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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

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He/Him [Why?](#)



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