

California Department of Transportation

DISTRICT 12
1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6499
<https://dot.ca.gov/caltrans-near-me/district-12>



June 23, 2026

Andrew Domingos
Senior Environmental Scientist
California Department of Fish and Wildlife
3883 Ruffin Road
San Diego, CA 92123

Dear Mr. Domingos:

Thank you for your comments on the Initial Study with Proposed Mitigated Negative Declaration for the SR-241/SR-133 Multi-Asset project. Your comments during the public/state agency review period have been added into the Final Environmental Document. Please see responses attached below. Caltrans will take action on the project before June 30, 2026.

Sincerely,

Smita Deshpande

Smita Deshpande
Senior Environmental Scientist

Attachments:

1. CDFW Comments
2. Responses to CDFW Comments

c: Smita Deshpande, Senior Environmental Scientist, Caltrans
Alben Phung, Senior Environmental Scientist, Caltrans
Erin Knight, Environmental Scientist, Caltrans
Danielle Adili, Environmental Planner, Caltrans

From: [Domingos, Andrew@Wildlife](mailto:Domingos.Andrew@Wildlife)
To: [Saroa, Sunny@DOT](mailto:Saroa.Sunny@DOT)
Cc: [Phung, Alben@DOT](mailto:Phung.Alben@DOT); [Cleugh, Erika@Wildlife](mailto:Cleugh.Erika@Wildlife); [Rich, Mackenzie@Wildlife](mailto:Rich.Mackenzie@Wildlife)
Subject: MND Comment Letter SCH2026050820_SR-241_SR-133 Multi Asset Project_12-0T270
Date: Thursday, June 18, 2026 1:32:37 PM
Attachments: [image001.png](#)

Hi Sunny,

These are our preliminary comments that we find most critical for the project. We will follow up with a formal comment letter shortly that may shed additional information/clarification. Thank you.

Comment: Inadequate Analysis of Culvert Impacts and Wildlife Connectivity

S-1-1

The MND does not identify or describe the specific culverts proposed for repair or replacement. This lack of detail precludes meaningful evaluation of potential impacts to streams and waterways, wildlife movement, and habitat connectivity within the Project area.

Culverts within the 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.

Caltrans should identify all culverts proposed for repair or replacement, disclose their locations and existing conditions, and evaluate the current and potential function of each culvert for wildlife movement.

S-1-2

When developing the Project, Caltrans should incorporate design measures, where feasible, to enhance wildlife passage and reduce wildlife–vehicle conflicts. When doing so, Caltrans should consult with CDFW regarding connectivity questions and data, utilize the [CDFW Terrestrial Connectivity framework](#), and reference the Federal Highway Administration's [Wildlife Crossing Structure Handbook: Design and Evaluation in North America](#). In addition, Caltrans should 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).

S-1-3

The Project overlaps CDFW's Region 5 Barrier ID: W245 (Priority), SR-241 Loma Ridge on SR-241 from post miles 27.5-27.8. This Project is also approximately 4 miles south of the State Route 241 Wildlife Protection Fence Project (completed in 2016), which highlights the regional importance of maintaining and enhancing connectivity for mountain lions (*Puma concolor*) in this area. Therefore, the Caltrans analysis should include a focus on mountain lions as a state threatened species known to occur within the Project area.

S-1-4

Comment: Inadequate Analysis of Bat Habitat and Roosting Potential

The MND does not adequately evaluate the potential for bat habitat or roosting within the Project area. CDFW recommends that focused surveys for bat habitat and roosting be conducted throughout the entire Project area to assess potential

S-1-5

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](#), specifically Section 5 (Assessing Potential Bat Habitat).

Thank you,
Andrew

Andrew Domingos | Senior Environmental Scientist Specialist
He/Him [Why?](#)



South Coast Region (5)

Habitat Conservation Planning

Phone: 858-354-9919

3883 Ruffin Road

San Diego, CA 92123

3.5.1 Response to Comment S-1 from the California Department for Fish and Wildlife

Comment S-1-1

Caltrans acknowledges that culverts may facilitate wildlife connectivity. For this project, work is proposed only on culverts underground, beneath the paved roadway. At this time, Caltrans is not anticipating any need for permits, but during the next project delivery phase, Caltrans will evaluate and apply for permits if they are needed.

Comment S-1-2

Caltrans has analyzed project impact areas and has captured the effects in the Natural Environment Study – Minimal Impacts. Based on the project's scope of work, a wildlife connectivity assessment is not needed for this project.

Comment S-1-3

The purpose of this project is to rehabilitate pavement, restore drainage systems, and increase safety of the roadway, due to the surface distress, loss of serviceability, safety, and to meet current highway standards. While Caltrans acknowledges that the central and southern California distinct population segment of mountain lions are a State candidate species for the California Endangered Species Act and knows the regional importance for connectivity, it does not warrant a special focus for this project based on the project impacts and scope of work.

Comment S-1-4

The purpose of this project is to rehabilitate pavement, restore drainage systems, and increase safety of the roadway, due to the surface distress, loss of serviceability, safety, and to meet current highway standards. While Caltrans acknowledges that the central and southern California distinct population segment of mountain lions are a State candidate species for the California Endangered Species Act and knows the regional importance for connectivity, it does not warrant a special focus for this project based on the project impacts and scope of work.

Comment S-1-5

Areas of potential bat habitat are not proposed to be impacted by this project.