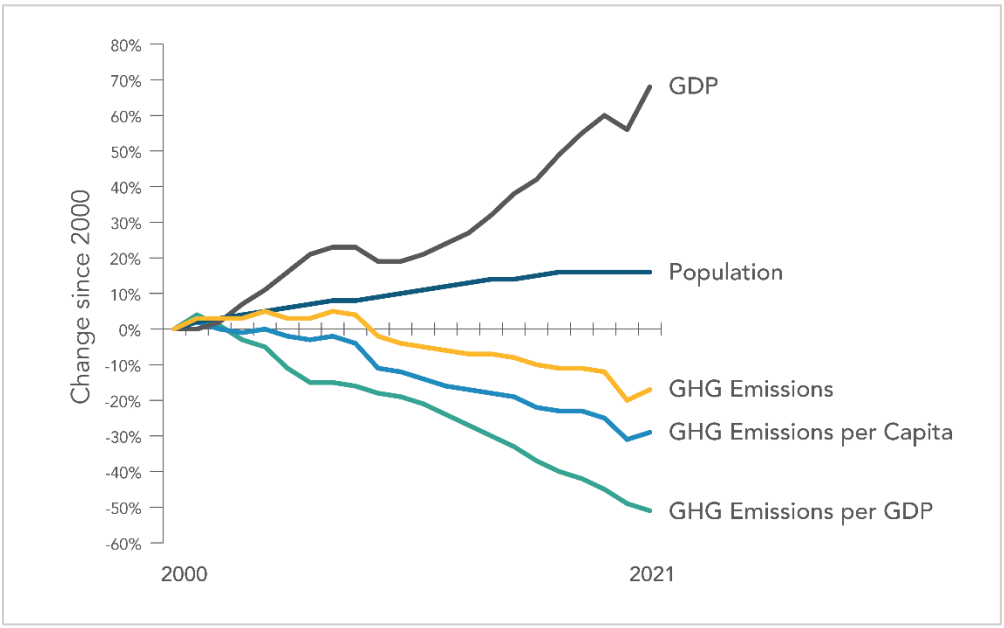
State GHG Inventory

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 2-3) (ARB 2023).Transportation emissions remain the largest contributor to GHG emissions in the state (Figure 2-2)(ARB 2023).



Source: ARB 2023.

Figure 2-2. California 2020 Greenhouse Gas Emissions by Economic Sector



Source: ARB 2023.

Figure 2-3. Change in California GDP, Population, and GHG Emissions Since 2000

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).

2.2.2.2 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 2-2. 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 • Complete Streets • Transit and Multimodal Integration • Transportation System Management • Transportation Demand Management • Air Quality • Clean Transportation • Goods Movement
San Bernardino County Regional Greenhouse Gas Reduction Plan (adopted March 2021)	• On-Road-1: Alternative Fueled Transit Fleets – CNG to Electric. • On-Road-2: Encourage Use of Mass Transit, Carpooling, Ridesharing, and Telecommuting. • On-Road-3: Improve Efficiency through Signal Synchronization. • On-Road-4: Expand Bike Routes Including Pedestrian and Bicycle Friendly Streets • On-Road-5 Community Fleet Electrification.
San Bernardino County Countywide Plan (adopted in 2020)	Natural Resources Element- Goal NR-1 Air Quality: • Policy NR-1.7 Greenhouse gas reduction targets • Policy NR-1.8 Construction and operations Transportation & Mobility Element Goal TM-3 Vehicle Miles Traveled: • Policy TM-3.1 VMT reduction • Policy TM-3.2 Trip reduction strategies • Policy TM-3.3 First mile/last mile connectivity Goal TM-4 Complete Streets, Transit & Active Transportation • Policy TM-4.1 Complete streets network

Title	GHG Reduction Policies, Goals, or Strategies
	• Policy TM-4.5 Transit access to job centers and tourist destinations • Policy TM-4.7 Regional bicycle network • Policy TM-4.8 Local bicycle and pedestrian networks Renewable Energy & Conservation Element: • Goal RE-1 Energy Conservation & Efficiency • Goal RE-2 Renewable Energy Systems • Goal RE-3 Community-Oriented Renewable Energy • Goal RE-4 Environmental Compatibility

2.2.3 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.

2.2.3.1 Operational Emissions

The objective of the Project is to preserve the structural integrity and extend the service life of the existing Whale Mountain bridges in a safe and economic manner, as well as to upgrade guard railing end treatments, and sign panels, to improve the safety of the traveling public and workers. 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.

2.2.3.2 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.

The Caltrans Construction Emissions Tool (CAL-CET) was used to estimate construction and greenhouse gas (GHG) emissions. Construction of the Project would produce 284.38 metric tons CO_{2e} over the approximately 200-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.

2.2.3.3 CEQA Conclusion

The purpose of the Project is to preserve, repair, and extend the service life of the existing pavement and improve the ride quality of the roadway. Construction GHG emissions would result during the construction phase at different levels, with total construction GHG emissions of 284.38 metric tons CO_{2e}. 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.

2.2.4 Greenhouse Gas Reduction Strategies

2.2.4.1 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 2022b).

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).

2.2.4.2 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 and current Caltrans procedures and activities that track and reduce GHG emissions. It identifies additional opportunities for further reducing GHG emissions from Department-controlled emission sources, in support of Caltrans and State goals.

2.2.4.3 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**.**

2.2.5 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.

2.2.5.1 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 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).

2.2.5.2 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).

2.2.5.3 Caltrans Adaptation Efforts

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 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).

2.2.5.4 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 Flood Insurance Rate Map (Map Number 06071C5010H, 06071C5030J, 06071C5050H, 04015C5675H, 04015C5650H, 04015C5375J), the proposed project is located within Zones X, D, A, and AO. The portions of the project located within Zones A and AO have a 1-percent annual chance of flooding. 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 1.9% by 2055 and by up to 1.8% by 2085.

Wildfire

Based on the Caltrans District 8 Vulnerability Assessment Map (Caltrans 2023), the project is located within a moderate level of wildfire exposure concern for 2040 to 2069. Based on the CalFire Fire Hazard Severity Zones map, the Project site and adjacent areas are located in a Local Responsibility Area with Moderate Fire Hazard Severity Zone (FHSZ).

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 up to 3.8 degrees Fahrenheit by 2055, and by up to 7.4 degrees Fahrenheit by 2085. The average maximum temperature over seven consecutive days in the project area will increase by up to 6.65 degrees Fahrenheit by 2055, and by up to 10.1 degrees Fahrenheit by 2085. As such, the climate specific to the Project's location will be taken into consideration for selection of roadway and structural materials.

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Chapter 3 Comments and Coordination

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

Native American Coordination

The California Native American Heritage Commission (NAHC) was contacted, and a request was made to perform a Sacred Lands File (SLF). The NAHC responded September 22, 2025, and provided negative SLF results with a list of tribal contacts. The following Native American Tribes were contacted: Chemehuevi Indian Tribe, Colorado River Indian Tribes, Fort Mojave Indian Tribe, Quechan Indian Tribe of the Fort Yuma Reservation, Twenty-Nine Palms Band of Mission Indians.

Caltrans participated in meetings with Native American Tribes including Quechan Indian Tribe of the Fort Yuma Reservation and Chemehuevi Indian Tribe during consultation. An initial letter was sent on September 25, 2025 to Jill McCormick, Historic Preservation Officer for the Quechan Indian Tribe of the Fort Yuma Reservation. A meeting was held on October 2, 2025 with Jill McCormick to discuss the Project. An initial letter was sent to the Tribal Historic Preservation Office Director of the Chemehuevi Indian Tribe on September 25, 2025. A meeting was held on September 26, 2025 to discuss the Project with the Chemehuevi Indian Tribe. Both tribes expressed they had no concern regarding the projects potential to effect Cultural resources or resources significant to the tribe.

An initial letter was sent to the Colorado River Indian Tribes on September 25, 2025, with follow-up letters sent on October 23, 2025 and November 25, 2025. No response has been received to date. The Fort Mojave Indian Tribe was contacted by letter on September 25, 2025, with follow-up letters sent on October 23, 2025, and November 25, 2025. No response has been received to date. The Twenty-Nine Palms Band of Mission Indians Cultural Resources Manager was mailed a letter on September 25, 2025 with follow-up letters sent on October 23, 2025, and November 25, 2025. No response has been received to date.

3.1 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.

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Interested Parties, Property Owners, and Members of the Public

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WHITTIKER, WILLIAM C 653 SCHUG ORANGE, CA 92669	KOHLS, MICHAEL K 18130 GLENNEL DR RIVERSIDE, CA 92508	ZAMORA, DAVID M 19452 KINAI RD APPLE VALLEY, CA 92307
LIMON, JESUS OTILIA TRUST 1/20/20 224 CHESTNUT ST NEEDLES, CA 92363	SOTO, PAUL D 162 S STANFORD LINDSAY, CA 93247	MCCORKLE, BRIAN 1215 SAFARI NEEDLES, CA 92363
ANDRADE, WENDY 8026 HAVEN VIEW DR RIVERSIDE, CA 92509	MORALES, ARTHUR 708 BUNKER HILL DR SAN BERNARDINO, CA 92410	HUECKSTAEDT, GERALD L 2075 SOLERA ST BRENTWOOD, CA 94513
CAVALLO, JOSEPH 17897 MACARTHUR BLVD #200 IRVINE, CA 92614	LINEBERRY, DAVE 2408 W BROADWAY NEEDLES, CA 92363	MORRIS, PATRICK J 9330 BALBOA AVE SAN DIEGO, CA 92123
WAGON WHEEL OF NEEDLES, INC 2420 NEEDLES HWY NEEDLES, CA 92363	VILLALOBOS, ANNA MOLINA 624 GREEN AVE SAN BRUNO, CA 94066	GREENLEE, MARC 1657 STONEWATER DR HERMITAGE, TN 37076
CIMINO, JIM & SHEILA TRUST 12/29/10 27255 MESSINA ST HIGHLAND, CA 92346	PARKER, PATRICIA J 800 MARKET ST NEEDLES, CA 92363	ZOZAYA, STEVEN M 208 GILMAN ST NEEDLES, CA 92363
RANIA INVESTMENTS LLC 3928 HIDDEN CREEK CT ROCHESTER, MI 48309	LUA, YANIRA 1681 E YALE ST ONTARIO, CA 91764	MARICINE INC 1311 BROOKS # H BALDWIN PARK, CA 91706

HECHT, THOMAS C 1207 10TH ST MANHATTAN BEACH, CA 90266	SPURNEY, SHAWN JOSEPH 9202 LEMON AVE TEMPLE CITY, CA 91780	NEEDLES PROPERTIES LLC 2371 NEEDLES HWY NEEDLES, CA 92363
SAINTALIX, ALAIN 1770 N HIGHLAND AVE #423 HOLLYWOOD, CA 90028	HAGSTROM, MICHAEL K 610 B NEEDLES, CA 92363	NICKELL, STEVEN & MARCIE FAM TR 3/4 3341 CRESTWIND DR LAKE HAVASU CITY, AZ 86404
RODENBAUGH, WILLIAM II 2900 COLUMBUS ST BOISE, ID 83705	ANDERSEN, JOHN R 2186 E LAGUNA RD MOJAVE VALLEY, AZ 86440	RUBIN, STEVEN 556 N 16TH ST SAN JOSE, CA 95112
VILORIA, L EO M TR 111 E MISSION RD ALHAMBRA, CA 91801	PANHWAR, SANI H 12235 ASHCROFT CIR EASTVALE, CA 91752	BEAUCHAMP, ALTON L 1495 HIGHLAND NEEDLES, CA 92363
BASER, REBECCA 1597 GRAN CIRCULO FORT MOHAVE, AZ 86426	WASSERMAN REVOCABLE TRUST 5/14/15 2020 EL MONTE ST NEEDLES, CA 92363	RICHO, MADALAINE 605 CIBOLA ST NEEDLES, CA 92363
CAVANAUGH, WILLIAM 14929 GARFIELD AVE PARAMOUNT, CA 90723	ANDRADE, EDWARD 8616 CHIFNEY LN RIVERSIDE, CA 92509	NDLS PROPERTY INVESTMENTS 10604 N TRADEMARK PKWY STE 300 RANCHO CUCAMONGA, CA 91730
ELAWAR, SHAB AND FAMILY CHARITABLE T 3998 N MT VIEW AVE SAN BERNARDINO, CA 92405	DEER PARK DEV CORP 42171 BIG BEAR BLVD 6848-129 BIG BEAR LAKE, CA 92315	MARTINEZ, JUANA MEDINA 17755 FAIRVIEW DR FONTANA, CA 92336
CURTIS, GLENN 716 TOPEKA ST KINGMAN, AZ 86401	ROBINSON, R & D FAMILY TRUST 303 RIDGE RD BOULDER CITY, NV 89005	MORRIS, PAT & SALLY TRUST 2021 685 MAYWOOD AVE SAN BERNARDINO, CA 92404
LOPEZ, RUTH & ROBERT LIVING TR 12-31 420 E ST NEEDLES, CA 92363	ROMERO, MARK 1397 EMPIRE RD MOHAVE VALLEY, AZ 86440	CELTIC BANK CORPORATION 268 S STATE STREET STE 300 SALT LAKE CITY, UT 84111
MALDONADO, DARLEEN 1415 HIGHLAND AVE NEEDLES, CA 92363	SCRE INV III LLC 1519 E CHAPMAN AVE #91 FULLERTON, CA 92831	SWAIN, WILLIAM H 3 CRESTVIEW DR NEEDLES, CA 92363

DUKE LIVING TRUST 1/23/20 1400 3RD ST NEEDLES, CA 92363	TEIGE, JOHN E 491 QUIET CT SIMI VALLEY, CA 93065	HAND, GRACE INTER VIVOS TRUST 10/21 25 NARCISSA DR RANCHO PALOS VERDES, CA 90275
EVC PARTNERS LLC 2410 FAIR OAKS BLVD #110 SACRAMENTO, CA 95825	ANDREWS FARMS LLC 4082 MARINA LAGOON DR LAUGHLIN, NV 89029	1707 NEEDLES HWY LLC 11400 MT GLEASON AVE LOS ANGELES, CA 91042
MENDEZ, IRENE 221 CHESTNUT ST NEEDLES, CA 92363	TOVAR, AIDE M 321 CHESTNUT NEEDLES, CA 92363	JUSTICE, JOHN R 10221 S HAPPY VALLEY RD MOHAVE VALLEY, AZ 86440
WHEELER, KATHERYN M 300 WALNUT ST NEEDLES, CA 92363	GLEDHILL, ALLAN D 505 CALIFORNIA AVE NEEDLES, CA 92363	VICI INVESTMENTS LLC 7215 CHARMANT DR #915 SAN DIEGO, CA 92122
HARKNESS, KARLEN 800 MARKET ST NEEDLES, CA 92363	HANNAWI, MARK MAGED 10420 S HARBOR MOHAVE VALLEY, AZ 86440	CLARK LIVING TRUST 12/13/23 77 ZOE LN NEEDLES, CA 92363
PRYOR, DEBORAH SUSAN 170 PRIVATE RD 1731 MICO, TX 78056	SHETH, ARCHANA 1325 BLAINE ST RIVERSIDE, CA 92507	SHEIKH, MOHAMED A 4852 VIA DE LA LUNA YORBA LINDA, CA 92886
KHALSA, SIRI D S 1390 WALLER ST SAN FRANCISCO, CA 94117	INVENTIVE CORP LLC 1816 HOWARD AVE LAS VEGAS, NV 89104	COOLEY, SCOTT M SEPARATE PROPERTY TR 15900 KENNEDY RD LOS GATOS, CA 95032
LALEHZADEH, ALI REZA 1102 W 17TH ST #204 SANTA ANA, CA 92706	BRUTON, KEVIN J 111 ALISO ST NEEDLES, CA 92363	STOUT, FRED 15020 MUSTANG LN FONTANA, CA 92336
BHAKTA, DHANSUKHBHAI L 2104 NEEDLES HWY NEEDLES, CA 92363	COUNTY OF SAN BERNARDINO 385 N ARROWHEAD AVE 3RD FL SAN BERNARDINO, CA 92415	CAMPBELL, J BRIAN 1406 BAILEY AVE STE G NEEDLES, CA 92363
FAITH CHAPEL CHURCH OF GOD 1508 HIGHLAND AVE NEEDLES, CA 92363	NEEDLES PUBLIC UTILITY AUTHORITY 817 3RD ST NEEDLES, CA 92363	LARRAYA, MARTIN & MYRLE REV TR 07/1 633 N STIMSON LA PUENTE, CA 91744

AARUP, THOMAS W 218 J ST NEEDLES, CA 92363	GABLE, LISA K 620 CALIFORNIA AVE NEEDLES, CA 92363	GREENS DEVELOPMENT INC 16530 BAKE PKWY STE 200 IRVINE, CA 92618
ECHELON 2020 LLC 420 N MAIN ST MONTGOMERY, IL 60538	DESERT WEST EQUITIES I 4208 W EVANS PHOENIX, AZ 85023	SHREEJI KRUPA LLC 2176 BIRCH SQ LAKE HAVASU CITY, AZ 86403
LANDIS, JAN CHARLES 8631 STAR LN JOSHUA TREE, CA 92252	LUM, BING 1401 BAILEY AVE NEEDLES, CA 92363	CHINAHKASH, SHAHRAM 38730 LA MANCHA CT PALMDALE, CA 93550
1001 LILLY HILL PARTNERS LP 3 E STOW RD MARLTON, NJ 08053	JAMES, ALICE RUTH 525 CALIFORNIA AVE NEEDLES, CA 92363	LEWIS, GARY 173 VICTORY DR NEEDLES, CA 92363
REDMOND, ROBERT WAYNE 16251 WAIKIKI LN HUNTINGTON BEACH, CA 92649	TORRES, JENNIE A LIVING TRUST 2/10/1 527 CALIFORNIA AVE NEEDLES, CA 92363	ESTRADA, INEZ V 306 CHESTNUT ST NEEDLES, CA 92363
KELLER, LILLIAN AMBER 6 CRESTVIEW DR NEEDLES, CA 92363	APOMIX LLC 2001 LUNA VIS NEEDLES, CA 92363	ANDREWS, BILLY W JR 4082 MARINA LAGOON DR LAUGHLIN, NV 89029
CAIRNS, DAVID J 509 CALIFORNIA AVE NEEDLES, CA 92363	PROA, ESTHER DIANE 577 CALIFORNIA AVE NEEDLES, CA 92363	BRAVO, JOSE LUIS 2109 EL MONTE ST NEEDLES, CA 92363
ARRIOLA, DONNA J 518 D ST NEEDLES, CA 92363	AMEZQUITA, LAURO SANCHEZ 212 I ST NEEDLES, CA 92363	SMITH, PAMELA A 900 S FORK RD #20 LYTLE CREEK, CA 92358
HUNTER, JOHN A 1055 W COLLEGE AVE #274 SANTA ROSA, CA 95401	AARUP, THOMAS T 17112 SANTA RITA FOUNTAIN VALLEY, CA 92708	KOERPER, TODD K 905 BUSH ST NEEDLES, CA 92363
COMFORT REVOCABLE TRUST 1/4/18 805 N PENNSYLVANIA LN GLENDORA, CA 91741	ROWE, ROBERT PAUL 300 SUNFLOWER DR LAKE HAVASU CITY, AZ 86403	NDLS PROPERTY INVESTMENTS INC 10604 N TRADEMARK PKWY #300 RANCHO CUCAMONGA, CA 91730

THOMAS, JULIA 12365 YORKSHIRE DR APPLE VALLEY, CA 92308	KIRELIUK, WILLIAM O TR 298 SHAWNAN LN LA HABRA, CA 90631	NORD, WARREN G III 506 DESNOK ST NEEDLES, CA 92363
VILLEGAS, MARGARET M 310 O ST NEEDLES, CA 92363	COFFELT, JOHN TR 12290 INDIAN RIVER DR APPLE VALLEY, CA 92308	MARTINEZ, AARON BENJAMIN 48186 KING ST CAVAZOS, TX 76544
WM DAL PORTO & SONS INC 4135 OAKRIDGE WAY STOCKTON, CA 95204	TAMAYO, GUILLERMO 3109 SUMMER SIDE CT BAKERSFIELD, CA 93309	O DELL, HUEY M JR 302 FAIRMONT AVE NEEDLES, CA 92363
CHAVEZ, LESLY A 7002 STANSBURY AVE VAN NUYS, CA 91405	JEWELL, ALFRED J AND GAIL F TRS 1513 FRONT ST NEEDLES, CA 92363	MC DONALD, FRED L 10731 HOLLISTER RD OAK HILLS, CA 92345
AGUILERA, ROSA 705 VALLEY AVE NEEDLES, CA 92363	VILLEGAS, YOLANDA 5612 S WISHING PL FOR, AZ 86426	ALVA, SUSAN 9325 COPPER LN FONTANA, CA 92335
JOHNSON, TREVOR 810 BUSH ST NEEDLES, CA 92363	WESTVIEW AUSTIN LP 1001 AVENIDA PICO C418 SAN CLEMENTE, CA 92673	CHIHUAHUA LLC 1321 FRONT ST NEEDLES, CA 92363
JOY, RICHMOND R 201 SPRUCE ST NEEDLES, CA 92363	ROSE, RHYANNON ALLYSON 732 R & VINE ST NEEDLES, CA 92363	UPPER COAST CHURCH OF GOD IN CHRIST 2058 PASEO DEL REY ST NEEDLES, CA 92363
SMITH, THERESA C TR 6/17/94 1100 S BUFFALO DR #130 LAS VEGAS, NC 89117	AYUDA AL NINO BOLIVIANO INC 9219 TRAILHEAD PT JURUPA VALLEY, CA 92509	CLARK, CANDACE 223 SPRUCE ST NEEDLES, CA 92363
CANIZALES, STEPFANIE C 839 S BRAMPTON AVE RIALTO, CA 92376	ROCKWOOD, GEORGE K 595 CIBOLA ST NEEDLES, CA 92363	RASPLICKA, HAROLD FAMILY TRUST - EST 21730 JEFFERS LN SANTA CLARITA, CA 91350
331 RIVER LLC 3763 HARTNEL PL CLAREMONT, CA 91711	CAMP, HERBERT E 91267 WALLUSKI LOOP ASTORIA, OR 97103	HERNANDEZ, ARTHUR 14543 TWIN PEAKS RD POWAY, CA 92064

QIN, WEN 300 LEMON CREEK DR STE A WALNUT, CA 91789	ARNAVJEET LLC 333 WHISPERING TREE AVE LAS VEGAS, NV 89183	BOATNER, JASON R 916 E BROADWAY NEEDLES, CA 92363
3653-3665 BLACKWOOD LLC 780 CHAMBERS LN STE 200 SIMI VALLEY, CA 93065	GODINEZ-OROZCO, JUAN 101 MONTEREY ST NEEDLES, CA 92363	FSMS19 LLC 1465 MORENA BLVD SAN DIEGO, CA 92110
KENWORTHY, TIMOTHY J 15824 RIMROCK RD APPLE VALLEY, CA 92307	HESTAND FAMILY TRUST 6/12/19 1578 BRONCO WAY UPLAND, CA 91786	LOERA, ELIZABETH 1021 WATERFORD CT CLARKSVILLE, TN 37040
PENWELL, CHARLES P 706 CALIFORNIA AVE NEEDLES, CA 92363	SLB LAND LLC 1001 AVENIDA PICO C418 SAN CLEMENTE, CA 92673	BENNETT, CHARLES 2208 CASA LOMA ST NEEDLES, CA 92363
DIG LLC 10049 IRON MOUNTAIN CT RANCHO CUCAMONGA, CA 91737	MEIRI ENTERPRISES LLC 8500 BURTON WAY APT 506 LOS ANGELES, CA 90048	SPIRE HOSPITALITY INC 5174 S FLAT ROCK ST AURORA, CO 80016
HOLMES, RICHARD A 15469 CLEVELAND DR FONTANA, CA 92336	WALTERS FAMILY TRUST 8/10/16 150 MORGAN DR NEEDLES, CA 92363	BROWN, NANCY L 4101 CHRISTACY WAY MARIETTA, GA 30066
ALZGHOUL FAMILY TRUST 12/22/03 510 MYRTLE AVE #209 SOUTH SAN FRANCISCO, CA 94080	REED, TERRY W 4308 EMORY WAY LIVERMORE, CA 94550	JOSE NAVARRO BAIL BONDS LLC 2809 E GAGE AVE HUNTINGTON PARK, CA 90255
MC CANN, JAMES 1009 BEACH BLVD PORT ISABEL, TX 78578	GOLAY, KECIA 609 MARINE ST SANTA MONICA, CA 90405	ACEVES FAMILY LIVING TRUST 6/20/11 9304 COOLHURST DR PICO RIVERA, CA 90660
XIE, XIAO HUI 986 EARL CT NEEDLES, CA 92363	WILDE, HENRY R FAMILY LIVING TRUST 1805 E SOUTH DR MOHAVE VALLEY, AZ 86440	MANSKER FAMILY TRUST 11/24/04 2210 17TH ST SACRAMENTO, CA 95818
COLUMBUS DRIVE LLC 5753 E SANTA ANA CANYON RD #215 ANAHEIM, CA 92807	HANNAWI, MAGED 99 ZOE LN NEEDLES, CA 92363	NAAR CAPITAL LLC 6710 N 47TH AVE GLENDALE, AZ 85301

WEAST, LISA MARIE 1503 HIGHLAND AVE NEEDLES, CA 92363	MCGRATH, DAVID JOSEPH 601 CIBOLA ST NEEDLES, CA 92363	OROZCO, JUAN GODINEZ 101 MONTEREY ST NEEDLES, CA 92363
KIDD, CHARLES 2656 S 29TH DR YUMA, AZ 85364	SHELTON, BRIAN M 516 CALIFORNIA AVE NEEDLES, CA 92363	LOFSTROM, IVAN GUSTAV 506 ACOMA ST NEEDLES, CA 92363
BLAKE, DIANNA M 7605 130TH N E KIRKLAND, WA 98033	MILLS, JAMES F 2131 WHITEWATER DR BULLHEAD CITY, AZ 86442	KARP, HARVEY 17856 VICINO WAY PACIFIC PALISADES, CA 90272
ADVM INVESTMENTS LLC 1369 ALLENFORD AVE LOS ANGELES, CA 90049	AUGUST, JED 9000 VANALDEN AVE STE 112 NORTHRIDGE, CA 91324	DU CHAINE, MATTHEW J 800 DOWNEY AVE NEEDLES, CA 92363
CALDERON, JENNIFER MARIE 609 CIBOLA ST NEEDLES, CA 92363	DAVIS, JAMES ALLEN 9671 S DIKE RD MOHAVE VALLEY, AZ 86440	HASSAN, ANUMTAA 10207 S VERMONT LOS ANGELES, CA 90044
HERNANDEZ, JEANNE A 1504 4TH ST NEEDLES, CA 92363	MARIINE INC 1311 BROOKS # H BALDWIN PARK, CA 91706	MACIEL, MARIO 7327 WHITTIER AVE WHITTIER, CA 90602
HACKETHAL, CLEMENS A 712 CALIFORNIA AVE NEEDLES, CA 92363	SANDOVAL, MARLISSA DENISE 14024 CHOGAN RD APPLE VALLEY, CA 92307	CARDIEL, RICHARD 1305 FRONT ST NEEDLES, CA 92363
HERNANDEZ, ALFREDO 1407 FRONT ST NEEDLES, CA 92363	DEL REAL, CHRISTIAN OMAR OROZCO 10843 ROSE PL ADELANTO, CA 92301	ESTEBAN, BELARMINO SANTIAGO 1468 RIPCHAK RD CORONA, CA 92879
IIP-CA 4 LP 11440 W BERNARDO CT STE 220 SAN DIEGO, CA 92127	LANPHEAR, SUSAN LIVING TRUST 05/20/1 567 CALIFORNIA AVE NEEDLES, CA 92363	MCCORKLE, BRIAN D 318 SAN CLEMENTE ST NEEDLES, CA 92363
MIDNIGHT PEAK SOLUTIONS LLC 2744 E CHAPMAN AVE ORANGE, CA 9286	DORAISWAMY, MOHAN 12924 CHARLWOOD ST CERRITOS, CA 90703	BRUMMER, LAURENA M 31055 168TH AVE S E AUBURN, WA 98002

GIEGER, KARI MARIE 608 CALIFORNIA AVE NEEDLES, CA 92363	PROA, LINDA C 120 GOODWILL ST NEEDLES, CA 92363	PITCHER, GRANT W 801 DOWNEY AVE NEEDLES, CA 92363
BHOLAT, IMRAN 10207 S VERMONT AVE LOS ANGELES, CA 90044	DAVIS, EVELYN 717 DOWNEY AVE NEEDLES, CA 92363	FOOTHILL CEDAR HOLDINGS INC 25401 CABOT RD #208 LAGUNA HILLS, CA 92653
HOOPER, JOHN SCOTT 1437 HIGHLAND AVE NEEDLES, CA 92363	YEAGER, JOSEPH A - EST OF 1356 LARCHWOOD ST NEEDLES, CA 92363	SANDERS, STEVEN GLEN 401 ARMY RD NEEDLES, CA 92363
JACKSON, DARREN MICHAEL 2565 S BEAGLEY CIR WEST VALLEY CITY, UT 84128	CHANDLER JOANN L TRUST 9/30.85 18909 MUSKRAT AVE ADELANTO, CA 92301	ROCCO, LYDIA 1066 NORTHVIEW DR BEAUMONT, CA 92223
ARMENTA, JACK J 1116 E 26TH ST SAN BERNARDINO, CA 92404	HAYDUK, SCOTT ALLEN 240 VIVIAN LN HEMET, CA 92543	ERAZO, LEXI 806 CINNAMON LN DUARTE, CA 91010
PANKEY, DANA TR 2925 SEA CHANNEL DR SEABROOK, TX 77586	110 S L ST TRUST 1712 PIONEER AVE #1496 CHEYENNE, WY 82001	EVANS FAMILY TRUST 9/1/10 230 MUSTANG LN NEEDLES, CA 92363
DANIEL FAMILY TRUST 8-16-93 - EST OF 623 CIBOLA ST NEEDLES, CA 92363	DORIA, FRANK R 1228 RIVERVIEW LN NEEDLES, CA 92363	MARQUEZ, EVER MOISES 372 TASMAN AVE POMONA, CA 91767
O'BRION, SHAWN 308 CHESTNUT ST NEEDLES, CA 92363	CAMPBELL, JAMES B 1406 BAILEY AVE STE G NEEDLES, CA 92363	AARABI, MOHAMMADREZA 5330 E HONEYWOOD LN ANAHEIM, CA 92807
DE ABRAVANEL, JUAN BERDUGO 1322 S GERHART AVE COMMERCE, CA 90022	NEWELL, MICHELLE M 806 MARKET ST NEEDLES, CA 92363	LOPEZ, RUTH ARLENE & ROBERT J LIV TR 420 E ST NEEDLES, CA 92363
RIVERA, ART 3807 W SIERRA HWY #4484 ACTON, CA 93510	LINEBERRY, DAVID A 2408 W BROADWAY NEEDLES, CA 92363	BOATNER, JASON 916 E BROADWAY ST NEEDLES, CA 92363

A+ AUTOCARE, INC 2408 NEEDLES HWY NEEDLES, CA 92363	RODRIGUEZ-LYON, VICTORIA L 2312 BUSH ST NEEDLES, CA 92363	PELICAN PLACE PROPERTIES LLC 10005 DENNI ST CYPRESS, CA 90630
BILLY B'S ARRIVE N' DRIVE BOAT & RV 2299 LINKS PL ERIE, CO 80516	DELEON-MELVIN, CYNTHIA KAYE 207 MONTEREY ST NEEDLES, CA 92363	TRUJILLO FAMILY TRUST 3/22/23 2352 NICKLAUS DR OCEANSIDE, CA 92056
OVENS, PETER 229 MONTEREY ST NEEDLES, CA 92363	BOOM, RUBY A - EST OF 700 SAN CLEMENTE ST NEEDLES, CA 92363	BRAYBOY FAMILY TRUST 9/19/17 5403 E SPRING ST LONG BEACH, CA 90808
PERRY, JOHN J III 216 SPRUCE ST NEEDLES, CA 92363	PARK, R & T JOINT LIV TR 2-17-98 1870 COTTONWOOD LN MOHAVE VALLEY, AZ 86440	UDDIN, SYED S 6915 DUNBARTON DR SUGAR LAND, TX 77479
BOWMAN, ETHEL MAE TRUST 6086 BARRY DR CYPRESS, CA 90630	WILLIS, JACK LIVING TRUST 5/24/16 16040 JAMIE LN #4 FONTANA, CA 92336	LASWELL, JOHN W 215 S K ST NEEDLES, CA 92363
HERNANDEZ, ZENAIDA GARCIA 515 CALIFORNIA AVE NEEDLES, CA 92363	MILLS, CHRISTOPHER ROBERT 405 DESNOK ST NEEDLES, CA 92363	ARABI, REZA 5330 E HONEYWOOD LN ANAHEIM, CA 92807
LUCAS, GREGORY 805 N PENNSYLVANIA LN GLENDORA, CA 91741	SHAB EL- AAWAR TRUST 08/15/91 3998 MOUNTAIN VIEW AVE SAN BERNARDINO, CA 92405	CHAVEZ, LESLY ARACELY 633 CIBOLA ST NEEDLES, CA 92363
LOWE, DAVID 6718 W BROOK DR GOLDEN VALLEY, AZ 86413	HAMILTON FAMILY TRUST 5/13/08 613 B ST NEEDLES, CA 92363	NAKOUD, SAM 12740 YORKSHIRE DR APPLE VALLEY, CA 92308
ZIMMERMAN, ROY EMILE 202 SPRUCE ST NEEDLES, CA 92363	HAMILTON, ZOE LINDA 615 ACOMA ST NEEDLES, CA 92363	WOLFE, DAVID P 2205 NEEDLES HWY NEEDLES, CA 92363
VERBANIC, EMIL 1440 PINE AVE HEMET, CA 92543	BRAVO, GONZALO DARIUS 1417 HIGHLAND AVE NEEDLES, CA 92363	LEONARD, DAVID 710 VALLEY AVE NEEDLES, CA 92363

DURFEE, MARK LEWIS 2159 PASEO DEL REY ST NEEDLES, CA 92363	ANAYA, CODIE LYNETT 9999 FOOTHILL BLVD #112 RANCHO CUCAMONGA, CA 91730	SHAVER, KENNETH J 1357 LARCHWOOD ST NEEDLES, CA 92363
SEAPOINT CONSULTING LLC 19002 POPPY HILL CIR HUNTINGTON BEACH, CA 92648	STORWISE NEEDLES LLC 31225 LA BAYA DR #206 WEST VILLAGE, CA 91362	JUSTICE, JOHN-HENRY 2975 WALLACE LAKE RD MILTON, FL 32571
STICKYCHICKEN INC 1411 CREEKSIDE DR #17 WALNUT CREEK, CA 94596	WASSERMAN REVOCABLE TRUST 2020 EL MONTE ST NEEDLES, CA 92363	CHURCH OF GOD IN CHRIST INC 1433 RIVER NEEDLES, CA 92363
LYMORA LLC 1401 BAILEY AVE NEEDLES, CA 92363	CLARK, JAMES E 808 BUSH ST NEEDLES, CA 92363	GO GREEN PROPERTIES LLC 13111 BROOKS DR #H BALDWIN PARK, CA 91706
BILLY B'S ARRIVE N DRIVE BOAT & RV S 2299 LINKS PL ERIE, CO 80516	VANDIVOT, STEVEN MARK 460 F ST NEEDLES, CA 92363	KEMP, KENNETH J 475 W BASELINE RD SAN DIMAS, CA 91773
BOLEY FAMILY TRUST 1872 CORONADO DR BULLHEAD CITY, AZ 86442	DEER PARK DEVELOPMENT CORP 42171 BIG BEAR BLVD 6848-129 BIG BEAR LAKE, CA 92315	NELSON, JOHN W JR LIVING TRUST 8/26 1385 SW KALAMA LOOP OAK HARBOR, WA 98277
RODRIGUEZ, MARTIN S 809 'R' ST NEEDLES, CA 92363	GHANEM PROPERTIES LLC 32118 PASEO ADELANTO STE 6AR SAN JUAN CAPISTRANO, CA 92675	ROCKWOOD, THEODORE 1370 SANTA FE CIR NEEDLES, CA 92363
RESENDEZ, SERGIO ADOLFO 768 E 48TH ST LOS ANGELES, CA 90011	SET FREE CHRISTIAN FELLOWSHIP YUCAIP 13700 CALIMESA BLVD CALIMESA, CA 92399	ANDRADE FINANCIAL 2060 E ROUTE 66 AVE #101 GLENDORA, CA 91740
GILMER, AARON G 620 B ST NEEDLES, CA 92363	EL AAWAR, SHAB TRUST 3998 MOUNTAIN VIEW AVE SAN BERNARDINO, CA 92405	SAICILINO LLC 7060 ADAMS AVE COLTON, CA 92324
DICKSON, JEAN B 731 WHITTIER AVE CLOVIS, CA 93611	HARDINGE, HARRY M 1507 WASHINGTON ST NEEDLES, CA 92363	WASEEM PROPERTIES LLC 32118 PASEO ADELANTO 6AR SAN JUAN CAPISTRANO, CA 92675

MMLD FAMILY TRUST 11614 PAVIA DR ALTA LOMA, CA 91701	MORA, RICHARD A 17960 CONTADOR DR ROWLAND HEIGHTS, CA 91748	NEPTUNE PROPERTIES INC 200 PIER AVE HERMOSA BEACH, CA 90254
SATO, SONYA MARIA 25651 INDIAN HILL LN UNIT H LAGUNA HILLS, CA 92653	HERNANDEZ, RUBEN G 310 MONTEREY ST NEEDLES, CA 92363	MC DONALD FAMILY TRUST 10244 S EMPIRE RD MOHAVE VALLEY, AZ 86440
BOUDREAU LIVING TRUST 9330 BALBOA AVE SAN DIEGO, CA 92123	HOUSES 4 U CORPORATION INC 11606 ANDERSON ST LOMA LINDA, CA 92354	LIMON, INEZ 306 CHESTNUT ST NEEDLES, CA 92363
SWAIN, GORDON S & SUSAN D REV LIV TR 207 WALNUT ST NEEDLES, CA 92363	BROWN, JESSE DEAN 1641 HIGHWAY 95 BULLHEAD CITY, AZ 86442	VLAISAVLJEVIC, DAVID 30050 TREVYELON ST CASTAIC, CA 91384
ANDERSON, DONALD R 640 CALIFORNIA NEEDLES, CA 92363	WEART FAMILY TRUST 7/15/11 514 CALIFORNIA AVE NEEDLES, CA 92363	MCCORKLE, BARBARA LIVING TR 315 WALNUT ST NEEDLES, CA 92363
MEJIA, JOHN M 6435 PALM AVE SAN BERNARDINO, CA 92407	BROMILOW, JOHN W 136 SAN LUIS ST NEEDLES, CA 92363	KELLER, JERRY C 100 ALISO ST NEEDLES, CA 92363
CALLAWAY, DENNIS 327 CHESTNUT NEEDLES, CA 92363	FACKLAM, RONDA L 214 WALNUT ST NEEDLES, CA 92363	DIELS, RICHARD R 301 WALNUT ST NEEDLES, CA 92363
THORP, LONNY 20405 LARITA DR E BONNEY LAKE, WA 98391	BROWDER, ROBERT & JUDITH TR 304 LONGDEN ARROYO GRANDE, CA 93420	WEEKLEY, TREVOR C 2044 CORTEZ ST NEEDLES, CA 92363
ZAMORA, TOMAS 1954 E 80 SOUTH CIR ST. GEORGE, UT 84790	REYES, JUAN FRANCISCO 217 CHESTNUT ST NEEDLES, CA 92363	COLE, NOAH MORGAN 621 B ST NEEDLES, CA 92363
MC DONALD, KELLIS W TR 1490 5TH ST NEEDLES, CA 92363	GREENS NEEDLES LLC 16530 BAKE PKWY STE 200 IRVINE, CA 92618	CROCKETT, REBECCA 215 S K ST NEEDLES, CA 92363

DORIA, FRANK 1228 RIVER LN NEEDLES, CA 92363	HALL FAMILY TRUST 10/15/09 714 VALLEY AVE NEEDLES, CA 92363	MC KEEVER, DANIEL J 27511 BRUCITE RD BARSTOW, CA 92311
JACKSON, LEON H 2004 RACE ST NEEDLES, CA 92363	BOLEY FAMILY TRUST 04/02/97 1872 CORONADO DR BULLHEAD CITY, AZ 86442	HCOVA NEEDLES LLC 420 N MAIN ST MONTGOMERY, IL 60538
LODGING VENTURES LLC 3531 TORRANCE BLVD TORRANCE, CA 90503	ZAHNTER, RUSTY D 14 CRESTVIEW DR NEEDLES, CA 92363	FORGE 1031 LLC 42311 VISTA MONTANA CT TEMECULA, CA 92590
SHEARER, ALBERT 230 W HILLSIDE ST MESA, AZ 85201	ANDRADE, RITA MARIE 2110 CASA LINDA ST NEEDLES, CA 92363	GREENS INV 7 LLC 16530 BAKE PKWY STE 200 IRVINE, CA 92618
PALMER, WARREN A TR 1 CRESTVIEW DR NEEDLES, CA 92363	STOECKIG, PATRICIA W -EST OF 2006 FOOTHILL DR VISTA, CA 92084	NEEDLES ELKS LODGE BLDG ASSN 1000 LILY HILL DR NEEDLES, CA 92363

Appendix A Environmental Commitments Record

In order to be sure that all of the environmental measures identified in this document are executed at the appropriate times, the following mitigation program (as articulated on the proposed Environmental Commitments Record [ECR] which follows) would be implemented. During project design, avoidance, minimization, and/or mitigation measures will be incorporated into the project's final plans, specifications, and cost estimates, as appropriate. All permits will be obtained prior to implementation of the project. During construction, environmental and construction/engineering staff will ensure that the commitments contained in this ECR are fulfilled. Following construction and appropriate phases of project delivery, long-term mitigation, maintenance and monitoring will take place, as applicable. As the following ECR is a draft, some fields have not been completed, and will be filled out as each of the measures is implemented. Note: Some measures may apply to more than one resource area. Duplicative or redundant measures have not been included in this ECR.

Permit Type	Agency	Date Received	Expiration	Notes
1602	California Department of Fish & Wildlife			
WDR	Regional Water Quality Control Board			

Date of ECR: March 2026

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

ENVIRONMENTAL COMMITMENTS RECORD
(I-40 Bridge Scour Project)

08-SBd-40
PM R139.0/R152.2

EA 08-1M420
PN 0821000103
Generalist: Marco Estrada
ECL:TBD

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	Mitigation for significant impacts under CEQA?	
							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.	**2-16**	Initial Study/ Mitigated Negative Declaration (ISMND)	District Cultural Studies/ District Design/ Resident	Design/ Construction					X

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							Date / Initials	YES	NO
		December 2025	Engineer/ Contractor						
CUL-2: In the event that human remains are found, the county coroner shall be notified and ALL construction activities within 50 feet of the discovery shall stop. Pursuant to Public Resources Code 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 Descendent (MLD). The person who discovered the remains will contact the District 8 Division of Environmental Planning; Andrew Walters, DEBC:	2-16	ISMND December 2025	District Cultural Studies/ District Design/ Resident Engineer/ Contractor	Final Design, Construction					X

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							Date / Initials	YES	NO
(909)383-2647and Gary Jones, DNAC: (909)383-7505. Further provisions of PRC 5097.98 are to be followed as applicable.									
BIOLOGICAL RESOURCES									
BIO-General-1 Equipment Staging, Storing & Borrow Sites. Caltrans will confine all equipment maintenance, storage, and parking during construction activities to the designated construction area or to previously disturbed graded or paved areas, or level areas where grading and vegetation clearing are not required and that are not habitat for listed species, as	2-10	Natural Environment Study-Minimal Impacts (NESMI) November 2025	District Design / District Environmental Planning / Resident Engineer / Contractor	Final Design, Construction					X

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determined in coordination with the Approved Biologist (BIO-General 8). All staging areas would be located at least 150 feet from sensitive habitat areas, including streams/drainages and other aquatic habitat, since storage will include fuels, lubricants, and solvents.									
BIO-General-4a Preconstruction Invertebrate Species Survey. A preconstruction monarch butterfly survey must be conducted by a contractor-supplied biologist no more than 1 week prior to project	2-10	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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activities within the Biological Study Area. If a monarch butterfly, butterfly larva, or chrysalis is located, the Resident Engineer and Caltrans biologist must be contacted and additional measures and/or agency coordination may be required.									
BIO-General-4b Pre-construction Desert Tortoise Surveys. Pre-construction surveys for desert tortoise must be conducted by a qualified contractor-supplied biologist within the Project Impact Area and any staging areas within	2-10	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction					X

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							Date / Initials	YES	NO
7 days prior to project activities and following a habitat suitability assessment. If one of the species listed above or other special status species is located, the Resident Engineer and Caltrans biologist must be contacted and additional measures and/or agency coordination may be required.									
BIO-General-4c Preconstruction Desert Bighorn Sheep Surveys. A preconstruction desert bighorn sheep survey consistent with CDFW, USFWS, and BLM guidelines	2-10	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction					X

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							Date / Initials	YES	NO
must be conducted by a qualified contractor-supplied biologist no more than 3 days prior to project activities within Whale Mountain Wash and following a habitat assessment. If a desert bighorn sheep individual or sign is located, the Resident Engineer and Caltrans biologist must be contacted and additional measures and/or agency coordination may be required.									
BIO-General-6 Species Avoidance. If during project activities a desert tortoise is discovered within the project	2-10	NESMI November 2025	District Design / District Biologist / Resident	Construction					X

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							Date / Initials	YES	NO
site, all construction activities must stop within 50 feet of the discovery, and the Caltrans biologist and Resident Engineer must be notified. Coordination with CDFW and USFWS may be required prior to restarting activities.			Engineer / Contractor						
BIO-General-7 Worker Environmental Awareness Program (WEAP). A contractor-supplied biologist must present a Caltrans-approved biological resource information program/WEAP for special-status mammal, avian, reptile, invertebrate and rare plants prior to project	2-11	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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							Date / Initials	YES	NO
activities, to all personnel that will be present within the project limits for longer than 30 minutes at any given time. Caltrans will require all construction personnel to participate in the WEAP training prior to participating in work activities. The training will be led by an approved biologist and delivered to all construction personnel and new field-based personnel before engaging in construction activities.									
BIO-General-8 Biological Monitor. A qualified contractor-supplied biologist	2-11	NESMI November 2025	District Design / District Biologist /	Pre-Construction,					X

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							Date / Initials	YES	NO
must monitor project activities periodically as they progress throughout the length of the project limits to ensure that measures intended to protect desert bighorn sheep, desert tortoise, Gila monster, Crotch's bumble bee, monarch butterfly, nesting birds, and natural habitat during construction are being implemented and documented. This will include ensuring that work equipment, vehicles, and personnel do not enter habitat areas, and stopping work if a desert bighorn sheep, desert tortoise			Resident Engineer / Contractor	Construction					

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							Date / Initials	YES	NO
or Gila monster enters the work area.									
BIO-General-9 Environmentally Sensitve Area. To address potential impacts to desert bighorn sheep, desert tortoise, Gila monster, Crotch's bumble bee, and monarch butterfly habitat, and rare plant environmentally sensitive areas, delineate the habitat areas for these special-status animal and plant species as an ESA as shown on the plans, as described in the specifications, and/or as	2-11	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Design, Pre-Construction, Construction					X

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							Date / Initials	YES	NO
determined by the designated biologist.									
BIO-General-10 Environmentally Sensitive Area (ESA) Fence Monitoring. Integrity inspections of ESA fencing and desert tortoise temporary fencing and enclosures must occur throughout the duration of the project, 3 days prior to commencing project activities and weekly during project activities. If during construction the fence fails, work must stop until it is repaired, and the qualified	2-11	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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							Date / Initials	YES	NO
biologist inspects (and clears) the job site.									
BIO-General-11 Environmentally Sensitive Area (ESA) Fence Removal. All fencing must be removed as a last order of work. During removal, a qualified biologist must be present.	2-11	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Post-Construction					X
BIO-General-12 Animal Entrapment. To prevent inadvertent entrapment of desert tortoise during project activities, all excavated steep-walled holes or trenches more than 6 inches deep must be	2-11	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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covered at the close of each working day by plywood (or similar material) or provided with one or more escape ramps constructed of earth fill or wooden planks. At the beginning of each working day, all such holes or trenches must be inspected to ensure no animals have been trapped during the previous night. Before such holes or trenches are filled, they must be thoroughly inspected for trapped animals. Trapped animals must be released by the qualified contractor-supplied biologist.									

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BIO-Plant-2 Rare Plant Pre-Construction Surveys. Within 1 week prior to construction, a preconstruction survey must be conducted by a contractor-supplied biologist for special-status plants within the Project Impact Area. Any rare plant species identified must be flagged for visual identification to construction personnel for work avoidance. Rare plant species detected that feature multiple plants in a single location must be fenced with temporary high-visibility fencing.	2-12	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction					X

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BIO-Reptile-1 Equipment Flagging. Project personnel must attach surveyor flagging tape to a conspicuous place on each piece of equipment to remind the operator to check under the equipment (including all vehicles, i.e., cars and trucks) for special status reptile species desert tortoise before operating equipment at any time.	2-12	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X
BIO-Reptile-2 Trash/Predation. Caltrans must implement measures to reduce the attractiveness of job sites to common raven, and other predators and	2-12	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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scavengers by controlling trash and educating workers.									
BIO-Reptile-3 Temporary Demarcation. Temporary demarcation in the form of temporary desert tortoise fencing must be installed following the most recent USFWS guidelines for construction fencing, to delineate both sides of the PIA at the Whale Mountain Wash RSP work location (Bridge No. 54-0668L and 54-0558R; PM 152.1/152.2), with a 50-foot buffer as shown on the plans and/or described in the specifications, to exclude	2-12	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Design, Pre-Construction					X

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desert tortoise from these areas. Temporary desert tortoise fencing must also be installed at any equipment staging, storage, and borrow sites prior to construction, as shown on the plans, to exclude desert tortoise from these areas. All temporary demarcation materials must be removed once construction has been completed.									
BIO-Reptile-4 Rock Slope Protection. To prevent trapping of desert tortoise, interstitial spaces within rock slope protection must be	2-12	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Construction					X

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partially filled with concrete grout or sand.									
BIO-Reptile-5 Special Status Reptile Survey. Prior to any construction activities, known desert tortoise habitat in the Biological Study Area, will be surveyed. Any special status reptile habitat area determined to be active and within 500 feet from the PIA shall be evaluated for breeding status using established CDFW Survey Protocols. If special status reptile individuals are detected during the preconstruction surveys within	2-12	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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500 feet of the PIA, construction activities shall be avoided in this area during the optimal survey period (April 15 to July 15). To avoid excessive delays to the project when special status reptiles are active near a project location, work at other project locations should be done first; any site near an active special status reptile area should be done last. The special status reptile presence/ absence survey should be conducted when air temperature is between 77 F and 95 F. {Tollestrup 1976; USFWS 1985, 1998). Surveys									

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must be conducted when the air temperature falls within the optimal range (CDFW 2019).									
BIO-Avian-1 Pre-Construction Nesting Bird Survey. If project activities cannot avoid the nesting bird season, February 1 - September 30, then preconstruction nesting bird surveys shall be conducted by a qualified contractor-supplied biologist in areas of suitable habitat within the project limits and up to the limit of the BSA, no more than 3 days prior to construction to locate and avoid nesting birds. If an	2-13	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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							Date / Initials	YES	NO
active avian nest is located, a no-construction buffer (100 feet for non-passerine, 300 feet for passerine, and 500 feet for raptors) shall be established and monitored by a qualified contractor-supplied biologist.									
BIO-Avian-2 Pre-Construction Burrowing Owl Survey. Two burrowing owl preconstruction surveys must be performed by a qualified contractor-supplied biologist: one survey 14-30 days prior to project activities, and one survey 24 hours prior to project activities. The	2-13	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction, Construction					X

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EA 08-1M420
PN 0821000103
Generalist: Marco Estrada
ECL:TBD

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surveys will be conducted within the area of suitable burrowing owl habitat within State right-of-way and within the project limits. If pre-construction surveys confirm occupied burrowing owl habitat within this area, the qualified contractor-supplied biologist will coordinate with CDFW on additional measures that may be needed to ensure that no take of burrowing owl occurs.									
BIO-Arthropod-1 Rare Insect Host Plant Preconstruction Clearance Survey, Flagging, and	2-13	NESMI November 2025	District Design / District Biologist / Resident	Pre-Construction,					X

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Fencing. No more than 1 week prior to project activities, a contractor-supplied biologist must perform a preconstruction survey within the PIA for rare insect host plants, including but not necessarily limited to milkweed (Funastrum sp. and Asc/epias sp.). Should any rare insect host plants be found, the Resident Engineer and Caltrans biologist must be contacted, and the host plants must be flagged by the contactor-supplied biologist for visual identification to construction personnel for work avoidance. Should			Engineer / Contractor	Construction					

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							Date / Initials	YES	NO
multiple plants in a single location be found, the groupings must be fenced with Environmentally Sensitive Area (ESA) temporary fencing.									
BIO-General-PSM-1 Agency Notification and Reporting Requirements. Any listed species within or near the job site, or as specified in BIO-General-6, found alive, injured, or dead during the implementation of the Project must be immediately reported to the Resident Engineer and Caltrans Biologist. The Caltrans Biologist must then	2-14	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Construction					X

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							Date / Initials	YES	NO
notify the Resource Agencies. Veterinary treatment and/or final deposition must follow Resource Agencies' approval. Monitoring reports must include WEAP Training and be submitted to the Resources Agencies on a timeframe to be determined.									
BIO-General-PSM-2 Environmentally Sensitive Areas and Ground Disturbance. No ground disturbing or fill activity of any type will be permitted within environmentally sensitive areas outside the Project footprint. All construction	2-14	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Construction					X

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							Date / Initials	YES	NO
equipment shall be operated in a manner to prevent accidental damage to nearby preserved areas outside the PIA. No structure of any kind, or incidental storage of equipment or supplies, will be allowed within these protected areas. Where appropriate, temporary high visibility fence will be installed at the environmentally sensitive area boundary to prevent accidental deposition of fill material in areas where vegetation is adjacent to planned ground disturbing activities.									

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							Date / Initials	YES	NO
BIO-Natural Community-PSM-1 Habitat Restoration. On-site habitat restoration for temporary impacts for Sensitive Natural Communities through revegetation and reseeding with vegetation native to the impacted area immediately following completion of construction activities, or with written approval from CDFW and/or USFWS, at the beginning of the next growing season after project completion.	2-14	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Post-Construction					X

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							Date / Initials	YES	NO
BIO-Bat-1-PSM-12 Bat Preconstruction Surveys. Prior to work activities, a pre-construction survey at the Whale Mountain Wash bridges (Bridge No. 54-0668L and 54-0558R; PM 152.1/152.2), and an appropriate survey buffer shall be conducted for the presence of bat roosts by a qualified contractor-supplied bat biologist. Initial surveys are recommended to be conducted at least 6 months prior to the initiation of work within or adjacent to these bridges, ideally during the maternity season (typically	2-14	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Pre-Construction					X

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							Date / Initials	YES	NO
April 1 to August 31), to allow time to prepare mitigation, and/or exclusion plans if needed in accordance with CDFW guidelines. If the pre-construction survey determines that no active roosts are present, then work activities shall commence within two weeks following the pre-construction survey.									
BIO-Bat-2-PSM-13 Work Restriction Hours. Work activities should be restricted to daylight hours at work locations with suitable bat habitat (Whale Mountain Wash bridges (Bridge No. 54-	2-14	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Construction					X

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							Date / Initials	YES	NO
0668L and 54-0558R; PM 152.1 /152.2). This would reduce the potential of direct or indirect impacts to bat species that may be foraging in the vicinity of the BSA. Should work activities be required at night, night lighting should be focused on the direct area of work.									
BIO-Waters-1. Habitat enhancement for temporary impacts, which entails exotic and/or invasive plant control immediately following the impact.	2-15	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Construction				X	

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							Date / Initials	YES	NO
BIO-Waters-2. On-site habitat restoration for temporary impacts for native communities through revegetation and reseeding with vegetation native to the impacted area immediately following completion of maintenance activities, or, with written approval from CDFW, at the beginning of the next growing season after project completion.	2-15	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor					X	
BIO-Waters-3. Permanent impacts will be mitigated for and decided upon with	2-15	NESMI November 2025	District Design / District Biologist / Resident	Design				X	

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							Date / Initials	YES	NO
coordination from regulatory agencies.			Engineer / Contractor						
BIO-Waters-4. Any additional permanent impacts to jurisdictional areas will be mitigated with appropriate mitigation measures to be identified during the regulatory permitting process.	2-15	NESMI November 2025	District Design / District Biologist / Resident Engineer / Contractor	Permitting Process				X	
TRANSPORTATION									
TRA-1: Prior to construction, a TMP will be prepared to minimize potential impacts on emergency services and commuters during construction.	2-30	ISMND December 2025	District Design / District Traffic Management / District Environmental Planning / Resident	Final Design, Construction					X

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							Date / Initials	YES	NO
			Engineer / Contractor						
GHG 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**.**	2-20	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction					X
GHG-2: The Project will maintain equipment in proper tune and working conditions.	2-20	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction					X

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							Date / Initials	YES	NO
HAZARDS AND HAZARDOUS WASTE									
HAZ-1: Project will be performed in accordance with Caltrans Standard Special Provision Section 6-1.03B Local Material.	2-23	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction	SSP 6-1.03B				X
HAZ-2: Project will be performed in accordance with Caltrans Standard Special Provision Section 14-11.14 Treated Wood Waste.	2-23	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction	SSP 14-11.14				X
HAZ-3: Project will be performed in accordance with Caltrans Standard Special Provision Section 7-1.02k(6)(j)(ii) for submittal of	2-23	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction	SSP 7-1.02k (6)(j)(ii)				X

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							Date / Initials	YES	NO
lead compliance plan as an information submittal.									
HAZ-4: Project will be performed in accordance with Caltrans Standard Special Provision Section 7-1.02k(6)(j)(iii) for unregulated earth materials.	2-23	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction	SSP 7-1.02k (6)(j)(iii)				X
HAZ-5: Project will be performed in accordance with Caltrans Standard Specifications Section 14-11.15 for specifications for disposing of electrical equipment containing hazardous waste.	2-24	ISMND December 2025	District Design / Resident Engineer / Contractor	Final Design, Construction	SS 14-11.15				X

Appendix B List of Technical Studies

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

Caltrans, 2025a. Landscape Architecture Scoping Questionnaire to Determine Visual Impact Assessment Level. July.

Caltrans, 2025b. Air Quality Review Technical Memorandum. July.

Caltrans, 2025c. Natural Environment Study, Minimal Impacts [NES(MI)]. November.

Caltrans, 2025d. Section 106 Compliance-Screened Undertaking Memorandum. October.

Caltrans, 2025e. Noise Memorandum for EA 1M420. June.

Caltrans, 2025f. Initial Site Assessment (ISA) Checklist. December.