



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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South Coast Region
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August 14, 2026

Mathew Voss
California Department of Transportation (Caltrans) District 11
4050 Taylor St.
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Subject: Mitigated Negative Declaration for the I-15 Pavement and Asset Improvement Project, SCH No. 2026070490, San Diego County, CA

Dear Mathew Voss:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from the California Department of Transportation (Caltrans) for the I-15 Pavement and Asset Improvement Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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). provides of CEQA, CDFW is charged by law to provide, as

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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available, biological expertise during public agency environmental review 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 the California Department of Transportation (Caltrans) is not a signatory to the NCCP program, portions of the project occur within the boundaries of the Fully Signed Third Restated and Amended Planning Agreement (Planning Agreement; March 2021) for the draft North County Plan. Project activities occurring both within and outside of existing Caltrans right-of-way within the boundary of the draft North County Plan should be evaluated for consistency with applicable biological resource protection measures.

PROJECT DESCRIPTION SUMMARY

Proponent: California Department of Transportation (Caltrans) District 11

Objective: The proposed objective of the Project is to rehabilitate seven culverts, replace one culvert pipe segment, install rock slope protection (RSP), and improve pavement, signage, guardrails, and other traffic features.

Location: The Project is located on Interstate (I)-15 between postmiles (PM) M26.8 (Latitude 37.229444, Longitude -119.509444) to PM R52.1 (Latitude 37.229444, Longitude -119.50944) in and near the City of Escondido, San Diego County.

²fg attempt to hunt, pursue, catch, capture, or kill."

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Timeframe: Anticipated start of construction is April 2033, and anticipated end in September 2035, with approximately 500 working days to complete.

Biological Setting: The Project spans elevations of approximately 250 to 1,150 feet above mean sea level and extends from relatively level terrain in urbanized areas of Escondido to steeper embankments and hillsides in Bonsall and Fallbrook. Vegetation communities include coast live oak woodland, Diegan coastal sage scrub, mulefat scrub, southern coast live oak riparian forest, southern mixed chaparral, southern riparian woodland, orchards and vineyards, and urban/disturbed habitats. The Project is located within the [South Coast Missing Linkage](#)³ (Santa Ana to Palomar Mountains linkage), providing connectivity between the Cleveland National Forest and Marine Corps Base Camp Pendleton in the west to the Palomar Mountains and interior ranges in the east, and intersects high value (levels 4 and 5) [Areas of Conservation Emphasis](#)⁴ for terrestrial connectivity, including the San Luis Rey River and its riparian corridor. This South Coast Missing Linkage corridor spans I-15 and allows mountain lions and other species to maintain genetic diversity ([USGS, 2023](#))⁵. The Project is approximately 1.6 miles south of the 5,000-acre Santa Margarita Ecological Reserve, 0.45 mile west of the Mountain Meadows Preserve, and immediately adjacent to Escondido Creek and surrounding open space.

Site surveys included a habitat assessment, aquatic resource assessment, botanical survey, and roosting bat assessment on April 30, 2025; botanical and aquatic resource assessments on June 12, 2025; and botanical surveys on February 26, 2026, and March 13, 2026. Special status wildlife species that have the potential to occur within the Project area include, but are not limited to, mountain lion (*Puma concolor*; California Threatened), western spadefoot (*Spea hammondi*; California Species of Special Concern (SSC), Federally Proposed Threatened (FPT)), coastal California gnatcatcher (*Polioptila californica*, Federally Threatened (FT), SSC), Crotch's bumble bee (*Bombus crotchii*; California Candidate Species (SCE)), least Bell's vireo (*Vireo bellii pusillus*; Federally Endangered (FE), California Endangered (SE)), southwestern pond turtle (*Actinemys pallida*; SSC, FPT), arroyo toad (*Anaxyrus californicus*; FE), San Diego fairy shrimp (*Branchinecta sandiegonensis*; FE, SSC), Riverside fairy shrimp (*Streptocephalus woottoni*; FE, SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), coastal whiptail (*Aspidoscelis tigris stejnegeri*; SSC), red diamond rattlesnake (*Crotalus ruber*; SSC), San Diegan legless lizard (*Anniella stebbinsi*, SSC), coast patch-nosed snake (*Salvadora hexalepis virgulata*, SSC),

³ <https://surie.maps.arcgis.com/home/item.html?id=d99ff4e746df423c900b00b0756f683b#overview>

⁴ <https://data.ca.gov/showcase/areas-of-conservation-emphasis-ace>

⁵ <https://www.usgs.gov/publications/interstate-15-wildlife-crossing-design-considerations-focal-wildlife-species-santa-ana>

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coast horned lizard (*Phrynosoma blainvillii*, SSC) two-striped gartersnake (*Thamnophis hammondi*; SSC), pallid bat (*Antrozous pallidus*; SSC), Yuma myotis (*Myotis yumanensis*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*, SSC), western yellow bat (*Lasiurus xanthinus*, SSC), and yellow warbler (*Setophaga petechia*, SSC).

No protocol level surveys were conducted by Caltrans for any of the above listed species.

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 are also included to improve the document.

COMMENT # 1: Wildlife Connectivity

Issue: The Project may impact wildlife connectivity.

Specific impact: Culvert modifications, guardrails, artificial light, and other traffic features may significantly impact wildlife movement. Modification or replacement of culverts could adversely affect existing connectivity or fail to improve poor connectivity.

Why impact would occur: The MND does not include an analysis of all the potential effects related to wildlife connectivity that the Project may have. The MND states that wildlife may be directed into culverts or under the San Luis Rey River, but it does not analyze the entire Project. **CDFW is concerned that the Project would negatively impact wildlife connectivity or fail to address existing connectivity issues.** 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. It can also prevent populations from recolonizing habitat after disturbance events (e.g. fires, floods, droughts), lead to the loss of resident wildlife populations through altered community structure (e.g. species composition, distribution), and result in 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.

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2017; Chen et al. 2011). Therefore, preserving current culvert size, location, and invert may preserve existing barriers where an opportunity is present to design structures that allow for improved movement conditions.

Interstate 15 currently lacks crossing structures sufficient to accommodate wildlife movement between upland and aquatic habitats. Wildlife movement is essential for daily activities (e.g., foraging, sheltering, and breeding), dispersal, seasonal migration, gene flow, recolonization of vacant habitat, and range shifts in response to climate change; however, barriers such as roads and development disrupt these processes, impair ecological function, and can result in reduced biodiversity (Riley, 2018). A study by Winston Vickers (2017) found that most culverts along I-15 are misaligned or curved, limiting line-of-sight through the structure, a key factor influencing wildlife use thereby reducing their effectiveness as crossing features.

Vickers (2017) also documented wildlife-vehicle collisions occurring near existing crossing opportunities, indicating that animals are attempting to cross but are not consistently guided to safe locations. For example, a mountain lion mortality occurred near PM 42.2 adjacent to the Camino del Rey Bridge undercrossing, and a bobcat mortality occurred near PM 41.0 near the Gopher Canyon Road Bridge (CROS, 2026). Installation of directional fencing in combination with existing crossings would help funnel wildlife toward safe passage points, thereby reducing collision risk for wildlife and motorists. Similar measures have proven highly effective in reducing wildlife road mortality by more than 95 percent at a six-mile fencing project along State Route 241 in Orange County.

The MND also states that the Project would replace or improve lighting and notes that swallows were actively nesting within a broken light fixture at the Camino del Rey (PM 41.8) undercrossing, which could serve as a wildlife crossing. Given the replacement and/or improvement of lighting, CDFW is concerned that ALAN will impact wildlife connectivity throughout the Project. Artificial light at night (ALAN) is increasing in extent and intensity across the globe. It has been shown to interfere with animal sensory systems, orientation, and distribution, with the potential to cause significant ecological impacts (Barrientos et al. 2023). ALAN also causes changes in reproductive timing or success of birds in response to light leading to phenological mismatches and lower fitness (Barrientos et al. 2023). The impacts of light pollution also cause responses from biodiversity that include advance of spring leaf budding in deciduous trees, inhibition of mating insects under artificial light, wildlife shifts to darker/brighter areas where perceived predation risk is lower, and avoidance of lit wildlife crossings by mammals creating a barrier effect for linear infrastructure (Barrientos et al. 2023).

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Evidence impact would 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 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\(a\)](#)⁶, 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. Caltrans shall conduct a wildlife connectivity assessment for the entire Project area identifying barriers (small culverts, clogged culverts, guard rails, RSP, and other development) and opportunities (culverts, bridges, or restored corridors). The assessment shall occur

⁶ 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-e1Mlg8AUYMibdEN6pSyNOhLL_OT3lfktdDuXXE2E1M

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prior to completing 60 percent design and shall be submitted to CDFW for review so connectivity elements can be incorporated if needed.

Mitigation Measure #2: Artificial light minimization. Caltrans shall minimize impacts to wildlife from ALAN, by incorporating lumen reductions or artificial light elimination around bridge structures and riparian corridors where sensitive species and wildlife movement are most likely to occur. This minimization shall occur prior to completing 60 percent design.

Recommendation #1: Wildlife connectivity. After completing the wildlife connectivity assessment, Caltrans should evaluate the assessment in relation to the Project, reevaluate the MND to determine whether the assessment identifies new or substantially more severe environmental impacts, and recirculate the MND as appropriate pursuant to CEQA.

Recommendation #2: Incorporate connectivity elements into design plan sets. Caltrans should retain existing connectivity and incorporate design enhancements to preserve or improve wildlife passage throughout the Project identified from wildlife connectivity assessments. Enhancements should include increasing culvert diameters, improving alignment to provide clear sightlines, maintaining structures free of debris and obstructions, and minimizing human disturbance, particularly at night, to improve wildlife use. It is also recommended to install traffic calming measures such as wildlife crossing signs and reduced speed limits, and under bridges to slow cars. Caltrans should consult with CDFW regarding wildlife connectivity data and recommendations, utilize the [CDFW Terrestrial Connectivity framework](#)⁷, and reference the Federal Highway Administration's [Wildlife Crossing Structure Handbook: Design and Evaluation in North America](#)⁸.

Recommendation #3: Directional wildlife fencing. Caltrans should evaluate the installation of directional wildlife fencing and associated wildlife escape structures in the vicinity of the following eight bridges: Rainbow Glen Road (PM 52.1), Stewart Canyon Road (PM 48.9), San Luis Rey River (PM 46.0), Camino del Rey (PM 41.8), Gopher Canyon Road (PM 40.9), Lawrence Welk Road (PM 39.35), Mesa Rock Road (PM 34.9), and Nutmeg Road (PM 34.25). These locations may provide opportunities to improve wildlife connectivity, reduce wildlife-vehicle collisions, and guide wildlife movement through existing bridge crossings. Special consideration should be given to the Stewart Canyon Road Bridge due to the presence of conserved open space on both sides of the roadway, including the Fallbrook Land Conservancy property on the eastbound

⁷ <https://wildlife.ca.gov/Data/Analysis/Connectivity>

⁸ https://www.fhwa.dot.gov/clas/ctip/wildlife_crossing_structures/

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side and Monserate Mountain Preserve on the westbound side. Additionally, the San Luis Rey River Bridge warrants focused evaluation due to its riparian corridor, which may serve as an important wildlife movement pathway.

COMMENT # 2: Crotch's Bumble Bee

Issue: The Project may impact Crotch's bumble bee.

Specific impact: The Project may result in permanent loss of suitable nesting and foraging habitat of Crotch's bumble bee. Impacts from ground disturbing activities may include death or injury of adults, eggs, and larva, as well as cause burrow collapse, nest abandonment, and reduced nest success.

Why impact would occur: The MND states that preconstruction nest surveys will occur; however, CDFW is concerned that nests will not be identified. The nesting ecology of Crotch's bumble bee makes avoidance of incidental take particularly complex if the species is present, as nests are difficult to identify. Crotch's bumble bee primarily nest in abandoned small mammal burrows, but may also nest under perennial bunch grasses, thatched annual grasses, brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al., 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al., 2014). Ground disturbing activities conducted during the overwintering period may inadvertently result in direct mortality of individuals through crushing or destruction of burrows, which would be prohibited under CESA without an incidental take permit.

Evidence impact may be significant: The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining that the listing "may be warranted" and advancing the species to the candidacy stage of the CESA-listing process. Pursuant to Fish and Game Code section 2085, CESA candidate species are granted the same protection as CESA-listed threatened and endangered species. Therefore, take of Crotch's bumble bee is prohibited, except as authorized by State law through the issuance of an ITP or other authorization (Fish & G. Code, §§ 2080, 2085). Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Crotch's bumble bee is also listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#)⁹ (CDFW 2017). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered

⁹ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

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species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by Caltrans (CEQA Guidelines, § 1565).

Recommended Potentially Feasible Mitigation Measure(s)

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

Mitigation Measure #3: Crotch's bumble bee. A qualified biologist familiar with the species' behavior and life history shall conduct a species specific survey of suitable habitat within the Project area. Surveys shall occur during flight season for the species, within one year prior to vegetation removal and/or ground disturbance to determine the presence/absence of Crotch's bumble bee. Surveys should focus on both nesting and foraging habitat. Surveys shall follow methodology as described in [Survey Considerations document for CESA Candidate Bumble Bees](#)¹⁰ or similar methodology. The qualified biologist shall submit a report to CDFW, documenting the methods and results of the surveys prior to clearing/grubbing activities.

If bees are detected, the site shall be considered occupied, and an Incidental Take Permit shall be needed for take of Crotch's bumble bee.

COMMENT # 3: 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: The MND states that the Project area contains habitat for roosting bats and the Project proposes to modify existing culverts. CDFW is concerned that modifying the culverts will impact bats which roost in culverts. The Project area is adjacent to trees and bridges which also provide habitat for roosting bats, but it was not clear in the MND whether the adjacent habitat was assessed. Therefore, CDFW is concerned that there will be direct or indirect

¹⁰ <https://wildlife.ca.gov/Conservation/CESA>

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impacts to bats within adjacent trees and bridges may occur during Project activities without proper analysis. Bats use trees and man-made structures for daytime and nighttime roosts (Avila-Flores and Fenton 2005; Oprea et al. 2009).

The MND states that bats were observed roosting in Moosa Canyon Creek Culvert during one site visit. It is not evident within the MND that a full daytime bat habitat assessment was conducted throughout the Project area and the MND currently does not propose a bat habitat assessment throughout the Project area. Without a thorough bat habitat assessment, the Project may overlook roost sites, and fail to apply the appropriate minimization measures. Not having the appropriate minimization measures can have impacts on the bats' fitness and survivability (Johnston et al. 2004). Even minor disturbance can lead to the abandonment of roosts (Johnston et al. 2004).

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](#)¹¹, 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 #4: Focused surveys for a daytime bat habitat assessment. Caltrans shall conduct daytime focused surveys for bat habitat throughout the entire 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](#)¹², specifically Section 5 (Assessing Potential Bat Habitat). If bat habitat exists or bat habitat is present within 500 feet of the Project area, a qualified bat biologist shall develop a Bat Management Plan. The assessment shall occur prior to 60 percent design.

¹¹ <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>

¹² <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>

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Recommendation #4: Bat surveys methodology and results. Bat survey methodology and results, including negative findings, should be included in final environmental document. Depending on survey results, the final environmental document should 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

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). Additional comments or other suggestions may also be included to improve the document.

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](#)¹³.

Special status plants. CDFW recommends the Project area be surveyed for special status plants by a qualified botanist following the [Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities](#)¹⁴ as part of the biological technical studies conducted in support

¹³ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

¹⁴ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

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of the MND and potentially also the year prior to construction if Project activities may occur more than 3 years after the initial survey or if seasonal habitat conditions limited the likelihood of prior detection. This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period.

Use of Native Plants and Trees. CDFW recommends 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](#)¹⁵ 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](#)¹⁶ 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](#)¹⁷.

¹⁵ <https://www.cal-ipc.org/plants/inventory/>

¹⁶ <https://wildlife.ca.gov/Data/CNDDDB>

¹⁷ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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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.)

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 Domingos¹⁸, Senior Environmental Scientist.

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

cc: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Erika Cleugh, Senior Environmental Scientist (Supervisor)
Andrew Domingos, Senior Environmental Scientist (Specialist)

Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

¹⁸ Phone: (858) 354-9919; Email: 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: <u>Wildlife connectivity assessment</u> . Caltrans shall conduct a wildlife connectivity assessment for the entire Project area identifying barriers (small culverts, clogged culverts, guard rails, and other development) and opportunities (culverts, bridges, or restored corridors). The assessment shall occur prior to completing 60 percent design and shall be submitted to CDFW for review so connectivity elements can be incorporated if needed.	Prior to 60 percent design	Caltrans
Mitigation Measure #2: <u>Artificial light minimization</u> . Caltrans shall minimize impacts to wildlife from ALAN, by incorporating lumen reductions or artificial light elimination around bridge structures and riparian corridors where sensitive species and wildlife movement are most likely to occur. This minimization shall occur prior to completing 60 percent design.	Prior to 60 percent design	Caltrans
Mitigation Measure #3: <u>Crotch's bumble bee</u> . A qualified biologist familiar with the species' behavior and life history shall conduct a species-specific survey of suitable habitat within the Project area. Surveys shall occur during flight season for the species, within one year prior to vegetation removal and/or ground disturbance to determine the presence/absence of Crotch's bumble bee. Surveys should focus on both nesting and foraging habitat. Surveys shall follow methodology as described in Survey Considerations	Within 1 year before start of vegetation removal and/or ground disturbance	Caltrans

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Mitigation Measure	Timing	Responsible Party
document for CESA Candidate Bumble Bees²⁰ or similar methodology. The qualified biologist shall submit a report to CDFW, documenting the methods and results of the surveys prior to clearing/grubbing activities. If bees are detected, the site shall be considered occupied, and an Incidental Take Permit shall be needed for take of Crotch's bumble bee.		
Mitigation Measure #4: <u>Focused surveys for a daytime bat habitat assessment.</u> Caltrans shall conduct daytime focused surveys for bat habitat throughout the entire 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 Solutions²¹, specifically Section 5 (Assessing Potential Bat Habitat). If bat habitat exists or bat habitat is present within 500 feet of the Project area, a bat biologist shall develop a Bat Management Plan. The assessment shall occur prior to 60 percent design.	Prior to 60 percent design	Caltrans

²⁰ <https://wildlife.ca.gov/Conservation/CESA>

²¹ <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>