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DEPARTMENT OF FISH AND WILDLIFE

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July 6, 2026

Sunny Saroa
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Subject: Mitigated Negative Declaration for the SR-241 SR-133 Multi Asset Project 12-0T270, SCH No. 2026050820, Orange County, CA

Dear Sunny Saroa:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the California Department of Transportation (Caltrans) for the I SR-241 SR-133 Multi Asset Project 12-0T270 (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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

CDFW Role

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

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

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efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*) or the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program (Fish & G. Code, § 2800 *et seq.*). While CDFW acknowledges that Caltrans is not a signatory to the NCCP program, portions of the Project occur within the boundaries of the County of Orange Central and Coastal Subregion (NCCP)/Habitat Conservation Plan (HCP) as well as projects associated with the Orange County Transportation Authority (OCTA) Measure 2 (M2) NCCP/HCP. Project activities occurring outside of existing Caltrans right-of-way should be evaluated for consistency with applicable HCP conservation objectives and biological resource protection measures.

Project Description Summary

Proponent: California Department of Transportation (Caltrans) District 12

Objective: The proposed Project will rehabilitate pavement, restore drainage systems, and enhance roadway safety and mobility along State Route 133 (SR-133) and State Route 241 (SR-241) in Orange County, California.

Location: The Project is located in the cities of Irvine, Lake Forest, Mission Viejo, Rancho Santa Margarita in Orange County, California. The Project on SR-241 extends from Post Mile (PM) 15. (Latitude (Lat) 33.598162, Longitude (Long) -117.613066) to PM 27.8 (Lat 33.724276, Long -117.719252) and SR-133 from PM 12.8 (Lat 33.706733, Long -117.725714) to PM 13.6 (Lat 33.717261, Long -117.720656).

Biological Setting: The Project is located within the Canada Gobernadora, El Toro, and Santiago Peak 7.5- minute USGS quadrangle maps. The elevation ranges between 540-1070 feet above mean sea level. Terrain in the BSA is flat to gentle rolling slopes up to the foothills

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

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of the Santa Ana Mountains. The area has a Mediterranean climate with hot and dry summers, and relatively cooler and wetter winters. Precipitation usually occurs as rain and is generally in the winter and spring months (November-April). The Project lies within both developed and undeveloped areas of Orange County including housing and commercial developments, infrastructure and utility elements, roadways, recreational and wilderness parks, medical offices, public service buildings, reservoirs, community buildings, schools, and agriculture fields. Wilderness parks include O'Neill Regional Park, Whiting Ranch Wilderness Park, Orange County Great Park, and Irvine Ranch Open Space. The Project is adjacent to the Upper Oso Reservoir and several waterways including West Fork Canada Chaquita, Arroyo Trabuco, Tijeras Creek, Oso Creek, Aliso Creek, Serrano Creek, Borrego Canyon Wash, Agua Chinon Wash, Bee Canyon Wash, and several unnamed washes. Vegetation types throughout the Project area include coastal sage scrub, riparian, annual grassland, farmland, ornamental, and ruderal vegetation.

A general biology survey was completed in January 2026; however, a species observed list was not provided. Special status wildlife species that have the potential to occur within the Project area include, but is not limited to, arroyo toad (*Anaxyrus californicus*; Federally Endangered (FE)), western spadefoot (*Spea hammondi*; California Species of Special Concern (SSC), Federally Proposed Threatened (FPT)), grasshopper sparrow (*Ammodramus savannarum*; SSC), golden eagle (*Aquila chrysaetos*; California Fully Protected (SFP), Federally Fully Protected (FP)), long-eared owl (*Asio otus*; SSC), Cooper's hawk (*Astur cooperii*; California Watch List (WL)), burrowing owl (*Athene cunicularia*; California Candidate Species (SCE)), ferruginous hawk (*Buteo regalis*; WL), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; SSC), white-tailed kite (*Elanus leucurus*; SFP), California horned lark (*Eremophila alpestris actia*; WL), yellow-breasted chat (*Icteria virens*; SSC), coastal California gnatcatcher (*Poliophtila californica californica*; (FT, SSC), yellow warbler (*Setophaga petechia*; SSC), least Bell's vireo (*Vireo bellii pusillus*; FE, SE), San Diego fairy shrimp (*Branchinecta sandiegonensis*; FE, SSC), Riverside fairy shrimp (*Streptocephalus woottoni*; FE, SSC), Crotch's bumble bee (*Bombus crotchii*; SCE), Monarch butterfly (*Danaus plexippus*; California Species of Greatest Conservation Need, FT), western mastiff bat (*Eumops perotis californicus*; SSC), western red bat (*Lasiurus frantzii*; SSC), San Diego desert woodrat (*Neotoma lepida intermedia*; SSC), southern grasshopper mouse (*Onychomys torridus ramona*; SSC), southwestern pond turtle (*Actinemys pallida*; SSC, Federally Proposed Threatened), Southern California legless lizard (*Anniella stebbinsi*; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC), red-diamond rattlesnake (*Crotalus ruber*; SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC), coast patch-nosed snake (*Salvadora hexalepis virgulata*; SSC), two-striped gartersnake (*Thamnophis hammondi*; SSC), and American badger (*Taxidea taxus*; SSC). Special status plant species that have the potential to occur within the Project area include thread-leaved brodiaea (*Brodiaea filifolia*; SE, FE, California Native Plant Society Rare Plant Rank (CNPS) 1B.1), intermediate monardella (*Monardella hypoleuca ssp. intermedia*; CNPS 1B.3), Allen's pentachaeta (*Pentachaeta aurea ssp. allenii*; CNPS 1B.1), and chaparral ragwort (*Senecio aphanactis*; CNPS 1B.2).

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COMMENTS AND RECOMMENDATIONS

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

COMMENT #1: Wildlife Connectivity

Issue: The Project may impact wildlife connectivity.

Specific impact: Culvert modifications may have the potential to significantly impact wildlife movement. Modification or replacement of culverts could either adversely affect existing connectivity or fail to improve poor connectivity.

Why impact would occur: The ecological footprint of roads extends beyond its physical footprint due to road mortality, habitat fragmentation, and indirect impacts (Spencer et al, 2010). Limiting movement and passage of species can lead to the reduction of genetic fitness in populations making them more vulnerable to changing or extreme conditions, the inability for populations to recolonize habitat after disturbance events (e.g. fires, floods, droughts), the loss of resident wildlife populations by altered community structure (e.g. species composition, distribution), and/or partial or complete loss of populations of migrant species due to blocked access to critical habitats (Caltrans, 2009; Haddad et al., 2015; Nicholson et al., 2006). Studies indicate that due to climate change, connectivity to thermal refugia is increasingly becoming more important for conserving populations as well as genetic diversity (Morelli et al., 2017; Chen et al., 2011). Therefore, reducing culvert size, increasing culvert length, and preserving current culvert size, location, and invert without wildlife movement analyses may preserve existing barriers where an opportunity is present to design structures that allow for improved movement conditions.

The Project location includes CDFW's Region 5 priority Barrier ID number W245, SR-241 Loma Ridge on SR-241 from PM 27.5-27.8. This Project is also approximately four miles south of the State Route 241 Wildlife Protection Fence Project (completed in 2016). Culverts within this Project corridor may currently function as wildlife movement pathways. Modification or replacement of these structures could either adversely affect existing connectivity or present opportunities to improve connectivity and reduce wildlife-vehicle collisions. However, the environmental document does not include an analysis of these potential effects. Therefore, the Caltrans analysis should include a more in-depth analysis of connectivity on each of the culverts the Project will impact.

Evidence impact may be significant: Fish and Game Code section 1955 states that California wildlife is losing the ability to move and migrate as habitat conversion and built infrastructure disrupt species habitat and cut off migration corridors. It also states that habitat connectivity and wildlife migratory corridors are essential to the continued survival of many California

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species. Their importance will only grow as California wildlife increasingly migrates in response to climate change and resulting shifts in habitat suitability.

It is also the policy of the state to promote the voluntary protection of wildlife corridors and habitat strongholds in order to enhance the resiliency of wildlife and their habitats to climate change, protect biodiversity, and allow for the migration and movement of species by providing connectivity between habitat lands. In order to further these goals, it is the policy of the state to encourage, wherever feasible and practicable, voluntary steps to protect the functioning of wildlife corridors through various means, as applicable and to the extent feasible and practicable (FGC § 1930.5(c)(1)). The Project also lies within a connectivity area under [California Streets and Highways Code Section 158\(a\)](#)³, subdivision (a)(1) and (2) (2025). A “connectivity area” includes (1) areas identified by federal or state agencies that support special-status species under the federal or California Endangered Species Acts, and (2) areas identified by the California Department of Fish and Wildlife as important for ecological connectivity between natural landscape areas based on factors such as regional linkages, migration routes, species movement corridors, and areas of frequent wildlife crossing or mortality. Therefore, Caltrans should uphold their statutory expectations by evaluating wildlife connectivity impacts, coordinate with CDFW, avoid and minimize barriers, and analyze and mitigate in their CEQA document.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1: Wildlife connectivity assessment. Conduct a wildlife connectivity assessment for the entire Project area identifying barriers (small culverts, clogged culverts, sound walls, and other development) and opportunities (culverts, bridges, or restored corridors).

Recommendation #1: Design Measures. Caltrans should retain connectivity or incorporate design enhancements to preserve or improve wildlife passage within the culverts identified in wildlife connectivity assessments. Caltrans should consult with CDFW regarding connectivity questions and data, utilize the [CDFW Terrestrial Connectivity framework](#)⁴, and reference the Federal Highway Administration’s [Wildlife Crossing Structure Handbook: Design and Evaluation in North America](#)⁵.

³ https://law.justia.com/codes/california/code-shc/division-1/chapter-1/article-3-8/section-158/?_cf_chl_f_tk=PxG2XovszgWRN_DyZz3m50K9svMwpcbQPzCujuOf3DE-1782945454-1.0.1.1-e1Mlg8AUYMibdEN6pSyNOhILL_OT3lfktdDuXXE2E1M

⁴ <https://wildlife.ca.gov/Data/Analysis/Connectivity>

⁵ https://www.fhwa.dot.gov/clas/ctip/wildlife_crossing_structures/

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COMMENT #2: Impacts to Bats

Issue: The Project may impact bats.

Specific impact: The project may result in direct and indirect impacts to bats. Direct impacts include replacement of culverts that could provide roosting habitat and therefore has the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, additional artificial light, dust, vegetation clearing, ground disturbing activities (e.g., staging, access, excavation, grading), and vibrations caused by heavy equipment.

Why impact would occur: Bats use trees and man-made structures for daytime and nighttime roosts (Avila-Flores and Fenton 2005; Oprea et al. 2009). The MND stated that the Project area contains habitat for bats to forage and roost and the Project proposes to modify existing culverts and is adjacent to trees.

Modifications to roost sites can have significant impacts on the bats' usability of the roost and can impact the bats' fitness and survivability (Johnston et al. 2004). Even minor disturbance can lead to the abandonment of roosts (Johnston et al. 2004). The MND says that there will be culverts replaced and bats are often found in culverts. The MND currently doesn't propose surveys to determine if bats will be affected by Project activities, therefore Caltrans should conduct bat surveys to determine how best to protect bats prior to Project initiation.

Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & Game Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered SSC and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Therefore, Caltrans should follow their October 2021 update of [Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions](#)⁶, specifically Section 5 (Assessing Potential Bat Habitat) and conduct surveys for bat habitat.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations, and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #2: Focused surveys for bat habitat and roosting. CDFW recommends that focused surveys for bat habitat and roosting be conducted throughout the entire

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

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Project area to assess potential impacts. These surveys should be conducted in accordance with the October 2021 update of [Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions](#)⁷, specifically Section 5 (Assessing Potential Bat Habitat).

Mitigation Measure #3: Bat survey methodology and results. Bat survey methodology and results, including negative findings, should be included in final environmental documents. Depending on survey results, please discuss potentially significant effects of the proposed Project on the bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125).

ADDITIONAL COMMENTS

Recommendation #2: Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

Recommendation # 3: Lake and Streambed Alteration. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW recommends that Caltrans assess whether notification is appropriate. A Notification package for a LSAA may be obtained by accessing [CDFW's Lake and Streambed Alteration Program website](#)⁸.

Recommendation #4: Use of Native Plants and Trees. CDFW recommends Caltrans to provide a native plant palette for the Project. The Project's landscaping plan should be

⁷ <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>

⁸ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

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disclosed and evaluated in the MND for potential impacts on biological resources such as natural communities adjacent to the Project area (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project, especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', 'High', 'Limited', and 'Watch' by the [California Invasive Plant Council](#)⁹ CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project area. In addition, CDFW supports planting native species of trees, such as oaks (*Quercus* genus) and California Sycamore (*Platanus racemosa*), when appropriate, and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)¹⁰ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)¹¹.

FILING FEES

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

⁹ <https://www.cal-ipc.org/plants/inventory/>

¹⁰ <https://wildlife.ca.gov/Data/CNDDDB>

¹¹ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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CONCLUSION

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

Questions regarding this letter or further coordination should be directed to Andrew Domingos¹², Senior Environmental Scientist, at (858) 354- 9919.

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

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¹² Andrew.Domingos@wildlife.ca.gov

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

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

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Wildlife connectivity assessment Conduct a wildlife connectivity assessment	Prior to Project Initiation	Caltrans
Mitigation Measure #2: Focused surveys for bat habitat and roosting CDFW recommends that focused surveys for bat habitat and roosting be conducted throughout the entire Project area to assess potential impacts	Prior to Project Initiation	Caltrans

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #3: Bat survey methodology and results Bat survey methodology and results, including negative findings, should be included in final environmental documents.	Prior to environmental documents	Caltrans
Recommendation #1: Design Measures Caltrans should incorporate design measures, where feasible, to enhance wildlife passage and reduce wildlife–vehicle conflicts	Prior to Project Initiation	Caltrans
Recommendation #2: Mitigation and Monitoring Reporting Plan CDFW recommends the Project's environmental document include mitigation measures recommended in this letter.	Prior to final environmental document	Caltrans
Recommendation # 3: Lake and Streambed Alteration CDFW recommends that Caltrans assess whether notification is appropriate.	Prior to Project Initiation	Caltrans
Recommendation #4: Use of Native Plants and Trees CDFW recommends Caltrans to provide a native plant palette for the Project.	Prior to final environmental document	Caltrans