Interstate 15 Pavement and Asset Improvement Project

SAN DIEGO COUNTY, CALIFORNIA

11-SD-15-M26.8/R52.1

Project Number: 11-43162/1122000220

State Clearinghouse Number: Pending

Initial Study with Proposed Mitigated Negative Declaration

Prepared by the

State of California Department of Transportation

July 2026

General Information About This Document

What's in this document:

The California Department of Transportation (Caltrans) has prepared this Initial Study, which examines the potential environmental impacts of alternatives being considered for the proposed project in San Diego County in California. Caltrans is the lead agency under the National Environmental Policy Act (NEPA), for which a separate Categorical Exclusion has been prepared. Caltrans is also the lead agency under the California Environmental Quality Act (CEQA). The document explains why the project is being proposed, the alternatives being considered for the project, the existing environment that could be affected by the project, potential impacts of each of the alternatives, and proposed avoidance, minimization, and/or mitigation measures.

What you should do:

- Please read the document. Additional copies of the document and the related technical studies are available for review at the
  - Caltrans District 11 Office, 4050 Taylor Street, San Diego, CA 92110; Monday—Friday 9:00 AM to 5:00 PM
  - Escondido Public Library, 239 S. Kalmia Street, Escondido, CA 92025; Monday—Saturday 10:00 AM to 8:00 PM
  - Fallbrook Branch Library, 124 S. Mission Road, Fallbrook, CA 92028; Monday, Wednesday, Thursday 10:00 AM to 6:00 PM; Tuesday 12:00 PM to 7:00 PM; Friday, Saturday 10:00 AM to 5:00 PM
  - This document may be downloaded at the following website: engage.dot.ca.gov/11-43162_paed
- Tell us what you think. If you have any comments regarding the proposed project, please send your written comments to Caltrans by the deadline. Submit comments via U.S. mail to: Matthew Voss, Environmental Division MS 242, California Department of Transportation, District 11 Office at 4050 Taylor Street, San Diego, CA 92110. Submit comments via email to: matthew.voss@dot.ca.gov.
- Submit comments by the deadline: August 15, 2026.

What happens next:

After comments are received from the public and the 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 appropriated, Caltrans could design and construct all or part of the project.

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State Clearinghouse Number: pending
11-SD-15-M26.8/R52.1
Project Number 11-43162/1122000220

The proposed project would construct improvements to various transportation assets along Interstate 15 from post miles M26.8 to R52.1 in San Diego County by conducting pavement rehabilitation; culvert and drainage rehabilitation/replacement; and Complete Streets, Overhead Signs, Lighting Features, and mobility element upgrades.

INITIAL STUDY
with Proposed Mitigated Negative Declaration

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

THE STATE OF CALIFORNIA
Department of Transportation
Cooperating Agencies: United States Fish and Wildlife Service
Responsible Agency: California Transportation Commission

Tracey D'Aoust Roberts
Deputy District Director, Environmental
California Department of Transportation
CEQA Lead Agency

7/2/2026
Date

The following individual can be contacted for more information about this document:

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DRAFT
Proposed Mitigated Negative Declaration

Pursuant to: Division 13, Public Resources Code

State Clearinghouse Number: [pending]

District-County-Route-Post Mile: 11-SD-15 Postmile M26.8 to R52.1

EA/Project Number: 11-43162/1122000220

Project Description

The California Department of Transportation (Caltrans) proposes an asset rehabilitation project in San Diego County, on I-15 from postmile M26.8 to R52.1.

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 a 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.

An Initial Study has been prepared by Caltrans District 11. On the basis of this study, it is determined that the proposed action will not have a significant effect on the environment for the following reasons:

- Compensatory mitigation is anticipated for permanent impacts to federally designated coastal California gnatcatcher (Polioptila californica californica) critical habitat and Waters and Wetlands of the U.S. and State. This includes 0.08 acres of Diegan coastal sage scrub, 0.02 acres of mulefat scrub, and 0.02 acres of southern coast live oak riparian forest. Caltrans proposes to purchase credits from an approved mitigation bank at a 2:1 ratio for impacts on Diegan coastal sage scrub and an approved riparian mitigation bank at a 3:1 ratio for impacts on mulefat scrub and southern coast live oak riparian forest.

- A revegetation plan for temporary impacts would be submitted to U.S. Fish and Wildlife Service and California Fish and Wildlife Service for approval.

_____

Tracey D'Aoust Roberts
Deputy District Director, Environmental
California Department of Transportation

_____

Date

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Chapter 1 Proposed Project

1.1 Introduction

The proposed Interstate 15 Pavement and Asset Improvement Project (project or proposed project) intends to enhance and rehabilitate the pavement and multiple transportation assets on Interstate 15 (I-15) in and near the City of Escondido including unincorporated areas of northern San Diego County such as the communities of Rainbow, Fallbrook, Jesmond Dene, and Bonsall in San Diego County. The project spans 0.2 miles south of Via Rancho Parkway overcrossing to Rainbow Glen Road undercrossing. The project area extends along I-15 for approximately 25.2 miles. This portion of I-15 is an eight-lane freeway, and part of a major corridor. The primary land uses in the surrounding area includes residential, spaced rural residential, vacant and undeveloped land, industrial, and open space.

The proposed project is a State Highway Operation and Protection Program (SHOPP), Capital Preventative Maintenance (CAPM) project and would be funded through SHOPP-CAPM. The project would improve or rehabilitate assets including pavement, drainage, overhead sign structures, guardrail, Complete Streets, mobility, and traffic features.

The California Department of Transportation (Caltrans) would act as the lead agency for both the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA). This CEQA Initial Study with proposed Mitigated Negative Declaration and the NEPA Categorical Exclusion have been prepared in accordance with Caltrans' environmental procedures, as well as state and federal environmental regulations.

1.2 Purpose and Need

1.2.1 Purpose

The purpose of the project is to:

- Improve the ride quality of the pavement along Interstate 15.
- Rehabilitate or replace drainage.
- Bring Complete Streets, overhead signs, guardrail, mobility, and traffic features up to current Caltrans standard.

1.2.2 Need

Improving Pavement.

As the anchor asset, the existing pavement (45.67 lane miles of the 95.13 lane miles within the project limits) is in fair condition. The existing concrete pavement exhibits qualities of spalling, faulting, and third (3rd) stage cracking. Third (3rd) stage cracking is defined as any slab with two or more intersecting cracks of at least ¾ inch in width. The pavement rehabilitation is needed to extend the service life of the freeway. Pavement rehabilitation would be addressed by individual slab replacements, grinding, and shoulder and ramp overlays.

The bridge approach slab is exhibiting settlement leading to vehicle bouncing. Bridge pavement approach slab distress is associated with movement and water intrusion.

Rehabilitation or Replacement of Drainage and Culverts.

Drainage features within the project boundaries include culverts that are in fair condition due to sediment deposits, culvert misalignment, and material degradation. Culverts are to be improved by Cure-In-Place Pipe (CIPP) for those under the traveled way or by culvert replacement where CIPP is not sufficient, and the culvert is located outside of the travelled way. Improvements to drainage systems would protect the traveling public by maintaining the water flow in the area and preventing deterioration of the roadway.

Bringing Mobility and Traffic Features up to Current Caltrans Standard.

Overhead signs have also been identified for improvement within the project limits due to deteriorating retro-reflectivity related to weather due to sign age, and missing sign panels for overhead signs related to updated standards. Existing sign structures and panels would require upgrades to increase visibility, conforming with the latest design standards. Pedestrian and bicycle facilities would be enhanced at freeway interchanges to improve access through the corridor with the addition of green bicycle conflict striping, pavement delineated bike buffer creating a greater separation between bicyclists and motorists, signal improvements, improved crosswalk striping, addition of new pedestrian crossing, and new and updated pedestrian curb access ramps. Existing guardrail at overhead signs is Metal Beam Guardrail and would be upgraded to Midwest Guardrail System and extended to updated standards to protect reconstructed overhead sign structures. Traffic signals and relevant components including signal heads, loops, controllers, cabinets, cameras, and conductors would be upgraded throughout the project limits at spot locations where asset life cycle reset is necessary.

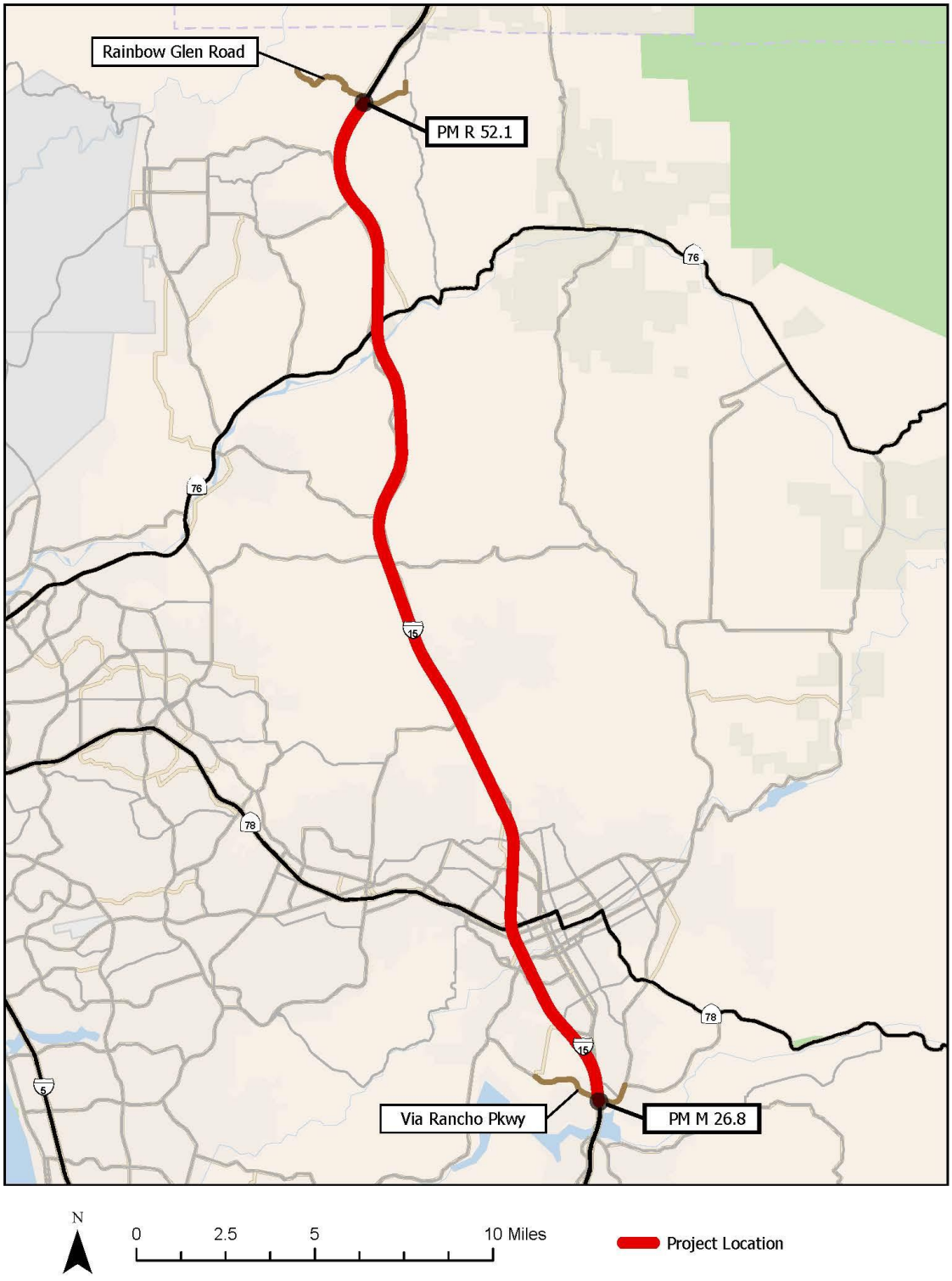
1.3 Project Description

The proposed project intends to improve, rehabilitate, restore, and upgrade multiple transportation assets on Interstate 15 between postmiles M26.8 to R52.1 in and near the City of Escondido in San Diego County. Scope of work includes rehabilitation of pavement and other assets related to drainage, mobility, traffic features, and Complete Streets.

Project vicinity and location maps are shown in Figures 1-1 and 1-2, respectively.

Figure 1-1 Project Vicinity Map

Figure 1-2 Project Location Map



1.4 Project Alternatives

This section describes the proposed project that was developed to achieve the project purpose and need while reducing environmental impacts. There are two alternatives: the Build Alternative and the No-Build Alternative.

1.4.1 Build Alternative

The Build Alternative, also referred to as the proposed project, contains standardized project measures that are used 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 listed later in this chapter under “Standard Measures and Best Management Practices Included in All Build Alternatives.”

The Build Alternative proposes to rehabilitate and enhance assets on I-15 from 0.2 miles south of Via Rancho Parkway Overcrossing to Rainbow Glen Road Undercrossing, PM M26.8 to R52.1. Improvements to assets proposed for this alternative are discussed in the following paragraphs.

Pavement Rehabilitation (Anchor Asset)

The Build Alternative would rehabilitate 95.1 lane miles of pavement for the I-15. The pavement rehabilitation would include removal of distressed pavement, concrete slab replacement, grinding, spall repair, and continuously reinforced concrete pavement (CRCP) lane replacement.

Concrete pavement minor rehabilitation would occur at select segments of all main lanes and shoulders in the northbound (NB) and southbound (SB) directions between postmile (PM) R40.0 and PM R52.1 on I-15 and includes:

- Slab replacement involves removing sections of the existing deteriorated concrete pavement and replacing it with new concrete. Slab replacement would occur at select segments, totaling to 1.59 lane miles.

- Pavement grinding would grind the top layer of existing pavement from PM R42.98 to R50.94 for 15.31 lane miles.

- Repair deteriorated concrete at the bridge at Rock Springs Road Undercrossing at PM R31.99. The scope of work would also include concrete fill and joint seal replacement from PM R40.00 to R52.11.

- Minor pavement rehabilitation consisting of removal and overlay of asphalt concrete median shoulder, outside shoulder, and ramps from PM R40.0 to PM R52.1and the Deer Springs Road northbound off ramp.

- CRCP lane replacement work would occur on 2.5 lane miles from PM R34.24 to R36.76. This scope of work would remove and replace the existing concrete with new concrete on the northbound #4 lane and rehabilitate 2 feet of the adjacent outside shoulder. The pavement rehabilitation would then replace the pavement to current Caltrans standard. The rest of the 8 feet shoulder would be grinded and overlayed.

- In some locations, the 2' addition into the shoulder may be on fill subgrade soil that would require .5' aggregate base being placed under the asphalt.

- The proposed pavement rehabilitation for the ramps and mainline shoulders includes rehabilitation of existing asphalt concrete with cold plane and overlay using rubberized hot mix asphalt.

Drainage System Restoration

The Build Alternative involves replacement and preventive maintenance of seven (7) and installation of one (1) culvert pipe segments within the project limits. System restoration would include cured-in-place pipe (CIPP). CIPP is a method of completely relining culverts using a thermosetting, flexible tube that is inflated and cured with hot water or steam. This restoration would also include replacement of drainpipes with inlets, headwalls, and rock slope protection (RSP), installation of new inlets and pipes, and dike replacement. Additional proposed drainage pipe and inlets would be added on southbound I-15 just north of Gopher Canyon Road.

Culvert pipe segment replacement and rehabilitation locations are shown below in Table 1-1.

Table 1-1 Culverts

Culvert Number	Post Mile Location and Direction	Length (linear feet)	Activity
1	R38.50, SB	65.2	Remove slotted drain pipe and install drainage inlet, CIPP
2	R38.50, NB	83.3	Remove slotted drain pipe and install drainage inlet, CIPP
3	R39.26, NB/SB	534.0	Install junction structure, replace existing Rock Slope Protection (RSP) and headwall, CIPP

Culvert Number	Post Mile Location and Direction	Length (linear feet)	Activity
4	R40.94, SB	548.0	Install Reinforced Concrete Pipe, install three drainage inlets, replace dike
5	R41.88, NB	103.5	CIPP
6	R41.88, NB	103.8	Replace Corrugated Steel Pipe down drain, install new headwall, and install RSP
7	R48.76, SB	91.7	CIPP
8	R48.76, NB/SB	27.0	Remove slotted drain pipe and install drainage inlet, CIPP

Mobility, Traffic, and Complete Streets Features

The proposed mobility improvements include upgrading the Vehicle Detection Systems (VDS) and reconstruction of pedestrian curb ramps to comply with the Americans with Disabilities Act (ADA) standards.

VDS upgrades include replacing in-pavement loops or radars that are in poor condition and adding new detection to fill gaps. A total of nine (9) curb ramp locations, including curb, gutter, and crosswalks would be upgraded to current standard and be ADA compliant. In addition, seven (7) intersections would have Accessible Pedestrian Signals installed or upgraded to meet current standards.

A total of twenty-four (24) overhead sign structures (OHSS) require improvements at select locations within the project limits from PM M26.8 to R52.1. Improvements would address structural and visibility deficiencies, ensure compliance with current Caltrans standards, and extend the service life of the OHSS.

Fifteen (15) OHSS require full replacement to address structural deficiencies and panels that do not meet current standards. The entire OHSS and the top 3’ of the existing foundation would be removed. The new OHSS and foundation would be installed in a location approximately 5-10’ away from the existing location. Existing electrical conduits would connect from the existing/old sign locations to the new sign locations.

Nine (9) OHSS require panel replacements and two (2) OHSS have missing plates/plaques which would be added.

Protective metal beam guardrail (MBGR) will be replaced with Midwest Guardrail System (MGS) in front of eight (8) of the OHSS. Vegetation control would also be added to meet current standards.

The existing concrete barrier in the I-15 median at the OHSS at PM M27.528 would need to be removed and replaced to accommodate the removal and replacement of the OHSS. 193 linear feet of existing concrete barrier would be upgraded to meet current standards.

The project proposes to upgrade the Class II Bike Lane delineation on 9th Avenue/Auto Park Way at the I-15 interchange. Work shown outside of the State right-of-way would be coordinated with the City of Escondido. Proposed improvements include green striping and bike symbols for bike lanes.

Design Consideration

The project included two options for accessing the outlet at Culvert 3 (Table 1-1). Option 1 would create an access path that would require clearing approximately 0.31 acre of scrub and chaparral, removing 7 mature coast live oaks, and removing one scrub oak. Option 2 would create an access path that would require clearing approximately 0.08 acre of scrub and chapparal, removing one scrub oak, and limbing one mature coast live oak. The Project Development Team selected Option 2 because it would result in less impacts.

The original design at Culvert 5 and 6 (Table 1-1) included an access path through riparian habitat. The access path was dropped from the design because it would have required clearing approximately 0.10 acre of riparian habitat comprised of mulefat scrub, coast live oak trees, and willow trees. The Project Development Team decided to use an existing overgrown two-track road that starts at Camino Del Rey and ends near the work area to avoid excessive impacts on riparian habitat.

1.4.2 No-Build (No-Action) Alternative

The No-Build Alternative provides a baseline for considerations of the Build Alternative. It may be preferred if other alternatives or variations proposed have substantial impacts to the environment, do not serve the project's purpose and need, or are not economically feasible.

The No-Build Alternative retains the existing conditions of the transportation assets and would not address the purpose and need of the project. This alternative would not rehabilitate the deteriorating assets, improve drivability of the roadway, or enhance mobility features and Complete Streets.

1.5 Standard Measures and Best Management Practices Included in All Build Alternatives

This project would incorporate Standard Measures and Best Management Practices (BMPs), which are regularly employed on most Caltrans projects and are not developed in response to any specific environmental impact resulting from the proposed project. Standard Measures and BMPs include, but are not limited to, the following:

- Water Conservation Practices: Activities that use water during the construction of the project in a manner that avoids erosion caused by runoff and/or the transport of pollutants off the site.

- Dewatering Operations: Intended to prevent the discharge of pollutants from construction site dewatering operations associated with stormwater (accumulated rain) and non-stormwater.

- Vehicle and Equipment Maintenance/Cleaning: Procedures and practices to minimize or eliminate the discharge of pollutants to the storm drain system or to watercourses from vehicle and equipment maintenance procedures. Also, minimize or eliminate the discharge of pollutants from vehicle and equipment cleaning operations to storm drains or watercourses.

- Paving, Sealing, Saw Cutting: Procedures that minimize pollution of stormwater runoff during paving operations include new paving and preparation of existing paved surfaces for overlays.

- Concrete Finishing: Minimize the impact that concrete finishing methods may have on stormwater runoff.

- Material Delivery and Storage: Includes but is not limited to secondary containment, spill prevention and control, product labeling, quantity reduction, proper storage, material covering, training, and inventory control.

- Material Use: Procedures and practices for use of construction material in a manner that minimizes or eliminates the discharge of these materials to the storm drain system or watercourses.

- Contaminated Soil Management: Procedures and practices to minimize or eliminate the discharge of pollutants to the storm drain system or watercourses from contaminated soil.

- Stockpile Management: PCC and asphalt concrete grindings stockpiles are required to be covered prior to rainfall and runoff from the stockpiles shall not be discharged to stormwater.

- Concrete Waste Management: Procedures and practices that are implanted to minimize or eliminate the discharge of concrete waste materials to the storm drain system or to watercourses.

- Solid Waste Management: Procedures and practices to minimize or eliminate the discharge of pollutants from the creation, stockpiling, or removal of construction site waste to storm drain systems or watercourses.

- Liquid Waste Management: Procedures to prevent pollutants related to non-hazardous liquid waste from entering storm drains or receiving waters.

1.6 Discussion of the NEPA Categorical Exclusion

This document contains information regarding compliance with the California Environmental Quality Act (CEQA) and other state laws and regulations. Separate environmental documentation, supporting a Categorical Exclusion determination, has been prepared in accordance with the National Environmental Policy Act. When needed for clarity, or as required by CEQA, this document may contain references to federal laws and/or regulations. For example, CEQA requires consideration of adverse effects on species identified as a candidate, sensitive, or special-status species by the U.S. National Marine Fisheries Service and the U.S. Fish and Wildlife Service—that is, species protected by the Federal Endangered Species Act).

1.7 Permits and Approvals Needed

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

Agency	Permit/Approval	Status
United States Army Corps of Engineers	Clean Water Act – Section 404 Nationwide Permit	Anticipated in Design Phase
United States Fish and Wildlife Service	Letter of Concurrence – Section 7 Informal Consultation	Anticipated in Design Phase
San Diego Regional Water Quality Control Board	Clean Water Act – Section 401 Water Quality Certification	Anticipated in Design Phase
California Department of Fish and Wildlife	Fish and Game Code – 1602 Lake and Streambed Alteration Agreement	Anticipated in Design Phase

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. Potential impact determinations include Significant and Unavoidable Impact, Less Than Significant Impact with Mitigation Incorporated, Less Than Significant Impact, and No Impact. In many cases, background studies performed in connection with a project will indicate that there are no impacts to a particular resource. A “No Impact” answer reflects this determination. The questions in this checklist are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

Project features, which can include both design elements of the project and standardized measures that are applied to all or most Caltrans projects such as Best Management Practices and measures included in the Standard Plans and Specifications or as Standard Special Provisions, are considered to be an integral part of the project and have been considered prior to any significance determinations documented below.

“No Impact” determinations in each section are based on the scope, description, and location of the proposed project as well as the appropriate technical report (available upon request), and no further discussion is included in this document.

The following resources have also been omitted from this document because they do not exist within the project scope of work limits:

- Agriculture and Forestry
- Mineral Resources
- Recreation

2.1.1 Aesthetics

Considering the information in the Visual Impact Assessment Memorandum dated November 20, 2025, the following determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Aesthetics
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?	**Less Than Significant Impact**
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	**No Impact**

Affected Environment

The project limits on I-15 between Via Rancho Parkway and Rainbow Valley Boulevard West feature a mix of rolling hills, open valleys, and suburban development, with scenic resources including natural landforms, preserved open space, and distant mountain views. The corridor's visual setting is a transitional zone between developed areas and more natural scenic vistas given the transportation infrastructure among rural and semi-urban landscapes.

The proposed work is not part of an officially designated or eligible State Scenic Highway. A portion of the proposed work is within Classified Landscaped Freeways.

Affected viewer groups include residents from the area and daily commuters, as well as motorists, cyclists, and pedestrians (on local roads) traveling at low to moderate speeds.

Environmental Consequences

Vegetation removal and median modifications at Auto Park Way may affect the visual quality/character to viewer groups.

Based on a review of the project scope and existing site conditions, there would be no substantial visual impact to the project site and surrounding areas. The proposed work would not affect the Classified Landscaped Freeway status.

The proposed complete street and mobility improvements include ADA curb ramp upgrades and enhanced visibility crosswalk striping. These improvements would cause each crossing to seem more urban. Viewer sensitivity to these changes caused by curb ramps and crosswalks would be considered low.

The project would cause minimal changes to the existing character of I-15. Viewer sensitivity to anticipated visual changes is considered low. Collectively, the 'low' change in visual resources combined with the 'low' viewer response indicates the project would cause a 'low' visual impact with the inclusion of impact avoidance measures.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following avoidance measures as project commitments:

Aesthetic Commitments:

- Minimize impacts to Auto Park Way median specialty paving by saw cutting existing median paving prior to constructing proposed ADA paving in the median. Replacement specialty paving beyond ADA pavement should closely match the existing color and texture of the existing Minor Concrete (Exposed Aggregate) median paving.

Landscape Commitments:

- Avoid impacts to Auto Park Way median irrigation which is maintained by the City of Escondido. Replace any existing operational irrigation equipment damaged by the contractor. Repair irrigation impacts in compliance with the city.

- Avoid impacts to existing operating irrigation systems along the freeway. Repair irrigation impacted by the project.

- Trucks and equipment shall be confined to paved areas and previously disturbed areas to the extent possible.

- Protect trees and vegetation outside of the work area by prohibiting staging areas, material storage, parking, and construction access under tree canopies and in vegetated areas.

- BMPs such as fiber rolls, felt fiber fabric, and gravel bags (if used) must be made of biodegradable materials (i.e. no plastic).
- Hydroseed disturbed areas along the freeway with a non-irrigated seed mix to blend with the surrounding native habitat. The seed mix shall only include Southern California native species and be approved by the district biologist.
- Apply non-irrigated seed mixes from November 1 to February 27.
- The project shall include Permanent Erosion Control Establishment (PECE) at 250 working days.
- Mulch disturbed areas at curb ramp work locations.

2.1.2 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.

Considering the information in the Air Quality Report dated June 30, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Air Quality
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?	**Less Than Significant Impact**
c) Expose sensitive receptors to substantial pollutant concentrations?	**Less Than Significant Impact**
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	**Less Than Significant Impact**

Affected Environment

The proposed project site is in San Diego County, in the San Diego Air Basin (SDAB). The boundaries of the SDAB are contiguous with the political boundaries of the County. Air quality regulation in SDAB is administered by

the San Diego Air Pollution Control District (SDAPCD). The County of San Diego describes sensitive receptors to include schools, residences, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Numerous sensitive receptors are near the project corridor, including residential neighborhoods, schools, daycare facilities, and other air quality-sensitive land uses.

The SDAB is designated as a nonattainment area for ozone, Respirable Particulate Matter (PM_{10}), and Fine Particulate Matter ($PM_{2.5}$), and as an attainment/unclassified area for all other standards under the state attainment status. Under the federal attainment status, the SDAB is designated as a nonattainment area for ozone, and unclassifiable or attainment for all other pollutants.

The project corridor is a mobile source air toxics source and is surrounded by several other sources that emit priority mobile source air toxics.

Caltrans is the lead agency under CEQA and NEPA. This air quality analysis addresses pollutants for which California has established air quality standards for CEQA. The air quality analysis to support NEPA findings addresses federal criteria pollutants, mobile source air toxics, and asbestos.

Environmental Consequences

Construction Emissions

Construction activities that cause temporary increases in emissions are not required in a hot-spot analysis under the transportation conformity regulations. These temporary increases in emissions are those that occur only during the construction phase and last 5 years or less at any individual site. For the proposed project, construction activities are not anticipated to last more than 5 years at any individual work site. Thus, a hotspot analysis is not required for the project's construction related emissions.

Construction-related emissions typically fall into two main categories: off-road and on-road equipment exhaust, and fugitive dust associated with demolition and ground disturbing activities.

Emissions associated with construction of the proposed project were calculated using the Caltrans Construction Emissions Tool based on model default information and available project-specific details.

Review of the model output indicated that peak particulate matter emissions were conservatively overestimated because the model applied the full project footprint to individual daily construction activities. In practice, particulate matter-generating activities, such as excavation, would occur over a substantially smaller area on any given day. An engineering judgement adjustment factor of 2 percent was applied, to better represent the anticipated

daily construction activity area (approximately 0.5 mile of excavation per day). With the adjustment, the maximum daily PM_{10} emissions were estimated at 61.24 pounds per day and $PM_{2.5}$ emissions at 6.12 pounds per day. Emissions are compared to the San Diego Air Pollution Control District Air Quality Impact Analysis Trigger Levels in Regulation II, Rule 20.2, applicable to new or modified stationary sources. The trigger levels may be used to evaluate the increased emissions from projects and to demonstrate that a project's emissions would not result in a significant impact to regional air quality or impede attainment of air quality for the region. These emissions would be below the thresholds recommended by the County of San Diego for CEQA analyses. The project's construction-related emissions are shown in the table below (Table 2-1).

Table 2-1. Project Construction-Related Criteria Air Pollutant Emissions

Pollutant	ROG	CO	NO_x	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (pounds per day)	0.50	3.79	3.05	61.24	6.12

*For Table 2-1, ROG is an abbreviation for Reactive Organic Gas

The project would generate temporary and unavoidable greenhouse gas (GHG) emissions from equipment use and material transport during construction activities. Therefore, the project would have a low potential to increase long-term GHG emissions. The table below (Table 2-2) summarizes the project's anticipated construction-related GHG emissions. See also section 2.1.7 Greenhouse Gas Emissions.

Table 2-2. Project Construction-Related GHG Emissions

Year	Emissions (metric tons carbon dioxide equivalents [MT CO_2e])
2033	31.64
2034	27.54
2035	4.72
Total	**63.89**

Mobile Source Air Toxics

The project would be expected to have low potential for mobile source air toxics effects because it would improve roadway operations without creating substantial new capacity or a major freight facility. Although sensitive receptors are within 500 feet of portions of the corridor, the project would not realign the freeway or substantially alter traffic conditions. Therefore, the project would not result in substantial increases in long-term mobile source air toxics exposure.

Asbestos

Based on geologic mapping, no areas of bedrock in the project footprint would be likely to contain naturally occurring asbestos; therefore, further analysis is not needed.

Potential asbestos in materials would be investigated before construction, and site-specific control measures would be incorporated into the final project design to address the potential adverse effects resulting from disturbance of asbestos. For more information on effort to address potential disturbance of asbestos see the Avoidance, Minimization, and/or Mitigation Measures in section 2.1.8 Hazards and Hazardous Materials.

Long Term Effects

Operational emissions associated with the Build Alternative would not be substantially different from the No-Build Alternative. Project elements would not add through lanes or increase roadway capacity. In addition, the project would extend the service life of the freeway which would reduce the need for future maintenance activities and associated emissions. Upgrades to pedestrian and bicycle facilities, such as improved access and visibility would further support active transportation. The project would provide long-term operational benefits through improved roadway conditions and smoother pavement surfaces, which would support more efficient traffic flow and reduce vehicle wear and fuel consumption.

The project is included in applicable regional transportation planning documents and would be consistent with the regional emissions assumptions that have been used in air quality planning.

Avoidance, Minimization, and/or Mitigation Measures

The following are BMPs that are also consistent with the requirements that are outlined in Caltrans' Standard Specifications:

Implement construction best management practices for fugitive dust:

- Prevent visible dust beyond the property line for more than 3 minutes in any 60-minute period, applying dust suppressants, and removing all track-out/carry-out dust at the conclusion of each workday.

- Use additional fugitive dust control measures, such as watering or application of dust suppressants, to reduce the generation of fugitive dust at active construction sites.

- Implement controls on haul trucks to reduce emissions from haul trucks transporting soil, sand, or other loose material off-site.

- Remove visible mud or dirt track-out onto adjacent public roads.

- Limit vehicle speeds on unpaved surfaces during construction to 15 mph.

- Suspend excavation, grading, and/or demolition activities when average wind speeds exceed 20 mph.

- Plant vegetative ground cover (e.g. fast-germinating native grass seed) in disturbed areas.

- Wash all trucks and equipment, including their tires, before leaving the construction site.

Reduce diesel emissions during construction from off-road equipment:

- Ensure that off-road equipment greater than 25 horsepower which will be operating for more than 20 hours during construction meet the following requirements: the engines are zero emissions or equipped with a CARB Level 3-Verified Diesel Emissions Control Strategy, if available for the equipment being used, unless the equipment meets EPA Tier 4 emission standards.

- Monitor idling time of diesel-powered construction equipment and trucks. Limit idling time to no more than 2 minutes.

- Maintain and properly tune construction equipment in accordance with the manufacturers' specifications.

- Prohibit portable diesel generators and use grid power when it is available. Use propane or natural gas generators when grid power electricity is not feasible.

- Use late model engines.

- Use low emission diesel products.

- Use alternative fuels in construction equipment.

- Use engine retrofit technology to control emissions from on and off-road equipment.

- Reduce diesel emissions during construction from on-road vehicles.

- Provide clear signage for construction workers at all access points.

- Arrange for construction-related deliveries to be scheduled during off-peak hours (e.g., 10 a.m. to 3 p.m.) and be coordinated to consolidate truck trips. When the movement of construction materials and/or

equipment impacts traffic flow, provide temporary traffic control (e.g., flag person) to improve traffic flow.

2.1.3 Biological Resources

Considering the information in the Natural Environment Study dated May 28, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Biological Resources
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 National Oceanic and Atmospheric Administration Fisheries?	**Less Than Significant Impact with Mitigation Incorporated**
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 Impact 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 Impact 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**

Affected Environment

The Biological Study Area (BSA) encompasses the area of direct potential impacts and areas that could be indirectly impacted by project activities. The BSA includes the entire construction footprint and 300 feet outwards from locations where ground disturbance would occur. The BSA is approximately 543 acres of several different land cover types of which only 73.5 are vegetated.

Land Cover

Vegetation communities described in the Natural Environment Study are derived from information provided by a vegetation layer developed by the San Diego Association of Governments (SANDAG), which is based on the Holland vegetation classification system. Land cover types and plant communities were mapped during habitat assessments.

Table 2-3 Land Cover and Plant Communities

Land Cover Type	Acres
Coast Live Oak Woodland	0.26
Diegan Coastal Sage Scrub	29.91
Disturbed Diegan Coastal Sage Scrub	6.17
Disturbed Habitat	18.71
Mulefat Scrub	1.23
Orchards and Vineyards	5.66
Southern Coast Live Oak Riparian Forest	0.22
Southern Mixed Chapparal	8.97
Southern Riparian Woodland	2.32
Urban/Developed	469.20
Total	**542.65**

The following ten (10) land cover types are present in the BSA:

Coast Live Oak Woodland

Approximately 0.26 acre of coast live oak woodland was present in the BSA west of the Camino Del Rey Undercrossing at approximately PM R41.82.

Diegan Coastal Sage Scrub

Approximately 29.91 acres of Diegan coastal sage scrub were present throughout the BSA, mostly along slopes and embankments near roadway shoulders.

Disturbed Diegan Coastal Sage Scrub

Approximately 6.17 acres of Diegan coastal sage scrub were present near roadway shoulders and areas impacted by wildfires.

Disturbed Habitat

Approximately 18.71 acres of disturbed habitat were present near roadway shoulders and in highway medians throughout the BSA.

Mulefat Scrub

The culvert system outlet at PM R41.88 discharges into a stream channel dominated by approximately 1.23 acres of the vegetation community best characterized as mulefat scrub.

Orchards and Vineyards

Approximately 5.66 acres of orchards comprised of mostly avocado trees were present at several locations near the Caltrans right-of-way in Bonsall, Pala Mesa, and Fallbrook.

Southern Coast Live Oak Riparian Forest

Approximately 0.22 acres of southern coast live oak riparian forest is present within the BSA. The outlet at the culvert system at PM R39.26 discharges into southern coast live oak riparian forest and a small amount is present south of Moosa Canyon Creek culvert.

Southern Mixed Chaparral

Approximately 8.97 acres of southern mixed chaparral were present at several different areas in Bonsall.

Southern Riparian Woodland

Approximately 2.32 acres of southern riparian woodland was present west of the Camino Del Rey Undercrossing at approximately PM R41.85.

Urban/Developed

The BSA is mostly comprised of urban/developed land cover and includes approximately 469.2 acres of paved and compacted surfaces and ornamental vegetation.

Critical Habitat

There is approximately 40.86 acres of coastal California gnatcatcher critical habitat within the BSA. Critical habitat within the interstate corridor provides a primary linkage between inland San Diego County populations and southwestern Riverside County populations. Most of the vegetated cover within the BSA includes all primary constituent elements that define coastal California gnatcatcher critical habitat.

Coastal California gnatcatchers were observed flying and vocalizing at the culvert system at PM R41.88. During the breeding season, one female was observed flying back and forth from coastal sage scrub and a shrub while gleaning, indicating potential breeding. During a winter site visit, an individual

was heard vocalizing and seen flying from mulefat scrub into Diegan coastal sage scrub.

Sensitive Natural Communities and Special-status Species

The potential for special-status species to occur in the BSA is based on known or expected geographic ranges, presence of suitable habitats or soils within the BSA, and degree of disturbance or development within the BSA and surrounding areas.

Botanical surveys were restricted to areas where ground disturbance and access would occur because construction activities will not affect habitats outside of work areas. Special-status plants were not detected during botanical surveys; therefore, they are not anticipated to occur in the project footprint or be impacted by construction activities.

Special-status animals present within or adjacent to the BSA were identified visually (with and without binoculars), auditorily, or via tracks. Most special-status animals in the official species list are not expected to occur in the BSA because habitat is absent, fragmented, or highly disturbed. Suitable habitat for 13 special-status animals is present within the BSA.

Table 2-4. Non-listed Special-Status Animals with Potential to Occur

Species
American Bumblebee
Crotch's Bumblebee
Coastal Whiptail
Coronado Skink
Orange-throated Whiptail
San Diegan Legless Lizard
California Glossy Snake
Coast Patch-nosed Snake
Red Diamond Rattlesnake
Two-striped Gartersnake
Coastal California Gnatcatcher
Dulzura Pocket Mouse
Northwestern San Diego Pocket Mouse

Bumblebees

Bumblebees were not detected during site visits. However, up to two Crotch's bumbles were photo-documented approximately 1.80 miles from the BSA. The construction footprint includes appropriate habitat and suitable food

plants. Small mammal burrows present during site visits may provide suitable locations for nests.

Reptiles

During a site visit, four coastal whiptails and two orange-throated whiptails were observed foraging in Diegan coastal sage scrub near the work area at culvert system PM R41.88, and one roadkilled red diamond rattlesnake was observed just outside of the BSA.

Diegan coastal sage scrub and northern mixed chaparral habitats in work areas at culvert systems PM R39.26 and R41.88 may support coast-patched nosed snakes. Mulefat scrub at the culvert system PM R41.88 work area may support two-striped gartersnakes.

Mulefat scrub, friable soil, and burrows at culvert system PM R41.88 may provide suitable sheltering, dispersing, and foraging area for Colorado skink, San Diegan legless lizard, and California glossy snake.

Pocket Mice

Work areas and access paths, at culvert systems PM R39.26 and R41.88, include Dulzura pocket mouse and northwestern San Diego pocket mouse habitat. Intact habitats between the culvert systems and locations historically occupied by both species provide a dispersal corridor. Therefore, there is potential and record for pocket mice to occur at these locations. Small rodent burrows were found in Diegan coastal sage scrub in work areas and access paths at these two locations. However, the species that constructed the burrows has not been positively identified.

Migratory Birds

The BSA includes a variety of habitats and resources available for nesting birds. Migratory birds capable of nesting within the BSA were observed during all site visits. Active cliff swallow nests were observed on the Lawrence Welk Drive Undercrossing Bridge and bridge piers at the San Luis River Bridge, one inactive black phoebe nest was found at Moosa Canyon Creek Culvert, and one common raven nest was observed on the West Lilac Road Overcrossing. White-throated swifts were observed congregating at the Camino Del Rey Undercrossing and a pair of northern rough-winged swallows were actively nesting within a broken light fixture at the Camino Del Rey soffit. California scrub jays were observed carrying nesting material into shrubs adjacent to the Lawrence Welk Drive Undercrossing. Two special-status birds were observed during site visits. Yellow warblers were observed in riparian habitat near culvert system PM R41.88, and one adult golden eagle was observed soaring and flying directly over the interstate.

Roosting Bats

Bats were observed roosting in Moosa Canyon Creek Culvert during one site visit. Biologists did not approach roosts for specific identifications to avoid flushing them. Guano was found throughout the culvert in areas where bats were not observed, indicating the culvert is also being used as a night-roost. Bridges throughout the BSA may provide recesses for roosting bats.

Aquatic Resources

Jurisdictional aquatic resources documented in the BSA include the San Luis Rey River which flows under the San Luis Rey River Bridge; unnamed channels at PM R39.26 culvert system; an unnamed wetland-stream complex at PM R41.88 culvert system; and a small segment of Moosa Canyon Creek just south of Camino Del Rey.

Habitat Connectivity

The I-15 travel way and developed areas may act as complete crossing barriers due to the amount of traffic, engineered impediments (e.g. railings, cable barriers, fencing, etc.), and highly fragmented habitats.

North of Escondido, riparian habitat and wooded drainages near I-15 may direct wildlife into culverts or under the San Luis Rey River to facilitate safe crossing. Various wetland and riparian areas near and along embankments and multiple culverts that measure up to 7 feet in diameter may provide safe crossing opportunities.

The culvert system at PM R39.26 does not provide crossing opportunities for large sized mammals due to its size. Medium sized mammals may not attempt to use it for crossing because the inlet and outlet are not within line-of-site of each other. This culvert may provide shelter or crossing opportunities for invertebrates, herpetofauna, or rodents.

The existing design at the culvert system at PM R41.88 does not allow medium to large sized mammals to cross under I-15.

Environmental Consequences

Land Cover

The project is primarily on paved roadways and only a small amount of natural habitat would be impacted by project activities. See the table below (Table 2-5) for approximate temporary and permanent impacts on vegetated land cover. Impacts on southern coast live oak riparian forest may include removing six red willow trees.

Table 2-5. Approximate Impacts on Land Cover in Acres

Land Cover Type	Temporary	Permanent
Coast Live Oak Woodland	--	--
Diegan Coastal Sage Scrub	0.66	0.04
Disturbed Diegan Coastal Sage Scrub	0.42	0.04
Mulefat Scrub	0.12	0.02
Orchards and Vineyards	--	--
Southern Coast Live Oak Riparian Forest	0.05	0.02
Southern Mixed Chapparal	0.04	--
Southern Riparian Woodland	--	--
Total	**1.29**	**0.12**

Critical Habitat

The main asset for this project is pavement; therefore, most work would occur in the existing roadway structure and developed areas adjacent to the roadway, where physical and biological features that define federally designated critical habitat are not present. Installing temporary K-rails and traffic control is also not expected to affect coastal California gnatcatcher because these activities would occur in developed landcover next to moving traffic. Replacing sign panels would also only occur in developed landcover and in areas with a high level of existing human disturbance. The proposed project was designed to avoid wetland and native vegetation impacts to the maximum extent possible. Therefore, roadway construction, delineating pavement, upgrading ADA assets, and replacing signs would not affect Coastal California Gnatcatcher or critical habitat.

Direct and Temporary Effects

Artificial illumination during nighttime work may negatively affect behaviors associated with nesting, foraging, and dispersal, potentially lowering the overall fitness and survival of individuals, including nestlings. In addition, lighting from construction may allow nocturnal predators to discover nests or individuals resting in shrubs more easily during nighttime work.

Movement from construction related foot traffic and the operation of equipment at culvert systems PM R39.26 and R41.88 could cause birds to flee nest sites or interrupt foraging. Disturbances of this nature could result in nest failure, or the reduced fitness and survivability of adults, chicks, or juveniles.

Temporarily clearing vegetation for access roads and work areas would affect physical and biological features that support nesting, foraging, and dispersing until the site is sufficiently revegetated with Diegan coastal sage scrub and southern mixed chaparral.

Direct and Permanent Effects

Installing headwalls at both systems, installing new RSP at Culvert system PM R41.88, installing vegetation control at guardrail locations, and increasing the footprint of four new post structures would permanently impact approximately 0.12-acre of critical habitat.

Indirect Effects

Potential indirect effects may include degraded habitat if construction activities spread or introduce invasive plants into the BSA. Invasive plants may outcompete native plant species that are crucial for nesting, foraging, and dispersal. Fugitive dust generated from construction activities may remain on vegetation after construction is completed and interfere with photosynthesis and gas exchange. Therefore, these stressors may negatively affect critical habitat and ultimately coastal California gnatcatcher as well.

Table 2-6. Approximate Impacts on California Coastal Gnatcatcher Habitat in Acres

Land Cover Type	Temporary	Permanent
Diegan Coastal Sage Scrub	0.49	0.04
Disturbed Diegan Coastal Sage Scrub	0.42	0.04
Mulefat Scrub	0.12	0.02
Southern Coast Live Oak Riparian Forest	0.05	0.02
Southern Mixed Chapparal	0.04	--
Total	**1.12**	**0.12**

Sensitive Natural Communities

Two sensitive natural communities are present within the BSA: Diegan coastal sage scrub and southern coast live oak riparian forest. Mulefat scrub, coast live oak woodland, southern mixed chaparral, and southern riparian woodland support assemblages of special-status animals.

Non-listed Special-Status Species

With the implementation of Conservation Methods (refer to Avoidance, Minimization, and/or Mitigation Measures section below) construction work is not anticipated to impact special-status animal individuals.

Bumblebees

Individual bumblebees are expected to avoid areas of active construction. If bumblebee nests were to occur in the construction footprint, they could be crushed or entombed from ground disturbance or foot traffic. Impacts to bumblebees are not anticipated.

Reptiles

Impacts may include mortality or injuries from equipment, vehicle, and foot traffic; entrapment in collapsed burrows during ground disturbance, trenching, or backfilling; entrapment in open trenches injury or mortality from clearing and grubbing; and entanglement in Erosion Control Devices. Illumination from construction may interfere with the natural circadian rhythms of California glossy snakes and it may allow nocturnal predators to easily find and prey on individuals. Impacts on reptiles are not anticipated.

Pocket Mice

With the implementation of Conservation Methods proposed for special-status reptiles, take of pocket mice is not anticipated. Potential impacts are the same as described above for special-status reptiles. Impacts on pocket mice are not anticipated.

Migratory Birds

Excessive noise, visual movement from construction activity, and artificial illumination near active nests may inadvertently flush nesting birds or disrupt breeding. White-throated swifts and black phoebes may abandon roosts if fumes from equipment or vehicles enter soffit venting holes or Moosa Canyon Creek Culvert. Effects on golden eagles would not occur because nesting substrate is not present in the BSA or within line-of-site of the proposed construction areas. In addition, known territories are located more than seven miles from the observation. Project activities would not affect golden eagles.

Impacts on nesting birds are not anticipated.

Roosting Bats

The access road at culvert system PM R41.88 is adjacent to the Moosa Canyon Creek Culvert apron, and the inlet is approximately 250 feet south of the work area. It is not clear if construction related noise would reach the culvert inlet. Excessive noise from construction work can cause stress, damage auditory system, interfere with echolocation while bats attempt to socialize or reproduce, and cause bats to flee. Approaching roosting bats, even inadvertently, can cause them to abandon roosts, sometimes permanently. Impacts to roosting bats are not anticipated.

Aquatic Resources

Impacts on jurisdictional aquatic resources from drainage work are only anticipated to occur at the culvert systems at PM R39.26 and R41.88. Construction activities at all other systems would not impact aquatic resources because the systems do not convey jurisdictional waters, and work would only occur on paved surfaces. Therefore, this section will not discuss drainage work at other locations along the project limits.

Impacts on aquatic resources at PM R39.26 would occur from lining the culvert, replacing RSP, and installing a headwall. Impacts on aquatic resources at PM R41.88 would occur from replacing a culvert, installing RSP, and installing a headwall (see Table 1-1).

Approximately 2.22 acres of potential jurisdictional Waters of the U.S. and State occur within the BSA. This would include an ephemeral riverine feature at PM R39.26; an intermittent riverine at PM R41.88; and lower perennial riverine system at San Luis Rey River. Waters of the U.S. include Waters of the State and are relevant to both U.S. Army Corps of Engineers and California Department of Fish and Wildlife permitting. Impacts would only occur at PM R39.26 and R41.88; therefore, the following discussion will not describe conditions at the San Luis Rey River.

At PM R39.26, the culvert system conveys flow across the interstate from west to east through a corrugated steel pipe. An existing concrete inlet collects flow from a rocky drainage lined with herbaceous species. Vegetation at the top of the banks consist of upland species. The flow discharges onto an existing RSP pad in southern coast live oak riparian forest and travels through a rocky channel lined with herbaceous species. The flow drains into a municipal culvert which discharges into Moosa Canyon Creek. Flowing water was present during one site visit, apparently in response to a preceding rain event. The channels are Waters of the U.S. and Waters of the State because they have definable bed and bank, and water conveyed by the channels eventually enters Moosa Canyon Creek. Temporary impacts on channels would occur from establishing work areas at the inlet and outlet and replacing RSP. Permanent impacts would occur from installing a headwall.

At PM R41.88, the culvert system collects stormwater runoff from a series of drop inlets placed on the roadway. The runoff enters a subsurface down drain at the embankment next to the northbound shoulder. The down drain discharges the runoff into an unvegetated channel, which connects to an unnamed channel. The unnamed channel flows into the north inlet of Moosa Canyon Creek Culvert and into Moosa Canyon Creek. Flowing or standing water was not present during site visits. The channel at the outlet and the unnamed channel are considered Waters of the U.S. and Waters of the State because they have definable bed and bank, and water conveyed by the channels eventually enters Moosa Canyon Creek. The channel is considered wetlands of the State because it receives and retains flow from aquatic resources. Temporary impacts on channels would occur from establishing a work area. Permanent impacts would occur from installing a headwall and RSP.

Channels at PM R39.26 and R41.88 are not considered wetlands of the U.S. However, channels at these locations are considered wetlands of the State. Although channels did not have hydric soils or hydrophytic plants, they collect

and convey surface water. This meets one of the three parameters used to define a wetland of the State.

Approximately 0.15-acre of temporary and 0.028 acre of permanent impacts may occur on jurisdictional waters consisting of both Waters of the U.S. and Waters of the State.

Habitat Connectivity

There is no anticipated change to habitat connectivity. The project would rehabilitate or replace existing culverts in place using various methods. Therefore, there would be no changes to habitat connectivity.

Conclusions and Determinations

Caltrans, as the delegated lead federal agency, determines:

- This project may affect, not likely to adversely affect Coastal California Gnatcatcher.
- This project may affect, not likely to adversely affect Coastal California Gnatcatcher critical habitat.
- No effects on the following federally listed species will occur: Del Mar manzanita, Encinitas Baccharis, Munz's onion, Nevin's barberry, San Diega ambrosia, San Diego thornmint, spreading navarretia, thread-leaved brodiaea, willowy monardella, Hermes copper butterfly, monarch butterfly, Riverside fairy shrimp, San Diego fairy shrimp, vernal pool fairy shrimp, arroyo toad, western spadefoot, southwestern pond turtle, least Bell's vireo, light-footed Ridgway's rail, southwestern willow flycatcher, yellow-billed cuckoo, or Stephen's kangaroo rat.
- No effects on arroyo toad, least Bell's vireo, or southwestern willow flycatcher critical habitat will occur.
- With implementation of the proposed Conservation Measures, take of Crotch's bumblebee is not anticipated.

Based on the findings above, Caltrans will initiate informal consultation under Section 7 of the Federal Endangered Species Act during the Design phase of the project. A Letter of Concurrence by the U.S. Fish and Wildlife Service will be issued prior to construction.

Avoidance, Minimization, and/or Mitigation Measures

The Conservation Measures (CM) that the proposed project would implement to avoid, minimize, or mitigate impacts on biological resources are discussed in the following subsections.

With the implementation of CMs listed below, effects on Coastal California Gnatcatcher and critical habitat will be less than significant.

Compensatory Mitigation is required for permanent impacts on coastal California gnatcatcher (CAGN) critical habitat. Therefore, Caltrans will mitigate for permanent impacts per CM – 9

- CM – 1 Environmental Awareness Training: Caltrans will provide environmental awareness training for all construction personnel before construction begins. At a minimum, the program will include the following: a discussion about sensitive natural communities and special-status species that may occur at the jobsite, a summary of the general ecology of CAGN and other special-status species that may occur, their sensitivity to human activities, the function of conservation measures used to protect sensitive natural resources, and penalties of non-compliance with permit conditions.

- CM – 2 Biomonitoring: Caltrans will designate a biologist(s) who has appropriate training and experience surveying for and monitoring CAGN and is knowledgeable about behaviors and the ecology of said species. The biologist(s) will be onsite during vegetation clearing, initial ground disturbance, and weekly during construction that will occur outside paved surfaces within 300 feet of CAGN habitat. The biologist will have authority to immediately halt any construction activities that may result in take of CAGN or other special-status species or result in unpermitted impacts on other natural resources.

- CM – 3 ESA Buffers: Personnel will install temporary ESA fencing along the perimeter of work and staging areas to protect sensitive habitat. Fencing material will consist of high visibility orange plastic snow fence, high visibility orange silt fence, or posts/stakes with ropes. If used, post or stake delineators will have orange flagging. Personnel will install ESA materials in a manner that does not result in unpermitted impacts on sensitive habitat and position materials, so boundaries are visible to all personnel, including equipment operators. Personnel will maintain ESA fencing and delineators throughout the duration of construction and completely remove them after construction is completed. Personnel will not stage, store materials, or place debris in ESAs. Work will immediately cease if personnel encroach into ESAs and Caltrans will coordinate with U.S. Fish and Wildlife Service (USFWS) if necessary. Work will not continue until authorized.

- CM – 4 Vegetation Removal: Vegetation removal and grubbing will only occur outside of the bird breeding season, which typically occurs between February 1 and September 30.

- CM – 5 Nesting Bird Surveys: The biologist will conduct preconstruction nesting bird surveys no more than 72 hours prior to the start of construction activities. The biologist will conduct subsequent surveys if work does not occur within 72 hours. If an active nest is discovered, the biologist will establish an appropriately sized ESA buffer based on species, nest location, sensitivity to disturbance, and/or the intensity or type of construction activities. Work within the ESA will be prohibited until the nest is inactive and fledglings are independent of adults.

- CM – 6 Nighttime Lighting: Personnel will direct lighting away from ESAs and habitat and only towards active work areas. Light structures will have directional shields attached on them.

- CM – 7 Dust Control: Personnel will control dust with water and not palliatives.

- CM – 8 Habitat Restoration: Caltrans will restore temporarily impacted habitats and mitigate for permanent impacts on habitats.

    a) After construction is completed, personnel will return disturbed bed and banks back to preconstruction conditions.

    b) Temporarily impacted mulefat scrub and aquatic features will be restored using mulefat stem cuttings and a native wetland seed mix. Caltrans will mitigate for permanent impacts on mulefat scrub by purchasing riparian credits from an approved riparian mitigation bank at a 2:1 ratio and mitigate for permanent impacts on southern coast live oak riparian forest by purchasing riparian credits from an approved mitigation bank at a 3:1ratio.

    c) Temporarily impacted critical habitat will be restored by applying a native Diegan coastal sage scrub seed mix to disturbed areas. Caltrans will mitigate for permanent impacts on critical habitat by purchasing credits from an approved mitigation bank at a 2:1 ratio.

- CM – 9 Revegetation Plans: Caltrans will submit a revegetation plan to USFWS and California Department of Fish and Wildlife (CDFW) for review. The plan will include the following:

    a) Planting palettes and pounds per acre necessary for restoration. The seed mix will be limited to locally native species (e.g., species found in San Diego County).

    b) Final implementation schedule will indicate when all impacts, as well as restoration will begin and end.

c) The final revegetation plan will include one year of plant establishment and maintenance of impacted areas. Success will include coverage of native species and, 0 percent coverage for all woody California Invasive Plant Council's (Cal-IPC's) "Invasive Plant Inventory" species (e.g., trees and shrubs), and no more than 10 percent coverage for other exotic/weed species.

d) A minimum of one year for maintenance and monitoring all temporary impact areas.

e) A qualitative and quantitative vegetation monitoring method with a map of proposed sampling locations. Photo points will be used for qualitative monitoring and relative cover estimates will be used for quantitative monitoring.

f) The revegetation maintenance and monitoring reports will be submitted to USFWS at the end of the revegetation period.

- CM – 10 Water Pollution Control: Erosion Control Devices used for the Project will be made from biodegradable materials with no plastic mesh to avoid creating a wildlife entanglement hazard. Personnel will implement and maintain stormwater and erosion control Best Management Practices described in the Caltrans Construction Site (BMP) Manual, follow specifications in Section 13 of the Caltrans Standard Specifications, and adhere to water quality standard special provisions.

- CM – 11 Disposal: To avoid attracting potential predators, the jobsite will be kept as clear of debris as possible. All food-related trash items will be enclosed in sealed containers and removed from the site at the end of each workday. All spoils and invasive plant cuttings will be disposed of properly.

- CM – 12 Invasive Plant Control: During construction, all invasive plant species on the National Invasive Species Management Plan, the State of California Noxious Weed List, and the California Invasive Plant Council's Invasive Plant Inventory list found growing within the work areas will be identified and removed. Special care will be taken during transport, use, and disposal of soils containing invasive weed seeds, and all weedy vegetation removed during construction will be properly disposed of to prevent them from spreading into areas outside of work areas. Heavy equipment will be washed and cleaned of debris prior to entering the jobsite to minimize the spread of invasive weeds. The contractor will obtain all permits, licenses, agreements, and certifications for proper disposal.

With the implementation of CMs listed below, effects on Sensitive Natural Communities will be less than significant.

Caltrans proposes to mitigate for permanent impacts on Diegan coastal sage scrub by purchasing credits from an approved mitigation bank at a 2:1 ratio. Caltrans proposes to mitigate for permanent impacts on mulefat scrub and southern coast live oak riparian forest by purchasing credits from an approved riparian mitigation bank at a 3:1 ratio.

See also CM – 1, CM – 3, CM – 7, CM – 8, CM – 9, CM – 10, and CM – 12.

With the implementation of CMs listed below, effects on Aquatic Resources will be less than significant.

Permanent impacts on Waters of the U.S., Waters of the State, and wetlands of the State require compensatory mitigation. Caltrans proposes to offset permanent impacts on Waters of the U.S., Waters of the State, and wetlands of the State by purchasing riparian credits from an approved riparian mitigation bank at a 3:1 ratio.

See also CM – 1, CM – 3, CM – 7, CM – 8, CM – 9, CM – 10, and CM – 12.

With implementation of the CM listed below, take of Crotch's bumblebee and impacts on American bumblebee will not occur.

- CM – 13 Bumblebee surveys: Before ground disturbance begins, a biologist approved by California Department of Fish and Wildlife will perform preconstruction bumblebee nest surveys. If a nest is discovered, the biologist will establish an ESA buffer around the nest.

- CM – 14 Species Discovery: If a bumble bee nest, special-status species, or nesting migratory bird is encountered during construction, work will stop within 100 feet of the discovery, and a protective buffer will be established. The Resident Engineer will contact the biologist for instructions. The biologist will coordinate with resource agencies if necessary. Work will not continue until authorized.

See also CM – 1, CM – 3, CM – 8, and CM – 12.

Compensatory mitigation for permanent impacts on bumble bee habitat is not proposed because mitigation for permanent impacts on Diegan coastal sage scrub and riparian habitats will suffice.

Impacts on special-status reptiles will be avoided or minimized with implementation of the CMs listed below.

- CM – 15 Entrapment: Stockpiles and spoil piles will be completely covered, and the edges of covers will be sealed tightly with sandbags

or other similar material at the end of each workday. All steep-walled holes, or trenches more than six inches deep will be securely covered at the end of each workday with plywood or similar materials, or escape ramps made of plywood or earthen material will be installed. Plywood will not exceed a 30-degree incline and have a non-slick surface to allow vertebrates to climb up the plywood and out of the trench. Before holes or trenches are filled, they will be thoroughly inspected for trapped animals. Prior to arrival onsite, all open-ended pipes or similar structures would be completely sealed or capped and remained sealed or capped until they are completely installed.

- CM – 16 Work Area Access: Equipment and personnel will only us single access points to the inlet and outlet at culvert system PM R39.26 as depicted in plans. Personnel will only access culvert system PM R41.88 from the temporary access road at Camino Del Rey and from the embankment next to the interstate northbound lane as depicted in plans.

- CM – 17 Wildlife Exclusion Fence (WEF): Before construction begins, personnel will install WEF along the perimeters of work sites at Systems 1 and 2. WEF will consist of high visibility orange woven nylon netting approximately two feet in height attached to wooden stakes. The bottom of the fence will be trenched beneath grade to prevent animals from burrowing beneath the fence. Fencing materials will be maintained during construction and completely removed after construction is completed. Personnel will repair damaged WEF materials and/or fix gaps. The biologist will be onsite during installation and removal of the WEF.

See also CM – 1, CM – 3, CM – 6, CM – 8, CM – 11, CM – 12, and CM – 14.

Compensatory mitigation for permanent impacts on reptile habitat is not proposed because mitigation for permanent impacts on Diegan coastal sage scrub and riparian habitats will suffice.

With implementation of CMs proposed for special-status reptiles, take of pocket mice is not anticipated.

See CMs proposed for special-status reptiles.

Compensatory mitigation for permanent impacts on pocket mouse habitat is not proposed because mitigation for permanent impacts on Diegan coastal sage scrub and riparian habitats will suffice.

With implementation of CMs listed below, take of birds covered under Migratory Bird Treaty Act will not occur.

- CM – 18: Idling Restriction: Personnel will not leave equipment or vehicles idling underneath bridges.

See also CM – 1, CM – 2, CM – 3, CM – 4, CM – 5, CM – 6, CM – 8, CM – 11, and CM – 14.

Compensatory mitigation for permanent impacts on bird nesting habitat is not proposed because mitigation for permanent impacts on Diegan coastal sage scrub and riparian habitats will suffice

With implementation of CMs listed below, take of bats is not anticipated.

- CM – 19 Bat Monitoring: A biologist will monitor roosting bats when construction begins at culvert system PM R41.88 to see if noise affects roosting behavior. Biologist will implement noise avoidance measures if necessary.

See also CM – 1, CM – 3, CM – 6, CM – 11, CM – 14, and CM – 18.

Compensatory mitigation is not proposed because take of roosting bats will not occur.

2.1.4 Cultural Resources

Considering the information in the Historic Property Survey Report (HPSR), Archaeological Survey Report (ASR) and Finding of No Adverse Effect (with Non-Standard Conditions) dated January 5, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Cultural Resources
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	**Less than Significant Impact**
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	**No Impact**
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	**No Impact**

Affected Environment

The proposed project's Area of Potential Effects (APE) was established by qualified Caltrans archaeologists to encompass the maximum extent of ground disturbances as well as direct, indirect, and cumulative impacts. The

APE corresponds to approximately 18 feet from the edge of the pavement, encompassing 22 miles of roadway and associated ramps within the existing Caltrans right-of-way. There are no defined subsurface vertical limits of the APE as all work does not extend past the existing at-grade built highway environment. This includes cut and fill modifications, pavement and structural fills associated with signage, electrical infrastructure, drainage and culverts.

Built Historic Resources

Several bridges and overcrossings within the project limits were analyzed and previously determined ineligible for the National Register of Historic Places.

Archaeological Resources

To determine the presence of archaeological resources that could be affected by the proposed project, a record search and archaeological survey were completed with a half mile radius of the project postmile length. As a result of the record search and survey, 24 archaeological resources along this project route were previously identified. However, only 4 of these resources were determined to exist within the proposed APE.

Environmental Consequences

The project's nature and scope have limited potential to affect historic properties within the APE because the footprint and ground disturbance depth of the work activities would not exceed the extent or depth where archaeological sites are located.

The Undertaking will result in No Adverse Effect to Historic Properties and properties eligible for the purposes of this Undertaking because all tangible constituents are sufficiently outside of the undertaking APE including all staging activities and areas of direct construction activity impacts. All eligible constituents are outside of the areas of direct construction activity impacts and there are no proposed work activities at depths of previously identified resources. Potential non-physical effects such as sound and vibration of construction equipment use are temporary. The possibility of dust and noise would cause temporary effects to these properties limited to the duration of construction, but these and other potential effects will not further diminish the integrity of each property's location, design, setting, materials, workmanship, feeling, or association. Permanent visual effects would be limited to replacement in-kind of existing traffic assets such as sign structures, guardrail and culverts. Therefore, these effects do not rise to a level of "adverse" as these activities require only temporary occupancy and in-kind replacement.

The State Historic Preservation Officer provided concurrence with this finding of No Adverse Effect on February 26, 2026.

Avoidance, Minimization, and/or Mitigation Measures

The following commitments will be applied to the project as avoidance and minimization measures to ensure proper treatment of unknown archaeological resources:

CR-1 Unanticipated Discovery: In the event of a discovery, the archaeological and/or Native American monitor will temporarily halt or divert ground-disturbing activities within 60 ft. of the discovery and will immediately notify the Project Engineer, Caltrans District Archaeologist, and Consulting Archaeologist, in accordance with the Caltrans Standard Specifications Section 14-2.03. Archaeological resources shall not be moved until directed to by Caltrans District 11 Archaeologist.

CR-2 Human Remains: If potential human remains are discovered, halt work within a minimum of 60 feet of the discovery and notify the Project Engineer, Consulting Archeologist, and Caltrans Archaeologist. If the bone is identified as human by the Caltrans Archaeologist or Consulting Archaeologist, or if it is questionable in origin, treatment procedures of the bone and area of discovery shall closely adhere to Health and Safety Code 7050.5 and Public Resources Code (PRC) 5097.98, including immediate notification of the County Coroner. All remains shall be left in place and protected until they can be examined by the County Coroner; no work shall occur in the area until the Coroner has made a determination as to the origin of the remains. If the remains are determined by the Coroner to be of Native American origin, the Coroner shall inform the Native American Heritage Commission. No photographs or destructive analyses will be performed without the written permission of the Most Likely Descendant.

CR-3 Environmental Monitoring Areas (EMA): Environmental monitoring areas within, near, or straddling the project limits are shown on project plans. The Department assigns environmental monitors to observe work activities within the EMA(s). No work shall occur within the EMA unless the monitor is present. If archaeological resources are discovered within the EMA, compliance is required with Standard Plans Section 14-2.03A.

2.1.5 Energy

Considering the information in the Air Quality Report dated June 30, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Energy
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**

Discussion of Energy Evaluation

The proposed project is not capacity-increasing project; therefore, a qualitative analysis was performed for this section. Construction of the proposed project would result in short-term direct energy consumption due to the manufacture of construction materials, the use of heavy-duty construction equipment requiring petroleum fuels, and construction workers' motor vehicles as they travel to and from the site. Construction-related energy consumption for the proposed project would be temporary. Energy consumption would not be excessive, because construction would adhere to Caltrans Standard Specifications, which include requirements to consider environmentally friendly treatments and use materials with recycled content to the extent feasible.

Once operational, the proposed project would result in negligible changes in energy consumption along the I-15 corridor. The proposed project would replace or improve existing elements along the roadway, including pavement, culverts, guardrail, shoulders, crosswalks, traffic management systems, and lighting. These features, such as operational and mobility improvements to the roadway, would not induce additional vehicle travel or otherwise consume excessive or unnecessary amounts of energy. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation, and there would be no impact.

2.1.6 Geology and Soils

Question—Would the project:	CEQA Significance Determinations for Geology and Soils
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 onsite or offsite 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 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**

Discussion of Geology and Soils Evaluation

The proposed project would be constructed to meet Caltrans' Seismic Design Criteria, which would minimize potential risk related to seismic ground shaking and other seismic hazards. Temporary effects due to soil erosion would be addressed by compliance with the National Pollutant Discharge

Elimination System (NPDES) Construction General Permit. The proposed project would make improvements to existing Caltrans facilities without changing their overall function and is not likely to exacerbate any existing hazardous soil conditions.

Furthermore, site specific soil conditions were evaluated in the project Geotechnical Report. Recommendations were made to address soil, liquefaction, and/or seismic issues.

Therefore, no impacts would occur due to seismic or soil hazards.

The project area is in low, marginal, and no potential paleontological sensitive zones according to Kennedy, M.P. and Tan, S.S. 2008 Geologic map of San Diego. As a result, project construction activities would have no impact on paleontological resources.

2.1.7 Greenhouse Gas Emissions

Considering the information in the Climate Change Report dated June 30, 2026, and the Air Quality Report dated June 30, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Greenhouse Gas Emissions
a) Generate greenhouse gas 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 greenhouse gases?	**No Impact**

Affected Environment

Greenhouse gas (GHG) emissions from transportation projects can be divided into those produced during operation and use of the State Highway System (operational emissions) and those produced during construction. The primary GHGs produced by the transportation sector are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride, and various hydrofluorocarbons. CO_2 emissions are a product of burning gasoline or diesel fuel in internal combustion engines, along with relatively small amounts of methane and nitrous oxide. In addition, the transportation sector emits a minor amount of hydrofluorocarbon emissions, which are related to refrigeration and air conditioning systems used in vehicles.

The project is within the jurisdiction of the San Diego Association of Governments (SANDAG). The applicable Regional Transportation Plan/Sustainable Communities Strategy for the region is the SANDAG 2025 Regional Plan. The goal of the SANDAG 2025 Regional Plan is to make transportation more convenient, equitable, healthy, and safe for everyone in the San Diego region. The project is included in the SANDAG 2025 Regional Plan under the North County Subregion Projects (Project ID CC050). The San Diego County General Plan Conservation and Open Space Element addresses GHGs in the project area, as well as the County's Climate Action Plan. Because the project is included in the SANDAG 2025 Regional Plan, its impacts on travel behavior and GHG emissions have been incorporated in the region's modeling and are part of the calculated reductions that are used to demonstrate compliance with the 19 percent per capita GHG emissions reduction target by 2035, applicable to the SANDAG region.

Environmental Consequences

The purpose of the proposed project is to rehabilitate the pavement, replace/rehabilitate drainage features, and bring Complete Streets, overhead signs, guardrail, and mobility features up to current Caltrans standards within the existing roadway footprint. This rehabilitation project would not increase the vehicle capacity of the roadway. This type of project generally causes minimal or no increase in operational GHG emissions. Because the project would not increase the number of travel lanes on I-15, no increase in vehicle miles traveled would occur. While some GHG emissions will be generated during construction, the project is expected to yield long-term GHG benefits which may include improved traffic flow and smoother pavement surfaces, thereby contributing to lower overall emissions. Improved fuel efficiency due to better maintained roads, and smoother pavement are some project benefits that contribute to lower GHG emissions. In conclusion, the project aims to improve asset conditions with no increase in operational GHG emissions expected, thereby providing a positive benefit on the environment.

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 table below summarizes estimated construction-related GHG emissions in metric tons carbon dioxide equivalent per year. GHG emissions associated

with construction activities were estimated using the Caltrans Construction Emissions Tool.

Table 2-7. Construction-Related CO_2e Emissions

Year	Emissions (metric tons carbon dioxide equivalents [MT CO_2e])
2023	31.64
2034	27.54
2035	4.72
Total	**63.89**

While the proposed project would result in GHG emissions during construction, it is anticipated that the project would not result in any increase in operational GHG emissions. The proposed project would provide transportation infrastructure improvements through pavement rehabilitation and upgrading or replacing transportation assets related to drainage, mobility and safety. The proposed improvements would not change the traffic carrying capacity of the area. Thus, the proposed project would not generate new vehicle trips nor would result in an increase in Vehicle Miles Traveled and would not generate operational GHG emissions that would have a significant impact on the environment.

Additionally, the proposed project does not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. With implementation of construction GHG emission reduction measures outlined in the Avoidance, Minimization, and/or Mitigation Measures section below, the impact would be less than significant.

Caltrans is firmly committed to implementing measures to help reduce GHG emissions. These measures are outlined in the following section.

Avoidance, Minimization, and/or Mitigation Measures

The following measures would also be implemented in the project to reduce GHG emissions impacts from the project.

- The construction contractor should utilize alternative fuels such as renewable diesel-fueled or solar-powered construction equipment, as feasible.

- The construction contractor shall implement an idling limit of 5 minutes or less for delivery trucks and other diesel-powered equipment (with some exceptions).

- The construction contractor shall reduce construction waste and maximize the use of recycled materials including project features as applicable (such as salvaging rebar from demolished concrete and process waste).

- The construction contractor shall schedule truck trips outside of peak morning and evening commute hours and implement a Traffic Management Plan (TMP), to be developed during the design phase, to minimize the effects to traffic.

- The construction contractor shall encourage improved fuel efficiency from construction equipment through ensuring that construction equipment is maintained and properly tuned and equipment has been correctly sized for the job.

- The construction contractor shall provide construction personnel with the knowledge to identify environmental issues and Best Management Practices to minimize impacts to the human and natural environment. The construction contractor shall supplement existing training with information regarding methods to reduce greenhouse gas emissions related to construction.

- The construction contractor shall use recycled water or reduce consumption of potable water for construction.

- The construction contractor shall reduce the need for transport of earthen materials by balancing cut and fill quantities.

- The construction contractor shall salvage large, removed trees for lumber or similar on-site beneficial uses other than standard wood-chipping.

- The construction contractor shall select long-life, permeable pavement materials that lower the rolling resistance of highway surfaces as much as possible while still maintaining design and safety standards.

- The construction contractor shall use cold in-place recycling for pavement rehabilitation, as feasible.

- The construction contractor shall replace lighting with ultra-reflective sign materials that are illuminated by headlights to reduce energy used by electric lighting.

2.1.8 Hazards and Hazardous Materials

Considering the information in the Environmental Engineering Memorandum dated April 21, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Hazards and Hazardous Materials
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?	**No 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?	**No 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 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?	**No Impact**
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	**No Impact**

Affected Environment

The five Cortese List databases were reviewed and there were no properties found listed that would conflict with proposed project activities. Cortese is a database that provides information about hazardous materials release locations.

Existing soil screening and statistical analysis for aerially deposited lead concentration data between I-15 PM R31.5 and PM R37.3 showed that the earth material along both northbound and southbound shoulders is classified as having unregulated ("clean") concentrations of aerially deposited lead (ADL).

There is existing ADL concentration data between PM R37.3 and R52.1 at limited locations:

- Northbound shoulder between R41.3 and R41.8 has data that demonstrates the earth material has unregulated concentrations of ADL
- Northbound shoulder between R44.5 and R44.7 has data that demonstrates the earth material has unregulated concentrations of ADL
- Southbound onramp from Old Highway 395 (PM R50.6) to shoulder (PM R49.8) demonstrates the earth material has unregulated concentrations of ADL

Based on this information, it is likely that the entire length of I-15 between PM R37.3 and PM R52.1 has unregulated concentrations of ADL; however, a X-Ray Fluorescence survey would be required to collect additional data to confirm.

The proposed project would include cold planing and grinding of paved surfaces, including roadway surfaces with thermoplastic, traffic stripes, and/or pavement markings. Paint and thermoplastics may include residue containing lead or other hazardous waste residue.

Removal of existing thermoplastic, traffic stripes, and/or pavement markings via grinding or cold planing would likely result in residue containing nonhazardous concentrations of lead.

The proposed project would likely generate treated wood waste (TWW) from the replacement of existing wooden posts in guardrail. TWW products contain hazardous chemical preservatives, and TWW is considered hazardous waste.

Environmental Consequences

Any hazardous materials determined to be present during construction would require special handling, reuse, and disposal because of their potential to harm human health and the environment. Because this project would involve

excavation and disturbance of earth material, a lead compliance plan would be prepared.

During pavement rehabilitation (cold planing and grinding), the proposed project would remove traffic striping and pavement markings that contain lead. The resulting residue would have nonhazardous concentrations of lead.

TWW would be generated from existing wooden posts within the proposed project.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measures to avoid or minimize effects from hazardous materials:

- Caltrans is designated as the generator of hazardous waste produced from work activities in accordance with Caltrans Standard Specifications.

- For hazardous waste generated on the job site, the Water Pollution Control manager must be knowledgeable of proper handling and emergency procedures for hazardous waste, as demonstrated by submitting a training certificate that indicates completion of training required under 22 California Code of Regulations Section 66265.16, in accordance with Caltrans Standard Specifications.

- A Lead Compliance Plan under Caltrans Standard Specifications would be required during construction when handling lead-contaminated soils, as well as removal of lead-based paint, thermoplastic, painted traffic stripe, and/or pavement marking.

- Caltrans would follow all requirements for ADL treatment and disposal pursuant to Caltrans Standard Special Provision.

- Removal of any treated wood waste (e.g., wooden posts for guardrails, signs, barriers, or piles) would require proper handling and disposal, in accordance with Caltrans Standard Special Provision. Treated wood waste products contain hazardous chemical preservatives; therefore, treated wood waste is considered a California Hazardous Waste.

- The construction contractor, upon discovery of unanticipated asbestos and/or hazardous substance, is required to immediately stop working in the area of the discovery and notify Caltrans Environmental Engineering, in accordance with Caltrans Standard Specification. Environmental Engineering will use the on-call Construction Emergency Response Contract to perform any required work for the proposed project.

- The construction contractor is required, in accordance with Caltrans Standard Specifications, to handle, store, and dispose of hazardous waste under 22 California Code of Regulations Division 4.5.

2.1.9 Hydrology and Water Quality

Question—Would the project:	CEQA Significance Determinations for Hydrology and Water Quality
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater 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 onsite or offsite;	**No Impact**
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite 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**
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**

Affected Environment

The project is in the Lake Hodges-San Dieguito River, Lower Escondido Creek, Upper Escondido Creek, San Marcos Creek, Moosa Canyon, Keys Creek, Hellers Bend-San Luis Rey River, Rice Canyon-San Luis Rey River,

and Rainbow Creek-San Margarita River watersheds. Within the project limits, I-15 crosses several streams throughout these watersheds, including Rainbow Creek, Moosa Canyon Stream, San Luis Rey River, Vista Canal, and Escondido Creek. Stream crossings are on bridges or in culverts under the roadway.

The proposed project would occur primarily in existing developed roadways and Caltrans facilities. Some areas of pavement rehabilitation are within an area of minimal flood hazard according to SANDAG Regional Data. However, no encroachment into a floodplain would occur.

No culverts in the project scope are located within the flood hazard zones.

At the start of the project, the topography, soil type, and flow patterns were assessed throughout the limits of the project to identify areas ideal for water treatment. It was identified this project would have 16.07 acres of total disturbed soil area. This value was calculated based on the added impervious areas, removed impervious areas, and replaced impervious areas.

Environmental Consequences

All culverts being replaced/rehabilitated are in-kind with no changes beside material type.

According to the calculation for total disturbed soil area, the proposed project would increase impervious surfaces along the project limits by about 4.08 acres.

Avoidance, Minimization, and/or Mitigation Measures

This project proposes to use Design Pollution Prevention Infiltration Area as a permanent treatment BMP to treat the 4.08 acres of new impervious surface as required by Caltrans MS4 Permit Order 2022-0033-DWQ. The Design Pollution Prevention Infiltration Area would use native soil and vegetation areas that have been designed or evaluated for infiltration capabilities. The BMP would be sized to capture the water quality volume, or a portion thereof, generated by the contributing drainage area. The area is calculated and used to address the post construction treatment requirement so that there is no new net impervious.

The proposed project would make improvements to existing facilities within the project limits along I-15 without modifying existing drainage patterns. Therefore, these BMPs and improvements would have no impact on flood hazards.

2.1.10 Land Use and Planning

Question—Would the project:	CEQA Significance Determinations for Land Use and Planning
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**

Discussion of Land Use and Planning Evaluation

The proposed project would not construct any barriers or inhibit access to and from the communities within the project limits. During construction, the proposed project would implement a Traffic Management Plan (TMP) to ensure that community access is retained throughout construction. The project would have no impact because the project replaces and improves existing facilities and maintains the existing land use and community boundaries.

2.1.11 Noise

Considering the information in the Noise and Vibrations section of the Hazardous Waste Memorandum dated February 2, 2026, the following significance determinations have been made:

Question—Would the project result in:	CEQA Significance Determinations for Noise
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?	**Less Than Significant Impact**
b) Generation of excessive groundborne vibration or groundborne noise levels?	**No Impact**

Question—Would the project result in:	CEQA Significance Determinations for Noise
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 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**

Affected Environment

The proposed project is classified as a Type III project, which is exempt from analysis under 23 CFR 772. No noise abatement analysis is included herein. The proposed project would take place on I-15 in the Caltrans right-of-way in a highly travelled roadway. Average annual daily traffic ranges from approximately 72,000 to 125,000 vehicle trips within the general project limits.

The proposed improvements would not modify the roadway in a way that would bring traveling vehicles (and associated roadway noise) closer to sensitive receptors. No widening or capacity increase would occur. Therefore, the proposed project would not increase noise levels above existing conditions.

Construction noise would be short term, intermittent, and often overshadowed by local traffic noise. All construction equipment would be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices. Any idling equipment would also be turned off when not in use. Thus, substantial temporary noise increases during construction would not occur, and there would be no impact.

Environmental Consequences

There would be no operational change in use of the roadway, and vibration levels would remain the same as existing conditions. The proposed project would result in intermittent, localized vibration in the project area during construction processes such grading, excavation, and earthwork, along with equipment movement. The vibration levels created by the normal movement of vehicles—including graders, front loaders, and backhoes used for construction—are the same order of magnitude as the ground-borne vibration created by heavy vehicles traveling on streets and highways. Therefore, operating equipment would not generate excessive ground-borne noise or vibration, and there would be no impact.

Avoidance, Minimization, and/or Noise Abatement Measures

Construction noise for the proposed project would be temporary and would be controlled by Caltrans Standard Specifications Section 14-8.02, which states the following:

- Do not exceed a maximum sound level of 86 A-weighted decibels at 50 feet from the job site activities from 9 p.m. to 6 a.m.
- Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler.

2.1.12 Population and Housing

Question—Would the project:	CEQA Significance Determinations for Population and Housing
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**

Discussion of Population and Housing Evaluation

The proposed project would improve various assets along I-15 without increasing the capacity of the highway or providing new access to the area. The proposed project would improve operations and mobility of the highway but would not induce substantial unplanned population growth. The project would not result in any residential or commercial property relocations; thus, no displacement of people would occur, and no replacement housing would need to be constructed. Therefore, there would be no impact.

2.1.13 Public Services

Question:	CEQA Significance Determinations for Public Services
a) 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 public services: Fire protection?	**No Impact**
Police protection?	**No Impact**
Schools?	**No Impact**
Parks?	**No Impact**
Other public facilities?	**No Impact**

Discussion of Public Services Evaluation

The proposed project would include the rehabilitation and enhancement of multiple assets on I-15. The construction of the proposed project would be in the existing developed Caltrans right-of-way, on existing assets, and would be temporary for the duration of construction activities. During construction, a TMP would be in place to identify any needed closures and establish alternate routes to public facilities, such as schools and parks. Public roads would remain open to emergency vehicles at all times. Emergency service providers and first responders would be notified of construction sequencing and the potential for temporary lane closures and/or changes to traffic circulation. Therefore, no new or physically altered governmental facilities would be needed to maintain acceptable service ratios, response times, or performance objectives.

2.1.14 Transportation

Question—Would the project:	CEQA Significance Determinations for Transportation
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 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?	**No Impact**

Discussion of Transportation Evaluation

Existing transportation facilities along I-15 include the roadway, pedestrian facilities, and bicycle facilities. Two High-Occupancy Vehicle (HOV) lanes exist within the project area in each direction south of West Valley Parkway.

The proposed project would be compatible with existing and planned pedestrian and bicycle facilities as part of the Complete Streets improvements and result in negligible change in use of the roadway. The proposed project would improve mobility for pedestrians in the area through ADA upgrades, curb ramps, and crosswalks at nine (9) locations on Auto Park Way and West 9th Avenue. The proposed project would also install or upgrade seven (7) intersections' Accessible Pedestrian Signals on Via Rancho Parkway, West 9th Avenue, Auto Park Way, West El Norte Parkway, and Pala Road (SR-76). Work outside Caltrans right-of-way includes striping to improve bicycle access on local streets (Auto Park Way/W 9th Avenue) near the I-15 interchange at Auto Park Way/W 9th Avenue.

Coordination will occur before construction with the City of Escondido, SANDAG, and Metropolitan Transit System regarding complete streets enhancements and potential transit impacts (associated with the Express lanes).

During construction, the project would implement a Traffic Management Plan to minimize any vehicle and transit delays along the roadway and identify alternate routes as needed for all transportation modes. Once operational, the

proposed project would improve operational efficiency and mobility along the roadway. No transit or roadway facilities would be removed or inhibited by the proposed project. Therefore, there would be no impact.

2.1.15 Tribal Cultural Resources

Considering the information in the Historic Property Survey Report (HPSR), Archaeological Survey Report (ASR) and Finding of No Adverse Effect (with no Standard Conditions) dated January 5, 2026, the following significance determinations have been made:

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 Significance Determinations for Tribal Cultural Resources
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	**Less Than Significant 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	**Less Than Significant Impact**

Affected Environment

During Native American consultation, an eligible historic property was identified: Pamoosa Complex Traditional Cultural Property (TCP). The Pamoosa TCP is a cultural landscape comprising 34 contributing archaeological sites and surrounding ecological features that embody the cultural and ceremonial practices, and settlement patterns of the Luiseño people. On October 29, 2025, Caltrans Cultural studies Office approved of project specific National Register of Historic Places eligibility of the Pamoosa Complex TCP.

On March 25, 2025, outreach letters containing the project location, Sacred Land file inquiry results and the desire for further consultation were provided to twelve (12) traditionally and culturally affiliated tribal communities via email. Rincon Band of Luiseño Indians were present for project related survey efforts. Initial outreach, follow-up and finding of effect notices were sent to all parties listed by the Native American Heritage Commission and any responses were followed up timely and adequately.

Environmental Consequences

All features of the Traditional Cultural Place or Property are outside of the proposed construction footprint or Area of Direct Impact resulting in no physical damage which results in no impact. Temporary effects such as introduction of visual, audible, and atmospheric elements would be temporary in nature limited to the duration of the project during construction. Work entailing replacement in kind of highway assets and infrastructure would result in negligible accumulative effects to the historic properties and would not further diminish the traditional character, identity, or use.

Tangible contributing features, such as archaeological sites, of the Pamoosa Complex TCP are outside the project's construction footprint. Intangible contributing features of the Pamoosa Complex TCP such as setting, location, associate or feeling will not be affected by replacement in-kind of existing traffic assets.

For the undertaking, a finding of No Adverse Effect is appropriate pursuant to 36 CFR 800.5(b) and Section 106 PA Stipulation X.B.2.

Avoidance, Minimization, and/or Mitigation Measures

It is Caltrans policy to avoid cultural resources during project design. Tribal Cultural Resources were analyzed for potential effects due to project related activities. Effects were found to be temporary in nature such as construction occupancy, noise, and changes to association and setting. Tangible contributing elements of the Pamoosa TCP such as the subsurface archaeological deposits are outside of the project footprint.

Native American Consultation efforts concluded archaeological monitoring should only occur in the presence of archaeologically sensitive soils or the potential to expose such soils.

In the instance project design incorporates sensitive soils, the TCP will be designated as an Environmental Monitoring Area on undertaking layout design plans.

2.1.16 Utilities and Service Systems

Question—Would the project:	CEQA Significance Determinations for Utilities and Service Systems
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water 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**
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**

Discussion of Utilities and Service Systems Evaluation

The proposed project would avoid existing utilities and minimize conflicts and relocations as a key component of the design process. Temporary interruptions to services are not anticipated.

The proposed project would not result in any population growth or subsequent increase in water demand, wastewater generation, or solid waste disposal needs. The proposed project may use a limited amount of water if necessary for dust control during construction. These demands would be negligible and would not exceed available supplies. Similarly, wastewater disposal would only be temporarily required during construction. Solid waste disposal, including construction demolition debris recycling, would occur in accordance with Caltrans Standard Specifications 14-10 and would not exceed state or local standards or conflict with applicable statues. The project would not

require the construction of any new or expanded water, wastewater treatment, or solid waste disposal facilities. The project proposes replacement or rehabilitation of stormwater drainage facilities (culverts), the environmental effects of which are assessed throughout this document by resource area. Therefore, there would be no impact on utilities and service systems.

2.1.17 Wildfire

Considering the information in the Climate Change Report dated June 30, 2026, the following significance determinations have been made:

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

Question—Would the project:	CEQA Significance Determinations for Wildfire
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**

Discussion of Wildfire Evaluation

Climate change is anticipated to increase wildfire threat/danger. Based on CalFire's Fire Hazard Severity Zone mapping tool, developed through the Fire and Resource Assessment Program, the project site is in an area vulnerable to wildfire—classified as Moderate, High, and Very High fire hazard areas. In addition, the 2019 Caltrans District 11 Climate Change Vulnerability Assessment analyzed the level of wildlife concerns for the project site. The

project site is in an area with a future level of wildfire exposure rated as moderate.

Project construction would occur within existing developed Caltrans right-of-way that is operated and maintained by Caltrans. The project would adhere to Caltrans' Standard Specification, which mandates fire prevention procedures during construction, including a fire prevention plan. Wildfire risk would not be exacerbated by the project because of slope, prevailing winds, or other factors. Furthermore, the project would not require installation of any infrastructure that could exacerbate wildfire risk or result in temporary or ongoing risks to the environment. The project would not introduce new uses or develop facilities that could exacerbate wildfire risks. In addition, Caltrans is working to improve roadside fire resiliency, in coordination with CAL FIRE and local fire agencies, by implementing strategies such as vegetation removal, increasing defensible space adjacent to highways, and selecting more fire-resistant materials in areas prone to fires (Caltrans 2022). Thus, the project would not exacerbate existing wildfire risks or contribute to new risks that could occur under climate change.

2.1.18 Mandatory Findings of Significance

Question:	CEQA Significance Determinations for Mandatory Findings of Significance
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 With Mitigation Incorporated**
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 Impact**

Question:	CEQA Significance Determinations for Mandatory Findings of Significance
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	**No Impact**

Affected Environment

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of the proposed project. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a period of time.

Cumulative impacts to resources in the project area may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive agricultural cultivation. They can also contribute to potential community impacts identified for the project, such as changes in community character, traffic patterns, housing availability, and employment.

Caltrans would have cumulative projects occurring or planned to occur along Interstate 15, that could overlap with the project footprint or otherwise affect similar resource areas. However, these projects are considered minor maintenance projects of existing Caltrans assets and upgrades to Caltrans facilities.

Routine maintenance projects (e.q., tree trimming or facility repairs) occur on an as-needed basis and may occur in the project area depending on maintenance requirements.

Construction of the proposed project would result in temporary and short-term impacts that would be limited to the project site and immediate vicinity.

Cumulative effects on federally designated Coastal California Gnatcatcher critical habitat and Waters and Wetlands of the U.S. and State are not anticipated to occur as a result of the project. Impacts would occur on a small percentage of available critical habitat and riparian habitat. Temporarily impacted habitats would be reseeded and planted with native species. Caltrans proposes to purchase credits from approved mitigation banks for permanent impacts on these habitats.

Although impacts related to resources such as air quality, GHG emissions, and traffic would contribute to regional impacts, these impacts would not make a cumulatively considerable contribution to any significant cumulative impact resulting from other past, present, and reasonably foreseeable future projects in the vicinity of the site. This is due to the scale of the proposed

project activities, limited nature of construction-related impacts over a relatively short construction period, minimal operational change, and the proposed avoidance and minimization measures that would limit the potential for any significant impacts.

GHG cumulative impact determination is made by analyzing the incremental impacts of the project and must be compared with the effects of past, current, and probable future projects. Although climate change ultimately has a cumulative impact, not every individual project that emits greenhouse gases must be found to contribute to a significant cumulative impact on the environment. This project would have less than significant impacts on the environment from an air quality standpoint. The identified asset and maintenance projects would have GHG emissions during construction activities and have a less than significant impact.

Avoidance, Minimization, and/or Mitigation Measures

No additional measures are required beyond those already discussed by resource area in this Initial Study.

Also, refer to section 1.5, Standard Measures and Best Management Practices.

Chapter 3 Coordination

Native American consultation has been completed for the proposed project pursuant to Assembly Bill 52 (AB 52). On March 25, 2025, outreach letters containing the project location, Sacred Land file inquiry results and the desire for further consultation were provided to twelve (12) traditionally and culturally affiliated tribal communities via email. Rincon Band of Luiseño Indians were present for project related survey efforts. Initial outreach, follow-up, and finding of effect notices were sent to all parties listed by the Native American Heritage Commission and any responses were followed up timely and adequately. Refer to Section 2.1.15 Tribal Cultural Resources for additional details.

Coordination with the Caltrans Cultural Studies Office (CSO) and the State Historic Preservation Officer (SHPO) determined concurrence with the Finding of Effect for historic resources. Caltrans, pursuant to Section 106 Programmatic Agreement (PA), Stipulation X.B.2, determined that a Finding of No Adverse Effect is appropriate for the proposed project. Concurrence with this finding was received on February 26, 2026.

Technical assistance with the Caltrans U.S. Fish and Wildlife Service (USFWS) liaison Sandra Hamilton is summarized below:

- December 4, 2025: requested technical assistance via email.
- December 8, 2025: met to discuss species occurrences at culverts and provided photographs. Sandra Hamiton and biologist agreed that Section 7 consultation was prudent. Informal vs. formal would be dependent on scope of impacts and Conservation Measures. Biologist requested to submit a Natural Environmental Study (NES) in lieu of a Biological Assessment. Sandra Hamilton reported an NES would be acceptable if it covered items required in a Biological Assessment.
- December 15, 2025, February 2, 2025, April 15, 2026: via email, video conference, and telephone, further discussions occurred between Caltrans biologist and Sandra Hamilton on species occurrences and the project impact.

Appendix A Title VI Policy Statement

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

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September 2025

TITLE VI/NON-DISCRIMINATION POLICY STATEMENT

It is the policy of the California Department of Transportation (Caltrans), in accordance with Title VI of the Civil Rights Act of 1964 and the assurances set forth in the Caltrans' Title VI Program Plan, to ensure that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Related non-discrimination authorities, remedies, and state law further those protections, including sex, disability, religion, sexual orientation, age, low income, and Limited English Proficiency (LEP).

Caltrans is committed to complying with 23 C.F.R. Part 200, 49 C.F.R. Part 21, 49 C.F.R. Part 303, and the Federal Transit Administration Circular 4702.1B. Caltrans will make every effort to ensure nondiscrimination in all of its services, programs, and activities, whether they are federally funded or not, and that services and benefits are fairly distributed to all people, regardless of race, color, or national origin (including LEP). In addition, Caltrans will facilitate meaningful participation in the transportation planning process in a non-discriminatory manner.

The overall responsibility for this policy is assigned to the Caltrans Director. The Caltrans Title VI Coordinator is assigned to the Caltrans Office of Civil Rights Deputy Director, who then delegates sufficient responsibility and authority to the Office of Civil Rights' managers, including the Title VI Branch Manager, to effectively implement the Caltrans Title VI Program. Individuals with questions or requiring additional information relating to the policy or the implementation of the Caltrans Title VI Program should contact the Title VI Branch Manager at title.vi@dot.ca.gov or at (916) 639-6392, or visit the following web page: https://dot.ca.gov/programs/civil-rights/title-vi.

Dina El-Tawansy (Sep 12, 2025 16:52:12 PDT)
DINA A. EL-TAWANSY
Director

"Improving lives and communities through transportation."

List of Technical Studies

Air Quality Report

Climate Change Report

Natural Environment Study/Biological Assessment

Historical Property Survey Report

- Archaeological Survey Report

Environmental Engineering Technical Memorandum

Visual Impact Assessment Memorandum

Stewardship Memorandum

Energy Memorandum

Copies of one or more of these technical studies/reports are available on request. To obtain a copy of one or more of these technical studies/reports or the Initial Study, please send your request to:

Matthew Voss
District 11 Environmental Division
California Department of Transportation
4050 Taylor Street, San Diego, CA, 92110

Or send your request via email to: matthew.voss@dot.ca.gov Or call: (858) 289-1276

Please provide the following information in your request:

Project title: I-15 Pavement and Asset Improvement Project

General location information: I-15

District number-county code-route-post mile: 11-SD-15-M26.8/R52.1

Project ID number: 43162/1122000220