SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

ITEM: 3.38
(ID # 27123)
MEETING DATE:
Tuesday, March 11, 2025

FROM : TLMA-TRANSPORTATION

SUBJECT: TRANSPORTATION AND LAND MANAGEMENT AGENCY/TRANSPORTATION DEPARTMENT: Intent to Adopt the Final Initial Study with Mitigated Negative Declaration and Approve the Railroad Avenue Bridge Replacement Project near Whitewater in Riverside County, District 5. [$0 Total Cost]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Adopt a Final Initial Study with Mitigated Negative Declaration and adopt a Mitigation Monitoring and Reporting Program based on the findings in the Initial Study and the conclusion that the project will not have a significant effect on the environment through the incorporation of mitigation measures;

2. Approve the Railroad Avenue Bridge Replacement Project; and

3. Direct the Transportation Department to file the Notice of Determination with the County Clerk and the State Clearinghouse for posting within five (5) working days of the project approval by the Board.

ACTION:Policy

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Gutierrez, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes:	Medina, Spiegel, Washington, Perez and Gutierrez
Nays:	None
Absent:	None
Date:	March 11, 2025
xc:	TLMA-Transp., State Clearinghouse, Recorder

Kimberly A. Rector
Clerk of the Board
By: _____
Deputy

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	N/A	N/A	N/A	N/A
NET COUNTY COST	N/A	N/A	N/A	N/A

SOURCE OF FUNDS: Federal Highway Bridge Program (HBP) Funds (100%). There are no General Funds used in this project.	**Budget Adjustment:** N/A **For Fiscal Year:** 24/25

C.E.O. RECOMMENDATION: Approve

BACKGROUND:
Summary

The County of Riverside, in cooperation with the California Department of Transportation (Caltrans), proposes to replace the following two (2) existing scour critical and structurally deficient timber bridges along Railroad Avenue near Whitewater in Riverside County:

- Railroad Avenue Bridge over Fornat Wash (Br. No. 56C0099)
- Railroad Avenue Bridge over East Channel Stubbe Wash (Br. No. 56C0101)

The proposed Project would replace the existing 2-lane timber bridges with new 2-lane modern concrete bridges. The proposed road width would consist of two 12-foot-wide travel lanes, one lane in each direction, and a 4-foot-wide shoulder on each side. Modern traffic barriers/railings meeting current Caltrans safety design standards would be constructed. The proposed bridges would be approximately 60 feet long depending on the channel hydraulic capacity and water surface freeboard requirements. Potentially, the elevation of Fornat Wash Bridge may increase, by no more than two feet to meet freeboard requirements. The East Channel Stubbe Wash Bridge elevation would remain the same. Additionally, approach roadway improvements would be provided, and channel improvements would be constructed to avoid future scour problems. The channel bottom would remain earthen.

An existing underground telephone line along the north side of Railroad Avenue and suspended along the north side of the East Channel Stubbe Wash bridge would be affected by construction and may require relocation. All construction activities would be conducted within the existing roadway right of way with construction staging and material laydown areas on the roadway itself. Railroad Avenue between the two bridges to be replaced would be closed to continuous traffic during construction.

The duration of construction is anticipated to be about 12 months. Both bridges are expected to be built simultaneously. Construction activities will be planned to ensure access to UPRR facilities and adjacent utilities via the Haugen-Lehmann Way/I-10 Interchange or the Main

Street/I-10 Interchange. A Traffic Control Plan (TCP) would be prepared to address road closure and access to local utilities and properties.

The proposed construction would require a temporary construction easement from UPRR for access to the channel bottom. However, construction activities are expected to stay at least 50 feet from the live rail tracks to eliminate any effects on railroad operation. The Railroad Avenue bridges abut adjacent State bridges (Br. No. 56-166 and Br. No. 56-168) that carry I-10 traffic over the same washes. An encroachment permit from Caltrans District 8 to construct improvements abutting Caltrans right of way would be obtained prior to construction.

The preparation of the environmental documentation for this Project is consistent with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The County of Riverside is the lead agency for CEQA and based on delegation by the Federal Highway Administration, the California Department of Transportation (Caltrans) is the lead agency for NEPA. As the lead agency under CEQA, the County prepared an Initial Study (IS) with proposed Mitigated Negative Declarations (MND) in order to analyze the proposed Project's impacts to the environment.

The Draft IS/MND was circulated for a 30-day public review period from June 28, 2023 to July 27, 2023. Physical copies of the documents were made available for public review at the County of Riverside Transportation Department office, Cabazon Public Library in Cabazon and an electronic copy of the document and technical studies was made available online at the County Transportation Department Project website.

The public was notified of the availability of the document through a Notice of Availability (NOA) of a Draft IS and a Notice of Intent (NOI) to adopt a Proposed MND for the Project. The NOA/NOI was mailed to federal, state and local agencies, tribal governments, utility companies and to property owners within a 500-foot radius of the Project site. In addition, the NOA/NOI was posted at the Riverside County Clerk's office and published in the Desert Sun in English and La Prensa in Spanish.

Furthermore, a virtual public meeting was held during the public circulation period. The meeting was on July 12, 2023. Public comments were received, and the County has prepared responses to these comments which have been incorporated into the Final IS/MND. Based on the study's findings, the County has determined that the proposed Project will not have a significant effect on the environment because potential effects would be mitigated to a less than significant level through the incorporation of mitigation measures.

The adoption of the (IS/MND) and the Mitigation Monitoring and Reporting Program (MMRP) for the Project will complete the CEQA environmental documentation for the Project. Caltrans, as the NEPA lead Agency has issued a Categorical Exclusion.

Final design will begin after approval of the Final IS/MND and will be completed in 2026. Construction is expected to begin in 2027.

All documents are located at the Riverside County Transportation Department at 3525 14th Street, 2nd Floor, Riverside, CA 92501. As part of the adoption of the IS/MND, the Board hereby considers the IS/MND with all comments provided on the document and determines that, based upon the whole record before it, that with the incorporation of mitigation, there is no substantial evidence that the project will have a significant effect on the environment and that the IS/MND reflects the lead agency's independent judgment and analysis.

Impact on Residents and Businesses

The new bridges would be in the same location and would replace the existing timber bridges with new modern concrete bridges. The bridges are being replaced so that the roadway can meet current vehicle load and safety standards.

Additional Fiscal Information

The Board's approval of the CEQA documents will facilitate the Project moving forward. Funding will be 100% HBP Funds. There are no General Funds used in this project.

Contract History and Price Reasonableness

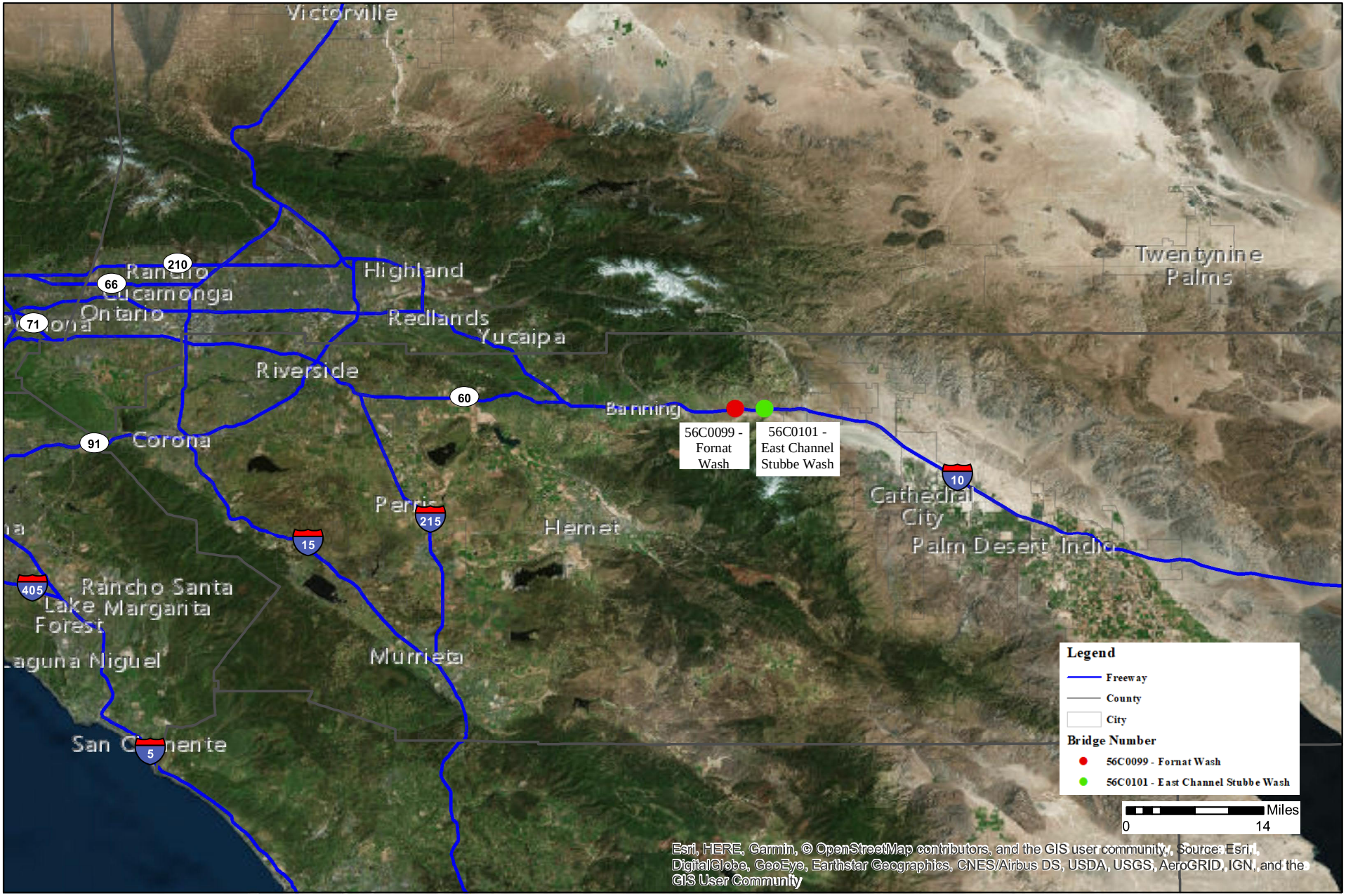
N/A

ATTACHMENTS:

Vicinity Maps (Regional and Local)
Final IS/MND
NOA/NOI
Notice of Determination

Jason Farin, Principal Policy Analyst 3/5/2025

Regional Map - Railroad Avenue



Project Location - Railroad Avenue Bridges

FINAL

Initial Study/Mitigated Negative Declaration

Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and East Channel Stubbe Wash (Br. No. 56C0101)

Riverside County, California

Federal Aid Project Numbers: BRLO 5956[228], BRLO 5956[229]

Prepared for:

County of Riverside Transportation Department
3525 14th Street
Riverside, California 92501

Prepared by:
WSP USA
862 E Hospitality Ln #350
San Bernardino, CA 92408

January 2025

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List of Acronyms

A	
AB	Assembly Bill
ACM	Asbestos-Containing Materials
ADL	Aerially Deposited Lead
ADT	Average Daily Traffic
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASR	Archaeological Survey Report
ATP	Active Transportation Plan
B	
BMP	Best Management Practice
BSA	Biological Study Area
C	
CA CGP	California Construction General Permit
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Aire Resources Board
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CLOMR	Conditional Letter of Map Revision
CNDDB	California Natural Diversity Database
County	County of Riverside Transportation Department
CRHR	California Register of Historic Resources
CVMSHCP	Coachella Valley Multiple Species Habitat Conservation Plan

CVCC	Coachella Valley Conservation Commission
D	
dB Lmax	Maximum sound level
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
E	
EBL	Eligible Bridge List
EIR	Environmental Impact Report
EPA CGP	Environmental Protection Agency Construction General Permit
F	
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
H	
HCP	Habitat Conservation Plan
HEC-RAS	Hydrologic Engineering Center – River Analysis System
HPSR	Historic Properties Survey Report
HRER	Historic Resources Evaluation Report
I	
I	Interstate
ILFP	In Lieu fee program
IRWM	Integrated Regional Water Management (San Gorgonio)
IS	Initial Study
J	
JPR	Joint Project Review
L	
LBP	Lead-Based Paint
LHS	Location Hydraulic Study
LOMR	Letter of Map Revision
M	
MMRP	Mitigation Monitoring and Reporting Plan
MLD	Most Likely Descendent

MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
N	
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NES(MI)	Natural Environment Study Minimal Impact
NFIP	National Flood Insurance Program
NOD	Notice of Determination
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
P	
PAP	Pass Area Plan
PCT	Pacific Crest Trail
PRC	Public Resources Code
PRIMP	Paleontological Resource Impact Mitigation Program
PTS	Paint and Thermoplastic Striping
PWB	Priority Wildlife Barrier
R	
RCFC&WCD	Riverside County Flood Control & Water Conservation District
Report	Hydraulics and Scour Study Report
ROW	Right-of-Way
RSP	Rock Slope Protection
RWQCB	Regional Water Quality Control Board
S	
SC	Source Control
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SD	Site Design
SFER	Summary Floodplain Encroachment Report
SWPPP	Storm Water Pollution Prevention Plan

T	
TCE	Temporary Construction Easement
TCP	Traffic Control Plan
TWW	Treated Wood Waste
U	
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
W	
WCD	Water Conservation District
WCVAP	Western Coachella Valley Area Plan
WEAP	Worker Environmental Awareness Program
WRCOG	Western Riverside Council of Governments

1 Introduction

1.1 Introduction

The California Environmental Quality Act (CEQA) is a statewide environmental law contained in Public Resources Code (PRC) §§ 21000-21177. It applies to most public agency decisions to carry out, authorize, or approve actions that have the potential to adversely affect the environment. This Initial Study (IS) evaluates resource areas found in the CEQA Environmental Checklist provided in Section 3. This document is intended for use by the County of Riverside Transportation Department (County) as the CEQA lead agency, responsible agencies, and members of the public in evaluating the physical environmental effects resulting from planning and constructing the proposed Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and East Channel Stubbe Wash (Br. No. 56C0101) (Project).

The Initial Study is organized as follows:

Section 1. *Introduction* provides the purpose of this Initial Study, its intended use, and its public review process.

Section 2. *Project Setting and Description* provides details of the Project location, background, description, and purpose. This section also identifies required permits, approvals, or agreements for the Project.

Section 3. *Initial Study Checklist* provides a summary of the environmental factors potentially affected by the Project and a significance determination. This section also analyzes the potential effects the Project may have on the environment and identifies potential avoidance, minimization, and/or mitigation measures that would reduce or minimize the Project's effects on the environment.

Section 4. *References* catalogs details of in-text citations used in the document.

Section 5. *Preparers* list federal, state, or local agency personnel, including consultants, who were primarily responsible for preparing this document.

Section 6. *List of Technical Studies* identifies all technical studies prepared for the Project.

Appendices. Includes the MMRP, AB52 Consultation log, Responses to Public Comments, and CVCC Coordination Letter (May 2024).

1.2 Purpose

The objective of this IS is to inform County decisionmakers, representatives of other affected/responsible agencies, the public, and interested parties of the potential environmental consequences of the Project. Determining whether a project may have a significant effect plays a critical role in the CEQA process. If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, the agency shall prepare a draft EIR. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is

not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area.

In evaluating the significance of the environmental effect of a project, the lead agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

The overall objective of this IS will be to provide the County with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND). As identified in CEQA Guidelines Section 15063(c), the purposes of an IS are to:

1. Provide the Lead Agency with information to use as the basis for deciding whether to prepare an EIR or a ND.
2. Enable an applicant or Lead Agency to modify a project, mitigating adverse impacts, before an EIR is prepared, thereby enabling the project to qualify for a ND.
3. Assist in the preparation of an EIR, if one is required, by:
    a. Focusing the EIR on the effects determined to be significant,
    b. Identifying the effects determined not to be significant,
    c. Explaining the reasons for determining that potentially significant effects would not be significant, and
    d. Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.
4. Facilitate environmental assessment early in the design of a project;
5. Provide documentation of the factual basis for the finding in a ND that a project will not have a significant effect on the environment;
6. Eliminate unnecessary EIRs;
7. Determine whether a previously prepared EIR could be used with the project.

1.3 Intended Use of this Initial Study

This IS evaluates the potential environmental impacts that may result from implementing the proposed Project. The document provides technical and environmental analyses for support in determining the significance of environmental impacts. The determination evaluates whether the Project would have no impact, a less than significant impact, a less than significant impact with the implementation of mitigation measures, or a significant impact even if mitigation measures are implemented. Below is a description of the evaluation of environmental impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g.,

the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analyses Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

The County used the substantial evidence provided in this document and the following technical studies prepared for the Project, to evaluate whether or not there are any significant environmental effects associated with implementation of the proposed Project. Based on these analyses, this IS supports adoption of an MND for the proposed Project.

- Biological Resources Technical Report
    - Natural Environmental Study (Minimal Impacts) (includes as appendix Jurisdictional Delineation Report).
- HPSR/ASR/HRER (Confidential- Not for Public Distribution)
- Initial Site Assessment and Supplemental Initial Site Assessment
- Location Hydraulic Study and Summary Floodplain Encroachment Report
- Paleontological Technical Memorandum
- Section 4(F) Evaluation
- Traffic Technical Memorandum
- Visual Impact Assessment Memorandum
- Water Quality Assessment Report

1.4 Public Review of this Initial Study

Public participation in the environmental review process is an essential part of the CEQA process and can help to identify public concern or additional environmental factors that should be considered. To facilitate public involvement in the CEQA review of this Project the County has made available a copy of this IS at the following locations:

- Online at: https://rcprojects.org/railroadbridges
- County of Riverside Transportation Department (3525 14th Street, Riverside, CA 92501).
- Cabazon Public Library (50425 Carmen Ave, Cabazon, CA 92230)

In addition, the technical studies prepared in support of the IS are also available for review on the Project website except for the cultural resources reports, which are confidential and not for public distribution.

A 30-day public circulation period will begin June 28, 2023, and ends July 27, 2023. Written comments relating to this IS should be addressed to:

> County of Riverside Transportation Department
> Attn: Frances Segovia, Senior Transportation Planner
> 3525 14th Street, Riverside, CA 92501
> Submit comments via email no later than July 27, 2023, to: fsegovia@rivco.org

After the public circulation period, consideration of comments raised during the public review period will be considered and addressed prior to adoption of the MND by the County.

1.5 Response to Public Comments

CEQA requires that the Project decision makers consider the comments received during the public review of the Initial Study/Mitigated Negative Declaration prior to carrying out or approving the project (CEQA Guidelines Section 15074[b]). As previously stated in Section 1.4, the Initial Study/Mitigated Negative Declaration (State Clearinghouse No. 2023060768) was circulated to the public and public agencies for a 30-day public review from June 28, 2023 through July 27, 2023. A virtual public meeting was held on July 12, 2023.

The County received 18 comment letters during the public review period. Refer to Appendix C for the comment letters and responses.

Based on the comments received, revisions to the Draft IS/MND were required; revisions to the IS/MMD are identified by a line in the margin of the document. Revisions include:

- Updates to the List of Acronyms
- Additions to the Appendices (Appendix C and Appendix D)
- Updates to Section 3.4, Biological Resources
- Updates to Section 3.17, Transportation
- Revisions to six measures (BIO-2, BIO-4, BIO-5, BIO 7, BIO-9, and TRA-1)
- Updates to Section 4, References
- Addition of four new Figures (Figure 5, Figure 6, Figure 11, and Figure 12)
- Addition of two new Tables (Table 6 and Table 7)

As described in Section 15073.5 of the CEQA Guidelines, a lead agency must recirculate a negative declaration when the document is substantially revised after public notice of its availability. However, neither the comments, responses to comments, nor the stated revisions constitute “significant new information” that would require recirculation of the MND or the preparation of an EIR.

2 Project Setting and Description

1. **Project Title:**
   Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and over East Channel Stubbe Wash (Br. No. 56C0101).

2. **Lead Agency Name and Address:**
   County of Riverside Transportation Department
   3525 14th Street
   Riverside, CA 92501

3. **Contact Person and Phone Number:**
   Frances Segovia, Senior Transportation Planner
   (951) 955-1646

4. **Project Location:**
   Along Railroad Avenue near Whitewater in Riverside County between Haugen-Lehmann Way east and Main Street west and south of Interstate 10 (I-10).

5. **Project Sponsor's Name and Address:**
   County of Riverside Transportation Department
   3525 14th Street
   Riverside, CA 92501

6. **General Plan Designation:**
   Rural Desert, Rural Residential, Tribal Lands - Bridge over Fornat Wash
   Open Space Rural - Bridge over East Channel Stubbe Wash

7. **Zoning:**
   Controlled Environmental (W-2-5) and Rural residential (R-R) - Bridge over Fornat Wash
   Rural residential (R-R) – Bridge over East Channel Stubbe Wash

8. **Project Description:**
   The County of Riverside (County), in cooperation with the California Department of Transportation (Caltrans), proposes to replace the following two (2) existing scour critical and structurally deficient timber bridges along Railroad Avenue near Whitewater in Riverside County, California (see **Figure 1**):

   - Railroad Avenue Bridge over Fornat Wash (Br. No. 56C0099)
   - Railroad Avenue Bridge over East Channel Stubbe Wash (Br. No. 56C0101)

   Railroad Avenue is an approximately 5-mile stretch of road that runs parallel to Interstate 10 (I-10) and the Union Pacific Railroad (UPRR). It connects the Haugen-Lehmann Way

and I-10 Interchange at the east end and Main Street and I-10 Interchange at the west end (see **Figure 2**). It mostly serves the sparsely populated Cabazon community. The average daily traffic (ADT) volume is approximately 211 vehicles. Periodically, the road carries detoured traffic from the heavily traveled I-10 when the freeway is temporarily closed for construction or emergency incidents. The road also serves as an access route for UPRR and utility maintenance crews. Therefore, it is important to maintain this frontage road in sound condition at all times.

The existing timber bridges carry two lanes (one lane in each direction) of traffic over Fornat and East Channel Stubbe Washes. The timber bridges are approximately 59 feet long and are 32 feet wide from curb-to-curb. The County proposes replacing the existing two 2-lane timber bridges along Railroad Avenue with new 2-lane modern concrete bridges with a curb-to-curb roadway width of 32 feet at the same locations.

The bridges are listed in the federal Eligible Bridge List (EBL) as "Structurally Deficient" with a low Sufficiency Rating between 59.1 and 62.9. A sufficiency rating is essentially an overall rating of a bridge's fitness for the duty that it performs. The rating is based on a bridge's structural evaluation, functional/geometric obsolescence, and its essentiality to the public. A low sufficiency rating may be due to structural defects, narrow lanes, low vertical clearance, or any of many possible issues. A bridge is healthy when its Sufficiency Rating is more than 80.0. Bridges with Sufficiency Rating equal to or less than 80.0 and more than 50.0 require rehabilitation or widening. When the Sufficiency Rating falls less than 50.0, bridge replacement shall be considered for public safety. Although the Railroad Avenue bridges carry a status flag of Structurally Deficient with Sufficiency Rating ratings between 50 and 80 (qualifying for major rehabilitation), it was determined that the bridges are far beyond their 50-year service life, and it would be more cost-efficient to replace the bridges. Additionally, a scour Plan of Action was performed on the bridges by the County in 2013. The Plan of Action recommended total replacement of the bridges as the most cost-effective option due to the extent of the scour, structural instability and deterioration of various timber bridge elements.

The proposed Project would replace the existing 2-lane timber bridges with new 2-lane modern concrete bridges. The proposed road width would consist of two 12-foot-wide travel lanes, one lane in each direction, and a 4-foot-wide shoulder on each side. Modern traffic barriers/railings meeting current Caltrans safety design standards would be constructed. The proposed bridges would be approximately 60 feet long depending on the channel hydraulic capacity and water surface freeboard requirements. Potentially the elevation of Fornat Wash Bridge may increase, but by no more than two feet to meet freeboard requirements. The East Channel Stubbe Wash Bridge elevation would remain the same. Additionally, approach roadway improvements would be provided, and channel improvements would be administered to avoid future scour problems. It is envisioned that the channel bottom would remain earthen.

An existing underground telephone line along the north side of Railroad Avenue and suspended along the north side of the East Channel Stubbe Wash bridge would be affected by construction and may require relocation.

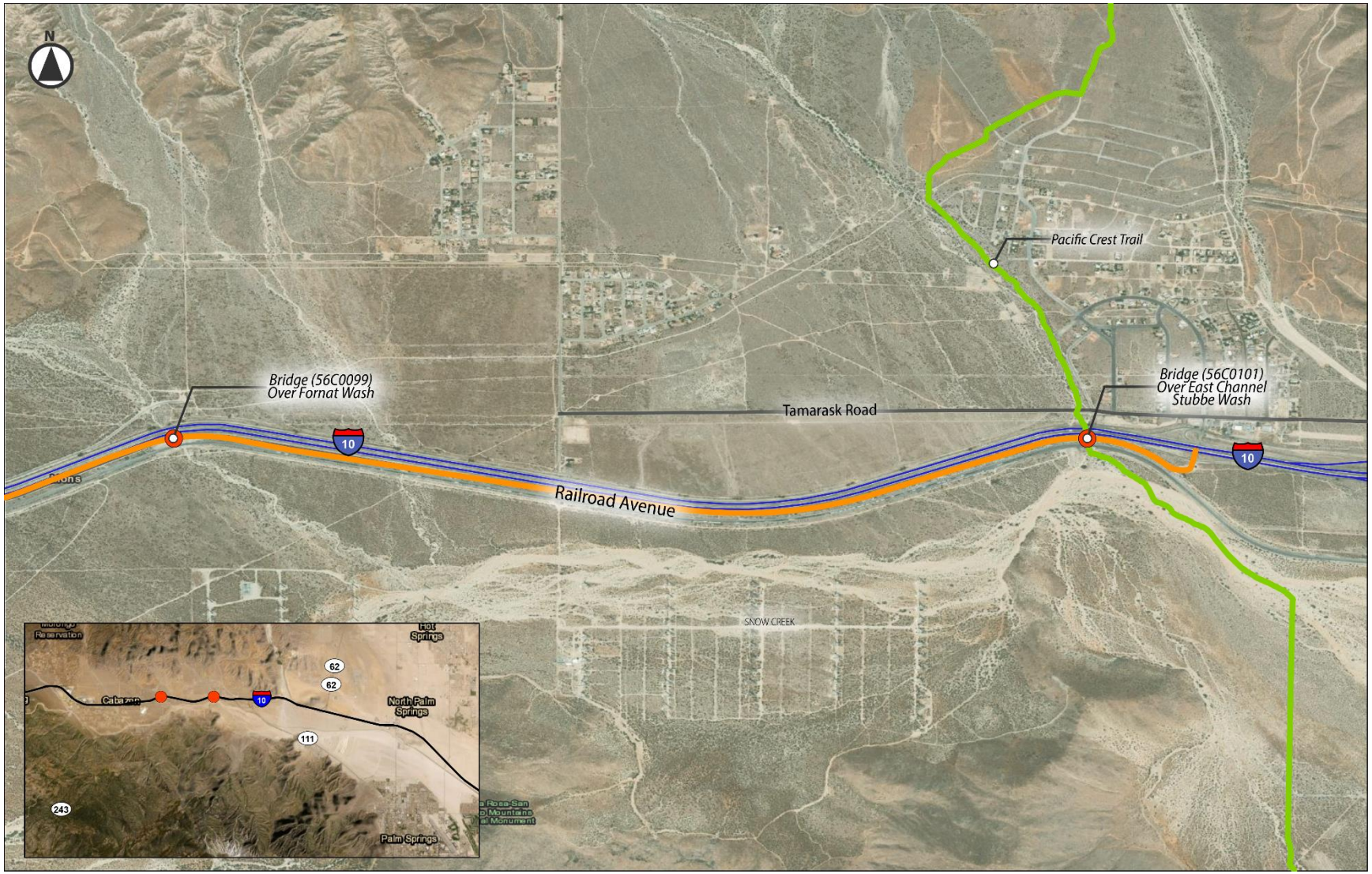
All construction activities would be conducted within the existing roadway right of way with construction staging and material laydown areas on the roadway itself. Railroad

Avenue between the two bridges to be replaced would be closed to continuous traffic during construction. The duration of construction is anticipated to be about 12 months (6 months per bridge). It is envisioned that the two bridges would be constructed one at a time to allow access to UPRR facilities and adjacent utilities from the Haugen-Lehmann Way/I-10 Interchange or the Main Street/I-10 Interchange. A Traffic Control Plan (TCP) would be prepared to address closure of the road and access to local utilities and properties.

The proposed construction would require a temporary construction easement from UPRR for access to the channel bottom. However, construction activities are expected to stay at least 50 feet from the live rail tracks to eliminate any effects on railroad operation. The Railroad Avenue bridges abut adjacent State bridges (Br. No. 56-166 and Br. No. 56-168) that carry I-10 traffic over the same washes. Structural modifications to the State bridges are not anticipated; however, this will be evaluated during design. An encroachment permit from Caltrans District 8 to construct improvements abutting Caltrans right of way would be obtained prior to construction.

Figure 1. Regional Location

Figure 2. Project Location



9. Surrounding Land Uses and Setting:

The Project is set within Rural Residential and Open Space Rural land uses. The nearest community to the Project area is the I-10 Haugen Lehmann Avenue Community neighborhood which is approximately 0.3-miles northeast. North of Railroad Avenue is the I-10, and south of Railroad Avenue is the UPRR rail corridor. The Pacific Crest Trail bypasses (by going underneath) Railroad Avenue at the East Channel Stubbe bridge. The Railroad Avenue bridge over Fornat Wash is located just west of the Morongo Reservation (Bureau of Indian Affairs; U.S. Forest Service Tribal Connections). The Project staging area on the east roadway approach to Fornat Wash Bridge would encroach into the Tribal boundaries, however all construction would be within County right of way.

10. Other Agencies Whose Approval is Required:

Table 1 below lists the permits and approvals required for Project construction.

Table 1. Permits and Approvals

Agency	Permits, Licenses, Agreements, and Certifications	Status
Caltrans	Section 4(f) Approval from Caltrans as delegated by FHWA.	Approved on June 17, 2022.
Regional Water Quality Control Board	Section 401 for water discharge	Application for 401 permit expected after Final Environmental Document (FED) approval.
State Water Resources Control Board	California Construction General Permit (CA CGP) Coverage	Application for CA CGP coverage is expected after FED approval.
Environmental Protection Agency	Construction General Permit Coverage	Application for EPA CGP coverage is expected after FED approval.
United States Army Corps of Engineers	Section 404 Permit for filling or dredging waters of the United States.	Application for 404 permit expected after FED approval.
California Department of Fish and Wildlife	1602 Agreement for Streambed Alteration	Application for 1602 permit expected after FED approval.
United States Fish and Wildlife Service	Section 7 Consultation for Threatened and Endangered Species	Concurrence received on July 2, 2020.
State Historic Preservation Officer	Finding of Effect (FOE)	Concurrence received on June 7, 2022.
UPRR	Temporary Construction Easement (TCE)	Application for TCE permit expected prior to construction.
Caltrans	Encroachment Permit	Application for encroachment permit expected prior to construction.
Riverside County Department of Waste Resources - Lamb Canyon Landfill	Permit for disposal of Treated Wood Waste, as necessary	Application for Treated Wood Waste permit expected during construction, as necessary.

11. Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Assembly Bill (AB) 52 notification letters were sent on February 23, 2022, to four Native American Tribes to provide information on the proposed Project and initiate formal consultation, if desired. One of the four tribes responded to the letter. More details regarding consultation efforts to date can be found in Section of 3.18 Tribal Cultural Resources or Appendix B.

3 Initial Study Checklist

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this Project, with Less Than Significant Impact with Mitigation Incorporated, as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☒ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

The proposed Project would have no effect on: Agriculture and Forest Resources, Land Use/Planning, Mineral Resources, Population/Housing, and Public Services.

The proposed Project would have a Less than Significant Impact on: Aesthetics, Air Quality, Cultural Resources, Energy, Geology/Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Noise, Recreation, Transportation, Tribal Cultural Resources, Utilities/Service Systems, Wildfire, and Mandatory Findings of Significance.

The proposed Project would have a Less than Significant Impact with Mitigation Incorporated on: Biological Resources. Mitigation for impacts on this resource area includes the following:

BIO-4: Compensatory Mitigation for Replacement/Restoration of Jurisdictional Waters. Permanent and temporary impacts from the replacement of Fornat Wash Bridge (#56C0099) and East Channel Stubbe Wash Bridge (#56C0101) will require compensatory mitigation for jurisdictional waters. Compensation can be a combination of enhancement, restoration, and/or rehabilitation. Compensation can also occur through the option of permittee-responsible on- or off-site mitigation and will be determined in consultation with the USACE, RWQCB, and CDFW during the permitting phase. Temporary impacts will be restored with implementation of **BIO-1**. However, to ensure adequate compensatory mitigation is obtained, final mitigation ratios will be determined

in consultation with the USACE, RWQCB, and CDFW and would be at a minimum 1:1 ratio. Applications for permits (404, 401, 1602) will be submitted following adoption of the Final IS/MND.

Determination

On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Jan Bulinski _____ 1/29/2025

Jan Bulinski *Date*
Environmental Project Manager
County of Riverside Transportation Department

3.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Source(s): Information in this section is based on field visits and the *Visual Impact Assessment Memorandum* (April 2020).

Regulatory Setting:

CEQA policy requires the state to take all necessary action to provide the people of the state "with…enjoyment of aesthetic, natural, scenic and historic environmental qualities" (CA Public Resources Code [PRC] Section 21001[b]).

Environmental Setting:

The Project area is characterized by an expansive desert and is surrounded by prominent ridgelines of the San Bernardino and San Jacinto mountain ranges (or the San Gorgonio Pass [Pass]). The Pass is well-known for its windy conditions which supports thousands of wind turbines throughout the surrounding landscape. Shallow alluvial channels consisting of stony, gravelly loamy, and fine sands cross through the Project area. As ephemeral streams, these alluvial channels are often dry shallow beds with sparse vegetation.

The Pacific Crest Trail (PCT), one of the first federally designated National Scenic trails, crosses under the East Channel Stubbe Wash Bridge. The PCT is 2,650 miles long and stretches from the Mexican border to British Columbia. The 42-foot-long segment of the PCT that crosses the Project area was established about 43 years ago (circa 1974); however, it is assumed to have achieved historical significance as a part of the larger nationally significant trail, which has a period of significance from 1935 (Pacific Crest Trail System Conference) to 1993 (entire trail officially dedicated). The trail segment within the Project area is part of an alluvial wash and is simply a well-traveled path with no specific built features that identify the trail.

Land use within the Project area is primarily rural open space. The built setting is comprised of transportation infrastructure, including Railroad Avenue, I-10, and the UPRR tracks, and limited

rural development including low density residential neighborhoods and more urban development, such as warehouses. From Railroad Avenue, locally recognized and visually prominent natural and built features, such as the San Bernardino and San Jacinto Mountains (background), San Gorgonio Pass wind farm turbines (background), the UPRR (foreground), I-10 (foreground), and PCT (foreground) are visible (see **Figure 3** and **Figure 4**). Views from the bridges extend across the relatively flat desert environment to distant vistas encompassing large vertical features such as utility poles, billboard advertisements, freeway signs, trees, and structures, as well as the horizon. Railroad Avenue is classified as a local rural road and has no streetlights or sidewalk improvements.

Views of the bridge structures themselves are limited and can only be seen from the floor of the ditches as they are not elevated and are perpendicular to the I-10 and UPRR bridges. From Railroad Avenue, motorists may recognize the guardrails/barriers and metal warning paddle signs/reflectors along the sides of the bridges as bridge approaches.

Fornat Wash Bridge is situated approximately two feet above the wash floor with timber beams covered with peeling textured stucco. The structure appears to be in fair condition with some deterioration of the original timber stringers from debris flowing in the wash (See **Figure 3**).

East Channel Stubbe Wash Bridge is constructed of timber pile piers, concrete, and wood abutment walls. The deck stands approximately 12 feet above the wash floor and is coated with asphalt. The substructure consists of weathered timber beams and log piles. The structure appears to be in fair condition with some splitting of timbers in the center piers (See **Figure 4**).

The bridges' substructure materials and construction style are characteristic of the time at which they were built (circa early 1930's); however, the overall bridge structures have similar forms, elevations, and lines to that of the adjacent railroad and I-10 bridge structures. As seen from the channel washes, the bridges add to the rural character and unique past of the area, but from the roadway itself, the bridges are less notable.

Visual Resources

The PCT, one of the first federally designated National Scenic trails, crosses under the East Channel Stubbe Wash Bridge within the Project corridor. The PCT is 2,650 miles long and stretches from the Mexican border to British Columbia. The 42-foot long segment of the PCT that crosses the project corridor was established about 43 years ago (circa 1974); however, it is assumed to have achieved historical significance as a part of the larger nationally significant trail, which has a period of significance from 1935 (Pacific Crest Trail System Conference) to 1993 (entire trail officially dedicated). The trail segment within the project corridor is part of an alluvial wash and is essentially just a well-traveled path. There are no specific built features that identify the trail.

Railroad Avenue is not an officially designated State Scenic Highway. The I-10 freeway is eligible for inclusion in the State Scenic Highway System but is not officially designated as a State Scenic Highway. No officially designated scenic vistas have been identified for the Project. However, the following features are notable visual elements within the Project corridor:

The San Gorgonio Pass, known for its windy conditions and wind farms, is a unique visual landscape along the I-10 between Beaumont and North Palm Springs with its rows of wind turbines rising above the relatively flat desert floor.

Edging the I-10 are the San Bernardino and San Jacinto mountain ranges that dominate the landscape with their rocky slopes and jagged tops visible for miles from the freeway and surrounding roadways.

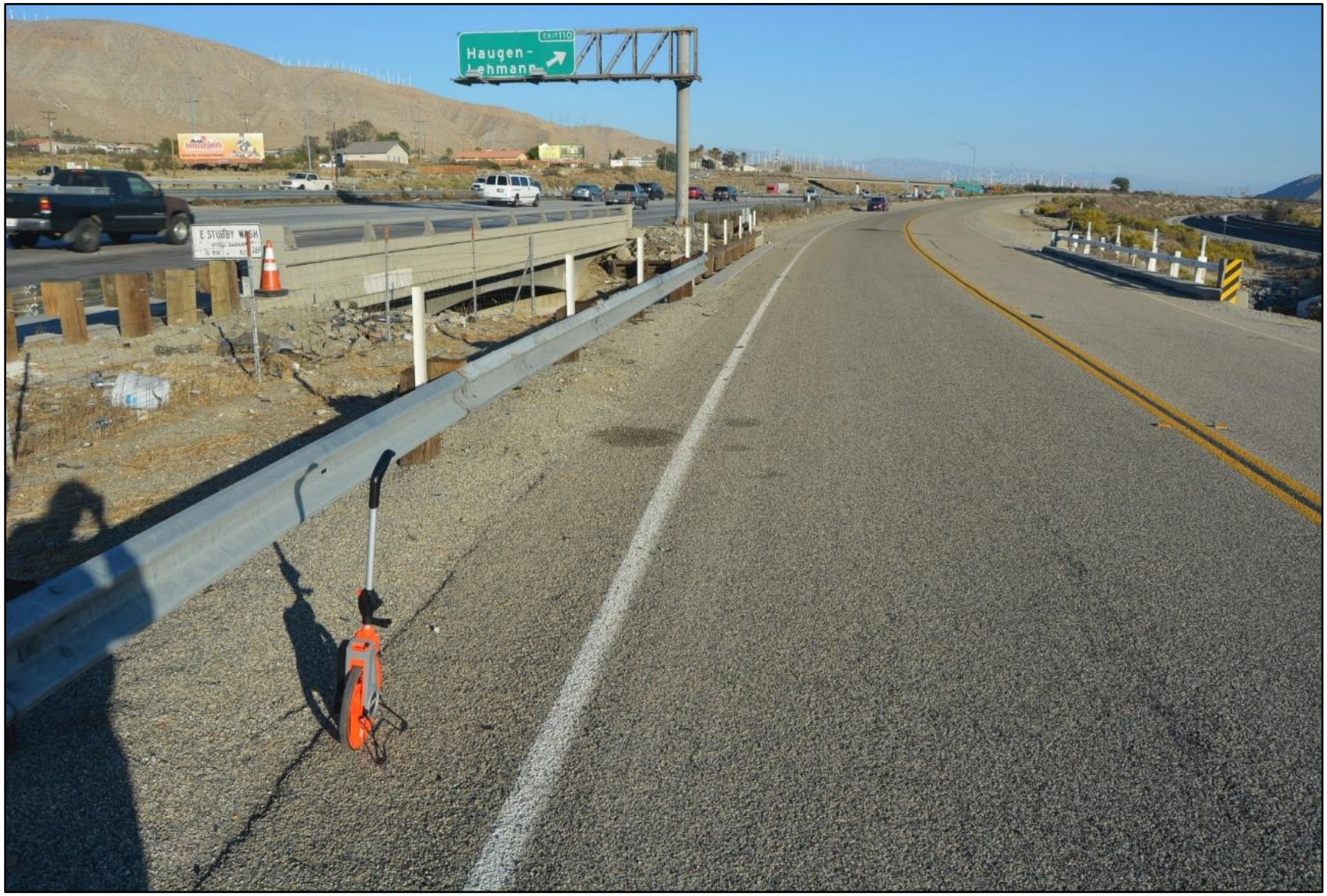
Viewers

Viewers within the project corridor consist of travelers on Railroad Avenue, which include utility and UPRR crews working in or traveling through the Project corridor, residents, recreationists, and occasionally I-10 traffic, and neighbors (motorists on I-10 and local residents). Viewers are considered to have various levels of sensitivity to visual changes based on their relationship to the Project and visual preferences. For example, residents are usually considered to have a high level of sensitivity to visual changes due to their proximity to the changes, duration in which they view the changes (every day) and visual expectations (sense of ownership of views and desire for aesthetically pleasant surroundings). Travelers are considered to have low to moderate sensitivity to visual changes based on the duration in which they can see the changes (speed of travel), familiarity with existing conditions (commuter who sees the same stretch of roadway every day would be more familiar with existing views) and visual preference (expectations for visual order, harmony and coherence). Visual sensitivity is typically expressed as a scale from low to high with the mid-range being moderate-low, moderate and moderate-high.

Residents are considered to have the most familiarity with views within the Project corridor and a high sensitivity to visual changes (residential neighborhoods are located north of I-10, which blocks views of the bridges for these viewers). Utility and UPRR crews, as well as recreationists are considered to have some familiarity with views within the corridor and would be expected to have a moderate sensitivity to visual changes. Motorists on Railroad Avenue most likely include residents, utility and UPRR crews, and recreationists and therefore, are considered to have a moderate-high level of sensitivity to visual changes due to their expected familiarity with existing views along the roadway. Motorists on I-10 include a variety of users, including those with some familiarity with views within the corridor and those that may be experiencing these views infrequently or for the first time. I-10 motorists are expected to have a low sensitivity to visual changes due to the speed in which they are traveling through the corridor (limited time to notice small details) and focus on task at hand (driving).

Figure 3. View from Bridge over Fornat Wash

Figure 4. View from Bridge over East Channel Stubbe Wash



Impact Analysis:

a) and b) No Impact. The Project area does not include any scenic vistas or scenic resources and is not located near a State Scenic Highway.

c) Less than Significant Impact. The proposed Project would replace the existing timber bridges with concrete elements and upgrade the barriers/railings to meet current Caltrans safety design. The roadway would not be realigned, and the bridges would maintain a similar height, width and length. The modern materials would be compatible with the materials used on the I-10 and UPRR bridges and would present a consistent and unified look. The linear form and scale of the roadway and bridges would be consistent with what currently exists. The upgrades would not affect the overall visual character of the rural desert landscape with limited urban or residential development.

Viewers in the Project area consist of travelers, residents, and recreationists. During construction, traveler's views to and from the roadway would be temporarily affected by the presence of large construction equipment, materials, crews, and signage. In addition, it is expected that some vegetation adjacent to the bridges and/or within the channel washes may be removed resulting in a change in surrounding views. Although visual impacts are anticipated to be temporary and minimal, implementation of minimization measures **BIO-1** and **VIA-1** would further reduce Project impacts.

Recreationalists' views when using the PCT may be affected during construction. The Project segment of the PCT would be closed to trail users requiring a detour west of the existing trail to an existing underpass at West Channel Stubbe Wash. Views of the East Channel Stubbe bridge structure and the visual experience for trail users would be affected throughout construction. Once construction is completed, this segment of the trail would be restored to its pre-construction condition, offering trail users the same quiet respite as they currently enjoy.

As viewed from the PCT, the wood piers and support beams of the East Channel Stubbe Wash bridge are an unusual element of the bridge structure and this segment of the trail. Removing the bridge and the rustic wooden understructure would result in a less than significant visual impact on those traversing the PCT. To further minimize this impact, measure **VIA-2** would be implemented as part of the Project.

d) No Impact. The Project would not install any new permanent lighting and construction would primarily be limited to daylight hours. Therefore, the Project is not anticipated to result in new light or glare sources that would affect day or nighttime views of the area.

Avoidance, Minimization, and/or Mitigation Measures:

The following minimization measures would be implemented as part of the Project to reduce potential impacts on aesthetic resources.

VIA-1: The construction contractor will preserve existing vegetation where feasible, use the existing roadway right of way for storage and laydown areas, limit construction to daylight hours, as feasible, and minimize the use of lighting to only what is required for directional and safety purposes to reduce the effects of construction on the visual environment.

VIA-2: The construction contractor will provide cost-effective, sculpted concrete and staining aesthetic treatment on the East Channel Stubbe Wash bridge that serves the Pacific Crest Trail.

BIO-1: Temporary Construction Areas. Post-construction, all temporary construction areas and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix. Ephemeral washes and their banks will be left with an earthen, sandy bottom. No riprap or other obstructive material will be placed under the new bridges.

3.2 Agriculture and Forestry Services

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Source(s): Information in this section is based on the California Department of Conservation Farmland Mapping and Monitoring Program, the 2016 Riverside County Important Farmland Map (California Department of Conservation 2016a), and a Williamson Act records search.

Regulatory Setting:

The Farmland Mapping and Monitoring Program produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. The maps are updated every two years with the use of a computer mapping system, aerial imagery, public review, and field reconnaissance.

CEQA requires the review of projects that would convert Williamson Act contract land to non-agricultural uses. The main purposes of the Williamson Act are to preserve agricultural land, to

encourage open space preservation and efficient urban growth. The Williamson Act provides incentives to landowners through reduced property taxes to discourage the early conversion of agricultural and open space lands to other uses.

Environmental Setting:

The California Department of Conservation Farmland Mapping and Monitoring program classifies the Project area as 'Other Land' and 'Grazing Land'. 'Other Land' is defined as land not included in any other mapping category (i.e., vacant and nonagricultural land surrounded by urban development and greater than 40 acres). 'Grazing Land' is land on which the existing vegetation is suited to the grazing of livestock.

Impact Analysis:

a) through e) No impact. No unique or prime farmlands or farmlands of statewide importance exist within the Project area and no conversion of prime farmland, unique or farmland of local importance would result from the Project. The proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract as there are no parcels under agricultural use or a Williamson Act contract within the Project area. There are no forests or timberlands within the Project area. As a result, no impact would occur, and no mitigation is required.

Avoidance, Minimization, and/or Mitigation Measures:

No impacts have been identified; therefore, no avoidance, minimization, and/or mitigation measures are required.

3.3 Air Quality

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Source(s): Information in this section is based on the Project GHG Emissions Analysis completed for the Project (July 2022), Federal Clean Air Act, California Clean Air Act, National Ambient Air Quality Standards, State Ambient Air Quality Standards, and the 2016 South Coast Air Quality Management District's Air Quality Management Plan.

Regulatory Setting:

The Federal Clean Air Act is the primary federal law that governs air quality while the California Clean Air Act is its companion state law. These laws and regulations by the United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) set standards for the concentration of pollutants in the air. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). NAAQS and State Ambient Air Quality Standards have been established for six transportation-related criteria pollutants that have been linked to potential health concerns: carbon monoxide (CO), nitrogen dioxide (NO2), ozone (O3), particulate matter (PM)—which is broken down for regulatory purposes into particles of 10 micrometers or smaller (PM10) and particles of 2.5 micrometers and smaller (PM2.5)—and sulfur dioxide (SO2).

The South Coast Air Quality Management District (SCAQMD) created regional and local compliance with the Federal Clean Air Act. The SCAQMD, which produced the 2016 Air Quality Management Plan (AQMP) to identify strategies for meeting state and federal ambient air quality standards, implements the state air quality program through coordination with local planning agencies. Through these coordinated efforts, estimated significant thresholds and required strategies to meet compliance standards are produced. A project that exceeds the SCAQMD significance threshold and cannot be corrected through implemented mitigation measures to reduce the level of impact, conflicts with the AQMP.

Environmental Setting:

The proposed Project is within two air basins, the bridge over Fornat Wash falls under the South Coast Air Basin (SCAB) and the bridge over East Channel Stubbe Wash falls under the Salton Sea Air Basin (SSAB). Both air basins fall under the SCAQMD jurisdiction and the 2016 AQMP.

Western Riverside County (west of the San Gorgonio Pass) is located within the SCAB, which includes all of Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino Counties. According to the AQMP adopted by the SCAQMD for the air basin, the worst air quality problem in the nation occurs in the SCAB. With very light average wind speeds, the basin atmosphere has a limited capability to disperse air contaminants horizontally.

The SSAB portion of Riverside County is separated from the SCAB region by the San Jacinto Mountains and from the Mojave Desert Air Basin to the east by the Little San Bernardino Mountains.

The Riverside County General Plan Air Quality Element provides the six-criteria air pollutant attainment status for each air basin within the county. As identified in the Air Quality Element, the SCAB and SSAB are designated as non-attainment areas for federal and state ozone (O_3) and Particulate Matter (PM_{10}) standards. The SCAB and SSAB are designated as attainment areas for federal and state Carbon Monoxide (CO), Sulfur Dioxide (SO_2), Nitrogen Oxide (NO_2), and Lead (Pb) standards.

Impact Analysis:

a) No Impact. During construction, short-term degradation of air quality may occur due to fugitive dust generated by construction activities involving vegetation clearing, bridge

demolition, site grading, and bridge reconstruction. Likewise, particulate emissions from diesel-powered construction equipment such as excavators, trucks, and pile drivers, may also impact air quality.

The SCAQMD's Road Construction Emissions Model, Version 8.1.0 was used to estimate construction emissions for the Project. As such, the construction phase regional emissions were compared to the SCAQMD's significance thresholds, which are as follows:

- 100 pounds per day of NOx
- 75 pounds per day of volatile organic compounds (VOC)
- 150 pounds per day of PM_{10}
- 55 pounds per day of $PM_{2.5}$
- 150 pounds per day of SO_x
- 550 pounds per day of CO
- 10,000 metric tons/year of carbon dioxide equivalent (CO2e) for industrial facilities

Projects with construction-related emissions that exceed any of these emission thresholds are considered significant.

Table 2 summarizes emissions of criteria pollutants per phase and the maximum emissions in pounds/day; emissions include both vehicle exhaust and fugitive dust.

Table 2. Estimated Construction Emissions of Criteria Pollutants (lbs/day)

Project Phase	NOx	VOC	Total PM_{10}	Total $PM_{2.5}$	SOx	CO
Grubbing/Land Clearing	0	0	0	0	0	0
Grading/Excavation	74.0	7.6	9.1	4.1	0.2	69.4
Drainage/Utilities/Sub-Grade	50.5	5.3	8.0	3.2	0.1	50.8
Paving	7.8	0.9	0.4	0.3	0.1	12.7
Maximum (pounds/day)	**74.0**	**7.6**	**9.1**	**4.1**	**0.2**	**69.4**
SCAQMD Threshold	**100**	**75**	**150**	**55**	**150**	**550**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

As shown in **Table 2**, construction emissions would not exceed SCAQMD thresholds and therefore, would not conflict with the SCAQMD AQMP. To further reduce the effects of construction activities on air quality, measures **GHG-1** through **GHG-3** would be implemented.

Once constructed, the Project would not increase the number of travel lanes or facilitate additional vehicle trips or traffic. Under Federal Regulations the Project is exempt from air quality conformity per 40 CFR 93.126 as a Safety-Railroad/Highway Crossing project. Projects exempt from conformity are generally those that are air quality neutral and include safety, mass transit, air quality (i.e., ride-share, bicycle and/or pedestrian facilities) and other, similar projects.

As an air quality neutral project, the Project would not conflict or obstruct implementation of the SQAQMD AQMP during project operation.

b) No Impact. The SCAB and SSAB are designated as non-attainment areas for federal and state O_3 (ozone is formed over time from VOC and NOx emissions) and PM_{10} standards. As noted in **Table 2**, the Project would not exceed the SCAQMD thresholds for these criteria pollutants during construction. And, as an air quality neutral project, the Project would not result in increased emissions.

c) Less than Significant Impact. A sensitive receptor is a person or population group who is particularly susceptible to health effects due to exposure to an air contaminant, such as children and the elderly. Sensitive receptors include schools, hospitals, retirement homes, and residences where occupants include these sensitive groups. The East Channel Stubbe Wash Bridge is about 0.30 miles south from the nearest sensitive receptor (residential area).

During construction, the Project would generate pollutants related to site clearing, grubbing, and demolition. Sensitive receptors may be exposed to airborne particulates (dust) and emissions (diesel-fueled vehicles); however, these effects would be short-term and would not exceed emission thresholds. To further minimize potential impacts on air quality, measures **GHG-1** through **GHG-3** would be implemented.

d) No Impact. According to the SCAQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005), land uses associated with odor complaints typically include agriculture, chemical plants, composting operations, dairies, refineries, and landfills. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors.

Project construction equipment including heavy duty or diesel-fueled equipment may emit objectionable odors. Construction-related odors would be short-term in nature and cease upon Project completion. No mitigation is required.

Avoidance, Minimization, and/or Mitigation Measures:

Implementation of the following minimization measures would address temporary air quality effects related to construction activities.

GHG-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions will be controlled by regular watering, or other dust preventive measures using the following procedures as specified in the South Coast Air Quality Management District Rules and Regulations:

- Onsite vehicle speed will be limited to 25 miles per hour;
- During clearing, grading, earthmoving, or excavation operations, areas being excavated or graded will be sufficiently watered to prevent excessive amounts of dust. Watering should occur at least twice daily with complete coverage preferable in the late morning and after work is done for the day;
- All soil material transported onsite or offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust;

- Areas disturbed by clearing, grading, earth moving, or excavation activities will be minimized to prevent excessive dust;
- Visible dust beyond the construction limits emanating from the Project will be prevented to the maximum extent feasible.

GHG-2: Ozone precursor emissions from construction vehicles will be controlled by maintaining equipment engines in good condition, and properly tuned per manufacturer's specifications, to the satisfaction of the resident engineer.

GHG-3: All trucks that are to haul excavated or graded material offsite will comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

3.4 Biological Resources

Would the Project:	**Significant and Unavoidable Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Source(s): Information in this section is based on the *Natural Environment Study (Minimal Impacts)* (February 2020) and *Jurisdictional Delineation Report* (May 2019).

Regulatory Setting:

Federal and State Special-Status Species

Under Section 7 of the Federal Endangered Species Act (FESA), federal agencies are required to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species or destroy or adversely modify designated critical habitat.

California enacted a similar law at the state level, the California Endangered Species Act (CESA), California Fish and Game Code Section 2050, et seq. The CESA emphasizes early consultation to avoid potential impacts to rare, endangered, and threatened species and to develop appropriate planning to offset project-caused losses of listed species populations and their essential habitats. Species listed under FESA and CESA that require a Biological Opinion under Section 7 may also need a Consistency Determination under Section 2080.1 of the California Fish and Game Code.

Under the Migratory Bird Treaty Act (MBTA), the killing, possessing, or trading of migratory birds is prohibited unless exempt by regulations prescribed by the Secretary of the Interior. The MBTA prohibits the possession of protected bird species and their nests, regardless of whether nests are active.

Birds of prey, such as owls and hawks, are protected in California under provisions of the State Fish and Game Code, which states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

Clean Water Act (1972)

The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The following are important CWA sections related to wetland and riparian habitat:

- Section 401 requires an applicant for a federal license or permit to conduct any activity, which may result in a discharge to waters of the U.S., to obtain certification from the state that the discharge will comply with other provisions of the act.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the U.S. Regional Water Quality Control Boards (RWQCBs) administer this permitting program in California. Section 402(p) requires permits for discharges of storm water from industrial/construction and municipal separate storm sewer systems (MS4s).
- Section 404 of the CWA establishes a regulatory program that provides that discharge of dredged or fill material cannot be permitted if a practicable alternative exists that is less damaging to the aquatic environment or if the nation's waters would be significantly degraded. The Section 404 permit program is run by the U.S. Army Corps of Engineers (USACE) with oversight by the U.S. EPA.

Environmental Setting:

The Project area occurs within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) in the Cabazon Conservation Area (Fornat Wash Bridge) and the Snow Creek/Windy Point Conservation Area (East Channel Stubbe Wash Bridge). The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. Conservation Areas are defined as land that provides core habitat for covered species, conserves natural communities, essential ecological processes, and secures biological corridors and linkages between major habitat areas. The Project is considered a covered activity under Section 7.3.1 of the CVMSHCP since it occurs within these Conservation Areas.

The Project's biological setting and affected environment was determined based on a Biological Study Area (BSA) for each bridge, which included the proposed Project disturbance limits and a 300-foot buffer around each bridge (see **Figure 7** and **Figure 8).**

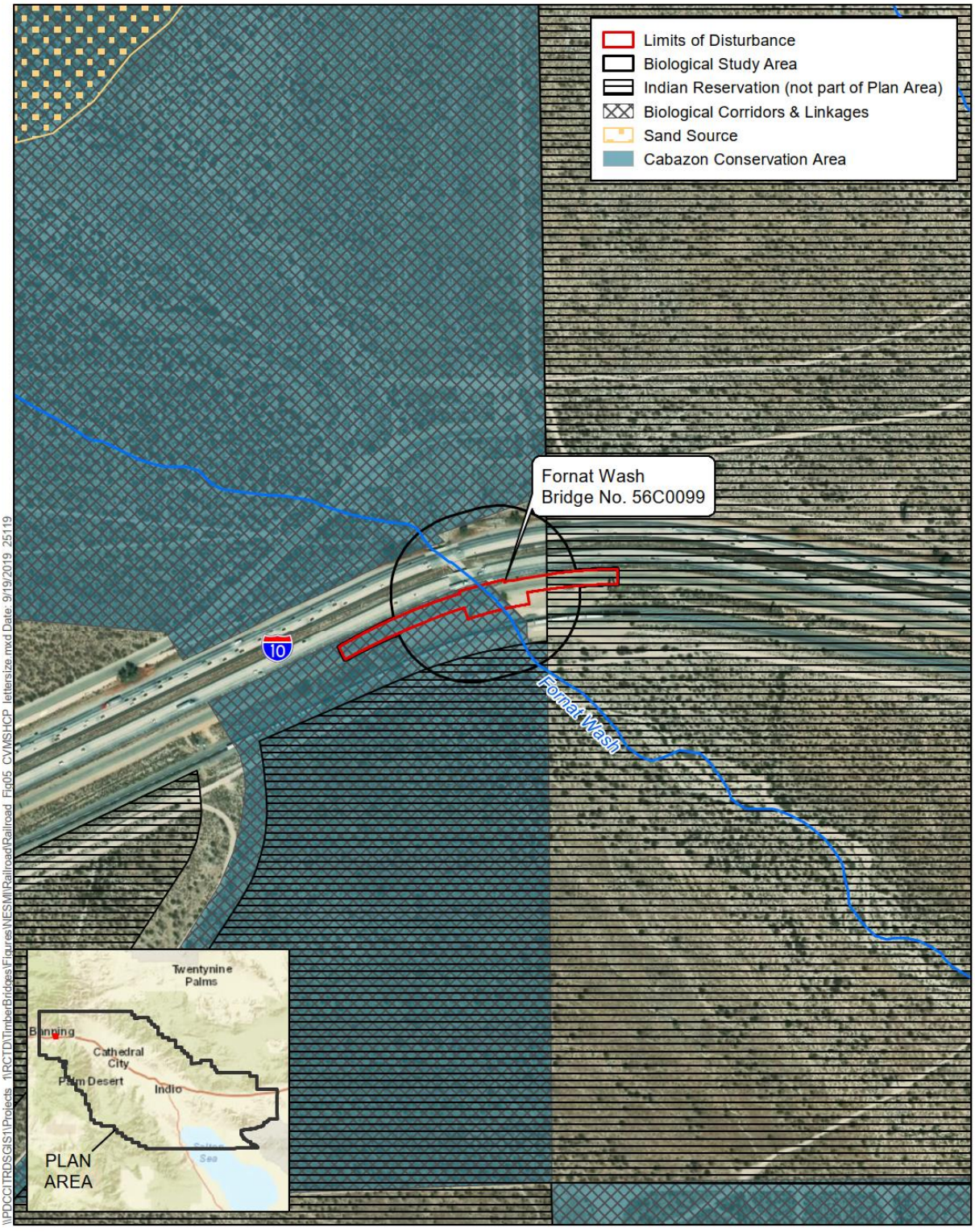
The BSA at Fornat Wash Bridge does not occur within the fluvial sand transport area of the biological corridor within the Cabazon Conservation Area (**see Figure 5**). However, the BSA at East Channel Stubbe Wash Bridge occurs at the northern edge of the Snow Creek/Windy Point Conservation Area and connects to the biological corridor for the Stubbe and Cottonwood Canyons Conservation Area to the north. The BSA at East Channel Stubbe Wash Bridge also provides sand transport, an important ecological process, through the San Gorgonio Pass (see **Figure 6**).

In both Conservation Areas, operation and maintenance activities for Railroad Avenue are listed as a Covered Activity in Section 7.3.1 of the CVMSHCP, indicating that mitigation measures for environmental impacts from any such activities have already been accounted for in the County's existing obligations under the CVMSHCP. Operation and maintenance activities include bridge maintenance such as deck and railing replacement, column replacement and reconstruction/placement of check dams. Operation and maintenance activities for Covered Activities are not required to go through the Joint Project Review (JPR) process.

The Project was confirmed to be a covered activity by the Coachella Valley Conservation Commission (CVCC) in September 2019 and exempt from the CVMSHCP JPR process. During the public review period, CVCC submitted a comment letter to the Draft IS/MND in July 2023 reconfirming Project to be a Covered Activity (see Appendix C, Comment G).

Furthermore, during additional consultation conducted between February and May of 2024 to provide the CVCC with Project design information, the CVCC once again confirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance, as described in Section 7.3.1.1 of the CVMSHCP (see letter dated May 22, 2024, Appendix D).

Figure 5. CVMSHCP Plan Area over Fornat Wash Bridge



N

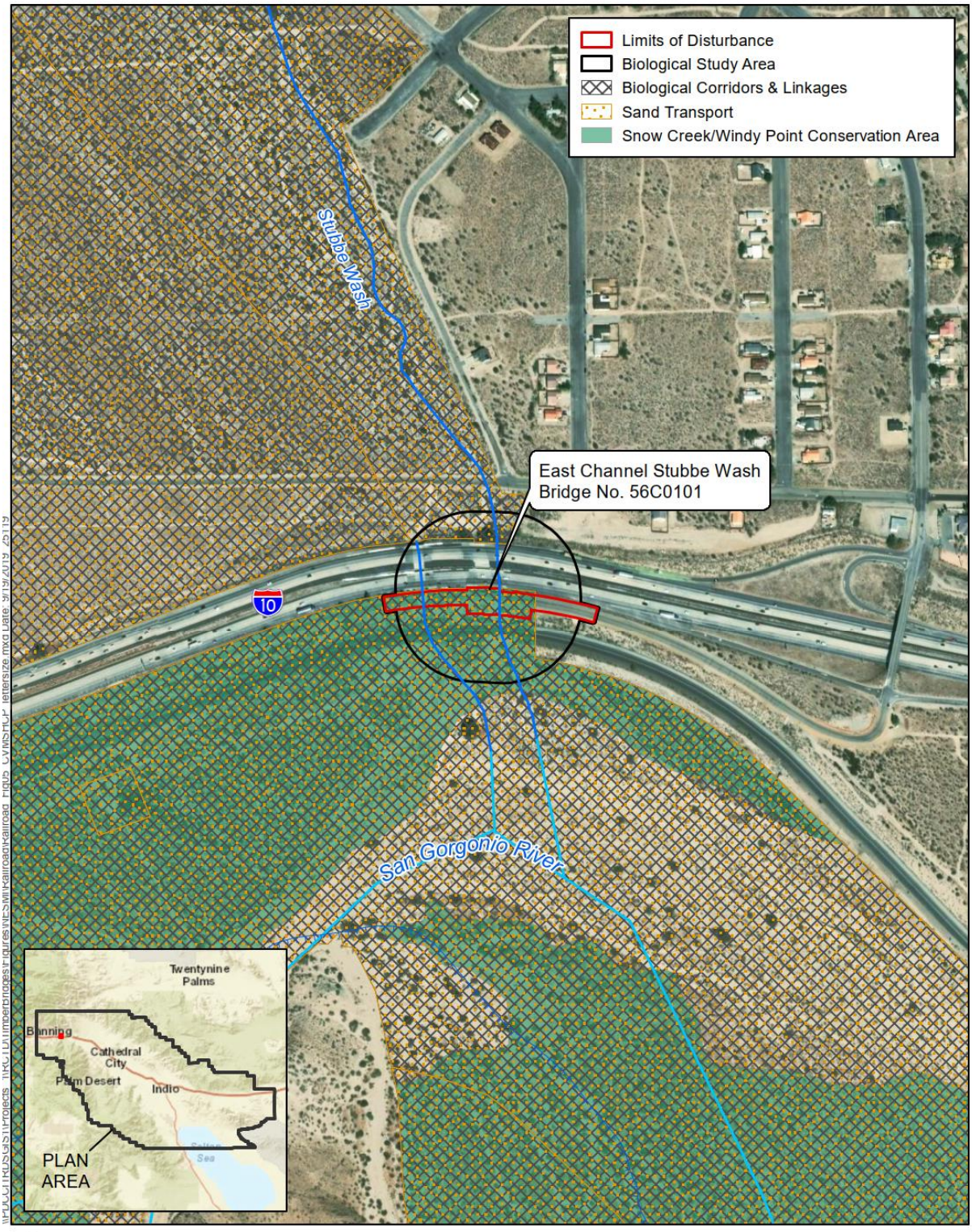
0 250 500

Feet

Source: ESRI Imagery (2016); CVAG

Figure 5 - Sheet 1
Coachella Valley Multiple Species Habitat Conservation Plan Area
Railroad Avenue Bridge over Fornat Wash (Br. No. 56C0099)
Railroad Avenue Bridge Replacement Projects

Figure 6. CVMSHCP Plan Area over East Channel Stubbe Wash



Source: ESRI Imagery (2016); CVAG

Figure 5 - Sheet 2
Coachella Valley Multiple Species Habitat Conservation Plan Area
Railroad Avenue Bridge over East Channel Stubbe Wash (Br. No. 56C0101)
Railroad Avenue Bridge Replacement Projects

Figure 7. Biological Study Area at Fornat Wash Bridge

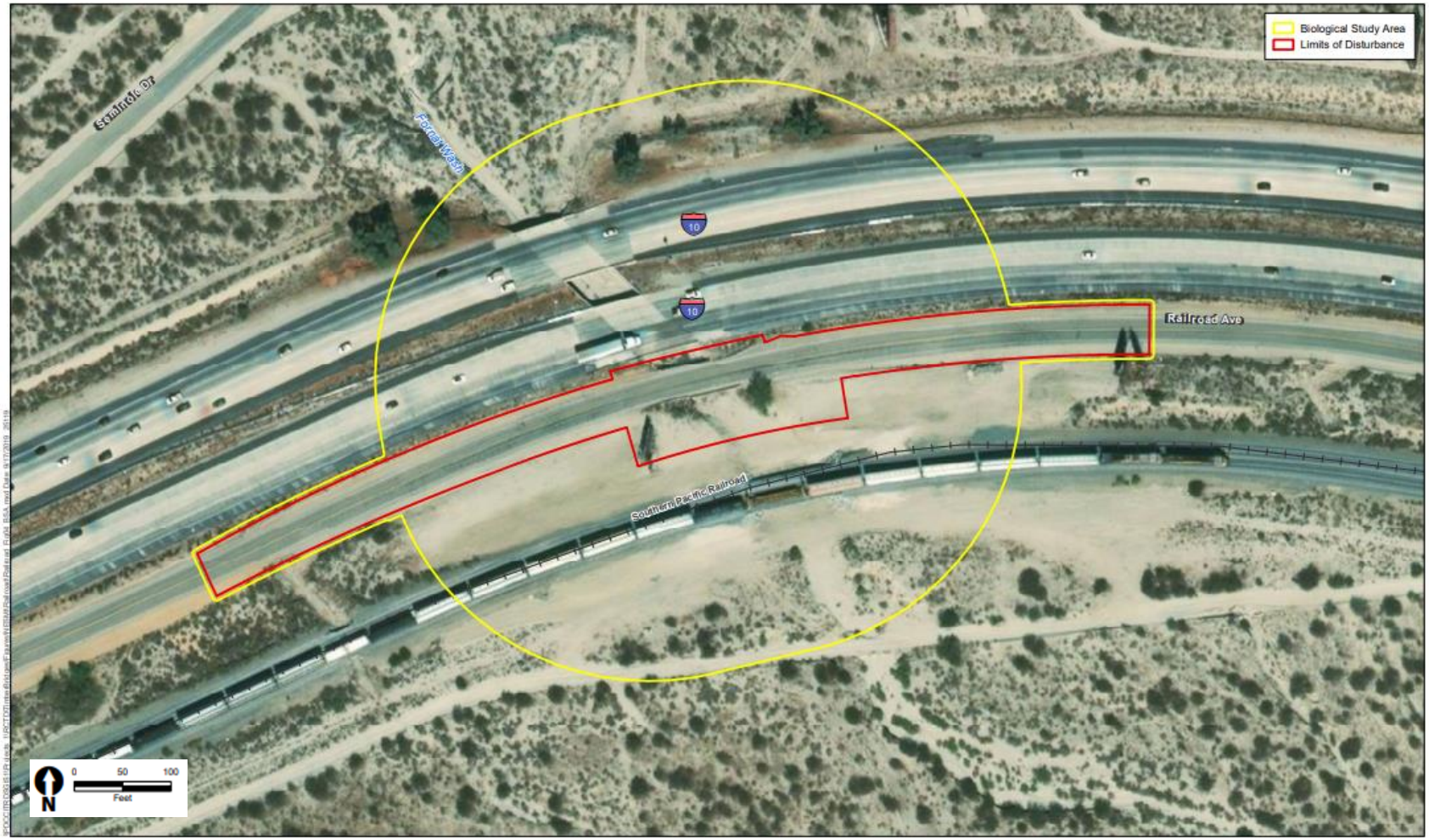
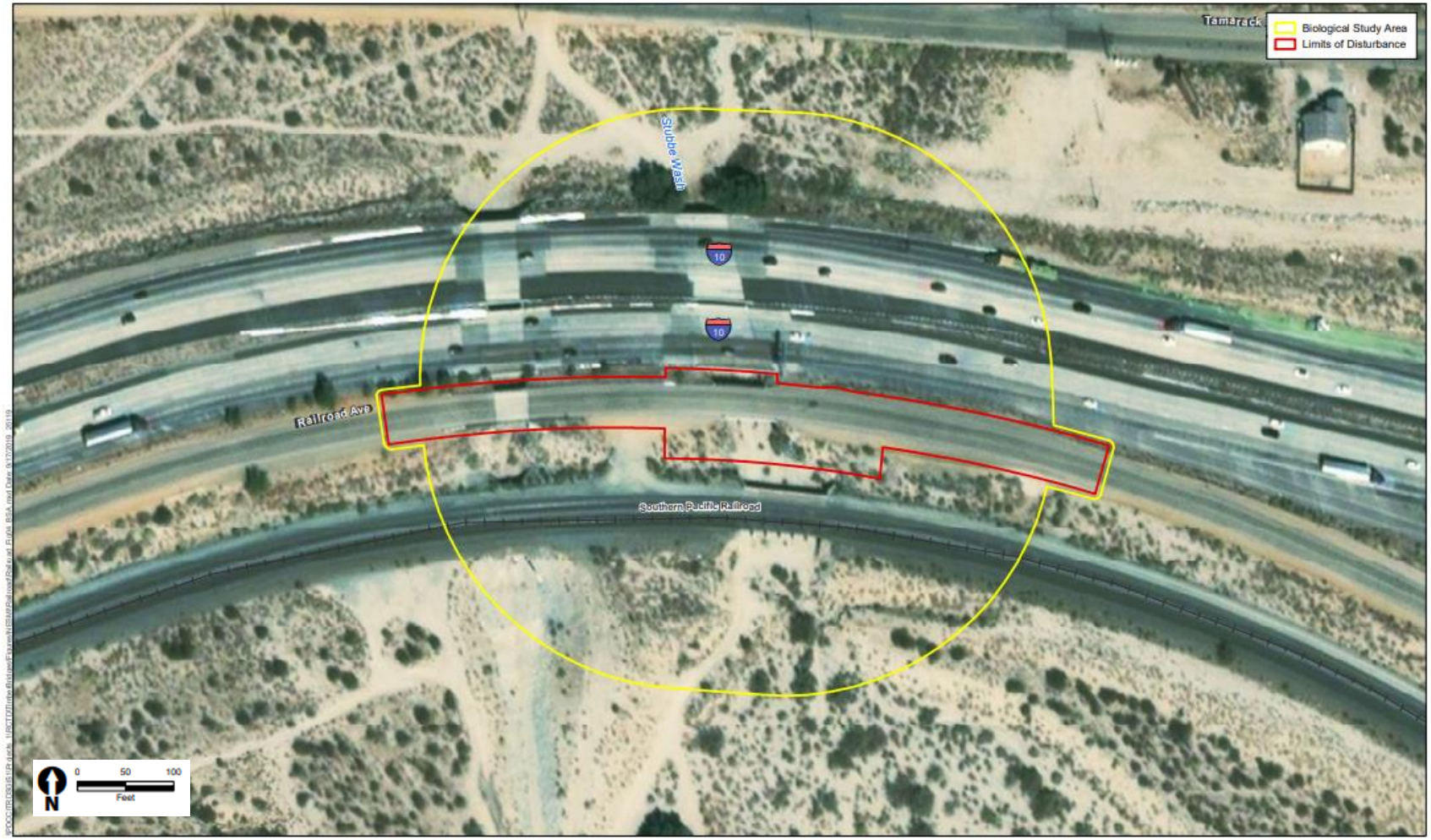


Figure 8. Biological Study Area at East Channel Stubbe Wash Bridge



Prior to conducting field surveys, relevant reference literature and natural resource databases were reviewed for potentially occurring plant and wildlife species and natural vegetation communities with special regulatory or management status and having a reasonable potential to occur within the BSAs. This evaluation included a review of the CDFW California Natural Diversity Database (CNDDB) Special Animals List; California Native Plant Society (CNPS) Electronic Inventory (CNPS 2019); USFWS IPaC decision support system, and USFWS National Wetlands Inventory (USFWS 2019). Once completed, field surveys were conducted at each BSA in 2017 and 2019.

Vegetation communities and land use types were mapped and identified for the two BSAs (see **Figure** and **Figure**). Six vegetation communities and two land use types were mapped within the East Channel Stubbe Wash Bridge BSA. These vegetation communities and land use types include: narrowleaf goldenbush – bladderpod scrub; disturbed creosote bush scrub, creosote bush – brittlebush scrub; brittlebush scrub; desert wash; ruderal; and developed/disturbed. These vegetation communities and land use types are described in more detail below and summarized in **Table 3**:

- The Narrowleaf Goldenbush – Bladderpod Scrub community is typically dominated by narrowleaf goldenbush, bladderpod and yellow mock aster in the shrub canopy. Other species observed include brittlebush, telegraph weed, and non-native grasses, including ripgut brome, Mediterranean grass and slender wild oat. This vegetation community is found within the Fornat Wash Bridge BSA and has been disturbed by maintenance of the Caltrans and County right of way (ROW) and off-road vehicles.
- The Disturbed Creosote Bush Scrub community is characteristically dominated by creosote bush but may also include other shrubs such as burroweed, cheesebush, shadscale, brickellbush, and brittlebush. The scattered foliage may also include a low cover of emergent trees such as honey mesquite and seasonal annuals or perennial grasses. This vegetation community sits within the Fornat Wash Bridge BSA and occurs south of the UPRR ROW. Consequently, the foliage has been heavily disturbed by ROW maintenance activities and off-road vehicle use. Due to the disturbances, this vegetation community is sparse.
- The Creosote Bush – Brittlebush Scrub community is a shrub community characteristically dominated by creosote bush and brittlebush. Other species that can often be found in this scrub community are desert agave, burroweed, and desert holly. This vegetation community is found within the East Channel Stubbe Wash Bridge BSA and occurs south of the UPRR ROW. Some areas of this community have been disturbed by off-road vehicle use.
- The Brittlebush Scrub community characterizes brittlebush as a dominant or co-dominant species in a shrub community. Other plants that can be found in this shrub community are desert agave, California sagebrush, and California buckwheat. The Brittlebush Scrub occurs between Railroad Avenue and the UPRR within the East Channel Stubbe Wash BSA. The plants found within this community include brittlebush, goldenbush, California croton, burroweed, jimsonweed, and non-native grasses, including ripgut brome and Mediterranean grass.

- The Desert Wash community occurs within both bridge BSAs. The wash bottoms are composed of coarse sandy soils and have no vegetation or are sparsely vegetated with species that occur in the scrub vegetation communities described above. Sporadic desert willows were also found within the Desert Wash community.
- The Ruderal vegetation community is often characterized as vegetation found on or adjacent to human-disturbed sites and is frequently disturbed. Ruderal vegetation communities were found in both BSAs. Ruderal vegetation consisted of tumble mustard, Athel tamarisk, and nonnative grasses.
- The Developed/Disturbed land use types were designated in both BSAs and account for the local dirt roads, existing paved roadways, and UPRR ROW that has been disturbed by maintenance activities. Most ROW areas were unvegetated, and the small amount of vegetation that was present was composed of nonnative species, such as tumble mustard and nonnative grasses.

Table 3. Summary of Vegetation Communities and Land Use Type within the BSAs

Vegetation Community	***Fornat Wash Bridge (acres)***	***East Channel Stubbe Wash Bridge (acres)***
Narrowleaf Goldenbush – Bladderpod Scrub	0.50	0.00
Disturbed Creosote Bush Scrub	0.13	0.00
Creosote Bush	0.00	0.14
Brittlebush Scrub	0.00	1.14
Desert Wash	0.37	0.56
Ruderal	0.57	0.58
Developed/Disturbed	4.76	3.73
Total within Study Area (acres)	**6.33**	**6.15**

Figure 9. Vegetation Communities/Land Use Types at Fornat Wash

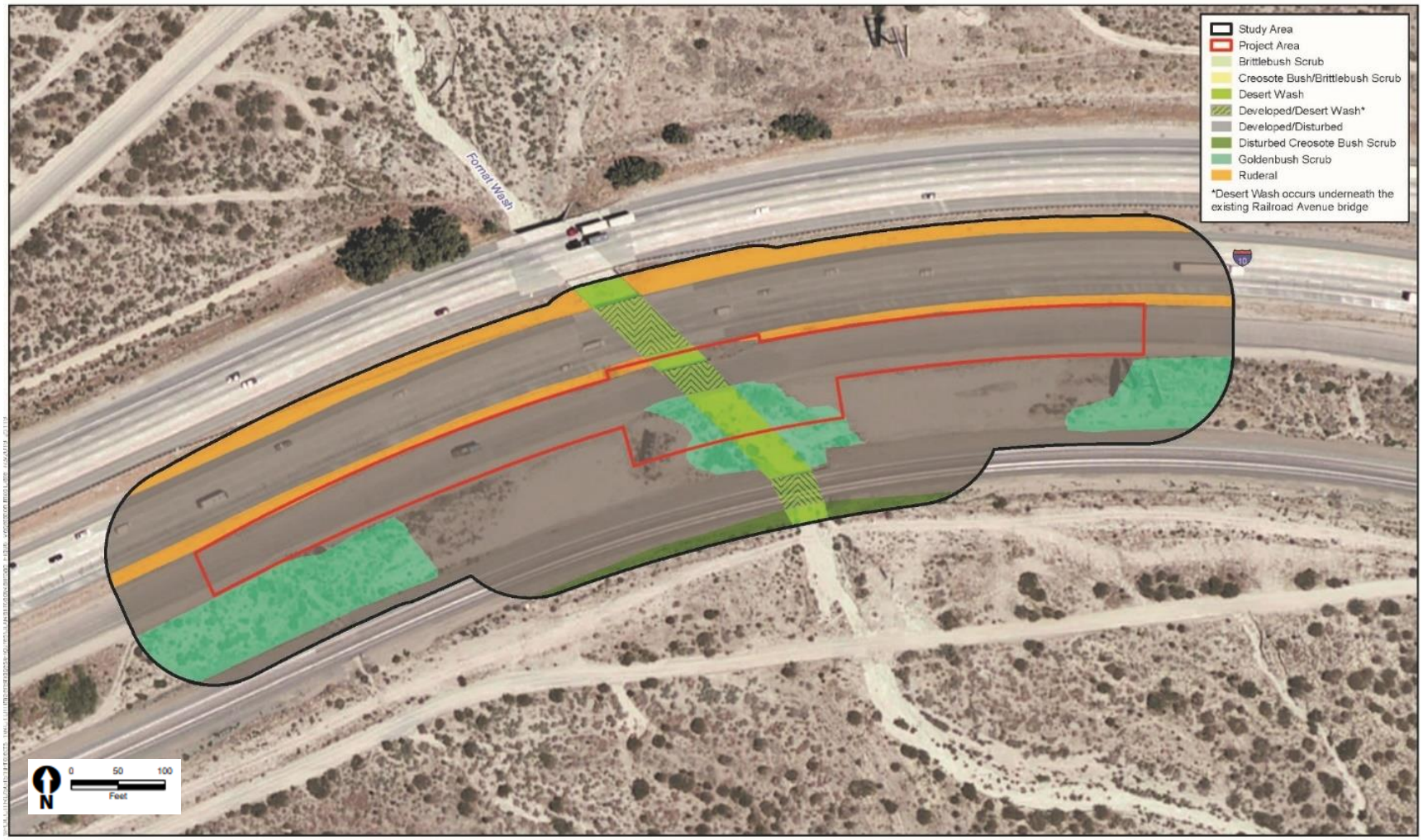


Figure 10. Vegetation Communities/Land Use Types at East Channel Stubbe Wash

Additional focused surveys were conducted for special-status plants, burrowing owls, desert tortoise, and bats. Below is a description of each survey, the methods used, and results.

Special-Status Plants

Review of relevant literature indicated 91 special-status plant species could occur within the BSAs. After further evaluation, suitable habitat was present for 19 species. A habitat assessment was conducted in May 2017, followed by a special-status plant focused survey with site visits in May, July, and October 2017 in suitable habitat of the BSA. The Guidelines for Conducting and Reporting Botanical Inventories (USFWS 2000) were followed. To ensure each target special-status species was detected during the blooming period, the survey was performed during different survey windows (spring, summer, and fall season) to increase detection of each species. The focused survey resulted in finding no special-status species.

Similar to the special status plant species review, of the 45 special status wildlife species, only one of the species was observed (loggerhead strike), and suitable habitat for an additional 17 wildlife species was identified. Suitable habitat is present for desert tortoise (*Gopherus agassizii*; federally and state-listed as threatened; CVMSHCP covered), Coachella Valley Jerusalem Cricket (*Stenopelmatus cahuilaensis*; no status; CVMSHCP covered), burrowing owl (*Athene cunicularia*; Species of Special Concern [SSC]; CVMSHCP covered), yellow warbler (*Setophaga petechia*; SSC; CVMSHCP covered), LeConte's thrasher (CVMSHCP covered; no status), San Diego desert woodrat (*Neotoma lepida intermedia*; SSC), flat-tailed horned lizard (*Phrynosoma mcallii*; SSC; CVMSHCP covered), Coachella Valley round-tailed ground squirrel (*Xerospermophilus tereticaudus chlorus*; SSC; CVMSHCP covered), Los Angeles pocket mouse (*Perognathus longimembris brevinasus*; SSC), Palm Springs pocket mouse (*Perognathus longimembris bangsi*; SSC; CVMSHCP covered), desert bighorn sheep (state-listed), pocketed free-tailed bat (SSC), Peninsular bighorn sheep DPS (*Ovis canadensis nelsoni pop. 2*; federally listed as endangered, state-listed as threatened, state fully protected; CVMSHCP covered), pocketed free-tailed bat (*Nyctinomops femorosaccus*; SSC), big free-tailed bat (*Nyctinomops macrotis*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), pallid bat (*Antrozous pallidus*; SSC), American badger (*Taxidea taxus*; SSC), and mountain lion (*Puma concolor*; evolutionary significant unit, state candidate for listing).

Special-Status Animals

Although suitable habitat is present for several special status animal species in the Project Area, the Project area lacks Core Habitat for covered species under the CVMSHCP (see Error! Reference source not found. and **Figure 12**). Core Habitat is not present due to frequent human disturbance associated with Caltrans, County, and UPRR ROW maintenance activities, and recreational use of the Pacific Crest Trail. For that reason, no additional analysis is required for the species covered under the CVMSHCP, which include LeConte's thrasher, yellow warbler, Coachella Valley round-tailed ground squirrel, flat-tailed horned lizard, Palm Springs pocket mouse, desert bighorn sheep, and Coachella Valley Jerusalem cricket.

Figure 11. CVMSHCP at Fornat Wash

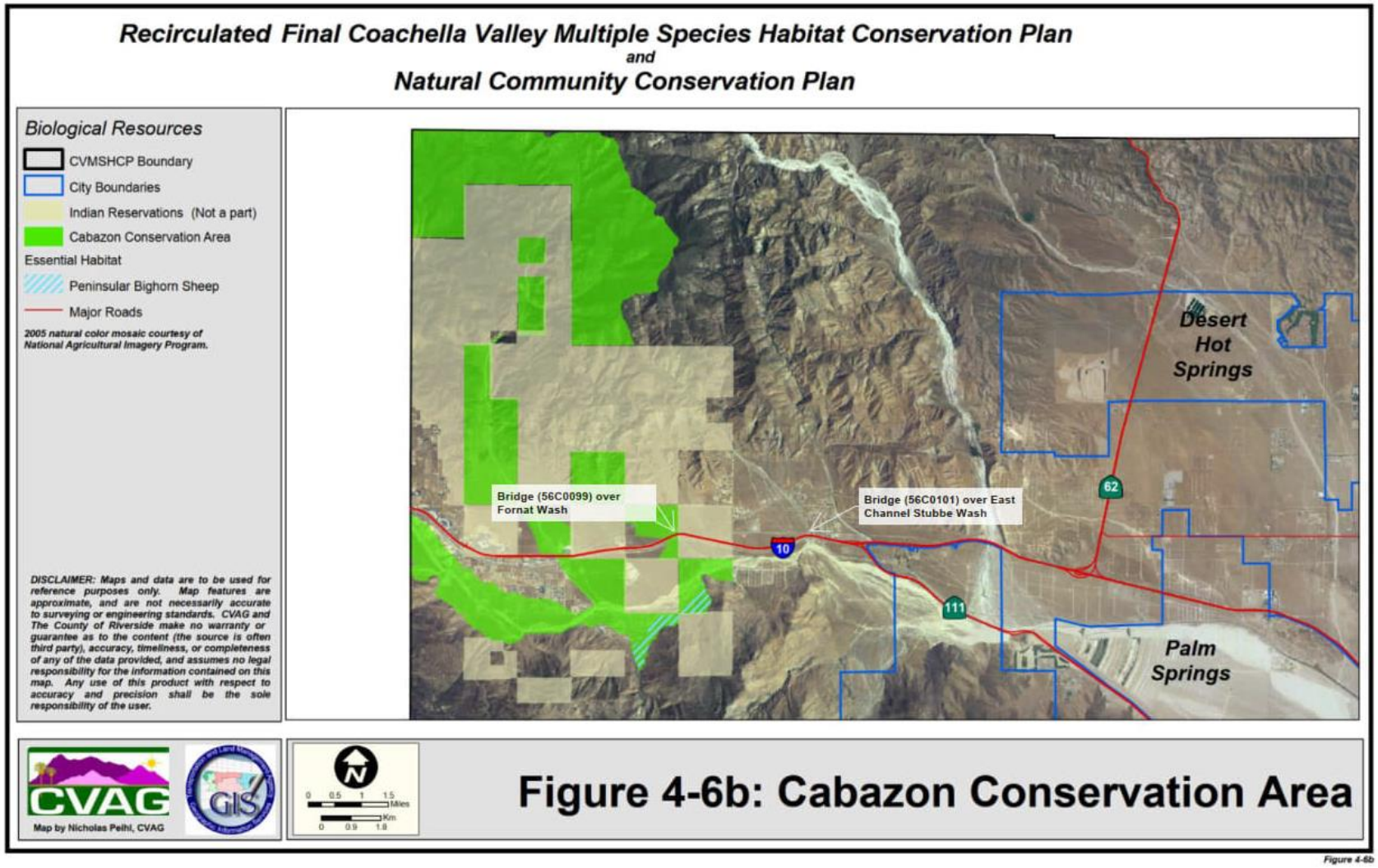
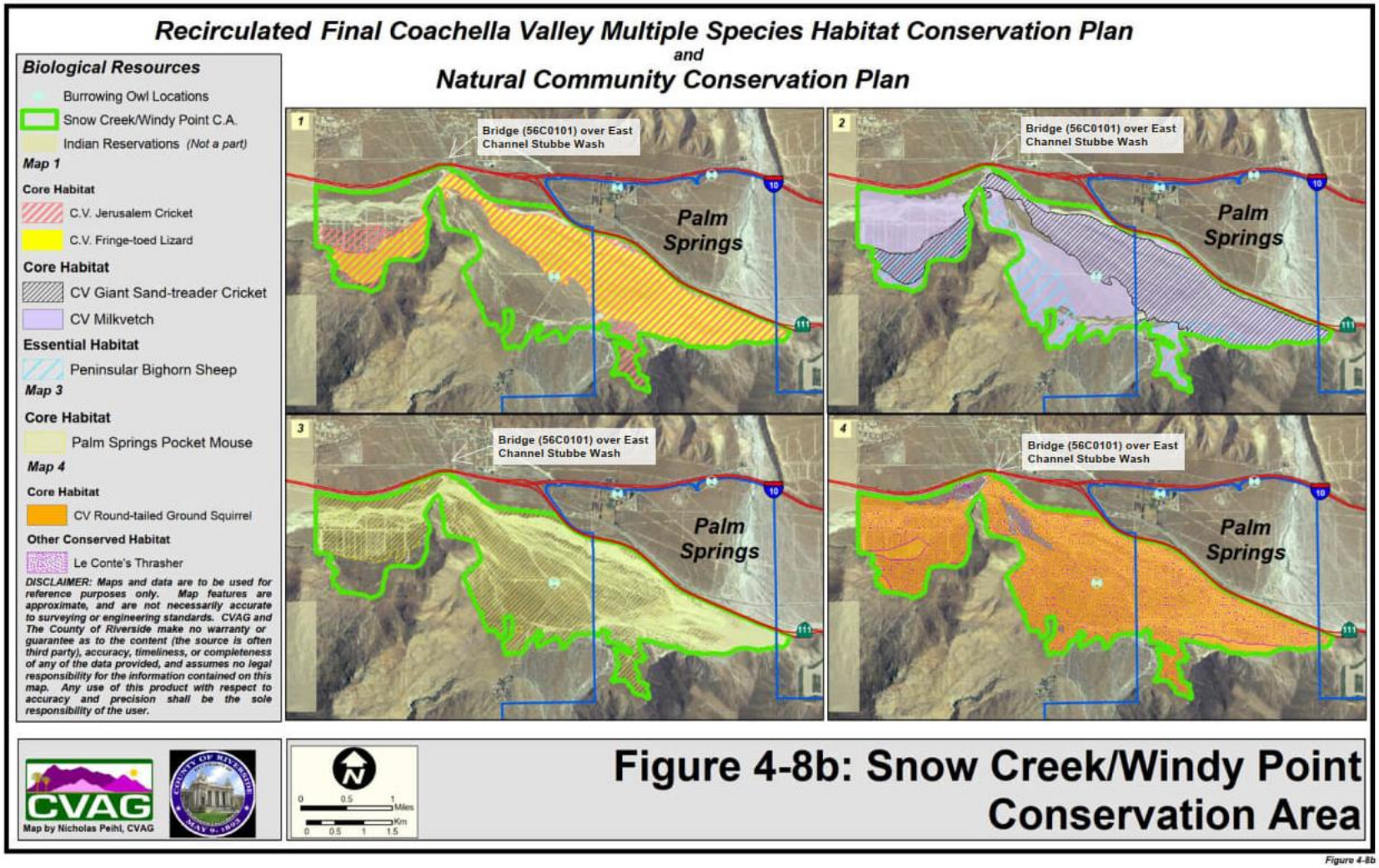


Figure 12. CVMSHCP at East Channel Stubbe Wash



Burrowing owls, bats, and desert tortoises are also considered a covered species under the CVMSHCP; however, additional analysis is required because there is suitable habitat and potential for species to occupy the Project site or adjacent areas in the future. These species are discussed in more detail below.

Desert Tortoise

The desert tortoise is a federally and state-listed threatened species found throughout the Mojave and Sonoran Desert regions within canyons, washes, rocky foothills, alluvial fans, and other open areas. The species is found within succulent scrub, creosote bush scrub and blue paloverde (*Parkinsonia florida*), ironwood (*Olneya* tesota); smoke tree (*Psorothamnus* spinosus) vegetation communities high in species richness (USFWS 2009). The desert tortoise inhabits burrows and is most active from March through June and from September through October. Protocol focused surveys for desert tortoise were performed in 2017 and 2019. In 2017, one hundred percent of the Project's limits of disturbance (LOD) was surveyed, and an additional Zone of Influence buffer was surveyed, where legally possible, at 200-, 400-, and 600-meter intervals. To ensure the focused surveys are current, the survey was repeated in 2019, and followed the 2018, USFWS Guidance. This survey consisted of evaluating the BSA at approximately 30-feet transects to allow for one hundred percent ground coverage.

No desert tortoise or definite tortoise signs were observed during the survey, and no USFWS critical habitat is present within the BSAs. Since the species was not found during the focused surveys, and no sign of their presence was observed, the species is considered absent.

Burrowing Owls

Protocol and focused surveys, as well as habitat assessments were conducted for burrowing owls. The Burrowing Owl Study Area consisted of a 500-foot buffer around the two subject bridges, with physical access occurring only within a 300-foot buffer and a visual assessment with binoculars occurring within an additional 200-foot buffer area due to access restrictions. Open lands that were sparsely vegetated were considered potentially suitable habitat including potentially suitable burrows that could be used by burrowing owls. The habitat evaluation concluded that suitable habitat for burrowing owls is present throughout all undeveloped areas of the initial 300-foot buffer of the Burrowing Owl Study Area.

Once the habitat evaluation was completed, a focused survey was initiated. The focused survey consisted of four separate site visits spaced at intervals during the protocol survey window from February 15 to July 15. Line transects spaced 30-feet apart were used to evaluate the habitat within the 300-foot buffer. Binoculars were then used to scan visible areas within the additional 200-foot buffer. The focused survey found four (4) suitable burrows near Fornat Wash bridge and seven (7) near East Channel Stubbe Wash bridge. Although suitable burrows were found, there were no burrowing owls or signs of burrowing owls (i.e., whitewash, tracks) found during the focused survey.

Bats

Based on the literature review and reconnaissance survey, pocketed free-tailed bat, big free-tailed bat, Townsend's big-eared bat, and pallid bat could potentially occur within the Project area. These bat species are CDFW SSC, not covered by the CVMSHCP, and are known to roost in crevices within trees, bridges, rocks, caves, culverts, and buildings.

In June 2017, a habitat evaluation was conducted at the two bridges, as well as the I-10 and UPRR bridges. The Project bridges are both timber bridge structures that contain crevices and gaps that are suitable for roosting bats. The adjacent bridges associated with the I-10 and UPRR bridges are both concrete with crevices and imperfections and provide suitable habitat for roosting bats at the bridge abutment joints. Therefore, the bridges were closely reviewed for potential structures and conditions suitable for bat roosts. No bat sign (i.e., guano, urine) were documented within the two bridges on Railroad Avenue or the adjacent I-10 and UPRR bridges.

In July 2017, a focused emergence survey for colonial bats was performed by visually observing bridges at dusk when bats would be emerging from their roosts and foraging. Bat echolocation calls were recorded using Anabat Bat Detection System and analyzed using Sonobat software to identify the bat species in the vicinity of the bridges. These species are common regionally and could potentially roost within bridges or in rock outcrops occurring in the regional vicinity. During the acoustic survey, the canyon bat was the only species documented. The Mexican free-tail bat may have also been recorded however, due to poor audio quality from freeway noise (I-10), the species was unconfirmed. No special-status bats were documented during surveys; therefore, they are not expected to occur.

Special Status Mammals

The BSA provides suitable habitat for the San Diego desert woodrat, Los Angeles pocket mouse, American badger, and mountain lion, all of which are not covered by the CVMSHCP.

The San Diego desert woodrat is associated with desert scrub, sage scrub, and chaparral vegetation communities. The species builds large stick nests in rock outcrops or shrubs. The nearest occurrence is approximately 0.4 mile to the southwest of East Channel Stubbe Wash Bridge, in the Whitewater USGS 7.5-minute topographical quadrant in 1995. Woodrat (*Neotoma* sp.) middens were documented in the BSA; however, it is unknown whether the nest belonged to the special-status subspecies.

The Los Angeles pocket mouse occurs within sandy drainage areas associated with chaparral, sage scrub, desert scrub, grassland, and vernal pools/playas. The BSAs occur just outside of the easternmost documented range of this species (CDFW 2018). However, this occurrence is from 1940. Habitat within the BSAs is deemed minimal because of potential vibration from the UPRR and degraded habitat within the County and UPRR ROW. The potential for this species to occur is low due to the degraded habitat within the BSAs of the bridges.

American badgers are fossorial, using burrows for dens, escape, and predation. Badgers feed on small vertebrates, especially rodents and are typically found in open grasslands and deserts. The nearest occurrence is approximately 7 miles to the west of Fornat Wash Bridge, in the Beaumont USGS 7.5-minute topographical quadrant in 1908. Another occurrence is 8 miles to the north of East Channel Stubbe Wash Bridge, in the Morongo Valley USGS 7.5-minute topographical quadrant in 1949. American badgers have very large home ranges of up to 2,000 acres and often dig a new den every day. Although this species is highly mobile, it is unlikely that a badger would dig a den within the BSAs due to existing disturbances such as existing off-road vehicle use and recreational use of the PCT. There is a potential for the species to move through the BSA in the washes.

Mountain lions are wide-ranging carnivores. The long-term persistence of some populations in California are in jeopardy. The threats facing mountain lions include habitat loss, increasing conflict with humans, demographic isolation, and genetic restriction. Vehicle collisions and depredation permits are often the greatest causes of mountain lion mortality, with other sources of mortality including disease, illegal shooting, arson-caused wildfire, public safety removal, and intraspecific aggression. In a study conducted in the Santa Ana Mountains and the eastern Peninsular Range (Vickers et al. 2015), all of the marked mountain lions killed due to depredation permits occurred in the eastern Peninsular Range and none in the Santa Ana Mountains while 60% of the mortalities due to vehicle collisions occurred in the Santa Ana Mountains. Where roads are less of a threat for mountain lions, depredation becomes more of a threat. Options for reducing road mortalities include protection of lands on both sides of road crossings, improving or adding large culverts, adding exclusionary fencing, and possibly constructing vegetated overhead passes for wildlife. To reduce mortality due to depredation permits, an education program to promote the use of predator-proof enclosures for domestic animals during crepuscular periods and at night would be beneficial (Vickers et al. 2015). There is potential for mountain lions to move through the BSAs in the washes. Human disturbance (general in nature and not related to the Project) within the washes will reduce the quality of the corridors for movement. Threats within the Project vicinity include not only the risk of mortality due to the road crossing, but also mortality due to depredation permits because of the land use within the vicinity of the Project (depredation permits are issued per Fish and Game Code 4802 but only as a last resort as per Fish and Game Code 4801.5). This risk is unrelated to the Project but is the greatest risk to mountain lions in the vicinity of the Project.

Wildlife Corridors

The corridors and linkages in the CVMSHCP are intended to retain the existing connectivity and there is no requirement in the CVMSHCP for improvements to existing linkages. However, there are requirements for maintaining functional Biological Corridors to maintain ecosystem function for covered species. In Section 4.3.1 Cabazon Conservation Area of the CVMSHCP, Conservation Objective #6 requires the maintenance of functional Biological Corridors under I-10 by conserving at least 631 acres in the Fornat Wash Biological Corridor, but there is no requirement for corridor improvements. Similarly, Section 4.3.2 Stubbe and Cottonwood Canyons Conservation Area of the CVMSHCP, Conservation Objective #8, requires the maintenance of functional Biological Corridors under I-10 by conserving at least 1,058 acres in the Stubbe Canyon Wash Biological Corridor; however, there is no requirement for corridor improvements. Lastly, Section 4.3.3 Snow Creek/Windy Point Conservation Area of the CVMSHCP, Conservation Objective #8, requires the maintenance of functional Biological Corridors and Linkages under I-10 and Highway 111, but there is no requirement for corridor improvements (CVAG 2007).

Regionally, the San Gorgonio River and tributaries associated within the river are valuable biological corridors connecting the San Bernardino Mountains and the San Jacinto Mountains. These biological corridors are also identified by the CVMSHCP within the Conservation Area. The Project area is ranked as having high biodiversity and has also been identified as a priority corridor. Two culverts under I-10, including East Channel Stubbe Wash, are noted in *Missing Linkages: Restoring Connectivity to the California Landscape* (California Wilderness Coalition 2001) as connecting the San Bernardino Mountains to the San Jacinto Mountains. These corridors are identified as connecting the Snow Creek/Windy Point Conservation Area and the

Stubbe and Cottonwood Canyons Conservation Areas in the CVMSHCP. The East Channel Stubbe Wash bridge is the narrow point of the biological corridor connecting the Cottonwood Canyons and Snow Creek/Windy Point Conservation Areas. However, within the CVMSHCP the functionality of this biological corridor has been identified as based on the one-mile width of the corridor, not the narrow freeway crossing.

The CVMSHCP identifies East Channel Stubbe Wash as an important biological corridor through the Stubbe and Cottonwood Canyons and Snow Creek/Windy Point Conservation Areas, providing a connection between the areas south and north of the I-10. In addition, the biological corridor provides an avenue of sand transport through East Channel Stubbe Wash to the Whitewater River floodplain.

Descriptions of the undercrossings are included in the CVMSHCP (see Appendix I, Section 4.4.1, *Stubbe Canyon Wash Biological Corridor under I-10*). The East Channel Stubbe Wash undercrossing is described as being 16.7 meters wide and 4.5 meters high and is 74.0 meters long. The line of sight is direct from one side to the other. The center median of the freeway is open, with natural light within the undercrossing. The bottom is natural, with rocks and sandy soils. To the north approximately 40 meters, the undercrossing slopes up to a two-lane frontage road. The corridor then expands into the San Bernardino Mountains further to the north, where it is over 1.5 miles wide at the mouth of Stubbe and Cottonwood Canyons. Approximately 20 meters to the south of the undercrossing is an elevated railroad track that provides no obstacle to wildlife movement, the San Jacinto Mountains are approximately 0.5 miles to the south.

Palm Springs pocket mouse populations were evaluated within wildlife corridors and were found to be corridor dwellers, maintaining sustainable populations in the corridors (Barrows et al., 2011). The bridge undercrossing could therefore provide live-in habitat or Palm Springs pocket mouse, a CVMSHCP Covered Species in the Snow Peak/Windy Point Conservation Area. The other Covered wildlife Species for this Conservation Area include Coachella Valley giant sand-treader cricket, Coachella Valley Jerusalem cricket, Coachella Valley fringe-toed lizard, and Coachella Valley round-tailed ground squirrel. In addition to providing live-in habitat for Palm Springs pocket mouse, the East Channel Stubbe Wash bridge undercrossing may provide live-in habitat for some of the smaller Covered Species with smaller home ranges, such as the Coachella Valley Jerusalem cricket. However, the high level of human disturbance associated with maintenance and recreational use of the PCT within this crossing reduces the habitat value for live-in habitat and this crossing may only function as move-through habitat for most, if not all these species.

CVMSHCP core habitat for Covered Species, such as Coachella Valley milkvetch, Coachella Valley Jerusalem cricket, Palm Springs round-tailed ground squirrel, and Palm Springs pocket mouse occurs within the biological corridor area. However, the CVMSHCP core habitat for these species within the BSA occurs south of the UPRR ROW. Due to the location and height of the UPRR, Railroad Avenue, and I-10 bridges, the East Channel Stubbe Wash is expected to be used by a variety of species, including bighorn sheep, mule deer, coyote, mountain lion, and desert tortoise, to cross under these transportation facilities.

The CVMSHCP identifies Fornat Wash as an important biological corridor serving the Cabazon Conservation Area. Fornat Wash is a tributary of the San Gorgonio River and provides a biological connection between the San Bernardino Mountains to the north and the San Jacinto Mountains to the south. The freeway culvert at Fornat Wash is identified as an unavoidably

narrow segment of the biological corridor; however, it is not identified as a Culvert or Bridge that Functions as a Biological Corridor (Appendix I, Section 4.4 of the Final Major Amendment of the CVMSHP). The freeway culvert is not a part of the fluvial sand transport Essential Ecological Process area. The biological corridor is one mile wide, except where existing uses and the Indian reservation lands (not subject to the CVMSHCP) preclude this width to minimize edge effects. Although most of the habitat for CVMSHCP covered species occurs within the floodplain of the San Gorgonio River, the CVMSHCP does not identify species core habitat within the undercrossing at Fornat Wash Bridge but does contain Essential Habitat for Peninsular bighorn sheep. A study within the region on wildlife movement found that structural attributes of individual underpasses had a minor influence on use by most species using highway underpass structures (Murphy-Mariscal et al., 2015), but that it was more important to provide a wide range of underpass structures to support a diversity of wildlife species and to modify underpasses to reduce human disturbance.

Jurisdictional Waters and Wetlands

In March 2019, a delineation of jurisdictional waters and wetlands was conducted to support the federal and state regulatory permitting processes for the Project. A total of seven features were mapped within the Project area. All features consist of ephemeral sandy channels, either small channels formed by runoff or large flood control channels designed to convey flows under the I-10, Railroad Avenue, and UPRR. In total, approximately 1.11 acres of USACE/RWQCB non-wetland Waters of the U.S. (WoUS), 1.35 acres of CDFW unvegetated streambed, and 0.003 acres of CDFW riparian vegetation were mapped within the bridge BSAs (see **Table 4**). No wetlands were identified within the bridge BSAs. **Figure** through **Figure** illustrate locations of jurisdictional waters within the bridge BSAs.

Table 4. Summary of Potential USACE, RWQCB, and CDFW Jurisdiction

Bridge	USACE/RWQCB Non-Wetland WoUS/WoS (acres)	CDFW Unvegetated Streambed (acres)	CDFW Riparian Vegetation (acres)
Fornat Wash Bridge	0.44	0.55	0.003
East Channel Stubbe Wash Bridge	0.67	0.80	0.0
Total	**1.11**	**1.35**	**0.003**

Figure 13. Locations of CDFW Jurisdictional Resources at Fornat Wash Bridge

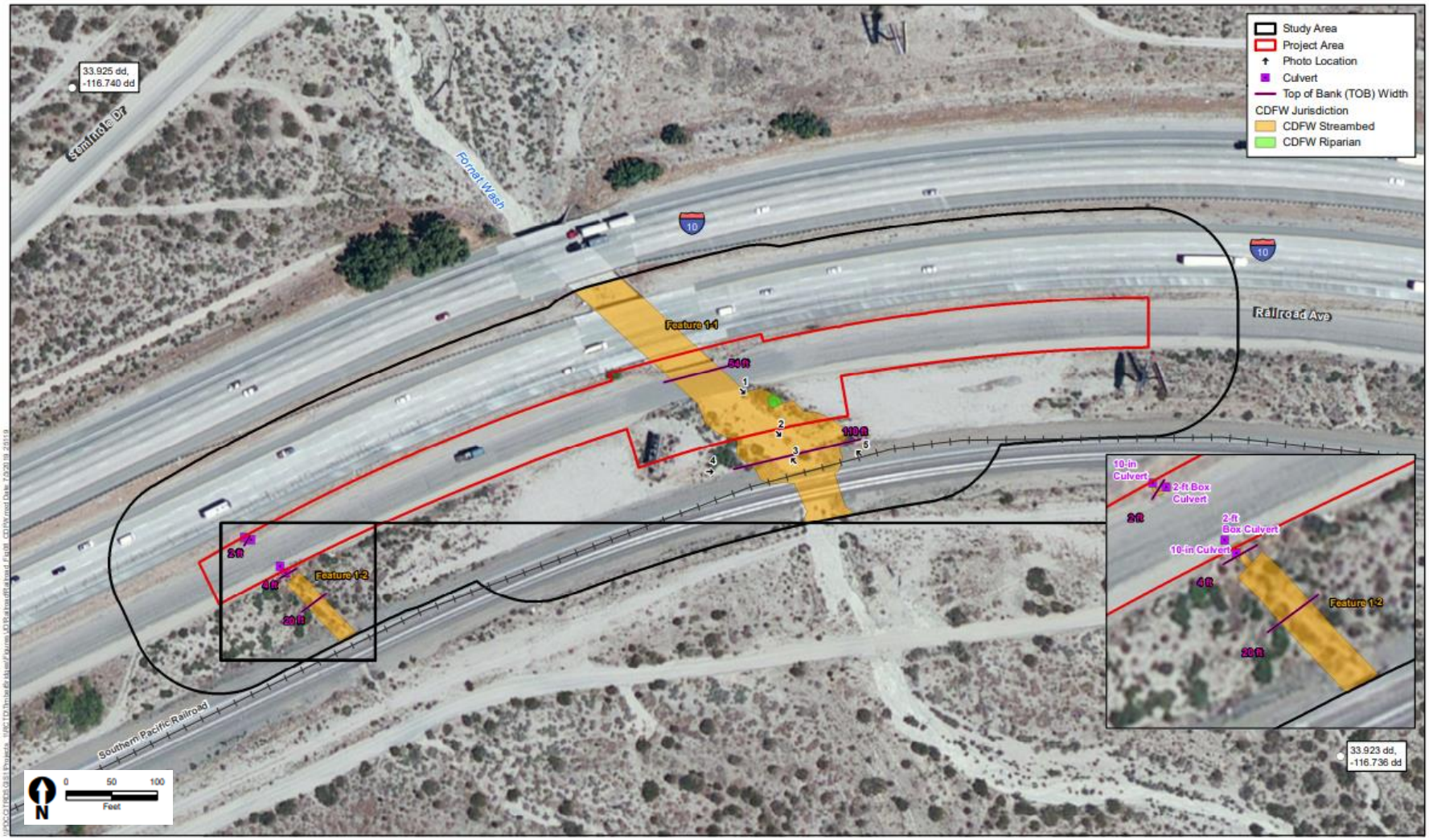


Figure 14. Locations of Non-Wetland Waters of the U.S. at Fornat Wash Bridge

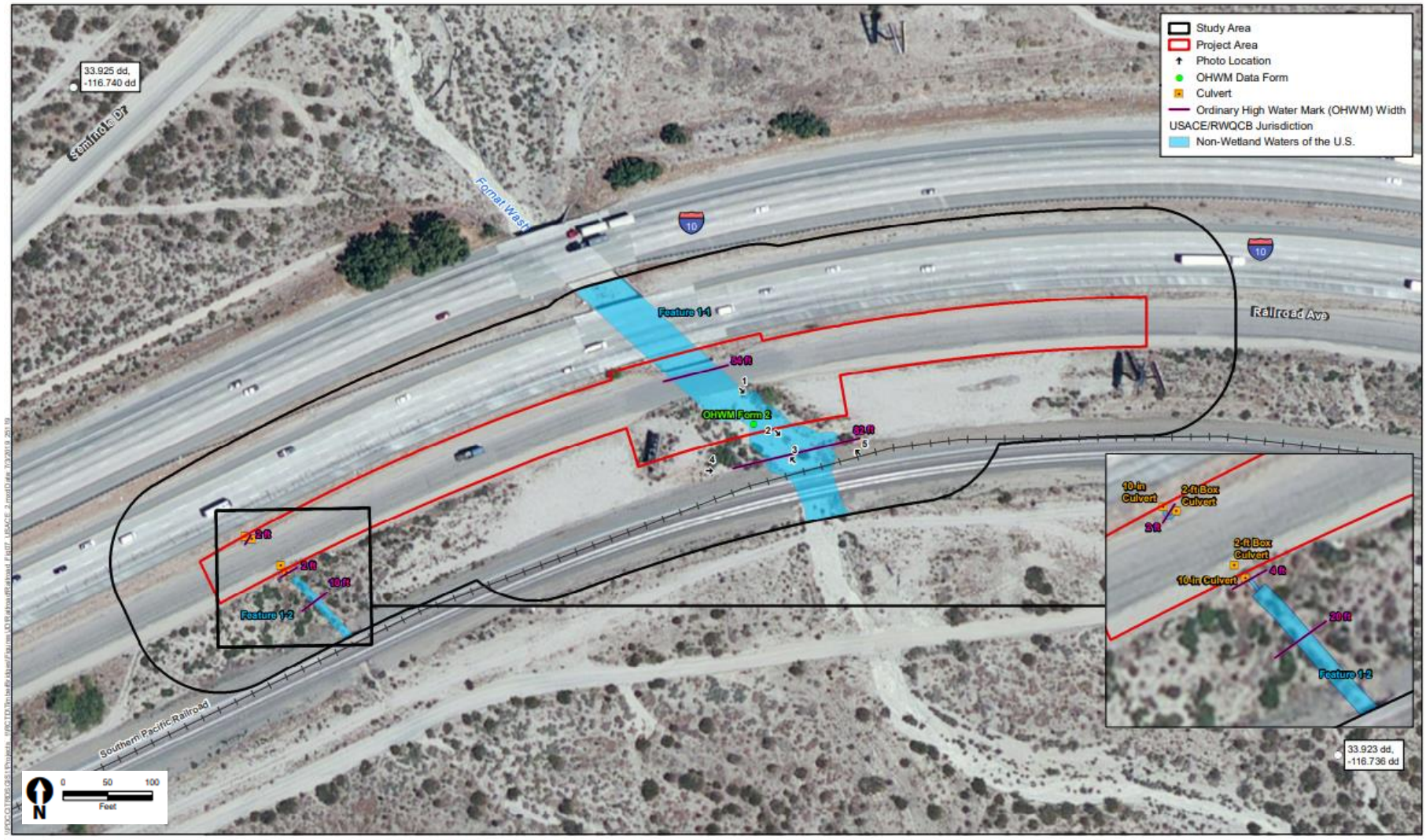


Figure 15. Locations of CDFW Jurisdictional Resources at East Channel Stubbe Wash Bridge

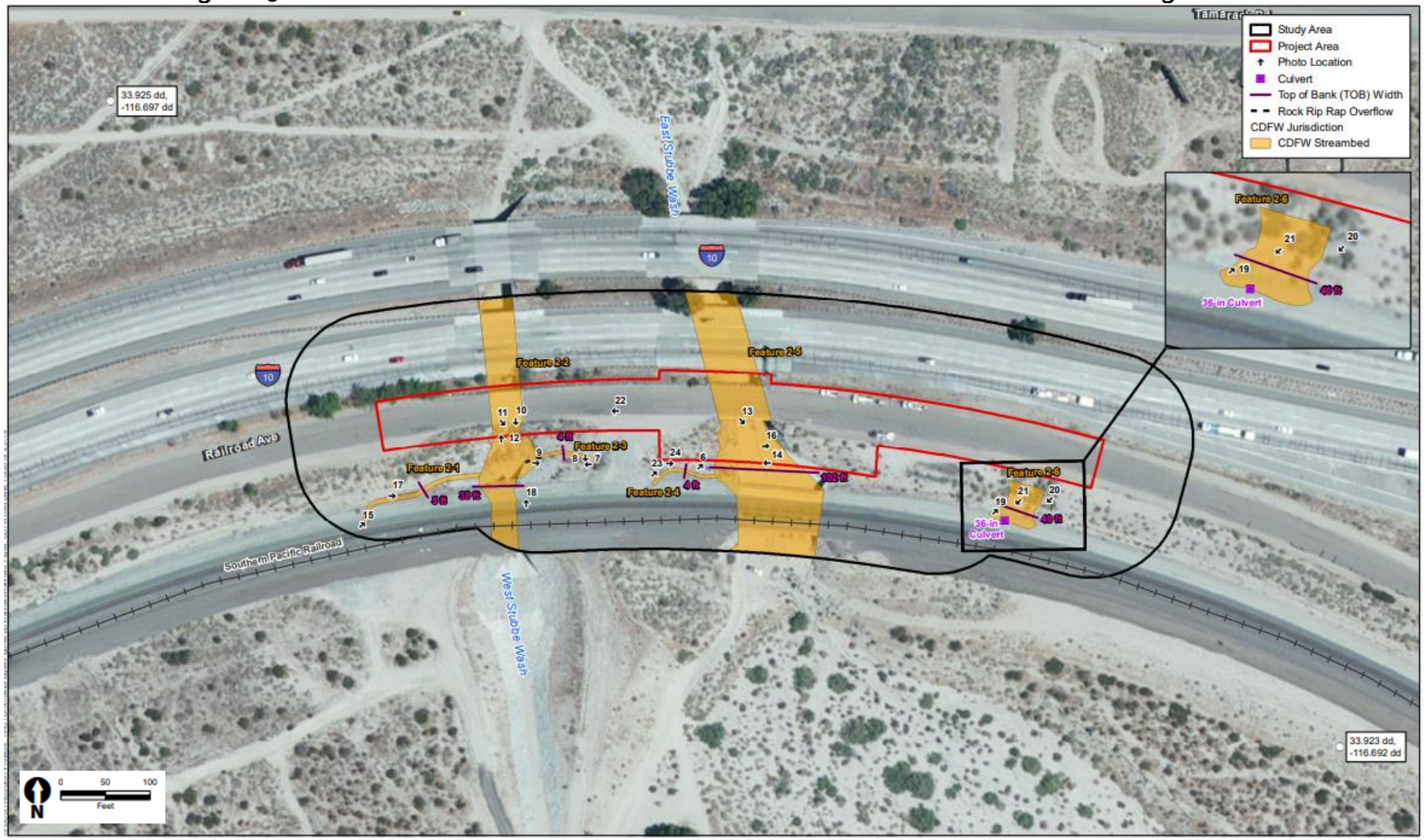


Figure 16. Locations of Non-Wetland Waters of the U.S. at East Channel Stubbe Wash Bridge

Impact Analysis:

a) Less than Significant Impact. Although construction activities would primarily be limited to the existing road ROW except for a temporary construction easement within the UPRR ROW, direct effects on vegetation communities would include removal of vegetation and manipulation of soils within the washes. Additionally, construction activities could potentially cause indirect effects through the spread of invasive plant species, increased risk of fire, increased trash, increased dust, and chemical spills. However, these potential indirect effects are not expected to appreciably affect sensitive vegetation communities. To ensure construction activities do not have indirect effects on downstream or adjacent resources, measure **BIO-1** would be implemented, and measure **BIO-2** would ensure the Project is consistent with the CVMSHCP.

Desert Tortoise

There would be no direct impact on desert tortoise due to the species absence from the Project area. No occupied or potential burrows would be affected by the proposed Project.

Although potential indirect impacts to desert tortoise are not expected, the Project occurs within the species range and there is the potential for the species to pass through the Project area. Therefore, avoidance and minimization measures would be implemented. Conducting presence/absence desert tortoise surveys before construction (**BIO-5**) and implementing a worker education program (**BIO-6**) would ensure construction activities avoid impacts on migrating individuals and would ensure the Project is consistent with the CVMHSCP. Additionally, the presence of a biological monitor (measure **BIO-3**) would ensure no impacts to the species would occur.

Caltrans determined the Project would have a "no effect" on desert tortoise or desert tortoise critical habitat due to the species absence from the Project area. Therefore, consultation with the USFWS was not required.

Burrowing Owls

Although no direct impacts are anticipated on burrowing owl due to the species' absence from the BSAs, there is a potential for the species to occur within the Project vicinity prior to and during construction. Because this species is highly mobile, there is potential for the species to migrate to the Project area. Potential indirect effects that may occur on burrowing owl include, an increased generation of dust, noise, or vibration that could collapse burrows, trash that can attract predators, and degradation of habitat adjacent to the Project area. Therefore, implementation of measure **BIO-7** would ensure full avoidance of potential impacts on burrowing owl should they occur within the Project area. Measure **BIO-2** would minimize the potential for indirect effects on burrowing owls. Avoidance measure **BIO-6** would include a worker education program to inform workers about the species and how to avoid impacts. Lastly, presence of a biological monitor (see measure **BIO-3**) would also ensure no impacts would occur if the species were found present.

Migratory Birds

The proposed Project could potentially affect nesting birds. Noise, dust, and vibration generated by construction activities could result in nest abandonment in natural habitats adjacent to the impacted areas. Although there is no suitable nesting habitat for loggerhead shrike (*Lanius*

ludovicianus; SSC) in the BSAs, this species was incidentally observed foraging within the BSAs during a field survey. Implementation of avoidance measure **BIO-9** would reduce potential effects on migratory birds and their nests.

Bats

Although special-status bats are not expected to occur in the Project area, Project construction may directly and indirectly affect common bats. Removing the bridges could potentially disrupt common bats that are using the bridges for day or night roosts. Project construction may also indirectly affect non-special-status bats foraging in the vicinity or roosting in nearby trees. Noise and vibration from construction equipment and human encroachment may result in bats temporarily leaving their roosts, or, if breeding, abandoning their maternity colony. Implementation of avoidance measure **BIO-8** would ensure construction-related effects on bats would be avoided.

Special- Status Mammals

The proposed Project would remove potential habitat for Palm Springs pocket mouse (a CVMSHCP Covered Species and not within the Core habitat for this species), San Diego desert woodrat, Los Angeles pocket mouse, American badger, and mountain lion. Construction activities could directly and/or indirectly affect the species' habitat, burrows, and foraging and breeding behaviors. However, based on the size of the impact area and existing disturbances and maintenance activities associated with Railroad Avenue, the UPRR, and I-10, it is not anticipated for the Project to affect a substantial number of these species. In addition, wildlife passage for American badger and mountain lion could be temporarily impeded during construction. However, wildlife that might normally use the undercrossing at Fornat Wash could potentially use an undercrossing approximately 500 feet to the west. In addition, West Channel Stubbe Wash is approximately 270 feet west of the East Channel Stubbe Wash, which could temporarily accommodate wildlife. The Project would increase the elevation of Fornat Wash bridge approximately two feet, increasing the openness of the channel. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no columns within the channel bed, which would increase the openness ratio of both bridge undercrossings.

In addition, the channel bottom would remain earthen and sandy for continued movement of species for both bridges. In May 2024, during consultation with the CVCC, they noted that the Project is considered an in-kind replacement as it is not increasing the bridge footprints since the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024 (see Appendix D), the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including American badger and mountain lion. Measure **BIO-2** would address any potential indirect effects on sensitive mammals that may occur within the vicinity of the Project area.

b) Less than Significant with Mitigation Incorporated. Construction activities would potentially affect jurisdictional waters both temporarily and permanently at each bridge location. Temporary effects would occur within the work area needed to construct the new bridges. During construction, soil compaction may occur within the jurisdictional waters, which may affect flow rates through the Project site and downstream. The potential indirect effects on

jurisdictional waters include introduction of invasive plant species, sedimentation, erosion, and chemical spills that may affect downstream resources. **Table 5** provides the summary of permanent and temporary impacts on jurisdictional resources at each bridge.

Table 5. Summary of Proposed Impacts on USACE/RWQCB and CDFW Jurisdictional Resources

Railroad Avenue Bridges	USACE/RWQCB Non-wetland (acres)		CDFW Unvegetated Streambed (acres)		CDFW Riparian (acres)	
	Perm. Impacts	Temp. Impacts	Perm. Impacts	Temp. Impacts	Perm. Impacts	Temp. Impacts
Fornat Wash Bridge	0.018	0.118	0.021	0.158	0.000	0.003
East Channel Stubbe Wash Bridge	0.029	0.137	0.030	0.160	0.000	0.000
Total	**0.047**	**0.255**	**0.051**	**0.318**	**0.000**	**0.003**

Under Section 401 and 404 of the CWA and Section 1602 of the California Fish and Game Code (CFGC), compensatory mitigation is required to replace the loss of wetland and aquatic resource functions in the watershed. Compensatory mitigation can take the form of permittee-responsible on- or off-site mitigation. Compensatory mitigation measure **BIO-4** would be implemented to achieve the goal of "no net loss" of jurisdictional resources. Final mitigation ratios will be determined during the permitting phase in consultation with the regulatory agencies; however, will be no less than a minimum of 1:1.

Temporary impacts to riparian habitat would be addressed through restoration to pre-construction conditions as identified in **BIO-1.** Additionally, minimization measure **BIO-2** would reduce the potential for water pollution and erosion-related impacts on waters.

c) No Impact.

RWQCB or USACE Jurisdictional Wetlands

Based on the Jurisdictional Delineation Report completed for the Project, no state (RWQCB) or federal (USACE) jurisdictional wetlands are present in the BSAs.

d) Less than Significant Impact.

Wildlife Corridors

During construction, there would be an increase in human presence including removal of the existing bridge and the use of construction equipment. Construction activities that generate noise and vibration would likely deter wildlife from using the area as a wildlife corridor. However, wildlife that might normally use the undercrossing at Fornat Wash could potentially use an undercrossing approximately 500 feet to the west. In addition, West Channel Stubbe Wash is approximately 270 feet west of the East Channel Stubbe Wash, which could temporarily accommodate wildlife. Due to the typical crepuscular (twilight hour) and nighttime usage patterns by desert species, the potential direct and indirect effects on biological corridors during construction are anticipated to be minimal, as construction activities would be limited or non-existent during these hours. Wildlife is not expected to cross over Railroad Avenue since it

directly abuts the eight-lane I-10 freeway, which deters animals from crossing due to its high traffic volumes.

The Project would increase the elevation of Fornat Wash bridge approximately two feet, increasing the openness of the channel. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no columns within the channel bed, which would increase the openness ratio of both bridge undercrossings. In addition, the channel bottom of both bridges would remain earthen and sandy for continued movement of species. In May 2024, during consultation with the CVCC, they noted that the Project is considered an in-kind replacement as it is not increasing the bridge footprints since the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024 (see Appendix D), the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife.

Biological corridors would be fully accessible for animal movement post construction. Implementation of avoidance and minimization measures would avoid impacts and reduce the likelihood of impacts on wildlife during construction activities. The measures include returning the sandy soils to original conditions (see measure **BIO-1**), implementing Best Management Practices (see measure **BIO-2**), and having a biological monitor onsite to ensure there are no incidental disturbances on biological resources (see measure **BIO-3**).

e) No Impact. The Project is consistent with the Riverside County Pass Area Plan (PAP) Measure 16.6 which ensures interconnected habitat conservation to provide a linkage from the San Jacinto Mountains to the Coachella Valley. In addition, the Project is compliant with the PAP Policy 16.10 and the Riverside County Western Coachella Valley Area Plan (WCVAP) Measure 22.1 which protects sensitive biological resources in the PAP through adherence to policies found in the CVMSHCP. Therefore, no impacts would occur, and no mitigation is required.

f) No Impact. The Project is located with the CVMSHCP-designated Cabazon Conservation Area for Fornat Wash Bridge and the Snow Creek/Windy Point Conservation Area for East Channel Stubbe Wash. The Project is a covered activity under the CVMSHCP (Volume I, Section 7.3.1.1) and is considered a project relating to "Operations and Maintenance, public access facilities." Operations and maintenance activities, including bridge repair and replacement, have already been accounted for during the CVMSHCP planning process and factored into the County's existing obligations. The Project is required to comply with applicable avoidance, minimization, and mitigation measures described in the CVMSHCP.

The CVMSHCP identifies conservation objectives including minimizing indirect effects from project development adjacent to or within the Conservation Area as they relate to drainage, toxics, lighting, noise, invasive species, and barriers (CVMSHCP Volume I, Sections 4.5.1 through 4.5.6). The conservation objectives and required measures for the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area which are applicable to the proposed Project are described in **Table 6** and **Table 7** respectively (see tables below).

The Project would implement avoidance and minimization measures **BIO-2**, and **BIO-5** through **BIO-7** to be consistent with the CVMSHCP Volume I Section 4.4 and 4.5. Additionally, the CVMSHCP identifies avoidance and minimization measures for desert tortoise and burrowing

owls. Since there is the potential for desert tortoise and burrowing owls to occupy the Project area, avoidance and minimization measures **BIO-3**, **BIO-5**, **BIO-6** and **BIO-7** would be incorporated to ensure full avoidance of potential impacts on the species and consistency with the CVMSHCP.

Table 6. CVMSHCP Consistency Analysis for Fornat Wash Bridge

Applicable Conservation Objectives	CVMSHCP Consistency Analysis
Conservation Objective 3: Conserve mesquite hummocks natural community and southern sycamore-alder riparian woodland natural community, which provide habitat for riparian birds and other Covered Species.	These natural communities are not present within the BSA.
Conservation Objective 4: Conserve Essential Habitat for the Peninsular bighorn sheep.	The Project does not occur within Essential Habitat for bighorn sheep.
Conservation Objective 5: Maintain the current capacity for fluvial (water-borne) sand transport along the San Gorgonio River and its tributaries.	The Project occurs outside of the Essential Ecological Process area for fluvial sand transport. However, once the bridge replacement is complete, Fornat Wash would be maintained with an earthen bottom, and have the same capacity for fluvial sand transport as existing conditions.
Conservation Objective 6: Maintain functional Biological Corridors under I-10 by conserving the Fornat Wash biological corridor to maintain ecosystem function for Covered Species. Aside from the freeway culvert, which is an unavoidably narrow segment, the biological corridor shall be one mile wide, except where existing uses or Indian reservation lands not subject to the Plan preclude this width, to minimize edge effects. It should also be noted that portions of the corridor cross Indian reservation land, which is not a part of the Plan and over which the Plan exerts no control.	All impacts to the biological corridor through Fornat Wash would be temporary during construction of the Project. Land use and maintenance of the Fornat Wash undercrossing would be the same as existing conditions during operation of the Project. An earthen bottom would be maintained. Reservation lands for the Morongo tribe occur within the staging area at the east end of the Project and are not covered by the proposed Project. The staging area would occur within the existing paved roadway, which is currently maintained by the County.
Required Measures for the Cabazon Conservation Area	**CVMSHCP Consistency Analysis**
Required Measure 2: The culvert conveying Fornat Wash under I-10 shall be maintained by Caltrans at no less than its current size, with a soft-bottom, to maintain current levels of sand transport and wildlife movement under I-10.	The project would not affect the portion of Fornat Wash under I-10. Additionally, the project has been designed to maintain a soft earthen bottom within Fornat Wash under Railroad Avenue.
Section 4.4 and 4.5 Required Measure 3: Ecological Process Area, the Permittees shall comply with applicable avoidance, minimization, and mitigation measures described in CVMSHCP Volume I, Section 4.4 and the Land Use Adjacency	**Ecological Process Area** – The Project occurs outside of the Essential Ecological Process area. **Measures BIO-2** and **BIO-5** through **BIO-7** would be implemented for compliance with CVMSHCP Volume I, Section 4.4 and 4.5).

Guidelines as described in CVMSHCP Volume I, Section 4.5. (Required Measure 3). Indirect effects from project development adjacent to or within the Conservation Area will address edge effects as they relate to **Drainage** (CVMSHCP Volume I, Section 4.5.1), **Toxics** (CVMSHCP Volume I, Section 4.5.2), **Lighting** (CVMSHCP Volume I, Section 4.5.3), **Noise** (CVMSHCP Volume I, Section 4.5.4), **Invasives** (CVMSHCP Volume I, Section 4.5.5), **Barriers** (CVMSHCP Volume I, Section 4.5.6), and **Grading/Land Development** (CVMSHCP Volume I, Section 4.5.7).	**Drainage** – The Project would address potential erosion of the bridge by including riprap along the bridge abutments and continuing subgrade at a 1.5:1 slope to a depth sufficient to prevent scour. Measure BIO-2 would ensure Best Management Practices are implemented to reduce potential degradation of biological resources and habitats within The Conservation Area. **Toxics** – Measure **BIO-2** would ensure no toxic chemicals or byproducts that are potentially toxic or could harm wildlife, plants, habitat or water quality would be discharged into the Conservation Area or waterways that drain into the Conservation Area (i.e., Stubbe Wash). **Lighting** – No lighting is being installed as part of the proposed Project. All construction activities would occur during daylight hours. **Noise** – The Project is confined to the north and south by I-10 and UPRR, which currently generate high noise levels. Pile driving may be necessary during construction activities however, the noise/vibrations generated as a result of construction are not expected to be appreciably greater than noise already generated by I-10 and UPRR. **Invasives** – Non-native plant species would not be incorporated into the landscape after construction is completed. All temporary disturbance areas would be hydroseeded with native plant mix meeting County/Caltrans standards (measure **BIO-1**). **Barriers** – Modern traffic barriers/railings would be installed along the bridges to meet Caltrans/County safety standards. These barriers would also discourage access into the Conservation Area from the ROW. **Grading/Land Development** – Manufactured slopes would not extend into adjacent lands in the Conservation Area; they would be limited to the County ROW.

Table 7. CVMSHCP Consistency Analysis for East Channel Stubbe Wash Bridge

Applicable Conservation Objectives	CVMSHCP Consistency Analysis
Conservation Objective 2: Conserve Core Habitat and associated Essential Ecological Processes (as set forth in Conservation Obj. 2a through 2g) for Coachella Valley milkvetch, Coachella Valley giant sand-treader cricket, Coachella Valley Jerusalem cricket, Coachella Valley fringe-toed lizard, Coachella Valley round-tailed ground squirrel, and Palm Springs pocket mouse, allowing evolutionary processes and natural population fluctuations to occur. Minimize fragmentation, human-caused disturbance, and edge effects to Core Habitat by conserving contiguous Habitat and effective Linkages between patches of Core Habitat.	The Project occurs at the northern edge of Core Habitat for several of the species listed in Conservation Obj. 2a through 2g, however the project site lacks suitable habitat for these species due to existing maintenance of Caltrans, County, and UPRR ROWs, and recreational land uses within the undercrossing at East Channel Stubbe Wash. During construction there would be a temporary increase in human disturbance. However, once Project construction is completed, maintenance activities and land uses would remain the same as existing conditions.
Conservation Objective 3: Conserve Le Conte's thrasher nesting sites as described in CVMSHCP Volume I, Section 4.4 for avoidance, minimization, and mitigation measures.	There are no potential nesting sites for Le Conte's thrasher.
Conservation Objective 5: Conserve individual desert tortoises as described in CVMSHCP Volume I, Section 4.4 for desert tortoise avoidance, minimization, and mitigation measures.	Desert tortoise would not be impacted by the project as it is not present in the BSA. However, since there is potential for desert tortoise to use the biological corridor through East Channel Stubbe Wash, Measures **BIO-3**, **BIO-5**, and **BIO-6** have been incorporated from CVMSHCP Volume I, Section 4.4 to ensure there are no direct effects to migrating desert tortoise.
Conservation Objective 6: Conserve occupied burrowing owl burrows as described in CVMSHCP Volume I, Section 4.4 for burrowing owl avoidance, minimization, and mitigation measures.	Burrowing owl would not be directly affected by the Project, however, there is a potential for burrowing owl to occupy the project site or adjacent areas in the future. Measure **BIO-7** has been incorporated from CVMSHCP Volume I, Section 4.4 to ensure full avoidance of potential impacts on burrowing owl.
Conservation Objective 8a: Conserve the Stubbe Canyon Wash Biological Corridor south of the I-10 to maintain potential habitat connectivity for desert tortoise, Coachella Valley round-tailed ground squirrel, and Palm Springs pocket mouse, and to maintain ecosystem function for Covered Species.	All impacts to the Biological Corridor would be temporary during construction of the Project. Land use and maintenance of East Channel Stubbe Wash undercrossing would be the same as existing conditions during operation of the Project. An earthen sandy bottom would be maintained.

Aside from the freeway culverts and any Existing Use areas, which are unavoidably narrow segments, the Biological Corridor shall expand to one mile wide to minimized edge effects.	
Required Measures for the Snow Creek/Windy Point Conservation Area	**CVMSHCP Consistency Analysis**
Section 4.4 and 4.5 Required Measure 2: The Permittees shall comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5. (Required Measure 2). Indirect effects from project development adjacent to or within the Conservation Area will address edge effects as they relate to **Drainage** (CVMSHCP Volume I, Section 4.5.1), **Toxics** (CVMSHCP Volume I, Section 4.5.2), **Lighting** (CVMSHCP Volume I, Section 4.5.3), **Noise** (CVMSHCP Volume I, Section 4.5.4), and **Invasives** (CVMSHCP Volume I, Section 4.5.5), **Barriers** (CVMSHCP Volume I, Section 4.5.6), and **Grading/Land Development** (CVMSHCP Volume I, Section 4.5.7).	Measures **BIO-2** and **BIO-5** through **BIO-7** have been incorporated to address VMSHCP Volume I, Section 4.4 and Section 4.5. **Drainage** – The project is being designed to address potential erosion of the bridge, including installation of riprap downstream of the bridge. Measures **BIO-2** would ensure Best Management Practices are implemented and would reduce potential degradation of biological resources and habitats within The Conservation Area. **Toxics** – measure **BIO-2** would ensure no toxic chemicals or byproducts that are potentially toxic or could harm wildlife, plants, habitat or water quality would be discharged into the Conservation Area or waterways that drain into the Conservation Area (i.e. Stubbe Wash). **Lighting** – No lighting is being installed as part of the proposed project. All construction activities will occur during daylight hours. **Noise** – The project is bordered on the north and south sides by two facilities that already generate high decibel of noise levels on either side of the LOD: the I-10 and the UPRR. Pile driving may be necessary during construction activities, however, the noise/vibrations generated as a result of construction are not expected to be appreciably greater than noise already generated by the I-10 and UPRR. **Invasives**- Non-native plant species will not be incorporated into the landscape after construction is completed. All temporary disturbance areas will be hydroseeded with native plant mix meeting County/Caltrans standards. **Barriers** – Modern traffic barriers/railings will be installed on each side of both bridges to meet Caltrans/County safety standards.

	These barriers would also discourage access into the Conservation Area from the ROW. However, public access through the East Channel Stubbe Wash will not be restricted as this serves as a recreational trail. **Grading/Land Development** – Manufactured slopes will not extend into adjacent lands in the Conservation Area; they will be limited to the County ROW.

Avoidance, Minimization, and/or Mitigation Measures:

The Project would implement the following avoidance, minimization, and compensatory mitigation measures to reduce potential impacts on habitat and species, and to achieve no net loss of jurisdictional waters.

Avoidance measures:

BIO-5: Desert Tortoise Clearance Survey. Immediately prior to the start of Project activities and after any pause in Project activities, a qualified biologist shall conduct clearance surveys for desert tortoise as described in Chapter 6 of the USFWS 2009 Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii*); https://www.fws.gov/sites/default/files/documents/Desert-Tortoise-Field-Manual.pdf

Clearance surveys require 100 percent coverage of the Project area, with a focus on locating all desert tortoises above and below ground within the Project area immediately prior to surface disturbance or following construction of a desert tortoise-proof fence or similar barrier encompassing the Project area to ensure that tortoises cannot enter the Project area. To locate desert tortoises below ground, if the end of the burrow is not visible, the burrow (and all side channels) will be examined by a qualified biologist using a fiber optic scope to search for desert tortoises.

- Clearance surveys must consist of at least 2 consecutive passes of the site and involve walking transects equal to or less than 15-feet (5-meters) wide under typical conditions. Clearance surveys should be conducted when desert tortoises are most active (April through May or September through October). If desert tortoises are found during the second pass, a third pass may be required by the USFWS or CDFW.
- If desert tortoise exclusion fence is installed, the fencing should be checked several times a day to ensure that a tortoise has not been trapped within the fence.
- Any person that handles desert tortoises during clearance surveys must have appropriate authorizations from USFWS and CDFW.
- If desert tortoise are observed during the survey, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures.
- The area cleared and the number of desert tortoises found within that area must be reported to the local USFWS and CDFW prior to the start of construction.

- Desert tortoise clearance surveys cannot be combined with surveys for any other species.

BIO-6: Worker Environmental Awareness Program Training. A Worker Environmental Awareness Program (WEAP) will be developed and presented to all construction personnel prior to the start of construction activities. The WEAP training will be presented by a qualified biologist. The biologist will describe the work limits in which the Project must be accomplished. The training will include general behavior and ecology for species of concern (i.e., desert tortoise and migratory birds), identification of the species, reporting requirements, and protection measures being implemented for the Project, which may include but not be limited to:

- Project personnel will not be allowed to bring pets into the Project construction site.
- No hazards to the desert tortoise (e.g., auger holes, trenches, pits, or other steep-sided depressions) will be left unfenced or uncovered; such hazards will be eliminated prior to the construction crew and the biologist(s) leaving the Project construction site for the day.
- During construction-related activities for the Project, motor vehicles will be limited to approved designated roadways and areas identified as permanently or temporarily affected by construction of the Project. All motor vehicles driving on approved nonpaved roads in the Project area will not exceed 20 miles per hour.
- Anyone who operates a motor vehicle or construction equipment will check under the parked vehicles/equipment for the presence of desert tortoises before vehicle/equipment is moved.
- Should any desert tortoise be injured or killed, all activities will be halted within 500 feet of the incident, and the Field Contact Representative (FCR) and/or Approved Biologist immediately contacted. The FCR and/or Approved Biologist will be responsible for reporting the incident to the USFWS and CDFW.

BIO-7: Burrowing Owl Avoidance. A preconstruction burrowing owl survey will be performed within 500 feet of the Project's limits of disturbance and any staging areas at least 14 days prior to the initiation of ground disturbance activities and within 24 hours prior to ground disturbance in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version). The survey will be performed by a biologist experienced performing surveys for burrowing owl and species identification. All burrows within the survey area will be examined to determine occupancy by burrowing owl. If the burrow is occupied, the qualified biologist shall coordinate with CDFW and USFWS to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be approved by CDFW and USFWS prior to commencing Project activities within the recommended restricted setback distances as specified in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version) of the occupied burrow.

If burrowing owls were to occur and impacts on occupied burrowing owl habitat or burrows cannot be avoided, a Burrowing Owl Plan will be prepared. The Plan will

describe the minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure will only be considered as a last resort. The Project proponent will implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

BIO-8: Preconstruction Bat Survey and Exclusion. To avoid direct mortality on bats, and their daytime or maternity roosts, a qualified bat biologist will be retained to conduct bat and bat roosting site surveys prior to construction. This preconstruction survey will be conducted within 200 feet of Fornat Wash Bridge and East Channel Stubbe Wash Bridge during the general bat maternity season (between April 1 and September 30). The survey will occur at dusk and will include both acoustic data collection and an emergence count. If roosting sites or bats are not found, no further action will be necessary. Otherwise, the following exclusion is applicable:

Part A. If the preconstruction survey finds bats to be roosting and bridge removal is scheduled to occur between October 1 and March 31 (outside of the maternity season of April 1 through September 30), bats will be evicted by the methods discussed below. In addition, if bat roosts are found in the bridge and the Project may perform work underneath or within 200-feet of the bridge with bats (between April 1 and September 30), the discussion below would also apply.

The eviction of bats will be conducted using bat exclusion techniques developed by Bat Conservation International in consultation with CDFW and under the supervision of a qualified bat biologist. These techniques allow the bats to exit the roosting site but prevent re-entry. This process will include, but not be limited to, the installation of one-way exclusion devices at the bridge(s). Sealing the bridge(s) at the time of abandonment, where applicable, may prevent the need for the exclusion process. Where exclusionary devices are installed on the bridge, the devices will remain in place for seven days, at which time the exclusion points and any other potential entrances will be sealed. A visual inspection of the bridge by a qualified bat biologist will be required prior to bridge removal to verify that all bats have been successfully excluded.

Part B. If the preconstruction survey finds bats to be roosting and bridge removal is scheduled to occur during the maternity season (April 1 through September 30), a qualified bat biologist will monitor the roost to determine if the roost site is a maternal roost. This may be determined by either visual inspection of the roost for bat pups, if possible, or monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats will be evicted as described above under Part A. If the roost is determined to be a maternal roost, eviction of the maternal roost cannot occur during the nursery season, because bat pups cannot leave the roost until they have reached maturity. Once the maternity season is completed, construction and bridge removal can commence.

BIO-9: Preconstruction Survey for Nesting Birds. If construction activities are initiated during the bird breeding season (generally defined as February 15 through September 15), a preconstruction survey by a qualified biologist will occur no more than three days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will use methods to avoid potential nest predation

due to survey and monitoring efforts. The survey will occur within all suitable nesting habitats within the Project's limits of disturbance and a 100-foot buffer, as access is allowed. If active nests are found during the pre-construction nesting bird survey, an appropriate buffer (at least 300 feet for passerines and 500 feet for raptors) will be established on the ground around the nest by the qualified biologist until it has been determined that young have fledged, or nesting activities have ceased. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Any active nest will be monitored daily for behavioral modifications induced by construction noise or other activity. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.

Minimization measures:

BIO-1: Temporary Construction Areas. Post-construction, all temporary construction areas and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix. Ephemeral washes and their banks will be left with an earthen, sandy bottom. No riprap or other obstructive material will be placed under the new bridges.

BIO-2: Best Management Practices. The following BMPs will be implemented to reduce impacts on biological and aquatic resources.

- Dust control measures will be implemented to minimize impacts on adjacent vegetation.
- Activities that may produce sparks, including welding or grinding, will use protective gear to reduce fire risks, such as the use of shields and protective mats. Fire suppression capabilities, including extinguishers, shovels, and water tankers, will be available onsite whenever construction occurs during the fire season (as determined by the Riverside County Fire Department).
- Trash will be stored in closed containers so that it is not readily accessible to wildlife and will be removed from the construction site daily to avoid attracting wildlife to the Project area.
- Project construction will be limited to daylight hours as feasible and will minimize the use of lighting to only what is required for directional and safety purposes.
- Exotic plant species removed during construction will be properly handled to prevent sprouting or regrowth. No plant species listed in CVMSHCP Volume I, Section 4.5.5 will be used.
- Work vehicles shall be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site.
- Trucks carrying vegetation that will be removed from the Project area will be covered and disposed of in accordance with applicable laws and regulations.
- Plans for water pollution and erosion control will be developed and implemented in accordance with RWQCB requirements. The plans will describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and use of plant material for erosion control. Plans will be reviewed and approved by Caltrans prior to construction. The water pollution and erosion control plan will include the following at a minimum:

- Ensure no fluids or sediment from construction will enter ephemeral washes.
- Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized.
- No erodible materials will be deposited into watercourses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks.
- Equipment maintenance, staging, storage, and dispensing of fuel, oil, coolant, or any other toxic substances will be located on non-sensitive upland sites with minimal risks of direct drainage into watercourses. These designated areas will be clearly marked and located in such a manner as to contain runoff from entering sensitive habitat, including watercourses and ephemeral washes.
- Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate entities, including, but not limited to, the applicable jurisdictional County, USFWS, CDFW, or RWQCB, and will be cleaned up immediately and contaminates removed to approved disposal areas.

BIO-3: Biological Monitor. An Approved Biologist will monitor all construction activities during initial ground disturbance. The Approved Biologist will ensure that all practicable measures are being employed to avoid incidental disturbance of the CVMSHCP Conservation Area adjacent to the BSAs. Once initial ground clearing is completed, ongoing weekly monitoring and reporting will occur throughout the duration of construction activities to ensure BMPs in **BIO-2** are implemented.

Mitigation measure:

BIO-4: Compensatory Mitigation for Replacement/Restoration of Jurisdictional Waters.

Permanent and temporary impacts from the replacement of Fornat Wash Bridge (#56C0099) and East Channel Stubbe Wash Bridge (#56C0101) will require compensatory mitigation for jurisdictional waters. Compensation can be a combination of enhancement, restoration, and/or rehabilitation. Compensation can occur through the option of permittee-responsible on- or off-site mitigation and will be determined in consultation with the USACE, RWQCB, and CDFW during the permitting phase. Temporary impacts will be restored with implementation of **BIO-1**. However, to ensure adequate compensatory mitigation is obtained, final mitigation ratios will be determined in consultation with the USACE, RWQCB, and CDFW and would be at a minimum 1:1 ratio. Applications for permits (404, 401, 1602) will be submitted following adoption of the Final IS/MND.

3.5 Cultural Resources

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Source(s): Information in this section is based on a cultural resources literature and records search, a review of the California Native American Heritage Commission's (NAHC) Sacred Lands File, Native American consultation, and a field survey. Additionally, the information is sourced from the Historic Property Survey Report (HPSR), Historical Resources Evaluation Report, Archaeological Survey Report (ASR), and Department of Parks and Recreation (DPR) Forms (February 2022) and Finding of Effect (June 2022) prepared for the Project.

Regulatory Setting:

National Historic Preservation Act (NHPA)

The National Historic Preservation Act (NHPA) of 1966, sets forth national policy and eligibility procedures for defining significant historic properties-- districts, sites, buildings, and structures. Significance eligibility is determined based on the integrity of the resource and its association to American history, architecture, and culture.

Integrity is the ability of a property to convey its significance. To be listed in the National Register, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but is must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Within the concept of integrity, the National Register criteria recognize seven aspects or qualities that, in various combinations, define integrity. These are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant.

Section 106 of the NHPA requires federal agencies to consider the effects of their undertakings on historic properties and to allow the Advisory Council on Historic Preservation the opportunity to comment on those undertakings.

California Register of Historical Resources (CRHR)

The CEQA requires the consideration of cultural resources that are historical resources and tribal cultural resources, as well as "unique" archaeological resources. California Public Resources Code (PRC) Section 5024.1 established the California Register of Historical Resources (CRHR) and outlined the necessary criteria for a cultural resource to be considered eligible for listing in the CRHR. Historical resources are defined in PRC Section 5020.1(j). The criteria and integrity evaluation are similar to that of the National Register of Historic Places (NRHP). An eligible resource is identified as a property greater than 50 years old and that meets one or more of the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States (Criterion 1).
- Associated with the lives of persons important to local, California or national history (Criterion 2).
- Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic value (Criterion 3).
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation (Criterion 4).

Under CRHR, integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the California Register must meet one of the criteria of significance described above and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

CEQA Guidelines Section 15064.5

Section 15064.5 of the CEQA Guidelines requires the state lead agency to evaluate the project's impact on historic resources listed in or determined to be eligible for listing in the CRHR. A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

The lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

When a project will affect state-owned historical resources, as described in Public Resources Code Section 5024, and the lead agency is a state agency, the lead agency shall consult with the State Historic Preservation Officer as provided in Public Resources Code Section 5024.5. Consultation should be coordinated in a timely fashion with the preparation of environmental documents.

California Code Section 15064.5 provides guidance on determining the significance of impacts to archaeological and historical resources. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

Environmental Setting:

The Area of Potential Effect (APE) includes all potential areas directly or indirectly affected by the Project, all construction and staging areas, Temporary Construction Easements (TCEs), and construction signage. In total, the APE encompasses approximately 2.27 acres and includes two discontinuous segments centered around each individual bridge: Fornat Wash Bridge (Bridge No. 56C0099) and East Channel Stubbe Wash Bridge (Bridge No. 56C0101). The vertical limit of the APE extends up to 20 feet in depth to accommodate excavation associated with construction of the bridge footings.

Historical Overview:

Regional Development

Trails and roads were important to the Spanish colonial enterprise as they tied Spanish missions and outposts together for communication and supply routes. In 1774, Spanish military Captain Juan Bautista de Anza led an exploratory expedition to establish a land route between Mexico and the settlements in California. On the first expedition, he reached Mission San Gabriel, via

Yuma Arizona, passing to the west of the San Gorgonio Pass, through the San Jacinto Valley. The Spanish reconnaissance missions continued into the desert of Southern California to obtain information on topography, Native American population densities, to catch deserters, and to establish better inland travel routes (Forbes 1964:99; von Till Warren and Roske 1981:ii).

Although very little is known about historic developments in the San Gorgonio Pass before 1820, what is documented is that in 1821 a party of Cocomaricopa Natives had travelled to the San Gabriel Mission and told the Spanish padres of a trail that only took six days to reach the Colorado River. The Spanish were extremely interested in this more direct inland trail that could connect them with Mexico through the Southwest (Forbes 1964:105; von Till Warren and Roske 1981:2). However, in 1821, Mexico won their war of independence from Spain and control of Alta California which delayed pursuit of this route that would later become the Bradshaw Trail that passed through the San Gorgonio Pass. European settlement was slow and sporadic in the San Gorgonio Pass region during much of the Spanish and Mexican colonial era, and few Europeans settled permanently in the area.

On February 2, 1848, California became an American Territory with the signing of the Treaty of Guadalupe-Hidalgo that ended the Mexican American War. Two years later, on September 9, 1850, California became the thirty-first state in the Union (Starr 2005). Southern California was promoted as an ideal agricultural area, with fertile soil and a mild climate. Books on California painted beautiful pictures that appealed to both Americans and Europeans. There were three land booms tied to railroad construction: (1) after the transcontinental railroad was completed, enabling easy travel to California; (2) late 1870s after the Southern Pacific Railroad was completed; and (3) 1886–1888, when the Santa Fe transcontinental line was completed. Competition between the lines incited a rate war, and both tourists and potential settlers took advantage of the low fares to come to California (Lech 2004:222). In the 1870s and 1880s, settlement expanded in the San Gorgonio Pass near the stations built by the new Southern Pacific rail line.

Road and Highway Development in the Inland and Desert Regions of Southern California

State legislation regarding road development began in 1895 when the California Legislature created the Bureau of Highways, which surveyed the state's existing roads and recommended new routes for development. In 1897, the Department of Highways replaced the Bureau. Passage of the State Highways Act in 1909 replaced the Department of Highways with the new California Highway Commission and empowered the California Department of Engineering to issue $18 million in bonds for development of an integrated state highway system. The Legislature authorized an additional $15 million in bonds for highway development in 1915 (Caltrans 2016:75, 84–86). By the summer of 1919, the State of California had funded a total of $73 million in highway improvements (Blow 1920:11).

By 1920, the state system included highway segments in Riverside County and three highway routes through the desert directing traffic to and from San Bernardino, Riverside, and Los Angeles. Also, by 1920, a lateral and newly designated state highway route extended east from the trunk-line highway at Indio approximating the old Bradshaw Road route through the Chuckwalla Valley and on to Blythe at the Colorado River (Blow 1920:202–203). On the national level, a new national highway numbering system took shape during the 1920s. This lateral desert route eventually became designated as a segment of U.S. Highway 60, a transcontinental route from Virginia Beach, Virginia, to Los Angeles. Later planners designated

it as a segment of U.S. Highway 70, a transcontinental route initially from Morehead City, North Carolina, to Holbrook, Arizona, that planners extended into California along U.S. 60 and U.S. 99 (Krintz et al. 2012:8.10; State of California, Department of Public Works 1937; Weingroff 1997).

U.S. Highway 60/70

U.S. Highway 60/70, along with U.S. Route 66 (Route 66) and U.S. Route 80, are the three primary, early transcontinental automobile routes that had their western termini in Southern California. All three had their origins in early automobile travel across the country and were cobbled together from multiple pre-existing state and local routes (Roland et al. 2011:E27). Route 66 and U.S. Highway 80 were the first two routes, established by 1926 (Roland et al. 2011:E25). U.S. Highway 60/70 was cosigned across the Colorado Desert between Blythe and Beaumont between approximately 1932 until approximately 1966 when I-10 replaced the route (State of California, Department of Public Works 1966).

U.S. Highway 60/70 in 1932 did not compare in usage to Route 66 and U.S. Highway 80. However, by 1933, entries into California via U.S. Highway 60/70 surpassed Route 66 at Daggett and doubled within another year. Traffic across U.S. Highway 60/70 steadily increased from the mid-1930s through World War II. U.S. Highway 60/70 was popular both as a tourist route that carried passengers to the popular travel spots of Redlands, Riverside, and Los Angeles, but also to the newly glamorized destination of Palm Springs. In 1936, the California Department of Agriculture began to track commercial vehicles separately from other traffic. The statistics gathered clearly revealed that U.S. Highway 60/70 was the preferred trucking route. U.S. Highway 60/70 remained the most highly traveled truck route into the post-World War II period. While truck traffic along U.S. Highway 60/70 continued to increase into the 1950s, U.S. Highway 80 became the primary east-west truck route into Southern California in the post-war era (Roland et al. 2011:E28-E29).

Railroad Avenue

Railroad Avenue is an approximately 5.2-mile, two-lane, orphaned segment of the 1930s era transcontinental U.S. Highway 60/70. Riverside County designated Railroad Avenue a local, rural road subsequent to its function as a section of U.S. Highway 60/70. Since that time, Railroad Avenue has served primarily as a frontage road for I-10. Railroad Avenue is a lightly traveled road; however, it is also a designated bypass route when I-10 is closed as a result of construction or traffic incidents. Although this happens infrequently, Railroad Avenue can be subject to carrying tens of thousands of vehicles per day when the I-10 is impassable. Additionally, the UPRR uses Railroad Avenue as an access route for utility and maintenance crews.

The segment of U.S. Highway 60/70 that became Railroad Avenue appears to have been reconstructed in 1934 when the two subject timber stringer bridges in the APE were built to carry the cosigned route over the washes (Caltrans 2012a, 2012b; County of Riverside 1915; State of California, Department of Public Works 1937; State of California, Highway Commission 1934; USGS 1940; University of California, Santa Barbara 1936). In 1948, the highway and the two bridges were widened (Caltrans 2012a, Caltrans 2012b; State of California, Department of Public Works Division of Highways 1951). In 1947–1948, I-10 was approved for construction in the

Project area; however, reconstruction and renumbering of the freeway was not completed until 1966.

During construction of I-10 in the Project area, the original route of the westbound lanes of U.S. Highway 60/70/99 was graded over to make way for construction of the new eastbound lanes, and the new westbound lanes for I-10 were built to the north. The original eastbound lanes of U.S. Route 60/70/99 were bypassed, and the two-lane, orphaned segment became Railroad Avenue (State of California, Department of Public Works 1947; State of California Highways Commission 1966; USGS 1955.).

Timber Bridges

Wood stringer bridges are an old type of design that dates to the origins of bridge construction (Parsons Brinckerhoff and Engineering and Industrial Heritage 2005:3-80). Timber-stringer bridges are constructed of a series of closely spaced stringers that typically span between timber bents with multiple columns. This type of bridge was generally used for small, straightforward span crossings, such as over ditches/culverts, which presented no engineering difficulties. Even after the availability of other materials such as concrete and steel, timber bridges were still built due to their simplicity and the ready availability of materials. Today, this bridge type is still constructed utilizing rot-resistant materials, primarily on low-trafficked rural and backcountry roads.

The earliest bridges in California were constructed of timber, most likely because it was the only material available. With the growing demands of automobile usage in the state in the late nineteenth and early twentieth centuries, engineers increasingly chose steel and concrete over timber for bridges and utilized new technological advancements in bridge design. However, despite these design advancements and the availability of new materials, timber bridges were still constructed on primarily secondary or lower-use roads. As of 2004, there were 530 timber-stringer bridges remaining in California that were built before 1960. The majority of these were constructed in the 1930s through the 1950s on local roads; only 16 were built before 1930, and only three before 1920 (Hope 2004:13).

Pacific Crest Trail

In the early half of the twentieth century, the PCT began as a proposition for a scenic travel corridor stretching across the western states of California, Oregon, and Washington. Author and mountaineer Joseph T. Hazard cites Montgomery, an avid outdoorswoman and teacher, as the first person to propose such an idea to him as early as 1926. Shortly after, Fred Cleator's trail mapping work in the Pacific Northwest would establish some of the first official segments of the PCT. However, it is Clinton C. Clarke, credited as the "Father" of the PCT, who would ultimately put the gears in motion for a completely unified western trail (Howell 2019).

Rather than establishing an entirely new corridor for the PCT, one of the major features of the project was to link several already established travel corridors into a single route. The 442-mile Oregon Skyline Trail, which is considered the first developed portion of the PCT, spanned from Mount Hood to Crater Lake. That trail would ultimately continue into Washington through the 445-mile Cascade Trail. The 185-mile John Muir Trail and 339-mile Lava Crest trail would also be utilized. The last leg of the northern segment of the PCT would extend south of Crater Lake to the northern border of California. The southern portion of the PCT would extend from

California's northern border, down to the Mexican border in the south. It encompassed the 249-mile Tahoe-Yosemite Trail, 137-mile Sierra Trail, and the 406-mile Desert Crest Trail along with several new trails to connect them. The southernmost portion of the PCT started at the town of Campo near the Mexican border and would extend for nearly 650 miles (Howell 2019).

While the initial planning for the trail was mostly complete, it became the work of the Young Men's Christian Association (YMCA) and one of its secretaries, Warren Lee Rogers, to assess its feasibility in the field. A series of "flag-relay exploring expeditions" was utilized in order to survey the proposed route of the PCT in its entirety. Once a group would finish its leg, another would pick up and continue onward until the trail was completely traversed. The evaluation took a total of four summers to complete and spanned a total distance of 2,300 miles. On June 5, 1993, completion of the PCT was marked by a Golden Spike ceremony near Soledad Canyon in Southern California. The trail, as it stands today, spans 2,650 total miles (Howell 2019).

The route of the PCT under the bridges of I-10 and Railroad Avenue over East Channel Stubbe Wash within the APE was established circa 1976 (Pacific Crest Trail Association [PCTA] 2019a, 2019b). The original route established in this area in 1973 was to the east and went under Highway 111 Whitewater River Bridge and followed Whitewater River to the fish hatchery (U. S. Department of Agriculture – Forest Service 1973).

Description of Cultural Resources:
Pursuant to sections a and b of the 36 CFR 800.4 Identification of Historic Properties and to PRC Section 5024.1, the Project's APE was surveyed for historic properties. The APE is located along Railroad Avenue and includes approximately 2.27 acres. Three historic-period built-environment resources were identified within the APE including a transcontinental highway, a road with two features (the two subject timber-stringer bridges), and a trail. One resource, the cosigned transcontinental U.S. Highway 60/70 was recently documented, evaluated, and determined ineligible for listing in the NRHP as part of an associated project. Railroad Avenue (including the two associated subject bridges) located within the APE is more than 45 years old according to historic aerials, maps, and archival sources. The final resource, the PCT, was established within the APE circa 1976 (43 years old). However, the portion of the trail within the APE is part of a larger nationally significant trail and is therefore eligible for listing on the NRHP with a period of significance from 1935 (when the trail was officially planned) until 1992 (when the trail was declared complete).

Pacific Crest Trail

In its totality, the PCT is 2,650 miles long, stretching from the town of Campo near the Mexican border at the southern terminus to Manning Park in British Colombia at the northern terminus. A portion of the PCT, approximately 373-feet, bypasses (by going underneath) the Union Pacific Railroad, Railroad Avenue, and the I-10 freeway between Cabazon (to the west) and Whitewater (to the east). This recorded portion is part of the transition between the San Jacinto Mountains to the south into the San Bernardino Mountains to the north. The trail here is simply a well traversed path along an alluvial wash with no specific built features.

U.S. Highway 60/70

Cosigned U.S. Highway 60/70 in California is the western terminus of the 1930s-era historic U.S. Highway 60/70 transcontinental highway or auto trail. U.S. Highway 60/70 is the last

designated of three transcontinental routes into California along with U.S. Highway 66 (Route 66) and U.S. Highway 80. Both transcontinental U.S. Highway 60 and U.S. Highway 70 originated on the east coast in Virginia and North Carolina respectively.

Railroad Avenue

Railroad Avenue is a 5.2-mile local, two-lane frontage road that runs between the southbound lanes of the I-10 and the Southern Pacific Railroad between Main Street in Cabazon and Haugen-Lehman Way in Whitewater. No evidence was located that documents the exact date that this segment of the former U.S. Highway 60/70 was designated Railroad Avenue. Roads on this same general alignment have passed through this region since the time of wagon trails. Like other older roads, Railroad Avenue has evolved over time and the earlier changes are difficult to narrow to a specific date. What is documented, is that U.S. Highway 99 was the first numbered interstate highway signed onto an existing local route in 1926 followed by the reconstruction and signing of U.S. Highway 60/70 by 1932 (Roland et al 2011:E27; Livingston 2010; State of California, Department of Public Works 1930, 1937). In the mid to late 1960s, the construction of I-10 replaced U.S. Highway 60/70, leaving extant, orphan segments, such as Railroad Avenue, to serve as local and frontage roads for the railroad and newer highways.

Timber Bridges

The two subject bridges are described as three-span timber bridges constructed in 1934 to carry U.S. Highway 60/70/99 over the washes. The bridges span the relative ditches constructed along the U.S. Highway 60/70 to divert flood waters under the highway. Below is a description of each bridge structure:

- The Fornat Wash Bridge (Bridge No. 56C0099) consists of a three-span (skewed) timber-stringer bridge that spans the Fornat Wash. The bridge is constructed of timber pile piers and wood abutment walls. The deck is approximately 59 feet long with a width of 32 feet. Short timber wing walls extend an additional 4 feet to either side of the deck to support the bridge's road approach giving an overall length of approximately 67 feet. The bridge substructure consists of sawn timber piles arranged against board abutments on the west and east, and two sawn timber columns dividing the spans. Timber stringers that support 2 by 4 decking are visible along the side elevations. These are topped by a concrete layer comprising the curbs, deck, and end caps at either road approach. Two central columns are made of similar log piles. The underside of the bridge is situated approximately 2 feet above the wash floor with 4-foot by 10-foot timber beams spaced with block struts and covered with peeling textured stucco, possibly as a fire retardant. Four-by-four timbers attached with various types and ages of bolts support the bridge guardrails which are of contemporary metal on the north elevation and of 4 by 4 timbers in "Z" joinery on the south. Contemporary metal warning paddle signs and reflectors are attached at intervals.

  The sufficiency rating of this bridge is 62.9 with a designated status of "Structurally Deficient" (Caltrans 2012a). According to Caltrans Local Agency Historic Bridge Inventory, this bridge is listed as a Category 5, "Bridge not eligible for NRHP". Therefore, the bridge was not individually evaluated, but was evaluated as a feature of Railroad Avenue. The structure appears to be in fair condition with some deterioration of the original timber stringers from debris flowing in the wash. Repairs are in-kind and seem consistent with the 1940s repairs and reconstruction.

- The East Channel Stubbe Wash Bridge (Bridge No. 56C0101) consists of a three-span (skewed) redwood timber-stringer bridge that spans the East Channel Stubbe Wash. East Channel Stubbe Wash Bridge is constructed of timber pile piers, concrete, and wood abutment walls. Timber wing walls fan out from the abutments and are similarly constructed. The deck is coated with asphalt, is approximately 59 feet long and 32 feet wide, and stands approximately 12 feet above the wash floor. The substructure consists of log columns arranged against board abutments with 4 by 4 timbers bolted across the logs as support. Large timber beams spaced with block struts and the two columns of log piles, some of which are encased with metal and concrete, are present at the high-water level. On the west and east, two log pile columns divide the three spans. Timber bent caps support timber stringers and beams, all topped with 2 by 4 decking which is visible between the beams on the underside of the deck. A concrete layer comprises the curbs, deck, and four end caps at the road approaches. Four-by-four timbers attached to the stringers with various types and ages of bolts support the 4 by 4 timber bridge guardrails in modified "Z" joinery on the south. Contemporary metal warning paddle signs and reflectors are attached at intervals.

  The sufficiency rating of this bridge is 59.1 with a designated status of "Structurally Deficient" (Caltrans 2012b). According to Caltrans Local Agency Historic Bridge Inventory, this bridge is listed as a Category 5, "Bridge not eligible for NRHP". Therefore, the bridge was not individually evaluated, but was evaluated as a feature of Railroad Avenue. The structure appears to be in fair condition with some splitting of timbers in the center piers. Repairs are in-kind and seem consistent with the 1940s repairs and reconstruction.

Significance Evaluation for Inclusion in NRHP and CRHR:

A historic resource is determined eligible for the National Register and California Register based on the integrity of the resource and its association to American history, architecture, and culture. To be listed in the National or California Register, the historic resource must not only be shown to be significant under the National/California Register criteria, but it also must have integrity. Within the concept of integrity, there are seven aspects or qualities that, in various combinations, define integrity. These are location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity a property will always possess several, and usually most, of the aspects.

Pacific Crest Trail

The PCT is considered eligible for listing on the NRHP/CHRH under Criterion A/1 at the national level as it's a world-renowned National Scenic Trail directly associated with the exponential growth of American outdoor recreation and conservation during the twentieth century. Due to its large size, the PCT has not been evaluated in its entirety, and it is beyond the scope of a single undertaking to conduct a thorough evaluation of such an immense resource. Until such time as the PCT can be fully evaluated, the PCT should be considered eligible under Criterion A/1 at the national level because the Pacific Crest Trail (PCT) is a world-renowned National Scenic Trail directly associated with the exponential growth of American outdoor recreation and conservation during the twentieth century. The period of significance is from 1935 when the Pacific Crest Trail System Conference (PCTSC) occurred, to 1993, when the entirety

of the trail was officially dedicated. In general terms, the following should be considered the character defining features of the trail:

- Overall alignment that minimizes usage of private land with a majority of the trail through National Forests and protected wilderness.
- Trail location that generally avoids civilization, and only enters more developed and populated areas when necessary to maintain a continuous route.
- Trail location that generally traverses scenic and pristine mountainous terrain with few roads.

  Routed to remain in close proximity to the crest of mountain ranges as much as possible, and only descends when necessary to maintain a continuous route.
- The resource's light footprint on the landscape.

The portion of the PCT within the APE exists in its original circa 1976 alignment; therefore, it has a high level of location. The modern San Gorgonio Pass regional landscape features Interstate 10, billboards, the Union Pacific Railroad, wind farms, facilities for electricity and water, as well as small rural desert neighborhoods. The current viewshed of the recorded segment is mostly unchanged since this portion of the PCT was established in 1976, retaining a high level of setting. The recorded portion of the PCT retains its original design, materials, and workmanship. The segment's association with outdoor recreation in the 20th century is high and it retains a high level of feeling. Thus, this recorded portion of the PCT is eligible for listing in the NRHP and CRHR under Criterion A/1 as a nationally significant recreational trail directly associated with the exponential growth of American outdoor recreation and conservation during the twentieth century.

U.S. Highway 60/70

U.S. Highway 60/70 is significant under Criterion A/1 as an important transcontinental automobile highway that represents important trends in early twentieth-century highway planning in California and across the country. As one of the three "all-weather" transcontinental highways into Southern California, U.S. Highway 60/70 is also significant culturally as a highly utilized travel and migration route and recognized tourist highway across the Colorado Desert. Finally, U.S. Highway 60/70 is significant as a symbol of commerce. The highway became the most favored commercial trucking route of the three transcontinental highways, a distinction it held until the mid-century. I-10 replaced much of this highway in California by the end of the 1960s which is evidence that it remained a good, direct route with minimal geographic barriers. The period of significance for this resource is from 1932, when signed, to 1967, when the completion of I-10 through the Colorado Desert corridor left 16 orphan segments between Blythe and Beaumont.

Although U.S. Highway 60/70 is significant under Criterion A/1, it does not retain sufficient historic integrity to convey significance under NRHP/CRHR Criterion A/1. The approximately 150-mile Colorado Desert corridor of U.S. Highway 60/70, 90 miles (60 percent) of the former transcontinental highway alignment was either eliminated by the construction of I-10 or does not retain sufficient historic integrity to convey significance under NRHP/CRHR Criterion A/1. The longest intact segment of the former highway is the 16.75-mile Chuckwalla Valley Road segment. The next longest are the approximately 11.1-mile-long Blythe segment and the

approximately 9.8-mile-long Varner Road segment east of Cathedral City. However, there are long stretches of the corridor that have no surviving segments or a combination of no surviving segments and segments with insufficient historic integrity to convey significance. These include approximately 12 miles of the corridor east of Beaumont, approximately 21 miles of the corridor east of Indio, 17 miles of the corridor at Chiriaco Summit to the east, and 15 miles of the corridor west of Blythe. By way of comparison, the NRHP-listed U.S. Highway 80 Historic District in California consists of abandoned and realigned transcontinental highway segments that date to the property's 1926–1964 period of significance, and that stretch contiguously across the 180-mile length of that corridor from San Diego to the state border at the Colorado River west of Yuma, Arizona. U.S. Highway 60/70 has significance under Criterion A as Southern California's third and most frequently traveled transcontinental highway for business and pleasure. However, in weighing that significance against the length of the highway corridor in which the resource remains extant and potentially retains sufficient integrity to convey significance, the resource does not retain sufficient historic integrity to convey significance under Criterion A/1. Therefore U.S. Highway 60/70 is not eligible for listing in the NRHP or the CRHR.

Railroad Avenue

Despite Railroad Avenue's important function as a detour route for I-10, interstate in the late 1960s, and UPRRs utilization for access to the railroad line, Railroad Avenue has not contributed to the broad patterns associated with local, state, or national history. Therefore, it has not significantly contributed to culture, economics, or politics, and is therefore not eligible under Criterion A/1. Additionally, the road is not known to be associated with significant person(s) associated with local, state, or national history; is not the work of a master and does not possess high artistic value; and is not likely to yield new information on road construction methods. Due to a lack of significance, Railroad Avenue is recommended ineligible for inclusion in the NRHP or CRHR.

Timber Bridges

According to Caltrans Local Agency Historic Bridge Inventory, these bridges are listed as a Category 5, "Bridge not eligible for NRHP." Therefore, the bridges were not individually evaluated but were considered as a feature of Railroad Avenue. Because Railroad Avenue does not qualify as a significant resource under any of the four NRHP/CRHR criteria, the two subject bridges lack historical significance as features of Railroad Avenue.

A portion of the PCT passes under the bridges that carry I-10, Railroad Avenue, and the Union Pacific Railroad across East Channel Stubbe Wash. The PCT generally avoids civilization and developed areas and traverses scenic and pristine mountainous terrain with few roads. The PCT in this area has to descend into developed areas of the San Gorgonio Pass from the San Bernardino Mountains to the north, across the desert valley, and re-ascend into the San Jacinto Mountain range to the south in order to maintain its unbroken route, a significant character defining feature of the PCT. This transition requires the trail to cross railroad lines as well as local roads and interstate highways. Since it is not feasible for hikers to walk across these dangerous obstacles, the recorded portion of the trail was routed under the bridges that carry these obstacles, including East Channel Stubbe Wash Bridge, strictly for safety purposes. East Channel Stubbe Wash Bridge is not historically significant as a character defining feature of the PCT.

Impact Analysis:

a) Less than Significant Impact. The Project proposes to demolish two existing timber bridges along Railroad Avenue and replace them with modern concrete bridges. Bridge demolition would include removal of existing wooden wing walls, abutments, and piers, and replacement with modern concrete alternatives. California Code Section 15064.5 provides guidance on determining the significance of impacts to historical resources and defines a substantial adverse change in the significance of an historical resource as meaning physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Forty-two (42) feet of the PCT would be affected by the demolition and construction of the East Channel Stubbe Wash Bridge, which would require two temporary closures and a trail detour to the adjacent West Channel Stubbe Wash. Once construction is completed, the recorded portion of the trail would be returned to its original route. Additionally, demolition and replacement of the bridge would require excavation for pier removal and installation of new foundations that would affect the PCT. However, this area of the PCT is ever-changing due to water flows and the composition of the alluvial drainage. Therefore, this effect would be temporary as the trail surface would eventually return to its pre-Project state.

The area beneath the East Channel Stubbe Wash Bridge offers the quietest spot for hikers to stop as they travel this busy portion of the PCT. Online, hikers recount their experiences of the desert setting, shade and shelter provided by the bridges, and even of the "trail magic" (gifts and notes) left under or near the bridges by "trail angels" (other hikers and residents). Like the alluvial bed of the wash that forms the trail path itself, the gifts and notes from the "trail angels" are not character-defining features of the trail. The new bridge structure would continue to allow for passage by hikers and is anticipated to be used in a similar manner. Therefore, the proposed changes would not diminish the integrity of the PCT's significant historic features.

Continuity of the unpaved trail is the primary character-defining feature for the portion of the PCT within the APE that contributes to the larger PCT's historical significance. Although the East Channel Stubbe Wash Bridge is a prominent element of the trail's desert transportation-corridor setting within this portion of the PCT, the timber construction of the bridge is not a character defining feature of the trail. Replacement of the bridges would introduce a permanent minor visual change to the PCT within this section of the trail; however, because the timber construction of the bridge is not a character-defining feature of the PCT, the minor visual change would not compromise the setting to the extent that is significant. The new bridge structure would not diminish the trails significant historic features nor result in a significant impact on the PCT.

b) Less than Significant Impact. An archaeological survey of the APE was completed to assess the presence or absence of intact cultural materials. The survey determined that a majority of the APE is previously disturbed by construction of I-10 to the north and Railroad Avenue on both sides of the bridges. The only areas of general undisturbed contexts are the portions within the washes underneath the bridges, however, no archaeological resources were identified. Although no archaeological resources were found, the APE is in soils that have moderate to high sensitivity for buried archaeological deposits (Qa) and therefore, excavation for the Project may have the potential to unearth archaeological resources. To avoid potential impacts to unknown archaeological resources, avoidance measure **CR-1** would be implemented.

c) Less than Significant Impact. There are no known human remains or cemeteries within the APE; however, Project excavation may have the potential to unearth unmarked burials. To avoid the potential for impacts on unmarked burials, avoidance measure **CR-2** would be implemented to assess the significance of human remains discovered during construction.

Avoidance, Minimization, and/or Mitigation Measures:

The following avoidance measures would be implemented to avoid the potential impacts on undiscovered archaeological resources and human remains.

CR-1: If cultural materials are discovered during construction, all earth-moving activity within 60 feet around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.

CR-2: If human remains are discovered, Health and Safety Code Section 7050.5 states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendent (MLD). At this time, the construction contractor will coordinate with the County so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

3.6 Energy

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Source(s): Information in this section is based on California Assembly Bill (AB) 32 (2006), CARB, County of Riverside Climate Action Plan (CAP) Update (November 2019), and the Western Riverside Council of Governments (WRCOG) Subregional CAP (September 2014).

Regulatory Setting:

CEQA Guidelines section 15126.2(b) and Appendix F, Energy Conservation, require an analysis of a project's energy use to determine if the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources.

AB 32

AB 32, the California Global Warming Solutions Act of 2006, requires CARB to adopt a statewide GHG emissions limit equivalent to the statewide greenhouse gas emissions levels in 1990 to be achieved by 2020. CARB shall adopt regulations to require the reporting and verification of statewide greenhouse gas emissions and to monitor and enforce compliance with this program. AB 32 directs the Climate Action Team established by the Governor to coordinate the efforts set forth under Executive Order S-3-05 to continue its role in coordinating overall climate policy.

County CAP

The County of Riverside CAP identifies how the County will comply with California and local energy and GHG reduction policies. The plan lists energy related measures that the County can incorporate into existing residential and non-residential buildings or new development projects to achieve a State-aligned GHG emissions reduction target.

Environmental Setting:

There are generally two types of energy consumption – direct and indirect. Direct energy is the energy consumed by vehicles using the Project. Indirect energy is the one-time energy consumption for construction and the energy needed to maintain the facility.

Railroad Avenue is classified as a local rural road with limited vehicle use and has no streetlights or illuminated signage. Primary sources of energy consumption include vehicles using the road for local access, as a temporary bypass to the I-10, and for maintenance activities.

Impact Analysis:

a) Less than Significant Impact. The proposed Project consists of replacing two existing bridge structures. During the 12-month construction period, the Project would use a variety of construction equipment including excavators, trucks, pile drivers, compactors, and bulldozers. Construction activities would primarily use diesel and gasoline for the use of equipment associated with demolition, debris hauling, materials delivery, and construction equipment. Energy consumption would also include gasoline used by construction workers driving to and from the Project area. Construction activities would result in a one-time energy expenditure.

Regarding long-term energy consumption, no new permanent source of energy demand would result from Project implementation. Once implemented, the Project would maintain the existing rural roadway conditions and would not result in a change in direct energy use (i.e., no additional vehicles would use the new facility). On-going maintenance energy requirements are expected to decrease since the bridges would be brand new. Therefore, no additional energy consumption and no new permanent source of energy demand for street or traffic lighting or fuel for maintenance activities would be required. Accordingly, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

b) No Impact. Two regional CAPs – the County of Riverside CAP Update (November 2019) and the WRCOG Subregional CAP (September 2014) – are relevant to the Project. The goal of the County of Riverside CAP is to integrate the County's past and current efforts with its future

efforts to grow and thrive sustainably. The goals of the WRCOG CAP includes promoting healthier communities, reducing emissions, and improving air quality.

The Project proposes a direct replacement of the existing bridge structures and would not increase vehicular capacity. Replacement of the bridge structures is expected to result in a decrease in maintenance energy requirements since the bridges would be brand new. Therefore, the Project would slightly decrease energy usage and GHG emissions. Additionally, all construction contracts include Caltrans' Standard Specifications Section 7-1.02A and 71.02C, Emissions Reduction, which require contractors to comply with all laws applicable to the Project and to certify they are aware of and will comply with all ARB emission reduction regulations; and Section 14-9.02, Air Pollution Control, which requires contractors to comply with all air pollution control rules, regulations, ordinances, and statutes.

The proposed Project would implement minimization measures **GHG-1** through **GHG-3** to further reduce construction emissions. Because the Project would decrease operational energy consumption, the Project would not conflict with the County or WRCOG CAPs.

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the minimization measures identified below, the Project will further align with the County and WRCOG CAPs.

GHG-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions will be controlled by regular watering, or other dust preventive measures using the following procedures as specified in the South Coast Air Quality Management District Rules and Regulations:

- Onsite vehicle speed will be limited to 25 miles per hour;
- During clearing, grading, earthmoving, or excavation operations, areas being excavated or graded will be sufficiently watered to prevent excessive amounts of dust. Watering should occur at least twice daily with complete coverage preferable in the late morning and after work is done for the day;
- All soil material transported onsite or offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust;
- Areas disturbed by clearing, grading, earth moving, or excavation activities will be minimized to prevent excessive dust;
- Visible dust beyond the construction limits emanating from the Project will be prevented to the maximum extent feasible.

GHG-2: Ozone precursor emissions from construction vehicles will be controlled by maintaining equipment engines in good condition, and properly tuned per manufacturer's specifications, to the satisfaction of the resident engineer.

GHG-3: All trucks that are to haul excavated or graded material offsite will comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

3.7 Geology and Soils

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Source(s): Information in this section is based on *Preliminary Foundations Report* (January 2020), *Paleontological Technical Memorandum* (July 2021), and the *Natural Environment Study (Minimal Impacts)* (February 2020).

Regulatory Setting:

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (referred to as earthquake fault zones). It defines criteria for identifying active faults, giving legal weight to terms such as active, and establishes a process for reviewing building proposals in and adjacent to earthquake fault zones. It also regulates seismic retrofits of some types of structures.

Seismic Hazards Mapping Act of 1990

The Seismic Hazards Mapping Act of 1990 is intended to avoid or reduce damage resulting from earthquakes. While the Alquist-Priolo Earthquake Fault Zoning Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Earthquake Fault Zoning Act: the state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards; and cities and counties are required to regulate development within mapped seismic hazard zones.

Environmental Setting:

The Project area is not within an Alquist-Priolo Earthquake Fault Zone. The closest mapped faults are two segments of thrust faults belonging to the San Gorgonio Pass Fault Zone (Treiman, 1994). According to the Alquist-Priolo Special Studies Zone map for this area, the Fornat Wash bridge is about 2,900 feet southeast of a northeast trending section of the San Gorgonio Pass Fault Zone and the East Channel Stubbe Wash bridge is about 1,400 feet south of a separate section of the mapped trace of the San Gorgonio Pass Fault Zone.

The Project area is regionally located in the San Gorgonio Pass, a narrow alluvial valley bounded by the San Bernardino Mountains to the north and the San Jacinto Mountains to the south. The bridges are situated on the mid-fan to distal sections of a 2- to 3-mile-long alluvial fan complex emerging from the San Bernardino Mountains to the north. The alluvial fans are Pleistocene in age and are slightly dissected by active channels flowing to the southeast such as Fornat Wash and Stubbe Wash. Static groundwater is deep at the Project area.

Soils mapped within the Fornat Wash Bridge BSA consist of stony and gravelly loamy sands and fine sands (see **Figure**). The soils series are Gorgonio gravelly loamy fine sand, Soboba stony loamy sand, Tujunga gravelly loamy sand (USDA/NRCS 2019). Soils mapped at the East Channel Stubbe Wash Bridge BSA consist of fine sands to gravelly loamy sands (see **Figure**). The soils series are Carsitas gravelly sand, Myoma fine sand, Tujunga gravelly loamy sand, and river wash (USDA/NRCS 2019). Soils beneath the proposed bridge replacement footings are generally dense to very dense.

Figure 17. Soils at Fornat Wash Bridge

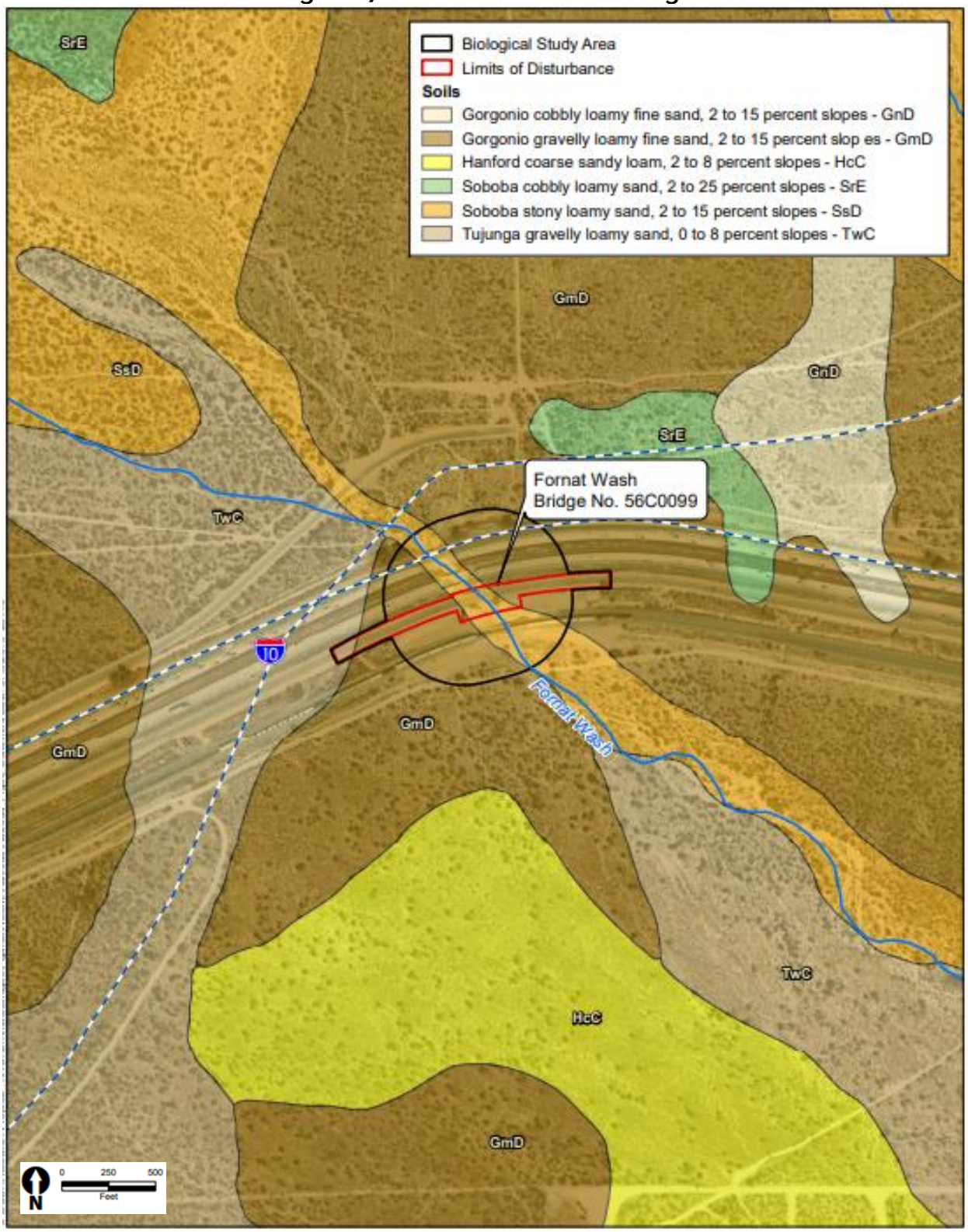
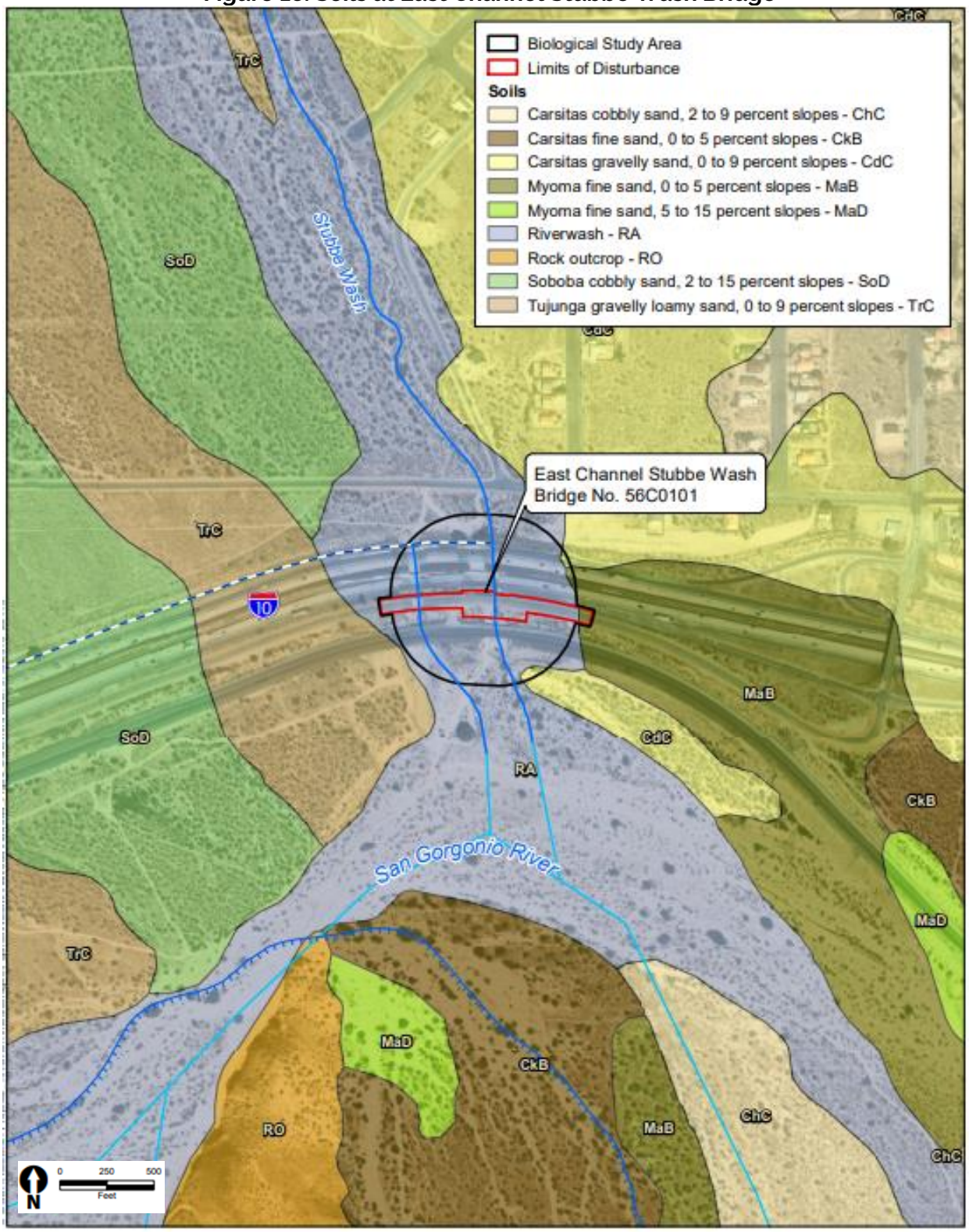


Figure 18. Soils at East Channel Stubbe Wash Bridge



Impact Analysis:

a (i-iv)) No Impact. The risk of fault rupture at the bridge sites is considered low because the closest fault is over 1,000 feet from the nearest bridge. The proposed bridges would be designed to meet the latest seismic standards to reduce the effects of seismic activity.

For liquefaction to occur, three conditions must simultaneously exist: loose to medium-dense granular soils, saturation of the soils by groundwater (typically upper 50 feet), and strong earthquake ground motion. Soils at the Project location are granular and generally dense to very dense and static groundwater is deep. Therefore, liquefaction risk is low.

No major slopes are present at Fornat Wash. Existing embankment slopes to the south of the bridge at East Channel Stubbe Wash are inclined and about 18 feet high with toe of slope covered by riprap.

Therefore, impacts related to fault rupture, ground shaking, liquefaction, and landslide would have no impact, and no mitigation is required.

b) Less than Significant Impact. Site clearing and grubbing, earthmoving activities, and excavation during construction, would result in soil disturbance, rendering surface soil susceptible to erosion. Eroded soil can runoff into surface water causing water pollution. Similarly, compaction of soils by heavy construction machinery may reduce the infiltration capacity of soils exposed during construction and increase runoff and erosion potential. When access to the channel bottoms is needed to construct the pile columns and cast-in-drilled-hole pile installations, the contactor may utilize a temporary earthen access ramp constructed in the channels. This earthen ramp would be protected by erosion and sediment control BMPs to reduce potential erosion of the earthen ramp. The County would implement the specific requirements of the California NPDES Construction General Permit including the Project-specific Stormwater Pollution Prevention Plan (SWPPP) (see measure **WQ-1**). The SWPPP will implement practices and control measures, including erosion control, onsite during construction activities. In addition, the Project would not alter existing drainage patterns post-construction, as post-construction conditions are expected to equal pre-construction conditions. Implementation of minimization measure **BIO-1** would ensure all temporary construction areas would be returned to preconstruction contours, and hydroseeded with a native seed mix. With the implementation of **WQ-1** and **BIO-1**, impacts related to soil erosion or loss of topsoil would be avoided.

c) No Impact. The Project is in an area that consists of stony and gravelly loamy sands and fine sands. These soil types do not tend to expand and shrink when saturated; therefore, the Project is not located on unstable soils. Additionally, to avoid disturbing soil, the existing piles that conflict with new pile caps would be cut off below the new pile cap level.

d) No Impact. Expansive soils have a significant amount of clay particles which can give up water (shrink) or take on water (expand). Soils within the Project area consist of stony and gravelly loamy sands and fine sands. Sandy soils are generally considered to be non-expansive or have very low expansion potential. Therefore, the Project would not be located on expansive soil, nor would it create a substantial direct or indirect risk to life or property.

e) No Impact. The proposed Project would be a direct replacement of existing bridge structures and would not require the use of septic tanks or other wastewater disposal systems.

f) Less than Significant Impact. Geologic maps, paleontological literature, and records search results were reviewed to determine the paleontological sensitivity of the Project area. Based on the findings, the Project area was identified as having a 'High Potential' for paleontological resources, although depths at which fossils may be encountered, if present, could vary. This contrasts with the County's (2015) paleontological sensitivity map, which shows the entire surface area of the Project to be 'Low Potential.' The difference between the findings for the Project and the County's map suggests the Project area may require additional investigation, such as a pre-construction survey, to confirm the accuracy of the desktop results. With implementation of avoidance measures **PAL-1** and **PAL-2**, direct or indirect impacts to potentially unique paleontological resources or sites or unique geologic features would be less than significant.

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the avoidance and minimization measures identified below, the Project would have a less than significant impact on geology and soil.

Avoidance measures:

WQ-1: Stormwater Pollution Prevention Plan (SWPPP). A California Construction General Permit SWPPP and an EPA Construction General Permit SWPPP for portions of Project area occurring on Tribal Lands will be developed and implemented prior to construction.

PAL-1: Preparation of a PRIMP. Prior to any ground disturbing activities, the preparation of a paleontological resource impact mitigation program (PRIMP) will be prepared by a qualified professional paleontologist (Project Paleontologist) who meets the Society of Vertebrate Paleontology's standards (2010). The purpose of the PRIMP is to establish procedures and discovery protocols based on industrywide best practices for the treatment of any paleontological resources encountered during Project related earth-disturbing activities related to Project construction. The PRIMP will include a Worker Environmental Awareness Program (WEAP) training, which would be implemented prior to the start of Project-related ground disturbance. WEAP training should be presented in-person to all field personnel to describe the types of fossils that may be found and the procedures to follow if any fossils are encountered. The PRIMP will indicate where construction monitoring will be required for the Project and the frequency of required monitoring (i.e., full-time, spot-checks, etc.).

PAL-2: Pre-Construction Paleontology Survey. A pre-construction survey will be conducted to ground truth the results of the records search conclusion of high sensitivity prior to grading to avoid potential permanent impacts. The pre-construction survey will collect and process sediment samples to determine the small-fossil potential of the APE. Any fossils uncovered during construction activities will be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

Minimization measure:

BIO-1: Temporary Construction Areas. Post-construction, all temporary construction areas and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix. Ephemeral washes and their

banks will be left with an earthen, sandy bottom. No riprap or other obstructive material will be placed under the new bridges.

3.8 Greenhouse Gas Emissions

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Source(s): Information in this section is based on the Project GHG Emissions Analysis completed for the Project and the County of Riverside CAP (2019 update).

Regulatory Setting:

California has been innovative and proactive in addressing GHG emissions and climate change by passing multiple Senate, AB, and Executive Orders (EOs) including, but not limited to, the following:

California Global Warming Solutions Act

California Global Warming Solutions Act of 2006 requires the ARB to adopt statewide greenhouse gas emissions by 2020 that are equivalent to the statewide greenhouse gas emissions levels of 1990. ARB adopted regulations that may require statewide gas emission reporting and verification to monitor and enforce compliance with this program. AB 32 will further direct the Climate Action Team, established by the Governor, through coordination efforts set forth under Executive Order S-3-05 that maintain strict climate policy standards.

Senate Bill 375-Redesigning Communities to Reduce Greenhouse Gases

SB 375 requires the ARB to develop regional GHG emission reduction targets for passenger vehicles. The ARB establishes 2020 and 2035 targets for each region covered by one of the State's 18 metropolitan planning organizations.

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to GHG emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change by the United Nations and World Meteorological Organization in 1988 increased efforts to reduce GHG emissions and advance climate change research and policy. These efforts target emissions of GHGs generated by human activity, including carbon dioxide (CO2), methane (CH4), nitrous oxide (N_2O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF6), and various hydrofluorocarbons (HFCs). CO2, the

most abundant GHG, is a natural component of Earth's atmosphere. However, fossil-fuel combustion has contributed to an additional source of human-generated CO2.

Two terms are typically used when discussing how we address the impacts of climate change: "greenhouse gas mitigation" and "adaptation." Greenhouse gas mitigation covers the activities and policies aimed at reducing GHG emissions to limit or "mitigate" the impacts of climate change. Adaptation, on the other hand, is concerned with planning for and responding to impacts resulting from climate change (such as adjusting transportation design standards to withstand more intense storms and higher sea levels).

Environmental Setting:

The Sacramento Metropolitan Air Quality Management District's Road Construction Emissions Model, Version 8.1.0 was used to estimate construction emissions for the Project. Inputs to the model were provided by the Project's construction engineers. The Project is in the Salton Sea Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As such, the construction phase regional emissions were compared to the SCAQMD "significance" thresholds, which are as follows:

- 100 pounds per day of NOx
- 75 pounds per day of volatile organic compounds (VOC)
- 150 pounds per day of PM10
- 55 pounds per day of PM2.5
- 150 pounds per day of SOx
- 550 pounds per day of CO
- 10,000 metric tons/year of carbon dioxide equivalent (CO2e) for industrial facilities

Projects with construction-related emissions that exceed any of these emission thresholds are considered significant.

Table 8 below summarizes emissions of criteria pollutants per phase and the maximum emissions in pounds/day; emissions include both vehicle exhaust and fugitive dust.

Table 8. Estimated Construction Emissions of Criteria Pollutants (pounds/day)

Project Phase	NOx	VOC	Total PM10	Total PM2.5	SOx	CO
Grubbing/Land Clearing	0	0	0	0	0	0
Grading/Excavation	74.0	7.6	9.1	4.1	0.2	69.4
Drainage/Utilities/Sub-Grade	50.5	5.3	8.0	3.2	0.1	50.8
Paving	7.8	0.9	0.4	0.3	0.1	12.7
Maximum Emissions	**74.0**	**7.6**	**9.1**	**4.1**	**0.2**	**69.4**
SCAQMD Threshold	**100**	**75**	**150**	**55**	**150**	**550**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

The total estimated GHG emissions for the Project construction period are shown in **Table 9** below.

Table 9. Estimated Construction GHG Emissions (metric tons/phase)

Project Phase	CO_2	CH_4	N_2O	CO_2e
Grubbing/Land Clearing	0	0	0	0
Grading/Excavation	1,169	0.31	0.01	1,071
Drainage/Utilities/Sub-Grade	231	0.06	0.00	212
Paving	243	0.06	0.00	222.85
Maximum Emissions	**1,169**	**0.31**	**0.01**	**1,071**
Total (metric tons/construction project)	**1,643**	**0.43**	**0.02**	**1,506**

Impact Analysis:

a) Less than Significant Impact. The Project would generate GHG emissions during construction. Construction activities would primarily include diesel and gasoline equipment including excavators, trucks, pile drivers, compactors, and bulldozers. The equipment would be used for clearing and grubbing, bridge demolition and construction, debris hauling, materials delivery, and construction crew transport. These emissions are produced at different levels throughout the construction phase. Nevertheless, their frequency and occurrence can be reduced through implementing minimization measures.

The total estimated GHG emissions for the Project construction period are 1,506 metric tons of CO2e. The total GHG emissions for the Project would be well below the SCAQMD threshold of 10,000 metric tons/year. Since none of the estimated emissions exceed SCAQMD significance thresholds, the Project is not considered to be potentially significant. However, minimization measures **GHG-1** through **GHG-3** would be implemented to further reduce construction emissions.

Operational Emissions

The purpose of the proposed Project is to upgrade the bridges to current design standards and does not include improvements that would increase the vehicle capacity of the roadway. Bridge replacement projects generally cause minimal or no increase in operational GHG emissions. Because the Project would not increase the number of travel lanes on Railroad Avenue, no increase in vehicle miles traveled (VMT) would occur as result of Project implementation.

While some GHG emissions during the construction period would be unavoidable, no increase in operational GHG emissions is expected.

b) No Impact. The County of Riverside CAP and the Western Riverside Council of Governments (WRCOG) Subregional CAP identifies policies to reduce GHG emissions. The goal of the CAPs is to promote healthier communities, reduce emissions, improve air quality and protect natural systems. As discussed above, the Project is not anticipated to generate a substantial amount of construction emissions or increase operational GHG emissions. The Project would not conflict with the County's CAP, WRCOGs CAP, the SCAQMD AQMP or any State or regional policy identified within the referenced documents related to GHG emissions.

The County of Riverside CAP identifies policies to reduce GHG emissions including federal, state, and local strategies. As discussed above, the Project is not anticipated to generate a substantial amount of construction emissions or increase operational GHG emissions. The Project is consistent with all federal and state requirements identified in the Riverside County CAP including the 2007 Clean Air Act, California Air Resources Board Standards and Programs, as well as Executive Orders S-3-05 and B-30-15. In addition to policies found in the County's CAP, Riverside County identifies General Plan policies that help reduce GHG emissions. For example, the Air Quality Element of the General Plan includes GHG reduction policies that align with goals and policies identified in the County's CAP. The Project would implement, comply and remain consistent with the following policies found in the County of Riverside General Plan Air Quality Element:

- **AQ-4.7:** To the greatest extent possible, require every project to mitigate any of its anticipated emissions which exceed allowable emissions as established by the SCAQMD, MDAQMD, SCAB, U.S. EPA, and CARB.
- **AQ 4.8:** Expand, as appropriate, measures contained in the County's Fugitive Dust Reduction Program for the Coachella Valley to the entire County.
- **AQ 4.9:** Require compliance with SCAQMD Rules 403 and 403.1 and support appropriate future measures to reduce fugitive dust emanating from construction sites.

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the minimization measures identified below, the Project will have a less than significant impact on greenhouse gas emissions.

GHG-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions will be controlled by regular watering, or other dust preventive measures using the following procedures as specified in the South Coast Air Quality Management District Rules and Regulations:

- Onsite vehicle speed will be limited to 25 miles per hour;
- During clearing, grading, earthmoving, or excavation operations, areas being excavated or graded will be sufficiently watered to prevent excessive amounts of dust. Watering should occur at least twice daily with complete coverage preferable in the late morning and after work is done for the day;
- All soil material transported onsite or offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust;
- Areas disturbed by clearing, grading, earth moving, or excavation activities will be minimized to prevent excessive dust;
- Visible dust beyond the construction limits emanating from the Project will be prevented to the maximum extent feasible.

GHG-2: Ozone precursor emissions from construction vehicles will be controlled by maintaining equipment engines in good condition, and properly tuned per manufacturer's specifications, to the satisfaction of the resident engineer.

GHG-3: All trucks that are to haul excavated or graded material offsite will comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.

3.9 Hazards and Hazardous Materials

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Source(s): Information in this section is based on the *Initial Site Assessment* (September 2019), and *Supplemental Initial Site Assessment* (June 2022).

Regulatory Setting:

Hazardous materials, including hazardous substances and wastes, are regulated by many state and federal laws. Statutes govern the generation, treatment, storage and disposal of hazardous materials, substances, and waste, and the investigation and mitigation of waste releases, air and water quality, human health and land use.

California Department of Toxic Substances Control (DTSC)

The DTSC is a sub-department under the California Environmental Protection Agency and manages the federal hazardous waste program within the State. The DTSC protects Californians

and their environment from exposure to hazardous waste by enforcing hazardous waste laws and regulations. The department takes enforcement action against violators; oversees cleanup of hazardous wastes on contaminated properties; makes decisions on permit applications from companies that want to store, treat, or dispose of hazardous waste; and protects consumers against toxic ingredients in everyday products.

California law also addresses specific handling, storage, transportation, disposal, treatment, reduction, cleanup and emergency planning of hazardous waste. The Porter-Cologne Water Quality Control Act also restricts disposal of wastes and requires clean-up of wastes that are below hazardous waste concentrations but could affect ground and surface water quality. California regulations that address waste management and contamination prevention and clean up include Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, Title 23 Waters, and Title 27 Environmental Protection.

Environmental Setting:

An Initial Site Assessment was prepared for the Project to review, evaluate, and document present and past land uses and practices. It provides preliminary identification of potentially hazardous waste that may be encountered during construction, and visually examines site conditions to identify Recognized Environmental Conditions (RECs). A REC is defined as the presence or likely presence of any hazardous substances or petroleum hydrocarbons on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum hydrocarbons into structures or into the ground, groundwater, or surface water of the subject property.

On April 30, 2019, and May 9, 2022, a site reconnaissance was conducted of the Project area. The site reconnaissance consisted of observing and documenting the existing site conditions of the Project area. Each bridge was observed by foot, including the eastern and western proposed roadway improvements, south-adjacent temporary construction easements, and staging areas. During the site reconnaissance, the following notable observations were made:

- The proposed TCE locations were observed to be in satisfactory condition and consisted of vacant, unpaved land occupied by miscellaneous debris, including wood, concrete, plastic, rusted metal, and abandoned tires that were scattered throughout each bridge location.
- A spill onto exposed soil was observed approximately 350 feet east of the bridge over Fornat Wash, next to the proposed roadway improvements. The spill was approximately three feet by one foot in size. The origin of the spill was unable to be ascertained by inspecting the immediate area surrounding the spill. The spill is not considered a significant environmental concern or potentially hazardous waste impact to the Project and is considered *de minimis*.
- Steel and concrete pillars were observed approximately 350 feet east of the bridge next to the proposed roadway improvements.
- Yellow striping was observed within the Project area along Railroad Avenue.

No evidence of storage tanks, drums, hazardous substances or petroleum products, unidentified substance containers, odors, pools of liquid, or any other potential environmental concerns were

observed within the Project limits or adjacent to the Project limits. No RECs were observed during the site visit.

Impact Analysis:

a) and b) Less than Significant Impact. Although the Initial Site Assessments revealed no evidence of RECs within or adjacent to the Project area, there are several potential impacts relating to hazardous building materials which may be encountered during demolition and construction. The following potential impacts may warrant further investigation and/or implementation of special provisions prior to or during Project Construction:

- The two subject bridges have the potential to contain hazardous building materials, including asbestos-containing materials (ACM) and lead-based paint (LBP). ACMs and LBPs are commonly encountered on bridges. Asbestos was used in many building materials prior to 1978 but may have been used into the early 1980s. ACMs include fireproofing, acoustic ceiling material, transite pipe, roofing materials, thermal insulation, gaskets, sealants, and other building materials. It is of primary concern when it is friable (that is, material that can be easily crumbled). During demolition, if not properly identified and mitigated, asbestos fibers could become airborne. Therefore, a survey for hazardous materials, including ACM and LBP, will be conducted for structures requiring removal during final design and prior to the start of construction (avoidance measure **HAZ-1**). Additionally, should such materials be encountered, Caltrans Standard Specifications 14-11 Hazardous Waste and Contamination and Caltrans' BMP WM-6 Hazardous Waste Management for the handling, transport, and disposal of such materials would be implemented by the construction contractor.
- Yellow striping exists along portions of Railroad Avenue, and it is assumed that the striping contains lead and chromium. Historically, chrome yellow (containing lead-chromate) was used as the primary yellow pigment in traffic lane paints and thermoplastic striping (PTS). Given the recent phase-out of lead-chromate-containing PTS, it is generally assumed that existing yellow PTS associated with roadway markings contains lead and chromium unless there is specific knowledge that led or chromium are not present (i.e., analytical data or definitive identification of the PTS source material). A survey of yellow paint and PTS should be conducted for stripping that requires removal along Railroad Avenue (see avoidance measure **HAZ-2**).
- The Project area includes a small portion of unpaved land to the north of both bridges and adjacent to the I-10 freeway. There is a potential for aerially deposited lead (ADL) impacted soil in the Project area from deposition of historic automotive emissions during the period of leaded fuel use. A limited ADL screening survey should be conducted in areas of exposed soil within the Project disturbance limits where soil is anticipated to be excavated during Project construction (see avoidance measure **HAZ-3**).
- The Project bridges consist of creosote-treated wood. Treated wood is typically treated with preserving chemicals that protect the wood from insect attack and fungal decay during its use. During highway construction projects, treated wood waste (TWW) may be generated when posts along metal beam guard railing, three-beam barrier, piles, utility poles, or roadside signs are removed. Upon removal, the construction contractor would manage the transport, use, and disposal of TWW in accordance with the DTSC

requirements (see minimization measure **HAZ-4**). The DTSC requires that TWW either be disposed of as a hazardous waste or, if not tested, be permitted for disposal at specific non-hazardous waste landfills per CCR, Title 22, Division 4.5, Chapter 34.

The Project will implement avoidance and minimization measures **HAZ-1** to **HAZ-4** to further reduce impacts related to the transport, use, or release of hazardous materials to a less than significant impact level.

c) No Impact. The nearest school is Cabazon Elementary School, which is approximately 2.6 miles away from the Project area. Therefore, it is not anticipated that the Project would have an impact on schools related to the use or transport of hazardous materials.

d) No Impact. The Project is not located on a site included in the Cortese List (Government Code Section 65962.5).

e) No Impact. Review of the County of Riverside Airport Land Use Compatibility Plan confirmed the Project is not located within an airport land use plan. The nearest airports are the Banning Municipal Airport and Palm Springs International Airport, which are approximately 8 miles west and 14 miles south of the Project area, respectively. Therefore, the Project would not result in a safety hazard or generate excessive noise for people residing or working in the area.

f) No Impact. The Project would improve bridge conditions and would not permanently interfere with emergency response or emergency evacuation plans. Emergency personnel would have access through the construction site and all closures and detours to the public would be coordinated with law enforcement, fire protection, and emergency medical service providers per the Project's TMP (see measure **TRA-1**). Once construction is complete, the roadway would be open to through traffic and would continue to serve as a bypass frontage road for detoured traffic from I-10 with improved load carrying capacity that meets current standards.

g) Less than Significant Impact. The Project is located within a "very high/high/moderate" fire hazard severity zone, as identified by the Riverside County's General Plan Western Coachella Valley Area Plan (June 2021). Construction activities may increase the risk of fire within the Project area due to the presence and use of flammable materials such as cleaning solvents and gas-powered construction equipment. However, the construction contractor would implement minimization measure **BIO-2** to reduce wildfire risks and protect workers. Additionally, firefighting equipment (i.e., extinguishers, shovels, fire retardants) would be on-site for emergencies.

Once construction activities are complete, the Project is not anticipated to increase the risk of wildland fires because the replacement bridges would be constructed from fire-resistant (concrete) materials. The Project is not anticipated to increase the risk of loss, injury or death resulting from wildland fires; therefore, impacts would be less than significant, and no mitigation is required.

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the avoidance and minimization measures identified below, the Project will have a less than significant impact to no impacts on hazards and hazardous materials.

Avoidance measures:

HAZ-1: Asbestos-Containing Materials (ACM) and Lead-Based Paint (LBP) Surveys: A hazardous building materials survey, ACM and LBP, will be conducted for structures requiring removal during final design and prior to the start of construction. Should such materials be encountered, Caltrans Standard Specification 14-11 Hazardous Waste and Contamination and Best Management Practice WM-6 Hazardous Waste Management for the handling, transport, and disposal of hazardous building materials will be implemented by the construction contractor.

HAZ-2: Yellow Paint and Thermoplastic Striping (PTS) Surveys: A survey of yellow PTS should be conducted for striping that requires removal along portions of Railroad Avenue undergoing improvements in support of the Project. The PTS survey should be conducted during final design and prior to Project construction.

HAZ-3: Limited Aerially-Deposited Lead Screening Survey: A limited ADL screening survey should be conducted in areas of exposed soil within the Project area where soil is anticipated to be excavated during Project construction. The ADL survey should be conducted during final design and prior to Project construction.

HAZ-4: Treated Wood Waste: Upon removal, the bridges will be managed as treated wood waste (TWW) in accordance with the Department of Toxic Substances Control (DTSC) Alternative Management Standards for TWW. The nearest Class III landfill site accepting TWW is the Lamb Canyon Landfill in Beaumont, California which is approximately 21 miles from the Project area. The construction contractor, in coordination with the County, will be required to submit all applicable permits for disposing of the TWW.

TRA-1: A Traffic Control Plan (TCP). A TCP will be prepared for the Project prior to construction. The plan will include strategies and measures to avoid and minimize disruption to local access and roadways during construction. Detour routes will be identified, coordinated, and approved by the County and affected local agencies prior to the closure. Emergency providers and the California Highway Patrol will be notified in advance about all planned closures and detour routes. Upon construction completion, detour signage and traffic signal timings will be restored to preconstruction conditions.

Minimization measures:

BIO-2: Best Management Practices. The following BMPs will be implemented to reduce impacts on biological and aquatic resources.

- Dust control measures will be implemented to minimize impacts on adjacent vegetation.
- Activities that may produce sparks, including welding or grinding, will use protective gear to reduce fire risks, such as the use of shields and protective mats. Fire suppression capabilities, including extinguishers, shovels, and water tankers, will be available onsite whenever construction occurs during the fire season (as determined by the Riverside County Fire Department).
- Trash will be stored in closed containers so that it is not readily accessible to wildlife and will be removed from the construction site daily to avoid attracting wildlife to the Project area.

- Project construction will be limited to daylight hours as feasible and will minimize the use of lighting to only what is required for directional and safety purposes.
- Exotic plant species removed during construction will be properly handled to prevent sprouting or regrowth. No plant species listed in CVMSHCP Volume I, Section 4.5.5 will be used.
- Work vehicles shall be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site.
- Trucks carrying vegetation that will be removed from the Project area will be covered and disposed of in accordance with applicable laws and regulations.
- Plans for water pollution and erosion control will be developed and implemented in accordance with RWQCB requirements. The plans will describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and use of plant material for erosion control. Plans will be reviewed and approved by Caltrans prior to construction. The water pollution and erosion control plan will include the following at a minimum:
    - Ensure no fluids or sediment from construction will enter ephemeral washes.
    - Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized.
    - No erodible materials will be deposited into watercourses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks.
    - Equipment maintenance, staging, storage, and dispensing of fuel, oil, coolant, or any other toxic substances will be located on non-sensitive upland sites with minimal risks of direct drainage into watercourses. These designated areas will be clearly marked and located in such a manner as to contain runoff from entering sensitive habitat, including watercourses and ephemeral washes.
    - Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate entities, including, but not limited to, the applicable jurisdictional County, USFWS, CDFW, or RWQCB, and will be cleaned up immediately and contaminates removed to approved disposal areas.

3.10 Hydrology and Water Quality

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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 on- or off-site;	☐	☐	☐	☒
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
(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	☐	☐	☐	☒
(iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Source(s): Information in this section is based on the *Water Quality Assessment Report* (WQAR) (September 2019) and *Location Hydraulic Study and Summary Floodplain Encroachment Report* (September 2019) prepared for this Project. In addition, the following sources were also used the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, the Water Quality Control Plan for the Colorado River Basin Region (January 2019), the San Gorgonio Integrated Regional Water Management (IRWM) (May 2018) and the Coachella Valley IRWM (December 2018).

Regulatory Setting:

Federal Clean Water Act

In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to waters of the United States (WoUS) from any point source unlawful unless the discharge complies with a National Pollutant Discharge Elimination System (NPDES) permit. This act and its amendments are known today as the Clean Water Act (CWA). In the 1987

amendments, Congress directed dischargers of stormwater from municipal and industrial/construction point sources to comply with the NPDES permit program.

Porter-Cologne Water Quality Control Act

California adopted the Porter-Cologne Act in 1969, providing the legal basis for water quality regulation within California. This act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state. It predates the CWA and regulates discharges to waters of the state. Waters of the state include more than just waters of the U.S., like groundwater and surface waters not considered waters of the U.S. Additionally, it prohibits discharges of "waste" as defined, and this definition is broader than the CWA definition of "pollutant." Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements and may be required even when the discharge is already permitted or exempt under the CWA.

EPA's Construction General Permit

The CWA is a comprehensive program "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The CWA also includes the objective of attaining "water quality which provides for the protection and propagation of fish, shellfish and wildlife and recreation in and on the water." To achieve these goals, the CWA requires EPA to control discharges of pollutants from point sources through the issuance of NPDES permits. The Water Quality Act of 1987 added section 402(p) to the CWA, which directed EPA to develop a phased approach to regulate stormwater discharges under the NPDES program.

The EPA issues the NPDES general permit for stormwater discharges from construction activities to waters of the United States. EPA issues this permit for eligible operators in all areas of the country where EPA is the NPDES permitting authority. In California, EPA is the NPDES permitting authority for tribal lands, given the nature of this Project's extension into tribal lands, specifically, Morongo Band of Mission Indians, an EPA Construction General Permit will need to be issued for this Project.

California Construction General Permit

The State Water Resources Control Board's Construction General Permit (CGP) regulates storm water discharges from construction sites that result in a Disturbed Soil Area of one acre or greater, and/or are smaller sites that are part of a larger common plan of development. By law, all storm water discharges associated with construction activity where clearing, grading, and excavation result in soil disturbance of at least one acre must comply with the provisions of the CGP. Construction activity that results in soil disturbances of less than one acre is subject to this CGP if there is potential for significant water quality impairment resulting from the activity as determined by the RWQCB. Operators of regulated construction sites are required to develop SWPPPs; to implement sediment, erosion, and pollution prevention control measures or BMPs; and to obtain coverage under the CGP.

Environmental Setting:

The Project is in the Whitewater River Watershed which encompasses terrain from parts of the San Bernardino and Little San Bernardino Mountains, San Jacinto Mountains, and the Santa Rosa Mountains. Water flow and stormwater runoff carried within the watershed would

primarily infiltrate below the surface through the porous desert floor, providing ground water recharge of the Coachella Valley Aquifer. When the region experiences heavy precipitation, high flow descends from the drainage basins and is ultimately conveyed southeast along Whitewater River as the final path before flow terminates at the Salton Sea.

The Whitewater River Watershed covers roughly 1,950 square miles and is further subdivided into many sub-watersheds. The Project is in the San Gorgonio Pass Subbasin. This subbasin covers approximately 38,650 acres (60 square miles) in Riverside County and is bounded by the San Bernardino Mountains to the north and by the San Jacinto Mountains to the south. According to the Coachella Valley Groundwater Basin, San Gorgonio Pass Sub Basin Bulletin 118 there are no known sources of impairments, and the groundwater is used primarily for municipal/irrigation and domestic use.

The Project is in a transition area between the San Gorgonio Pass on the west and the Coachella Valley on the East. Fornat Wash is located within the semi-arid region of the San Gorgonio Pass. The Project area experiences approximately 16.5 inches of rainfall per year on average. Both Fornat Wash and East Channel Stubbe Wash are dry most of the year and any runoff would either be evaporated or infiltrated into the porous ground.

Impact Analysis:

a) Less than Significant Impact. Project related construction activities that have the potential to affect water quality may include vegetation clearing, bridge demolition, generation of debris, and grading. In addition, raw materials used during construction, such as concrete, asphalt, mortar, and slurry, may contain potential pollutants, which, if uncontrolled, could lead to water quality issues, including sediment runoff, non-stormwater discharges, and potentially degradation of downstream receiving waters, groundwater, and/or ecosystems.

Construction related impacts to water quality would be addressed by implementing a SWPPP developed in accordance with the requirements of the California NPDES Construction General Permit (CGP). Additionally, the proposed eastern roadway improvements and construction staging areas at Fornat Wash would occur within the Morongo Band of Mission Indians Reservation. Given the nature of the Project's extension into Tribal Lands, coverage under the EPA's CGP in addition to coverage under the CA CGP (see avoidance measure **WQ-1**) would be required during construction. As part of gaining coverage under the EPS CGP, the Project would have an EPA SWPPP prepared for construction activities on Tribal lands. The CA CGP and EPA CGP SWPPPs would include, but are not limited to, best management practices, waste management, hazardous waste management, non-stormwater discharge management, spill prevention and clean up procedures, erosion control, sediment control, training, inspections, and monitoring during construction.

If a temporary earthen access ramp is used to access the channel bottoms, the construction contractor would implement erosion and sediment control BMPs around the earthen ramp during dry weather low flows and predicted rain events. If a heavy rain event is forecast, the construction contractor would divert the flows around the earthen ramp using run-on control BMPs, such as CASQA BMP NS-5 Clear Water Diversion, and erosion control BMPs on disturbed slope areas within the ditches. These BMPs would be outlined in the Project SWPPPs and would reduce or eliminate erosion from the earthen ramp from potentially causing adverse water quality impacts.

The use of heavy construction equipment may cause soil compaction and reduce the infiltration capacity of soils, which increases the potential for runoff and erosion. To avoid or minimize storm water runoff impacts caused by compaction of soils and redevelopment of the site, site design (SD) and source control (SC) BMPs would be implemented**.** Non-structural SC BMPs, such as employee training and litter control (see measures **WQ-2** and **WQ-3**), would be incorporated and maintained throughout the operational life of the Project using a regular maintenance program implemented by the County. Structural SC BMPs are any structural facility designed and constructed to mitigate impacts of storm water runoff pollution (i.e., slope and channel protection) (see minimization measure **WQ-4**). SD BMPs are used to directly reduce and control post-development runoff which is often accomplished by minimizing impervious areas to reduce the transport mechanism for moving pollutants off site (see minimization measure **WQ-5**). Additional SD and SC BMPs may include administrative actions, prohibition of practices, maintenance procedures, design of a structural facility, usage of alternative materials, and operation, maintenance, inspections, and compliance of an area.

b) No Impact. During final design, **WQ-5** would be incorporated to ensure impervious areas are minimized to the greatest extent possible. Additionally, post-construction, minimization measure **BIO-1** would be implemented to ensure all temporary construction areas would be returned to preconstruction conditions, including soils decompaction. Once construction is complete, the Project would not significantly increase the amount of impermeable surface areas in a way that would substantially inhibit infiltration and recharge of local aquifers.

c i) No Impact. The proposed Project has the potential to increase siltation in the ditches during construction. However, BMPs identified in the SWPPP would be implemented and regularly maintained during each phase of construction to prevent soil erosion, waste discharge, and streambank erosion, and to control sediment from disturbed areas and the earthen access ramp from reaching flowing portions of the ditches. Once construction is completed, the bridge replacements are not expected to increase or contribute erosion or siltation to the ditches.

c ii, iii) No Impact. The Project proposes to lengthen both bridges by one foot with the width remaining the same. The difference in increased impervious area is essentially nonexistent because the existing roadway is already impervious. A one-foot change in bridge length is not expected to change the hydrology of the Project area and of the surrounding watersheds associated with the Project. Therefore, flows would continue to the San Gorgonio River without any anticipated negative impacts. To further minimize potential impacts, measure **WQ-5** would be incorporated in final design to ensure impervious areas are minimized to the greatest extent possible.

c iv) No Impact. During construction, the stream course would be diverted around the current phase of bridge construction to prevent potential stormwater or ephemeral flows from encountering the construction activities and storage areas. Once construction is complete, the existing drainage pattern would be retained. Flows would be managed in a manner similar to the existing conditions upstream and downstream of the current flow crossing.

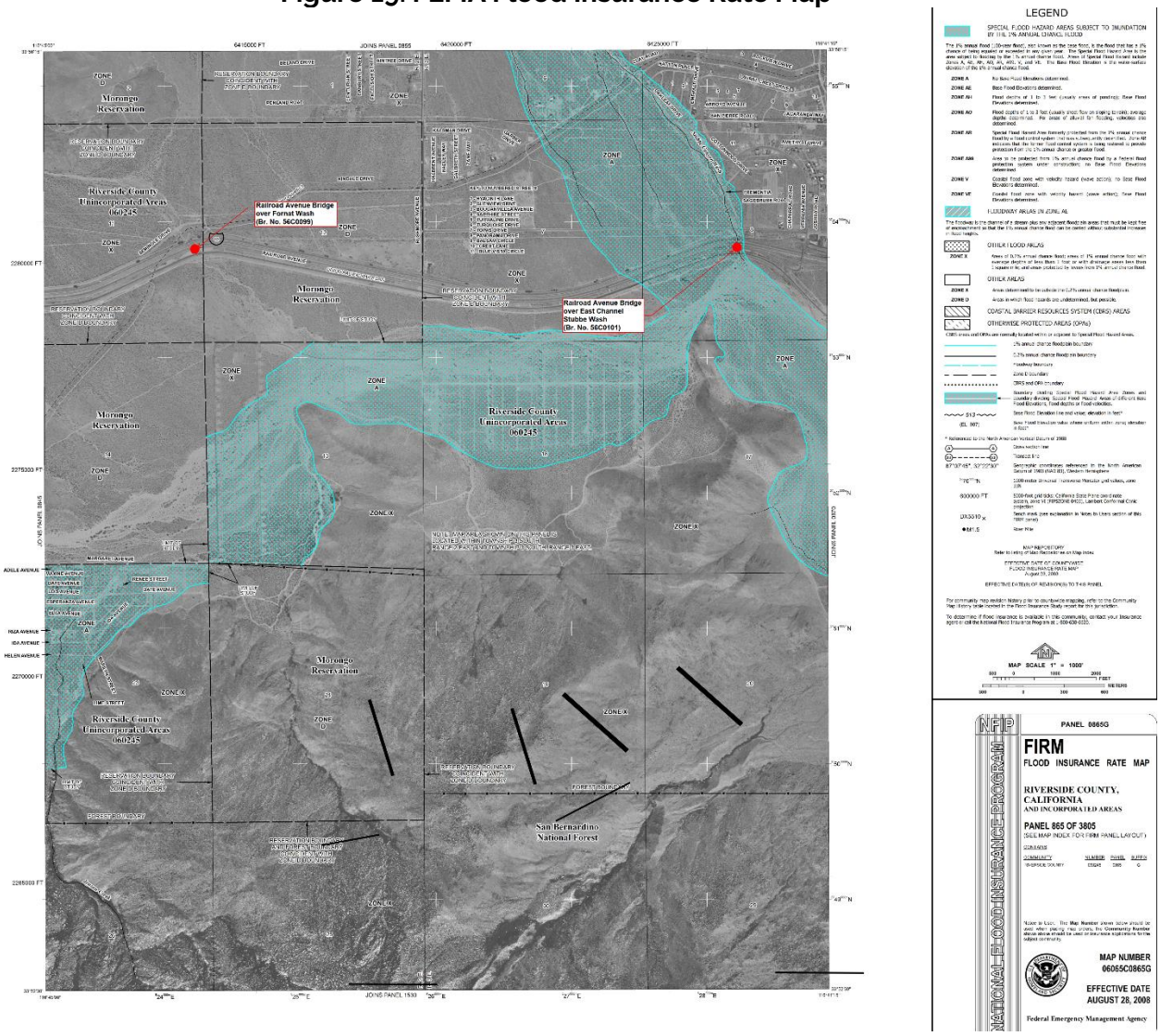
d) Less than Significant Impact. The Project is located approximately 70 miles away from the Pacific Ocean and therefore, has no tsunami risk. A seiche is an oscillation in the water level of a lake or partially enclosed body of water, especially one caused by changes in atmospheric pressure or winds. The nearest large body of water to the Project is Diamond Valley Lake,

approximately 23 miles away; therefore, the risk of inundation from a seiche is unlikely. The Project is within the following Flood Hazard Zones (see **Figure**):

Zone "X": The Fornat Wash Bridge is within a designated Zone "X" (unshaded), which means the area is outside the 0.2% annual chance floodplain. Zone X is an area determined to be outside the 500-year flood and protected by a levee from 100-year flood. Therefore, the Fornat Wash Bridge does not encroach into any defined floodplains or floodways.

Zone "A": The East Channel Stubbe Wash Bridge is within a designated Special Flood Hazard Zone "A" known as the Stubbe Canyon Wash, which means that the area is subject to the 1% annual chance floodplain, with no known base flood elevations. Therefore, the East Stubbe Channel Wash Bridge encroaches into the 1% annual chance flood hazard zone as shown on **Figure**, and thus, is subject to inundation by the 100-year flood event.

Figure 19. FEMA Flood Insurance Rate Map



During construction, BMPs outlined in the SWPPP would be implemented for the proper management, storage, and removal of construction materials, solid wastes, and hazardous substances. Staging areas would be at least 50 feet from any drainage ditch and the maintenance or refueling of equipment would not take place within the drainage ditches. Additionally, preventative practices would be used for the maintenance of construction equipment and vehicles, and personnel properly trained in spill prevention and clean up procedures would be onsite throughout the duration of construction. Jointly these controls would be used to prevent the introduction of construction pollutants into the ditches during a flood event. Additionally, the channel cross sections would be improved over the existing condition as the modern bridges would require fewer piles within the channels. The new bridges would also increase the channel capacity by providing a wider cross section that is consistent with the existing channels. The new bridges would be designed to withstand flood events and continue to provide flood control capabilities.

e) No Impact. The Project is located within the Water Quality Control Plan (Basin Plan) for the Colorado River Basin Region (January 2019), as well as the San Gorgonio Integrated Regional Water Management (IRWM) region (May 2018) and Coachella Valley IRWM region (December 2018). The goal of the Basin Plan is to preserve and enhance water quality in the Colorado River Basin Region and to protect the beneficial uses of all regional waters for the benefit of present and future generations. Similarly, the objective of the IRWM is to provide a pathway for agencies and stakeholders to collaboratively identify and implement water management solutions that provide multiple integrated benefits to the stakeholders and communities within the region. The Project would be consistent with the Basin Plan and IRWM objectives because the Project, in accordance with requirements of the California NPDES CGP and U.S. EPA CGP (see standard measure **WQ-1**), would develop and implement a SWPPP to manage and control potential contaminants from entering stormwater flows during construction. Post-construction measures (see measures **WQ-2** through **WQ-5**) would be implemented to further protect the quality of surface water, receiving water, and ground water from the completed Project through its operational life.

Avoidance, Minimization, and/or Mitigation Measures:

The following avoidance and minimization measures will be implemented to further reduce the impact of the Project.

Avoidance measures:

WQ-1: Stormwater Pollution Prevention Plan (SWPPP). A California Construction General Permit SWPPP and an EPA Construction General Permit SWPPP for portions of the Project area occurring on Tribal Lands will be developed and implemented prior to construction.

WQ-2: Employee Training. Employee Training BMP will be in accordance with CASQA Municipal BMP SC-70 Road and Street Maintenance and County of Riverside Maintenance Requirements and Frequencies.

Minimization measures:

WQ-3: Litter Control. Litter Control BMP will be in accordance with CASQA Municipal BMP SC-70 Road and Street Maintenance and County of Riverside Maintenance Requirements and Frequencies.

WQ-4: Slope and Channel Protection. Slope and Channel Protection BMP will be in accordance with CASQA New Development and Re-development BMP SD-10 Site Design and Landscape Planning or the equivalent County of Riverside Standard.

WQ-5: Minimization of Impervious Areas. Minimization of Impervious Areas BMP will be in accordance with CASQA New Development and Redevelopment BMP SD-10 Site Design and Landscape Planning or the equivalent County of Riverside Standard.

BIO-1: Temporary Construction Areas. Post-construction, all temporary construction areas and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix. Ephemeral washes and their banks will be left with an earthen, sandy bottom. No riprap or other obstructive material will be placed under the new bridges.

3.11 Land Use and Planning

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Source(s): Riverside County General Plan, Riverside County General Plan Land Use Element, Riverside County Desert Center Area Plan.

Regulatory Setting:

California Government Code sections 65000-66037

The California Government Code delegates most of the State's local land use and development decisions to cities and counties. Additionally, it establishes specific requirements pertaining to the regulation of land uses by local governments, including general plan requirements, specific plans, subdivisions, and zoning.

Pursuant to the CEQA Guidelines, a project's impact related to land use planning is evaluated in terms of compatibility with existing land uses and consistency with local plans and other local land use controls (i.e., general plans, zoning codes, specific plans, etc.).

Environmental Setting:

The County of Riverside General Plan Land Use Element identifies the area around Fornat Wash Bridge as Rural Residential and the area around East Channel Stubbe Wash Bridge as Open Space Rural. The Project is located between the communities of Cabazon and Whitewater in eastern Riverside County. Cabazon, the closest community to Fornat Wash bridge, is approximately 2-miles away. The closest community to East Channel Stubbe Wash Bridge is the I-10 Haugen Lehmann Avenue neighborhood, which is approximately 0.3-miles northeast of the bridge. The I-10 freeway divides the I-10 Haugen Lehmann Avenue neighborhood from the Project with the community located north of the freeway and the Project area south of the freeway.

Impact Analysis:

a) No Impact. Railroad Avenue is an existing frontage road that supports local access as well as diverted freeway traffic during emergency events. The proposed Project would replace the existing structurally deficient bridges with modern bridges to maintain the roadway as a frontage road. The road currently does not divide an established community and would not divide any community post-construction.

b) No Impact. The Project is within two Riverside County General Plan subplans: Fornat Wash is in the Pass Area Plan (PAP) and East Channel Stubbe Wash Bridge is in the Western Coachella Valley Area Plan (WCVAP). The Project is consistent with both the PAP and the WCVAP goals of maintaining the predominantly desert and mountainous setting, while preserving significant natural open space features in rural open space areas, a goal reiterated in the County of Riverside General Plan Land Use Element. The proposed Project would maintain the existing roadway and rural, open space setting by replacing the existing bridges with new, structurally sound concrete bridges.

In addition, the proposed Project occurs within the boundaries of the CVMSHCP in the Cabazon Conservation Area and the Snow Creek/Windy Point Conservation Areas. As described in Section 3.4 of this document, the Project would implement avoidance and minimization measures **BIO-2**, **BIO-5** through **BIO-7** to ensure full consistency with the CVMSHCP. Portions of the Project are not covered by the CVMSHCP but are within the Morongo Band of Mission Indians reservation lands. Coordination with the tribe concluded that there are no land use plans in place that the Project would need to comply with.

Avoidance, Minimization, and/or Mitigation Measures:

The Project would implement the following avoidance and minimization measures to reduce potential impacts on hydrology and water quality and ensure full consistency with the CVMSHCP.

Avoidance measures:

BIO-5: Desert Tortoise Clearance. Immediately prior to the start of Project activities and after any pause in Project activities, a qualified biologist shall conduct clearance surveys for desert tortoise as described in Chapter 6 of the USFWS 2009 Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii*); https://www.fws.gov/sites/default/files/documents/Desert-Tortoise-Field-Manual.pdf

Clearance surveys require 100 percent coverage of the Project area, with a focus on locating all desert tortoises above and below ground within the Project area immediately prior to surface disturbance or following construction of a desert tortoise-proof fence or similar barrier encompassing the Project area.

- Clearance surveys must consist of at least 2 consecutive passes of the site and involve walking transects equal to or less than 15-feet (5-meters) wide under typical conditions. Clearance surveys should be conducted when desert tortoises are most active (April through May or September through October). If desert tortoises are found during the second pass, a third pass may be required by the USFWS or CDFW.
- If desert tortoise exclusion fence is installed, the fencing should be checked several times a day to ensure that a tortoise has not been trapped within the fence.
- Any person that handles desert tortoises during clearance surveys must have appropriate authorizations from USFWS and CDFW.
- If desert tortoise are observed during the survey, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures.
- The area cleared and the number of desert tortoises found within that area must be reported to the local USFWS and CDFW prior to the start of construction.

Desert tortoise clearance surveys cannot be combined with surveys for any other species.

BIO-6: Worker Environmental Awareness Program Training. A Worker Environmental Awareness Program (WEAP) will be developed and presented to all construction personnel prior to the start of construction activities. The WEAP training will be presented by a qualified biologist. The biologist will describe the work limits in which the Project must be accomplished. The training will include general behavior and ecology for species of concern (i.e., desert tortoise and migratory birds), identification of the species, reporting requirements, and protection measures being implemented for the Project, which may include but not be limited to:

- Project personnel will not be allowed to bring pets into the Project construction site.
- No hazards to the desert tortoise (e.g., auger holes, trenches, pits, or other steep-sided depressions) will be left unfenced or uncovered; such hazards will be eliminated prior to the construction crew and the biologist(s) leaving the Project construction site for the day.
- During construction-related activities for the Project, motor vehicles will be limited to approved designated roadways and areas identified as permanently or temporarily affected by construction of the Project. All motor vehicles driving on approved nonpaved roads in the Project area will not exceed 20 miles per hour.

- Anyone who operates a motor vehicle or construction equipment will check under the parked vehicles/equipment for the presence of desert tortoises before vehicle/equipment is moved.
- Should any desert tortoise be injured or killed, all activities will be halted within 500 feet of the incident, and the Field Contact Representative (FCR) and/or Approved Biologist immediately contacted. The FCR and/or Approved Biologist will be responsible for reporting the incident to the USFWS and CDFW.

BIO-7: Burrowing Owl Avoidance. A preconstruction burrowing owl survey will be performed within 500 feet of the Project construction areas and any staging areas at least 14 days prior to the initiation of ground disturbance activities and within 24 hours prior to ground disturbance in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version). The survey will be performed by a biologist experienced performing surveys for burrowing owl and species identification. All burrows within the survey area will be examined to determine occupancy by burrowing owl. If the burrow is occupied, the qualified biologist shall coordinate with CDFW and USFWS to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be approved by CDFW and USFWS prior to commencing Project activities within the recommended restricted setback distances as specified in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version) of the occupied burrow.

If burrowing owls were to occur and impacts on occupied burrowing owl habitat or burrows cannot be avoided, a Burrowing Owl Plan will be prepared. The Plan will describe the minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure will only be considered as a last resort. The Project proponent will implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

Minimization measures:

BIO-2: Best Management Practices. The following BMPs will be implemented to reduce impacts on biological and aquatic resources.

- Dust control measures will be implemented to minimize impacts on adjacent vegetation.
- Activities that may produce sparks, including welding or grinding, will use protective gear to reduce fire risks, such as the use of shields and protective mats. Fire suppression capabilities, including extinguishers, shovels, and water tankers, will be available onsite whenever construction occurs during the fire season (as determined by the Riverside County Fire Department).
- Trash will be stored in closed containers so that it is not readily accessible to wildlife and will be removed from the construction site daily to avoid attracting wildlife to the Project area.
- Project construction will be limited to daylight hours as feasible and will minimize the use of lighting to only what is required for directional and safety purposes.
- Exotic plant species removed during construction will be properly handled to prevent sprouting or regrowth. No plant species listed in CVMSHCP Volume I, Section 4.5.5 will be used.

- Work vehicles shall be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site.
- Trucks carrying vegetation that will be removed from the Project area will be covered and disposed of in accordance with applicable laws and regulations.
- Plans for water pollution and erosion control will be developed and implemented in accordance with RWQCB requirements. The plans will describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and use of plant material for erosion control. Plans will be reviewed and approved by Caltrans prior to construction. The water pollution and erosion control plan will include the following at a minimum:
    - Ensure no fluids or sediment from construction will enter ephemeral washes.
    - Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized.
    - No erodible materials will be deposited into watercourses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks.
    - Equipment maintenance, staging, storage, and dispensing of fuel, oil, coolant, or any other toxic substances will be located on non-sensitive upland sites with minimal risks of direct drainage into watercourses. These designated areas will be clearly marked and located in such a manner as to contain runoff from entering sensitive habitat, including watercourses and ephemeral washes.
    - Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate entities, including, but not limited to, the applicable jurisdictional County, USFWS, CDFW, or RWQCB, and will be cleaned up immediately and contaminates removed to approved disposal areas.

3.12 Mineral Resources

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Source(s): Riverside County General Plan Multipurpose Open Space Element.

Regulatory Setting:

The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted by the California Legislature to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment.

Environmental Setting:

The Riverside County General Plan's Multipurpose Open Space Element contains a section on mineral resources that identifies areas designated as Mineral Resource Zones (MRZs). The State Mining and Geology Board uses the MRZs to classify lands that contain valuable mineral deposits. The Mineral Resources Areas Map found in the referenced mineral resources section of the General Plan identifies the Project area as MRZ-3. Areas zoned MRZ-3 indicate that due to insufficient data, the presence and extent of mineral resources are unknown. Zones classified as MRZ-3 are typically heavily developed and are not likely to be evaluated for mineral resources any further.

Impact Analysis:

a) and b) No Impact. The MRZ-3 zoning indicates there may be the potential to encounter mineral resources at or near the Project location. The proposed Project would replace existing bridges at the same locations resulting in the same or similar condition as currently exists; therefore, the Project would not result in a loss of or impact accessibility to a locally important resource recovery site. Any potential resources located outside of the roadway ROW or other disturbed area would still be available.

Avoidance, Minimization, and/or Mitigation Measures:

No impacts have been identified; therefore, no avoidance, minimization, and/or mitigation measures are required.

3.13 Noise

Would the Project result in:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Source(s): Information in this section is based on the Federal Highway Administration's *Construction Noise Handbook* (August 2006), Riverside County Ordinance No. 847, and the Riverside County General Plan Noise Element.

Regulatory Setting:

The State of California requires each county and city to adopt a General Plan that includes a Noise Element, which is to be prepared per guidelines adopted by the Governor's Office of Planning and Research. The purpose of the Noise Element is to limit the exposure of the community to excessive noise levels. CEQA requires baseline versus build analysis to assess whether a proposed project will have a noise impact.

Environmental Setting:

Noise sensitive receptors are areas where occupants are more susceptible to the adverse effects of noise pollution. Sensitive receptors include schools, residences, libraries, hospitals, and other care facilities. Noise levels decrease as the distance from the noise source to the receiver increases. The nearest noise sensitive receptors (residences) are approximately 700-feet from the proposed construction areas and on the opposite side of I-10.

Impact Analysis:

a) Less than Significant Impact. During construction, the Project would require the use of pickup trucks, bulldozers, dump trucks, and pile drivers. As identified in the Federal Highway Administration's *Construction Noise Handbook* (August 2006), construction equipment noise levels at their peak may range from 75 (pickup truck) to 101 (pile driver) dBA Lmax (maximum sound level) at 50 feet from the noise source. Beyond 50 feet the sound level decreases at a rate of about 6 decibels for every doubling of distance. Because there are no noise sensitive receptors within close proximity to the proposed Project, the effects of construction noise are expected to be less than significant. Additionally, noise generated during construction would be temporary and intermittent and would cease upon Project completion.

The Project does not propose to increase the capacity of Railroad Avenue and therefore, during operations the Project would not permanently increase ambient noise levels beyond the Riverside County General Plan Noise Element standards for Rural Open Space land uses (45 dBA). In addition, per the County's Ordinance No.847, capital improvement projects of a governmental agency are exempt from noise regulation.

b) Less than Significant Impact. Construction of the new bridges would require the use of pile drivers as well as heavy earthmoving equipment. Ground borne vibration and ground borne noise levels would be temporary, intermittent, and short in duration. The nearest residential structure is approximately 700-feet from proposed construction areas and on the opposite side of I-10. Due to distance from construction activities and location on the other side of I-10 (a consistent noise source), construction activities are not expected to cause excessive ground borne vibration or ground born noise levels that would be noticeable to the local community.

c) No Impact. The nearest airports are the Banning Municipal Airport and Palm Springs International Airport, which are approximately 8-miles west and 14-miles south of the Project area, respectively. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels.

Avoidance, Minimization, and/or Mitigation Measures:

No impacts have been identified; therefore, no avoidance, minimization, and/or mitigation measures are required.

3.14 Population and Housing

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Source(s): Information in this section is based on the Riverside County Land Use Element.

Regulatory Setting:

CEQA requires the analysis of a project's potential to induce growth. The CEQA guidelines (Section 15126.2[e]) require that environmental documents "…discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment…"

Environmental Setting:

Population growth projections developed for the Southern California Association of Government's (SCAG's) 2016–2040 Regional Transportation Plan/Sustainable Communities

Strategy (RTP/SCS) indicate that the population of Riverside County is expected to increase from 2,316,000 to 3,183,000 between 2015 and 2040, which is a 37.4-percent increase (SCAG 2016). From 2006 to 2016, Riverside County had the largest share of population growth among the six counties in the SCAG region. The County added an additional 360,000 new residents (nearly 40 percent of the region's increase in population).

The nearest community to the Project area is the I-10 Haugen Lehmann Avenue neighborhood, which is approximately 700-feet northeast of East Channel Stubbe Wash. The land use designation at the bridge over Fornat wash includes Rural Desert, Rural Residential, Tribal Lands. The land use designation at the bridge over East Channel Stubbe Wash is Open Space Rural. These land use designations do not allow for expansive development within its boundaries.

Impact Analysis:

a) No Impact. The proposed bridge replacements would allow the existing roadway to be used as a temporary bypass road for freeway traffic during emergency or maintenance closures. Railroad Avenue is currently load restricted and therefore, is not capable of handling all bypassed freeway traffic. By replacing the existing structurally deficient timber bridges with new modern bridges the roadway would meet current design standards and vehicle loads. Furthermore, the Project does not propose to increase the capacity of Railroad Avenue to accommodate additional vehicle volumes particularly as the demand does not warrant the additional capacity. The proposed Project is limited to the bridge replacement and as such would not induce population growth. Therefore, no impact would occur, and no mitigation is required.

b) No Impact. The proposed Project would be constructed within the existing ROW except for a temporary construction easement from the UPRR to access the channel bottoms. No permanent property acquisitions would be required. The Project would not displace people, any existing housing, or necessitate the construction of replacement housing anywhere.

Avoidance, Minimization, and/or Mitigation Measures:

No impacts have been identified; therefore, no avoidance, minimization, and/or mitigation measures are required.

3.15 Public Services

	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Source(s): Information in this section is based on the Riverside General Plan Circulation Element.

Regulatory Setting:

The CEQA guidelines (Section 15126.2[e]) require that environmental documents "…discuss the ways in which the proposed project could foster economic or population growth, or… tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects…"

Environmental Setting:

Fire protection and emergency services are provided by the Riverside County Fire Department. There are 210 firefighters serving the 81.4 square-mile Riverside County and the nearest fire station is approximately three miles away from the bridge over Fornat Wash. Police protection services in the Project area are provided by the Riverside County Sheriff's Department. The Riverside County Sheriff's Department serves the County through ten Sheriff Stations spread across the County. The nearest Sheriff's Station is approximately three miles away from the bridge over Fornat Wash.

The nearest school is approximately six miles away from the bridge over Fornat Wash. The closest recreational facility is the PCT, which crosses underneath the bridge at East Channel Stubbe Wash.

Impact Analysis:

a) No Impact. The Project proposes to replace existing structurally deficient bridge structures with new modern bridges to allow the continued use of the roadway as a local access road and

periodic bypass for highway traffic during emergency or maintenance closures. The proposed Project does not include new or proposes to alter government facilities and as such would not impact existing service ratios, response times or other performance objectives.

During construction, emergency personnel would continue to have access through the Project site. A TCP would be prepared and implemented to inform emergency response providers of planned construction activities to minimize any effects on response times. Potential closures or reroutes would be coordinated with law enforcement, fire protection, and emergency medical service providers per the Project's TCP (see measure **TRA-1**). Once construction is completed, the roadway would be open to all traffic and would continue to be used to detour traffic and emergency vehicles when the I-10 is closed.

Avoidance, Minimization, and/or Mitigation Measures:

To address potential impacts to emergency service response times as a result of temporary roadway detours or closures, the following avoidance measure would be implemented as part of the Project.

TRA-1: Traffic Control Plan (TMP). A TCP will be prepared for the Project prior to construction. The plan will include strategies and measures to avoid and minimize disruption to local access and roadways during construction. Detour routes will be identified, coordinated, and approved by the County and affected local agencies prior to the closure. Emergency providers and the California Highway Patrol will be notified in advance about all planned closures and detour routes. Upon construction completion, detour signage and traffic signal timings will be restored to preconstruction conditions.

3.16 Recreation

	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Source(s): Information in this section is based on the *Section 4(f) De Minimis Impact Determination* (June 2022).

Regulatory Setting:

There are no State regulations related to recreational resources that are applicable to the proposed Project.

Environmental Setting:

The closest public park is the Cabazon Skatepark approximately 7-miles away from the proposed Project. Within the Project area, a portion of the PCT, approximately 373-feet, bypasses (by going underneath) the Union Pacific Railroad, Railroad Avenue, and the I-10 freeway between Cabazon (to the west) and Whitewater (to the east). In its totality, the PCT is 2,650 miles long, stretching from the town of Campo near the Mexican border at the southern terminus to Manning Park in British Colombia at the northern terminus. The portion of the trail that bypasses Railroad Avenue is part of the transition between the San Jacinto Mountains to the south into the San Bernardino Mountains to the north. A major feature of the larger PCT is that is links several travel corridors into a single route, including the Oregon Skyline Trail, Cascade Trail, John Muir Trail, Lava Crest Trail, Tahoe-Yosemite Trail, Sierra Trail, and Desert Crest Trail.

The trail segment through the Project area is simply a well traversed path along an alluvial wash with no specific built features. The trail is made up of loose, eroded rock or sediment that has been shaped by water flowing through the area during the rainy seasons. Due to the lower elevation and position under the East Channel Stubbe Wash bridge, hikers often use this segment of the trail as a resting spot to escape from the desert heat.

Impact Analysis:

a) No Impact. The Project would require two temporary closures of the PCT and detour of trail users during portions of construction involving removal of the East Channel Stubbe Wash bridge, excavation of abutment foundations, pile driving, and erection of precast girders. Closure of the trail would reduce the potential for trail users to be exposed to possible falling debris and heavy dust during construction. Each closure would last up to 10 days. The construction contractor would provide the United States Forest Service (USFS), the Bureau of Land Management (BLM), and the Pacific Crest Trail Association (PCTA) with a schedule of work, schedule of closures, and detour plans for periods of closure 90 days in advance of closure to provide 30 days' notice to trail users (see avoidance measure **REC-1**). Additionally, the closures would be signed, and detour information provided at Tamarack Road and south of the UPRR tracks to identify the alternative crossing (see minimization measure **REC-2**). Furthermore, public notices would be posted to alert trail users of construction activities. If needed, flagmen, fencing, or other protective measures would be used to avoid potential conflicts between construction activities and trail users.

During trail closures, trail users would be re-routed to the West Channel Stubbe Wash where they could use the existing concrete I-10, Railroad Avenue, and UPRR underpass. The detour route was field verified and determined suitable to serve as a detour route. The vertical bridge clearance under I-10 and Railroad Avenue is 14 feet. The UPRR undercrossing has a vertical height of 9 feet and a cell width of 8 feet. Due to the limited vertical clearance of the UPRR underpass, equestrians would have to dismount and walk their horses through the undercrossing. Signs would be posted south of the UPRR undercrossing and north of the I-10 undercrossing alerting equestrians of the height restrictions at the UPRR undercrossing.

Except for the two, 10-day closures, a temporary protected crossing would be available at East Channel Stubbe Wash for the duration of construction (see minimization measure **REC-3**). The protected crossing would have a vertical height of 12 feet and a cell width of 10 feet. During construction, hikers and equestrians would have the option to use the PCT or avoid construction

noise and dust by using the West Channel Stubbe bypass. For the duration of construction, the construction contractor would be required to establish a warning mechanism (flaggers, whistles, etc.) to alert construction workers that hikers and equestrians are waiting to cross the construction site (see minimization measure **REC-4**). Once alerted, all major construction activities that could affect the comfort of hikers and equestrians would be paused until the trail users have passed through the construction site. The expected wait time for trail users to be allowed passage through the construction site would be up to 30 minutes. Once construction is completed, any incidental or unanticipated damage or disrepair to the trail that may have resulted during construction would be restored to pre-construction conditions (see minimization measure **REC-5**). Use of the West Channel Stubbe Wash as a detour route would not require restoration activities after construction as no improvements are proposed.

Project implementation is not expected to affect the trail in the long term. Aside from the two periods where the trail is closed, the PCT would be maintained in its original alignment. It is anticipated that the new bridge structure would continue to allow for passage by hikers and is anticipated to be used in a similar manner. Therefore, the proposed Project would not change the use of and would have a less than significant impact on the recreational facility.

b) No Impact. The proposed Project is a bridge replacement project that does not include recreational facilities or require the construction or expansion of recreational facilities. The Project does not include a population increasing component (i.e., construction of dwelling or commercial units) that could cause additional demand on or the need to construct or expand recreational facilities. Therefore, no impact would occur and no mitigation is required.

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the avoidance and minimization measures below, the proposed Project will have a less than significant impact on recreational resources.

Avoidance measure:

REC-1: Agency Coordination. The construction contractor will provide the United States Forest Service (USFS), the Bureau of Land Management (BLM), and the Pacific Crest Trail Association (PCTA) with a schedule of work, schedule of closures, and detour plans for periods of closure 90 days in advance of closure to provide 30 days' notice to trail users.

Minimization measures:

REC-2: Signage for Alternative Trail Route. Signs will be posted north of the I-10 undercrossing at Tamarack Road and south of the UPRR undercrossing alerting equestrians of the height restrictions at the UPRR undercrossing.

REC-3: Temporary Alternative Trail Route. During construction a protected crossing will be provided at the East Channel Stubbe Wash, with the exception of the two 10-day trail closures, as an available option for hikers and equestrians to use.

REC-4: Public Safety. During construction, the construction contractor will be required to establish a warning mechanism (flaggers, whistles, etc.) to alert construction workers that trail users are waiting to pass through the construction site.

REC-5: Restoration of Impacted Trail Segment. Once construction is complete, any incidental or unanticipated damage or disrepair to the trail that may have resulted during construction will be restored to pre-construction conditions.

3.17 Transportation

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

Source(s): Information in this section is based on the *Traffic Technical Memorandum* (April 2019), the Riverside County Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled, and the Riverside County General Plan Circulation Element.

Regulatory Setting:

Senate Bill 743

SB 743 (Steinberg, 2013) updates the way transportation impacts are measured in California for new development projects, making sure they are built in a way that allows Californians more options to drive less.

CEQA Guidelines Section 15064.3

On December 28, 2018, the State CEQA Guidelines were updated, and Section 15064.3 was added and codified. The new updates went into effect that same year. Section 15064.3 specifically provides considerations for evaluating project-related transportation impacts and notes that 'vehicle miles traveled' (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2), a project's effect on automobile delay will not constitute a significant environmental impact.

Section 15064.3 (b)(2) provides criteria for analyzing transportation project impacts. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have

already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

Western Riverside County Active Transportation Plan (ATP)

The Western Riverside Council of Governments (WRCOG) Western Riverside County Active Transportation Plan (ATP) identifies facilities to increase active transportation options in the region. Active transportation refers to non-motorized and non-pollutant modes of transportation. The goal and purpose of the ATP is to provide guidance to WRCOG and its member agencies in identifying, planning, and successfully implementing projects (Western Riverside Active Transportation Plan, June 2018). WRCOG's ATP incorporates information from the existing 21 regional area plan trail systems to inform existing conditions and planning context within the plan area, including the Riverside County Regional Park and Open-Space District Comprehensive Trails Plan, to inform existing conditions and planning context within the planning area.

Riverside County Regional Park and Open-Space District Comprehensive Trails Plan

The Riverside County Regional Park and Open-Space District Comprehensive Trails Plan (Plan) (February 2018) provides policies and design standards to promote new trails and improve existing trails. The Plan recommends a backbone trail network that closes gaps and connects major destinations in previously planned trails. The primary goals of the Plan are to set guidance and recommendations for the future design and management of regionals trails within Riverside County that would serve a variety of users. The Comprehensive Trails Plan is intended to connect smaller communities through seamless transitions from community to regionally maintained systems. This intent aligns with the goals of the ATP.

Environmental Setting:

Railroad Avenue is an approximately 5-mile stretch of road that runs parallel to I-10 and the UPRR. It connects the Haugen-Lehmann Way and I-10 at the east end and Main Street and I-10 at the west end. It mostly serves the sparsely populated Cabazon community. The ADT volume is approximately 211 vehicles. Periodically, the road carries detoured traffic from the heavily traveled I-10 when the freeway is temporarily closed for construction or emergency incidents. The road also serves as an access route for UPRR and utility maintenance crews.

Impact Analysis:

a) No Impact. The proposed bridge replacements would allow for the continued use of the road as a collector road, as well as an alternative route for I-10 traffic during temporary maintenance or emergency closures of the freeway. This is consistent with the County's General Plan Circulation Element, which identifies Railroad Avenue as a collector road. Additionally, the WRCOG ATP identifies a regional route through the San Bernardino County – I-10 Pass Area (Project Reference #8) that extends east along I-10 to the Banning/Riverside County line - approximately one mile past the bridge over Fornat Wash, but west of the bridge over East Channel Stubbe Wash. The route is proposed as a Class III facility - streets designated for bicycle travel and shared with motor vehicles. The proposed Project would provide two 12-foot-wide travel lanes in each direction and a 4-foot-wide shoulder on each side. These improvements exceed the suggested 10-foot shared use path proposed along this segment allowing for designation as a Class III facility in the future. The proposed Project is limited in scope and

intended to address the structural deficiencies and safety concerns related to the timber bridges. However, it does not preclude future development of a shared use path along the roadway. Therefore, the Project would not conflict with the County's Circulation Element, WRCOG ATP, or the County's Comprehensive Trails Plan and no mitigation is required.

b) No Impact. According to the December 2020, Riverside County Transportation Analysis Guidelines, the proposed Project can be categorized as a Non-Significant Transportation Impact Project under the rehabilitation, maintenance, replacement, safety, and repair example. This example is derived directly from the 2018 Office of Planning and Research Guidance. CEQA Guidelines Section 15064.3(b) states that transportation projects that reduce or have no impact on VMT can be presumed to have a less than significant transportation impact. The proposed Project would replace two structurally deficient wooden bridge structures with new concrete bridge structures. The existing bridge structures have exceeded their 50-year life span and are now load restricted due to deterioration and scour of the timber bridge members. Replacement of the bridges would allow for improvements to meet current vehicle loads and safety standards. The Project would not result in additional vehicle miles traveled because the Project does not increase vehicle capacity. The Project would not conflict with CEQA Guidelines section 15064.3, subdivision (b). No mitigation is required.

c) No Impact. The Project proposes to replace the existing bridges with concrete bridges of the same or similar length and width consistent with current Caltrans design standards. No changes in horizontal or vertical roadway geometry would result from the bridge replacements. No mitigation is required.

d) Less Than Significant Impact. During construction, all closures and detours would be coordinated with law enforcement, fire protection, and emergency medical service providers per the Project's TMP (see avoidance measure **TRA-1**) to ensure access for emergency vehicles through the construction site. Once construction is completed, the road would be open to all traffic and would meet current design standards for access, including for emergency vehicles.

Avoidance, Minimization, and/or Mitigation Measures:

The Project will implement the following avoidance measure:

TRA-1: Traffic Control Plan (TCP). A TCP will be prepared for the Project prior to construction. The plan will include strategies and measures to avoid and minimize disruption to local access and roadways during construction. Detour routes will be identified, coordinated, and approved by the County and affected local agencies prior to the closure. Emergency providers and the California Highway Patrol will be notified in advance about all planned closures and detour routes. Upon construction completion, detour signage and traffic signal timings will be restored to preconstruction conditions.

3.18 Tribal Cultural Resources

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:	**Significant and Unavoidable Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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	☐	☐	☐	☒
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Source(s): Information in this section is based on AB 52 consultation conducted for the Project, the *Historic Property Survey Report*, *Historical Resources Evaluation Report,* and *Archaeological Survey Report* (February 2022).

Regulatory Setting:

Effective July 1, 2015, CEQA was revised to include early consultation with California Native American tribes and consideration of tribal cultural resources (TCRs). These changes were enacted through Assembly Bill 52 (AB 52). By including TCRs early in the CEQA process, AB 52 intends to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to TCRs. CEQA now establishes that a "project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment" (PRC § 21084.2).

To help determine whether a project may have such an adverse effect, the PRC requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project (PRC § 21080.3.1). Consultation must consist of the lead agency providing formal notification, in writing, to the tribes that have requested notification or proposed projects within their traditionally and culturally affiliated area. AB 52 stipulates that the NAHC shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated within the project area. If the tribe wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification. Once the lead agency receives the tribe's request to consult, the lead agency must then begin the consultation process within 30 days. If a lead agency determines that a project may cause a substantial adverse change to TCRs, the lead agency must consider measures to mitigate that

impact. Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a TCR, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC § 21080.3.2). Under existing law, environmental documents must not include information about the locations of an archaeological site or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records act. TCRs are also exempt from disclosure. The term "tribal cultural resource" refers to sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

- Included or determined to be eligible for inclusion in the California Register of Historical Resources
- Included in a local register of historical resources as defined in subdivision (k) of California PRC Section 5020.1
- A resource determined by a California lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the PRC Section 5024.1.

Environmental Setting:

The APE was established and includes all potential areas directly or indirectly affected by the Project, all construction and staging areas, Temporary Construction Easements (TCEs) and construction signage. In total, the APE encompasses approximately 2.27 acres and includes two discontinuous segments centered around each individual bridge: Fornat Wash Bridge (Bridge No. 56C0099) and East Channel Stubbe Wash Bridge (Bridge No. 56C0101). The vertical limit of the APE extends up to 20 feet in depth to accommodate excavation associated with construction of the bridge footings.

Consultation with Native American groups occurred during the Section 106 process required under NEPA through Caltrans and during the AB 52 process required under CEQA through the County. This section discussion is focused on the consultation efforts conducted under AB 52.

TCR identification efforts were conducted to determine whether a TCR, as defined by PRC § 21074, would be impacted by the Project. These efforts included background research, a search of archaeological site records and cultural survey reports on file at the EIC, literature and map review, a review of the Sacred Lands File by the NAHC, efforts to coordinate with Native American Tribal Governments, and a pedestrian field survey.

The NAHC was contacted on February 5, 2019, to review its Sacred Lands Files (SLF), to determine if any known cultural resource information was available in the SLF. In a reply dated February 8, 2019, the NAHC stated that the SLF search for the Project was completed with negative results; however, the absence of specific site information in the SLF does not necessarily indicate the absence of cultural resources in the APE. Therefore, the County provided a list of Native American contacts within the region.

On February 23, 2022, initial AB 52 consultation letters were sent to the four Native American individuals on the AB 52 list provided by the County. Letters were sent to the following tribal representatives:

- Agua Caliente Band of Cahuilla Indians; Director/Tribal Historic Preservation Officer, Patricia Garcia-Plotkin
- Morongo Band of Mission Indians; Tribal Historic Preservation Officer, Ann Brierty
- Soboba Band of Luiseno Indians; Tribal Historic Preservation Officer, Joseph Ontiveros
- Twenty-Nine Palms Band of Mission Indians; Tribal Historic Preservation Officer, Anthony Madrigal

The letters provided a summary of the Project and requested information regarding comments or concerns the Native American community might have about the Project and whether any traditional cultural properties, TCRs, or other resources of significance would be affected by implementation of the Project. The letters also stated that if the tribes would like to consult under AB 52, they would have to respond within 30 days, pursuant to PRC 21080.3.1(d). Below is a list of the current status of all the tribal representatives contacted:

Agua Caliente Band of Cahuilla Indians; Director/Tribal Historic Preservation Officer, Patricia Garcia-Plotkin. An email response was received from Lacy Padilla, Archaeologist for the Agua Caliente Band of Cahuilla Indians on March 25, 2022. Ms. Padilla noted the Project is within the Tribe's Traditional Use Area. For this reason, the Tribe requested the following: (1) formal consultation under AB 52; (2) copies of any cultural resource documentation connected to the Project; and (3) presence of an approved Cultural Resource Monitor during any ground-disturbing activities associated with the Project. A copy of the Archaeological Survey Report prepared for the Project was sent to the tribe on March 29, 2022. On April 4, 2022, the County met with the tribe for formal consultation. Ms. Padilla noted five prehistoric trails (three trails under Fornat Wash and two trails under East Channel Stubbe Wash) within the APE, leading from the hills north of the Project to the valley south of the Project. Ms. Padilla requested the schedule for the environmental document circulation and construction schedule, as well as a copy of the environmental document. The milestone schedule for the environmental document circulation and construction schedule was provided to Ms. Padilla on May 11, 2022. On June 1, 2022, a monitoring denial letter was emailed to the tribe formally closing out AB 52 consultation.

Morongo Band of Mission Indians; Tribal Historic Preservation Officer, Ann Brierty. No response to the initial letter was received. The County sent a follow-up email on April 18, 2022 regarding the AB 52 initiation letter and closed out consultation with the Tribe.

Soboba Band of Luiseno Indians; Tribal Historic Preservation Officer, Joseph Ontiveros. No response to the initial letter was received. The County sent a follow-up email on April 18, 2022 regarding the AB 52 initiation letter and closed out consultation with the Tribe.

Twenty-Nine Palms Band of Mission Indians; Tribal Historic Preservation Officer, Anthony Madrigal. No response to the initial letter was received. The County sent a follow-up email on April 18, 2022 regarding the AB 52 initiation letter and closed out consultation with the Tribe.

Through the SLF records search and tribal consultation process, no listed or eligible for listing TCRs were identified within the APE.

Impact Analysis:

a) No Impact. As mentioned above, a records search and AB 52 tribal consultation was conducted for the Project. No TCRs were identified as a result of these efforts; therefore, the Project is not anticipated to have an impact on TCRs.

b) Less than Significant Impact. No TCRs were identified during the AB 52 consultation process or were found within the Project APE. Therefore, no impacts are expected to occur. Standard avoidance measures for inadvertent discoveries and identification of human remains would be incorporated into the Project (see measures **CR-1** and **CR-2**).

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the avoidance measures identified below, the Project would have a less than significant impact on tribal cultural resources.

CR-1: If cultural materials are discovered during construction, all earth-moving activity within 60 feet around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.

CR-2: If human remains are discovered, Health and Safety Code Section 7050.5 states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendent (MLD). At this time, the construction contractor will coordinate with the County so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

3.19 Utilities and Service Systems

Would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Source(s): Information in this section is based on information collected from the preliminary right of way and utility research completed for the proposed Project.

Regulatory Setting:

Water Conservation Act of 2009 (Senate Bill X7-7)

The Water Conservation Act of 2009 (SB X7-7) requires all water suppliers to increase water use efficiency. The urban water use goal within the state is to achieve a 20 percent reduction in per capita water use by December 31, 2020.

California Integrated Waste Management Act (AB 939)

AB 939 established the California Integrated Waste Management Board under CalRecycle, which required all counties within California to prepare integrated waste management plans. Additionally, it changed the focus of solid waste management from landfill to diversion strategies (e.g., source reduction, recycling, and composting), and required all municipalities to divert 25 percent of their solid waste from landfill disposal by January 1, 1995, and 50 percent by 2000. Later legislation mandates the 50 percent diversion requirement be achieved every year.

Environmental Setting:

Several telephone companies provide services in the Project area including AT&T/Frontier and Sprint. AT&T/Frontier's line runs on the north side of Railroad Avenue while Sprint's runs along the south side. An abandoned gas line runs along the north side of Railroad Avenue.

Impact Analysis:

a) Less than Significant Impact. Existing utilities that run along the north side of Railroad Avenue may require relocation. The construction contractor, in coordination with the County, would coordinate with the utility provider during final design for potential relocation of utilities (see minimization measure **UTIL-1**). The proposed bridge replacements would not require or result in construction of new utilities or service systems.

b) and c) No Impact. The proposed bridge replacements would not include development that requires new or expanded water supply. The intent of the Project is to ensure the roadway remains viable as a local access road and occasional bypass for I-10 traffic during periodic closures due to maintenance or emergencies.

d) and e) No Impact. The existing bridge structures consist of creosote-treated wood. Upon removal, the timber debris from the bridges would be managed as TWW in accordance with the DTSC Alternative Management Standards for TWW. The nearest Class III landfill site accepting TWW is the Lamb Canyon Landfill in Beaumont, California which is approximately 16 miles from the Project area. The expected amount of contaminated timber debris to be disposed of is estimated to be about 75,500 board feet. The construction contractor, in coordination with the County, would be required to submit all applicable permits for disposing of the TWW (see measure **HAZ-4**).

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the following minimization measures, the Project would have a less than significant impact on utilities.

UTIL-1: Potential relocation of suspended utilities will be coordinated with the local utility providers prior to construction and in coordination with the County.

HAZ-4: Upon removal, the bridges will be managed as treated wood waste (TWW) in accordance with the Department of Toxic Substances Control (DTSC) Alternative Management Standards for TWW. The nearest Class III landfill site accepting TWW is the Lamb Canyon Landfill in Beaumont, California which is approximately 21 miles from the Project area. The construction contractor, in coordination with the County, will be required to submit all applicable permits for disposing of the TWW.

3.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Source(s): Information in this section is based on CAL FIRE's Fire Hazard Severity Zones map and Riverside County General Plan Safety Element Update.

Regulatory Setting:

The California Department of Forestry and Fire Protection (CAL FIRE) is responsible for the stewardship and fire protection of over 31 million acres of California's privately owned wildlands. CAL FIRE classifies and maps wildfire hazards within State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs). LRAs are lands on which neither state nor federal government have any legal responsibility for providing fire protection. SRAs are lands in which the State of California holds financial responsibility for providing fire protection. SRAs are defined based on land ownership, population density and land use. For example, CAL FIRE does not have responsibility for densely populated areas, incorporated cities, agricultural lands, or lands administered by the federal government. Per California Public Resource Code 4201-4204, SRAs are mapped based on relevant factors such as fuels, terrain, and weather, and their potential for causing ignition to buildings.

Per California Government Code 51175-89, CAL FIRE is required to identify very high fire hazard severity zones. Fire hazards can be in SRAs or LRAs and mapping of the very high fire hazard severity zones is based on data and models of potential fuels over a 30-50-year time horizon and their associated expected fire behavior and expected burn probabilities which quantifies the likelihood and nature of vegetation fire exposure (including firebrands) to buildings.

Senate Bill 1241 requires the Office of Planning and Research, in coordination with CAL FIRE to prepare, develop, and transmit to the Secretary of the Natural Resources Agency proposed

changes or amendments to the initial study checklist for the inclusion of questions related to fire hazard impacts for projects in state responsibility areas and very high fire hazard severity zones.

Environmental Setting:

According to CAL FIRE's Fire Hazard Severity Zones online interactive map, the Project is in a state responsibility area and in a "very high/high/moderate" fire hazard severity zone.

Impact Analysis:

a) Less than Significant Impact. During construction, Railroad Avenue would remain open for emergency personnel. Additionally, a TMP (see avoidance measure **TRA-1**) would be prepared and implemented to inform emergency response providers of planned construction and detour routes. Upon Project completion, Railroad Avenue would meet current design standards for vehicle loads and would be open to all vehicle traffic including emergency vehicles.

b) Less than Significant Impact. According to CAL FIRE's Fire Hazard Severity Zones online interactive map and the Riverside County General Plan Safety Element (September 2021 Update), the Project is in a "very high/high/moderate" fire hazard severity zone. Construction equipment and machinery increase the likelihood of fire risks due to the use of gasoline and diesel. However, the construction contractor would implement minimization measure **BIO-2** to prevent the risk of wildfire. Additionally, firefighting equipment (i.e., extinguishers, shovels, fire retardants) would be on-site for emergencies.

Replacement of the timber bridge structures with new concrete structures would reduce the risk of uncontrolled wildfires by removing inherently flammable timber materials. Replacement of the bridges would not result in increased wildfire risks or pollutant concentrations beyond existing conditions and would enhance overall safety conditions in the area.

c) No Impact. The proposed bridge replacements would meet current design standards and load carrying capacity. The Project would not install any infrastructure, such as new power lines or other utilities that could exacerbate wildfire risks.

d) No Impact. The Project is within a relatively flat area and the washes are dry most of the year. Any runoff from the roadways either evaporates or infiltrates into the porous ground. The proposed Project would lengthen both bridges by about one foot with the width remaining the same. After construction, the runoff flowrate would increase nominally due to the additional impervious surface area; however, the one-foot change in bridge length is not expected to change the upstream or downstream hydrology of the washes or the Whitewater River watershed. Runoff would continue to flow to the San Gorgonio River without negative impacts.

The Project does not plan to change the hydrologic features of either wash and it would make improvements to avoid future scour problems. The existing drainage pattern would be retained and would still be able to handle the 100-, 200- and 500-year flows. Flows would be managed the same as existing conditions upstream and downstream of the current crossings. Additionally, slope stability is expected to be adequate for protecting against flooding and landslide risk is considered low. Therefore, the Project would not pose a significant risk for downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Avoidance, Minimization, and/or Mitigation Measures:

With implementation of the avoidance and minimization measures identified below, the Project would have a less than significant impact on wildfire.

Avoidance measure:

TRA-1: Traffic Control Plan (TCP). A TCP will be prepared for the Project prior to construction. The plan will include strategies and measures to avoid and minimize disruption to local access and roadways during construction. Detour routes will be identified, coordinated, and approved by the County and affected local agencies prior to the closure. Emergency providers and the California Highway Patrol will be notified in advance about all planned closures and detour routes. Upon construction completion, detour signage and traffic signal timings will be restored to preconstruction conditions.

Minimization measure:

BIO-2: Best Management Practices. The following BMPs will be implemented to reduce impacts on biological and aquatic resources.

- Dust control measures will be implemented to minimize impacts on adjacent vegetation.
- Activities that may produce sparks, including welding or grinding, will use protective gear to reduce fire risks, such as the use of shields and protective mats. Fire suppression capabilities, including extinguishers, shovels, and water tankers, will be available onsite whenever construction occurs during the fire season (as determined by the Riverside County Fire Department).
- Trash will be stored in closed containers so that it is not readily accessible to wildlife and will be removed from the construction site daily to avoid attracting wildlife to the Project area.
- Project construction will be limited to daylight hours as feasible and will minimize the use of lighting to only what is required for directional and safety purposes.
- Exotic plant species removed during construction will be properly handled to prevent sprouting or regrowth. No plant species listed in CVMSHCP Volume I, Section 4.5.5 will be used.
- Work vehicles shall be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site.
- Trucks carrying vegetation that will be removed from the Project area will be covered and disposed of in accordance with applicable laws and regulations.
- Plans for water pollution and erosion control will be developed and implemented in accordance with RWQCB requirements. The plans will describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and use of plant material for erosion control. Plans will be reviewed and approved by Caltrans prior to construction. The water pollution and erosion control plan will include the following at a minimum:
    - Ensure no fluids or sediment from construction will enter ephemeral washes.
    - Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized.

- No erodible materials will be deposited into watercourses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks.
- Equipment maintenance, staging, storage, and dispensing of fuel, oil, coolant, or any other toxic substances will be located on non-sensitive upland sites with minimal risks of direct drainage into watercourses. These designated areas will be clearly marked and located in such a manner as to contain runoff from entering sensitive habitat, including watercourses and ephemeral washes.
- Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate entities, including, but not limited to, the applicable jurisdictional County, USFWS, CDFW, or RWQCB, and will be cleaned up immediately and contaminates removed to approved disposal areas.

3.21 Mandatory Finding of Significance

	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☒	☐	☐
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)?	☐	☐	☒	☐
c) Does the Project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Impact Analysis:

a) Less than Significant Impact with Mitigation Incorporated. As described in Section 3.4 Biological Resources, the proposed Project has the potential to impact sensitive species, natural communities, and jurisdictional waters. As a result, measures **BIO-1** through **BIO-8** would be implemented as part of the Project. Inclusion of these measures would ensure that the Project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, substantially reduce the number or restrict the range of a rare or endangered plant or animal. Additionally, as described in Section 3.5 Cultural Resources and 3.18 Tribal Cultural Resources, the Project would not have adverse impacts on cultural or tribal cultural resources, as there are none within the Project APE. The Project would implement **CR-1** and **CR-2** to reduce the potential for impacts on undiscovered cultural resources. Therefore, impacts are considered less than significant with mitigation.

b) Less than Significant. All topic areas were determined to result in less than significant impacts. In addition to standard measures, avoidance, minimization, and/or mitigation measures have been identified and would be implemented to further reduce potential impacts. Therefore, the Project would not result in individual impacts that could contribute to a cumulative effect.

c) No Impact. Generally, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, hazards and hazardous materials, and noise, the proposed Project would have a less than significant impact on these resources and would implement BMPs, standard measures, and reduction measures to further reduce the Project's impacts. Therefore, the proposed Project would not result in substantial adverse effects on human beings, either directly or indirectly.

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6 List of Technical Studies (Bound Under Separate Cover)

Technical studies are available via the Project webpage except for the cultural reports, which contain confidential resource information.

- Biological Resources Technical Report
    - Natural Environmental Study (Minimal Impacts) (includes as appendix Jurisdictional Delineation Report).
- HPSR/ASR/HRER (Confidential- Not for Public Distribution)
- Initial Site Assessment and Supplemental Initial Site Assessment
- Location Hydraulic Study and Summary Floodplain Encroachment Report
- Paleontological Technical Memorandum
- Section 4(F) Evaluation
- Traffic Technical Memorandum
- Visual Impact Assessment Memorandum
- Water Quality Assessment Report

Appendix A – Mitigation Monitoring and Reporting Plan

This Mitigation Monitoring and Reporting Program has been prepared for implementing Avoidance, Minimization, and/or Mitigation measures for the Railroad Avenue Bridge Replacement Project.

The California Environmental Quality Act (CEQA) requires public agencies to prepare a mitigation and monitoring plan when adopting a mitigated negative declaration as stated in Public Resources Code Section 21081.6 (a) (1). This Public Resources Code states that "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared in compliance with the state law and includes measures that may be included as conditions of approval for the Railroad Avenue Bridge Replacement Project. The MMRP would ensure the Project's conditions of approval are being implemented properly and timely. The MMRP identifies what action(s) will be taken, who will be responsible for implementing the action(s), and when the action(s) will need to occur.

The County, as lead agency for the Project, will be responsible for compliance with the measures identified and adopted as approvals for the Project. The County will monitor and report on the implementation of all mitigation measures. The construction contractor will be responsible for implementing the measures with oversight from the County.

Mitigation Monitoring and Reporting Program						
Mitigation Measures		**Mitigation Monitoring**			**Reporting**	
Mitigation Measure	**Measure Type**	**Monitoring Schedule**	**Monitoring Responsibility**	**Monitoring Procedure**	**Comments**	**Date/ Initials**
Biological Resources						
BIO-1: Temporary Construction Areas. Post-construction, all temporary construction areas and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix. Ephemeral washes and their banks will be left with an earthen, sandy bottom. No riprap or other obstructive material will be placed under the new bridges.	Minimization	Post Construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			
BIO-2 Best Management Practices. BMPs will be implemented to reduce impacts on biological and aquatic resources. • Dust control measures will be implemented to minimize impacts on adjacent vegetation. • Activities that may produce sparks, including welding or grinding, will use protective gear to reduce fire risks, such as the use of shields and protective mats. Fire suppression capabilities, including extinguishers, shovels, and water tankers, will be available onsite whenever construction occurs during the fire season (as determined by the Riverside County Fire Department). • Trash will be stored in closed containers so that it is not readily accessible to wildlife and will be removed from the construction site daily to avoid attracting wildlife to the Project site. • Project construction will be limited to daylight hours as feasible and will minimize the use of lighting to only what is required for directional and safety purposes. • Exotic plant species removed during construction will be properly handled to prevent sprouting or regrowth. No plant species listed in CVMSHCP Volume I, Section 4.5.5 will be used. • Work vehicles shall be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site. • Trucks carrying vegetation that will be removed from the Project will be covered and disposed of in accordance with applicable laws and regulations. • Plans for water pollution and erosion control will be developed and implemented in accordance with RWQCB requirements. The plans will describe sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and use of plant material for erosion control. Plans will be reviewed and approved by Caltrans prior to construction. The water pollution and erosion control plan will include the following at a minimum: ○ Ensure no fluids or sediment from construction will enter ephemeral washes. ○ Sediment and erosion control measures will be implemented until such time soils are determined to be successfully stabilized. ○ No erodible materials will be deposited into watercourses. Brush, loose soils, or other debris material will not be stockpiled within stream channels or on adjacent banks. ○ Equipment maintenance, staging, storage, and dispensing of fuel, oil, coolant, or any other toxic substances will be located on non-sensitive upland sites with minimal risks of direct drainage into watercourses. These designated areas will be clearly marked and located in such a manner as to contain runoff from entering sensitive habitat, including watercourses and ephemeral washes. ○ Necessary precautions will be taken to prevent the release of cement or other toxic substances into surface waters. Project-related spills of hazardous materials will be reported to appropriate entities, including, but not limited to, the applicable jurisdictional County, USFWS, CDFW, and the RWQCB, and will be cleaned up immediately and contaminated soils removed to approved disposal areas.	Minimization	During Construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			
BIO-3 Biological Monitor. An Approved Biologist will monitor all construction activities during initial ground disturbance. The Approved Biologist will ensure that all practicable measures are being employed to avoid incidental disturbance of the CVMSHCP Conservation Area adjacent to the BSAs. Once initial ground clearing is completed, ongoing weekly monitoring and reporting will occur throughout the duration of construction activities to ensure BMPs in **BIO-2** are implemented.	Minimization	During Construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			

BIO-4: Compensatory Mitigation for Replacement/Restoration of Jurisdictional Waters. Permanent and temporary impacts from the replacement of Fornat Wash Bridge (#56C0099) and East Channel Stubbe Wash Bridge (#56C0101) will require compensatory mitigation for jurisdictional waters. Compensation can be a combination of enhancement, restoration, and/or rehabilitation. Compensation can occur through the option of permittee-responsible on- or off-site mitigation and will be determined in consultation with the USACE, RWQCB, and CDFW.. Temporary impacts will be restored with implementation of **BIO-1**. Permanent mitigation will occur at a minimum of 1:1 ratio during the permitting phase. Temporary impacts will be restored with implementation of **BIO-1**. However, to ensure adequate compensatory mitigation is obtained, final mitigation ratios will be determined during the permitting phase and after consultation with the USACE, RWQCB, and CDFW and would be at a minimum 1:1 ratio. Applications for permits (404, 401, 1602) will be submitted following adoption of the Final IS/MND.	Compensatory	Final Design	Project Engineer/ Resident Engineer/Construction Contractor			
BIO-5 Desert Tortoise Clearance Survey. Immediately prior to the start of Project activities and after any pause in Project activities, a qualified biologist shall conduct clearance surveys for desert tortoise as described in Chapter 6 of the USFWS 2009 Desert Tortoise (Mojave Population) Field Manual (*Gopherus agassizii*); https://www.fws.gov/sites/default/files/documents/Desert-Tortoise-Field-Manual.pdf Clearance surveys require 100 percent coverage of the Project area, with a focus on locating all desert tortoises above and below ground within the Project area immediately prior to surface disturbance or following construction of a desert tortoise-proof fence or similar barrier encompassing the Project area to ensure that tortoises cannot enter the Project area. • Clearance surveys must consist of at least 2 consecutive passes of the site and involve walking transects equal to or less than 15-feet (5-meters) wide under typical conditions. Clearance surveys should be conducted when desert tortoises are most active (April through May or September through October). If desert tortoises are found during the second pass, a third pass may be required by the USFWS or CDFW. • If desert tortoise exclusion fence is installed, the fencing should be checked several times a day to ensure that a tortoise has not been trapped within the fence. • Any person that handles desert tortoises during clearance surveys must have appropriate authorizations from USFWS and CDFW. • If desert tortoise are observed during the survey, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures. • The area cleared and the number of desert tortoises found within that area must be reported to the local USFWS and CDFW prior to the start of construction. • Desert tortoise clearance surveys cannot be combined with surveys for any other species.	Avoidance	Prior to Construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			
BIO-6: Worker Environmental Awareness Program Training. A Worker Environmental Awareness Program (WEAP) will be developed and presented to all construction personnel prior to the start of construction activities. The WEAP training will be presented by a qualified biologist. The biologist will describe the work limits in which the Project must be accomplished. The training will include general behavior and ecology for species of concern (i.e., desert tortoise and migratory birds), identification of the species, reporting requirements, and protection measures being implemented for the Project, which may include but not be limited to: • Project personnel will not be allowed to bring pets into the Project construction site. • No hazards to the desert tortoise (e.g., auger holes, trenches, pits, or other steep-sided depressions) will be left unfenced or uncovered; such hazards will be eliminated prior to the construction crew and the biologist(s) leaving the Project construction site for the day. • During construction-related activities for the Project, motor vehicles will be limited to approved designated roadways and areas identified as permanently or temporarily affected by construction of the Project. All motor vehicles driving on approved nonpaved roads in the Project area will not exceed 20 miles per hour. • Anyone who operates a motor vehicle or construction equipment will check under the parked vehicles/equipment for the presence of desert tortoises before vehicle/equipment is moved. • Should any desert tortoise be injured or killed, all activities will be halted within 500 feet of the incident, and the Field Contact Representative (FCR) and/or Approved Biologist immediately contacted. The FCR and/or Approved Biologist will be responsible for reporting the incident to the USFWS and CDFW.	Avoidance	Prior to Construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			

BIO-7 Burrowing Owl Avoidance. A preconstruction burrowing owl survey will be performed within 500 feet of the Project's limits of disturbance and any staging areas at least 14 days prior to the initiation of ground disturbance activities and within 24 hours prior to ground disturbance in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version). The survey will be performed by a biologist experienced performing surveys for burrowing owl and species identification. All burrows within the survey area will be examined to determine occupancy by burrowing owl. If the burrow is occupied, the qualified biologist shall coordinate with CDFW and USFWS to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be approved by CDFW and USFWS prior to commencing Project activities within the recommended restricted setback distances as specified in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version) of the occupied burrow. If burrowing owls were to occur and impacts on occupied burrowing owl habitat or burrows cannot be avoided, a Burrowing Owl Plan will be prepared. The Plan will describe the minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure will only be considered as a last resort. The Project proponent will implement the Burrowing Owl Plan following CDFW and USFWS review and approval.	Avoidance	At least 14 days prior to ground disturbing activities	County-appointed Biologist/ Resident Engineer/ Construction Contractor			
BIO-8: Preconstruction Bat Survey and Exclusion. To avoid direct mortality on bats, and their daytime or maternity roosts, a qualified bat biologist will be retained to conduct bat and bat roosting site surveys prior to construction. This preconstruction survey will be conducted within 200 feet of Fornat Wash Bridge and East Channel Stubbe Wash Bridge during the general bat maternity season (between April 1 and September 30). The survey will occur at dusk and will include both acoustic data collection and an emergence count. If roosting sites or bats are not found, no further action will be necessary. Otherwise, the following exclusion is applicable: *Part A.* If the preconstruction survey finds bats to be roosting and bridge removal is scheduled to occur between October 1 and March 31 (outside of the maternity season of April 1 through September 30), bats will be evicted by the methods discussed below. In addition, if bat roosts are found in the bridge and the Project may perform work underneath or within 200-feet of the bridge with bats (between April 1 and September 30), the discussion below would also apply. The eviction of bats will be conducted using bat exclusion techniques developed by Bat Conservation International in consultation with CDFW and under the supervision of a qualified bat biologist. These techniques allow the bats to exit the roosting site but prevent re-entry. This process will include, but not be limited to, the installation of one- way exclusion devices at the bridge(s). Sealing the bridge(s) at the time of abandonment, where applicable, may prevent the need for the exclusion process. Where exclusionary devices are installed on the bridge, the devices will remain in place for seven days, at which time the exclusion points and any other potential entrances will be sealed. A visual inspection of the bridge by a qualified bat biologist will be required prior to bridge removal to verify that all bats have been successfully excluded. *Part B.* If the preconstruction survey finds bats to be roosting and bridge removal is scheduled to occur during the maternity season (April 1 through September 30), a qualified bat biologist will monitor the roost to determine if the roost site is a maternal roost. This may be determined by either visual inspection of the roost for bat pups, if possible, or monitoring the roost after the adults leave for the night to listen for bat pups. If the roost is determined to not be a maternal roost, then the bats will be evicted as described above under Part A. If the roost is determined to be a maternal roost, eviction of the maternal roost cannot occur during the nursery season, because bat pups cannot leave the roost until they have reached maturity. Once the maternity season is completed, construction and bridge removal can commence.	Avoidance	Prior to construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			
BIO-9: Preconstruction Survey for Nesting Birds. If construction activities are initiated during the bird breeding season (generally defined as February 15 through September 15, a preconstruction survey by a qualified biologist will occur no more than three days prior to vegetation removal or ground disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will use methods to avoid potential nest predation due to survey and monitoring efforts. The survey will occur within all suitable nesting habitats within the Project's limits of disturbance and a 100-foot buffer, as access is allowed. If active nests are found during the pre-construction nesting bird survey, an appropriate buffer (at least 300 feet for passerines and 500 feet for raptors) will be established on the ground around the nest by the qualified biologist until it has been determined that young have fledged, or nesting activities have ceased. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Any active nest will be monitored daily for behavioral modifications induced by construction noise or other activity. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.	Avoidance	Prior to Construction	County-appointed Biologist/ Resident Engineer/ Construction Contractor			

Visual Resources						
VIA-1: The construction contractor will preserve existing vegetation where feasible, use the existing roadway right of way for storage and laydown areas, limit construction to daylight hours, as feasible, and minimize the use of lighting to only what is required for directional and safety purposes to reduce the effects of construction on the visual environment.	Minimization	During Construction	Project Engineer/ Resident Engineer/ Construction Contractor			
VIA-2: The construction contractor will provide cost-effective, sculpted concrete and staining aesthetic treatment on the East Channel Stubbe Wash bridge that serves the Pacific Crest Trail.	Minimization	Final Design	Project Engineer/ Resident Engineer/ Construction Contractor			
Cultural Resources						
CR-1: If cultural materials are discovered during construction, all earth-moving activity within 60 feet around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.	Avoidance	During Construction	Qualified archaeologist/ Resident Engineer/ Construction Contractor			
CR-2: If human remains are discovered, Health and Safety Code Section 7050.5 states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendent (MLD). At this time, the construction contractor will coordinate with the County so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.	Avoidance	During Construction	Qualified archaeologist/ Resident Engineer/ Construction Contractor			
Paleontological Resources						
PAL-1: Preparation of a PRIMP: Prior to any ground disturbing activities, the preparation of a paleontological resource impact mitigation program (PRIMP) will be prepared by a qualified professional paleontologist (Project Paleontologist) who meets the Society of Vertebrate Paleontology's standards (2010). The purpose of the PRIMP is to establish procedures and discovery protocols based on industrywide best practices for the treatment of any paleontological resources encountered during Project related earth-disturbing activities related to Project construction. The PRIMP will include a Worker Environmental Awareness Program (WEAP) training, which would be implemented prior to the start of Project-related ground disturbance. WEAP training should be presented in-person to all field personnel to describe the types of fossils that may be found and the procedures to follow if any fossils are encountered. The PRIMP will indicate where construction monitoring will be required for the Project and the frequency of required monitoring (i.e., full-time, spot-checks, etc.).	Minimization	Final design	Qualified Paleontologist/ Resident Engineer/ Construction Contractor			
PAL-2: Pre-Construction Paleontology Survey: A pre-construction survey will be conducted to ground truth the results of the records search conclusion of high sensitivity prior to grading to avoid potential permanent impacts. The pre-construction survey will collect and process sediment samples to determine the small-fossil potential of the APE. Any fossils uncovered during construction activities will be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.	Minimization	During Construction	Qualified Paleontologist/ Resident Engineer/ Construction Contractor			
Hazards and Hazardous Materials						
HAZ-1 Asbestos-Containing Materials (ACM) and Lead-Based Paint (LBP) Surveys: A hazardous building materials survey, ACM and LBP, will be conducted for structures requiring removal during final design and prior to the start of construction. Should such materials be encountered, Caltrans Standard Specification 14-11 Hazardous Waste and Contamination and Best Management Practice WM-6 Hazardous Waste Management for the handling, transport, and disposal of hazardous building materials will be implemented by the construction contractor.	Avoidance	Final Design/Prior to Construction	Project Engineer/Resident Engineer			
HAZ-2 Yellow Paint and Thermoplastic Striping (PTS) Surveys: A survey of yellow PTS should be conducted for striping that requires removal along portions of Railroad Avenue undergoing improvements in support of the Project. The PTS survey should be conducted during final design and prior to Project construction.	Avoidance	Final Design/Prior to Construction	Project Engineer/Resident Engineer			

HAZ-3 Limited Aerially-Deposited Lead Screening Survey: A limited ADL screening survey should be conducted in areas of exposed soil within the Project area where soil is anticipated to be excavated during Project construction. The ADL survey should be conducted during final design and prior to Project construction.	Avoidance	Final Design/Prior to Construction	Project Engineer/Resident Engineer			
HAZ-4 Treated Wood Waste: Upon removal, the bridges will be managed as treated wood waste (TWW) in accordance with the Department of Toxic Substances Control (DTSC) Alternative Management Standards for TWW. The nearest Class III landfill site accepting TWW is the Lamb Canyon Landfill in Beaumont, California which is approximately 21 miles from the Project area. The construction contractor, in coordination with the County, will be required to submit all applicable permits for disposing of the TWW.	Avoidance	During Construction	Project Engineer/Resident Engineer/Construction Contractor			
Transportation/Traffic						
TRA-1: Traffic Control Plan (TCP): A TCP will be prepared for the Project prior to construction. The plan will include strategies and measures to avoid and minimize disruption to local access and roadways during construction. Detour routes will be identified, coordinated, and approved by the County and affected local agencies prior to the closure. Emergency providers and the California Highway Patrol will be notified in advance about all planned closures and detour routes. Upon construction completion, detour signage and traffic signal timings will be restored to preconstruction conditions.	Avoidance	Final Design/Prior to Construction	Project Engineer/Resident Engineer/Construction Contractor			
Hydrology and Water Quality						
WQ-1: Stormwater Pollution Prevention Plan (SWPPP). A California Construction General Permit SWPPP and an EPA Construction General Permit SWPPP for portions of the Project occurring on Tribal Lands will be developed and implemented prior to construction.	Avoidance	Prior to Construction	Stormwater Pollution Manager/ Resident Engineer/ Construction Contractor			
WQ-2: Employee Training. Employee Training BMP will be in accordance with CASQA Municipal BMP SC-70 Road and Street Maintenance and County of Riverside Maintenance Requirements and Frequencies.	Avoidance	Prior to Construction	Stormwater Pollution Manager/ Resident Engineer/ Construction Contractor			
WQ-3: Litter Control. Litter Control BMP will be in accordance with CASQA Municipal BMP SC-70 Road and Street Maintenance and County of Riverside Maintenance Requirements and Frequencies.	Minimization	During Construction	Stormwater Pollution Manager/ Resident Engineer/ Construction Contractor			
WQ-4: Slope and Channel Protection: Slope and Channel Protection BMP will be in accordance with CASQA New Development and Re-development BMP SD-10 Site Design and Landscape Planning or the equivalent County of Riverside Standard.	Minimization	During Construction	Stormwater Pollution Manager/ Resident Engineer/ Construction Contractor			
WQ-5: Minimization of Impervious Areas. Minimization of Impervious Areas BMP will be in accordance with CASQA New Development and Redevelopment BMP SD-10 Site Design and Landscape Planning or the equivalent County of Riverside Standard.	Minimization	During Construction	Stormwater Pollution Manager/ Resident Engineer/ Construction Contractor			
Greenhouse Gas Emissions						
GHG-1: During clearing, grading, earthmoving, or excavation operations, excessive fugitive dust emissions will be controlled by regular watering, or other dust preventive measures using the following procedures as specified in the South Coast Air Quality Management District Rules and Regulations: • Onsite vehicle speed will be limited to 25 miles per hour; • During clearing, grading, earthmoving, or excavation operations, areas being excavated or graded will be sufficiently watered to prevent excessive amounts of dust. Watering should occur at least twice daily with complete coverage preferable in the late morning and after work is done for the day; • All soil material transported onsite or offsite will be either sufficiently watered or securely covered to prevent excessive amounts of dust; • Areas disturbed by clearing, grading, earth moving, or excavation activities will be minimized to prevent excessive dust; • Visible dust beyond the construction limits emanating from the Project will be prevented to the maximum extent feasible.	Minimization	During Construction	Resident Engineer/ Construction Contractor			

GHG-2: Ozone precursor emissions from construction vehicles will be controlled by maintaining equipment engines in good condition, and properly tuned per manufacturer's specifications, to the satisfaction of the resident engineer.	Minimization	Final Design/During Construction	Resident Engineer/ Construction Contractor			
GHG-3: All trucks that are to haul excavated or graded material offsite will comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b), (e)(2) and (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads.	Minimization	During Construction	Resident Engineer/ Construction Contractor			
Recreation						
REC-1: Agency Coordination: The construction contractor will provide the United States Forest Service (USFS), the Bureau of Land Management (BLM), and the Pacific Crest Trail Association (PCTA) with a schedule of work, schedule of closures, and detour plans for periods of closure 90 days in advance of closure to provide 30 days' notice to trail users.	Avoidance	Prior to Construction	Project Engineer/Resident Engineer			
REC-2: Signage for Trail Detour Routes. Signs will be posted north of the I-10 undercrossing at Tamarack Road and south of the UPRR undercrossing alerting equestrians of the height restrictions at the UPRR undercrossing.	Minimization	During Construction	Project Engineer/Resident Engineer/ Construction Contractor			
REC-3: Temporary Alternative Trail Route. During construction a protected crossing will be provided at the East Channel Stubbe Wash, with the exception of the two 10-day trail closures, as an available option for hikers and equestrians to use.	Minimization	During Construction	Project Engineer/Resident Engineer/ Construction Contractor			
REC-4 Public Safety: During construction, the construction contractor will be required to establish a warning mechanism (flaggers, whistles, etc.) to alert construction workers that trail users are waiting to pass through the construction site.	Minimization	During Construction	Project Engineer/Resident Engineer/ Construction Contractor			
REC-5 Restoration of Impacted Trail Segment: Once construction is complete, any incidental or unanticipated damage or disrepair to the trail that may have resulted during construction will be restored to pre-construction conditions.	Minimization	Post-Construction	Project Engineer/Resident Engineer/ Construction Contractor			
Utilities and Service Systems						
UTIL-1: Potential relocation of suspended utilities will be coordinated with the local utility providers prior to construction and in coordination with the County.	Minimization	Final Design	Project Engineer/ Resident Engineer/ Construction Contractor			

Appendix B – Assembly Bill (AB) 52 Consultation Log

LIST OF NATIVE AMERICAN CONTACTS AND RECORD OF RESPONSES

Name	Date	Responses
Patricia Garcia-Plotkin Director/Tribal Historic Preservation Office Agua Caliente Band of Cahuilla Indians	February 23, 2022	Assembly Bill 52 (AB52) notification letter sent via United States Postal Service.
	March 10, 2022	County (Frances Segovia) received Certified Mail receipt confirming delivery of notification letter.
	March 25, 2022	Email response received from Lacy Padilla, Archaeologist for the Agua Caliente Band of Cahuilla Indians (ACBCI). Ms. Padilla notes the Project is within the Tribe's Traditional Use Area. For this reason, the ACBCI requests the following: (1) formal government-to-government consultation under California Assembly Bill 52; (2) copies of any cultural resource documentation connected to the Project; and (3) presence of an approved Cultural Resource Monitor during any ground-disturbing activities associated with the Project.
	March 29, 2022	A copy of the Archaeological Survey Report prepared for the Project was transmitted via email to Ms. Padilla.
	April 4, 2022	The County met with Ms. Padilla and Ms. Gonzalez for a formal AB 52 consultation meeting. Ms. Padilla noted five prehistoric trails (3 trails under Fornat Wash and 2 trails under East Channel Stubbe Wash) within the APE, leading from the hills north of the Project to the valley south of the Project. Ms. Padilla requested the schedule for the environmental document circulation and construction schedule, as well as a copy of the environmental document.
	May 11, 2022	The milestone schedule for the environmental document circulation and construction schedule was transmitted via email to Ms. Padilla.
	June 1, 2022	The County (Frances Segovia) emailed Ms. Padilla a monitoring denial letter and closed out AB 52 consultation with the Tribe.

Name	Date	Responses
	June 6, 2022	County received Certified Mail receipt confirming delivery of close-out consultation letter.
Ann Brierty Tribal Historic Preservation Officer Morongo Band of Mission Indians	February 23, 2022	Assembly Bill 52 notification letter sent via United States Postal Service.
	March 2, 2022	County (Frances Segovia) received Certified Mail receipt confirming delivery of notification letter.
	April 18, 2022	No response received by March 25, 2022; therefore, the County assumed the Tribe does not wish to consult on this Project. The County emailed Ms. Brierty a follow-up AB 52 initiation letter and closed out consultation with the Tribe.
	April 25, 2022	County received Certified Mail receipt confirming delivery of close-out consultation letter.
Joseph Ontiveros Tribal Historic Preservation Officer Soboba Band of Luiseno Indians	February 23, 2022	Assembly Bill 52 notification letter sent via United States Postal Service.
	March 2, 2022	County (Frances Segovia) received Certified Mail receipt confirming delivery of notification letter.
	April 18, 2022	No response received by March 25, 2022; therefore, the County assumed the Tribe does not wish to consult on this Project. The County emailed Mr. Ontiveros a follow-up AB 52 initiation letter and closed out consultation with the Tribe.
	April 25, 2022	County received Certified Mail receipt confirming delivery of close-out consultation letter.
Anthony Madrigal Tribal Historic Preservation Officer Twenty-Nine Palms Band of Mission Indians	February 23, 2022	Assembly Bill 52 notification letter sent via United States Postal Service.
	March 2, 2022	County (Frances Segovia) received Certified Mail receipt confirming delivery of notification letter.
	April 18, 2022	No response received by March 25, 2022; therefore, the County assumed the Tribe does not wish to consult on this Project. The County emailed Ms. Brierty a follow-up AB 52 initiation letter and closed out consultation with the Tribe.

Name	Date	Responses
	April 25, 2022	County received Certified Mail receipt confirming delivery of close-out consultation letter.

Appendix C - Response to Public Comments

This appendix contains the Notice of Availability/Notice of Intent to Adopt a Proposed Mitigated Negative Declaration, the Notice of Completion and all comment letters received during the public circulation period.

The Draft IS/MND was circulated for 30 days for public review and comment from June 28, 2023 to July 27, 2023. A virtual public meeting was held on July 12, 2023. The County received 18 comment letters during the public review period of the Draft IS/MND; two from federal and State resource agencies, one from regional resource agencies, two from Native American tribal groups, and 14 from interested groups, organizations, and individuals. The comment letters received and the County's response to comments are organized as follows:

Notice of Availability/Notice of Intent

PUBLIC NOTICE

Notice of Availability of a Draft Initial Study and
Intent to Adopt Proposed Mitigated Negative Declaration

Railroad Avenue Bridge Replacement Project

PUBLIC INFORMATION MEETING
Date: July 12, 2023
Time: 6:00 – 7:00 pm
Held virtually via Zoom. * For details, please visit the project website:
https://rcprojects.org/railroadbridges
*The meeting will be held virtually using Zoom and will be accessible via computer or other devices with internet connection. A current version of Zoom is recommended to access the virtual meeting.

WHAT IS BEING PLANNED? The County of Riverside Transportation Department (County) proposes to replace two existing, structurally deficient timber bridges over Fornat Wash and East Channel Stubbe Wash along Railroad Avenue. The new bridges would be in the same location and would replace the existing timber bridges with new modern concrete bridges. The bridges are being replaced so that the roadway can meet current vehicle load and safety standards. Construction is anticipated to take six months per bridge. During construction, a Traffic Management Plan would be prepared to address closures of the road.

WHY THIS PUBLIC NOTICE? The County, as Lead Agency under the California Environmental Quality Act (CEQA), has studied the proposed project and concluded that it would not significantly affect the environment. The report detailing this finding is called an Initial Study. This notice serves to advertise the availability of the Draft Initial Study and your opportunity to read and comment on it, as well as the opportunity to attend the public meeting as advertised in this notice. The Riverside County Board of Supervisors will consider approval of the project and adoption of the Mitigated Negative Declaration (MND) for the project after July 27, 2023.

WHAT'S AVAILABLE? The Draft Initial Study with Proposed MND for the proposed project will be available beginning June 28, 2023. This document will be available for 30 days from June 28, 2023 until July 27, 2023. The document will be available for review at the following locations:

- County of Riverside Transportation Department, 3525 14th Street, Riverside, CA 92501
- Cabazon Public Library, 50425 Carmen Ave, Cabazon, CA 92230 (During normal library hours)
- https://rcprojects.org/railroadbridges

WHERE YOU COME IN Please submit your comments on the Initial Study in writing or by email no later than July 27, 2023, to Frances Segovia, Riverside County Transportation Department, 3525 14th Street, Riverside, CA 92501. Comments will be accepted beginning June 28, 2023. Based on study findings, the County has determined that the proposed project will not have a significant effect on the environment because potential effects would be mitigated to a less than significant level with incorporation of mitigation measures. Potentially significant impacts for which mitigation measures were incorporated include Biological Resources. Pursuant to Section 15072(g)(5) of the CEQA Guidelines, it has been determined that the project footprint is not identified on any of the lists enumerated under Section 65962.5 of the California Government Code pertaining to hazardous waste. Your written comments will be considered in the decision on the project and will be forwarded to the Board of Supervisors before action is taken on the project. Notice of said decision will be mailed to any person requesting notification. No decision will be taken until after the review is complete.

CONTACT For more information about this project or to receive a copy of the Draft Initial Study with Proposed Mitigated Negative Declaration, please contact Frances Segovia, Senior Transportation Planner, Riverside County Transportation Department, at (951) 955-1646 or by email at fsegovia@rivco.org. In compliance with the Americans with Disabilities Act (ADA), persons with disabilities may request reasonable accommodations, including auxiliary aids and services at no cost, to participate in the meeting by contacting the individual noted above at least three (3) business days before the scheduled event. This document is available in alternate formats upon request.

AVISO PÚBLICO

Aviso de Disponibilidad del Estudio Inicial Preliminar y
Intento de Adoptar una Propuesta Declaración Negativa Mitigada
Proyecto de Reemplazo del Puente Railroad Avenue Bridge

INFORMACIÓN DE LA REUNION PÚBLICA
Fecha: 12 de julio de 2023
Tiempo: 6:00 – 7:00 pm
Realizado virtualmente a través de Zoom. * Para obtener más detalles, visite el sitio web del proyecto: https://rcprojects.org/railroadbridges
*La reunión se llevará a cabo virtualmente usando Zoom y se podrá acceder a través de una computadora o otros dispositivios con conexión a internet. Se recomienda una version actual de Zoom para acceder la reunion virtual.

¿QUÉ SE ESTÁ PLANEANDO? El Departamento de Transportación del Condado de Riverside (Condado) propone reemplazar dos puentes existentes de madera, estructuralmente deficientes sobre Fornat Wash y East Channel Stubbe Wash a lo largo de Railroad Avenue. Los nuevos puentes estarían en el mismo lugar y reemplazarían los existentes puentes de mandera con nuevos puentes de concreto modernos. Los puentes se están reemplazando para que la carretera pueda cumplir con los estándares actuales de carga de vehículos y seguridad. Se anticipa que la construcción tomará seis meses por puente. Durante la construcción, se prepararía un Plan de Gestión del Tráfico para abordar los cierres de la carretera.

¿POR QUÉ ESTE AVISO? El Condado, como la Agencia Líder bajo la Ley de Calidad Ambiental de California (CEQA, por su acrónimo en inglés), estudió el Proyecto propuesto y concluyó que no afectaría significativamente el medio ambiente. El reporte que detalla este hallazgo se llama un Estudio Inicial. Este aviso sirve para anunciar la disponibilidad del Estudio Inicial Preliminar y su oportunidad de leer y hacer comentarios, asi como la oportunidad de asistir a la reunión de información pública como se anuncia en este aviso. La Junta de Supervisores del Condado de Riverside considerará la aprobación del Proyecto y la adopción de la Declaración Negativa Mitigada (MND, por su acrónimo en inglés) para el Proyecto después de el 27 de julio de 2023.

¿QUE ESTA DISPONIBLE? El Estudio Inicial Preliminar con Propuesta MND para el proyecto propuesto estará disponible a partir del 28 de junio de 2023. Este document estará disponible durante 30 días desde el 28 de junio de 2023 hasta el 27 de julio de 2023. El document estará disponible para su revision en los siguientes lugares:

- Departamento de Transportación del Condado de Riverside, 3525 14th Street, Riverside, CA 92501
- Biblioteca Pública Cabazon, 50425 Carmen Ave, Cabazon, CA 92230 (Durante el horario normal de la biblioteca)
- https://rcprojects.org/railroadbridges

DONDE ENTRA USTED Por favor, envíe sus comentarios sobre el Estudio Inicial por escrito o por correo electrónico no más tarde el 27 de julio de 2023 a Frances Segovia, Riverside County Transportation Department, 3525 14th Street, Riverside, CA 92501 o por correo electrónico a fsegovia@rivco.org. Se aceptarán comentarios a partir del 28 de junio de 2023. Basado en los hallazgos del estudio, el Condado ha determinado que el proyecto propuesto no tendrá un efecto significativo en el medio ambiente porque los efectos potenciales se mitigarían a un nivel menos que significativo a través de la incorporación de las medidas de mitigación. Los impactos potencialmente significativos para cuales se incorporaron medidas de mitigación incluyen Recursos Biológicos. De acuerdo con la Sección 15072(g)(5) de las Directrices de CEQA, se ha determinado que el sitío del proyecto no esta identificado en ninguna de las listas enumeradas bajo la Sección 65962.5 del Código del Gobierno de California en relación con los desechos peligrosos. Sus comentarios por escrito serán considerados en la decision sobre el proyecto y serán enviados a la Junta de Supervisores antes que se tome una decision sobre el proyecto. La notificación de dicha decision se enviará por correo a cualquier persona que solicite notificación. No se tomará ninguna decision hasta después de que se complete el período de revision.

CONTACTO Para más información sobre este proyecto o para recibir una copia del Estudio Inicial Preliminar con Propuesta Declaración Negativa Mitigada, por favor comuníquese con Frances Segovia, Senior Transportation Planner, Riverside County Transportation Department, llamando (951) 955-1646 o por correo electrónico a fsegovia@rivco.org. De conformidad con la Ley de Estadounidenses con Discapacidades (ADA, por su acrónimo en inglés), las personas con discapacidades pueden solicitor adaptaciones razonables, ayudas auxiliaries y servicios sin costo, para participar en la reunion poniéndose en contacto con la persona mencionada anteriormente al menos tres (3) días laborales antes del evento programado. Este documento está disponible en formatos alternativos a pedido.

Notice of Completion

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and East Channel Stubbe Wash (Br. No. 56C0101)

Lead Agency: County of Riverside Transportation Department
Contact Person: Frances Segovia
Mailing Address: 3525 14th Street
Phone: (951) 955-1646
City: Riverside Zip: 92501
County: Riverside

Project Location: County: Riverside City/Nearest Community: Cabazon/Whitewater
Cross Streets: Haugen-Lehmann Way east and Main Street west and south of Interstate 10 (I-10) Zip Code: 92282
Longitude/Latitude (degrees, minutes and seconds): -116 ° 41 ′ 40 ″ N / 33 ° 55 ′ 27 ″ W Total Acres:
Assessor's Parcel No.: Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: Interstate 10 Waterways: Fornat Wash and Stubbe Wash
Airports: Railways: Union Pacific Railroad Schools:

Document Type:

CEQA: ☐ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other:
☒ Mit Neg Dec Other: ☐ FONSI

Local Action Type:

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☒ Other: Resolution to Adopt MND

Development Type:

☐ Residential: Units Acres
☐ Office: Sq.ft. Acres Employees
☐ Commercial: Sq.ft. Acres Employees
☐ Industrial: Sq.ft. Acres Employees
☐ Educational:
☐ Recreational:
☐ Water Facilities: Type MGD
☒ Transportation: Type Bridge Replacement
☐ Mining: Mineral
☐ Power: Type MW
☐ Waste Treatment: Type MGD
☐ Hazardous Waste: Type
☐ Other:

Project Issues Discussed in Document:

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation
☒ Agricultural Land ☒ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Air Quality ☒ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☐ Geologic/Seismic ☐ Sewer Capacity ☒ Wetland/Riparian
☒ Biological Resources ☒ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☐ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Other: Energy, Greenhouse Gas Emissions, Tribal (

Present Land Use/Zoning/General Plan Designation:

Rural Residential, Open Space Rural/Controlled Environment, Rural Residential/Rural Desert, Rural Residential, Tribal Land, Open Space Rural

Project Description: *(please use a separate page if necessary)*

Replacement of two scour critical and structurally deficient timber bridges along Railroad Avenue near Whitewater in Riverside County, California with new two-lane modern concrete bridges at the same location. The new bridges would consist of two 12-foot wide travel lanes, one in each direction, a 4-foot wide shoulder on each side, and modern barriers/railings that meet current Caltrans safety standards. The bridges would be lengthened by about one foot with the width and capacity remaining the same.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

____	Air Resources Board	X	Office of Historic Preservation
____	Boating & Waterways, Department of	____	Office of Public School Construction
____	California Emergency Management Agency	X	Parks & Recreation, Department of
X	California Highway Patrol	____	Pesticide Regulation, Department of
X	Caltrans District # 8	____	Public Utilities Commission
____	Caltrans Division of Aeronautics	X	Regional WQCB # 7
____	Caltrans Planning	____	Resources Agency
____	Central Valley Flood Protection Board	____	Resources Recycling and Recovery, Department of
____	Coachella Valley Mtns. Conservancy	____	S.F. Bay Conservation & Development Comm.
____	Coastal Commission	____	San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
____	Colorado River Board	____	San Joaquin River Conservancy
____	Conservation, Department of	____	Santa Monica Mtns. Conservancy
____	Corrections, Department of	X	State Lands Commission
____	Delta Protection Commission	____	SWRCB: Clean Water Grants
____	Education, Department of	X	SWRCB: Water Quality
____	Energy Commission	____	SWRCB: Water Rights
X	Fish & Game Region # 6	____	Tahoe Regional Planning Agency
____	Food & Agriculture, Department of	____	Toxic Substances Control, Department of
____	Forestry and Fire Protection, Department of	X	Water Resources, Department of
____	General Services, Department of		
____	Health Services, Department of	X	Other: Natural Resources Agency
____	Housing & Community Development	____	Other:
X	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date June 28, 2023 Ending Date July 27, 2023

Lead Agency (Complete if applicable):

Consulting Firm: WSP
Address: 1100 Town and Country Road, Suite 200
City/State/Zip: Orange, California 92868
Contact: Theresa Dickerson
Phone: (714) 564-2760

Applicant: Riverside County Transportation Department
Address: 3525 14th Street
City/State/Zip: Riverside, California 92501
Phone: (951) 955-1646

Signature of Lead Agency Representative: Jan Bulinski **Date:** June 28, 2023

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Revised 2010

Federal Agency Comments

Comment A – U.S. Fish and Wildlife Service (August 4, 2023)

United States Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
Ecological Services
Palm Springs Fish and Wildlife Office
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, California 92262

In Reply Refer to:
FWS-ERIV-23-0110917

August 4, 2023
Sent Electronically

Frances Segovia
Senior Transportation Planner
Riverside County Transportation Department, Environmental Division
3525 14th Street
Riverside, CA 92501

Subject: Draft Initial Study and Intent to Adopt Proposed Mitigated Negative Declaration
Railroad Avenue Bridge Replacement Project Notice of Availability

This letter is in response to the notice dated June 28, 2023, soliciting comments on the draft Initial Study and Intent to Adopt Proposed Mitigated Negative Declaration (ISMND) for the Railroad Avenue Bridge Replacement Project (Project). The County of Riverside Transportation Department (County) proposes to replace two existing, structurally deficient bridges along Railroad Avenue over Fornat Wash and East Channel Stubbe Wash. The Project would replace the existing timber bridges with new concrete bridges to meet current California Department of Transportation (Caltrans) safety design standards. All construction activities would be conducted in the existing Caltrans right-of-way (ROW).

We offer the following comments on the draft ISMND as they relate to potential impacts on public trust resources. The primary concern and mandate of the U.S. Fish and Wildlife Service (Service) is the conservation, protection, and enhancement of fish and wildlife resources and their habitats for the continuing benefit of the American people. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened or endangered animals and plants listed under the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.). The comments provided herein are based on the information provided in the draft ISMND and our knowledge of sensitive and declining fish and wildlife resources.

The draft ISMND describes replacing existing, 2-lane timber bridges with 2-lane concrete bridges, approximately 60 feet long. The elevation of the bridge over Fornat Wash may increase depending on water surface freeboard requirements. Additional roadway and channel improvements would be administered to avoid future scour problems. The draft ISMND states that "it is envisioned that the channel bottom would remain earthen." The draft ISMND does not provide a figure or description of the design of the new bridges, and it is unclear by the project description how the channel bottom would remain earthen. We recommend that the County expand on the design features of the bridges and provide a figure to clarify how the channel bottom would remain earthen. A1

The Project area is proposed within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) in the Cabazon and Snow Creek/Windy Point Conservation Area. The County of Riverside is a Local Permittee under the CVMSHCP and must comply with the terms and conditions of the CVMSHCP to ensure achievement of the CVMSHCP's Conservation Goals and Objectives and Required Measures in each Conservation Area. In addition, Local Permittees must participate in the Joint Project Review (JPR) process (Section 6.6.1.1 of the CVMSHCP) for projects within Conservation Areas and implement Land Use Adjacency Guidelines (Section 4.5 of the CVMSHCP). However, operations and maintenance of Covered Activities are not subject to the JPR process. The draft ISMND states that the proposed Project is a Covered Activity under Section 7.3.1.1 of the CVMSHCP and is related to operations and maintenance of public access facilities. Therefore, the proposed Project would not be subject to the JPR process.

After our review of the draft ISMND, the Service does not consider the proposed Project consistent as a Covered Activity under Section 7.3.1.1 of the CVMSHCP. We make this determination based on how Section 7.3.1.1 describes Covered operation and maintenance activities. Specifically, Section 7.3.1.1 states that "bridge maintenance, including deck and railing replacement, column replacement, and reconstruction/placement of check dams" are Covered Activities of the CVMSHCP. The proposed Project would replace two bridges and administer roadway and channel improvements, which is not described as a Covered Activity under operation and maintenance activities in Section 7.3.1.1. Therefore, we request that the County provide details and clarification as to how the Project would be considered a Covered Activity. A2

Section 6.6.1 Obligations of Local Permittees of the CVMSHCP states that Local Permittees should also consult with Coachella Valley Conservation Commission (CVCC) for Covered Activities having the potential to affect connectivity of habitat within the Conservation Areas. We request that the County provide an analysis on the effects of the proposed Project on habitat connectivity within the Cabazon and Snow Creek/Windy Point Conservation Area. A3

In addition, the Service requests that the County provide an analysis and determination of consistency with the CVMSHCP, according to Section 6.6.1 Obligations of Local Permittees. A4

Overall, we recommend that the County coordinate with CVCC, California Department of Fish and Wildlife, and the Service to determine consistency with the CVMSHCP and whether or not the proposed Project would be considered a Covered Activity. A5

Lastly, the draft ISMND states that the Project area lacks Core Habitat for Covered Species under the CVMSHCP. However, the draft document also states that Core Habitat exists or has the potential to exist for burrowing owl (*Athene cunicularia*), Mojave desert tortoise (*Gopherus agassizii*), and Covered bat species. Section 4.3.1 of the CVMSHCP states that there is no Core Habitat for Covered Species within the Cabazon Conservation Area, and Section 4.3.3 states that Core Habitat exists for Coachella Valley milk-vetch (*Astragalus lentiginosus var. coachellae*), Coachella Valley giant sand-treader cricket (*Macrobaenetes valgum*), Coachella Valley Jerusalem cricket (*Stenopelmatus cahuilaensis*), and Coachella Valley fringe-toed lizard (*Uma* A6

inornata) in Snow Creek/Windy Point Conservation Area. We request that the County include a figure in the draft ISMND of the habitat models from the CVMSHCP to clarify the types of habitat that may occur within the Project Area. A6 Cont.

We appreciate the opportunity to provide comments on the draft ISMND. If you have any questions regarding this document, please contact Lory Salazar-Velasquez[1] of the Palm Springs Fish and Wildlife Office.

Sincerely,

VINCENT JAMES
Digitally signed by VINCENT JAMES
Date: 2023.08.03 12:07:07 -07'00'

For Rollie White
Assistant Field Supervisor

[1] lory_salazar-velasquez@fws.gov

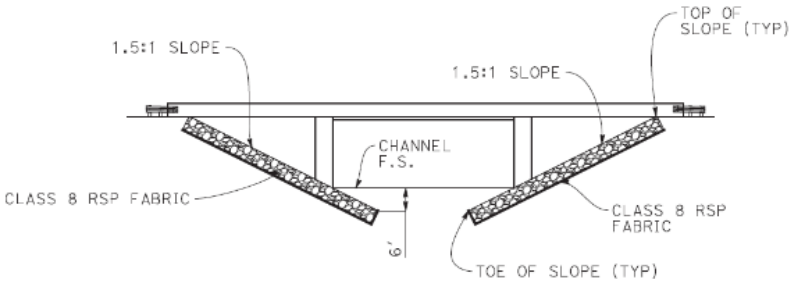
Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment A1:

The commenter asks how the channel bottom will remain earthen, to expand on the design features of the bridges, and to provide a figure to clarify how the channel bottom will remain earthen.

Response:

The proposed Project would replace the existing 2-lane timber bridges with new 2-lane modern concrete bridges. The proposed replacement bridges would be single-span, precast/prestressed concrete slabs with driven steel piles. Additionally, ungrouted riprap would be placed at the southeast and southwest corners of the bridges and would extend six feet below the channel bottom. Other than the local corners, the channels would remain earthen. The abutments below the bridge have no riprap as the footings are placed deep enough to accommodate the hydraulic scour. The design requires Caltrans Class 8 Rock Slope Protection (RSP) fabric between the native soil and free draining aggregate (rocks) to protect the channel slope abutments and bridge piers.



RIPRAP SIZING			
SITE	THICKNESS	CLASS	6" BEDDING
FORNAT WASH	2.5 FT	IV	SAND
E. CHANNEL STUBBE WASH	4 FT	VIII	1" ROCK

RIPRAP DETAILS
FORNAT WASH & E. CHANNEL STUBBE WASH
NO SCALE

Comment A2:

Commenter states they do not consider the proposed Project consistent as a Covered Activity under Section 7.3.1.1 of the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) based on how Section 7.3.1.1 describes covered operation and maintenance activities. Commenter notes that bridge replacement and administration of roadway and channel improvements are not described as Covered Activities under operation and maintenance activities in Section 7.3.1.1. Commenter requests the County provide details and clarification as to how the Project would be considered a Covered Activity.

Response:

The Project is a Covered Activity per section 7.3.1.1 *Covered Operation, Maintenance, and Safety Activities within the Existing Rights-of-Way or Easements* because operations and maintenance (O&M) activities include bridge maintenance such as deck and railing replacement, column replacement, and reconstruction/placement of check dams. Impacts to Railroad Avenue due to O&M, including bridge repair and replacement, have already been accounted for during the CVMSHCP planning process and factored into the County's existing obligations. This was confirmed by the Coachella Valley Conservation Commission (CVCC) in April and September of 2019 during consultation and reconfirmed in a public comment to the IS/MND dated July 21, 2023 (see Comment G1). During additional consultation conducted between February and May of 2024, the CVCC reconfirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance, as described in Section 7.3.1.1 of the CVMSHCP (see letter dated May 22, 2024, Appendix D). Furthermore, during a meeting with the CVCC in May 2024, the CVCC noted that the Project is considered an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring.

Comment A3:

Commenter requests that the County provide an analysis on the effects of the proposed Project on habitat connectivity within the Cabazon and Snow Creek/Windy Point Conservation Area as a part of the obligations of local permittees of the CVMSHCP and to consult with the CVCC for Covered Activities.

Response:

Section 3.4 *Biological Resources*, Environmental Setting section *Wildlife Corridors* subsection in the Final IS/MND, has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. Section 3.4, *Biological Resources*, also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area. An analysis of temporary impacts to wildlife connectivity is provided in threshold d) under *Impact Analysis* in the Final IS/MND.

The Project is a Covered Activity per section 7.3.1.1 *Covered Operation, Maintenance, and Safety Activities within the Existing Rights-of-Way or Easements* because operations and maintenance (O&M) activities include bridge maintenance such as deck and railing replacement, column replacement, and reconstruction/placement of check dams. Impacts to Railroad Avenue due to O&M, including bridge repair and replacement, have already been accounted for during the CVMSHCP planning process and factored into the County's existing obligations.

During consultation with the CVCC in April and September of 2019, it was confirmed that the Project was a Covered Activity and reconfirmed in the comment letter to the IS/MND dated July 21, 2023. In a letter dated May 22, 2024 (see Appendix D), the CVCC noted that O&M activities are not required to undergo the Joint Project Review process; however, activities that may impact habitat connectivity are subject to consultation with the CVCC. Therefore, additional consultation was held with CVCC between February and May of 2024, the CVCC reviewed the preliminary design plans and stated that it was not anticipated the corridors would be adversely

impacted by the proposed O&M activities. The CVCC requested an additional opportunity to review the Project design plans prior to finalization to ensure minimum bridge dimensions have been maintained.

Comment A4:

Commenter requests that the County provide an analysis and determination of consistency with the CVMSHCP, according to Section 6.6.1, *Obligations of Local Permittees*.

Response:

An analysis of the Project's consistency with the CVMSHCP is included in Section 5.9, *Coachella Valley Multiple Species Habitat Conservation Plan* of the Natural Environment Study (Minimal Impact) [NES(MI)]. The NES(MI) can be found on the County's website at https://rcprojects.org/railroadbridges. Furthermore, Section 3.4, Biological Resources, Impact (f) of this Final IS/MND has been updated to reflect the full consistency analysis found in the NES(MI).

Comment A5:

Commenter recommends that the County coordinate with the CVCC, California Department of Fish and Wildlife (CDFW), and United States Fish and Wildlife Service (USFWS) to determine consistency with the CVMSHCP and whether or not the Project is a Covered Activity.

Response:

The CVCC confirmed the Project is a Covered Activity during consultation in September and April of 2019, and in a comment letter to the IS/MND dated July 21, 2023. An analysis of the Project's consistency with the CVMSHCP is included in Section 4.1.2, *Discussion of CVMSHCP Biological Corridors*, and Section 5.9, *Coachella Valley Multiple Species Habitat Conservation Plan* of the NES(MI). As stated above, the NES(MI) can be found on the County's website at https://rcprojects.org/railroadbridges.

Furthermore, during a meeting held on March 19, 2024 with the CVCC, the CVCC indicated that the Project was considered an O&M activity because it was not proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring. Additionally, the CVCC stated during consultations conducted between February and May of 2024 that no further agency coordination is required by the County related to CVMSHCP consistency.

Comment A6:

Commenter requests that the County include a figure in the IS/MND of the habitat models from the CVMSHCP to clarify the types of habitat that may occur within the Project Area.

Response:

Figures showing biological resources, including natural communities, and habitat models were added to the Final IS/MND. There is no Core Habitat for CVMSHCP Covered Species in the Cabazon Conservation Area. There is Other Conserved Habitat for burrowing owl (*Athene cunicularia*) and desert tortoise (*Gopherus agassizii*); but no Covered bats. Within the Snow Creek/Windy Point Conservation Area, there is Core Habitat for Coachella Valley milkvetch, Coachella Valley giant-sand-treader cricket, Coachella Valley Jerusalem cricket and Coachella

Valley fringe-toed lizard, Coachella Valley round-tailed ground squirrel, and Palm Springs pocket mouse.

The Final IS/MND has been updated to reflect that burrowing owls, bats, and desert tortoises are covered species under the CVMSHCP. As a result of the Project area occurring within suitable habitat for these species, an analysis of burrowing owls, bats, and desert tortoise is included in the Final IS/MND and surveys for these species were performed in 2019. Pre-construction surveys associated with the implementation of Avoidance and Minimization and/or Mitigation Measures BIO-5, BIO-7, and BIO-8 would prevent unintended impacts to desert tortoises, burrowing owls, and bats.

State Agency Comments

Comment B – California Department of Fish and Wildlife (August 4, 2023)

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Desert Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 3, 2023
Sent via email

Frances Segovia
Senior Transportation Planner
County of Riverside Transportation Department
3525 14th Street
Riverside, CA 92501

Railroad Avenue Bridge Replacement Project (PROJECT)
Mitigated Negative Declaration (MND)
SCH# 2023060768

Dear Frances Segovia:

The California Department of Fish and Wildlife (CDFW) received a Mitigated Negative Declaration (MND) from the County of Riverside Transportation Department (County) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA guidelines.[1]

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

CDFW ROLE

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

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

Conserving California's Wildlife Since 1870

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

PROJECT DESCRIPTION SUMMARY

Proponent: County of Riverside Transportation Department

Objective: The proposed Project involves the replacement of two existing, structurally deficient timber bridges over Fornat Wash (Bridge Number 56C0099) and East Channel Stubbe Wash (Bridge Number 56C0101) along Railroad Avenue. The new bridges would be in the same location and would replace the existing 2-lane timber bridges with new 2-lane modern concrete bridges. The proposed road width would consist of two 12-foot-wide travel lanes, one lane in each direction, and a 4-foot-wide shoulder on each side. Rock slope protection would be installed to replace the current vertical abutment walls and timber piers. Rock slope protection would extend into portions of the bed of the current ephemeral stream. Rock slope protection would also extent to the south beyond the footprints of the new proposed bridges. The proposed bridges would be approximately 60 feet long depending on the channel hydraulic capacity and water surface freeboard requirements. Potentially the elevation of Fornat Wash Bridge may increase, but by no more than two feet to meet freeboard requirements. The East Channel Stubbe Wash Bridge elevation would remain the same. Bridge demolition would include removal of existing wooden wing walls, abutments, and piers, and replacement with modern concrete alternatives. It is envisioned that the channel bottom would remain earthen. An existing underground telephone line along the north side of Railroad Avenue and suspended along the north side of the East Channel Stubbe Wash bridge would be affected by construction and may require relocation. All construction activities would be conducted within the existing roadway right of way with construction staging and material laydown areas on the roadway itself. Railroad Avenue between the two bridges to be replaced would be closed to continuous traffic during construction. The Project would not install any new permanent lighting and construction would primarily be limited to daylight hours.

Location: The proposed Project is located within the Whitewater, California USGS 7.5-minute quadrangle: Fornat Wash Bridge (#56C0099): Section 11 & 12 of Township 35, Range 2 E; East Channel Stubbe Wash Bridge (#56C0101): Section 8 of Township 35, Range 3 E. The proposed Project is along Railroad Avenue between Haugen-Lehmann

Way east and Main Street west and south of Interstate 10 (I-10). The Project is located within the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area of the Coachella Valley Multiple Species Habitat Conservation Plan.

Timeframe: The Project proposes that the duration of construction is anticipated to be about 12 months (6 months per bridge). The Project's proposed start date is not indicated in the MND.

COMMENTS AND RECOMMENDATIONS

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (i.e., biological resources). CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The MND has not adequately identified and disclosed the Project's impacts (i.e., direct, indirect, and cumulative) on biological resources and whether those impacts are reduced to less than significant.

CDFW's comments and recommendations on the MND are explained in greater detail below and summarized here. CDFW is concerned that the MND does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the MND lacks sufficient information to facilitate a meaningful review by CDFW, including a detailed description of rock slope protection. CDFW requests that additional information and analyses be added to a revised MND, along with avoidance, minimization, and mitigation measures that avoid or reduce impacts to less than significant.

B1

Project Description

Compliance with CEQA is predicated on a complete and accurate description of the proposed Project. Without a complete and accurate Project description, the MND likely provides an incomplete assessment of Project-related impacts to biological resources. CDFW has identified gaps in information related to the Project description.

The MND lacks a detailed description of rock slope protection infrastructure that is proposed beneath and south of the proposed bridges (see Project Description section below). CDFW requests that the MND is revised to include additional information on the locations of proposed rock slope protection and if it will be grouted or ungrouted. To conduct a meaningful review and provide biological expertise on how to protect fish and wildlife resources, CDFW requires a complete and accurate Project description.

B2

Mitigation Measures

CEQA requires that an MND include mitigation measures to avoid or reduce significant impacts. CDFW is concerned that the mitigation measures proposed in the MND are not adequate to avoid or reduce impacts to biological resources to below a level of significance. To support the County in ensuring that Project impacts to biological resources are reduced to less than significant, CDFW recommends adding mitigation measures for an assessment of biological resources and the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) Joint Project Review process, as well as revising the mitigation measures for burrowing owl, nesting birds, desert tortoise, and compensatory mitigation for replacement/restoration of jurisdictional waters. B3

1) Project Description

Exhibit C of the Location Hydraulic Study and Summary Floodplain Encroachment Report dated February 2020 (Hydraulic Report) includes design plans for the two proposed bridges associated with the Project. The Exhibit shows that rock slope protection will be installed to replace vertical abutment walls and timber piers, and that rock slope protection will be installed beneath sections of the bed of the current ephemeral streams. Page 2 of the MND indicates that "it is envisioned that the channel bottom would remain earthen." The MND lacks important details on proposed rock slope protection including its locations and dimensions (i.e., how far into the current ephemeral stream habitat rock slope protection will extend and at what depth) and the type of riprap to be used in rock slope protection including if it will be grouted or ungrouted. The MND and its supporting documents also lack definitive information on any riprap, concrete, or other materials that will be installed across the remaining central sections of the ephemeral streams (between the proposed rock slope protection installed beneath both sides of the current ephemeral streams). Without detailed design plans on proposed rock slope protection to be installed under the bridges, CDFW is unable to conduct a meaningful review of the Project or provide the Lead Agency with biological expertise related to activities that have the potential to adversely affect fish and wildlife resources. CDFW recommends that the County revise the MND to include detailed design plans and descriptions of all infrastructure proposed for construction under the bridges and recirculate the MND to CDFW and the public for review. B4

2) Assessment of Biological Resources

Page 30 of the MND indicates that a "habitat assessment was conducted in May 2017, followed by a special-status plant focused survey with site visits in May, July, and October 2017 in suitable habitat of the BSA." Regarding special-status wildlife species, page 30 of the MND also indicates that surveys within the Project sites were last conducted in 2017 and 2019. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a Project is critical to the assessment of environmental impacts, that special emphasis should be placed on environmental B5

resources that are rare or unique to the region, and that significant environmental impacts of the proposed Project are adequately investigated and discussed. CDFW recommends that the County revise the MND to include the findings of a complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the Project area and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Based on findings from a recent biological inventory, CDFW recommends that the County revise the MND to include an analysis of direct, indirect, and cumulative impacts to biological resources and identification of appropriate avoidance, minimization, and mitigation measures. B5 Cont.

CDFW recommends that County add the following mitigation measure to a revised MND:

Mitigation Measure BIO-[A]: Assessment of Biological Resources

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought. B6

In terms of assessing Project impacts on the functions of the biological corridors associated with the two underpasses, page 32 of the MND states that there are "no known studies conducted for wildlife movement within Fornat Wash." In fact, several studies that have been completed on the use of these two underpasses and other underpasses in the area with regard to their function as biological corridors. CDFW recommends that the County revise the MND to include a discussion of how the Project will impact these two underpasses and their current functions as biological corridors taking into consideration the findings of these studies. These studies should also be B7

used to inform appropriate avoidance, minimization, and mitigation measures for the Project so that the underpasses continue to function in their current capacity as biological corridors for special status species and other wildlife. These studies include the following:

- Myers, S.J., S. Ogg, and L.F. LaPré. 1996. Potential wildlife corridors in the San Gorgonio Pass: Initial Report. Prepared for The Wildlands Conservancy; prepared by Tierra Madre Consultants, Inc.

- Murphy-Mariscal, M. L., Barrows, C. W., Fallen, M. F. Native Wildlife use of Highway Underpasses in a Desert Environment. The Southwestern Naturalist, December 2015, Vol. 60, No. 4, pages 340-348. Link: https://www.jstor.org/stable/pdf/44731764.pdf?casa_token=9ITXLc0SHsUAAAAA:q8XKlgq-GmcdRs0O3BHZ-P8tORLNmnrAF8HnGSrKQJlDb9Vjbp5kNpAPOboyauA1pG1o57objlRs9sRJuBuBBP7Uly9QJYpoh-JgXI3A-HSHtEIir68Q.

- Barrows, C. W., Fleming, K. D., Allen, M. F. Identifying Habitat Linkages to Maintain Connectivity for Corridor Dwellers in a Fragmented Landscape. The Journal of Wildlife Management 75(3): 682-691; 2011. Link: https://wildlife.onlinelibrary.wiley.com/doi/pdf/10.1002/jwmg.138?casa_token=Es13-tKNFVYAAAAA:tER7235SeXICo6Ija8BNnxkIsLSMbEcR_58RKbUr1vuzIHbEjQyFZCZprILeeHCWiJeKKxPtHmHbbqf0cA.

B7 Cont.

3) Coachella Valley Multiple Species Habitat Conservation Plan

Regarding compliance with the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), page 9 of the Project's Natural Environment Study dated February 2020 indicates that "Marisa Flores (ICF) initially contacted Jim Sullivan (Coachella Valley Associate Governments [CVAG]) via email on April 16, 2019 to determine whether the Covered Activity would be considered Operations and Maintenance and would be exempt from the CVMSHCP Joint Project Review (JPR). Mr. Sullivan (CVAG) confirmed the project would not be required to go through the JPR (Jim Sullivan, personal communication, September 18, 2019) (refer to Appendix B)." CDFW has concerns about the validity of this determination concerning the Project being considered an Operations and Maintenance Activity and the County not needing to participate in the JPR process for this Project. CDFW recommends the County start a new consultation with current staff at the Coachella Valley Conservation Commission (the Implementing Entity for the CVMSHCP) and California Department of Fish and Wildlife and the U.S. Fish and Wildlife Agency (Wildlife Agencies) to discuss the County's obligations under the CVMSHCP and this Project's applicable requirements to comply with the CVMSHCP. CDFW recommends that the MND and its supporting documents are revised to include detailed and accurate information on the Project's

B8

requirements to be in compliance with the CVMSHCP. CDFW also requests per CVMSHCP Section 6.6.1 that the County provide a detailed analysis and discussion of how the Project is consistent with the CVMSHCP.

CDFW has the following comments regarding the Project's compliance with the CVMSHCP:

1) The Implementing Agreement for the Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan states, under the Permittees' Take Authorization and Obligations Section, that Riverside County obligations include, but are not limited to, the requirement to "participate in the Joint Project Review process set forth in Section 6.6.1.1 of the MSHCP for projects in the Conservation Areas." Further, CVMSHCP Section 6.6.1 (Obligations of the Local Permittees) indicates local permittees, including Riverside County, must "participate in the Joint Project Review process for projects within Conservation Areas as described in Section 6.6.1.1 and implement the Land Use Adjacency Guidelines described in Section 4.5."

   CVMSHCP section 6.6.1.1 (Joint Project Review process within Conservation Areas) indicates that "O&M [Operations and Maintenance] of Covered Activities is not subject to the Joint Project Review Process"; however, CDFW is concerned about the determination on page 40 of the MND that the Project is "considered a project relating to "Operations and Maintenance, public access facilities." CVMSHCP Section 7.3.1.1 (Covered Operation, Maintenance, and Safety Activities within Existing Rights-of-Way or Easements) indicates that "except as otherwise identified in the Section 4.3 subsections on individual Conservation Areas, operation and maintenance activities by Permittees within Conservation Areas that are Covered Activities include, but are not limited to, the following within existing rights-of-way or easements: "bridge maintenance, including deck and rail replacement, column replacement, and reconstruction/placement of check dams." The Project proposes the complete replacement of two bridges and is not limited to deck and rail replacement and/or column replacement. CDFW does not consider the Project as a Covered Operation, Maintenance, and Safety Activities within Existing Rights-of-Way or Easements per CVMSHCP Section 7.3.1.1 because the full bridge replacement is not listed in CVMSHCP Section 7.3.1.1 as a Covered Operation, Maintenance, and Safety Activities within Existing Rights-of-Way or Easements.

   Because the Project is located within the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area and full bridge replacement is not listed as an Operations and Maintenance Activity per CVMSHCP Section 7.3.1.1, CDFW recommends that the County participate in the Joint project Review process as outlined in CVMSHCP Section 6.6.1.1.

B8 Cont.

Further, CVMSHCP Section 7.3.1.1 indicates that "*Except as otherwise identified in the Section 4.3 subsections on individual Conservation Areas*, operation and maintenance activities by Permittees within Conservation Areas that are Covered Activities include, but are not limited to, the following within existing rights-of-way or easements". This language indicates that even Operations and Maintenance activities need to comply with Conservation Objectives and Required Measures within Conservation Areas. Whether or not the Project is considered an Operations and Maintenance activity, the Project needs to comply with Conservation Objectives and Required Measures for the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area (see next section). B8 Cont.

2) The Implementing Agreement for the Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan states, under the Permittees' Take Authorization and Obligations Section, that Riverside County obligations include, but are not limited to, "compliance with relevant processes to ensure application of the Conservation Area requirements set forth in Section 4.0 of the MSHCP". Further, CVMSHCP Section 6.6.1 (Obligations of the Local Permittees) indicates local permittees, including Riverside County, must "ensure achievement of the Plan's Conservation Goals and Objectives and Required Measures in each Conservation Area identified in Section 4.3 and attainment of the Species Conservation Goals and Objectives identified in Section 9." The MND lacks a discussion of how the Project is consistent with Conservation Objectives and Required Measures of the Cabazon Conservation Area (CVMSHCP Section 4.3.1) and Snow Creek/Windy Point Conservation Area (CVMSHCP Section 4.3.3). In addition to participating in the Joint Project Review process (where the Project's compliance with the requirements of the CVMSHCP and the Implementing Agreement is overseen), CDFW recommends that the County revise the MND to include a discussion of how the Project is consistent with the Conservation Objectives and Required Measures for these two Conservation Areas. B9

   For the bridge over Fornat Wash (Bridge Number. 56C0099) within the Cabazon Conservation Area, the following Conservation Objectives and Required Measures that are particularly relevant to the Project include, but are not limited to, the following:

   a. CVMSHCP Section 4.3.1, Conservation Objective 5: "Maintain the current capacity for fluvial (water-borne) sand transport along 4,496 acres of the San Gorgonio River and its tributaries." B9.1

   b. CVMSHCP Section 4.3.1, Conservation Objective 6: "Maintain *functional* Biological Corridors under I-10 by conserving at least 631 acres in the Fornat Wash Biological Corridor to *maintain ecosystem function for Covered Species*." B9.2

c. CVMSHCP Section 4.3.1, Required Measure 1: "Conservation of the identified fluvial sand transport process areas will be achieved through application of the general plan land use designations and policies. In the fluvial sand transport areas, the Permittees will require that natural flows onto a parcel on which Development is proposed shall be conveyed offsite in the natural pre-disturbance direction of flow, and will require that Development on the property shall not impede water-borne sand transport across the parcel in its natural direction of flow. In addition, water-borne sediments and floodwaters shall not be artificially retained onsite. Concentration of flows and increase in flow velocity offsite shall be minimized to the maximum extent Feasible to avoid downstream erosion and scour. Alternatively, a flood control structure for the area that is designed to ensure no reduction in sediment transport from the sand source area to the sand deposition area where aeolian sand transport processes are active may be used to achieve the Conservation Objective of fluvial sand transport." B9.3

d. CVMSHCP Section 4.3.1, Required Measure 2: "The culvert conveying Fornat Wash under I-10 shall be *maintained by Caltrans at no less than its current size, with a soft-bottom, to maintain current levels of sand transport and wildlife movement under I-10*." CDFW considers "soft-bottom" to mean bottomless and without the installation of any infrastructure such as riprap, concrete, or other materials. Grouted riprap, concrete, and other impermeable materials installed within the bed and banks of a stream can permanently limit that ability of perennial plants to establish deep root systems, which are needed to establish, survive, and tolerate drought conditions.[2,3] Deep-rooted perennial plants that may occupy Project areas may include, but may not limited to, desert willow (*Chilopsis linearis*), saltbush (*Atriplex* spp.), and smokebush (*Psorothamnus spinosus*). The quality of habitat within an underpass is an important variable in is function as a biological corridor. Landscape features play an important role in B9.4

[2] Wang, J., Fu, B., Lu, N., Wang, S., and Zhang, L., 2019. Water use characteristics of native and exotic shrub species in the semi-arid Loess Plateau using an isotope technique, Agriculture, Ecosystems & Environment, Vol. 276.

[3] Noy-Meir, I., 1973. Desert ecosystems: environment and producers. Annual Review of Ecology and Systematics 4:25–51.

facilitating or inhibiting the dispersal process for wildlife.[4] The Project includes an undercrossing located within Fornat Wash under I-10, and page 1 of the MND indicates that the County is proposing the Project "in cooperation with the California Department of Transportation"; therefore, Required Measure 2 would apply to the Project. B9.4 Cont.

e. CVMSHCP Section 4.3.1, Required Measure 3: "Outside of the fluvial sand transport Essential Ecological Process area, the Permittees shall comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5." B9.5

For the bridge constructed within the Snow Creek/Windy Point Conservation Area, the following Conservation Objectives and Required Measures that are particularly relevant to the Project include, but are not limited to, the following:

a. CVMSHCP Section 4.3.3, Conservation Objective 8: "Maintain functional Biological Corridors and Linkages under I-10 and Highway 111 by conserving at least 415 acres of identified Biological Corridor in the unincorporated portion of the Conservation Area and at least 247 acres identified Biological Corridor in the City of Palm Springs' portion, such that the functionality of each individual Biological Corridor listed below is not compromised: a. Conserve the Stubbe Canyon Wash Biological Corridor south of the I-10 to maintain potential Habitat connectivity for desert tortoise, Coachella Valley round-tailed ground squirrel, and Palm Springs pocket mouse, and to maintain ecosystem function for Covered Species." B9.6

b. CVMSHCP Section 4.3.3, Required Measure 1: "The culvert under Highway 111 west of Windy Point and the bridge over the San Gorgonio River at Windy Point will be maintained by Caltrans at no less than their current size, with soft-bottoms, to maintain current levels of sand transport and potential wildlife movement under Highway 111." The Project includes a bridge over the San Gorgonio River, and page 1 of the MND indicates that the County is proposing the Project "in cooperation with the California Department of Transportation"; therefore, Required Measure 2 would apply to the Project. B9.7

c. CVMSHCP Section 4.3.3, Required Measure 2: "The Permittees shall comply with applicable avoidance, minimization, and mitigation measures B9.8

[4] Noss, R. F, Larry, D. H., notes, Networks, and MUMs: Preserving Diversity at All Scales, Environmental Management, May 1986.

described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5."

B9.8 Cont.

Although the Project's compliance with the requirements of the CVMSHCP and Implementing Agreement will be analyzed and determined through the Joint Project Review process, CDFW recommends that the MND is revised to accurately reflect the Project's requirements to comply with the CVMSHCP, including, but not limited to, participating in the Joint Project Review process, complying with the Conservation Objectives and Required Measures of the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area, ensuring compliance with all applicable Required Avoidance, Minimization, and Mitigation Measures in CVMSHCP section 4.5, and complying with Land Use Adjacency Guidelines set forth in CVMSHCP section 4.5.

B9.9

To support the County in fulfilling its obligations as a local permittee under the CVMSHCP and identifying all appropriate requirements of the Project to be in compliance with the CVMSHCP, CDFW recommends the County add the following mitigation measure to a revised MND:

Mitigation Measure BIO-[B]: CVMSHCP Joint Project Review Process

Prior to Project construction activities, the County of Riverside will participate in the Joint Project Review process for the Railroad Avenue Bridge Replacement Project per CVMSHCP Section 6.6.1.1.

B9.10

4) Burrowing Owl

Burrowing owl (*Athene cunicularia*) is a California Species of Special Concern. Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5, and 3513. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.). Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill."

Page 31 of the MND indicates that the "focused survey found four (4) suitable burrows near Fornat Wash bridge and seven (7) near East Channel Stubbe Wash bridge. Although suitable burrows were found, there were no burrowing owls or signs of burrowing owls (i.e., whitewash, tracks) found during the focused survey." Suitable burrowing owl habitat is located within the Project sites. Because surveys for special status species were last conducted in 2017 and 2019 and are outdated (see the Assessment of Biological Resources section), CDFW recommends that the MND is revised to include the results of recent focused surveys and an impact assessment

B10

following guidelines in the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012[5]). Although the MND includes Mitigation Measure BIO-7 for burrowing owl, CDFW considers the measure to be inadequate in scope and timing to reduce impacts to less than significant. CDFW recommends that County revise Mitigation Measure BIO-7, with additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-7: Burrowing Owl Avoidance ~~Preconstruction Burrowing Owl Surveys~~

Suitable burrowing owl habitat has been confirmed on the Project site and surrounding area; therefore, focused burrowing owl surveys shall be conducted in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version) prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, mitigation, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls along with proposed relocation actions. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.

Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version). Preconstruction surveys should

B10

[5] California Department of Fish and Game (CDFG). 2012. Staff report of burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html

be performed by a qualified biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and USFWS to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be approved by CDFW and USFWS prior to commencing Project activities. ~~A preconstruction burrowing owl survey will be performed within 500 feet of the Project's limits of disturbance and any staging areas at least 14 days prior to the initiation of ground disturbance activities. The survey will be performed by a biologist experienced performing surveys for burrowing owl and species identification. All burrows within the survey area will be examined to determine occupancy by burrowing owl. If the burrow is occupied, it will be flagged or staked, and a 160-foot buffer applied during the non-breeding season (September 1 through March 14) and 250-foot buffer applied during the breeding season (March 15 through August 31). No construction activities will be permitted within the avoidance buffer until the young are no longer dependent on the burrow. If the burrow is unoccupied, the burrow will be made inaccessible to owls (e.g., one -way doors), and the Project may proceed. If either a nesting or escape burrow is occupied, relocation of owls could occur pursuant to CDFW 2012 protocol. A burrow will be considered occupied if at least one burrowing owl has been observed occupying a burrow during the past three years, either through observation during protocol surveys or through CNDDB records.~~

B10

5) Nesting Birds

It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

Page 38 of the MND indicates that the "proposed Project could potentially affect nesting birds. Noise, dust, and vibration generated by construction activities could result in nest abandonment in natural habitats adjacent to the impacted areas." The MND includes Mitigation Measure BIO-9, which indicates that if "construction activities are initiated during the bird breeding season (defined as February 15 through September 15), a preconstruction survey by a qualified biologist will occur within three days prior to construction activities." CDFW recommends that disturbance of occupied nests of

B11

migratory birds and raptors within the Project site and surrounding area be avoided **any time birds are nesting on-site.** CDFW considers the Mitigation Measure BIO-9 to be insufficient in scope and timing to reduce impacts to nesting birds to less than significant.

CDFW recommends the County revise Mitigation Measure BIO-9, with additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-9: Nesting Birds ~~Preconstruction Surveys for Nesting Birds~~

Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Established buffers shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. ~~If construction activities are initiated during the bird breeding season (defined as February 15 through September 15), a preconstruction survey by a qualified biologist will occur within three days prior to construction activities. The survey will occur within all suitable nesting habitats within the Project's limits of disturbance and a 100-foot buffer, as access is allowed. If nesting birds are found at any time, an appropriate buffer will be established around the nest by the qualified biologist until it has been determined that young have fledged, or nesting activities have ceased.~~

B11

6) Desert Tortoise

Consistent with CEQA Guidelines, Section 15380, the status of the desert tortoise as a threatened species pursuant to the federal Endangered Species Act (16 U.S.C. § 1531 et seq.) and the California Endangered Species Act (Fish & G. Code, § 2050 et seq.) qualifies it as an endangered, rare, or threatened species under CEQA. Desert tortoise populations have declined significantly in recent decades as a result of human activities in their native habitat including land development, off-road vehicle use, overgrazing, agricultural development, military activities, predation, and the spread of invasive plant

species.[6] The desert tortoise population in the western Mojave Desert has declined by 90% since the 1980s. Desert tortoises can take up to 20 years to reach sexual maturity, which limits their ability to recover from even small losses in population numbers.[6].

Page 32 of the MND indicates that "due to the location and height of the UPRR, Railroad Avenue, and I-10 bridges, the East Channel Stubbe Wash is expected to be used by a variety of species, including bighorn sheep, mule deer, coyote, and desert tortoise, to cross under these bridges." Page 38 of the MND states that "although no signs of desert tortoises were present, the Project occurs within the species range and may migrate through the Project area." Although the MND includes Mitigation Measure BIO-5, CDFW considers the Mitigation Measure BIO-5 to be insufficient in scope and timing to reduce impacts to desert tortoise to less than significant. CDFW recommends the County revise Mitigation Measure BIO-5 with the following additions in **bold** and removals in ~~strikethrough~~:

Mitigation Measure BIO-5: Presence/Absence Desert Tortoise Survey

Prior to commencing Project activities, a focused survey for desert tortoise shall be conducted by a qualified biologist, according to protocols in Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (USFWS 2019; https://www.fws.gov/sites/default/files/documents/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2019.pdf), during the species' most active periods (April through May or September through October). CDFW recommends working with USFWS and CDFW concurrently to ensure a consistent and adequate approach to planning survey work and that biologists retained to complete desert tortoise protocol-level surveys submit their qualifications to CDFW and USFWS prior to initiation of surveys. If desert tortoise is found to be present, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures.

No more than 14 calendar days prior to start of Project activities and after any pause in Project activities lasting 30 days or more, a qualified biologist shall conduct pre-construction surveys for desert tortoise as described in the USFWS 2019 desert tortoise survey methodology (Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise;

B12

[6] U.S. Fish and Wildlife Service (USFWS). (2011). Revised recovery plan for the Mojave population of the desert tortoise (Gopherus agassizii). https://www.fws.gov/sites/default/files/documents/USFWS.2011.RRP%20for%20the%20Mojave%20Desert%20Tortoise.pdf.

https://www.fws.gov/sites/default/files/documents/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2019.pdf). **Pre-construction surveys shall be completed using perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign within the Project area and 50-foot buffer zone. Pre-activity surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until two negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the surveys shall be submitted to CDFW prior to construction start. If the pre-construction surveys confirm desert tortoise absence, the qualified biologist shall ensure desert tortoise do not enter the Project area. Should desert tortoise presence be confirmed during the survey, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures.** ~~Prior to construction activities, a qualified biologist will perform a presence/absence survey within 100% of project LOD and a 200- foot buffer (or to the property boundary if permission cannot be obtained) for fresh sign of desert tortoise, including living tortoises, tortoise remains, burrows, tracks, scat, or eggshells. The presence/absence survey must be performed between February 15 and October 31. The presence/absence survey is valid for 90 days (or indefinitely if tortoiseproof fencing is installed around the work limits).~~

~~• If fresh sign of desert tortoise is found during the presence/absence survey, a preconstruction survey would be performed within the entire work area. The survey will be conducted from February 15 to June 15 or September 1 to October 31, during different tortoise activity periods (morning and afternoon). Tortoiseproof fencing will be installed around the work limits after any individuals are removed from the work area by a qualified biologist. The tortoise fencing will be maintained throughout the duration of construction activities.~~

~~• If no sign is found, a preconstruction clearance survey would not be required within 90 days of the last survey. If project construction has not started within that 90-day period, a new survey presence/absence survey may be necessary.~~

B12 Cont.

7) CDFW's Lake and Streambed Alteration Program

Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

B13

Page 8 of the MND indicates that "permanent and temporary impacts from the replacement of Fornat Wash Bridge (#56C0099) and East Channel Stubbe Wash Bridge (#56C0101) will require compensatory mitigation for jurisdictional waters. Compensation can be a combination of enhancement, restoration, and/or rehabilitation. Compensation can also occur through the purchase of credits through the Coachella Valley Conservation Commission (CVCC) in lieu fee program or other approved mitigation provider, including federal and state jurisdictional water resources." CDFW determines appropriate compensatory mitigation and other measures to protect the fish and wildlife resources through the Lake and Streamed Alteration Program and after a notification is submitted to CDFW per Fish and Game Code section 1602. Regarding compensatory mitigation, note that the Coachella Valley Conservation Commission's In-Lieu Fee (ILF) Program has been terminated; therefore, fulfillment of compensatory mitigation for impacts to fish and wildlife resources subject to Fish and Game Code section 1600 et seq. through the purchase of credits through CVCC's ILF Program is not an option. Additionally, there may be limited options available to satisfy compensatory mitigation through the purchase of credits through a mitigation bank that has a service area overlapping with the Project. Given the limited options to compensate for impacts to fish and wildlife resources subject to Fish and Game Code section 1600 et seq., CDFW recommends that off-site permittee-responsible mitigation is added as an option in the MND. Although the MND includes Mitigation Measure BIO-4, CDFW recommends the County include the following mitigation measure in a revised MND: B13.1

Mitigation Measure BIO-[C]: CDFW Lake and Streambed Alteration Program

Prior to construction and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, *or* the Project Sponsor should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project. B13.2

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. B13.3

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) B14

CONCLUSIONS

CDFW appreciates the opportunity to comment on the MND to assist the County in identifying and mitigating Project impacts to biological resources. CDFW concludes that the MND does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. CDFW also concludes that the MND lacks sufficient information for a meaningful review of impacts to biological resources, including a complete project description. The CEQA Guidelines indicate that recirculation is required when insufficient information in the MND precludes a meaningful review (§ 15088.5) or when a new significant effect is identified and additional mitigation measures are necessary (§ 15073.5). CDFW recommends that a revised MND, including a complete Project description including detailed rock slope protection plans be recirculated for public comment. CDFW also recommends that revised and additional mitigation measures as described in this letter be added to a revised MND. If the revised MND cannot demonstrate that impacts to biological resources are mitigated to a level that is less than significant, CDFW recommends that an Environmental Impact Report be prepared by the County. B15

CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts. Questions regarding this letter or further coordination should be directed to Jacob Skaggs, Environmental Scientist, at jacob.skaggs@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kim Freeburn
84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

ec:

Heather Brashear, Senior Environmental Scientist (Supervisor), CDFW
Heather.Brashear@Wildlife.ca.gov

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov

Vincent James, U.S. Fish and Wildlife Service
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Peter Satin, Coachella Valley Conservation Commission
psatin@cvag.org

ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

Mitigation Measures	Timing and Methods	Responsible Parties
Mitigation Measure BIO-[A]: Assessment of Biological Resources **Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.**	**Timing**: Prior to Project construction activities. **Methods:** See Mitigation Measure	**Implementation**: County of Riverside **Monitoring and Reporting**: County of Riverside
Mitigation Measure BIO-[B]: CVMSHCP Joint Project Review Process **Prior to Project construction activities, the County of Riverside will participate in the Joint Project Review process for the Railroad Avenue Bridge Replacement Project per CVMSHCP Section 6.6.1.1.**	**Timing**: Prior to Project construction activities. **Methods:** See Mitigation Measure	**Implementation**: County of Riverside **Monitoring and Reporting**: County of Riverside

Mitigation Measure BIO-7: Burrowing Owl Avoidance **Suitable burrowing owl habitat has been confirmed on the Project site and surrounding area; therefore, focused burrowing owl surveys shall be conducted in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG 2012 or most recent version) prior to vegetation removal or ground-disturbing activities. If burrowing owls are detected during the focused surveys, the qualified biologist and Project proponent shall prepare a Burrowing Owl Plan that shall be submitted to CDFW for review and approval prior to commencing Project activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, mitigation, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. If impacts to occupied burrowing owl habitat or burrow cannot be avoided, the Burrowing Owl Plan shall also describe minimization and relocation actions that will be implemented. Proposed implementation of burrow exclusion and closure should only be considered as a last resort, after all other options have been evaluated as exclusion is not in itself an avoidance, minimization, or mitigation method and has the possibility to result in take. If impacts to occupied burrows cannot be avoided, information shall be provided regarding adjacent or nearby suitable habitat available to owls along with proposed relocation actions. The Project proponent shall implement the Burrowing Owl Plan following CDFW and USFWS review and approval.** **Preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (CDFG 2012 or most recent version). Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and USFWS to conduct an impact assessment to develop avoidance, minimization, and mitigation measures to be**	**Timing: Focused surveys:** Prior to the start of Project-related activities. **Pre-construction surveys:** No less than 14 days prior to start of Project-related activities and within 24 hours prior to ground disturbance. **Methods:** See Mitigation Measure	**Implementation**: County of Riverside and Project applicant **Monitoring and Reporting**: County of Riverside

approved by CDFW and USFWS prior to commencing Project activities.		
Mitigation Measure BIO-9: Nesting Birds **Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Pre-construction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Established buffers shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.**	**Timing**: No more than 3 days prior to vegetation removal or ground-disturbing activities. **Methods:** See Mitigation Measure	**Implementation**: County of Riverside **Monitoring and Reporting**: County of Riverside
Mitigation Measure BIO-5: Presence/Absence Desert Tortoise Survey **Prior to commencing Project activities, a focused survey for desert tortoise shall be conducted by a qualified biologist, according to protocols in Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise (USFWS 2019; https://www.fws.gov/sites/default/files/documents/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2019.pdf), during the species' most active periods (April through May or September through October). CDFW recommends working with USFWS and CDFW concurrently to ensure a consistent and adequate approach to**	**Timing**: Prior to commencing Project activities. **Methods:** See Mitigation Measure	**Implementation**: County of Riverside **Monitoring and Reporting**: County of Riverside

planning survey work and that biologists retained to complete desert tortoise protocol-level surveys submit their qualifications to CDFW and USFWS prior to initiation of surveys. If desert tortoise is found to be present, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures. **No more than 14 calendar days prior to start of Project activities and after any pause in Project activities lasting 30 days or more, a qualified biologist shall conduct pre-construction surveys for desert tortoise as described in the USFWS 2019 desert tortoise survey methodology (Preparing for Any Action that May Occur within the Range of the Mojave Desert Tortoise; https://www.fws.gov/sites/default/files/documents/Mojave%20Desert%20Tortoise_Pre-project%20Survey%20Protocol_2019.pdf). Pre-construction surveys shall be completed using perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign within the Project area and 50-foot buffer zone. Pre-activity surveys cannot be combined with other surveys conducted for other species while using the same personnel. Project activities cannot start until two negative results from consecutive surveys using perpendicular survey routes for desert tortoise are documented. Results of the surveys shall be submitted to CDFW prior to construction start. If the pre-construction surveys confirm desert tortoise absence, the qualified biologist shall ensure desert tortoise do not enter the Project area. Should desert tortoise presence be confirmed during the survey, the qualified biologist shall immediately notify CDFW and USFWS to determine appropriate avoidance, minimization, and mitigation measures.**		
Mitigation Measure BIO-[C]: CDFW Lake and Streambed Alteration Program **Prior to construction and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project Sponsor should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.**	**Timing**: Prior to construction and issuance of any grading permit. **Methods:** See Mitigation Measure	**Implementation**: Project applicant **Monitoring and Reporting**: County of Riverside

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment B1:

The commenter expresses concern that the IS/MND has not adequately identified and disclosed the Project's impacts on biological resources and whether those impacts are reduced to less than significant. The commenter concludes that the IS/MND lacks sufficient information to facilitate a meaningful review, including a detailed description of rock slope protection. The commenter requests additional information and analyses to be added to a revised IS/MND, along with avoidance, minimization, and mitigation measures that avoid or reduce impacts to less than significant.

Response:

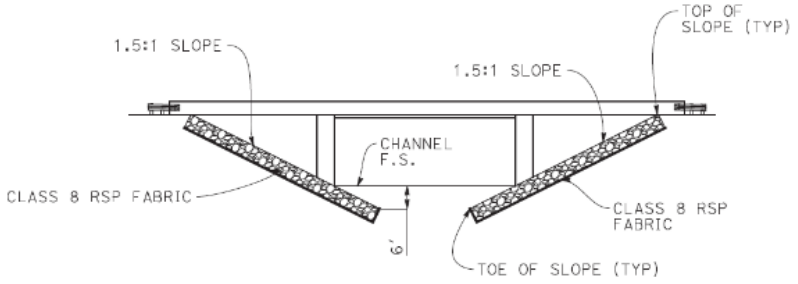
This introductory comment has been noted. Detailed comments, recommendations, and requests are addressed in the responses below.

Comment B2:

The commenter states that they have identified gaps in information related to the Project description in the IS/MND including a detailed description of rock slope protection infrastructure that is proposed beneath and south of the proposed bridges. The commenter requests that the IS/MND is revised to include additional information on the locations of the proposed rock slope protection and if it will be grouted or ungrouted.

Response:

The proposed Project would replace the existing 2-lane timber bridges with new 2-lane modern concrete bridges. The proposed replacement bridges would be single-span, precast/prestressed concrete slabs with driven steel piles. Additionally, the ungrouted riprap would be placed at the southeast and southwest corners of the bridges and would extend six feet below the channel bottom. Other than the local corners, the channels would remain earthen. The abutments below the bridge have no riprap as the footings are placed deep enough to accommodate the hydraulic scour. The design requires Caltrans Class 8 RSP fabric between the native soil and free draining aggregate (rocks) to protect the channel slope abutments and bridge piers.



RIPRAP SIZING			
SITE	THICKNESS	CLASS	6" BEDDING
FORNAT WASH	2.5 FT	IV	SAND
E. CHANNEL STUBBE WASH	4 FT	VIII	1" ROCK

RIPRAP DETAILS
FORNAT WASH & E. CHANNEL STUBBE WASH
NO SCALE

Comment B3:

The Commenter is concerned that the mitigation measures proposed in the IS/MND are not adequate to avoid or reduce impacts to biological resources to below a level of significance. The Commenter recommends adding mitigation measures for an assessment of biological resources and the CVMSHCP Joint Project Review process, as well as revising the mitigation measures for burrowing owl, nesting birds, desert tortoise, and compensatory mitigation for replacement/restoration of jurisdictional resources.

Response:

The Project is a Covered Activity per Section 7.3.1.1 of the CVMHSCP as an operations and maintenance (O&M) activity. In April and September of 2019 the CVCC confirmed that O&M activities for Railroad Avenue is a Covered Activity per Section 7.3.1 of the CVMHSCP. The CVCC reconfirmed the Project as a Covered Activity in a public comment letter dated July 21, 2023 (see Comment G1). Mitigation measures for environmental impacts from any such activities have already been accounted for in the County's existing obligations under the CVMSHCP. This specific facility is not subject to any avoidance, minimization, or mitigation measures as contemplated by the CVMSHCP. However, the Project has included measures **BIO-1** through **BIO-9** to further ensure impacts on biological resources are less than significant. The full assessment of the proposed Project's potential impacts to biological resources was completed and documented in the NES(MI), which can be found on the County's website at https://rcprojects.org/railroadbridges. Furthermore, the Joint Project Review (JPR) process is not required for facilities subject to Covered Activities, inclusive of bridge O&M.

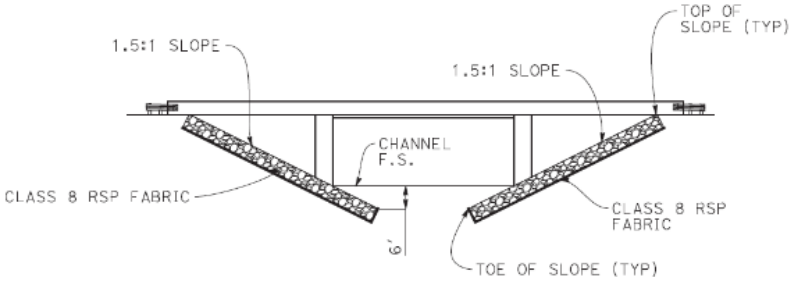
Comment B4:

The Commenter states that the IS/MND lacks details regarding proposed rock slope protection including its dimensions and locations (i.e., how far into the current ephemeral stream habitat rock slope protection will extend and at what depth) and the type of riprap to be used in rock

slope protection including if it will be grouted or ungrouted. The Commenter states that the IS/MND and its supporting documents also lack information on any riprap, concrete, or other materials that will be installed across the remaining central sections of the ephemeral streams (between the proposed rock slope protection installed beneath both sides of the current ephemeral streams). The Commenter recommends that the County revise the IS/MND to include detailed design plans and recirculate the IS/MND to CDFW and the public for review.

Response:

The channel bottoms would remain earthen and no rock riprap is planned at grade within the invert of the channel. The rock riprap would be placed along the abutments and would continue sub-grade at the same 1.5:1 slope to a depth sufficient to prevent scour. As depicted in the figure below, the toe of the slope and riprap would be six feet below the channel bottom. These preliminary design plans were used as the basis for the environmental analysis and provided sufficient details to understand potential impacts. During final design, design details will be further refined and coordination with CDFW will occur.



RIPRAP SIZING			
SITE	THICKNESS	CLASS	6" BEDDING
FORNAT WASH	2.5 FT	IV	SAND
E. CHANNEL STUBBE WASH	4 FT	VIII	1" ROCK

RIPRAP DETAILS
FORNAT WASH & E. CHANNEL STUBBE WASH
NO SCALE

Sufficient design information was available to conduct a meaningful review of the Project effects, and no new significant effects have been identified or brought forward through the public review; therefore, recirculation of the IS/MND is not warranted.

Comment B5:

The commenter recommends that a complete, recent inventory of rare, threatened, and other sensitive species located within the Project area and within offsite areas with the potential to be affected be conducted. The commenter also recommends that the County revise the IS/MND to include an analysis of direct, indirect, and cumulative impacts to biological resources.

Response:

Surveys for special-status plants were completed in 2017 and surveys for wildlife were completed in 2019. Precipitation in late 2016/early 2017, which preceded the 2017 field survey,

was well above average and provided optimal conditions for plant growth and food abundance for wildlife. Similarly, the rainy season from late 2018/early 2019, which preceded the 2019 field survey, was above average. These studies were adequate and sufficient to analyze impacts of the Project on sensitive biological resources. Measures **BIO-5**, **BIO-7**, **BIO-8**, and **BIO-9** will provide additional survey information prior to construction regarding threatened, endangered, and other sensitive species including desert tortoise and burrowing owl to avoid unintentional impacts to these species. Furthermore, Measures **BIO-5, BIO-7**, and **BIO-9** were revised in the Final IS/MND to incorporate CDFW's recommended language and detailed protocol to protect sensitive species.

A discussion on direct and indirect impacts to biological resources can be found in Section 3.4, *Biological Resources, Impact (a), of the Final IS/MND.* A discussion on cumulative impacts to biological resources can be found in Section 3.21, *Mandatory Finding of Significance*, of the Final IS/MND.

Comment B6:

The commenter recommends revised mitigation measures to be included in the IS/MND. The commenter suggests Mitigation Measure BIO-[A]: Assessment of Biological Resources, requiring a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project area and within offsite areas with the potential to be affected.

Response:

Baseline studies consisting of literature searches, natural resource database reviews, field surveys, and a reconnaissance-level biological study of the Project impact area and buffer were completed for the Project and provided sufficient information to analyze impacts to rare, threatened, endangered, and other sensitive species. These studies satisfy federal, state and local regulatory requirements for determining the biological effects of the Project, including the requirement to show consistency with the CVMSHCP.

Additionally, consultation with the CVCC occurred to ensure compliance with the CVMSHCP. In April of 2019 and September of 2019 during consultation with the CVCC and in a public comment to the IS/MND dated July 21, 2023, the CVCC confirmed the Project as a Covered Activity under the CVMSHCP. The CVCC indicated that operation and maintenance activities for Railroad Avenue are listed as a Covered Activity in Section 7.3.1 of the CVMSHCP and that mitigation measures for environmental impacts from any such activities have already been accounted for in the County's existing obligations under the CVMSHCP. This specific facility is not subject to any avoidance, minimization, and mitigation measures as contemplated by the CVMSHCP. However, the Project has included measures **BIO-1** through **BIO-9** to further ensure impacts on biological resources are less than significant. Section 3.4 of the Final IS/MND references the measures that are being implemented to avoid, minimize and/or mitigate potential biological impacts (See Tables 6 and 7).

Comment B7:

The commenter states that there are several studies that have been completed on the use of the two underpasses associated with the Project and other underpasses in the area regarding their function as biological corridors. The commenter recommends that the IS/MND be revised to include a discussion of how the Project impacts these two underpasses and their current functions

as biological corridors taking into consideration the findings of these studies. The commenter states that these studies should be used to inform appropriate avoidance, minimization, and mitigation measures for the Project.

Response:

A review of two of the three referenced studies was completed. The third study, Myers, S.J., S. Ogg, and L.F., LaPre. 1996, *Potential wildlife corridors in the San Gorgonio Pass: Initial Report* prepared for the Wildlands Conservancy by Tierra Madre Consultants, Inc. could not be located. The following are key takeaways from the studies reviewed:

- Based on the review of the Murphy-Mariscal et al. (2015) study, it was noted that structural attributes of the studied underpasses had a minor influence on use by most of the species using highway underpass structures and that minimizing human disturbance and providing a range of underpass structures to support many wildlife species are most important in enhancing connectivity. The authors suggested providing a wide range of underpass structures to support a diversity of wildlife species and to use modifications to reduce human disturbance.
- In the Barrows et al. (2011) study, the Palm Springs pocket mouse was used as a study species to evaluate dispersal patterns in linkages. It was determined that Palm Springs pocket mouse populations were dwelling within wildlife corridors, and thereby maintained sustainable populations within the corridors. The study notes that the corridor functions as "live-in" habitat for special-status species, in this case a species covered by the CVMHSCP, which is the definition of live-in habitat within a wildlife linkage corridor.

The type and height of the underpass structures (i.e. two lane bridge and ranging in height from approximately 3 to 13 feet from channel bottom to underside of bridge deck) are intended to be similar post-Project construction as pre-Project construction. As noted in Murphy-Mariscal et al. (2015) study, having a wide variety of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10, and reducing human disturbance, were more important than structural attributes of the underpasses, which had a minor influence on use by most of the species using highway underpass structures. The Project would not increase capacity, nor is it anticipated that the Project would result in an increase in human disturbance within the area.

Comment B8:

The commenter has concerns regarding the Project being considered an O&M Activity and not participating in the JPR process of the CVMSHCP. The commenter recommends that the County start a new consultation with current staff at the CVCC, CDFW, and the USFWS to discuss the County's obligations under the CVMSHCP and applicable requirements to comply with the CVMSHCP. The commenter also requests that per Section 6.6.1 of the CVMSHCP that the County provide a detailed analysis of how the Project is consistent with the CVMSHCP. The commenter states that they do not consider complete replacement of two bridges a Covered Operation, Maintenance, and Safety Activities (CVMSHCP Section 7.3.1.1) because it is not limited to deck and rail replacement and/or column replacement. The commenter recommends that because the Project is located in the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area and full bridge replacement is not listed as an Operation and

Maintenance Activity per CVMSHCP Section 7.3.1.1, that the County participate in the JPR process as outlined in CVMSHCP Section 6.6.1.1.

Response:

The CVCC confirmed in April and September of 2019, and reconfirmed in a comment letter to the IS/MND dated July 21, 2023 (see Comment G1), that the Project is a Covered Activity per Section 7.3.1.1 of the CVMHSCP as an O&M activity. During additional consultation conducted between February and May of 2024, the CVCC indicated that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance, as described in Section 7.3.1.1 of the CVMSHCP (see letter dated May 22, 2024, Appendix D).

Additionally, during a meeting with the CVCC in May 2024, the CVCC noted that the Project is considered an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring. As noted in Comment B8 above, the Project is in the Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area. In both Conservation Areas, Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge O&M, which are not required to undergo the JPR process. However, they are subject to consultation with the CVCC to ensure viability of habitat connectivity. During the May 2024 meeting, the CVCC reviewed the preliminary design plans and stated that they did not anticipate the corridors would be adversely impacted by the proposed O&M activities. The CVCC will be provided an additional opportunity to review the Project design plans prior to their finalization per their request. Furthermore, the CVCC stated that no further agency coordination is required by the County related to CVMSHCP consistency.

An analysis of the Project's consistency with the CVMSHCP is included in Section 4.1.2, *Discussion of CVMSHCP Biological Corridors*, and Section 5.9, *Coachella Valley Multiple Species Habitat Conservation Plan* of the NES(MI). The NES(MI) can be found on the County's website at https://rcprojects.org/railroadbridges . Furthermore, Section 3.4, Biological Resources, Impact (f) of this Final IS/MND has been updated to include the full consistency analysis found in the NES(MI).

Comment B9:

The commenter states that the IS/MND lacks a discussion of how the Project is consistent with the Conservation Objectives and Required Measures of the Cabazon Conservation Area and the Snow Creek/Windy Point Conservation Area. The commenter recommends that, in addition to participating in the JPR process, the IS/MND be revised to include a discussion of how the Project is consistent with the Objectives and Required Measures of the two Conservation Areas.

Response:

An analysis of the Project's consistency with the CVMSHCP is included in Section 5.9, *Coachella Valley Multiple Species Habitat Conservation Plan* of the Natural Environment Study (Minimal Impact) [NES(MI)]. The NES(MI) can be found on the County's website at https://rcprojects.org/railroadbridges. Furthermore, Section 3.4, *Biological Resources, Impact (f)* of this Final IS/MND has been updated to include the full consistency analysis found in the NES(MI).

Comment B9.1:

Commenter states that for the bridge over Fornat Wash the Conservation Objective particularly relevant to the Project includes CVMSHCP Section 4.3.1, Conservation Objective 5 – to maintain the current capacity for fluvial (water-borne) sand transport along 4,496 acres of the San Gorgonio River and its tributaries.

Response:

As shown in Figure 5 of the Final IS/MND, the portion of Fornat Wash within the Project area is not in a fluvial sand transport area. Furthermore, Fornat Wash would be maintained with an earthen bottom, and have the same capacity for fluvial sand transport as existing conditions.

Comment B9.2:

The commenter states that for the bridge over Fornat Wash the Conservation Objective particularly relevant to the Project includes CVMSHCP Section 4.3.1, Conservation Objective 6 – to maintain functional Biological Corridors under I-10 by conserving at least 631 acres in the Fornat Wash Biological Corridor to maintain ecosystem function for Covered Species.

Response:

All impacts to the biological corridor through Fornat Wash would be temporary and limited to Project construction. Project staging would occur within the existing paved roadway. During operation of the Project, land use and maintenance of the Fornat Wash undercrossing would be the same as existing conditions, ensuring that no changes to the channel would occur that might affect its ability to continue functioning as a wildlife corridor. The earthen bottom would be maintained and the existing wooden support structure, which includes interior piers, would be replaced with stronger materials that do not require bridge platform pier support, further reducing potential impediments to wildlife movement. Riprap used to prevent bridge scour would be ungrouted and only extend far enough to prevent scour, but otherwise would not line the channel bottom maintaining the channel's natural condition.

Comment B9.3:

Commenter states that for the bridge over Fornat Wash the Required Measures particularly relevant to the Project include CVMSHCP Section 4.3.1, Required Measure 1 – conservation of the identified fluvial sand transport process areas will be achieved through design features during development proposal applications (application of the general plan land use designation and policies).

Response:

The portion of Fornat Wash within the Project area is not in a fluvial sand transport area. Furthermore, Fornat Wash would be maintained with an earthen bottom, and have the same capacity for fluvial sand transport as existing conditions

Comment B9.4:

Commenter states that for the bridge over Fornat Wash the Required Measures particularly relevant to the Project include CVMSHCP Section 4.3.1, Required Measure 2 – the culvert conveying Fornat Wash under I-10 will be maintained by Caltrans at no less than its current size, with a soft-bottom, to maintain current levels of sand transport and wildlife movement under I-

10. Commenter states that they consider "soft-bottom" to mean bottomless and without the installation of any infrastructure such as riprap, concrete, or other materials. Commenter states that grouted riprap, concrete, and impermeable materials within the bed and banks of a stream can permanently limit the ability of deep-rooted perennial plants to occupy the Project area. Commenter states that the Required Measure 2 would apply to the Project because the County is proposing the Project "in cooperation with the California Department of Transportation."

Response:

This measure is not applicable to the Project because the Project is approximately 0.2 miles away from the portion of Fornat Wash under I-10. Therefore, the Project would not affect the portion of Fornat Wash under I-10 nor impact the State Highway System. However, the Project has been designed to maintain a soft earthen bottom within Fornat Wash under Railroad Avenue. The proposed Project would install rock slope protection at the abutments of the bridge to address future scour issues. Ungrouted riprap is proposed at a 1.5:1 slope to a depth of six feet below the channel surface.

Comment B9.5:

Commenter states that for the bridge over Fornat Wash Required Measures particularly relevant to the Project include CVMSHCP Section 4.3.1, Required Measure 3 – the Permittees will comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5 in areas outside of the fluvial sand transport area.

Response:

The Project occurs outside of the Essential Ecological Process area. Measures BIO-2 and BIO-5 through BIO-7 would be implemented for compliance with Required Measure 3 and CVMSHCP Volume I, Section 4.4 and 4.5. Please see Section 3.4, *Biological Resources*, Impact (f) of the Final IS/MND or Section 5.9 of the NES(MI), which is available on the County's website at https://rcprojects.org/railroadbridges for a full discussion of CVMSHCP consistency analysis.

Comment B9.6:

Commenter states that for the bridge constructed within the Snow Creek/Windy Point Conservation Area the Conservation Objectives and Required Measures particularly relevant to the Project include CVMSHCP Section 4.3.3, Conservation Objective 8 – to maintain functional biological corridors and linkages under I-10 and Highway 111 by conserving at least 415 acres of identified Biological Corridor in the unincorporated area of the Conservation Area and at least 247 acres of Biological Corridor in the City of Palm Springs' portion and to maintain habitat connectivity for the Stubbe Canyon Wash Biological Corridor south of I-10 for desert tortoise, Coachella Valley round-tailed ground squirrel, and Palm Spring pocket mouse and to maintain ecosystem function for Covered Species.

Response:

The Project is located approximately 0.2 miles away from the I-10 and therefore does not include changes to conserved habitat associated with I-10. The area under I-10 is an access easement for maintenance purposes; therefore, this area is not part of the CVMSHCP. All impacts to the Biological Corridor under the East Channel Stubbe Wash bridge would be temporary and limited

to construction of the Project. During Project operations, land use and maintenance of the East Channel Stubbe Wash undercrossing would remain the same as existing conditions, ensuring that no changes to the channel would occur that might affect its ability to maintain connectivity for desert tortoise, Coachella Valley round-tailed ground squirrel, and Palm Springs pocket mouse, as well as ecosystem function for Covered Species.

Comment B9.7:

Commenter states that CVMSHCP Section 4.3.3, Required Measure 1 (as bridge is over the San Gorgonio River) and Required Measure 2 (as the project is in cooperation with Caltrans) apply to the project. CVMSHCP Section 4.3.3 Required Measures 1 and 2 are as follows:

"1. The culvert under Highway 111 west of Windy Point and the bridge over the San Gorgonio River at Windy Point will be maintained by Caltrans at no less than their current size, with soft-bottoms, to maintain current levels of sand transport and potential wildlife movement under Highway 111.

2. The Permittees shall comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5."

Response:

The Project is over 6.5 miles northwest from the San Gorgonio River at Windy Point; therefore, Measure 1 of Section 4.3.3 of the CVMSHCP does not apply to the Project.

The Project will comply with all applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines described in Section 4.5 of the CVMSHCP. Additionally, the Project is consistent with Measure 2 of Section 4.3.3. in the CVMSHCP. Please see Section 5.9 of the NES and Section 3.4 of the Final IS/MND for the full discussion of CVMSHCP consistency analysis.

Comment B9.8:

Commenter states that for the bridge constructed within the Snow Creek/Windy Point Conservation Area the Required Measures particularly relevant to the Project include CVMSHCP Section 4.3.3, Required Measure 2 - the Permittees will comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5.

Response:

As described in Section 3.4, *Biological Resources*, Impact (f) of the Final IS/MND, measures **BIO-2** and **BIO-5** through **BIO-7** have been incorporated to address CVMSHCP Volume I, Section 4.4 and Section 4.5.

Comment B9.9:

Commenter recommends that the IS/MND is revised to reflect the Project's requirements to comply with the CVMSHP including participation in the JPR process, complying with the Conservation Objectives and Required Measures of the Cabazon Conservation Area and Snow

Creek/Windy Point Conservation Area, ensuring compliance with required avoidance, minimization, and mitigation measures in CVMSHCP Section 4.5 and complying with Land Use Adjacency Guidelines in CVMSHCP Section 4.5.

Response:

Section 3.4, *Biological Resources*, response to Impact (f), of the Final IS/MND, was revised to include a discussion regarding the Project's requirements to comply with the CVMSHCP JPR process, conservation objectives and required measures.

Comment B9.10:

Commenter recommends adding Mitigation Measure BIO-[B] per CVMSHCP Section 6.6.1.1 to a revised IS/MND to support the County in fulfilling its obligations as a local permittee under the CVMSHCP.

Response:

The CVCC confirmed in April and September of 2019, and reconfirmed in a comment letter to the IS/MND dated July 21, 2023 (see Comment G1), that the Project is a Covered Activity per Section 7.3.1.1 of the CVMHSCP as an O&M activity. During additional consultation conducted between February and May of 2024, the CVCC reconfirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance, as described in Section 7.3.1.1. of the CVMSHCP (see letter dated May 22, 2024, Appendix D). Additionally, during a meeting with the CVCC in May 2024, the CVCC noted that the Project is considered an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring. The proposed O&M activity has already been accounted for in the County's existing obligations under the CVMSHCP. The Project is consistent with the CVMSHCP and the County (permittee) will comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5. Please see Section 5.9 of the NES(MI) (available on the County's website at https://rcprojects.org/railroadbridges) and Section 3.4 of the Final IS/MND for the full discussion of the CVMSHCP consistency analysis. In addition, the Project has included measures **BIO-1** through **BIO-9** to further ensure impacts on biological resources are less than significant.

Comment B10:

Commenter states that because surveys for special status species were last conducted in 2017 and 2019 and are outdated, the Final IS/MND should be revised to include results of recent focused surveys for burrowing owl and an impact assessment following the guidelines in the Staff Report on Burrowing Owl Mitigation (CDFG 2012). Commenter considers Mitigation Measure BIO-7 for burrowing owl to be inadequate in scope and timing to reduce impacts to less than significant and recommends the measure is revised per the comment.

Response:

Surveys for special-status plants were completed in 2017 and wildlife surveys were conducted in 2019, just prior to the completion of the Natural Environment Study (Minimal Impacts) in

February of 2020. These surveys were adequate and sufficient to analyze impacts of the Project on sensitive biological resources. Measures **BIO-5**, **BIO-7**, **BIO-8**, and **BIO-9** will provide additional survey information prior to construction regarding rare, threatened, and other sensitive species, including desert tortoise and burrowing owl to avoid unintentional impacts to these species. Measure **BIO-7** has been revised to be consistent with the California Department of Fish and Game (CDFG) Staff Report on Burrowing Owls (2012) and the recommendations in the comment. Because focused burrowing owl surveys were already conducted in 2019 and no burrowing owls or burrowing owl sign was observed, there is no requirement to complete additional focused burrowing owl surveys. Further initial study surveys were not recommended as part of measure **BIO-7**.

Comment B11:

Commenter states that Mitigation Measure **BIO-9** is insufficient in scope and timing to reduce impacts on nesting birds to less than significant and recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting on-site.

Response:

Revisions have been made to **BIO-9** to provide clarification on survey timing and protection controls, use of avoidance methods to reduce potential nest predation as a result of surveys and monitoring, use of 300 foot (for passerines) and 500 foot (for raptors) buffers, and daily monitoring for nesting behavioral modifications induced by construction noise or activities. Revised text for **BIO-9** has been included in the Final IS/MND.

Comment B12:

Commenter states that Mitigation Measure BIO-5 is insufficient in scope and timing to reduce the impacts on desert tortoise to less than significant and recommends that BIO-5 be revised per the comment. Commenter includes the revised text for Mitigation Measure BIO-5: Presence/Absence Desert Tortoise Survey.

Response:

BIO-5 has been revised to be consistent with Chapter 6 of the USFWS 2009 Desert Tortoise Field Manual (Desert Tortoise Clearance Surveys), which is appropriate for this activity. **BIO-5** is now sufficient to reduce impacts on desert tortoise to less than significant. Revised text for **BIO-5** has been included in the Final IS/MND.

Comment B13:

Commenter cites Fish and Game Code section 1602, which requires an entity to notify CDFW prior to commencing any activity that may substantially divert or obstruct the natural flow of any river, stream or lake; or deposit debris, waste, or other materials that could pass into any river, stream or lake.

Response:

Comment noted. Applications for permits (USACE 404, RWQCB 401, and CDFW 1602) will be submitted following adoption of the Final IS/MND. See revised measure BIO-4.

Comment B13.1:

Commenter notes that the Coachella Valley Conservation Commission (CVCC) In-lieu fee program (ILFP) has been terminated, therefore the purchase of credits through the CVCC's ILFP is not an option. Commenter also notes that there may be limited options to satisfy compensatory mitigation through the purchase of credits through a mitigation bank that has a service area overlapping the Project. Commenter states that due to the limited options to compensate for impacts for resources subject to Fish and Game Code section 1600 et seq., CDFW recommends that off-site permittee-responsible mitigation is added as an option.

Response:

Comment noted. Measure **BIO-4** has been revised to include permittee-responsible on- or off-site mitigation as an option to compensate for impacts to resources subject to Fish and Game Code Section 1600 et seq. A required minimum ratio of 1:1 for permanent replacement mitigation was also included.

Comment B13.2:

Commenter recommends that although the IS/MND includes Mitigation Measure BIO-4, they recommend adding Mitigation Measure BIO-[C] in a revised IS/MND.

Response:

Comment noted. Applications for permits (USACE 404, RWQCB 401, and CDFW 1602) will be submitted following adoption of the Final IS/MND. See revised measure BIO-4.

Comment B13.3:

Commenter states that it is a California Environmental Quality Act (CEQA) requirement that special status species and natural communities detected during Project surveys be incorporated into the California Natural Diversity Database (CNDDB).

Response:

Comment noted. Only one special-status species, loggerhead shrike, was observed and a CNDDB record was submitted on February 8th, 2024.

Comment B14:

Commenter notes that the Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination (NOD) by the Lead Agency. Payment of the environmental document filing fee is required for the underlying Project approval to be operative, vested, and final.

Response:

Comment noted. The environmental document filing fees will be paid by the Lead Agency upon filing of the NOD.

Comment B15:

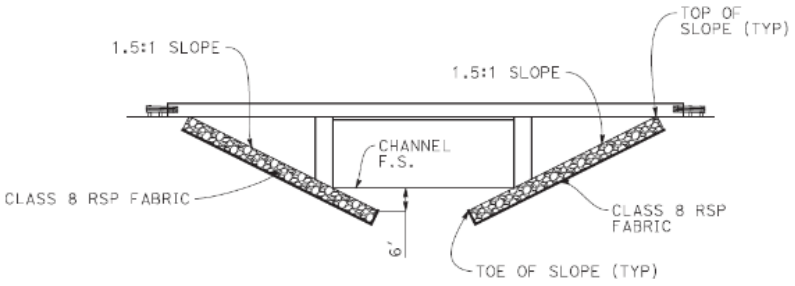
Commenter states that the IS/MND does not adequately identify or mitigate the Project's significant, or potentially significant, impacts on biological resources. Commenter also states that

the IS/MND lacks sufficient information for a review of impacts on biological resources, including a complete project description. Commenter states that per CEQA Guidelines, recirculation is required when insufficient information in the IS/MND precludes a meaningful review or when a new significant effect is identified, and additional mitigation measures are necessary. Commenter recommends that a revised IS/MND, including a complete Project description including detailed rock slope protection plans, be recirculated for public comment. Commenter also recommends that revised and additional mitigation measures as described be added to the revised IS/MND. Commenter states that if the revised IS/MND cannot demonstrate that impacts to biological resources are mitigated to a level that is less than significant, then an Environmental Impact Report be prepared.

Response:

Please refer to Section 3.4 of the Final IS/MND which analyzes and identifies potential impacts associated with the Project. The analysis was based on studies consisting of literature searches, natural resource database reviews, field surveys, and a reconnaissance-level study of the Project impact area. In addition, surveys for special-status plants were completed in 2017 and surveys for wildlife were completed in 2019. These studies and surveys were conducted during a normal year under typical conditions and are sufficient to analyze impacts on biological resources. Due to the project's location in a desert environment, the baseline conditions change very slowly and are generally relatively static for long periods of time, which is inclusive of the time between 2017 and 2025.

Section 2, subsection 8 of the IS/MND provides a complete project description that includes all components of the Project and proposed activities. As depicted in the figure below, no rock riprap is planned at grade within the invert of the channel. The channel bottom would remain earthen. The rock riprap would be placed along the abutments and would continue sub-grade at the same 1.5:1 slope to a depth sufficient to prevent scour. The toe of the slope and riprap would be six feet below the channel bottom. These design plans were used as the basis for the environmental analysis and were sufficient to understand potential impacts. During final design, these design details will be further refined.



RIPRAP SIZING			
SITE	THICKNESS	CLASS	6" BEDDING
FORNAT WASH	2.5 FT	IV	SAND
E. CHANNEL STUBBE WASH	4 FT	VIII	1" ROCK

RIPRAP DETAILS
FORNAT WASH & E. CHANNEL STUBBE WASH
NO SCALE

Furthermore, the Project is consistent with the CVMSHCP. The Project is a Covered Activity per Section 7.3.1.1 of the CVMHSCP as an O&M activity inclusive of bridge operation and maintenance. During additional consultation conducted between February and May of 2024, the CVCC reconfirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance, as described in Section 7.3.1.1. of the CVMSHCP (see letter dated May 22, 2024, Appendix D). During a meeting with the CVCC in May 2024, the CVCC noted that the Project is consider an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring. The proposed O&M activity has already been accounted for in the County's existing obligations under the CVMSHCP. The Project is consistent with the CVMSHCP and the County (permittee) will comply with applicable avoidance, minimization, and mitigation measures described in Section 4.4 and the Land Use Adjacency Guidelines as described in Section 4.5.

Please see Section 5.9 of the NES(MI) (available on the County's website at https://rcprojects.org/railroadbridges) and Section 3.4 of the Final IS/MND for the full discussion of the CVMSHCP consistency analysis. In addition, the Project has included measures **BIO-1** through **BIO-9** to further ensure impacts on biological resources are less than significant.

As described in Section 15073.5 of the CEQA Guidelines, a lead agency must recirculate a negative declaration when the document is substantially revised after public notice of its availability. However, the revisions to this Final IS/MND are not considered substantial because no new significant environmental impacts are identified and all new information added merely clarifies or amplifies analysis presented in this Final IS/MND. Sufficient information was available to conduct a meaningful review of the Project effects and no new significant effects have been identified or brought forward through the public review process. The Project is required to comply with applicable avoidance, minimization, and mitigation measures described in Sections 4.4 and 4.5 of the CVMSHCP. In addition, the Project will implement measures

BIO-1 through **BIO-9** that fully address potential impacts on biological resources. No additional measures are necessary to fully mitigate the effects of the project on biological resources; therefore, recirculation of the IS/MND is not warranted.

Regional Agency Comments

Comment C – Riverside County Flood Control and Water Conservation District (July 6, 2023)

PUBLIC NOTICE

Notice of Availability of a Draft Initial Study and Intent to Adopt Proposed Mitigated Negative Declaration

Railroad Avenue Bridge Replacement Project

PUBLIC INFORMATION MEETING
Date: July 12, 2023
Time: 6:00 – 7:00 pm
Held virtually via Zoom. * For details, please visit the project website:
https://rcprojects.org/railroadbridges
*The meeting will be held virtually using Zoom and will be accessible via computer or other devices with internet connection. A current version of Zoom is recommended to access the virtual meeting.

WHAT IS BEING PLANNED? The County of Riverside Transportation Department (County) proposes to replace two existing, structurally deficient timber bridges over Fornat Wash and East Channel Stubbe Wash along Railroad Avenue. The new bridges would be in the same location and would replace the existing timber bridges with new modern concrete bridges. The bridges are being replaced so that the roadway can meet current vehicle load and safety standards. Construction is anticipated to take six months per bridge. During construction, a Traffic Management Plan would be prepared to address closures of the road.

WHY THIS PUBLIC NOTICE? The County, as Lead Agency under the California Environmental Quality Act (CEQA), has studied the proposed project and concluded that it would not significantly affect the environment. The report detailing this finding is called an Initial Study. This notice serves to advertise the availability of the Draft Initial Study and your opportunity to read and comment on it, as well as the opportunity to attend the public meeting as advertised in this notice. The Riverside County Board of Supervisors will consider approval of the project and adoption of the Mitigated Negative Declaration (MND) for the project after July 27, 2023.

WHAT'S AVAILABLE? The Draft Initial Study with Proposed MND for the proposed project will be available beginning June 28, 2023. This document will be available for 30 days from June 28, 2023 until July 27, 2023. The document will be available for review at the following locations:

- County of Riverside Transportation Department, 3525 14th Street, Riverside, CA 92501
- Cabazon Public Library, 50425 Carmen Ave, Cabazon, CA 92230 (During normal library hours)
- https://rcprojects.org/railroadbridges

WHERE YOU COME IN Please submit your comments on the Initial Study in writing or by email no later than July 27, 2023, to Frances Segovia, Riverside County Transportation Department, 3525 14th Street, Riverside, CA 92501. Comments will be accepted beginning June 28, 2023. Based on study findings, the County has determined that the proposed project will not have a significant effect on the environment because potential effects would be mitigated to a less than significant level with incorporation of mitigation measures. Potentially significant impacts for which mitigation measures were incorporated include Biological Resources. Pursuant to Section 15072(g)(5) of the CEQA Guidelines, it has been determined that the project footprint is not identified on any of the lists enumerated under Section 65962.5 of the California Government Code pertaining to hazardous waste. Your written comments will be considered in the decision on the project and will be forwarded to the Board of Supervisors before action is taken on the project. Notice of said decision will be mailed to any person requesting notification. No decision will be taken until after the review is complete.

CONTACT For more information about this project or to receive a copy of the Draft Initial Study with Proposed Mitigated Negative Declaration, please contact Frances Segovia, Senior Transportation Planner, Riverside County Transportation Department, at (951) 955-1646 or by email at fsegovia@rivco.org. In compliance with the Americans with Disabilities Act (ADA), persons with disabilities may request reasonable accommodations, including auxiliary aids and services at no cost, to participate in the meeting by contacting the individual noted above at least three (3) business days before the scheduled event. This document is available in alternate formats upon request.

From: Elhaddad, Hilal
Sent: Wednesday, July 26, 2023 2:42 PM
To: Segovia, Frances
Cc: McNeill, Amy; Cornelius, William; McKinney, Elsa
Subject: Railroad Avenue Bridge Replacement Project
Attachments: Location+Hydraulic+Study+and+Summary+Floodplain+Encroachment+Report.pdf; District Comments - November 2019.pdf; FS005, San Gorgonio River and Tributaries, USACE, October 1974.pdf

Hi Frances,

Thanks for sharing the submittal link with us to review.

The District reviewed this project back in 2019 and offered few comments (see attached pdf). We also now have additional comments about the recent submittal using the link (https://rcprojects.org/railroadbridges) you provided.

1. See attached report with redline comments.
2. The existing flowrates used and referenced were from Caltran's studies but it is highly likely that the existing FEMA floodplain limits are based on the San Gorgonio Special Study Floodplain. The floodplain limits between the special study and FEMA's are similar. The San Gorgonio Special Study Floodplain has a higher a 100-year flowrate of 7,000 cfs for this reach.
3. Submittal is missing a pre and post floodplain analysis to confirm the new bridge design's impact to the floodplain and whether the project will trigger a FEMA LOMR submittal or not. This is very important due to the fact that the County gets audited by FEMA every 5 years during a Community Assistance Visit (due 2024 May) during which FEMA will review recent improvement within the floodplain and determine if a LOMR should have been processed.
4. Updated Hec-Ras electronic files were not included online for us to review.
5. Detailed bridge plans were not included. Bridges need to be include in the Hec-Ras model to determine impact to the floodplain. For example, the new trapezoidal cross section area without piers may have additional conveyance capacity and potentially change the limits of the floodplain both upstream and downstream.

I hope this helps. Feel free to reach out to me if you have questions or comments.

Hilal ElHaddad, M.S., P.E., CFM | Engineering Project Manager
Floodplain Management Section
RIVERSIDE COUNTY FLOOD CONTROL | 1995 Market Street | Riverside, CA 92501
Office: 951.955.1265 | **E-mail:** haelhadd@rivco.org
Mon-Thurs 6:30AM-5:00PM

From: Segovia, Frances <FSEGOVIA@RIVCO.ORG>
Sent: Monday, July 17, 2023 10:24 AM
To: McNeill, Amy <ammcneil@RIVCO.ORG>
Cc: Cornelius, William <wmcornel@RIVCO.ORG>; Elhaddad, Hilal <haelhadd@RIVCO.ORG>; McKinney, Elsa <EMcKinne@rivco.org>
Subject: RE: Railroad Avenue Bridge Replacement Project

1

C1
C2
C3
C4
C5
C6

Good morning Amy,

Thank you for your input. The Location Hydraulic Study and Summary Floodplain Encroachment Report are available for download on the project website, https://rcprojects.org/railroadbridges .

Please let me know if there are additional comments after your team reviews the reports; the comment period ends July 27.

Frances Segovia
Senior Transportation Planner
Riverside County Transportation Department- Environmental Division
(951) 955-1646
fsegovia@rivco.org

From: McNeill, Amy <ammcneil@RIVCO.ORG>
Sent: Saturday, July 15, 2023 1:14 PM
To: Segovia, Frances <FSEGOVIA@RIVCO.ORG>
Cc: Cornelius, William <wmcornel@RIVCO.ORG>; Elhaddad, Hilal <haelhadd@RIVCO.ORG>; McKinney, Elsa <EMcKinne@rivco.org>
Subject: RE: Railroad Avenue Bridge Replacement Project

Hello Frances,

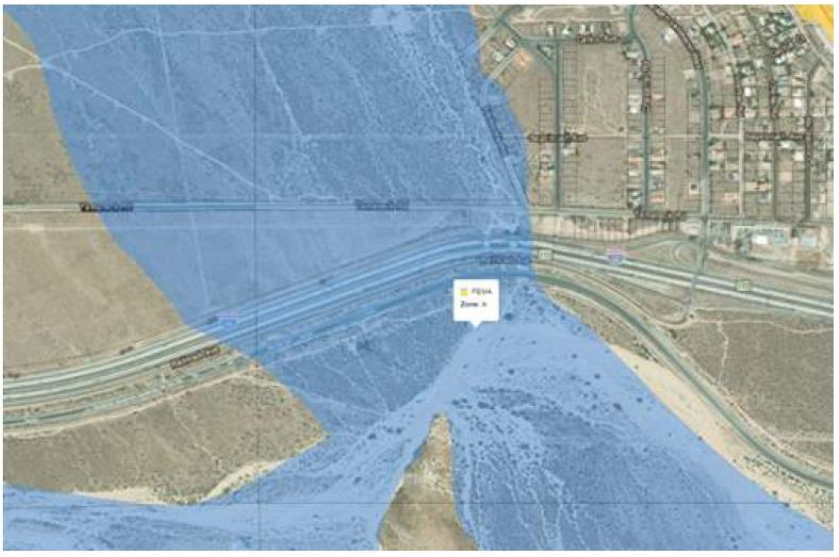
As an FYI, both crossings are within a County Ordinance 458 adopted 100-year floodplains.

The westerly railroad crossing is located within Department of Water Resources Awareness Mapping floodplain and within FEMA unshaded X. This is shown as the darker gray shade.

C7

The easterly railroad crossing is with FEMA Zone A

C7



If you need information on these floodplains, staff in our Floodplain Management Section can help. Please reach out to Hilal Elhaddad copied here and his email is haelhadd@RIVCO.ORG

In reviewing the transmittal letter again, it mentions the County as the lead agency and since the project is within unincorporated area, the County is also the NFIP community to review the proposed structures and confirm no changes are occurring to the existing floodplain limits. I am thinking the floodplain study will likely be forwarded to Hilal's team for review.

C8

I apologize for the delayed information.
Thank you,
Amy

Amy McNeill, PE | Engineering Project Manager
Development Review
Riverside County Flood Control & Water Conservation District
1995 Market Street | Riverside, CA 92501
Direct: 951-955-1214 | Email: ammcneil@rivco.org

From: McKinney, Elsa <EMcKinne@rivco.org>
Sent: Friday, July 7, 2023 9:40 AM
To: Segovia, Frances <FSEGOVIA@RIVCO.ORG>
Cc: McNeill, Amy <ammcneil@RIVCO.ORG>; Cornelius, William <wmcornel@RIVCO.ORG>
Subject: Railroad Avenue Bridge Replacement Project

Hello Frances,

Riverside County Flood Control and Water Conservation District does not have any comments for this project/case since there are no fees to be paid, nor will it have an impact on existing or proposed district facilities.

C9

Best Regards,

Elsa McKinney, Engineering Aide
Development Review
RIVERSIDE COUNTY FLOOD CONTROL
& WATER CONSERVATION DISTRICT
1995 Market Street, Riverside, CA 92501
951.955.2878 | emckinne@rivco.org

Thank you for your comments. Comments have been included within the Final Environmental Document.

Comment C1:

The Riverside County Flood Control & Water Conservation District (RCFC&WCD) reviewed the project in 2019 and had comments on the Preliminary Hydrology and Hydraulics report (pdf of comments was attached). Below is a summary of 2019 comments:

The commenter states that the Project does not negatively influence the Federal Emergency Management Agency (FEMA), Department of Water Resources (DWR) and Special Study Floodplain at either proposed bridge restoration location. However, additional back up documentation is needed in order to support the conclusions. Commenter requested that narrative be added to the report to make this clear and recommends adding the narrative to the "Summary and Recommendations" section. Discussion points to explain include:

1. The approximation of the flowrates and why they are reasonable to not affect floodplain.
2. Why the project does not trigger a Letter of Map Revision (LOMR). The study is only comparing the pre and post condition under the Interstate 10 and Railroad Ave. and does not address the total floodplain width and depth.
3. That by increasing the flow through area (removing the column/piers) under the bridge improve the hydraulic capacity post construction of the crossing. Will the proposed improvements increase the water surface elevation of the floodplain?
4. That Scour depth was calculated to xx depth. The bottom elevation of the bridge abutment is xx feet below scour depths and is protected in the 100-year flowrate.

The commentor also requests that after the revisions are made, that a copy of the revised report is sent to the District for review.

Response:

The revised report submitted to the District included the following revisions:

1. Determining the approximate flow capacity of the existing culverts under the I-10 for East Stubbe Wash and Fornat Wash was not necessary since the hydraulic study model for the Project used Caltrans' 100-year flow rates. Section VI., *Summary and Recommendations*, of the revised Hydraulics and Scour Study Report (Report) (February 2024) was updated to summarize why the proposed Project would not have a significant effect on the floodplain.

2. Section VI., *Summary and Recommendations*, of the revised Report was updated to include a discussion explaining why the proposed Project would not trigger the need for a LOMR.

3. Section IV., *Hydraulics Analysis*, of the revised Report includes a comparison of the 100-year water surface elevation between existing conditions and the proposed conditions. The analysis concludes that there would be a minor increase in the 100-year water surface elevation with the proposed conditions and the increase is considered inconsequential. These findings are also briefly summarized in Section VI., *Summary and Recommendations*.

4. Section VI., *Summary and Recommendations*, of the Report was revised to include the minimum total scour depth of the bridge's abutment footings.

Comment C2:

The District has additional comments on the most recent submittal of the Location Hydraulics Study (LHS) and Summary Floodplain Encroachment Report (SFER) (redline report was attached). Summary of comments state that:

1. Hydraulic models were not available online to review, please see our attached November 2019 comment letter sent via email to Umer Ahmed.
2. Re: Scour - Any recommendation such as toe extension, sideslope protection? Rock slope protection may need to be deeper. Rock slope protection details were not included in this report.
3. Re: Fornat Wash Bridge - located within a DWR floodplain
4. Re: East Stubbe Wash Bridge flood hazard zone – Zone A & San Gorgonio Special Study
5. A variety of comments regarding the flow rates Caltrans prepared for Fornat Wash and East Channel Stubbe Wash:
    - San Gorgonio Q = 7,000 cfs
    - Which typically result in lower flowrate
    - Seems low, District typically designs with a minimum of 1' of freeboard
    - Re: ~~*outdated*~~ older "Troxell" hydrologic calculation method
6. Re: The Hydrologic Engineering Center – River Analysis System (HEC-RAS) model – electronic copy? Missing, could not confirm pre and post floodplain condition, freeboard,…

Response:

1. Hydraulic models are provided in the revised Report. Additionally, the November 2019 comments are addressed under Comment C1 above.
2. The revised Report was updated to include a subsection under Section V., *Scour Analysis*, for scour countermeasures. The Report notes that the toe of the riprap lining will be extended a minimum of eight feet below the channel invert. Additionally, riprap lining is not needed to protect the abutment foundations since the top of the pile caps will be set at the required scour depths. This information is also summarized in Section VI., *Summary and Recommendations*, of the Report. Rock slope protection details are shown in Exhibit C of the Report.
3. The FEMA Flood Insurance Rate Map (FIRM) identified in the Report as Exhibit "D" is under FEMA's jurisdiction instead of the California Department of Water Resources (DWR). Therefore, reference to a DWR floodplain was not incorporated in the revised Report.
4. The preceding sentence in the Report already identifies the area being within a Special Flood Hazard Zone "A". Therefore, reference to Zone "A" was not added again, as recommended in this comment. Additionally, the "San Gorgonio Special Study" is not identified in the FEMA Flood Insurance Rate Map. Because the Report specifically references the FIRM Map, highlighting the San Gorgonio Special Study did not seem appropriate; therefore, it was not added in the revised Report.

5. It was confirmed with the District on September 18, 2023, that Caltrans' 100-year flow rates were used in the hydrology analysis and no revisions are required. Section III., Hydrology, of the revised Report includes an updated summary of the referenced Caltrans study and flow rates. Additionally, the methodology described under Section IV., *Hydraulic Analysis*, of the Report was revised. The District's comments are no longer applicable.
6. The HEC-RAS model was included in the revised Report submitted February 5, 2024.

Comment C3:

The commenter states that the existing flowrates used and referenced were from Caltrans' studies but it is highly likely that the existing FEMA floodplain limits are based on the San Gorgonio Special Study Floodplain. The floodplain limits between the special study and FEMA's are similar. The San Gorgonio Special Study Floodplain has a higher 100-year flowrate of 7,000 cfs for this reach.

Response:

Ceazar Aguilar, PE, of Aquilar Consulting Inc. confirmed with the District (H. Elhaddad, personal communication, September 18, 2023), that the existing 7,000 CFS used and referenced in the LHS and SFER is for two channels instead of only the East Channel Stubbe wash. No revisions to these reports are required.

Comment C4:

The commenter states that the submittal is missing a pre and post floodplain analysis to confirm the new bridge design's impact to the floodplain and whether the project will trigger a FEMA LOMR submittal or not.

Response:

Section IV., *Hydraulic Analysis*, of the revised *Hydraulics and Scour Study for the Railroad Avenue Bridge Replacement Project* (February 5, 2024) includes a comparative analysis of the water surface elevation for pre- and post-Project conditions. The analysis concludes that there would be a minor increase in the 100-year water surface elevation with the proposed conditions and the increase is considered inconsequential. Additionally, Section VI., *Summary and Recommendations*, of the Report was revised to include a summary of why the proposed Project would not trigger the need for a Conditional Letter of Map Revision (CLOMR) or LOMR.

Comment C5:

The commenter notes that the Updated HEC-RAS electronic files were not included online for them to review.

Response:

The HEC-RAS model was included in the revised Report submittal to the District.

Comment C6:

The commenter notes that detailed bridge plans were not included. Bridges need to be included in the HEC-RAS model to determine impact to the floodplain.

Response:

Detailed bridge plans were included as Exhibit C of the revised Report.

Comment C7:

The commenter states for our information, that both crossings are within a County Ordinance 458 adopted 100-year floodplains. The westerly railroad crossing is located within Department of Water Resources Awareness Mapping floodplain and within FEMA unshaded X. The easterly railroad crossing is with[in] FEMA Zone A.

Response:

Thank you for this information, comment has been noted.

Comment C8:

The commenter states that since the project is within unincorporated area and the County is the lead agency, the County is also the National Flood Insurance Program (NFIP) community to review the proposed structures and confirm no changes are occurring to the existing floodplain limits.

Response:

Comment noted. The Report has been forwarded to Hilal Elhaddad with Riverside County Flood Control and Water Conservation District's Floodplain Management Section and their review of the Report has been received, as identified in Comments C1 through C6 above.

Comment C9:

The commenter states that Riverside County Flood Control and Water Conservation District does not have any comments for this project/case since there are no fees to be paid, nor will it have an impact on existing or proposed district facilities.

Response:

Comment noted.

Native American Tribal Groups

Comment D – Agua Caliente Band of Cahuilla Indians (July 6, 2023)

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION

03-006-2023-030

July 06, 2023

[VIA EMAIL TO:fsegovia@rivco.org]
Riverside County
Frances Segovia
3525 14th Street
Riverside, California 92502

Re: Railroad Avenue Bridge Replacement Project

Dear Frances Segovia,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Railroad avenue Bridge Replacement Project project. We have reviewed the documents and have the following comments:

*The presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

*Copies of any cultural resource documentation (report and site records) generated in connection with this project.

*A copy of the records search with associated survey reports and site records from the information center.

*A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.

*A copy of the records search with associated survey reports and site records from the information center.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 699-1143. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

D1

5401 DINAH SHORE DRIVE, PALM SPRINGS, CA 92264
T 760/699/6800 F 760/699/6924 WWW.AGUACALIENTE-NSN.GOV

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION

03-006-2023-030

Jeremy Cummings
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

5401 DINAH SHORE DRIVE, PALM SPRINGS, CA 92264
T 760/699/6800 F 760/699/6924 WWW.AGUACALIENTE-NSN.GOV

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment D1:

Commenter requests the presence of an approved Agua Caliente Native American Cultural Resources monitor during ground disturbing activities, copies of cultural resources documentation, copies of any records searches, and an inventory of cultural resources by a qualified archaeologist.

Response:

As described in Section 3.18 of the Final IS/MND, initial Assembly Bill (AB) 52 consultation letters were sent to the four Native American contacts on the AB 52 list provided by the County. An AB-52 letter was sent to the Agua Caliente Band of Cahuilla Indians on February 23, 2022. The letter was provided to Director/Tribal Historic Preservation Officer, Patricia Garcia-Plotkin. An email response was received from Lacy Padilla, an Archaeologist for the Agua Caliente Band of Cahuilla Indians on March 25, 2022. Ms. Padilla noted the Project is within the Tribe's Traditional Use Area. For this reason, the Tribe requested the following: (1) formal consultation under AB 52; (2) copies of any cultural resource documentation connected to the Project;(3) presence of an approved Cultural Resource Monitor during any ground-disturbing activities associated with the Project. A copy of the Archaeological Survey Report prepared for the Project was sent to the Tribe on March 29, 2022.

On April 4, 2022, the County met with the Tribe for formal consultation. Ms. Padilla noted five prehistoric trails (three trails under Fornat Wash and two trails under East Channel Stubbe Wash) within the Area of Potential Effect (APE), leading from the hills north of the Project to the valley south of the Project. Ms. Padilla requested the schedule for the environmental document circulation and construction schedule, as well as a copy of the environmental document. The milestone schedule for the environmental document circulation and construction schedule was provided to Ms. Padilla on May 11, 2022.

On June 1, 2022, a monitoring denial letter was emailed to the tribe formally closing out AB 52 consultation. If an inadvertent discovery is made, avoidance measures **CR-1** and **CR-2** identified below would ensure the Project would have a less than significant impact on tribal cultural resources.

- **CR-1:** If cultural materials are discovered during construction, all earth-moving activity within 60 feet around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.
- **CR-2:** If human remains are discovered, Health and Safety Code Section 7050.5 states that further disturbances and activities will cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendent (MLD). At this time, the construction contractor will coordinate with the County so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of Public Resources Code (PRC) 5097.98 are to be followed as applicable.

Comment E – Twenty-Nine Palms Band of Mission Indians (August 28, 2023)

Header with Tribal Seal

TWENTY-NINE PALMS BAND OF MISSION INDIANS

46-200 Harrison Place. Coachella, CA. 92236. Ph. 760.863.2444. Fax: 760.863.2449

August 28, 2023

Francis Segovia, Riverside County Transportation Department
County of Riverside Transportation Department
3525 14th Street
Riverside, CA 92501

RE: Public Notice: Railroad Avenue Bridge Replacement Project

Dear Ms. Segovia,

This letter is an informal consultation in regards to the CEQA regulations and the Railroad Avenue Bridge Replacement Project. The plans for replacing two existing, structurally deficient timber bridges over Format Wash and East Channel Stubble Wash along Railroad Avenue. The new bridges would be in the same location and would replace the existing timber bridges with new modern concrete bridges.

After reviewing the proposed project, the Twenty-Nine Palms Band of Mission Indians has determined: The project is outside of the known Chemehuevi Traditional Use Area. The other tribes who do have cultural affiliation with the project area should be contacted.

If you have any questions, please do not hesitate to contact the Tribal Historic Preservation Office at (760) 775-3259 or by email at Christopher.Nicosia@29palmsbomi-nsn.gov.

E1

Sincerely,

Christopher Nicosia
Cultural Resources Manager, Twenty-Nine Palms Band of Mission Indians

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment E1:

Commenter states that after reviewing the Project, the Twenty-Nine Palms Band of Mission Indians has determined the Project is outside of known Chemehuevi Traditional Use Area and suggests that other tribes who do have cultural affiliation with the project should be contacted.

Response:

Comment noted, thank you for the review and confirmation that the Project is not within known Chemehuevi Traditional Use Area.

Interested Groups, Organizations, and Individuals

Comment F – Inland Empire Biking Alliance (July 6, 2023)

INLAND EMPIRE BIKING ALLIANCE

6 July 2023

County of Riverside Transportation Department
Attn: Frances Segovia, Senior Transportation Planner
3525 14th Street
Riverside, CA 92501
Submitted via email to fsegovia@rivco.org.

Re: Railroad Avenue Bridge Replacement Project over Fornat Wash and East Channel Stubbe Wash Initial Study/Mitigated Negative Declaration (SCH #203060768)

Dear Frances Segovia,

I am writing on behalf of the Inland Empire Biking Alliance to response to the Initial Study/Mitigated Negative Declaration which was prepared for the Railroad Avenue Bridge Replacement Project over Fornat Wash and East Channel STubbe Wash and made available for public review and comment. After inspection of the materials, it appears that some aspects relating to biking/active transportation have been overlooked, thus leading the Project to potentially squander a good opportunity if not addressed.

Section 3.17 Transportation of the IS/MND notes that the Project would have No Impact on a) because it would simply be a replacement of bridges and the overall road would not change function. However, it neglects to consider the Western Riverside Council of Governments' Active Transportation Plan which identifies a route of proposed improvement through the Pass, including along Railroad Avenue[1] where the proposed Project is located (see Figure 1). Based on that Plan, it is anticipated that there would be a 10-foot Class I shared use path in the location of the two bridges to be rebuilt by this Project (Figure 2). F1

As is noted in the IS/MND, the existing bridges are well past their 50-year design life and it is highly unlikely that the intention for the rebuild is to have a shorter design life. (And in any case, as is demonstrated by the current bridges, it is not unimaginable that they would remain in use well past the design life once again.) Given that these are structures which last for decades, it is imperative that they do not represent bottlenecks in the future but instead that their replacement can provide strong points to build the rest of the route from. Thus, since a Class I path is being planned for the area of the bridges, the bridges need to be designed to include the planned Class I path as part of the bridge itself. F2

[1] Found online at Active Transportation Plan | WRCOG, CA.

www.iebike.org

INLAND EMPIRE
BIKING ALLIANCE

Thank you for taking the time to receive comments and it is hoped that the Project would be able to be adjusted to not allow this opportunity to further the WRCOG Active Transportation Plan with the Project go to waste. If there are any questions or comments, please do not hesitate to reach out for answers.

Sincerely,

Marven E. Norman, Executive Director

CC: WRCOG

About IEBA The Inland Empire Biking Alliance is advocating for making the Inland Empire a better place for people from all rolls of life. From the children just learning how to ride to the mountain bikers to those headed back and forth to work, school, or their preferred shopping center and beyond, we speak up to make sure they all have safe and convenient place to ride.

www.iebike.org

INLAND EMPIRE BIKING ALLIANCE

WRCOG ACTIVE TRANSPORTATION PLAN

BEAUMONT - BANNING

8 | SAN BERNARDINO – I-10 PASS

Project Map

Project Overview + Scope

The San Bernardino County I-10 Pass Area via Timoteo Canyon Rd route is an east-west regional facility connecting Cabazon and Banning. This potential facility would provide approximately 9.6 miles of shared use path, 8 miles of Class III facilities, 6.5 miles of buffered bike lanes, 4.7 miles of Class II bike lanes, and 0.5 miles of separated bikeway. This project helps address local barriers such as limited non-motorized infrastructure and provides a non-motorized facility within one half mile of major transportation connections, several parks, schools, and retail destinations. The project also improves connectivity to surrounding jurisdictions.

Figure 1. Portion of WRCOG Active Transportation Plan describing Route 8 | San Bernardino – I-10 Pass which would go through area of the Project.

www.iebike.org

INLAND EMPIRE BIKING ALLIANCE

WRCOG ACTIVE TRANSPORTATION PLAN

BEAUMONT - BANNING

8 | SAN BERNARDINO – I-10 PASS

Feasibility Considerations (continued)

- The width of the segment from Illinois Avenue to Highland Springs along 6th Street is 88 feet with a bike lane and two travel lanes in each direction. There is also a 20 foot center median/turn lane. A 12 foot buffered bike lane in each direction could be accommodated by restriping and narrowing travel lanes to be 11 feet.
- The width of the segment from Highlands Springs Avenue to San Gorgonio Avenue along Ramsey Street is 66 feet wide with two travel lanes in each direction and a 13 foot center median/turn lane. A 5-½ foot bike lane in each direction could be accommodated by narrowing travel lanes to 10-11 feet .
- The segment adjacent to the railroad tracks that intersect San Gorgonio could accommodate a 14 foot shared use path.
- The segment adjacent to the railroad tracks, east of Cabazon, could accommodate a 10 foot shared use path.

Figure 2. Portion of WRCOG Active Transportation Plan indicating the planned 10 foot shared use path through the area of the Project.

www.iebike.org

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment F1:

Commenter states that the IS/MND neglects to consider the Western Riverside Council of Governments' (WRCOG) Active Transportation Plan (ATP) which identifies proposed improvements through the Pass, including along Railroad Avenue. Commenter notes that based on the ATP a 10-foot Class I shared-use path is proposed in the location of the two bridges to be rebuilt by the Project.

Response:

Section 3.17, *Transportation*, of the Final IS/MND has been updated to include WRCOG's ATP (2018) in the list of adopted plans that the Project is consistent with. WRCOG's ATP was coordinated with the Riverside County Comprehensive Trails Plan so that each plan compliments and builds on the recommendations of the other. As noted in the ATP, the Riverside County Comprehensive Trails Plan incorporates information from the existing 21 regional area plan trail systems, to inform existing conditions and planning context within the plan area. The County's Trail Plan is intended to connect smaller communities through seamless transitions from community to regionally maintained systems. This intent aligns with the goals of the ATP.

As noted in the ATP, there is a regional route identified as Project Reference #8 | San Bernardino County – I-10 Pass Area. Figure 1 provided in the comment letter received shows the proposed regional route as extending east along I-10 to the Banning/Riverside County line, approximately 1 mile past the bridge over Fornat Wash, but west of the bridge over East Channel Stubbe Wash. Figure 1 notes that the route proposes Class III facilities which are streets designated for bicycle travel and shared with motor vehicles. Figure 2, also provided in the comment, identifies feasibility considerations which states "a segment adjacent to the railroad tracks, east of Cabazon, could accommodate a 10-foot shared use path". The proposed Project is limited in scope and intended to address the structural deficiencies and safety concerns related to the timber bridges. However, it does not preclude future development of a shared use path along the roadway. The proposed Project would provide two 12-foot-wide travel lanes in each direction and a 4-foot-wide shoulder on each side. These improvements exceed the suggested 10-foot shared use path proposed along this segment allowing for designation as a Class III facility in the future.

Comment F2:

Commenter notes the importance of designing the bridges to include the planned Class I path as part of the bridge itself so the bridges do not represent bottlenecks in the future.

Response:

The intent of the proposed Project is to replace the existing timber bridges to address structural deficiencies and safety concerns along Railroad Avenue. Including a shared use path along the bridges would substantially increase the cost and footprint of the Project and does not meet the objectives of the Project. These objectives include minimizing the project footprint to avoid impacts on sensitive habitat and species, maintaining consistency with the conservation objectives of the CVMSHCP, and addressing the specific deficiencies of the current bridge structures so the roadway can continue to be used as a by-pass for I-10. Although the proposed

Project would not include a shared use path as part of the new bridge structures, the Project would not preclude future development of a shared use path. The proposed Project would provide two 12-foot-wide travel lanes in each direction and a 4-foot-wide shoulder on each side. These improvements exceed the suggested 10-foot shared use path proposed along this segment allowing for designation as a Class III facility in the future.

Comment G – Coachella Valley Conservation Commission (July 21, 2023)

COACHELLA VALLEY CONSERVATION COMMISSION

CVCC

Cathedral City • Coachella • Desert Hot Springs • Indian Wells • Indio • La Quinta • Palm Desert • Palm Springs
Rancho Mirage • County of Riverside • Coachella Valley Water District • Imperial Irrigation District
Mission Springs Water District

July 21, 2023

Frances Segovia
Senior Transportation Planner
Riverside County Transportation Department
3525 14th St.
Riverside, CA 92501

RE: Notice Intent to Adopt a Mitigated Negative Declaration for Railroad Avenue Bridge Replacement Project

Dear Mr. Segovia:

The Coachella Valley Conservation Commission (CVCC) has received Riverside County Transportation Department's (County) Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) for the Railroad Avenue Bridge Replacement project (Project). CVCC is a joint powers authority tasked with implementing and administering the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP or Plan), to which the County is a permittee. The CVMSHCP balances conservation of the area's unique natural resources with economic growth and urban development. It provides incidental take coverage to permitted projects within the urbanized parts of the Coachella Valley in exchange for the acquisition and perpetual conservation of natural lands in ecologically critical regions designated as Conservation Areas.

The IS/MND describes the Project as replacing two existing, structurally deficient timber bridges over Fornat Wash and East Channel Stubbe Wash along Railroad Avenue in the unincorporated community of Cabazon. The existing timber bridges each carry two lanes of traffic and are thirty-two feet from curb to curb. The bridges are approximately fifty-nine feet long. The proposed bridges would be constructed out of concrete, with two, twelve-foot lanes and an additional four-foot shoulder on each side. Both bridges will feature traffic barriers and railings. The reconstructed bridges are anticipated to span approximately sixty feet and maintain their current elevations, although minor modifications might take place to maintain freeboard requirements. Channel bottoms are expected to remain earthen, and no riprap is planned along the banks. All construction activities, staging, and laydown areas are anticipated to take place within the existing right-of-way.

The Project will span two of the CVMSHCP's Conservation Areas: the Fornat Wash bridge is located within the Cabazon Conservation Area, while the East Channel Stubbe Wash bridge is located within the Snow Creek/Windy Point Conservation Area. In both Conservation Areas, operation and maintenance activities for Railroad Avenue are listed as a Covered Activity in section 7.3.1, indicating that mitigation measures for environmental impacts from any such activities have already been accounted for in the County's existing obligations under the Plan. This specific facility is not subject to any avoidance, minimization, and mitigation measures as contemplated by the CVMSHCP. Operations and maintenance

G1

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activities include bridge maintenance such as deck and railing replacement, column replacement, and reconstruction/placement of check dams. Operations and maintenance activities for Covered Activities are not required to go through the Joint Project Review process. The Project was confirmed as operations and maintenance under the CVMSHCP by CVCC staff in September 2019.

Cont. G1

Although the IS/MND correctly identifies the Project as a Covered Activity, CVCC recommends the language on page 23 be revised to clarify that the Project is a Covered Activity because impacts to Railroad Avenue due to operations and maintenance, including bridge repair and replacement, have already been accounted for during the CVMSHCP planning process and factored into the County's existing obligations. Siting within a Conservation Area does not confer Covered Activity status.

G2

Permittees conducting Covered Activities that may impact connectivity with and across Conservation Areas are obligated to coordinate with CVCC regarding the size, location and configuration of any wildlife undercrossing prior to the public release environmental documents, as described in Section 6.6.1.1 of the CVMSHCP. It is unclear if previous consultation with CVCC involved any such discussion; CVCC requests the opportunity to review the bridge designs prior to permit finalization to ensure they will continue to function as viable wildlife undercrossings.

G3

Covered Activities are required to implement the land use adjacency guidelines to avoid indirect and edge effects to the surrounding Conservation Area. CVCC acknowledges that these guidelines have been included as part of mitigation measure BIO-2. To more effectively limit the transmission of invasive species (notably stinknet (*Oncosiphon piluliferum*)) into the Conservation Areas, CVCC recommends that work vehicles – especially those coming from outside the Coachella Valley – be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site. The California Invasive Plant Council provides useful best management practices for transportation and utility corridors to ensure the potential to spread invasives is minimized[1]. CVCC further recommends that on-site biological monitors remain alert to the propagation of any invasive species within the work area and facilitate their removal before they are able to establish in the Conservation Areas and cause future land and habitat management issues.

G4

Finally, CVCC would like to inform the County that the Coachella Valley In-Lieu Fee mitigation program has been terminated, and CVCC no longer sells advance mitigation credits for impacts to Waters of the United States.

G5

CVCC appreciates the opportunity to comment on the County's IS/MND of the proposed Project, and hopes that these comments provide useful guidance to the County in continuing to meet its obligations under the CVMSHCP. If you have any questions, please do not hesitate to reach me by email at psatin@cvag.org or by phone at 760.346.1127.

Sincerely,

Peter Satin
Regional Planner

[1] https://cal-ipc.org/docs/bmps/dd9jwo1ml8vttq9527zjhek99qr/BMPsTransportUtilityCorridors.pdf

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Thank you for your comments. Comments have been included within the Final Environmental Document.

Comment G1:

Commenter provides a general summary and confirmation of the Project's location in relation to the CVMSHCP's Conservation Areas and acknowledges that in 2019 CVCC staff confirmed the Project is a Covered Activity under the CVMSHCP as operation and maintenance.

Response:

Thank you for re-confirming that the proposed Project is a Covered Activity under the CVMSHCP as operation and maintenance. Furthermore, the Project team appreciates the additional clarity that mitigation measures for impacts have already been accounted for in the County's existing obligations under the CVMSHCP, that avoidance, minimization, and mitigation measures are not required for the facility as contemplated by the CVMSHCP, and that Covered Activities are not required to go through the Joint Project Review process.

Comment G2:

Commenter recommends the language on page 23 be revised to clarify that the Project is a Covered Activity because impacts to Railroad Avenue due to O&M, including bridge repair and replacement, have already been accounted for during the CVMSHCP planning process and factored into the County's existing obligations. Commenter notes that siting within a Conservation Area does not confer Covered Activity status.

Response:

Comment noted, the language in the Environmental Setting section has been revised as recommend by CVCC to clarify the Project is a Covered Activity. Comment regarding siting within the Conservation Area does not confer Covered Activity status is noted.

Comment G3:

Commenter states that as described in Section 6.6.1.1 of the CVMSHCP permittees conducting Covered Activities that may impact connectivity within and across Conservation Areas are obligated to coordinate with CVCC regarding size, location, and configuration of any wildlife undercrossing prior to the public release of environmental documents. Commenter notes that it is unclear if previous consultation with CVCC involved any such discussion and requests the opportunity to review the bridge designs prior to permit finalization.

Response:

During consultation conducted in April and September of 2019, the CVCC confirmed that the Project is a covered O&M activity, inclusive of bridge repair and replacement, which has already been accounted for during the CVMSHCP planning process and factored into the County's existing obligations. The CVCC reconfirmed in a public comment letter to the IS/MND dated July 21, 2023 (see Comment G1) that the Project is a Covered Activity. During consultation conducted between February and March of 2024, the County provided the preliminary design plans of the proposed bridge structures to the CVCC for review. On March 19, 2024, the Project team met with the CVCC to discuss their comment letter on the Draft IS/MND, preliminary

design plans related to wildlife connectivity, Project's CVMSHCP consistency, previous coordination efforts, and required future agency coordination.

After reviewing the preliminary design plans the CVCC requested additional information regarding installation of the rock slope protection within the channel and details pertaining to the slope paving. The CVCC also requested that the design plans demonstrate the dimension of the undercrossings, as well as additional information regarding long-term scour elevation. On April 3, 2024, the County provided revised preliminary design plans showing additional details related to the rock slope protection and slope paving. The revised plans also included tables with information on undercrossing grades and scour elevations as requested. On April 23, 2024, the County followed up with the CVCC to ask if they had any further comments or questions on the revised design plans, or if they needed any further project information. The CVCC responded on April 25, 2024 noting that the revised plans had been reviewed and they did not have any further questions at present.

On May 22, 2024, the CVCC provided a letter (see Appendix D), stating that O&M activities are not required to undergo the Joint Project Review process; however, activities that may impact habitat connectivity are subject to consultation with the CVCC. They also stated that they did not anticipate the corridors would be adversely impacted by the proposed O&M activities. The CVCC requested an additional opportunity to review the Project design plans prior to finalization to ensure minimum bridge dimensions have been maintained.

Comment G4:

Commenter states Covered Activities are required to implement the land use adjacency guidelines to avoid indirect and edge effects to the surrounding Conservation Areas. Commenter acknowledges that these guidelines have been included as part of measure BIO-2 and recommends that to more effectively limit the transmission of invasive species (notably stinknet [*Oncosiphon piluliferum*]) into the Conservation Area, work vehicles – especially those coming from outside Coachella Valley – be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site. Commenter further recommends that on-site biological monitors remain alert to the propagation of any invasive species within the work area and facilitate their removal.

Response:

Measure BIO-2, Best Management Practices has been modified to include the following bullet: "Work vehicles shall be inspected and cleaned to remove any seeds or other propagules prior to entering the construction site." Furthermore, Measure BIO-3, states that "ongoing weekly monitoring and reporting will occur throughout the duration of construction activities to ensure BMPs in **BIO-2** are implemented."

Comment G5:

Commenter states that the CVCC ILFP mitigation has been terminated, and CVCC no longer sells advance mitigation credits for impacts to Waters of the United States.

Response:

Measure BIO-4, *Compensatory Mitigation for Replacement/Restoration of Jurisdictional Waters* has been revised to state: "Compensation can occur through the option of permittee-responsible

onsite or offsite mitigation and will be determined in consultation with the USACE, RWQCB, and CDFW."

Comment H – The Center of Biological Diversity and the San Gorgonio Chapter of the Sierra Club (July 17, 2023)

Submitted via email

July 27, 2023

County of Riverside Transportation Department
Attn: Frances Segovia, Senior Transportation Planner
3525 14th Street,
Riverside, CA 92501
fsegovia@rivco.org

Re: Comments on the Initial Study/Mitigated Negative Declaration for the Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and East Channel Stubbe Wash (Br. No. 56C0101)

Dear Frances Segovia:

These comments are submitted on behalf of the Center for Biological Diversity ("the Center") and the San Gorgonio Chapter of the Sierra Club regarding the draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Railroad Avenue Bridge Replacement Project over Fornat Wash and East Channel Stubbe Wash. We recognize that the existing bridges are aged infrastructure that need to be brought up to current safety standards. The proposed Project is anticipated to remove and replace old timbered bridges with new CalTrans compliant concrete bridges. However, we are concerned that the IS/MND may not fully mitigate the impacts of the bridge upgrades and fails to include new required improvements to facilitate improved wildlife connectivity on the Project sites. This Project provides an important opportunity to improve connectivity, support the area's rich biodiversity, and increase climate resilience. We urge that these issues be re-evaluated and that substantial revisions be made to the IS/MND to adequately analyze and mitigate the Project's impacts for public review.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has 1.7 million members and supporters throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, wildlife connectivity, open space, air and water quality, and overall quality of life for people in Riverside County.

The Sierra Club is a national nonprofit organization of over 732,000 members dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Over 193,500 Sierra Club members reside in California. The San Gorgonio Chapter of the Sierra Club focuses on issues within the inland empire, including Riverside and San Bernardino County.

I. Compliance with the CVMSHCP

The IS/MND maintains that the project is a Covered Activity under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) pursuant to Section 7.3.1.1 which pertains to Operations and Maintenance (O&M) of existing facilities/structures in Conservation Areas. The County and Caltrans may maintain that the complete replacement of two bridge structures within the Biological Corridor and Essential Ecological Process area is a simple O&M project, but it appears to be more than that by its own description, which reads as follows:

> The proposed Project would replace the existing 2-lane timber bridges with new 2-lane modern concrete bridges. The proposed road width would consist of two 12-foot-wide travel lanes, one lane in each direction, and a 4-foot-wide shoulder on each side. Modern traffic barriers/railings meeting current Caltrans safety design standards would be constructed. The proposed bridges would be approximately 60 feet long depending on the channel hydraulic capacity and water surface freeboard requirements. Potentially the elevation of Fornat Wash Bridge may increase, but by no more than two feet to meet freeboard requirements. The East Channel Stubbe Wash Bridge elevation would remain the same. Additionally, approach roadway improvements would be provided, and channel improvements would be administered to avoid future scour problems. It is envisioned that the channel bottom would remain earthen. (IS/MND at 2).

Arguably, complete replacement of bridges is not what is normally regarded as O&M. This project is of great concern to us as the Stubbe Canyon undercrossing of I-10 is a critical linkage between the Eastern Peninsular Ranges (Santa Rosa/San Jacinto Mountains) and the Transverse Ranges (San Bernardino Mountains and their northwards extensions). This linkage is, in fact, one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands, 2008). The CVMSHCP recognizes this and has a specific Conservation Objective for maintaining a Biological Corridor where the proposed project is. Further, the I-10 undercrossing is a crucial fluvial sand transport process linking Stubbe Canyon Wash with the San Gorgonio River which provides crucial sand to the Snow Creek/Windy Point Conservation Area and the Whitewater Floodplain Conservation Area.

H1

At a minimum, the IS/MND should be revised to include more substantial assessments and mitigation of the Project's impacts to comply with the CVMSHCP and the California Environmental Quality Act (CEQA).

H1 Cont.

II. The MND Fails to Adequately Assess and Mitigate the Project's Impacts to Wildlife Connectivity and Regional Biodiversity

The IS/MND correctly identifies that Fornat Wash and East Channel Stubbe Wash are both "important biological corridor[s]" under the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), connecting the San Bernardino and San Jacinto mountains. However, the IS/MND fails to mention that the Project area is ranked as having high biodiversity and has also been identified as an "Irreplaceable and Essential Corridor" and "Conservation Planning Linkage" (CDFW 2018)[1] as well as a "Priority Linkage" (SC Wildlands, 2008).

H2

With Assembly Bill 2344 (AB 2344)—The Safe Roads and Wildlife Protection Act—being passed and signed into law in 2022, the County and Caltrans are required to seriously consider and more importantly *restore* wildlife movement when there is new construction and/or when improvements are being made to existing transportation infrastructure. The bill specifically states:

> It is therefore the policy of the state to protect, restore, and enhance the functioning of fish, wildlife, and habitat connectivity in connection with the planning, construction, and improvement of transportation infrastructure throughout the state and, where feasible, the operation and maintenance of transportation infrastructure throughout the state. (AB 2344 Section 1(b)).

Despite this clear language and the area's high wildlife biodiversity and connectivity value, the IS/MND fails to adequately assess and mitigate the Project's impacts to wildlife connectivity. Although the IS/MND acknowledges that both underpasses likely facilitate wildlife movement, no specific crossing study was conducted for the proposed Project. Instead, the IS/MND relies on a study from 10 years ago that only investigated one of the two underpasses:

> Although no specific crossing study was conducted for the proposed project, a separate study conducted by the University of Riverside Center for Conservation Biology evaluated the underpass at East Channel Stubbe Wash to determine wildlife movement and usage patterns (Murphey-Mariscal Barrows 2013). (Natural Environment Study at 24).

H3

This lack of analysis is insufficient to establish a reliable baseline of existing environmental conditions present at the Project site. Under CEQA, an environmental review document must evaluate the potential environmental impacts of the project as compared to the existing environmental conditions (the "baseline"), so that the Project's impacts can be meaningfully analyzed and compared to alternatives. (CEQA Guidelines §

[1] CDFW Areas of Conservation Emphasis (2018). Available at: https://apps.wildlife.ca.gov/ace/

15125(a); *see County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952; *Neighbors for Smart Rail v. LA County Metropolitan Transit Authority* (2013) 57 Cal.4th 310, 315.) The evidence provided in the IS/MND's analysis of impacts to wildlife connectivity does not meet this standard.

H3 Cont.

It is widely recognized that the continuing fragmentation of habitat by humans threatens biodiversity and diminishes our (humans, plants, and animals) ability to adapt to climate change. In a report for the International Union for Conservation of Nature (IUCN), world-renowned scientists from around the world stated that "[s]cience overwhelmingly shows that interconnected protected areas and other areas for biological diversity conservation are much more effective than disconnected areas in human-dominated systems, especially in the face of climate change" and "[i]t is imperative that the world moves toward a coherent global approach for ecological connectivity conservation, and begins to measure and monitor the effectiveness of efforts to protect connectivity and thereby achieve functional ecological networks" (Hilty et al., 2020). Here, the County has an opportunity and responsibility to adequately mitigate the Project's impacts and improve wildlife connectivity in this critical connectivity area between the San Bernardino and San Jacinto mountains.

The current clearance under Fornat Bridge is only two feet above the wash floor (IS/MND at 11) and the IS/MND states that the elevation may increase "by no more than two feet to meet freeboard requirements" (IS/MND, p.2), which suggests the bridge would have a four-foot elevation at most. However, much more can and should be done to allow for a greater diversity of species to move through the area, including local mountain lions, a candidate species under the California Endangered Species Act (CESA), and federally threatened desert tortoises. Therefore, the bridge should be built at a minimum of four feet above the wash floor to increase the openness ratio and facilitate more species movement. Additional analysis on the feasibility of an even higher elevation that would be more conducive for larger species to move through should also be included in a revised IS/MND. Similarly, the openness ratio of the East Channel Stubbe Wash Bridge should also be maximized for diverse species, large and small, to move through.

H4

Corridor redundancy (*i.e.* the availability of alternative pathways for movement) allows for improved functional connectivity and climate change resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008). Corridor redundancy also provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008, 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008). Therefore, the County should take this opportunity to enhance connectivity in this critical corridor and construct both bridges to accommodate as many species as possible.

III. The IS/MND Fails to Adequately Assess and Mitigate the Project's Impacts to Southern California and Central Coast Mountain Lions, a Candidate Species Under the California Endangered Species Act

Local mountain lions are provisionally listed under CESA because humans have extended roads and development into mountain lion habitat with little to no regard of their movement needs. Yet there is no mention of them in the IS/MND. The IS/MND fails to adequately assess and mitigate the Project's impacts to mountain lions.

Extensive research indicates that existing highway and development networks have separated the state's mountain lion population into multiple isolated populations, which has led to high levels of inbreeding and poor genetic health (Benson et al., 2019; Ernest et al., 2014; Gustafson et al., 2018, 2021; Riley et al., 2014; Vickers et al., 2015). Low genetic diversity combined with high human-caused mortalities (*e.g.*, from car strikes, depredation kills, rodenticide poisoning, and poaching) threaten the long-term survival of several populations in Southern California and along the Central Coast.

Pumas in Southern California have dangerously low genetic diversity (Gustafson et al., 2018, 2021). Scientists have documented physical and reproductive signs of inbreeding depression in local mountain lions, including pumas from the Eastern Peninsular Range, due to being boxed in by roads and development (Huffmeyer et al., 2021). And researchers have found that, of the California mountain lion subpopulations, the San Gabriel/San Bernardino (SGSB) population has the smallest effective population size and the smallest area of available habitat (Dellinger et al., 2020; Gustafson et al., 2021). Scientists suggest that the SGSB population "may be approaching levels of genetic drift and inbreeding similar to the well-monitored and genetically depauperate Santa Ana and Central Coast South populations (Ernest et al., 2014; Gustafson et al., 2017; Riley et al., 2014)" (Gustafson et al., 2021), which are predicted to have a 99% chance of becoming locally extinct within 50 years if inbreeding depression occurs. (Benson et al., 2019). This emphasizes the importance of protecting remaining habitat and enhancing connectivity between the SGSB and Eastern Peninsular Range (e.g., in the Project area) to improve the Southern California cougars' chances of long-term survival.

H5

IV. Mitigation Requirements and Success Criteria Are Unclear

The IS/MND requires mitigation for impacts to biological resources including temporary and permanent impacts to jurisdictional resources (IS/MND Table 5 at 39). However, the mitigation is vague and improperly deferred. For temporary impacts, the IS/MND identifies that mitigation will be fulfilled through "restoration to pre-construction conditions" without providing a mitigation ratio. This leaves the public questioning whether any mitigation at all will actually be conducted, and to what "pre-construction conditions" the area will be restored to if mitigation is completed.

H6.1

Permanent impact mitigation ratio is also not identified. The IS/MND identifies potential mitigation options (IS/MND at 39-40), but fails to clearly identify how much and where the mitigation will be done. The commitment to monitor for success of

H6.2

mitigation and success criteria are also missing from the IS/MND. Instead the details of the mitigation for jurisdictional resources are left to future consultations out of the public eye between project proponents and regulatory staff. These basic and critical details need to be included in the impact analyses. In replicating the pre-construction conditions, details on plant density/cover/diversity etc. all need to be identified in order to evaluate the success of the revegetation effort and included in the environmental review. H6.3

The IS/MND finds that less than significant impacts to connectivity will occur (IS/MND at 40), but as discussed above, without a pre-construction baseline of wildlife use of the passage under the bridges, and post-construction monitoring of use, the significance of the impact cannot be determined. H6.4

Inconsistencies with applicable habitat conservation plans constitute significant effects under CEQA and NEPA, and therefore the impacts must be disclosed and mitigated. *See Joshua Tree Downtown Business Alliance v. County of San Bernardino*, 1 Cal.App.5th 677, 695 (2016) (an effect may be significant under CEQA if the project is inconsistent with applicable land use policies designed to mitigate environmental effects). H6.5

Again, we urge the County and Caltrans to recognize this project as an opportunity to contribute to the implementation of the CVMSHCP Conservation Objectives and the enhancement of this crucial linkage for an array of species between the mountain ranges. They could do so by designing the bridge structures to improve the ability of diverse wildlife, including imperiled mountain lions, to use these corridors. One way to accomplish that would be to increase the openness ratio of the underpasses by increasing their height. Consideration should also be given to an open area in the center of the bridge allowing more light in the undercrossings. There may also be other design or mitigation measures that would be of significant value, and we strongly recommend that the County and Caltrans confer with USFWS, CDFW, and recognized linkage experts to identify the Best Practices that could be incorporated into the design of these structures. H6.6

V. Conclusion

Life on Earth is experiencing a sixth mass extinction driven primarily by habitat loss and fragmentation. Combating this crisis requires bold action to ensure we protect our remaining natural resources. This not only helps wildlife, but it is essential to building a healthy, climate-resilient future for all Angelenos. Native landscapes help us regulate our climate, purify our air and water, pollinate our crops, and create healthy soil. The long-term resilience of regional biodiversity and ecosystems, due to the combined pressures of climate change and urban stressors, depends on strengthened wildlife connectivity for species and ecological processes over time. We urge the County to address the issues discussed above in a revised CEQA document that analyzes the entire scope of the project and takes full consideration of this opportunity to enhance wildlife connectivity. H7

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Thank you for the opportunity to submit comments on the Project. Please include the Center on your notice list for all future updates to the Project and do not hesitate to contact the Center with any questions at the email addresses listed below.

Sincerely,

Ileene Anderson
Senior Scientist
Center for Biological Diversity

Tiffany Yap, DEnv/PhD
Senior Scientist
Center for Biological Diversity

Joan Taylor, Conservation Chair
Tahquitz Group of the Sierra Club

cc: via email
Karin Cleary Rose USFWS karin_cleary-rose@fws.gov
Heidi Calvert, CDFW Heidi.Calvert@wildlife.ca.gov

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment H1:

Commenter states that complete replacement of bridges is not what is normally regarded as Operations and Maintenance of existing facilities/structures and that the Project is of great concern as the Stubbe Canyon undercrossing of I-10 is a critical linkage between the Eastern Peninsular Ranges and the Transverse Ranges. Commenter notes that it is one of the 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the Southern Sierra Nevadas. Commenter states that the CVMSHCP has a specific Conservation Objective for maintaining a Biological Corridor in the proposed Project area and that the I-10 undercrossing is a crucial fluvial sand transport process linking Stubbe Canyon Wash with the San Gorgonio River. Commenter recommends the IS/MND be revised to include more substantial assessments and mitigation of the Project's impacts to comply with the CVMSHCP and CEQA.

Response:

The Project team has coordinated with the CVCC to ensure compliance with the CVMSHCP. The CVCC confirmed in April and September 2019 and reconfirmed in a public comment letter to the IS/MND dated July 21, 2023 (see Comment G1), that the Project is a Covered Activity per section 7.3.1.1 of the CVMSHCP. During additional consultation conducted between February and May of 2024, the CVCC reconfirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance (O&M), as described in Section 7.3.1.1 of the CVMSHCP (see letter dated May 22, 2024, Appendix D). Additionally, during a meeting with the CVCC in May 2024, the CVCC noted that the Project is considered an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring.

The Project acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area. Information on wildlife corridors is included in the Environmental Setting section of the Final IS/MND under Wildlife Crossings and an analysis of temporary impacts to wildlife crossings is provided in Section 3.4, Biological Resources, Impact (d) of the Final IS/MND. During construction, there would be an increase in human presence and use of construction equipment that generate noise and vibration, which could deter wildlife from using the area as a wildlife corridor. However, wildlife could potentially use alternative undercrossing approximately 500 and 270 feet from the affected crossings. Due to the typical crepuscular and nighttime usage patterns by desert species, the potential direct and indirect effects on biological corridors during construction are anticipated to be minimal. Biological corridors would be fully accessible for wildlife movement post construction. All construction related impacts to the Biological Corridors would be temporary and during Project operations the corridors will function the same as existing conditions.

Comment H2:

Commenter states that the IS/MND fails to mention that the Project area is ranked as having high biodiversity and has also been identified as an "Irreplaceable and Essential Corridor" and "Conservation Planning Linkage" as well as a "Priority Linkage".

Response:

The Environmental Setting section of the Final IS/MND under the subheading, *Wildlife Corridors,* has been revised to incorporate references noted and clarify that the Project area is an important biological corridor.

Comment H3:

Commenter states that the IS/MND fails to adequately assess and mitigate the Project's impact to wildlife connectivity as no specific crossing study was conducted for the proposed Project and only a reference to a study from 10 years ago, which only investigated one of the two underpasses, was made. Commenter states that the analysis is insufficient to establish a reliable baseline of existing environmental conditions at the Project site and therefore, the evidence provided in the IS/MND's analysis of impacts to wildlife connectivity does not meet CEQA standards.

Response:

Section 3.4, *Biological Resources*, of the Final IS/MND, has been updated to include discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. Although the Project is situated within wildlife corridors, specific improvements to wildlife connectivity in the region is beyond the Project's intent, to address structural deficiencies, as an operation and maintenance activity.

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project and does not meet the intent of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings. On March 19, 2024, the Project team met with the CVCC to discuss their comment letter on the Draft IS/MND, which included the Project's effect related to wildlife connectivity. The CVCC reviewed the Project's preliminary design plans and in a letter dated May 22, 2024 (see Appendix D), the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed O&M activities.

Furthermore, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the washes would continue to provide connectivity for a diversity of wildlife.

Comment H4:

Commenter states the County has an opportunity and responsibility to adequately mitigate for the Project's impacts and improve wildlife connectivity between the San Bernardino and San Jacinto mountains. Commenter suggests modifying the Project to increase the openness ratio of the Fornat Bridge underpass to a minimum of four feet above the wash floor or even higher if feasible to facilitate more species movement. Commenter also suggests that the East Channel Stubbe Wash Bridge openness ratio should also be maximized for diverse species, large and small, to move through.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge approximately two feet to meet freeboard requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

Furthermore, providing a wide range of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10 that supports wildlife movement of a diversity of wildlife species, in addition to reducing human disturbance has been determined to be the most important for supporting biological diversity (Murphy-Mariscal et al., 2015). The Project would not increase capacity nor is it anticipated that the Project would result in an increase in human disturbance within the area.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife.

Comment H5:

Commenter cites research regarding the effects of highways on mountain lions and pumas in Southern California. Commenter states that the IS/MND does not mention mountain lions, which are provisionally listed under the California Endangered Species Act (CESA) and fails to adequately assess and mitigate the Project's impacts to this species.

Response:

Reference to mountain lions has been added to the Environmental Setting and Impact Analysis under *Special-Status Mammals* in Section 3.4 of the IS/MND.

Measure **BIO-2** would address potential indirect effects on sensitive mammals that may occur within the vicinity of the Project area. Furthermore, as identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain

earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment H6.1:

Commenter states the Project is required to mitigate for impacts to biological resources, including temporary impacts to jurisdictional resources. Commenter states the mitigation is vague and improperly deferred and notes that the mitigation does not provide a ratio for restoration to preconstruction conditions.

Response:

Measure **BIO-1** states the following: "…all temporary construction areas and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix…"; therefore, all areas of temporary impact will be restored, which is a 1:1 ratio.

Comment H6.2:

Commenter states the Project is required to mitigate for impacts to biological resources, including permanent impacts to jurisdictional resources. Commenter states that a mitigation ratio for permanent impacts is not identified and that the IS/MND fails to clearly identify how much and where potential mitigation options will be done.

Response:

The proposed Project is a Covered Activity under the CVMSHCP as operation and maintenance. Mitigation measures for O&M impacts have already been accounted for in the County's existing obligations as a permittee under the CVMSHCP. The Project is required to comply with applicable avoidance, minimization, and mitigation measures described in Sections 4.4 and 4.5 of the CVMSHCP. In addition, the Project will implement measures **BIO-1** through **BIO-9** that fully address potential impacts on biological resources. No additional measures are necessary to fully mitigate the effects of the Project on biological resources.

Table 5 under Impact (b) in the *Impact Analysis* section of the Final IS/MND provides the temporary and permanent impacts to jurisdictional resources from the proposed Project. BIO-4 requires compensatory mitigation for impacts to jurisdictional resources. Compensation is detailed as enhancement, restoration, rehabilitation, or replacement. BIO-1 requires restoration for temporary impacts. BIO-4 has been revised to clarify that permanent mitigation will occur on- or off-site at a minimum 1:1 ratio. Final mitigation ratios will be determined after consultation with the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW during the permitting phase of the Project (BIO-4). Ultimately, the resource agencies, who provide oversight for the success of the replacement resources, establish the final ratio for replacement during the permitting phase. Existing pre-construction conditions of the Project related to plant density/cover/diversity is detailed in Section 3.4 of the IS/MND under *Environmental Setting*.

Comment H6.3:

Commenter states that mitigation and success criteria for jurisdictional resources are missing from the IS/MND and mitigation details are left to future consultations between the Project proponent and regulatory staff. Commenter notes that basic and critical details, such as plant density/cover/diversity, need to be identified and included in the impact analysis to evaluate the success of revegetation efforts.

Response:

Table 5 under Impact (b) in the *Impact Analysis* section of the Final IS/MND provides the temporary and permanent impacts to jurisdictional resources from the proposed Project. BIO-4 requires compensatory mitigation for impacts to jurisdictional resources. Compensation is detailed as enhancement, restoration, rehabilitation, or replacement. BIO-1 requires restoration for temporary impacts. **BIO-4 has been revised to clarify that** permanent mitigation will occur on- or off-site at a minimum 1:1 ratio. Final mitigation ratios will be determined after consultation with the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW during the permitting phase of the Project (BIO-4). Ultimately, the resource agencies, who provide oversight for the success of the replacement resources, establish the final ratio for replacement during the permitting phase. Existing pre-construction conditions of the Project related to plant density/cover/diversity is detailed in Section 3.4 of the IS/MND under ***Environmental Setting***.

Comment H6.4:

Commenter states that without a pre-construction baseline of wildlife passage under the bridges and post-construction monitoring, the significance of impacts cannot be determined.

Response:

As discussed in the Final IS/MND, temporary impacts to wildlife crossings may occur at both bridges during construction; however, wildlife that might normally use the undercrossings at Fornat Wash and East Channel Stubbe wash could potentially use undercrossings approximately 500 feet and 270 feet west of each wash respectively during construction. In addition, passage through these two washes would be available during construction if no night work occurs. Following construction, the crossings would be restored to baseline conditions. Specifically, due to use of more modern and strong materials, the replacement bridges would be single-span structures requiring no columns within the channel bed, which would increase the openness ratio of both bridge undercrossings.

Comment H6.5:

Commenter states that if the Project is inconsistent with applicable land use policies designed to mitigate environmental effects it would result in a significant effect under CEQA and National Environmental Policy Act (NEPA).

Response:

Comment noted. As discussed under Section 3.4, *Biological Resources*, response to Impact (f) of the Final IS/MND, the Project is consistent with the CVMSHCP.

Comment H6.6:

Commenter urges the County and Caltrans to recognize the Project as an opportunity to contribute to the implementation of the CVMSHCP Conservation Objectives for enhancement of crucial wildlife linkages between mountain ranges by designing the bridge structures to improve use by diverse wildlife. Commenter notes that increasing the openness ratio of the underpasses by increasing their height and providing an open area in the center of the bridges to allow more light in, as well as other design or mitigation measures would also improve the ability of diverse wildlife to use these corridors. Commenter strongly recommends that the County and Caltrans confer with the USFWS, CDFW, and other recognized linkage experts to identify Best Practices that could be incorporated into the bridge structure design.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the passage. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians.

Furthermore, providing a wide range of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10, and reducing human disturbance have been determined to be the most important for supporting biological diversity (Murphy-Mariscal et al., 2015). The Project would not increase capacity nor is it anticipated that the Project would result in an increase in human disturbance within the area.

After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including bighorn sheep, mule deer, coyote, mountain lion, and desert tortoise.

Comment H7:

Commenter urges the County to address habitat loss and fragmentation in a revised CEQA document that analyzes the entire scope of the Project and takes full consideration of the opportunity to enhance wildlife connectivity.

Response:

As discussed in Section 3.21, *Mandatory Finding of Significance* of the Final IS/MND, the Project would not contribute to habitat loss or fragmentation. Because the project proposes largely in-kind replacement of the bridges, there would be no permanent change to wildlife movement following the Project. The undercrossings would be at baseline conditions or with improved clearance. After Project implementation, it is expected that the washes would continue to provide connectivity for a diversity of wildlife.

As a Covered Activity under the CVMSHCP, "take" of special-status species, including threatened and endangered species, are factored into the CVMHSCP and are mitigated for. The County has consulted with the CVCC on multiple occasions as required for projects proposing

activities that may have an impact on habitat connectivity. During consultation conducted in May 2024, the CVCC indicated that the Project is considered a replacement in-kind as the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024 the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities (see Appendix D)

Comment I – Center for Large Landscape Conservation (July 25, 2023)

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CENTER for LARGE LANDSCAPE CONSERVATION

25 July 2023

Riverside County Transportation Department
Uman Ahmed **ctolenti@rivco.org**
Frances Segovia fsegovia@rivco.org

CC: Kathryn Penrod, kristeen@scwildlands.org

RE: Replace Bridges at Stubbe Wash and Fornat Creek.

These two creeks are crucial parts of the Wildlife Linkage between the San Bernardino Mountains and the San Jacinto Mountains. As one of the chief scientists involved in designing a dozen of California's wildlife linkages (including this linkage) about 20 years ago, I cannot overemphasize how transportation structures (roads, canals, railroads) are the most serious potential destroyers of wildlife movement corridors. Intelligent building of crossing structures may not sound as glamorous as conserving large blocks of natural land, but design of crossing structures is one of the most difficult and crucial tasks in conserving such linkages. I1

Although I appreciate that restoring preconstruction conditions is a valid part of *minimizing* impacts, please consider design and management practices that could *improve* animal movement. For example, consider steps that could reduce reverberation and noise in the passageway under each bridge, and how to keep weeds and debris from blocking the passageway. Although riprap bottom has its virtues, please make part of the channel bottom support a strip of support native vegetation throughout the channel. Some animals (reptiles) may prefer riprap to smoother bottom, but others (mid-sized and larger mammals) prefer a smoother surface with vegetation. I2

The Pacific Crest Trail in Stubbe Wash must be maintained, of course, but please take steps to deter use by motorized vehicles. I3

The Coachella Valley MSHCP determined that these washes are key for sand transport into the Coachella Valley's habitat for fringe-toed lizard and other species. Please include steps that enhance sand transport. I4

Most crucially, keep in mind that at some point in the future, the adjacent bridges on I-10 and the railroad line will be enlarged to accommodate larger floodwaters and improve the potential for wildlife movement. The improvements you make here will promote better design and implementation of those improvements. Lack of such improvements on Railroad Avenue will make it seem pointless to improve the bridges on I-10 and the railroad line. Because a linkage is only as effective as its weakest link, your actions on this bridge are crucial. I5

You have an exciting opportunity to enhance the San Bernardino-San Jacinto Mountains Wildlife Linkage (http://www.scwildlands.org/reports/SCMLRegionalReport.pdf). Please take advantage of this opportunity. I would be happy to confer with your planners on this effort. I6

Sincerely,

Paul Beier
Conservation Research Fellow, Center for Large Landscape Conservation
Past President, Society for Conservation Biology
Emeritus Regents' Professor of Conservation Biology, Northern Arizona University (1992-2020)
928 699 3578

Thank you for your comments. Comments have been included within the Final Environmental Document.

Comment I1:

Commenter notes that the two creeks are crucial parts of the Wildlife Linkage between the San Bernardino Mountains and the San Jacinto Mountains and that transportation structures are the most serious potential destroyers of wildlife movement corridors. Commenter states that intelligent building of crossing structures is one of the most difficult and crucial tasks in conserving such linkages.

Response:

As documented in Section 3.21, *Mandatory Finding of Significance,* of the Final IS/MND, the Project would not contribute to habitat loss or fragmentation.

Because the project proposes largely in-kind replacement of the bridges, there would be no permanent change to wildlife movement following the Project. The undercrossings would be at baseline conditions or with improved clearance. After Project implementation, it is expected that the washes would continue to provide connectivity for a diversity of wildlife.

As a Covered Activity under the CVMSHCP, "take" of special-status species, including threatened and endangered species, are factored into the CVMHSCP and are mitigated for. The County has consulted with the CVCC on multiple occasions as required for projects proposing activities that may have an impact on habitat connectivity. During consultation conducted in May 2024, the CVCC indicated that the Project is considered a replacement in-kind as the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024 the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities (see Appendix D)

Comment I2:

Commenter recognizes that restoring preconstruction conditions is a valid part of *minimizing* impacts but recommends considering design and management practices that could *improve* animal movement. Commenter provides several examples the Project should consider to improve animal movement, including steps to reduce vibration and noise in the passageway and native vegetation throughout the channel in addition to riprap.

Response:

As described in the Final IS/MND and the NES(MI) (available on the Project website: https://rcprojects.org/railroadbridges), the San Gorgonio River and associated tributaries are valuable biological corridors. Although no specific crossing study was conducted for the proposed Project, the Fornat Wash Bridge undercrossing could potentially be used by small and medium sized wildlife, such as reptiles, small mammals, and coyote. Fornat Wash funnels wildlife to the Fornat Wash bridge underpass, which provides natural sandy bottom and atria (openings in the roof of an underpass) conducive to wildlife movement. East Channel Stubbe Wash Bridge occurs at the northern edge of the Snow Creek/Windy Point Conservation Area and connects to the biological corridor for the Stubbe and Cottonwood Canyons Conservation Area to the north. The Stubbe Wash biological corridor through the biological study area (BSA) also provides sand transport through the San Gorgonio Pass. The East Channel Stubbe Wash Bridge

undercrossing is approximately 25 feet high and does not provide live-in habitat for the majority of species due to the high levels of human disturbances (i.e., maintenance within the underpass and recreational use of the Pacific Crest Trail). However, due to the location and large arterials passing through the BSA, the underpass is expected to be used by a variety of species, potentially facilitating movement of species such as bighorn sheep, mule deer, coyote, mountain lion, and desert tortoise between the north and south sides of I-10. A separate study conducted by the University of Riverside Center for Conservation Biology evaluated the underpass at East Channel Stubbe Wash to determine wildlife movement and usage patterns (Murphey-Mariscal Barrows 2013). East Channel Stubbe Wash Bridge undercrossing contains features that promote the use of underpasses by wildlife, such as atria, shelter, cover, and natural rocky/sandy substrate. Recreational use of the Pacific Crest Trail through East Channel Stubbe Wash is not expected to appreciably affect wildlife movement through the underpass based on species' twilight and nocturnal movement patterns within desert environments (Murphey-Mariscal Barrows 2013).

To ensure continued use of the corridor, the proposed Project would also install ungrouted riprap at the southeast and southwest corners of the bridges that would extend six feet below the channel bottom. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no columns within the channel bed, which would increase the openness ratio of both bridge undercrossings. Other than the local corners, the channels would remain earthen and sandy to support continued movement for wildlife. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support current movement for wildlife. It is expected that these features and minimization measures would continue to support a successful wildlife habitat corridor for a range of species.

Comment I3:

Commenter recognizes that the Pacific Crest Trail must be maintained, but requests that steps be taken to deter motorized vehicle use of the Pacific Crest Trail within Stubbe Wash.

Response:

The East Stubbe Channel currently has bollards installed to prevent motor vehicles from using the undercrossing. Additionally, Code of Federal Regulations (CFR) 261.20 prohibits the use of motorized vehicles on the Pacific Crest Trail without a special-use authorization. The U.S. Forest Service (an agency of the U.S. Department of Agriculture) partners with the Bureau of Land Management, National Park Service, California State Parks, and the Pacific Crest Trail Association to provide effective management and protection of the Pacific Crest Trail. It is outside of the intent of this Project to implement and/or enforce additional measures that limit motorized vehicles along the Pacific Crest Trail.

Comment I4:

Commenter states that the CVMSHCP determined that the washes are key for sand transport into the Coachella Valley's habitat for fringe-toed lizard and other species. Commenter requests steps that enhance sand transport be included in the Project.

Response:

The intent of the proposed Project is to replace the existing timber bridges to address structural deficiencies and safety concerns along Railroad Avenue. While the Project acknowledges the importance of sand transport in the region, it is beyond the scope of the Project to enhance sand transport. However, the Project would implement measure **BIO-1** to ensure that all temporary construction areas would be returned to preconstruction conditions and the channel bottom would remain earthen and sandy. After Project implementation, it is expected that the washes would continue to function in the same manner as they do currently.

Comment I5:

Commenter notes that adjacent bridges on I-10 and the UPRR line will be enlarged at some point in the future to accommodate larger floodwaters and improve wildlife movement. Commenter notes that a lack of such improvements at Railroad Avenue will make it seem pointless to improve the bridges on I-10 and the UPRR line and therefore, the County's actions at these bridges are crucial.

Response:

Replacement of the existing timber bridge structures with modern concrete bridges would improve the channel cross sections over the existing condition as the modern bridges would require fewer piles within the channels. The new bridges would also increase the channel capacity by providing a wider cross section that is consistent with the existing channels. The new bridges would be designed to withstand flood events and continue to provide flood control capabilities. In addition, the bridge elevation at Fornat Wash would be increased by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The crossing at East Stubbe Channel Wash is already large enough to accommodate equestrians. It is expected that the Project design and minimization measures would continue to support a successful wildlife habitat corridor for a range of species.

Comment I6:

Commenter states that the Project is an opportunity to enhance the San Bernardino – San Jacinto Mountains Wildlife Linkage and expressed willingness to confer with Project planners.

Response:

Specific enhancements to wildlife linkages are beyond the intent of this Project. Channel washes would be returned to preconstruction conditions after the new bridges are complete and will function in the same manner as they currently do.

Comment J – Oswit Land Trust (July 27, 2023)

July 27, 2023

Dear Umar Ahmed,

Re: Draft Initial Study/Mitigated Negative Declaration for the replacement of two timber bridges for Railroad Avenue at Stubbe and Fornat Creeks in the San Bernardino-San Jacinto Mountains Linkage.

Oswit Land Trust is a 501C3 non-profit land conservancy dedicated to preserving critical habitat for wildlife corridors and sensitive species. We achieve our goals through the acquisition of land and advocacy. We are a proud member of the Land Trust Alliance and have over 3,000 active members who are residents within the Coachella Valley and beyond.

We are writing in regard to the replacement of two timber bridges for Railroad Avenue at Stubbe and Fornat Creeks in the San Bernardino-San Jacinto Mountains Linkage. We ask that the project complete a full assessment of the impacts to connectivity and threatened and endangered species through CEQA as the project is as follows:

- Coachella Valley MSHCP Biological Cores and Linkages
- Coachella Valley MSHCP Sand Source/Transport Linkages. The project area provides important role in ecosystem processes including sand transport that is critical for sustaining the habitat of desert species such as the fringed toad lizard and other species in the Coachella Valley.
- Sits in the central branch of the San Bernardino-San Jacinto Linkage, one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands, 2008).
- I-10 in this location has been identified as a 2022 Priority Wildlife Barrier for remediation by CDFW

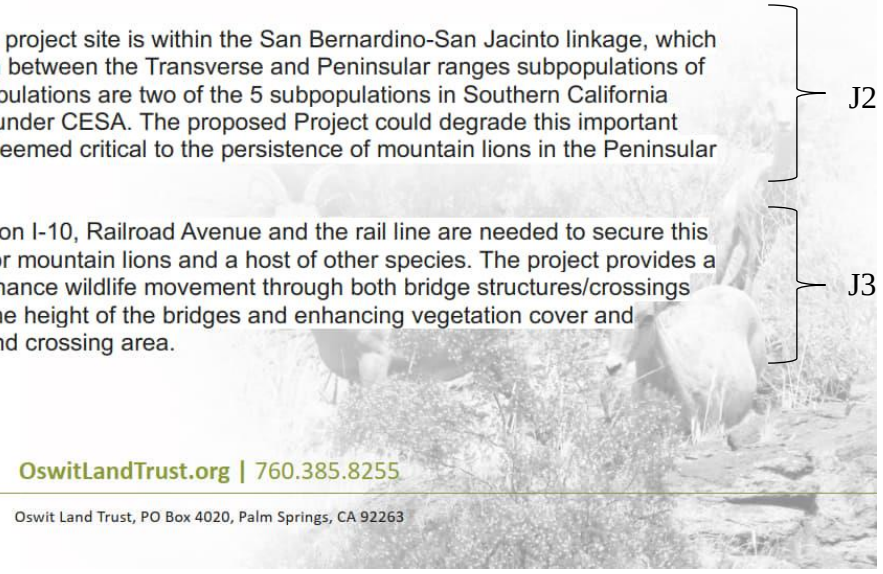
J1

In addition, please know the project site is within the San Bernardino-San Jacinto linkage, which is the only viable connection between the Transverse and Peninsular ranges subpopulations of mountain lion. These subpopulations are two of the 5 subpopulations in Southern California being considered for listing under CESA. The proposed Project could degrade this important connectivity area, which is deemed critical to the persistence of mountain lions in the Peninsular Mountain ranges.

J2

Improvements to structures on I-10, Railroad Avenue and the rail line are needed to secure this critically important linkage for mountain lions and a host of other species. The project provides a significant opportunity to enhance wildlife movement through both bridge structures/crossings by widening and elevating the height of the bridges and enhancing vegetation cover and substrate in the approach and crossing area.

J3



OswitLandTrust.org | 760.385.8255

Oswit Land Trust, PO Box 4020, Palm Springs, CA 92263

The proposed Project has the potential to amplify the barrier effects of I-10, especially given the Project's proximity to a critical riparian corridor (Stubbe Canyon) with an undercrossing that supports vegetation cover to support wildlife movement between the San Bernardino and San Jacinto mountains. J4

Caltrans District 8 Adaptation Priorities Report and associated data identifies the stretch of Interstate-10 adjacent to the Proposed Project site as vulnerable to climate change and has identified and prioritized roadways, bridges, and culverts to ensure resilience of the State Highway System. The area of Interstate-10 directly adjacent to the Proposed Project is identified as a Caltrans' Adaptation Priority 1 Roadway. Thus, expanding the openness ratio of both bridges provides an opportunity to ensure the resilience of the State Highway System and improve wildlife movement. J5

We hope you will recognize these very important points and take them into consideration. Oswit Land Trust is dedicated to ensuring wildlife and habitat that are essential to the San Bernardino-San Jacinto Mountains Linkage are protected for generations to come. J6

Sincerely,

Jane Garrison,
Executive Director Oswit Land Trust

OswitLandTrust.org | 760.385.8255

Oswit Land Trust, PO Box 4020, Palm Springs, CA 92263

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment J1:

Commenter requests a full CEQA assessment of the impacts to connectivity and threatened and endangered species because the project is in a CVMHSCP biological core and linkage area, CVMHSCP sand transport area, the San Bernardino – San Jacinto Mountains linkage, and an area identified as a 2022 Priority Wildlife Barrier for remediation by CDFW.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife corridors is provided in response to Impact (d) under subheading, *Impact Analysis*, in Section 3.4, *Biological Resources* of the Final IS/MND.

Furthermore, an analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources*, under subheading, *Wildlife Corridors,* of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife.

Section 3.4, *Biological Resources*, also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area. As the comment indicates, the Project is also located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings will be improved, with the elevation of the Fornat Wash bridge being increased by approximately two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges.

Comment J2:

Commenter states that the Project is within the San Bernardino – San Jacinto Linkage, which is the only viable connection between the Transverse and Peninsular ranges for subpopulations of mountain lion. Commenter notes that the proposed Project could degrade this important connectivity area.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet, which would increase the openness ratio of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment J3:

Commenter states that the Project provides a significant opportunity to enhance wildlife movement through the bridge structures/underpasses by widening and elevating the height of the bridge and enhancing vegetative cover and substrate and crossing areas.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment J4:

Commenter states that the Project has the potential to amplify barrier effects of I-10, especially given the proximity to Stubbe Canyon, a critical riparian corridor, which supports vegetation cover to support wildlife movement.

Response:

As discussed in the response to Impact (b) under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND, the proposed Project would have permanent impacts on less than 0.05-acre of non-wetlands, 0.05-acres of unvegetated streambed, and no impacts to riparian habitat. All Project impacts to biological corridors would be temporary.

Measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Following construction, the crossings would be restored to baseline conditions or better and will continue to provide vegetation cover to support wildlife movement. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife.

Comment J5:

Commenter notes that Caltrans District 8 has identified the area directly adjacent to the Project as Priority 1 in the Adaptation Priorities Report and suggests that expanding the openness ratio of both bridges provides an opportunity to ensure resilience of the State highway system and to improve wildlife movement.

Response:

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings would be improved, with the elevation of the Fornat Wash bridge being increased by approximately two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment J6:

Commenter emphasizes that the Project consider the points made in the comment letter and that they are dedicated to conservation of the San Bernardino – San Jacinto Mountains linkage.

Response:

Comment noted and has been considered in the Final Environmental Document.

Comment K – SC Wildlands (July 27, 2023)

SC Wildlands
Science & Collaboration for Connected Wildlands
P.O. Box 1052, Fair Oaks, CA 95628
www.scwildlands.org

July 27, 2023

Riverside County Transportation Department
Uman Ahmed ctolenti@rivco.org
Frances Segovia fsegovia@rivco.org

Subject: Railroad Avenue Bridges IS/MND

Thank you for the opportunity to comment on the Railroad Avenue Bridges Project Initial Study with (Proposed) Mitigated Negative Declaration. SC Wildlands' mission is to protect and restore systems of connected wildlands that support native species and the ecosystems upon which they rely. As such, our comments largely focus on the potential impacts of the proposed project on habitat connectivity and wildlife movement corridors and the need to incorporate additional mitigation measures to ensure wildlife movement is improved.

The intent of CEQA is to provide full disclosure of the potential environmental impacts of a proposed project for public review. The IS/PMND for the Railroad Avenue Bridges Project did not sufficiently evaluate potential adverse impacts of the proposed project on habitat connectivity and wildlife movement for native resident or migratory wildlife species, including federally and state listed and candidate species, and established wildlife corridors as required by CEQA. K1

The San Bernardino-San Jacinto Linkage is one of 15 priority linkages needed to establish and ecologically viable network of wildlands across southern California's South Coast Ecoregion, stretching from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands 2008). This area has also been prioritized as Biological Linkages and Sand Source and Transport Corridors, which are covered by the Coachella Valley Multiple Species Habitat Conservation Plan, which is intended to conserve live-in and move-through habitat for numerous imperiled species. This linkage is especially important because it provides the only viable connection between the Transverse and Peninsular Ranges subpopulations of mountain lions. These subpopulations are two of the 5 subpopulations in Southern California being considered for listing under CESA. Maintaining and restoring connectivity and improving wildlife crossing infrastructure provides important long-term insurance for ecosystem viability. K2

Improvements to structures on I-10, Railroad Avenue and the rail line are needed to secure this critically important linkage for wildlife movement, as well as, to improve areas of the State Highway System that have been deemed vulnerable to climate change. California Department of Fish and Wildlife has identified this stretch of I-10 as a 2022 Priority Wildlife Barrier for K3

remediation. Caltrans District 8 has identified Interstate 10 directly adjacent to the proposed project site as a number 1 Adaptation Priority for ensuring the resilience of the State Highway System under a changing climate. It is critical that all transportation improvement projects consider vulnerability of the State Highway System due to increases in precipitation and wildfire as a result of climate change and incorporate design considerations into transportation projects to ensure resilience of the State Highway System. At some point in the future, the adjacent bridges on I-10 and the railroad line will be enlarged to accommodate larger floodwaters and improve the potential for wildlife movement. Expanding the openness ratio of both bridges on Railroad Avenue provides an opportunity to ensure the resilience of the State Highway System and improve wildlife movement.

K3 Cont.

Based on the monumental importance of this linkage, a finding of Significance is warranted for this proposed project. While culvert replacements are a covered activity under the MSHCP, bridge replacements are not explicitly listed as a covered activity. The project provides a significant opportunity to enhance wildlife movement through both bridge structures/crossings by widening and elevating the height of the bridges and enhancing vegetation cover and substrate in the approach and crossing area. Mitigation measures to reduce the barrier effects of noise and light in the passageway under each bridge are also needed. Mitigation measures must be commensurate to ensure these regionally important linkages remain viable.

K4

Respectfully Submitted,

Kristeen Penrod

Kristeen Penrod, Director

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment K1:

Commenter states that the IS/MND did not sufficiently evaluate potential adverse impacts to habitat connectivity and wildlife movement as required by CEQA and needs to incorporate additional mitigation measures to ensure wildlife movement is improved.

Response:

Section 3.4, *Biological Resources,* Environmental Setting section under subheading, *Wildlife Corridors,* in the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. Furthermore, the section acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area. An analysis of temporary impacts to wildlife crossings is provided in threshold d) under *Impact Analysis* in the Final IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, under response to Impact (a). All impacts to the biological corridors would be temporary and limited to construction of Project. It is expected that the Project design and minimization measures identified throughout this document would continue to support a successful wildlife habitat corridor for a range of species.

Comment K2:

Commenter notes that the San Bernardino – San Jacinto Linkage is one of 15 priority linkages needed to establish an ecologically viable network of wildlands and that the area has been prioritized as Biological Linkages and Sand Source and Transport Corridors covered by the CVMSHCP. Commenter notes that the linkage is important because it provides the only viable connection between the Transverse and Peninsular Mountain Ranges subpopulations of mountain lions, which are two of five subpopulations being considered for listing under CESA. Commenter states that maintaining and restoring connectivity and improving wildlife crossing infrastructure provides important long-term insurance for ecosystem viability.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet, which would increase the openness ratio of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings. The Project would also install ungrouted riprap at the southeast and southwest corners of the bridges that would extend six feet below the channel bottom.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued

movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment K3:

Commenter states that this stretch of I-10 is identified as a 2022 Priority Wildlife Barrier for remediation, and that I-10 adjacent to the project site is the number one adaptation priority for ensuring resiliency of the State Highway System. Commenter suggests that all transportation projects consider climate change resiliency, particularly as it relates to increases in precipitation and wildfire. Commenter suggests that expanding the openness ratio of both bridges on Railroad Avenue provides an opportunity to ensure resiliency of the State Highway System and to improve wildlife movement.

Response:

The subject bridges are off the State Highway System and mostly serve local traffic from the Cabazon community. Periodically, the road carries detoured traffic from I-10 when the freeway is temporarily closed for construction or emergency incidents. A scour Plan of Action was performed on the bridges by the County in 2013, which recommended total replacement of the bridges due to the extent of the scour, structural instability, and deterioration of various bridge elements. Replacing the timber bridges with modern concrete bridges would improve their structural integrity and resiliency.

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. The replacement bridges would be single-span structures requiring no columns within the channel bed, which would increase the openness ratio of both bridge undercrossings. Additionally, the Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to maintain sufficient freeboard (space) between the bridge deck and storm discharge design depth, which would increase the openness of the undercrossing. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project and does not meet the intent of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians.

Furthermore, providing a wide range of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10 that supports wildlife movement of a diversity of wildlife species, in addition to reducing human disturbance has been determined to be the most important for supporting biological diversity (Murphy-Mariscal et al., 2015). The Project would not increase capacity nor is it anticipated that the Project would result in an increase in human disturbance within the area.

Comment K4:

Commenter states that bridge replacements are not explicitly listed as a covered activity under the MSHCP and that a finding of significance is warranted due to the importance of this linkage.

Commenter notes that the Project provides a significant opportunity to enhance wildlife movement. Commenter states that mitigation measures are needed to reduce barrier effects of noise and light and measures should be commensurate to ensure viability of wildlife linkages.

Response:

The Project team has coordinated with the CVCC to ensure compliance with the CVMSHCP. The CVCC confirmed in April and September 2019 and reconfirmed in a public comment letter to the Draft IS/MND dated July 21, 2023 (see Comment G1), that the Project is a Covered Activity per section 7.3.1.1 of the CVMSHCP. During additional consultation conducted between February and May of 2024, the CVCC reconfirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance (O&M), as described in Section 7.3.1.1 of the CVMSHCP (see letter dated May 22, 2024, Appendix D). Additionally, during a meeting with the CVCC in May 2024, the CVCC indicated that the Project is considered an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring.

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet freeboard requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings. As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity and support wildlife movement for a diversity of species. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Furthermore, as described in Section 3.1, *Aesthetics and Visual Resources*, of the Final IS/MND, the Project would not install any new permanent lighting and construction would primarily be limited to daylight hours. If lighting is necessary, it will be minimized to only what is required for directional and safety purposes. Additionally, as described in Section 3.13, *Noise*, noise-related impacts would be temporary and intermittent, and would cease upon Project completion. The Project would not have a significant impact on the movement of any native resident migratory wildlife species or wildlife corridors; therefore, mitigation is not required.

Comment L – Friends of Big Morongo Canyon Preserve (July 27, 2023)

From: Kevin Wong <director.bmcp@gmail.com>
Sent: Thursday, July 27, 2023 10:47 AM
To: Tolentino, Cesar <CTolenti@RIVCO.ORG>
Subject: Timber bridges for Railroad Avenue at Stubbe and Fornat Creeks

Dear Mr. Ahmed:

The Friends of Big Morongo Canyon Preserve request a full environmental assessment of impacts to connectivity and threatened and endangered species through CEQA for the Declaration for the replacement of two timber bridges for Railroad Avenue at Stubbe and Fornat Creeks. The projects fall within the San Bernardino-San Jacinto Mountains Linkage. A full review is needed as the project is within:

Coachella Valley MSHCP Biological Cores and Linkages

Coachella Valley MSHCP Sand Source/Transport Linkages. The project area provides important role in ecosystem processes including sand transport that is critical for sustaining the habitat of desert species such as the fringed toad lizard and other species in the Coachella Valley

Sits in the central branch of the San Bernardino-San Jacinto Linkage, one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands, 2008).

I-10 in this location has been identified as a 2022 Priority Wildlife Barrier for remediation by CDFW

The project site is within the San Bernardino-San Jacinto linkage, which is the only viable connection between the Transverse and Peninsular ranges subpopulations of mountain lion. These subpopulations are two of the 5 subpopulations in Southern California being considered for listing under CESA. The proposed Project could degrade this important connectivity area, which is deemed critical to the persistence of mountain lions in the Peninsular Mountain ranges.

Improvements to structures on I-10, Railroad Avenue and the rail line are needed to secure this critically important linkage for mountain lions and a host of other species. The project provides a significant opportunity to enhance wildlife movement through both bridge structures/crossings by widening and elevating the height of the bridges and enhancing vegetation cover and substrate in the approach and crossing area.

The proposed Project has the potential to amplify the barrier effects of I-10, especially given the Project's proximity to a critical riparian corridor (Stubbe Canyon) with an undercrossing that supports vegetation cover to support wildlife movement between the San Bernardino and San Jacinto mountains.

Caltrans District 8 Adaptation Priorities Report and associated data identifies the stretch of Interstate 10 adjacent to the Proposed Project site as vulnerable to climate change and has identified and prioritized roadways, bridges, and culverts to ensure resilience of the State Highway System. The area of Interstate-10 directly adjacent to the Proposed Project is identified as a Caltrans' Adaptation Priority 1 Roadway. Thus, expanding the openness ratio of both bridges provides an opportunity to ensure the resilience of the State Highway System and improve wildlife movement.

The bridge replacements are far beyond the scope of Operations and Maintenance Activities as defined by the CVMSHCP and should require a complete environmental assessment.

Sincerely,

Kevin Wong, Executive Director

Representing the Board of Directors, Friends of Big Morongo Canyon Preserve

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Kevin Wong, Executive Director
*(Please be advised *in general* my days off are Tuesdays and Wednesdays)*
Friends of Big Morongo Canyon Preserve -
11055 East Drive/P.O. Box 780
Morongo Valley, CA 92256
Direct Line (Cell) 760-792-1843
Emergency: 760-910-1420

L1

L2

L3

L4

L5

L6

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment L1:

Commenter requests a full CEQA assessment of the impacts to connectivity and threatened and endangered species because the project is in the CVMHSCP biological core and linkage area, CVMHSCP sand transport area, the San Bernardino – San Jacinto Mountains linkage, and an area identified as a 2022 PWB for remediation by CDFW.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife corridors is provided in response to Impact (d) under subheading, *Impact Analysis*, in Section 3.4, *Biological Resources* of the Final IS/MND.

An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources,* under subheading, *Wildlife Corridors,* of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support current movement for wildlife. Section 3.4, *Biological Resources*, also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area.

As the comment indicates, the Project is also located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing under crossings would be retained. Additionally, the openness ratio of the under crossing will be improved, with the elevation of the Fornat Wash bridge being increased by up to two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges.

Comment L2:

Commenter states that the Project is within the San Bernardino – San Jacinto Linkage, which is the only viable connection between the Transverse and Peninsular ranges for subpopulations of mountain lion. Commenter notes that the proposed Project could degrade this important connectivity area.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet, which would increase the openness ratio of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings. The Project would also install ungrouted riprap at the southeast and southwest corners of the bridges that would extend six feet below the channel bottom.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment L3:

Commenter states that the Project provides a significant opportunity to enhance wildlife movement through the bridge structures/underpasses by widening and elevating the height of the bridge and enhancing vegetative cover and substrate and crossing areas.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians). Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment L4:

Commenter states that the Project has the potential to amplify barrier effects of I-10, especially given the proximity to Stubbe Canyon, a critical riparian corridor, which supports vegetation cover to support wildlife movement.

Response:

As discussed in the response to Impact (b) under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND, the proposed Project would have permanent impacts on less than 0.05-acre of non-wetlands, 0.05-acres of unvegetated streambed, and no impacts to riparian habitat. All Project impacts to biological corridors would be temporary.

Measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife.

Comment L5:

Commenter notes that Caltrans District 8 has identified the area directly adjacent to the Project as Priority 1 in the Adaptation Priorities Report and suggests that expanding the openness ratio of both bridges provides an opportunity to ensure resilience of the State highway system and to improve wildlife movement.

Response:

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained.

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment L6:

Commenter states that the bridge replacement Project is beyond the scope of Operations and Maintenance as defined by the CVMSHCP and should require an EA.

Response:

The Project team has coordinated with the CVCC to ensure compliance with the CVMSHCP. The CVCC confirmed in April and September 2019 and reconfirmed in a public comment letter to the IS/MND dated July 21, 2023 (see Comment G1), that the Project is a Covered Activity per section 7.3.1.1 of the CVMSHCP. During additional consultation conducted between February and May of 2024, the CVCC reconfirmed that Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance (O&M), as described in Section 7.3.1.1 of the CVMSHCP (see letter dated May 22, 2024, Appendix D). Additionally, during a meeting with the CVCC in May 2024, the CVCC noted that the Project is considered an O&M activity because it is essentially an in-kind replacement as it is not increasing the bridge footprint or proposing any improvements above and beyond the existing scope of work as demonstrated through the new bridges having similar dimensions as the old bridges and not proposing any channel armoring.

Comment M – Tyler Millan (July 25, 2023)

From: Tyler Millan <millan22tyler@gmail.com>
Sent: Tuesday, July 25, 2023 11:55 AM
To: Tolentino, Cesar <CTolenti@RIVCO.ORG>
Subject: Umar ahmed-Railroad avenue bridges to be replaced at Stubbed and fornat creeks

Dear Umar Ahmed with Riverside County Transportation Department,

I am writing this letter to comment on the replacement of the Railroad Avenue bridges at Stubbe and Fornat Creeks in the San Bernardino-San Jacinto Mountains Linkage. I would like to recommend that the project complete a full assessment of impacts to connectivity and threatened and endangered species through CEQA.

Because this project is located in the Coachella Valley MSHCP Biological Cores and Linkages area, it will be an important part in ecosystem processes such as sand transport needed for habitat of desert species. It also sits in the central branch of the San Bernardino-San Jacinto Linkage, one of 15 South Coast missing linkages considered vital to regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada. CDFW identified the I-10 in this location as a 2022 Priority Wildlife Barrier for remediation. M1

The project should be designed to enhance wildlife connectivity between the Transverse and Peninsular ranges to support subpopulations of mountain lion. These subpopulations are two of the 5 subpopulations in Southern California being considered for listing under CESA. M2

The project provides a significant opportunity to enhance wildlife movement through both bridge structures/crossings by widening and elevating the height of the bridges and enhancing vegetation cover and substrate in the approach and crossing area. M3

The proposed Project has the potential to amplify the barrier effects of I-10, especially given the Project's proximity to a critical riparian corridor (Stubbe Canyon) with an undercrossing that supports vegetation cover to support wildlife movement between the San Bernardino and San Jacinto mountains. M4

Caltrans District 8 Adaptation Priorities Report and associated data identifies the stretch of Interstate 10 adjacent to the Proposed Project site as vulnerable to climate change and has identified and prioritized roadways, bridges, and culverts to ensure resilience of the State Highway System. The area of Interstate-10 directly adjacent to the Proposed Project is identified as a Caltrans' Adaptation Priority 1 Roadway. Thus, expanding the openness ratio of both bridges provides an opportunity to ensure the resilience of the State Highway System and improve wildlife movement. M5

Thank you for taking the time to read my letter and recommendations.

Sincerely,
Tyler Millan

Thank you for your comments. Comments have been included within the Final Environmental Document.

Comment M1:

Commenter requests a full assessment of the impacts to connectivity and threatened and endangered species because the project is in a CVMHSCP biological core and linkage area, CVMHSCP sand transport area, the San Bernardino – San Jacinto Mountains linkage, and an area identified as a 2022 PWB for remediation by CDFW.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife corridors is provided in response to Impact (d) under subheading, *Impact Analysis,* in Section 3.4, *Biological Resources* of the Final IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources,* under subheading, *Wildlife Corridors,* of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. Section 3.4, *Biological Resources,* also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area.

As the comment indicates, the Project is also located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings will be improved, with the elevation of the Fornat Wash bridge being increased by up to two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges.

Comment M2:

Commenter recommends that the Project be designed to enhance wildlife connectivity to support subpopulations of mountain lion.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by up to two feet, which would increase the openness ratio of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate

equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment M3:

Commenter states that the Project provides a significant opportunity to enhance wildlife movement through the bridge structures/underpasses by widening and elevating the height of the bridge and enhancing vegetative cover and substrate and crossing areas.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by up to two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment M4:

Commenter states that the Project has the potential to amplify barrier effects of I-10, especially given the proximity to Stubbe Canyon, a critical riparian corridor, which supports vegetation cover to support wildlife movement.

Response:

As discussed in response to Impact (b), under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND, the proposed Project would have permanent impacts on less than 0.05-acre of non-wetlands, 0.05-acres of unvegetated streambed, and no impacts to riparian habitat. All Project impacts to biological corridors would be temporary.

Measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Following

construction, the crossings would be restored to baseline conditions or better and will continue to provide vegetation cover to support wildlife movement. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife.

Comment M5:

Commenter noted that Caltrans District 8 has identified the area of I-10 directly adjacent to the Project as a Priority 1 roadway and suggests that expanding the openness ratio of both bridges provides an opportunity to ensure resilience of the State highway system and to improve wildlife movement.

Response:

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings would be improved, with the elevation of the Fornat Wash bridge being increased by up to two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b))..

Comment N – Mary Rosczyk (July 24, 2023)

From: MARY ROSCZYK <mrosczyk@verizon.net>
Sent: Monday, July 24, 2023 4:43 PM
To: Tolentino, Cesar <CTolenti@RIVCO.ORG>
Subject: Bridge replacements on I-10 Freeway

Dear Umar Ahmed,

I do not dispute the fact that that the timber bridges for Railroad Ave. at Stubbs Creek and Fornat Creek need to be replaced. However, as a member of the Mountain Lion Foundation, I write to emphasize that in replacing them that the two bridges be both higher and wider to facilitate wildlife movement. N1

I suggest these changes because of the bridges proximity to the Stubbe Canyon riparian corridor which is critical to movement between the San Bernardino and San Jacinto Mountains. Vegetation cover at the undercrossing should also be enhanced to make it a more desirable connection for wildlife. N2

This Project sits in the central branch of the San Bernardino-San Jacinto Linkage, which is one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada Mountains. N3

Thank you for the opportunity to comment.

Sincerely,
Mary Lou Rosczyk
24435 Village Walk Place, #306
Murrieta, CA 92562

Thank you for your comments. Comments have been included within the Final Environmental Document.

Comment N1:

Commenter emphasizes that the replacement bridges be higher and wider to accommodate wildlife movement.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by up to two feet to meet free-board requirements, which would increase the openness of the undercrossing. The freeboard requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

Comment N2:

Commenter suggests enhancement of vegetation cover at the undercrossings to increase desirability for wildlife connection.

Response:

Measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Following construction, the crossings would be restored to baseline conditions and will continue to provide vegetation cover to support wildlife movement.

Comment N3:

Commenter states that the Project sits at the central branch of the San Bernardino – San Jacinto Linkage, one of the South Coast Missing Linkages considered vital to regional connectivity.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife corridors is provided in response to Impact (d) under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources,* under subheading, *Wildlife Corridors,* of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**,

all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife.

Comment O – Pam Nelson (July 27, 2023)

From: Pam Nelson <pamela05n@yahoo.com>
Sent: Thursday, July 27, 2023 12:55 PM
To: Tolentino, Cesar <CTolenti@RIVCO.ORG>
Subject: Railroad Avenue at Stubbe and Fornat Creeks bridges

Good afternoon, Umar Ahmed,
As a member of the San Gorgonio Chapter of the Sierra Club, I keep up on environmental issues in Riverside, particularly, and San Bernardino counties. The proposed replacement of two bridges on Railroad Avenue caught my attention because, as most areas in S. California, our wildlife habitat has become extremely fragmented by infrastructure. This is the time that we need to do what we can to rectify some of our blunders. This project is a good opportunity to make a difference and help restore wildlife habitat and connectivity.

Below are comments to that affect:
1) **complete a full assessment** of impacts to connectivity and threatened and endangered species through CEQA as the project is within Coachella Valley MSHCP Biological Cores and Linkages. This would include the importance of the project area for its role in ecosystem processes including sand transport that is critical for sustaining the habitat of desert species such as the fringed toad lizard and other species in the Coachella Valley O1
2) It sits in the **central branch of the San Bernardino-San Jacinto Linkage**, one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands, 2008). This linkage, is the only viable connection between the Transverse and Peninsular ranges subpopulations of mountain lion. These subpopulations are two of the 5 subpopulations in Southern California being considered for listing under CESA. The proposed Project could degrade this important connectivity area, which is deemed critical to the persistence of mountain lions in the Peninsular Mountain ranges. O2
3) I-10 in this location has been identified as a **2022 Priority Wildlife Barrie**r for remediation by CDFW O3
4) **Improvements to structures on I-10, Railroad Avenue and the rail line** are needed to secure this critically important linkage for mountain lions and a host of other species. The project provides a significant opportunity to enhance wildlife movement through both bridge structures/crossings by widening and elevating the height of the bridges and enhancing vegetation cover and substrate in the approach and crossing area. O4
5) The proposed Project has the potential to **amplify the barrier effects** of I-10, especially given the Project's proximity to a critical riparian corridor (Stubbe Canyon) with an undercrossing that supports vegetation cover to support wildlife movement between the San Bernardino and San Jacinto mountains. O5
6) **Caltrans District 8 Adaptation Priorities Report** and associated data identifies the stretch of Interstate 10 adjacent to the Proposed Project site as vulnerable to climate change and has identified and prioritized roadways, bridges, and culverts to ensure resilience of the State Highway System. The area of Interstate-10 directly adjacent to the Proposed Project is identified as a Caltrans' Adaptation Priority 1 Roadway. Thus, expanding the openness ratio of both bridges provides an opportunity to ensure the resilience of the State Highway System and improve wildlife movement. O6

As you can see, this project has major impacts to the area's ecosystem. This is an opportunity to do things right, this time.

Sincerely,
Pam Nelson

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment O1:

Commenter states that a full assessment of impacts on connectivity and threatened and endangered species be completed. Commenter states that the Project is within a CVMSHCP biological core and linkage area. Commenter notes the importance of the Project area for the fringe-toed lizard and other species in the Coachella Valley.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife corridors is provided in response to Impact (d) under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources*, under subheading, *Wildlife Corridors*, of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife.

Comment O2:

Commenter states that the Project sits at the central branch of the San Bernardino – San Jacinto Linkage, one of the South Coast Missing Linkages deemed critical to the persistence of the mountain lion in the Peninsular Mountain ranges.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by up to two feet, which would increase the openness ratio of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment O3:

Commenter states that the I-10 in this location has been identified as a 2022 Priority Wildlife Barrier for remediation for CDFW and states that this is critical for the persistence of mountain lions in the Peninsular Mountain ranges.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife crossings is provided in response to Impact (d) under subheading, *Impact Analysis*, in Section 3.4, *Biological Resources* of the Final is IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources*, under subheading, *Wildlife Corridors*, of the Final IS/MND has been modified to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. Section 3.4, *Biological Resources*, also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area.

Also as noted in the comment, the Project is a part of the I-10 Banning Pass 2022 PWB for Remediation (CDFW) which means that this highway segment has been identified as a connectivity barrier for wildlife, including target species mule deer, mountain lion, black bear, and bighorn sheep. The length of this barrier is approximately 16.6 miles. All Project impacts to biological corridors would be temporary. While wildlife connectivity is an ongoing issue and is important for the persistence of many species in the region, the Project design and minimization measures identified throughout this document would continue to support a successful wildlife habitat corridor for a range of species.

Comment O4:

Commenter states that the Project provides a significant opportunity to enhance wildlife movement through the bridge structures/underpasses by widening and elevating the height of the bridge and enhancing vegetative cover and substrate and crossing areas.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by up to two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the

replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment O5:

Commenter states that the Project has the potential to amplify barrier effects of I-10, especially given its proximity to Stubbe Canyon, a critical riparian corridor that supports vegetation cover to support wildlife movement.

Response:

As discussed in response to Impact (b) under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND, the proposed Project would have permanent impacts on less than 0.05-acre of non-wetlands, 0.05-acres of unvegetated streambed, and no impacts to riparian habitat. All Project impacts to biological corridors would be temporary.

Measure BIO-1 would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Following construction, the crossings would be restored to baseline conditions or better and will continue to provide vegetation cover to support wildlife movement. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife.

Comment O6:

Commenter noted that Caltrans District 8 has identified the area of I-10 directly adjacent to the Project as a Priority 1 roadway and suggests that expanding the openness ratio of both bridges provides an opportunity to ensure resilience of the State highway system and to improve wildlife movement.

Response:

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings would be improved, with the elevation of the Fornat Wash bridge being increased by up to two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. After Project

implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment P – Kim Floyd (July 27, 2023)

From: kimffloyd@fastmail.com <kimffloyd@fastmail.com>
Sent: Thursday, July 27, 2023 2:36 PM
To: Tolentino, Cesar <CTolenti@RIVCO.ORG>
Subject: Railroad Avenue at Stubbe and Fornat Creeks Bridges

Thank you for the opportunity to comment on this important issue. As an active environmentalist in the area for the past 30 years I keep a close eye on changes to our projects that will impact our environment. As we all now understand, we have caused the fragmentation of wildlife habitat through our various development projects including railroads, freeways, housing and other land use projects.

It is critical that we complete a full assessment of impacts to connectivity and threatened and endangered species through CEQA as the project is within Coachella Valley MSHCP Biological Cores and Linkages. This would include the importance of the project area for its role in ecosystem processes including sand transport that is critical for sustaining the habitat of desert species such as the fringed toad lizard and other species in the Coachella Valley — P1

This project sits in the **central branch of the San Bernardino-San Jacinto Linkage,** one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands, 2008). This linkage, is the only viable connection between the Transverse and Peninsular ranges subpopulations of mountain lion. These subpopulations are two of the 5 subpopulations in Southern California being considered for listing under CESA. The proposed Project could degrade this important connectivity area, which is deemed critical to the persistence of mountain lions in the Peninsular Mountain ranges.
3) I-10 in this location has been identified as a **2022 Priority Wildlife Barrie**r for remediation by CDFW — P2

We need Improvements to structures on I-10, Railroad Avenue and the rail line to secure this critically important linkage for mountain lions and a host of other species. The project provides a significant opportunity to enhance wildlife movement through both bridge structures/crossings by widening and elevating the height of the bridges and enhancing vegetation cover and substrate in the approach and crossing area. — P3

The proposed Project has the potential to **amplify the barrier effects** of I-10, especially given the Project's proximity to a critical riparian corridor (Stubbe Canyon) with an undercrossing that supports vegetation cover to support wildlife movement between the San Bernardino and San Jacinto mountains. — P4

Caltrans District 8 Adaptation Priorities Report and associated data identifies the stretch of Interstate 10 adjacent to the Proposed Project site as vulnerable to climate change and has identified and prioritized roadways, bridges, and culverts to ensure resilience of the State Highway System. The area of Interstate-10 directly adjacent to the Proposed Project is identified as a Caltrans' Adaptation Priority 1 Roadway. Thus, expanding the openness ratio of both bridges provides an opportunity to ensure the resilience of the State Highway System and improve wildlife movement. — P5

Please keep in mind how important this process is to help remediate some of the already existing damage to our wildlife habitat in this critical area. — P6

Sincerely,
Kim F Floyd
44579 Sorrento CT
Palm Desert, CA 92260

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment P1:

Commenter states that a full CEQA assessment of impacts on connectivity and threatened and endangered species be completed. Commenter notes that the Project is within the CVMSHCP biological core and linkage area and that the assessment should include the importance of the Project area for its role ecosystem processes including sand transport, which is critical for sustaining habitat of desert species, such as the fringe-toed lizard and other species in the Coachella Valley.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. As noted in the comment, the Project is within the CVMSHCP biological core and linkage area and is included as a Covered Activity. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing).

An analysis of temporal impacts to wildlife crossings is provided in response to Impact (d) under subheading, *Impact Analysis,* in Section 3.4, *Biological Resources* of the Final IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources*, under subheading, *Wildlife Corridors,* of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. Section 3.4, *Biological Resources,* also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area.

Comment P2:

Commenter states that the Project sits at the central branch of the San Bernardino – San Jacinto Linkage, one of the South Coast Missing Linkages, deemed critical to the persistence of the mountain lion in the Peninsular Mountain ranges. Commenter states that I-10 in this location has been identified as a 2022 PWB for remediation for CDFW.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet, which would increase the openness ratio of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings. The Project would

also install ungrouted riprap at the southeast and southwest corners of the bridges that would extend six feet below the channel bottom.

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

As noted in the comment, the Project is a part of the I-10 Banning Pass 2022 Priority Wildlife Barrier for Remediation (CDFW) which means that this highway segment has been identified as a connectivity barrier for wildlife, including target species such as mule deer, mountain lion, black bear, and bighorn sheep. The length of this barrier is approximately 16.6 miles. All Project impacts to biological corridors would be temporary. While wildlife connectivity is an ongoing issue and is important for the persistence of many species in the region, the Project design does not impact wildlife connectivity and minimization measures identified throughout this document would continue to support a successful wildlife habitat corridor for a range of species. The Project would not result in a cumulative impact on wildlife connectivity in the region.

Comment P3:

Commenter states that the project provides a significant opportunity to enhance wildlife movement through the bridge structures/underpasses by widening and elevating the height of the bridges and enhancing vegetative cover and substrate in the approach and crossing areas.

Response:

The Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project and does not meet the intent of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment P4:

Commenter states that the Project has the potential to amplify barrier effects, especially given its proximity to Stubbe Canyon, a critical riparian corridor that supports vegetation cover.

Response:

As discussed in response to Impact (b) under subheading, *Impact Analysis* in Section 3.4, *Biological Resources* of the Final IS/MND, the proposed Project would have permanent impacts on less than 0.05-acre of non-wetlands, 0.05-acres of unvegetated streambed, and no impacts to riparian habitat. All Project impacts to Biological Corridors would be temporary.

Measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Following construction, the crossings would be restored to baseline conditions or better and will continue to provide vegetation cover to support wildlife movement. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife.

Comment P5:

Commenter noted that Caltrans District 8 has identified the area of I-10 directly adjacent to the Project as Priority 1 roadway and suggests that expanding the openness ratio of both bridges provides an opportunity to ensure resilience of the State highway system and to improve wildlife movement.

Response:

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep.

All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and its existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings would be improved, with the elevation of the Fornat Wash bridge being increased by approximately two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife. **Per CEQA,** mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment P6:

Commenter requests that the Project keep in mind the importance of remediating existing damage to wildlife habitat in this critical area.

Response:

As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Once construction is completed, the Project area would be returned to baseline conditions or better.

The Project design and minimization measures identified throughout this document would continue to support a successful wildlife habitat corridor for a range of species. CEQA Guidelines do not require Projects to remediate or mitigate for damage that is not caused by the Project or existing damage. As documented throughout the Final IS/MND, the Project is a bridge replacement project and it is beyond the scope of this Project to remediate existing damage to wildlife habitat.

Comment Q – Geary Hund (July 27, 2023)

Geary Hund
8562 Old Vine Road
Joshua Tree, California 92252

July 27, 2023

Umer Ahmed
Engineering Project Manager
Riverside County Transportation Department
2950 Washington St, Riverside, CA 92504

Dear Umer:

I am writing to provide the following comments on Draft Initial Study/Mitigated Negative Declaration for the proposed Railroad Avenue Bridge Replacement over Fornat Wash (Br. No.56C0099) and the East Channel Stubbe Wash (Br. No. 56C0101).

I have extensive knowledge of the project area. I served as Associate Director of the Coachella Valley Mountains Conservancy from 2007 to 2010, as a Senior Fish and Wildlife Biologist with the Palm Springs Office of the United States Fish and Wildlife Service (USFWS) from 2010-2019, and as Executive Director of the Mojave Desert Land Trust from 2019 until my retirement in 2021. Earlier in my career, I was an ecologist with California State Parks. I've worked extensively on the evaluation and preservation of habitat linkages and reserves, California Environmental Quality Act (CEQA) compliance, and the implementation of the Federal Endangered Species Act and other federal and state statutes.

Proposed Mitigation Measures

The document relies on the implementation of mitigation measures to reduce project impacts. Following are comments on BIO-1 and BIO-9.

BIO – 1 Post-construction, all temporary construction areas, and the area under the bridge replacements will be returned to preconstruction contours, soils decompacted, and hydroseeded with a native seed mix.

Supplementing impoverished seed banks and improving the seed bed in arid lands often fails (DeFalco et al., 2010). To understand these failures, DeFalco et al., evaluated seedbed treatments. They found that creating surface roughness while reducing bulk density (harrowing) promoted seedling emergence. While BIO-1 does include decompaction, no detail is provided about how surface roughness will be created and maintained to promote seed germination and growth. For example, will a seed imprinter be used? Seed imprinters are used in a variety of environments but are particularly effective in arid areas. Imprints funnel water toward seedlings, protect them from wind, and concentrate nutrients for plant growth.

Q1

As to the proposed hydroseeding, DeFalco et al. (2010), found that tackifiers, used as a glue for hydroseed treatments, was largely ineffective, thus the need to ensure surface roughness through a technique such as imprinting.

BIO-1 does not provide a plant pallet (list of species) for the native seed mix, nor does it say where the seed will be obtained. Using plant species found in the project area, and collecting seed locally, helps to ensure the success of the re-vegetation, because the species of plants found at the site are adapted to local conditions. Using locally collected seed will also prevent the dilution of the gene pool in adjacent vegetation. As stated in DeFalco et al. (2010), future success of broadcast seeding in arid lands depends on evaluating disturbance characteristics prior to seeding and selecting appropriate species and seasons for application.

Even with seedling emergence, there is often very little if any vegetation establishment due to low rainfall subsequent to planting, herbivory by harvester ants and rodents, and competition with non-native plants. To help ensure that native vegetation becomes established, seeding should be combined with outplanting (plants germinated and established in a nursery), followed by irrigation until plants are established. Abella et al. (2012), had success with outplanting when seeding in an arid environment failed.

BIO-1 does not include planting any vegetation in or adjacent to the wash in the approaches to the bridge. Planting native shrubs in the approaches, such as desert willow (*Chilopsis linearis*), which the Mitigated Negative Declaration (MND) indicates is present in the area, would provide cover for wildlife, encouraging them to use the crossing. It would also help to prevent stream scour which can also impede or prevent wildlife movement.

BIO-1 does not include a weed control plan. Invasive non-native plants frequently outcompete native plants, especially native annuals, and they are particularly good at invading recently disturbed areas. The lack of a weed control plan could result in failure of the re-vegetation effort.

BIO-1 does not include performance standards and remediation measures if they are not met. These are needed to ensure the success of the re-vegetation effort.

In summary, the MND relies on BIO-1 as one means of reducing project impacts to less than significant. However, it does not include a number of necessary measures to ensure its success. Without additional measures, BIO-1 is insufficient to mitigate for project impacts to vegetation and wildlife – see additional comments below.

Q1

BIO-9: Preconstruction Survey for Nesting Birds. If construction activities are initiated during the bird breeding season (defined as February 15 through September 15), a preconstruction survey by a qualified biologist will occur within three days prior to construction activities. The survey will occur within all suitable nesting habitats within the Project's limits of disturbance and a 100-foot buffer, as access is allowed. If nesting birds are found at any time, an appropriate buffer will be established around the nest by

Q2

the qualified biologist until it has been determined that young have fledged, or nesting activities have ceased.

BIO-9 – As a former Fish and Wildlife Biologist with the USFWS, I consulted with project proponents on their potential impacts to migratory birds. I'm also familiar with the project site. While the proposed project contains some measures that will help to avoid potential impacts to migratory birds, they may be insufficient to ensure that impacts will not occur. Limiting surveys for migratory birds to the project's limits and a 100-foot buffer may not avoid disturbance to nesting birds resulting from construction noise. Songbirds in adjacent vegetation, including rare and declining species such as thrashers, may be present and potentially affected. Numerous studies have shown that Anthropogenic noise may negatively impact many species of birds, particularly those which rely on acoustic communication. A determination needs to be made if project construction noise levels will disturb nesting birds. If so, measures need to be incorporated to reduce sound levels. The Palm Springs office of the USFWS can provide consultation and recommendations to help avoid and minimize noise impacts.

Q2 Cont

<u>Ecological Importance of the Area</u>

The proposed project is located in an area of great importance to the maintenance of biological diversity in the region and beyond.

- The proposed project is within the central branch of the San Bernardino-San Jacinto Linkage, one of 15 South Coast Missing Linkages considered vital to ensuring regional connectivity from Baja California Norte, Mexico to the southern Sierra Nevada (SC Wildlands, 2008).
- I-10 in this location has been identified as a 2022 Priority Wildlife Barrier for remediation by the California Department of Fish and Wildlife (CDFW).
- Caltrans District 8 Adaptation Priorities Report and associated data identifies the stretch of Interstate 10 adjacent to the Proposed Project site as vulnerable to climate change and has identified and prioritized roadways, bridges, and culverts to ensure resilience of the State Highway System.
- The area of Interstate-10 directly adjacent to the Proposed Project is identified as a Caltrans' Adaptation Priority 1 Roadway.
- The project area is within the Coachella Valley MSHCP Biological Cores and Linkages and its Sand Source/Transport Linkages. It provides important role in ecosystem processes including sand transport that is critical for sustaining the habitat of desert species such as the federally endangered Coachella Valley fringed toed lizard and other species in the Coachella Valley.

Q3

Impediments and Barriers to Wildlife Movement

The proposed project will impede, if not be a complete barrier, to wildlife movement for several reasons:

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- The proposed project has the potential to amplify the barrier effects of I-10 given that it will significantly constrict naturally braided streams which had much greater permeability for wildlife before their constriction – wildlife have fewer pathways they can use than historically. This is especially true given the proximity of the project to an important riparian corridor in Stubbe Canyon. The vegetation in the riparian corridor facilitates wildlife movement in the linkage, but the value of this attribute is diminished due to the constriction of the stream at the bridge. The braided streams and their constriction at both bridges can be seen in Figure 2 of the MND. It is also illustrated by the 100-year floodplain in Exhibit D of the Hydrological Study.

- The limited openness ratio of the proposed bridges would inhibit or prevent wildlife from moving under Railroad Avenue. This is particularly true for the bridge over Fornat Wash. Project photos show debris flows nearing the top of the bridge, leaving very little space for wildlife to cross under it. The MND Project Setting states that the elevation of the Fornat Wash Bridge may increase, "but by no more than two feet." Even with a two-foot increase, the openness ratio of the crossing would be insufficient for many species of wildlife.

- Part of the stated reason for bridge replacement is damage from flood scour. The lack of cover and rough terrain created by flood scour can impede or preclude the movement of wildlife. Rough terrain in the stream bottom could create a complete barrier to the movement of desert tortoise (*Gopherus agassizii*). Bridged undercrossings should extend to uplands beyond the scour zone of the stream and should be high enough to allow enough light for vegetation to grow underneath (Beier et al., 2008). This would have the added benefit of reducing potential damage to the bridge in 100-year or greater flood events which are predicted to become more frequent due to climate change.

Q4

Mandatory Findings of Significance

The initial study concludes that there are no Mandatory Findings of Significance. Under CEQA Section 15605 Mandatory Findings of Significance, Subsection(a)(1), a lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur: The project has 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; or substantially reduce the number or restrict the range of an endangered, rare or threatened species.

The San Bernardino-San Jacinto linkage connects the San Gabriel/San Bernardino and Eastern Peninsular Range subpopulations of mountain lion. These subpopulations along with four others in Central and Southern California, comprise and Evolutionary Significant Unit (ESU). The ESU has been

Q5

designated as a candidate for listing as by the California Fish and Game Commission. As a candidate for listing, it is afforded full protection under the California Endangered Species Act. Determinations of significance and the adequacy of mitigation measures must be made in that context.

Q5 Cont

The Eastern Peninsular Range mountain lion subpopulation is extremely vulnerable to possible extirpation unless it remains connected to other subpopulations in the ESU, because its numbers are so low. Their total number is estimated to be between 63 and 126 animals and their effective population size is estimated to be 32 (Center for Biological Diversity and Mountain Lion Foundation Listing Petition, 2019). As a general rule, a population needs 50 individuals to prevent inbreeding depression, and 500 individuals to guard against genetic drift. The San Bernardino-San Jacinto Linkage is crucial to the survival of the Eastern Peninsular Range subpopulation, because it a connects them to other subpopulations in the ESU, making their effective population size larger. A larger effective population size increases genetic diversity, helping to lower the risk of inbreeding depression, genetic drift, and founder effect, and providing a population with an increased ability to adapt to changes in their environment over time. Even small impediments to movement of mountain lions through the San Bernadino-San Jacinto Linkage could reduce the effective size of the subpopulations on both sides of the linkage, placing them and the ESU as a whole at much greater risk of extinction. In summary, the impediment to the movement of mountain lions resulting from the construction of bridges which are of inadequate size and configuration to support robust connectivity, combined with the precarious state of the Eastern Peninsular Range mountain lion subpopulation and other subpopulations in the ESU has significant potential to cause them to drop below self-sustaining levels, to restrict their range, and to ultimately eliminate them.

Q6

Given the information presented above, additional analysis of project's effects and their significance needs to be completed, and unless the project is modified to reduce impacts to rare, threatened, and endangered species, including the ESU of mountain lions, desert tortoise, and potentially other rare species that depend on the linkage, a Mandatory Finding of Significance is warranted. Project modifications should include bridge redesign at both locations to increase the openness ratio, and to extend them beyond the flood scour zone. There also needs to be more extensive planting of vegetation, including outplanting, at the approaches to and under the bridge, and planting needs to include the creation of roughness, a weed management plan, performance measures, and remediation measures if performance measures are not met.

Q7

Q8

Given that the proposed project would have direct and indirect effects to Central and Southern California ESU of mountain lions which is a candidate for state listing, and potential effects to desert tortoise, if consultation with the Wildlife Agencies has not occurred, it should be initiated. Any mitigation measures resulting from the consultation should to be incorporated in the proposed project.

Q9

Improvements to structures on I-10, Railroad Avenue, and the rail line are needed to maintain connectivity though the San Bernardino-San Jacinto Linkage which is a vital link in a series of key linkages between Canada and Mexico. Its importance is recognized by Caltrans, CDFW, USFWS, non-profit conservation organizations, and academics. It has been included in statewide planning for connectivity by CDFW. It has also been prioritized by the Coachella Valley Conservation Commission in its implementation of the Coachella Valley Multiple Species Habitat Conservation Plan – a number of

Q10

parcels have been acquired to preserve the linkage. I hope this context alone will convince the County to revisit and modify its current project proposal and collaborate with the Wildlife Agencies and other entities to design and build bridges at the Fornat Wash and the East Channel Stubbe Wash crossings of Railroad Avenue which will maintain and enhance connectivity through the San Bernardino-San Jacinto habitat linkage. Beyond that, the County has an obligation to adequately address the project impacts to listed and rare species under CEQA, the California Endangered Species Act, and the Federal Endangered Species Act.

Q10 Cont.

As CEQA states: "An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting." It is clear that the setting of this project, located in a major wildlife corridor, and within a Multiple Species Habitat Conservation Plan Conservation Area, is immensely important and significant.

Thank you for the opportunity to comment on this very important people and wildlife transportation project. Please don't hesitate to contact me if you have any questions or would like additional information.

Q11

Sincerely,

Geary Hund
Wildlife Biologist

Literature Cited

Abella, S. R., Craig, D. J., & Suazo, A. A. (2012). Outplanting but not seeding establishes native desert perennials. *Native Plants Journal*, *13*(2), 81–90. https://doi.org/10.3368/npj.13.2.81

Beier, P., Majka, D., Newell, S., & Garding, E. (2008). Best management practices for wildlife corridors. *Northern Arizona University*, *1*(3), 1-14.

Center for Biological Diversity, Mountain Lion Foundation. A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)

DeFalco, L. A., Esque, T. C., Nicklas, M., & Kane, J. M. (2010). Supplementing seed banks to rehabilitate disturbed Mojave Desert shrublands: Where do all the seeds go? *Restoration Ecology*, *20*(1), 85–94. https://doi.org/10.1111/j.1526-100x.2010.00739.x

South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion
http://www.scwildlands.org/reports/scmlregionalreport.pdf

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment Q1:

Commenter cited references where it was found that seed imprinters and tackifiers promote seed germination and growth. Commenter notes that even with seedling emergence, establishment is low due to inadequate rainfall, herbivory, and competition with non-native plants. Commenter provides a variety of suggestions for successful re-vegetation efforts, including using seed imprinters and tackifiers, combining seeding with outplantings, providing irrigation until plants are established, implementing a weed control plan, and including performance standards and remediation measures. Commenter states that without additional measures to ensure successful re-vegetation, measure BIO-1 is insufficient to mitigate for project impacts to vegetation and wildlife.

Response:

Total temporary disturbed area for all vegetation communities and land cover types is 0.78 acres for Fornat Wash Bridge and 0.80 acres for East Channel Stubbe Wash Bridge. These impacts are minor and within a small impact area and do not necessitate excessive replanting. In addition, much of the temporary work area impacts are below the bridge in the shade. The Project area is characterized by shallow alluvial channels that are often dry shallow beds with sparse vegetation. All temporary disturbance areas would be hydroseeded with native plant mix, which meets County and Caltrans standards.

Comment Q2:

Commenter states that limiting surveys for migratory birds to the Project limits, plus a 100-foot buffer may not avoid disturbance to nesting birds resulting from construction noise. Commenter suggests that a determination needs to be made if project construction noise levels will disturb nesting birds. If so, measures need to be incorporated to reduce sound levels. Commenter notes that the USFWS Palm Springs office can provide consultation and recommendations.

Response:

Measure **BIO-9** has been modified based on recommendations received from CDFW in their public comment letter to the IS/MND dated August 3, 2023 (see Comment B11). **BIO-9** now states that if nesting birds are found at any time, a buffer of at least 300 feet for passerines and 500 feet for raptors, will be established on ground. The measure also notes that the buffer may be smaller or larger depending on the determination of the qualified biologist. Additionally, **BIO-9** has been modified to state that active nests will be monitored daily by a qualified biologist for behavioral modifications induced by construction noise or other activity and will have stop-work authority if nests are impacted.

Comment Q3:

Commenter notes that the Project is within the San Bernardino – San Jacinto Linkage, which is vital to ensuring regional connectivity. Commenter states the Project is in a CVMHSCP biological core and linkage area, CVMHSCP sand transport area, and is in an area identified as a 2022 Priority Wildlife Barrier for remediation by CDFW. Commenter also notes that Caltrans

District 8 has identified the area directly adjacent to the Project as Priority 1 in the Adaptation Priorities Report and is vulnerable to climate change.

Response:

The County, as a permittee of the CVMSHCP, is required to comply with the conservation directives outlined in the plan. The Project has been determined to be consistent with the CVMSHCP. Projects that are consistent with the CVMSHCP are allowed "take" of special-status species, including threatened and endangered species that are Covered under the CVMSHCP. The Project would have temporal impacts on wildlife connectivity (loss of connectivity for 6 months at each crossing). An analysis of temporary impacts to wildlife crossings is provided in response to Impact (d) under subheading, *Impact Analysis*, of the Final is IS/MND. An analysis of impacts to threatened and endangered species is provided in Section 3.4, Biological Resources, in response to Impact (a). Section 3.4, *Biological Resources*, under subheading, *Wildlife Corridors,* of the Final is IS/MND has been modified to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. As identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions (connectivity would be returned) and would be hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. Section 3.4, *Biological Resources*, also acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area.

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's *Restoring California's Wildlife Connectivity 2022*, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. Additionally, the openness ratio of the undercrossings would be improved, with the elevation of the Fornat Wash bridge being increased by approximately two feet and the piers within each channel bed being eliminated, due to the improved strength and single-span design of the replacement concrete bridges.

Comment Q4:

Commenter states that the Project will impede or possibly be a complete barrier to wildlife movement because it amplifies the barrier effects of I-10, limits the openness ratio of the undercrossings, and creates rough terrain in the streambed bottom due to flood scour.

Response:

While wildlife connectivity is an ongoing issue and is important for the persistence of many species in the region, the Project design and minimization measures identified throughout this document would continue to support a successful wildlife habitat corridor for a range of species. As previously described, the Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge

beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

Measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. Following construction, the crossings would be restored to baseline conditions or better and will continue to provide vegetation cover to support wildlife movement. In addition, the channel bottom would remain earthen and sandy for continued movement of species. All Project impacts to biological corridors would be temporary. After Project implementation, it is expected that the Washes will continue to provide connectivity for a diversity of wildlife.

Comment Q5:

Commenter states that the California Endangered Species Act status for mountain lion has changed and is now designated as a candidate species for listing. Commenter states that determinations of significance and adequate mitigation measures must be made in that context.

Response:

The Final IS/MND has been revised to include the mountain lion status. The discussions regarding special-status mammals and wildlife corridors in the Environmental Setting and Impact Analysis under *Special-Status Mammals* in Section 3.4 of the Final IS/MND have been expanded to clarify why the proposed Project would not permanently impede or impact wildlife, such as mountain lion, from using the corridor. Measure **BIO-2** would address potential indirect effects on sensitive mammals that may occur within the vicinity of the Project area. Furthermore, as identified in measure **BIO-1**, all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition to hydroseeding, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion. Therefore, proposed Project would not have a significant impact on mountain lion.

Comment Q6:

Commenter notes the population size and genetic factors of mountain lion in the region. Commenter states that the impediment to the movement of mountain lions resulting from the construction of the bridges, which are of inadequate size and configuration to support robust connectivity, has significant potential to cause the species to drop below self-sustaining levels.

Response:

Wildlife connectivity for mountain lion could be temporarily impeded during construction. However, adjacent passages will remain open during construction. Also, the Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet freeboard requirements. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project.

The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

Furthermore, providing a wide range of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10 that supports wildlife movement of a diversity of wildlife species, in addition to reducing human disturbance has been determined to be the most important for supporting biological diversity (Murphy-Mariscal et al., 2015).

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy to support continued movement for wildlife. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife, including mountain lion.

Comment Q7:

Commenter states that unless the Project is modified to reduce impacts to rare, threatened, and endangered species, including mountain lions, desert tortoise, and other rare species that depend on the linkage, a Mandatory Finding of Significance is warranted.

Response:

As previously described, the proposed Project would have a less than significant impact on rare, threatened, and endangered species; including mountain lions. Therefore, no Mandatory Finding of Significance is warranted.

Comment Q8:

Commenter suggests that Project modifications should include bridge redesign at both locations to increase openness ratio. Commenter also suggests that that there needs to be more extensive planting of vegetation, a weed management plan, performance measures, and remediation measures.

Response:

As previously described, designing the bridges in a manner that focuses on increasing the openness ratio for wildlife passage is not part of the Project's intent, which is to address the current bridge deficiencies while minimizing the project footprint to reduce overall impacts. Both bridges would be replaced in-kind so the openness ratio would not decrease. The current Project design proposes that the elevation of Fornat Wash bridge be increased by approximately two feet, which would increase the openness of the undercrossing. Increasing the openness ratio of the bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

Additionally, there would be minimal vegetation disturbance as there is minimal vegetation present. It is expected that the project design and minimization measures would continue to support a successful wildlife habitat corridor for a range of species.

Comment Q9:

Commenter states the proposed Project would have direct and indirect effects to mountain lions and potential effects to desert tortoise and should undergo agency consultation to address those effects.

Response:

The proposed Project would not have direct or indirect impacts on mountain lion. A "No Effect" determination was made for the Project; therefore, consultation with the USFWS was not required. Consultation with the CVCC was conducted in April and September 2019 and again between February and May 2024. During the May 2024 consultation, the CVCC noted that the Project is considered an in-kind replacement as the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024 the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities (see Appendix D).

During construction, it is not expected that mountain lions would enter a construction site while construction is occurring. At night, provided no night work is ongoing, mountain lions could move through the area unimpeded. In addition, during active construction, mountain lions that might normally use the undercrossing at Fornat Wash could use an undercrossing approximately 500 feet to the west. In addition, West Channel Stubbe Wash is approximately 270 feet west of the East Channel Stubbe Wash, which could temporarily accommodate passage.

Desert tortoise is a covered species under the CVMSHCP. Since the Project is a Covered Activity under the CVMSHCP, "take" of special-status species, including threatened and endangered species, are factored into the CVMHSCP and are mitigated for. However, the Project would still conduct presence/absence desert tortoise surveys before construction (**BIO-5**) and implement a worker education program (**BIO-6**) to ensure construction activities avoid impacts on migrating individuals. Additionally, the presence of a biological monitor (**BIO-3**) would ensure no impacts would occur. Implementing these measures would ensure the Project is consistent with the CVMHSCP. Additionally, **BIO-5** has been modified based on recommendations received from CDFW in their public comment letter to the IS/MND dated August 3, 2023 (see Comment B12). Revised text for **BIO-5** has been included in the Final IS/MND and is sufficient to reduce impacts on desert tortoise.

Comment Q10:

Commenter summarizes the need for improvements to structures on I-10, Railroad Avenue, and the rail line to maintain wildlife connectivity. Commenter hopes the County will revisit and modify its current project proposal and collaborate with agencies and entities. Commenter states, that the County has an obligation to adequately address the Project impacts on rare and listed species.

Response:

As described in the responses to Comment Q9, the Project would be increasing the openness ratio of Fornat Wash along Railroad Avenue. Since the Project proposes largely in-kind

replacement of the bridges, there would be no permanent change to wildlife movement following the Project.

Furthermore, as a Covered Activity under the CVMSHCP, "take" of special-status species, including threatened and endangered species, are factored into the CVMHSCP and are mitigated for. In addition, the County has consulted with the CVCC on multiple occasions as required for projects proposing activities that may have an impact on habitat connectivity. During consultation conducted in May 2024, the CVCC noted that the Project is considered an in-kind replacement as the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024 the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities (see Appendix D).

Additionally, providing a wide range of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10 that supports wildlife movement of a diversity of wildlife species, in addition to reducing human disturbance has been determined to be the most important for supporting biological diversity (Murphy-Mariscal et al., 2015). The Project would not increase capacity, nor is it anticipated that the Project would result in an increase in human disturbance within the area. Impacts to rare, candidate, and listed species are analyzed in the Final IS/MND and can be found in Section 3.4, *Biological Resources*, under subheading *Impact Analysis*.

The undercrossings would be at baseline conditions or with improved clearance. After Project implementation, it is expected that the washes would continue to provide connectivity for a diversity of wildlife.

Comment Q11:

Commenter emphasizes the significance of the project's setting and provides their contact information for further coordination.

Response:

Comment noted.

Comment R – Michelle Murphy-Mariscal (July 27, 2023)

27 July 2023

County of Riverside Transportation Department
Attn: Frances Segovia, Senior Transportation Planner
3525 14th Street, Riverside, CA 92501
fsegovia@rivco.org

RE: Initial Study/Mitigated Negative Declaration for the Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and over East Channel Stubbe Wash (Br. No. 56C0101)

Dear Frances Segovia,

I am writing to respectfully request that an Environmental Impact Report be prepared to investigate potential impacts to biological resources that may result from the Railroad Avenue Bridge Replacement Project over Fornat Wash (Br. No. 56C0099) and over East Channel Stubbe Wash (Br. No. 56C0101) (hereafter "Project"). R1

I am an ecologist and have worked in the region since obtaining my Masters of Science degree in Evolution, Ecology and Organismal Biology from the University of California Riverside. My Master's thesis research involved assessing wildlife use of several underpass structures beneath Interstate-10 and State Route-62 in the Coachella Valley during 2010-2012, including the eastern Stubbe structure that will be involved in the proposed project (Murphy-Mariscal et al. 2015[1]). While there are several areas in the Initial Study/Mitigated Negative Declaration (IS/MND) that warrant additional evaluation, the focus of my comments will be Biological Resources, specifically potential impacts to wildlife movement resulting from the proposed project. R2 The Project is situated within the San Bernardino-San Jacinto Mountain wildlife corridor linkage, a vital connection between the Peninsular and Transverse Mountain ranges. Interstate-10 acts as a complete barrier to wildlife movement traversing this linkage and this barrier effect is only mitigated via the availability of the underpasses beneath the highway. I disagree with the assessment outlined in the IS/MND that the Project would not interfere substantially with the movement of any native resident or migratory wildlife species or with established wildlife corridors, and adequate justification for that determination was not provided in the IS/MND. The project will take approximately 12 months to complete (6 months per bridge) which is a significant amount of time for the structures to be unavailable for wildlife use in the context of gene flow, resource R3

[1] Murphy-Mariscal, Michelle L., Cameron W. Barrows, and Michael F. Allen. "Native wildlife use of highway underpasses in a desert environment." *The Southwestern Naturalist* 60.4 (2015): 340-348.

provisioning, dispersal, and other ecological considerations. It can also be assumed that wildlife will continue to avoid the structures for a period of time following project completion while they habituate to the new structures and loss of vegetative cover. In the case of East Channel Stubbe Wash, the IS/MND states that the adjacent West Channel Stubbe Wash structure could accommodate wildlife use during construction activities, however, Pacific Crest Trail recreation use will also be temporarily re-routed to the West Channel Stubbe Wash. While construction activities will be largely limited to daylight hours, recreational use of the trail occurs at all hours of the day and night (as observed via wildlife camera monitoring) and therefore wildlife crossing opportunities at that adjacent structure will be greatly constrained from both of these disturbances. The avoidance and minimization measures outlined in BIO-2 do not address this conflict. Please assess these potential impacts and identify appropriate minimization or mitigation measures. Please also provide information (e.g., dimensions) for the crossing structures that are adjacent to the project sites to justify the conclusion that they are suitable alternative crossing locations for wildlife movement during construction activities for those unfamiliar with the project areas.

R3 Cont.

R4

This project provides a rare opportunity to also make improvements to the Fornat and East Channel Stubbe Wash structures that would facilitate higher rates of use by wildlife. Such improvements, including maximizing openness ratio and design features for excluding off-highway vehicle use, could serve as mitigation for potential impacts to wildlife use of the movement corridor due to construction activities. Please consider incorporating these improvements as a component of the Project goals.

R5

Thank you for your consideration of these comments.

Respectfully,

Michelle Murphy-Mariscal

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment R1:

Commenter requests the preparation of an Environmental Impact Report (EIR).

Response:

In accordance with CEQA Guidelines 15070, a public agency shall prepare a proposed negative declaration or mitigated negative declaration when the initial study shows that there is no substantial evidence that the project may have a significant effect on the environment, and/or the initial study identifies potentially significant effects, but the effects can be mitigated to a point where clearly no significant effects would occur. Section 3, *Environmental Factors Potentially Affected* of the IS/MND evaluated all subject topics for potential impacts resulting from Project implementation. The evaluation determined that all topic areas would result in less than significant impacts. In addition to standard measures, such as Best Management Practices and compliance with applicable regulatory guidance, avoidance, minimization, and/or mitigation measures have been identified and would be implemented as part of the Project to further reduce potential impacts.

Therefore, preparation of an EIR was determined not to be warranted based on the less than significant findings of the Final IS/MND.

Comment R2:

Commenter summarizes her professional experience as an ecologist and academic research assessing wildlife use of several underpass structures beneath I-10 and SR-62. Commenter notes their comments will be focused on Biological Resources.

Response:

Comment noted.

Comment R3:

Commenter disagrees with the determination made in the IS/MND that the Project would not substantially interfere with the movement of any native resident or migratory wildlife species or with an established wildlife corridor. Commenter states that the Project will take 12 months to complete (6 months per bridge) and noted that this is a significant amount of time for the structures to be unavailable for wildlife use and that the avoidance and minimization measures in BIO-2 do not address the conflict with Pacific Crest Trail recreation at adjacent West Channel Stubbe Wash; which will also be re-rerouted there.

Response:

During construction, there would be an increase in human presence and use of construction equipment, which is expected to deter animals from entering the area. However, in the absence of active construction activities, particularly during the evening (provided no night work is needed) and early morning hours, wildlife are expected to continue using the washes for movement. Wildlife that might normally use the undercrossings at Fornat Wash and East Channel Stubbe

wash could potentially use undercrossings approximately 500 feet and 270 feet west of each wash respectively. In addition, implementation of avoidance and minimization measures, such as clearance and pre-construction surveys, biological monitoring, worker environmental awareness training, and Best Management Practices (fire suppression, dust control, trash storage and removal, etc.), would avoid or reduce the likelihood of impacts on wildlife during construction activities. Biological corridors would be fully accessible for animal movement post construction.

During construction the East Channel Stubbe Wash would be open for trail use; however, trail users would be encouraged to use the West Channel Stubbe Wash to avoid the potential disruption of active construction. There would only be two, 10-day closures of the underpass - during bridge demolition and new girder erection. During those two closures, trail users, except for equestrians, could use the West Channel Stubbe Wash. Trail users would be notified in advance of the pending closures. Use of either wash during construction by wildlife would likely continue depending on the amount of disturbance and human presence.

Comment R4:

Commenter requests the dimensions of the alternative undercrossing structures that are adjacent to the Project.

Response:

The dimensions for the I-10 west bound bridge over Cottonwood Creek (bridge number 56C0317) are as follows:

- 3 spans, horizontal clearance 3.81 feet, length of maximum span – 1.41 feet, structure length 4.46 feet, bridge width 7.61 feet, deck width – 9.84 feet, minimum vertical clearance over bridge roadway – 3.28 feet.

The dimensions for the I-10 east bound bridge over Cottonwood Creek (56C0317) are as follows:

- 3 spans, horizontal clearance 3.81 feet, length of maximum span – 1.41 feet, structure length 4.46 feet, minimum vertical clearance over bridge roadway – 3.28 feet.

Comment R5:

Commenter suggests considering improvements to Fornat and East Channel Stubbe wash structures, such as maximizing the openness ratio and excluding off-highway vehicle use, to mitigate potential impacts to and facilitate higher rates of use by wildlife during construction.

Response:

As previously described, the Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet in vertical height, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the

channel bed, which would also increase the openness ratio of both bridge undercrossings. Furthermore, providing a wide range of underpass structures, such as Fornat Wash bridge underpass, East Channel Stubbe Wash bridge underpass, and other underpasses that currently exist along I-10 that supports wildlife movement of a diversity of wildlife species, in addition to reducing human disturbance has been determined to be the most important for supporting biological diversity (Murphy-Mariscal et al., 2015). The Project would not increase capacity, nor is it anticipated that the Project would result in an increase in human disturbance within the area.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife. Per CEQA, mitigation measures can only address impacts associated with the proposed Project and not preexisting environmental conditions (CEQA Guidelines, § 15041 and Ca. Pub. Res. Code § 21159.2 (b)).

Comment S – Verbal Comment: Kristeen Penrod (July 12, 2023)

Railroad Avenue Public Meeting

July 12, 2023

Verbal Public Comment

Thanks for having this meeting and giving us the opportunity to provide input to the process. My name is Kristeen Penrod, I am the Director of SC Wildlands, and also work with Center for Large Landscape Conservation. Both of these proposed bridges overlap the Coachella Valley Multiple Species Conservation Plan - Biological Corridors and Linkages and sand source and sand transport areas; as well as, as you mentioned in your presentation, the Cabazon Conservation Area for the Coachella Valley Multiple Species Conservation Plan. This area is also included in the San Bernardino/San Jacinto Linkage that was completed just after the Coachella Valley Multiple Species Conservation Plan was completed. These areas are critical for wildlife movement. S1

I think this project is an opportunity, especially because the bridges for Fornat Wash and E. Stubbe Canyon as well as the I-10 itself, are all identified as adaptation priorities for Caltrans. The railroad avenue bridges should not be the same dimensions. They should be upgraded to accommodate future influxes for adaptation and climate resilience to ensure both the I-10 and the adjacent areas that funnel flood waters from Fornat and Stubbe Canyon can accommodate future climate issues, as well as accommodate wildlife movement. S2

I think this is a huge opportunity for improving wildlife movement as far as mitigation measures to include opportunities for improving wildlife movement with regards to habitat cover that may have been diminished from the historic and long-term de-watering of the streams upstream from here both for wildlife movement, as well as the Morongo Tribe's Cultural Natural Heritage and the importance of that. S3

So again, I think this is an opportunity, and we should take it and grab it and ensure wildlife movement is improved through these improvements and I think the structures need to be upgraded for sizing to provide more openness ratio and provide improvements to the approaches for habitat cover from both directions. This is a real opportunity, so thank you. S4

Thank you for your comments. Comments have been included in the Final Environmental Document.

Comment S1:

Commenter thanks the project team for holding a public meeting and provided a self-introduction. Commenter notes that the two bridges overlap the CVMSCP Biological Corridors and Linkages and sand source and sand transport areas, as well as the Cabazon Conservation Area for the CVMSCP and the San Bernardino – San Jacinto Linkage. Commenter states that these areas are critical for wildlife movement.

Response:

Comment noted. Section 3.4, *Biological Resources*, under subheading, *Wildlife Corridors*, of the Final IS/MND has been revised to include an updated discussion on wildlife corridors and identify the importance of the East Channel Stubbe Wash and Fornat Wash as linkages between terrestrial habitats. Furthermore, this section acknowledges that the East Channel Stubbe wash is an important fluvial sand transport area.

Comment S2:

Commenter notes that the Project is an opportunity to accommodate future climate issues and wildlife movement especially because the bridges, as well as the I-10 itself, are all identified as adaptation priorities for Caltrans. Commenter recommends that the bridge dimensions should be upgraded to accommodate future climate changes and wildlife movement adaptation.

Response:

A scour Plan of Action was performed on the bridges by the County in 2013, which recommended total replacement of the bridges due to the extent of the scour, structural instability, and deterioration of various bridge elements. Replacing the timber bridges with modern concrete bridges would improve their structural integrity and resiliency.

As the comment indicates, the Project is located within the 15.1-mile long I-10 Banning Pass wildlife barrier. This area was identified as a priority wildlife barrier in need of remediation in CDFW's Restoring California's Wildlife Connectivity 2022, which assessed barriers to wildlife movement throughout the state. Species impacted include mule deer, mountain lion, black bear, and bighorn sheep. All Project impacts to wildlife connectivity would be temporary, as each bridge would be replaced within its existing footprint and existing undercrossings would be retained. The replacement bridges would be single-span structures requiring no columns within the channel bed, which would increase the openness ratio of both bridge undercrossings. The Project proposes to increase the vertical height of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project and does not meet the intent of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. After Project implementation, it is expected that the washes will continue to provide connectivity for a diversity of wildlife.

Comment S3:

Commenter notes that Project mitigation measures offer an opportunity to improve wildlife movement by addressing diminished habitat cover as a result of historic and long-term upstream de-watering, which would benefit both wildlife movement and the Morongo Tribe's Cultural Natural Heritage.

Response:

The Project would avoid and minimize all Project related impacts on wildlife movement through implementation of standard measures, best management practices, and/or avoidance and minimization measures. Temporary impacts to existing vegetative cover are minor, approximately 0.78 acres for Fornat Wash bridge and 0.80 acres for East Channel Stubbe Wash bridge. All temporary disturbance areas would be hydroseeded with native plant mix meeting County and Caltrans standards.

As a Covered Activity under the CVMSHCP, "take" of special-status species, including threatened and endangered species, are factored into the CVMHSCP and are mitigated for. In addition, the County has consulted with the CVCC on multiple occasions as required for projects proposing activities that may have an impact on habitat connectivity. During consultation conducted in May 2024, the CVCC noted that the Project is considered a replacement in-kind as the new bridges would have similar dimensions as the old bridges. In a letter dated May 22, 2024, the CVCC stated that they did not anticipate the corridors would be adversely impacted by the proposed activities (see Appendix D). A "No Effect" determination was made for the Project; therefore, consultation with the USFWS is not required.

The eastern portion of the biological study area for Fornat Wash Bridge occurs within tribal lands for the Morongo Band of Mission Indians. Project activities within these tribal lands are not covered under the CVMSHCP. However, all work proposed within tribal lands will be limited to light grading and staging within the existing paved roadway. Furthermore, no habitat for sensitive species or sensitive biological resources occurs within this area.

Based on coordination with the Morongo Band of Mission Indians, no additional coordination for biological resources is necessary and no additional mitigation measures are required to address potential wildlife movement impacts or impacts to Tribal Cultural Resources. Tribal Consultation under AB 52 is documented in the Final IS/MND (see Appendix B). CEQA Guidelines do not require a project to remediate damage not caused by the Project or preexisting environmental conditions (CEQA Guidelines, § 15041 & Ca. Pub. Res. Code § 21159.2 (b)).

Comment S4:

Commenter emphasizes that the Project provides an opportunity to ensure wildlife movement is improved by increasing the openness ratio of the bridge undercrossings and improving the habitat cover at the bridge approaches from both directions.

Response:

As previously described, the Project proposes to increase the elevation of Fornat Wash bridge by approximately two feet to meet free-board requirements, which would increase the openness of the undercrossing. The East Channel Stubbe Wash bridge elevation would remain the same. The free-board requirement is to ensure sufficient freeboard (space) between the bridge deck and storm discharge design depth to avoid overflow which can cause substantial damage, as well as

maintenance problems. Increasing the openness ratio of Fornat Wash bridge beyond the proposed two feet would substantially increase the cost and footprint of the Project and does not meet the intent of the Project. The East Channel Stubbe Wash bridge elevation would remain the same at 13.5 feet of vertical clearance, which can accommodate equestrians. Additionally, because of the stronger concrete materials, the replacement bridges would be single-span structures requiring no piers within the channel bed, which would also increase the openness ratio of both bridge undercrossings.

As previously described, measure **BIO-1** would ensure that all temporary construction areas would be returned to preconstruction conditions and hydroseeded with a native plant seed mix. In addition, the channel bottom would remain earthen and sandy for continued movement of species. After Project implementation, it is expected that the Washes would continue to provide connectivity for a diversity of wildlife.

Appendix D - May 2024 Coordination Letter from CVCC

COACHELLA VALLEY CONSERVATION COMMISSION

CVCC

Cathedral City • Coachella • Desert Hot Springs • Indian Wells • Indio • La Quinta • Palm Desert • Palm Springs
Rancho Mirage • County of Riverside • Coachella Valley Water District • Imperial Irrigation District
Mission Springs Water District

May 22, 2024

Frances Segovia
Senior Transportation Planner
Riverside County Transportation Department
3525 14th Street
Riverside, CA 92501

RE: Railroad Avenue Bridge Replacement Coordination

Dear Frances Segovia:

The Riverside County Transportation Department (RCTD) has alerted the Coachella Valley Conservation Commission (CVCC) of its plans to repair and replace bridge facilities along Railroad Avenue where it crosses Fornat Wash (56C0099) and the east channel of Stubbe Wash (56C0101). These facilities are located within the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP)-designated Cabazon Conservation Area and Snow Creek/Windy Point Conservation Area, respectively. In both Conservation Areas, Railroad Avenue is identified as a facility subject to Covered Activities, inclusive of bridge operation and maintenance, as described in section 7.3.1.1 of the CVMSHCP. Although operations and maintenance activities are not required to undergo the Joint Project Review process, activities that may have an impact on habitat connectivity are subject to consultation with CVCC to ensure the continued viability of any undercrossings.

RCTD has provided 30% design plans of the proposed bridge structures, dated February 16, 2024, to CVCC for review. These plans indicate that the existing wooden support structure, which includes interior piers, will be removed, to be replaced with stronger materials that will not require any piers to support the bridge platform. Rock slope protection (RSP), in the form of ungrouted riprap, will be placed along the downstream embankments, and extend into the channel only insofar as to prevent scour, but will not otherwise line the channel bottom. The toe of the RSP on either side of the channel is expected to be approximately eight feet below the channel bottom and covered with sediment, resulting in a bottom mimicking natural conditions.

Precise elevations have not been identified on the plan set provided for review. At the Fornat Wash crossing, the minimum channel invert elevation at the downstream face of the bridge is expected to be 1,546 feet and the minimum bridge bottom elevation at the downstream face is expected to be approximately 1,553 feet, to correspond to the modeled water surface elevation during a 100-year flood event. This would result in a corridor height of approximately seven feet. Analogous measurements for the East Channel Stubbe Wash bridge are 1,333 feet and 1,348 feet, respectively, which would result in a corridor height of approximately fifteen feet. In both cases, the removal of the wooden support structures will result in the expansion of the opening beneath the bridges.

74-199 El Paseo Avenue, Suite 100 • Palm Desert, CA 92260 • (760) 346-1127 • FAX (760) 340-5949

COACHELLA VALLEY CONSERVATION COMMISSION

As presently designed, CVCC does not anticipate that these corridors will be adversely impacted by the proposed operations and maintenance activities. However, given the early phase of bridge designs, CVCC requests an additional opportunity to review prior to plan finalization to ensure that the minimum dimensions have been maintained. CVCC would also like to take the opportunity to reiterate the importance of preventing the spread of invasive species during the actual project buildout, as originally noted in our comment letter to the Mitigated Negative Declaration.

CVCC staff are available for continued, informal coordination during the design process. If you have any questions, please do not hesitate to reach out to me by email at psatin@cvag.org or by telephone at 760.346.1127.

Sincerely,

Peter Satin
Conservation Program Manager

EC: Katheleen Brundige, CVCC
Greg Hoisington, ICF

74-199 El Paseo Avenue, Suite 100 • Palm Desert, CA 92260 • (760) 346-1127 • FAX (760) 340-5949

Peter Aldana
Riverside County
Assessor-County Clerk-Recorder
2724 Gateway Drive
Riverside, CA 92507
(951) 486-7000
www.rivcoacr.org

Receipt: 23-176213

Product	Name	Extended
FISH	CLERK FISH AND GAME FILINGS	$0.00
	# Pages	3
	Document #	E-202300682
	Filing Type	8
	State Fee Prev Charged	false
	No Charge Clerk Fee	false
Total		$0.00
Change (Cash)		$0.00

6/28/23 12:46 PM
Gateway Public Service

State of California - Department of Fish and Wildlife

2023 ENVIRONMENTAL DOCUMENT FILING FEE CASH RECEIPT

DFW 753.5a (REV. 01/01/23) Previously DFG 753.5a

RECEIPT NUMBER: 23-176213

STATE CLEARINGHOUSE NUMBER *(If applicable)*

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

LEAD AGENCY	LEAD AGENCY EMAIL	DATE
COUNTY OF RIVERSIDE TRANSPORTATION	FSEGOVIA@RIVCO.ORG	06/28/2023

COUNTY/STATE AGENCY OF FILING	DOCUMENT NUMBER
RIVERSIDE	E-202300682

PROJECT TITLE

RAILROAD AVENUE BRIDGE REPLACEMENT PROJECT

PROJECT APPLICANT NAME	PROJECT APPLICANT EMAIL	PHONE NUMBER
COUNTY OF RIVERSIDE TRANSPORTATION	FSEGOVIA@RIVCO.ORG	(951) 955-1646

PROJECT APPLICANT ADDRESS	CITY	STATE	ZIP CODE
3525 14TH ST,	RIVERSIDE	CA	92501

PROJECT APPLICANT *(Check appropriate box)*

☒ Local Public Agency ☐ School District ☐ Other Special District ☐ State Agency ☐ Private Entity

CHECK APPLICABLE FEES:

☐ Environmental Impact Report (EIR)	$3,839.25	$
☐ Mitigated/Negative Declaration (MND)(ND)	$2,764.00	$
☐ Certified Regulatory Program (CRP) document - payment due directly to CDFW	$1,305.25	$

☐ Exempt from fee

- ☐ Notice of Exemption (attach)
- ☐ CDFW No Effect Determination (attach)

☐ Fee previously paid (attach previously issued cash receipt copy)

☐ Water Right Application or Petition Fee (State Water Resources Control Board only)	$850.00	$
☐ County documentary handling fee		$ $0.00
☐ Other		$

PAYMENT METHOD:

☐ Cash ☐ Credit ☐ Check ☒ Other **TOTAL RECEIVED** $ $0.00

SIGNATURE	AGENCY OF FILING PRINTED NAME AND TITLE
X J Rodriguez	Deputy Irma Rodriguez

ORIGINAL - PROJECT APPLICANT | COPY - CDFW/ASB | COPY - LEAD AGENCY | COPY - COUNTY CLERK | DFW 753.5a (Rev. 01/01/2023)

Lead Agency: COUNTY OF RIVERSIDE TRANSPORTATION DEPARTMENT
ATTN: FRANCES SEGOVIA, SENIOR TRANSPORTATION PLANNER
Address: 3525 14TH STREET
RIVERSIDE, CA 92501

FILED / POSTED
County of Riverside
Peter Aldana
Assessor-County Clerk-Recorder
E-202300682
06/28/2023 12:46 PM Fee: $ 0.00
Page 1 of 3
Removed: By: Deputy

Project Title

RAILROAD AVENUE BRIDGE REPLACEMENT PROJECT

Filing Type

- ☐ Environmental Impact Report
- ☐ Mitigated/Negative Declaration
- ☐ Notice of Exemption
- ☑ Other: NOTICE OF AVAILABILITY

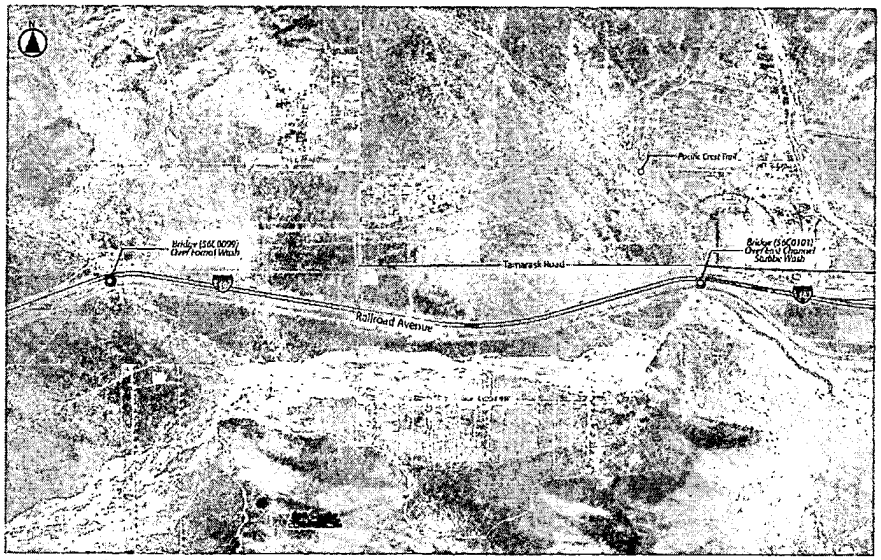
Notes

PUBLIC NOTICE

Notice of Availability of a Draft Initial Study and Intent to Adopt Proposed Mitigated Negative Declaration

Railroad Avenue Bridge Replacement Project

PUBLIC INFORMATION MEETING
Date: July 12, 2023
Time: 6:00 – 7:00 pm
Held virtually via Zoom. * For details, please visit the project website:
https://rcprojects.org/railroadbridges
*The meeting will be held virtually using Zoom and will be accessible via computer or other devices with internet connection. A current version of Zoom is recommended to access the virtual meeting.



WHAT IS BEING PLANNED? The County of Riverside Transportation Department (County) proposes to replace two existing, structurally deficient timber bridges over Fornat Wash and East Channel Stubbe Wash along Railroad Avenue. The new bridges would be in the same location and would replace the existing timber bridges with new modern concrete bridges. The bridges are being replaced so that the roadway can meet current vehicle load and safety standards. Construction is anticipated to take six months per bridge. During construction, a Traffic Management Plan would be prepared to address closures of the road.

WHY THIS PUBLIC NOTICE? The County, as Lead Agency under the California Environmental Quality Act (CEQA), has studied the proposed project and concluded that it would not significantly affect the environment. The report detailing this finding is called an Initial Study. This notice serves to advertise the availability of the Draft Initial Study and your opportunity to read and comment on it, as well as the opportunity to attend the public meeting as advertised in this notice. The Riverside County Board of Supervisors will consider approval of the project and adoption of the Mitigated Negative Declaration (MND) for the project after July 27, 2023.

WHAT'S AVAILABLE? The Draft Initial Study with Proposed MND for the proposed project will be available beginning June 28, 2023. This document will be available for 30 days from June 28, 2023 until July 27, 2023. The document will be available for review at the following locations:

- County of Riverside Transportation Department, 3525 14th Street, Riverside, CA 92501
- Cabazon Public Library, 50425 Carmen Ave, Cabazon, CA 92230 (During normal library hours)
- https://rcprojects.org/railroadbridges

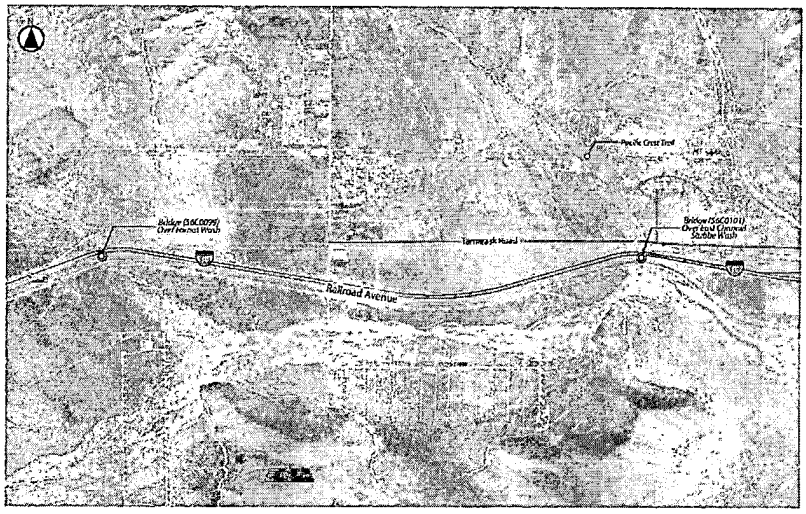
WHERE YOU COME IN Please submit your comments on the Initial Study in writing or by email no later than July 27, 2023, to Frances Segovia, Riverside County Transportation Department, 3525 14th Street, Riverside, CA 92501. Comments will be accepted beginning June 28, 2023. Based on study findings, the County has determined that the proposed project will not have a significant effect on the environment because potential effects would be mitigated to a less than significant level with incorporation of mitigation measures. Potentially significant impacts for which mitigation measures were incorporated include Biological Resources. Pursuant to Section 15072(g)(5) of the CEQA Guidelines, it has been determined that the project footprint is not identified on any of the lists enumerated under Section 65962.5 of the California Government Code pertaining to hazardous waste. Your written comments will be considered in the decision on the project and will be forwarded to the Board of Supervisors before action is taken on the project. Notice of said decision will be mailed to any person requesting notification. No decision will be taken until after the review is complete.

CONTACT For more information about this project or to receive a copy of the Draft Initial Study with Proposed Mitigated Negative Declaration, please contact Frances Segovia, Senior Transportation Planner, Riverside County Transportation Department, at (951) 955-1646 or by email at fsegovia@rivco.org. In compliance with the Americans with Disabilities Act (ADA), persons with disabilities may request reasonable accommodations, including auxiliary aids and services at no cost, to participate in the meeting by contacting the individual noted above at least three (3) business days before the scheduled event. This document is available in alternate formats upon request.

AVISO PÚBLICO

Aviso de Disponibilidad del Estudio Inicial Preliminar y Intento de Adoptar una Propuesta Declaración Negativa Mitigada Proyecto de Reemplazo del Puente Railroad Avenue Bridge

INFORMACIÓN DE LA REUNION PÚBLICA
Fecha: 12 de julio de 2023
Tiempo: 6:00 – 7:00 pm
Realizado virtualmente a través de Zoom. * Para obtener más detalles, visite el sitio web del proyecto: https://rcprojects.org/railroadbridges
*La reunión se llevará a cabo virtualmente usando Zoom y se podrá acceder a través de una computadora o otros dispositivios con conexión a internet. Se recomienda una version actual de Zoom para acceder la reunion virtual.



¿QUÉ SE ESTÁ PLANEANDO? El Departamento de Transportación del Condado de Riverside (Condado) propone reemplazar dos puentes existentes de madera, estructuralmente deficientes sobre Fornat Wash y East Channel Stubbe Wash a lo largo de Railroad Avenue. Los nuevos puentes estarían en el mismo lugar y reemplazarían los existentes puentes de mandera con nuevos puentes de concreto modernos. Los puentes se están reemplazando para que la carretera pueda cumplir con los estándares actuales de carga de vehículos y seguridad. Se anticipa que la construcción tomará seis meses por puente. Durante la construcción, se prepararía un Plan de Gestión del Tráfico para abordar los cierres de la carretera.

¿POR QUÉ ESTE AVISO? El Condado, como la Agencia Líder bajo la Ley de Calidad Ambiental de California (CEQA, por su acrónimo en inglés), estudió el Proyecto propuesto y concluyó que no afectaría significativamente el medio ambiente. El reporte que detalla este hallazgo se llama un Estudio Inicial. Este aviso sirve para anunciar la disponibilidad del Estudio Inicial Preliminar y su oportunidad de leer y hacer comentarios, asi como la oportunidad de asistir a la reunión de información pública como se anuncia en este aviso. La Junta de Supervisores del Condado de Riverside considerará la aprobación del Proyecto y la adopción de la Declaración Negativa Mitigada (MND, por su acrónimo en inglés) para el Proyecto después de el 27 de julio de 2023.

¿QUE ESTA DISPONIBLE? El Estudio Inicial Preliminar con Propuesta MND para el proyecto propuesto estará disponible a partir del 28 de junio de 2023. Este document estará disponible durante 30 días desde el 28 de junio de 2023 hasta el 27 de julio de 2023. El document estará disponible para su revision en los siguientes lugares:

- Departamento de Transportación del Condado de Riverside, 3525 14th Street, Riverside, CA 92501
- Biblioteca Pública Cabazon, 50425 Carmen Ave, Cabazon, CA 92230 (Durante el horario normal de la biblioteca)
- https://rcprojects.org/railroadbridges

DONDE ENTRA USTED Por favor, envíe sus comentarios sobre el Estudio Inicial por escrito o por correo electrónico no más tarde el 27 de julio de 2023 a Frances Segovia, Riverside County Transportation Department, 3525 14th Street, Riverside, CA 92501 o por correo electrónico a fsegovia@rivco.org. Se aceptarán comentarios a partir del 28 de junio de 2023. Basado en los hallazgos del estudio, el Condado ha determinado que el proyecto propuesto no tendrá un efecto significativo en el medio ambiente porque los efectos potenciales se mitigarían a un nivel menos que significativo a través de la incorporación de las medidas de mitigación. Los impactos potencialmente significativos para cuales se incorporaron medidas de mitigación incluyen Recursos Biológicos. De acuerdo con la Sección 15072(g)(5) de las Directrices de CEQA, se ha determinado que el sitio del proyecto no esta identificado en ninguna de las listas enumeradas bajo la Sección 65962.5 del Código del Gobierno de California en relación con los desechos peligrosos. Sus comentarios por escrito serán considerados en la decision sobre el proyecto y serán enviados a la Junta de Supervisores antes que se tome una decision sobre el proyecto. La notificación de dicha decision se enviará por correo a cualquier persona que solicite notificación. No se tomará ninguna decision hasta después de que se complete el período de revision.

CONTACTO Para más información sobre este proyecto o para recibir una copia del Estudio Inicial Preliminar con Propuesta Declaración Negativa Mitigada, por favor comuníquese con Frances Segovia, Senior Transportation Planner, Riverside County Transportation Department, llamando (951) 955-1646 o por correo electrónico a fsegovia@rivco.org. De conformidad con la Ley de Estadounidenses con Discapacidades (ADA, por su acrónimo en inglés), las personas con discapacidades pueden solicitor adaptaciones razonables, ayudas auxiliaries y servicios sin costo, para participar en la reunion poniéndose en contacto con la persona mencionada anteriormente al menos tres (3) días laborales antes del evento programado. Este documento está disponible en formatos alternativos a pedido.

NOTICE OF DETERMINATION

COUNTY OF RIVERSIDE TRANSPORTATION DEPARTMENT

EA No._____ SCH# 2023060768

PROJECT NAME: Railroad Avenue Bridge Replacement Project

DESCRIPTION AND LOCATION: The County of Riverside Transportation Department (County) proposes to replace two existing, structurally deficient timber bridges over Fornat Wash and East Channel Stubbe Wash along Railroad Avenue. The new bridges would be in the same location and would replace the existing timber bridges with new modern concrete bridges. The bridges are being replaced so that the roadway can meet current vehicle load and safety standards. Construction is anticipated to take six months per bridge. During construction, a Traffic Management Plan would be prepared to address closures of the road.

1. The project **will** ☐ **will not** ☒ have a significant effect on the environment.
2. ☐ An Environmental Impact Report (EIR) was prepared for this project pursuant to the provisions of CEQA
3. ☒ A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
4. Mitigation measures **were** ☒ **were not** ☐ made a condition of the approval of this project.
5. A Mitigation Monitoring plan **was** ☒ **was not** ☐ adopted.
6. Findings and a Statement of Overriding Considerations **was** ☐ **was not** ☒ adopted for this project.

☒The project will not have a significant effect on the environment and a Mitigated Negative Declaration has been adopted pursuant to CEQA and may be examined, along with administrative record, at the Transportation Department, 3525 14th Street, 2nd Floor, Riverside, California 92501 and https://rcprojects.org/railroadbridges.
☐The Final EIR may be examined, along with administrative record, at the Transportation Department, 3525 14th Street, 2nd Floor, Riverside, California 92501 and https://rcprojects.org/railroadbridges.

Jan Bulinski Title Environmental Project Manager Date 2/3/2025

Jan Bulinski

Title Director of Transportation Date 2/3/2025

Dennis Acuna

HEARING BODY OR OFFICER		ACTION ON PROJECT	
XX	Board of Supervisors	_____	Approval
_____	Planning Commission	_____	Disapproval

Board of Supervisors Meeting Date/Item #: _____

Verifier Name/Title: Signature: Date: