

State Route 78

Ramona Asset Management Project

SAN DIEGO COUNTY, CALIFORNIA

11-SD-78 PM 33.7/37.3

Project Number: 11-43088/1119000195

State Clearinghouse Number: 2024040691

Initial Study with Negative Declaration



Prepared by the
State of California Department of Transportation

June 2024



General Information About This Document

Document prepared by: California Department of Transportation (Caltrans)

The Initial Study circulated to the public for 30 days between April 15, 2024 and May 15, 2024. Comments received during this period are included in Appendix C.

Elsewhere, language has been added throughout the document to indicate where a change has been made since the circulation of the draft environmental document.

Minor editorial changes and clarifications have not been so indicated.

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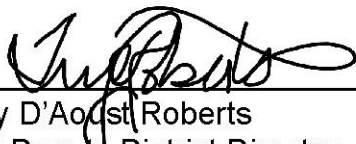
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The proposed project would construct improvements to various transportation assets along State Route 78 (from PM 33.7 to 37.3) in the community of Ramona in San Diego County, including pavement rehabilitation, culvert rehabilitation, traffic signal upgrades, Complete Streets and mobility elements, and safety/roadside elements.

**INITIAL STUDY
with Negative Declaration**

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

THE STATE OF CALIFORNIA
Department of Transportation



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04/11/2024

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Negative Declaration

Pursuant to: Division 13, Public Resources Code

State Clearinghouse Number: 2024040691

District-County-Route-Post Mile: 11-SD-78 PM 33.7/37.3

EA/Project Number: 11-43088/1119000195

Project Description

The California Department of Transportation (Caltrans) proposes to rehabilitate and enhance various assets on State Route 78 in San Diego County, between Post Mile (PM) 33.7 and PM 37.3 in the community of Ramona. Proposed improvements include pavement rehabilitation; culvert rehabilitation; Traffic Management System improvements such as traffic signal upgrades; Complete Streets and mobility elements such as Americans with Disabilities Act (ADA) curb ramps; and safety/roadside element improvements, including guardrails, end-treatments, and dikes.

Determination

An Initial Study has been prepared by Caltrans District 11. On the basis of this study, it is determined that the proposed action would not have a significant effect on the environment with the incorporation of standard avoidance and minimization measures.

The proposed project would have no effect on the following resource areas:

- Agriculture and Forestry Resources
- Cultural Resources
- Energy
- Geology and Soils
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation

- Transportation
- Utilities and Service Systems
- Tribal Cultural Resources

In addition, the proposed project would have less than significant effects on the following resource areas:

- Aesthetics
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality



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06/06/2024

Date

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Chapter 1 **Proposed Project**

1.1 Introduction

The proposed State Route 78 Ramona Asset Management Project (project) intends to rehabilitate and enhance multiple transportation assets on State Route 78 in eastern San Diego County within the unincorporated community of Ramona. The project is generally bounded on the western end by the intersection of State Route 78 and West Haverford Road and on the eastern end by the intersection of State Route 78 and Ransom Hill Lane. The project area extends along State Route 78 for approximately 3.6 miles. Within the project area, State Route 78 is a two-lane highway until its intersection with State Route 67, at which point it becomes Main Street, a four-lane thoroughfare extending through downtown Ramona. To the east of downtown Ramona, State Route 78 becomes Julian Road, a two-lane rural roadway that travels east to Santa Ysabel. The primary land uses in the area include rural residential, industrial, retail, service commercial, and open space uses.

The proposed project is a State Highway Operation and Protection Program (SHOPP) project with Pavement Rehabilitation as the main asset. The proposed project would be funded through the State Highway Operation and Protection Program. The project also proposes to rehabilitate other assets related to drainage, safety, signs, roadside safety, mobility, and Complete Streets.

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

1.2 Purpose and Need

1.2.1 Purpose

The purpose of the proposed project is to extend the service life of the highway and improve the ride quality of the pavement. Assets for drainage, mobility, safety, and Complete Streets would also be replaced or upgraded to support the service life of the roadway.

1.2.2 Need

The project is needed to improve deteriorated pavement. An assessment of the pavement in 2020 identified 9.1 lane miles that are in fair or poor condition with areas of pavement showing a high degree of cracking. Pavement rehabilitation is needed to repair the highway and improve the ride quality.

Drainage within the project boundary shows culverts and drains that exhibit poor condition. Improvements to drainage systems would protect the traveling public by maintaining the water flow in the area and prevent deterioration of the roadway.

Curb ramps need to be upgraded to meet current standards and comply with Americans with Disabilities Act (ADA) regulations to enhance mobility for pedestrians. Vehicular mobility such as traffic signals need replacement in areas that interfere with curb ramp upgrades and pavement rehabilitation.

Safety elements such as signage and guardrail upgrades or installation would be included in the project. The existing signs would be upgraded to increase visibility. Guardrails would also need to be upgraded and enhanced for the safety of errant vehicles.

Complete Streets elements such as crosswalks would need to be enhanced to improve access for other forms of mobility.

1.3 Project Description

The proposed project intends to rehabilitate and enhance multiple transportation assets on State Route 78 in San Diego County. The project encompasses post mile 33.7 to post mile 37.3, which contains unincorporated areas, including the community of Ramona. Pavement rehabilitation is the main asset. Rehabilitation includes removal of distressed pavement, replacement with new asphalt, and replacement and enhancement of shoulders, dikes that are used to convey runoff, traffic stripes and markings.

The project also proposes rehabilitating other assets related to drainage, safety, signs, roadside safety, mobility, and Complete Streets. The types of work include replacing and enhancing existing culvert systems and drains; upgrading existing curbs into Americans with Disabilities Act standard curb ramps; replacing or relocating traffic management systems such as traffic signals, pedestrian poles, pull boxes, and vehicle detection systems; replacing roadside signs; upgrading crosswalks and parking stalls, and restriping traffic lanes; and replacing and installing guardrails.

Project vicinity and location maps are shown in Figures 1-1 and 1-2, respectively, on the following pages.

Figure 1-1: Project Vicinity Map

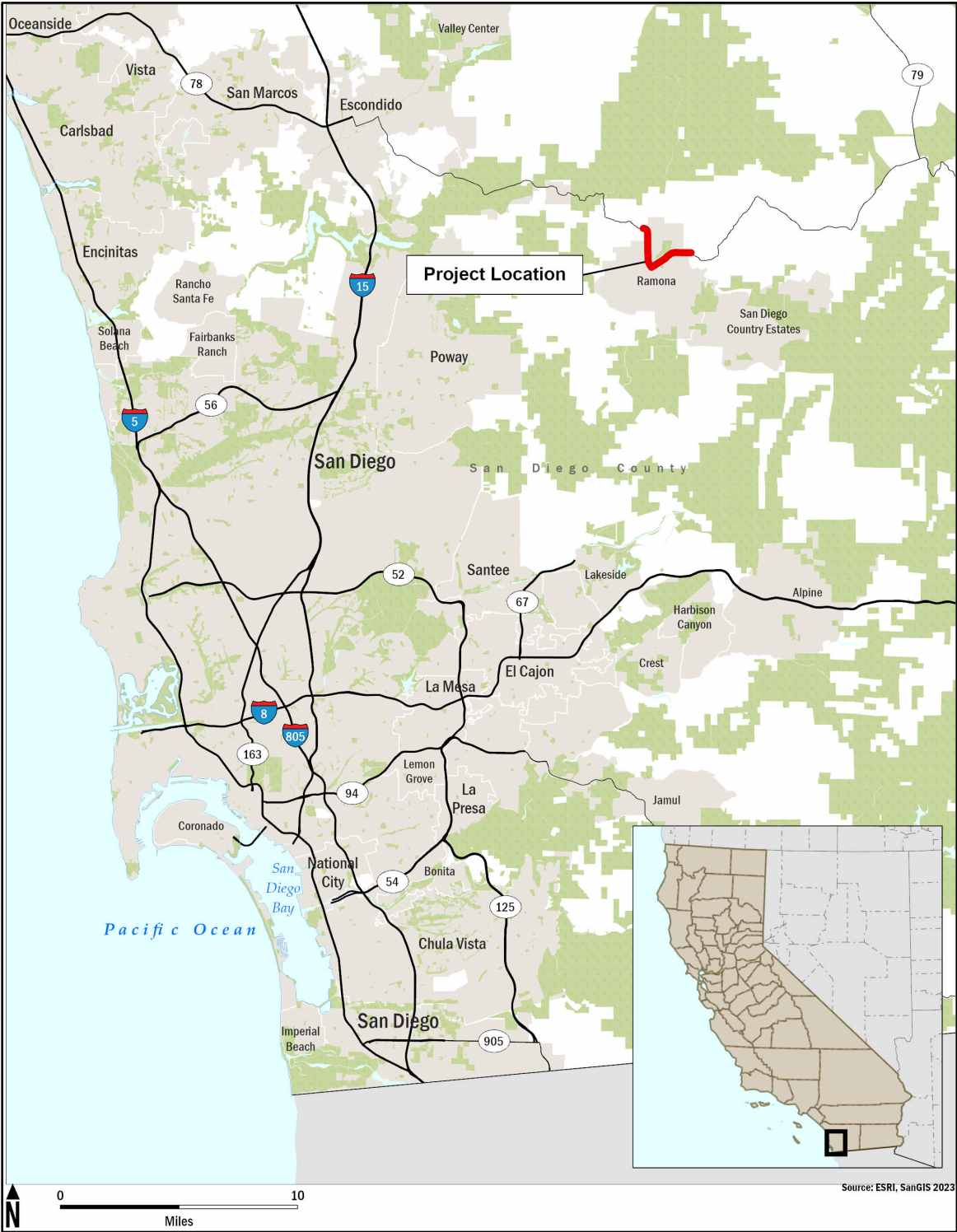


Figure 1-2: Project Location Map



1.4 Project Alternatives

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

1.4.1 Build Alternative

The Build Alternative, also referred to as the proposed project, contains a number of standardized project measures that are used on most, if not all, Caltrans projects and were not developed in response to any specific environmental impact resulting from the proposed project. These measures are listed in Section 1.5.

The Build Alternative proposes to rehabilitate and enhance multiple assets on State Route 78 from post mile 33.7 to post mile 37.3 in the community of Ramona. The main asset for the proposed project is pavement rehabilitation, which would repair or replace distressed pavement on State Route 78 that is in fair, poor, or critical condition. Improvements to other assets are also included in the Build Alternative. The proposed improvements under the Build Alternative are discussed below in greater detail.

Pavement Rehabilitation (Anchor Asset)

The Build Alternative would implement pavement rehabilitation at various locations along State Route 78. The proposed pavement rehabilitation includes removal of distressed pavement, replacement with new asphalt, and replacement and enhancement of shoulders, dikes that are used to convey runoff, traffic stripes and markings. Pavement replacement methods would include the following:

- Cold planing - A technique used to grind away existing asphaltic concrete (AC) pavement to a specific depth and replacing with base and top layers of new asphalt.
- Digout – A strategy used for pavement areas that have localized distress which would remove partial depth of the existing asphaltic concrete pavement and recompact an aggregate base material at specific locations.
- Dike replacement – Replacing existing asphaltic concrete dikes to control runoff.
- Shoulder rehabilitation – Improving graded areas on the side of the roadway, up to 4 feet from the edge of pavement.

Culvert Replacements and Drainage Improvements

The Build Alternative would replace or rehabilitate 12 pipe segments for five culvert systems within the project limits. Culvert replacement would replace

existing pipes and require trenching, ground disturbance, and vegetation removal. Rehabilitation includes culvert relining. Additional end treatment repairs may be needed, including repairing flared end sections and/or headwalls, joint sealing/repair, stabilizing embankments, debris removal or sediment flushing, and removing vegetation. Culverts would be replaced or rehabilitated at the following locations on State Route 78:

- Post mile 33.90
- Post mile 34.50
- Post mile 35.21
- Post mile 35.80
- Post mile 35.75

The Build Alternative would also replace offside drains, drainage features that convey flows off the roadway, at 10 locations.

Guardrail Systems

The Build Alternative would replace existing nonstandard metal beam guardrail with Midwest Guardrail Systems at 10 locations and add new Midwest Guardrail Systems at seven headwall locations within the project limits. The proposed guardrail and end treatments would extend or add new elements to the roadside. The work would require grading and vegetation removal.

Complete Streets Improvements

The Build Alternative would install crosswalks on State Route 78 at Olive Street to bring these crosswalks up to current standards. Existing traffic lanes would be restriped, along with parking stalls at Main Street. Crosswalks previously installed as part of the Downtown Ramona Improvements Project at the intersections of 10th Street and 7th Street would be replaced in-kind with decorative, stamped asphalt.

Curb Ramps

The Build Alternative would upgrade 23 existing curb ramps and install two new curb ramps to meet Americans with Disabilities Act standards. Curb ramp changes are proposed on State Route 78 at intersections with Olive Street, 10th Street, 9th Street, 8th Street, 7th Street, and 6th Street.

Traffic Management Systems and Safety Improvements

The Build Alternative would replace or relocate traffic management systems such as traffic signals, pedestrian poles, pull boxes, and vehicle detection systems. Traffic signals would be upgraded at the intersections of Olive Street, 10th Street, and 7th Street. Existing vehicle detections systems would

be replaced in the pavement at six locations along State Route 78. Existing roadside signs would be replaced at various locations within the project limits.

Construction Activities and Schedule

Construction of the Build Alternative is expected to begin in December 2026 and last approximately 9 months, with an opening year of 2028. Typical construction processes would involve vegetation removal, grading, excavation, pavement removal/repaving, trenching for conduit installation, lane restriping, and end treatment repairs to project elements such as culverts. Anticipated construction equipment includes dump trucks, backhoes, concrete mixer trucks, street sweepers air compressors, generators, auger drill rig, pneumatic tools (e.g., jack hammer, impact wrenches), concrete saws, vacuums, and hand tools. Contractors may use additional equipment depending on logistics and timing. Nighttime construction may occur in select areas. Vegetation removal would be limited to minor clearing/grubbing within the right-of-way; no tree removal is anticipated. The historic eucalyptus trees along Main Street in Ramona would be identified on plans and specifications as environmentally sensitive areas (ESAs) and would be avoided during construction. Sensitive natural resources adjacent to Santa Maria and Hatfield Creeks would also be designated as ESAs and avoided; no work within either creek or the adjacent riparian area would occur. Soil off haul and disposal of construction debris would also be required.

Construction staging would occur in the vicinity of A Street and Olive Street along the State Route 78 corridor. To the extent feasible, staging areas would be located within Caltrans right-of-way. Temporary construction easements with private property owners may be required due to site constraints, access limitations, or safety needs. Any temporary easements would be negotiated by Caltrans pending project approval and after final design. The Build Alternative would not result in any residential or commercial property relocations.

1.4.2 No-Build (No-Action) Alternative

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

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

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

This project would incorporate standardized measures and Best Management Practices (BMPs), which are employed on most, if not all, Caltrans projects and were not developed in response to any specific environmental impact resulting from the proposed project. These measures are addressed in more detail by resource area in the Environmental Consequences sections found in Chapter 2.

- The construction contractor must comply with the San Diego County Air Pollution Control District (SDAPCD) Rule 55 and Caltrans' Standard Specifications 14-9. Section 14-9 includes specifications requiring compliance with applicable laws and regulations related to air quality, including air pollution control district regulations and local ordinances. Per Section 14-9, waste or material generated from construction activities would not be disposed of by burning.
- Water palliative would be applied to the site and equipment as often as necessary to control fugitive dust emissions. Fugitive emissions generally must meet a "no visible dust" criterion either at the point of emissions or at the right-of-way line, depending on local regulations.
- Construction equipment and vehicles would be properly tuned and maintained, and would use low sulfur fuel as required by California Code of Regulations Title 17, Section 93114.
- Equipment and materials storage sites would be located as far away from residential and park uses as feasible, and construction areas would be kept clean and orderly.
- To the extent feasible, construction traffic would be scheduled and routed to reduce congestion and related air quality impacts caused by idling vehicles along local roads during peak travel times.
- The construction contractor shall utilize alternative fuels such as renewable diesel-fueled or solar-powered construction equipment, as feasible.
- The construction contractor shall implement an idling limit of 5 minutes or less for delivery trucks and other diesel-powered equipment (with some exceptions).
- The construction contractor shall schedule truck trips outside of peak morning and evening commute hours and implement a Traffic Management Plan (TMP), to be developed during the design phase, to minimize the effects to traffic.

- The construction contractor shall reduce construction waste including project features as applicable (such as salvaging rebar from demolished concrete and process waste).
- The construction contractor shall encourage improved fuel efficiency from construction equipment through ensuring that construction equipment is maintained and properly tuned and equipment has been correctly sized for the job.
- The construction contractor shall provide construction personnel with the knowledge to identify environmental issues and Best Management Practices to minimize impacts to the human and natural environment. The construction contractor shall supplement existing training with information regarding methods to reduce greenhouse gas emissions related to construction.
- The construction contractor shall use recycled water or reduce consumption of potable water for construction.
- The construction contractor shall reduce the need for transport of earthen materials by balancing cut and fill quantities.
- The construction contractor shall salvage large removed trees for lumber or similar on-site beneficial uses other than standard wood-chipping.
- The construction contractor shall select long-life, permeable pavement materials that lower the rolling resistance of highway surfaces as much as possible while still maintaining design and safety standards.
- The construction contractor shall use cold in-place recycling for pavement rehabilitation, as feasible.
- The construction contractor shall replace lighting with ultra-reflective sign materials that are illuminated by headlights to reduce energy used by electric lighting.
- Construction crews would implement and maintain stormwater and erosion control Best Management Practices described in the Caltrans Construction Site (Best Management Practices) Manual (Caltrans 2017) and follow specifications in Section 13 of the Caltrans Standard Specifications and associated special provisions. At a minimum, protective measures would include:
 - Preventing pollutants generated by vehicle and equipment maintenance or cleaning from entering storm drains or aquatic resources.

- Servicing or storing vehicles and equipment no less than 100 feet from storm drains or aquatic resources unless the features are protected by impermeable barriers.
- Maintaining vehicles and equipment to prevent fluid leaks.
- Storing hazardous materials such as fuels, oils, solvents, etc., in sealed containers at a designated location no less than 100 feet from storm drains or aquatic resources.
- Capturing or controlling sediment with erosion control devices such as silt fence, fiber rolls, and appropriate erosion control netting, and covering temporary stockpiles.
- The construction contractor would contain and remove noxious weeds and associated plant material and obtain all permits, licenses, agreements, and certifications for proper disposal. After construction is complete, the construction contractor would return disturbed topographical contours to preconstruction grades and apply an erosion control seed mixture containing native species.
- The Biologist would conduct preconstruction nesting bird surveys no more than 72 hours prior to the start of construction activities between February 15 and August 31. The Biologist would conduct subsequent surveys if work does not occur within 72 hours. If an active nest is discovered, the Biologist would establish an appropriately sized Environmentally Sensitive Area buffer based on species, nest location, sensitivity to disturbance, and/or the intensity or type of construction activities. Work would not occur in the Environmentally Sensitive Area until the nest is inactive and fledglings are independent of adults.
- For hazardous waste generated on the job site, the Water Pollution Control (WPC) manager must be knowledgeable of proper handling and emergency procedures for hazardous waste as demonstrated by submitting a training certificate that indicates completion of training required under 22 California Code of Regulations Section 66265.16, per Caltrans Standard Specifications 14-11.01.
- The construction contractor, upon discovery of unanticipated asbestos and/or hazardous substance, is required to immediately stop working in the area of discovery and notify Caltrans Environmental Engineering per Caltrans Standard Specifications 14-11.02. Environmental Engineering will use on-call Construction Emergency Response Contract to perform any required work.
- The construction contractor is required, per Caltrans Standard Specifications 14-11.03, to handle, store, and dispose of hazardous waste under 22 California Code of Regulations Div. 4.5.

- A Lead Compliance Plan under Caltrans Standard Specifications 7-1.02K(6)(j)(ii) would be required during construction when handling lead-contaminated soils, as well as removal of lead-based paint, thermoplastic, painted traffic stripe, and/or pavement marking.
- Excavation, transportation, and handling of material containing hazardous waste or contamination must result in no visible dust migration. When clearing, grubbing, and performing earthwork operations in areas containing hazardous waste or contamination, a water truck or water tank must be provided on the job site per Caltrans Standard Specifications 14-11.04.
- The construction contractor is not permitted to stockpile material containing hazardous waste or contamination unless ordered. Stockpiles containing hazardous waste or contamination must not be placed where affected by surface run-on or run-off. Stockpiles are not permitted in Environmentally Sensitive Areas. Stockpiled material must not enter storm drains, inlets, or Waters of the State. These requirements are provided in Caltrans Standard Specifications 14-11.05.
- The construction contractor is designated the generator of hazardous waste produced from materials the construction contractor has brought to the job site per Caltrans Standard Specifications 14-11.06.
- Removal of any treated wood waste (TWW) (e.g., wooden posts for guardrails, signs, barriers, or piles) would require proper handling and disposal per Caltrans Standard Special Provisions (SSP) 14-11.14. Treated wood waste products contain hazardous chemical preservatives; therefore, treated wood waste is considered a California Hazardous Waste.
- Imported local materials from either a (1) noncommercial source, or (2) source not regulated under California jurisdiction, must be evaluated and approved for use by Environmental Engineering Branch per Caltrans Standard Specifications 6-1.03B.
- Minimization measures to reduce traffic impacts resulting from construction activities would be implemented with the Traffic Management Plan including appropriate staging, timing, and sequencing of activities; maintenance of traffic in both directions; and advanced notification to motorists and nearby communities to inform the public of potential delays.
- Prior to construction activities, the construction contractor would contact utilities, DigAlert services, and/or other applicable entities to mark underground facilities, as needed.
- Emergency service providers and first responders would be notified of construction sequencing and the potential for temporary lane closures and/or changes to traffic circulation, as identified in the Traffic Management Plan.

1.6 Identification of a Preferred Alternative

There were two alternatives assessed in this document: the Build Alternative and No-Build Alternative. After comparing and weighing the benefits and impacts of all feasible alternatives, the Project Development Team has identified the Build Alternative as the preferred alternative. With incorporation of standardized avoidance measures and BMPs, and with consideration of the community benefits provided by project features, there would be minimal impacts from implementation of the Build Alternative. Additionally, based on the outreach completed and public comments received on the project to-date, there are no identified areas of public controversy that would affect the project. The Build Alternative would meet the identified purpose and need (Section 1.2 of this document) which comprise the proposed project assessed in this document.

1.7 Discussion of the NEPA Categorical Exclusion

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

1.8 Permits and Approvals Needed

No permits are anticipated for the proposed project.

Chapter 2 CEQA Evaluation

2.1 CEQA Environmental Checklist

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

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

“No Impact” determinations in each section are based on the scope, description, and location of the proposed project as well as the appropriate technical report, and short discussions are included in this document.

2.1.1 Aesthetics

Considering the information in the Visual Impact Assessment dated November 29, 2023, the following significance determinations have been made:

Except as provided in Public Resources Code (PRC) Section 21099:

Question—Would the project:	CEQA Significance Determinations for Aesthetics
a) Have a substantial adverse effect on a scenic vista?	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact

Question—Would the project:	CEQA Significance Determinations for Aesthetics
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No Impact

Regulatory Setting

CEQA establishes that it is the policy of the state to take all action necessary to provide the people of the state “with...enjoyment of aesthetic, natural, scenic and historic environmental qualities” (Public Resources Code Section 21001[b]).

California Streets and Highways Code Section 92.3 directs Caltrans to use drought-resistant landscaping and recycled water when feasible and to incorporate native wildflowers and native and climate-appropriate vegetation into the planting design when appropriate.

Affected Environment

Existing Visual Resources

The proposed project is within the community of Ramona in unincorporated San Diego County. Within the project limits, State Route 78 is predominantly a two-lane highway with one curve section through flat terrain. There are no sidewalks until State Route 78 becomes Main Street through downtown Ramona, and vertical elements consist of utility poles and trees. This segment of State Route 78 has low to moderate visual quality due to low levels of unity, vividness, and intactness, which are criteria established by the Federal Highway Administration. Scenic vistas are minimal given the flat terrain, although rural portions of the project area provide some scenic views of hillsides in the distance and unaltered landscapes.

This portion of State Route 78 is not an eligible or designated State Scenic Highway (Caltrans 2019).

The proposed project begins in a rural area of moderate visual quality and transitions to industrial and commercial land uses of low visual quality through

downtown Ramona. State Route 78/Main Street in Ramona is a Historic District from 10th Street to 5th Street. Along Main Street between 7th Street and 10th Street, including the Main Street/10th Street intersection, recent improvements were made in 2023 as part of Caltrans' Clean California Project (CA Beautification project). The CA Beautification project included safety and walkability improvements such as the repainting of light posts to a brown color, and the addition of textured and colored stamped asphalt concrete crosswalks (reddish-brown brick paving) to increase a sense of place and community character.

A portion of the Ramona Main Street Colonnade Historic district is within the project limits. This district consists of approximately 2 miles of more than 300 eucalyptus trees, which characterizes Main Street in Ramona and provides scenic views at the entryway to the community. Within the current project limits, a total of 14 contributing eucalyptus trees are present between 10th Street and 9th Street where the northern resource boundary terminus of the Ramona Main Street Tree Colonnade is located.

Existing Viewers

Affected viewers are primarily motorists on the highway traveling at moderate to high speeds. Area residents and daily commuters would have moderate awareness due to their familiarity with the drive. Ramona residents would be aware of curb ramp and crosswalk striping changes—especially within the Ramona Historic District. Viewer sensitivity to changes caused by this project would be low.

Existing Light and Glare

The proposed project crosses through both rural and semi-rural/urban settings. The northern portion of the project limits does not contain street lighting and has very limited light sources overall. Through downtown Ramona in the central portion of the project, light sources are those typical of an urban environment, such as streetlights, security lights, car lights, and residential lights. Existing glare is from windows and other building materials.

Environmental Consequences

There are minimal scenic vistas or views within the project limits. The proposed project would make highway improvements without altering scenic features or inhibiting scenic viewpoints in the area. Project construction would be short term, and equipment use and storage would only be briefly visible to motorists on the roadway. The proposed project is not located within a designated State Scenic Highway, and it would not alter any scenic resources such as trees, rock outcroppings, or historic buildings within a State Scenic highway. Project improvements would be focused on existing highway assets (pavement, guardrails, culverts, crosswalks, and signage), which do not provide scenic value. Therefore, there would be no impact to scenic vistas or scenic resources.

Operation of the proposed project would not introduce any new light sources. Roadside sign panels would be replaced, but this would not substantially increase glare in the area. Light and glare levels would remain similar to existing conditions following project implementation. Nighttime construction may occur in select areas but would be temporary and focused on the roadway. Therefore, there would be no impact due to new sources of substantial light or glare in the area.

The proposed project would result in minor changes to the visual character of the area. During construction, the proposed culvert work would require grading, trenching, and vegetation removal (clearing/grubbing only). The proposed complete street and mobility improvements include Americans with Disabilities Act curb upgrades, striping, and signage. New high visibility crosswalk pavement markings could cause each crossing to appear more urban. Additionally, new roadway signs could change the visual character of spot locations. The proposed guardrail and end treatments would extend or add new elements to the roadside. The work would require grading and vegetation removal. Native vegetation along the edge of pavement would be displaced by the guardrail. Visual quality and intactness of the rural setting would be reduced by the long runs of guardrail. The area would appear more urban in these locations. Overall, however, the proposed project would cause minimal change to the existing character of this segment of State Route 78. Viewer sensitivity to anticipated visual changes is considered low except where changes affect the Ramona Historic District. Collectively, the “low” change in visual resources combined with the “low” viewer response indicates the project will result in a “low” visual impact with implementation of the avoidance measures listed below as project features. Therefore, the impact on visual character and quality would be less than significant.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following avoidance and minimization measures as project features:

- No installation of continental crosswalk striping over the stamped asphalt brick paving at the 10th Street or 7th Street locations.
- Replace existing stamped asphalt brick paving at the 7th Street crossing in-kind to match the 10th Street enhanced crosswalk for consistency with the Historic District.
- Within the Historic District, curb ramps would be integrally colored and with an exposed sand finish to appear as older concrete. Truncated domes would be either brown or gray (not yellow).
- Minimize impacts to the existing enhanced crosswalk paving at 10th Street and replace any removed pavement in-kind.

- Pedestrian push button poles within the Ramona Historical District would be painted to match the signal poles at 10th Street (Color No. 33105 of FED-STD-595).
- No equipment, material storage, or vehicles are allowed under the dripline of trees within or outside of the construction footprint.
- Avoid tree removal and severe tree pruning. Pruning and shaping of trees shall be performed under the direct supervision of a certified arborist, and as directed and approved by the State's Engineer.
- Protect vegetation outside of the work area limits by prohibiting material storage, parking, machinery, and construction access in vegetated areas.
- Permanent and temporary fiber rolls (if used) must be biodegradable (no plastic) per Caltrans Standard Specifications 13-10.02B.
- Hydroseed disturbed areas with a non-irrigated native seed mix as permanent erosion control. Remove temporary hydraulic mulch prior to hydroseeding. Break up or scarify the soil surface to a 2-inch depth before applying hydroseed. Use the suggested mix design as specified in the Visual Impact Assessment, or modify the mix as directed by the Project Biologist.
- Perform roadside clearing to remove weeds prior to clearing and grubbing work areas adjacent to habitat. At all hydroseeded and guardrail areas, perform roadside clearing to remove weeds at the beginning of the Permanent Erosion Control Period (PECE) and prior to closing the contract.
- Permanent erosion control (non-irrigated hydroseed or dry seed) must be applied in the winter work window between November 1 and February 28. If areas to receive permanent erosion control are not ready within the winter work window, then hydroseed and dry seed will be applied at the start of PECE within the work window.

2.1.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon

measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Question—Would the project:	CEQA Significance Determinations for Agriculture and Forestry Resources
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?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact
c) Conflict with existing zoning, 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))?	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact
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?	No Impact

Discussion of Agriculture and Forestry Resources Evaluation

As designated by the California Department of Conservation, the majority of the project area is within and surrounded by urban, built-up land, with some areas designated as farmland of local importance (California Department of Conservation 2020). The project site is not within or adjacent to designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor does the project site contain forest lands. The project site is within the Caltrans right-of-way and is not zoned for agricultural or forest use. Additionally, there are no Williamson Act contract lands within the project limits (California Department of Conservation 2022). Therefore, the proposed project would have no impact on agriculture and forestry resources.

2.1.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district are relied upon to make the following determinations.

Question—Would the project:	CEQA Significance Determinations for Air Quality
a) Conflict with or obstruct implementation of the applicable air quality plan?	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less Than Significant Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant Impact

Regulatory Framework

The Federal Clean Air Act, as amended, is the primary federal law that governs air quality while the California Clean Air Act is its companion state law. These laws, and related regulations by the U.S. Environmental Protection Agency (USEPA) and California Air Resources Board (ARB), set standards for the concentration of pollutants in the air. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). At the state level, these standards are called California Ambient Air Quality Standards (CAAQS). NAAQS and CAAQS have been established for six criteria pollutants that have been linked to potential health concerns (shown in Table 2-1 below): 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 (PM_{2.5}); lead (Pb); and sulfur dioxide (SO₂). In addition, the CAAQS also include standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. The NAAQS and CAAQS are set at levels that protect public health with a margin of safety and are subject to periodic review and revision. Both state and federal regulatory frameworks also cover toxic air contaminants (air toxics); some criteria pollutants are also air toxics or may include certain air toxics in their general definition.

Table 2-1: Criteria Air Pollutant Effects and Sources

Pollutant	Principal Health and Atmospheric Effects	Typical Sources
Ozone (O ₃)	High concentrations irritate lungs. Long-term exposure may cause lung tissue damage and cancer. Long-term exposure damages plant materials and reduces crop productivity. Precursor organic compounds include many known toxic air contaminants. Biogenic volatile organic compounds (VOCs) may also contribute.	Low-altitude ozone is almost entirely formed from reactive organic gases (ROGs) or volatile organic compounds (VOCs) and nitrogen oxides (NO _x) in the presence of sunlight and heat. Common precursor emitters include motor vehicles and other internal combustion engines, solvent evaporation, boilers, furnaces, and industrial processes.
Carbon Monoxide (CO)	Interferes with the transfer of oxygen to the blood and deprives sensitive tissues of oxygen. Also is a minor precursor for photochemical ozone. Colorless, odorless.	Combustion sources, especially gasoline-powered engines and motor vehicles. CO is the traditional signature pollutant for on-road mobile sources at the local and neighborhood scale.
Respirable Particulate Matter (PM ₁₀)	Irritates eyes and respiratory tract. Decreases lung capacity. Associated with increased cancer and mortality. Contributes to haze and reduced visibility. Includes some toxic air contaminants. Many toxic and other aerosol and solid compounds are part of PM ₁₀ .	Dust- and fume-producing industrial and agricultural operations; combustion smoke and vehicle exhaust; atmospheric chemical reactions; construction and other dust-producing activities; unpaved road dust and re-entrained paved road dust; natural sources.
Fine Particulate Matter (PM _{2.5})	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and produces surface soiling. Most diesel exhaust particulate matter—a toxic air contaminant—is in the PM _{2.5} size range. Many toxic and other aerosol and solid compounds are part of PM _{2.5} .	Combustion including motor vehicles, other mobile sources, and industrial activities; residential and agricultural burning; also formed through atmospheric chemical and photochemical reactions involving other pollutants including NO _x , sulfur oxides (SO _x), ammonia, and reactive organic gases (ROGs).
Nitrogen Dioxide (NO ₂)	Irritating to eyes and respiratory tract. Colors the atmosphere reddish-brown. Contributes to acid rain and nitrate contamination of stormwater. Part of the “NO _x ” group of ozone precursors.	Motor vehicles and other mobile or portable engines, especially diesel; refineries; industrial operations.

Pollutant	Principal Health and Atmospheric Effects	Typical Sources
Sulfur Dioxide (SO ₂)	Irritates respiratory tract; injures lung tissue. Can yellow plant leaves. Destructive to marble, iron, steel. Contributes to acid rain. Limits visibility.	Fuel combustion (especially coal and high-sulfur oil), chemical plants, sulfur recovery plants, metal processing; some natural sources like active volcanoes. Limited contribution possible from heavy-duty diesel vehicles if ultra-low sulfur fuel not used.
Lead (Pb)	Disturbs gastrointestinal system. Causes anemia, kidney disease, and neuromuscular and neurological dysfunction. Also, a toxic air contaminant and water pollutant.	Lead-based industrial processes like battery production and smelters. Lead paint, leaded gasoline. Aerially deposited lead from older gasoline use may exist in soils along major roads.
Sulfates	Premature mortality and respiratory effects. Contributes to acid rain. Some toxic air contaminants attach to sulfate aerosol particles.	Industrial processes, refineries and oil fields, mines, natural sources like volcanic areas, salt-covered dry lakes, and large sulfide rock areas.
Hydrogen Sulfide (H ₂ S)	Colorless, flammable, poisonous. Respiratory irritant. Neurological damage and premature death. Headache, nausea. Strong odor.	Industrial processes such as refineries and oil fields, asphalt plants, livestock operations, sewage treatment plants, and mines. Some natural sources like volcanic areas and hot springs.
Visibility Reducing Particles (VRP)	Reduces visibility. Produces haze. Note: Not directly related to the Regional Haze program under the Federal Clean Air Act, which is oriented primarily toward visibility issues in National Parks and other "Class I" areas. However, some issues and measurement methods are similar.	See particulate matter above. May be related more to aerosols than to solid particles.
Vinyl Chloride	Neurological effects, liver damage, cancer. Also considered a toxic air contaminant.	Industrial processes.

Affected Environment

The proposed project site is in San Diego County within the San Diego Air Basin (SDAB). Air quality in the San Diego Air Basin is regulated by the U.S. Environmental Protection Agency, California Air Resources Board, and the San Diego Air Pollution Control District (SDAPCD). Each of these agencies

develops rules, regulations, or policies, and/or goals to attain the directives imposed through legislation. The San Diego Air Pollution Control District regulates most air pollutant sources, except for motor vehicles, marine vessels, aircraft, and agricultural equipment, which are regulated by the California Air Resources Board or U.S. Environmental Protection Agency. Included in the San Diego Air Pollution Control District's tasks are monitoring of air pollution, preparation of the State Implementation Plan (SIP) for the San Diego Air Basin, and promulgation of rules and regulations. Although the U.S. Environmental Protection Agency regulation may not be superseded, both state and local regulations may be more stringent.

The U.S. Environmental Protection Agency has delegated responsibility to air districts to establish local rules to protect air quality. Caltrans Standard Specifications 14-9.02 requires compliance with applicable air quality laws and regulations including local and air district ordinances and rules.

Both the U.S. Environmental Protection Agency and California Air Resources Board use ambient air quality monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. An "attainment" designation for an area signifies that pollutant concentrations did not exceed the established standard.

Table 2-2 shows attainment designations for the San Diego Air Basin. The San Diego Air Basin currently meets the NAAQS for most criteria air pollutants except ozone and meets the CAAQS for most criteria air pollutants except ozone, PM₁₀, and PM_{2.5}. The San Diego Air Basin is currently designated as a Serious Nonattainment Area for the 2008 ozone NAAQS and a Moderate Nonattainment Area for the 2015 ozone NAAQS.

The California Air Resources Board is the lead agency responsible for developing the State Implementation Plan in California. Local air districts and other agencies prepare air quality attainment plans or air quality management plans, and submit them to the California Air Resources Board for review, approval, and incorporation into the applicable State Implementation Plan. The State Implementation Plan includes strategies and tactics to be used to attain the federal ozone standard in the county. The State Implementation Plan elements are taken from the Regional Air Quality Strategy (RAQS), which the San Diego Air Pollution Control District prepares. The 1991/1992 Regional Air Quality Strategy was adopted on March 27, 1992, and includes Transportation Control Measures (TCMs) for the air quality plan prepared by the San Diego Association of Governments (SANDAG). The Regional Air Quality Strategy and corresponding Transportation Control Measures were updated and adopted in 1995, 1998, 2001, 2004, 2009, 2016, and 2022. The 2022 Regional Air Quality Strategy Revision, which identifies emission control

measures to provide expeditious progress toward attaining the state ozone standard, was adopted by the San Diego Air Pollution Control District in May 2022 (SDAPCD 2022). The rules and regulations include procedures and requirements to control the emission of pollutants and prevent adverse impacts.

Table 2-2: San Diego Air Basin Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (8-Hour)	Nonattainment	Nonattainment
Ozone (1-Hour)	Attainment ¹	Nonattainment
Carbon Monoxide	Attainment	Attainment
PM ₁₀	Unclassifiable ²	Nonattainment
PM _{2.5}	Attainment	Nonattainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility	No Federal Standard	Unclassified

Notes:

¹The federal ozone (1-hour) standard of 12 parts per million was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because this benchmark is addressed in State Implementation Plans.

²At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

Source: Attainment Status (sdapcd.org), 2024.

Environmental Consequences

Construction activities for the proposed project would generate temporary emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_x), CO, sulfur oxides (SO_x), PM₁₀, and PM_{2.5}. Ozone, a regional pollutant derived from NO_x and VOCs in the presence of sunlight and heat, would be indirectly produced.

Construction-related emissions of VOCs, NO_x, CO, and particulate matter would primarily be associated with off-road and on-road equipment exhaust as well as fugitive dust associated with demolition and ground disturbance activities. SO₂ is generated by oxidation during combustion of organic sulfur compounds contained in diesel fuel. Under California law and California Air Resources Board regulations, off-road diesel fuel used in California must meet the same sulfur and other standards as on-road diesel fuel (not more

than 15 parts per million sulfur), so SO₂-related issues due to diesel exhaust would be minimized through compliance with existing regulations.

Emissions associated with construction of the proposed project were calculated using the Caltrans Construction Emissions Tool (CAL-CET [version 2021v1.0.2]) and are shown in Table 2-3. Emissions are compared to the San Diego Air Pollution Control District Air Quality Impact Analysis (AQIA) Trigger Levels in Regulation II, Rule 20.2, which are applicable to new or modified stationary sources. Although these trigger levels do not generally apply to mobile sources and construction activities, for comparative purposes these levels may be used to evaluate the increased emissions and demonstrate that a project's emissions would not result in a significant impact on air quality (County of San Diego 2007).

Table 2-3: Daily Construction Emissions

Phase	Total Organic Gases	Volatile Organic Compounds	CO	NO _x	PM ₁₀	PM _{2.5}
Daily Average (pounds per day)	1.5	1.3	9.6	9.9	5.2	1.1
Project Maximum Daily Emissions (pounds per day)	2.4	2.2	17.1	15.7	55.3	5.6
Threshold of Significance ¹	Not applicable	Not applicable	550	250	100	67
Significant Impact?	Not applicable	Not applicable	No	No	No	No

Notes:

TOG = Total Organic Gases; VOCs = volatile organic compounds; CO = carbon monoxide; NO_x = nitrogen oxides; PM₁₀ = particles 10 micrometers or smaller; PM_{2.5} = particles 2.5 micrometers or smaller

¹San Diego Air Pollution Control District Air Quality Impact Analysis Trigger Levels in Regulation II, Rule 20.2

² The preliminary project construction schedule identifies potential overlap between construction activities. Emissions during potential overlapping activities would remain below significance thresholds.

Source: Caltrans 2024c

As shown in Table 2-3, construction-related emissions would not exceed the San Diego Air Pollution Control District Air Quality Impact Analysis trigger levels. Construction impacts to air quality are short term in duration and, therefore, would not result in long-term adverse conditions or 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.

Operational emissions for the proposed project are expected to remain similar to existing conditions because the project would replace or rehabilitate existing facilities without increasing capacity or inducing additional vehicle travel. The improvements proposed by the project would allow for operational efficiencies in vehicle travel on State Route 78 due to pavement rehabilitation, new transportation management system elements, and signage. Further, the project would improve existing curb ramps and crosswalks along the corridor, which would improve pedestrian facilities in the area and also be compatible with future bicycle facilities. As such, operation of the project would not result in long-term air quality impacts. This impact would be less than significant.

The primary air pollutant exposure from the project would occur during construction from toxic air contaminants associated with construction equipment exhaust. Sensitive receptors (residences, schools, and childcare centers) are located along State Route 78 in proximity to the project limits. The total duration of construction activities is anticipated to be approximately 9 months; the exposure of sensitive receptors to construction emissions would be short term. Construction would only occur intermittently and would progress linearly without concentrated emission exposure in any one location. In addition, as described above, the proposed project construction emissions would not exceed the San Diego Air Pollution Control District Air Quality Impact Analysis trigger levels. The San Diego Air Pollution Control District Air Quality Impact Analysis trigger levels may be used to evaluate the increased emissions from projects and to demonstrate that a project's emissions would not result in a significant impact to regional air quality and impede attainment of air quality standards for the region. Because regional air quality standards have been established for these criteria pollutants to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution, these trigger levels can also be used to assess project emissions and inform the project's impacts to regional air quality and health risks. Standard measures detailed in Section 1.5 would be implemented as part of the project to minimize construction-related emissions. For example, toxic air contaminants and criteria pollutant emission exposure would be reduced with implementation of the idling limits and San Diego Air Pollution Control District rules and regulations. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and this impact would be less than significant.

Construction activities associated with the proposed project could result in short-term odor emissions from diesel exhaust associated with construction equipment and asphalt paving operations. As described above, construction would occur only intermittently and would progress linearly without concentrated emission exposure in any one location. Therefore, due to the highly diffusive properties of diesel exhaust and asphalt odors, and short-term nature of construction, nearby receptors would not be affected by other emissions, such as those leading to odors, for an extended period of time. Implementation of the standard measures in Section 1.5, including

compliance with San Diego Air Pollution Control District rules and regulations (San Diego Air Pollution Control District Rule 51, Nuisance) would also minimize any impacts during construction. Since the project proposes to rehabilitate existing facilities, operation of the proposed project would remain similar to existing conditions. Therefore, the proposed project would not result in other emissions, such as those leading to odors, affecting a substantial number of people. This impact would be less than significant.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measures to avoid or minimize air quality effects:

- The construction contractor must comply with San Diego Air Pollution Control District Rule 55 and Caltrans Standard Specifications 14-9. Section 14-9 includes specifications requiring compliance with applicable laws and regulations related to air quality, including air pollution control district, and air quality management district regulations and local ordinances. Per Section 14-9, waste or material generated from construction activities would not be disposed of by burning.
- Water palliative would be applied to the site and equipment as often as necessary to control fugitive dust emissions. Fugitive emissions generally must meet a “no visible dust” criterion either at the point of emissions or at the right-of-way line, depending on local regulations.
- Construction equipment and vehicles would be properly tuned and maintained, and would use low sulfur fuel as required by California Code of Regulations Title 17, Section 93114.
- To the extent feasible, construction traffic would be scheduled to reduce congestion and related air quality impacts caused by idling vehicles along local roads during peak travel times.
- The construction contractor shall utilize alternative fuels such as renewable diesel for construction equipment.
- The construction contractor shall implement an idling limit of 5 minutes or less for delivery trucks and other diesel-powered equipment (with some exceptions).
- The construction contractor shall encourage improved fuel efficiency from construction equipment through ensuring that construction equipment is maintained and properly tuned, and equipment has been correctly sized for the job.

2.1.4 Biological Resources

Considering the information in the Natural Environment Study dated April 2024, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Biological Resources
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or National Oceanic and Atmospheric Administration Fisheries?	Less Than Significant Impact
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?	No Impact
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less Than Significant Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact

Regulatory Framework

Sensitive natural resources are protected by varying degrees of local, state, and federal laws, regulations, and acts. Regulatory requirements that apply to the proposed project are listed below.

Federal

National Environmental Policy Act

The National Environmental Policy Act (NEPA) mandates federal agencies to consider and document environmental impacts of proposed actions and legislation. This act also mandates preparation of comprehensive environmental impact statements where proposed action is “major” and significantly affects the quality of the human environment.

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) provides legal framework for the protection of species identified as being endangered or threatened with extinction (listed species). Section 7 of the Federal Endangered Species Act requires federal agencies, or their delegates (e.g., Caltrans), to consult with the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS) to ensure actions they fund, authorize, permit, or otherwise carry out will not jeopardize the continued existence of any listed species or adversely modify federally designated critical habitats.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the Migratory Bird Treaty Act is extensive and is listed under 50 Code of Federal Regulations (CFR) 10.13. The Migratory Bird Treaty Act, which is enforced by the U.S. Fish and Wildlife Service, makes it unlawful “by any means or in any manner, to pursue, hunt, take, or capture birds that are listed under 50 CFR 10.13, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted.

Clean Water Act

The Clean Water Act (CWA) provides a structure for regulating water quality. The discharge of any pollutant from a point source into navigable waters is illegal unless a permit under its provisions is acquired. The U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the Clean Water Act.

In accordance with Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates the discharge of dredged or fill material into Waters of the United States (WOTUS), including wetlands.

Executive Order 11990 Protection of Wetlands

This executive order established a national policy to avoid adverse impacts on wetlands whenever there is a practicable alternative. On federally funded projects, impacts on wetlands must be identified and alternatives that avoid wetlands must be considered. If wetland impacts cannot be avoided, then all practicable measures to minimize harm must be included. This must be documented in a specific Wetlands Only Practicable Alternative Finding. This order also requires early public involvement in projects affecting wetlands.

Executive Order 13112 Invasive Species

Executive Order 13112 requires federal agencies to prevent the introduction or spread of invasive species. The order defines invasive species as “an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health.” Subsequent Federal Highway Administration guidance directs the use of the state’s invasive species list, maintained by the California Invasive Species Council, to define invasive plants that must be considered as part of the NEPA analysis for a proposed project. Under this order, federal agencies cannot “authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species unless benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.”

State and Regional

California Environmental Quality Act

The California Environmental Quality Act (CEQA) provides guidelines for defining impacts. CEQA these guidelines so local jurisdictions can determine what constitutes an “adverse effect” and significant impact on a biological resource.

California Endangered Species Act

The California Endangered Species Act (CESA) is an environmental law that conserves and protects plant and animal species at risk of extinction. The California Endangered Species Act provides a listing and review process, prohibits certain acts as damaging to listed species, and facilitates a consultation process for state projects that may result in take of a species listed under the California Endangered Species Act.

Native Plant Protection Act

The Native Plant Protection Act governs the preservation, protection, and enhancement of endangered, threatened or rare native plants listed in California Code of Regulations Title 14, Section 674.01.

Protection of Migratory Birds

Per Fish and Game Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird unless authorized.

Harassment of Animals

Per California Code of Regulations Title 14, Section 250.51, no person shall harass, herd or drive any game or nongame bird or mammal or furbearing mammal unless authorized.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (PCA) provides for statewide coordination of water quality regulations. Nine separate Regional Water Quality Control Boards were developed to oversee water quality on a day-to-day basis. Under the Porter-Cologne Water Quality Control Act, the Regional Water Quality Control Boards regulate the discharge of waste into Waters of the State (WOTS). Waters of the State that are not also Waters of the United States, are provided protection under the Porter-Cologne Water Quality Control Act. Parties proposing to discharge waste that could affect Waters of the State must file a Report of Waste Discharge with the appropriate Regional Water Quality Control Board. The Regional Water Quality Control Board will respond to a Report of Waste Discharge by issuing Waste Discharge Requirements (WDRs) in a public hearing, or by waiving the Waste Discharge Requirements for proposed discharge into state jurisdictional waters.

Lake and Streambed Alterations

Under Sections 1600-1607, California Department of Fish and Wildlife (CDFW) regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports riparian habitat and/or wildlife. Notification is generally required any activity that will affect a river, stream, lake, or their tributaries. Generally, the California Department of Fish and Wildlife is concerned with activities that have potential to impact state-regulated resources at the activity site, as well as the effects of those actions on the ecosystem at and surrounding the activity (i.e., upstream, downstream, and neighboring).

Affected Environment

Biological Study Area

The proposed project footprint includes the area of direct impacts. The Biological Study Area (BSA) includes the footprint and areas indirectly impacted by project activities. For this project, the Biological Study Area is equivalent to the action area as defined under 50 Code of Federal Regulations Section 402.02 (all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action). The Biological Study Area for this project includes the footprint and a 100-foot buffer around the footprint to account for all impacts.

Examples of direct impacts include ground disturbance from operation of equipment and staging. Examples of indirect impacts include spread of invasive weeds, which could occur after construction is completed and impacts to aquatic resources located outside the Biological Study Area from activities that occur within the Biological Study Area (e.g., stormwater discharges). Some impacts may be considered both direct and indirect, such as increased noise and artificial illumination. Both occur during construction and within the footprint; however, they may also impact resources located outside of the footprint.

The Biological Study Area is in the Peninsular Ranges subregion of the California Floristic Province. This subregion includes all mountains south of the Transverse Ranges. In general, habitats include coastal sage scrub, chaparral and oak woodlands at lower elevations, and coniferous forests at higher elevations (Baldwin et al. 2012). Soil types in the Biological Study Area include sandy loams along the road alignment and riverwash in Santa Maria and Hatfield Creeks (NRCS 2023).

Elevation in the Biological Study Area ranges from 1,420 to 1,555 feet above sea level. Topography ranges from level surfaces and gentle rolling slopes to relatively steep roadside embankments. The annual average low temperature in Ramona is 38 degrees Fahrenheit (F°) and the average annual high is 91 degrees F° (US Climate Data 2024). Ramona receives an average of 2.71 inches of precipitation between November and March (US Climate Data 2024). Existing sources of disturbance include trash along the alignment, and vandalism and encampments underneath Santa Maria Creek Bridge and Hatfield Creek Bridge, and developed landcover (paved surfaces, buildings, etc.).

Landcover

Seven land cover types are present in the Biological Study Area, as shown in Table 2-4 and described below.

Vegetation in unpaved roadside shoulders is periodically mowed and dominated by native and introduced ruderal and weedy species such as brome grasses (*Bromus spp.*), wild mustard (*Hirschfeldia incana*), tumbleweed (*Salsola tragus*); turkey mullein (*Croton setiger*), telegraph weed (*Heterotheca grandiflora*), cheeseweed (*Malva parviflora*), sea fig (*Carpobrotus edulis*), giant reed (*Arundo donax*), wild oat (*Avena sp.*), brome grasses (*Bromus spp.*), tree of heaven (*Ailanthus altissima*), castor bean (*Ricinus communis*), and western ragweed (*Ambrosia psilostachya*).

Table 2-4: Land Cover and Plant Communities in the Biological Study Area

Land Cover Type	Acres in the Biological Study Area
Diegan Coastal Sage Scrub	1.58
Coast Live Oak Woodland	0.45
Disturbed	10.74
Field/Pasture	5.44
Vineyards and Orchards	0.97
Southern Riparian Scrub	1.32
Urban/Developed	90.0
Total	110.5

Diegan Coastal Sage Scrub

This plant community is composed of a variety of low, soft, aromatic shrubs dominated by drought-deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera*). Coastal sage scrub typically includes scattered evergreen shrubs including lemonade berry (*Rhus integrifolia*), laurel sumac (*Malosma laurina*), and toyon (*Heteromeles arbutifolia*). Understory is diverse and includes a rich variety of annual forbs, and both annual and perennial grasses. Representative plants in the Biological Study Area included California buckwheat and California sagebrush.

Coast Live Oak Woodland

Coast live oak woodland consists primarily of coast live oak (*Quercus agrifolia*) and Engelmann oak (*Quercus englemannii*) with several associated understory species, including poison oak (*Toxicodendron diversilobum*), skunk brush (*Rhus trilobata*), scrub oak, and toyon. The herb layer may consist of western ragweed, Douglas mugwort (*Artemisia douglasiana*), wild oat, and brome grasses. Coast live oak with an herbaceous layer of western ragweed, wild oat, and brome grasses was present in the Biological Study Area.

Disturbed

These areas include landcover where human activities significantly altered native vegetation and species composition. This habitat is dominated by non-native annuals and perennial broadleaf species. It is typically found in vacant lots, roadsides, and areas where vegetation clearing occurred. Species found in the Biological Study Area that represent this plant community included wild mustard, giant reed, castor bean, filaree (*Erodium sp.*), Russian thistle (*Salsola sp.*), tumbleweed, sweet fennel (*Foeniculum vulgare*), horseweed (*Erigeron sp.*), sea fig, and tree of heaven.

Field/Pasture

Pasture vegetation contains a mix of grasses that normally provide 100 percent canopy closure. Height of vegetation varies from few inches to two or more feet, depending on the time of season and amount of livestock grazing. Old or poorly drained pastures may have patches of weeds more than two feet in height. During site visits, cattle were observed grazing in the Biological Study Area at locations with a full canopy closer of grasses.

Southern Riparian Scrub

This habitat is a dense, broad-leaved, winter-deciduous association dominated by several species of willow (*Salix* spp.) and mulefat (*Baccharis salicifolia*). It is often found on loose, sandy, or fine alluvium soils deposited near stream channels during floods. Most stands are too dense to allow much understory to develop. Willows and mulefat were both present within the Biological Study Area at Santa Maria and Hatfield Creeks.

Urban/Developed

Developed areas are lands that have been permanently altered by human activities. Much of these areas include roads, buildings, and other areas where the land has been altered to such a state that natural vegetation cannot become reestablished. Plants species present are mostly ornamental or planted native species. Ornamental species found in the Biological Study Area included olive (*Olea europaea*), eucalyptus (*Eucalyptus* spp.), pine (*Pinus* sp.), and planted coast live oak. The majority of the proposed work is within these areas on the paved roadway and shoulders.

Vineyards and Orchards

Orchards are not observed within the Biological Study Area. However, a small parcel with vineyard landcover is present at post mile 37. Vineyards are composed of grape-bearing vines planted in rows, usually supported on wood and wire trellises. Vines are typically intertwined within the rows but are not twined between rows. Rows under the vines are usually sprayed with herbicides to prevent growth of undesirable herbaceous plants. However, outside of the growing season, herbaceous species may be planted or allowed to grow as a cover crop to control erosion.

Aquatic Resources

Aquatic resources provide ecological functions and values for plants and animals and are important for their water detention and recharge properties. In California, many aquatic resources, including wetlands and “other waters,” are regulated under the Clean Water Act and Fish and Game Code 1602 and fall under the jurisdiction of the U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Regional Water Quality Control Board, and/or U.S. Army Corps of Engineers.

Santa Maria Creek (post mile 35.3) and Hatfield Creek (post mile 37.2) are jurisdictional waters. One erosional feature located within the Biological Study Area at post mile 34.24 does not contain riparian vegetation. Aerial imagery suggests the feature may provide aquatic connectivity to at least two potential wetlands located on each side of the roadway; one is approximately 600 feet northwest of the roadway, and the other is approximately 875 feet southwest of the roadway. The latter is surrounded by residences and paved roads. No work is proposed within the bed or bank of either of the creeks or this erosional feature. The culvert replacements are not located at these features. Proposed work for repaving and metal beam guardrail replacement occurs on pavement or on the disturbed shoulders approaching the bridges over these creeks.

Special-Status Species

Special-status species is a broad term for sensitive plant and animal species, subspecies, varieties, distinct population segments, or evolutionary significant units regardless of their legal status (CDNNB 2024b, 2024c). The designation is based on federal, state, or local regulations; restricted ranges and numbers of occurrences within the state; and vulnerability to extirpations (CNDDDB 2024b, 2024c).

The potential for a special-status species to occur in the Biological Study Area is based on known or expected geographic range, presence of absence of suitable habitat, and degree of disturbance or development within the Biological Study Area and surrounding area. Effects determinations are based on site visits and supporting studies. A total of 90 special-status species could occur in the vicinity of the Biological Study Area based on the results of database queries. These species include 45 plants and 45 animals.

Special-status plants could be present in the Biological Study Area. However, most would be limited to areas where construction activities would not occur (coastal sage scrub, southern riparian scrub). Appropriate habitats and/or substrates are not present in the project footprint, or landcover is heavily disturbed or developed. One special-status plant species may be present in shoulder widening areas — Brewer's calandrinia (*Calandrinia breweri*). Brewer's calandrinia is considered rare due to its limited distribution (Calflora 2024, CNDDDB 2024c, CNPS 2024b). This herbaceous annual species grows in sandy or loamy soils within chaparral, sage scrub, disturbed sites, and burns. Brewer's calandrinia blooms in the springtime from March to June.

Several special-status animal species could also occur in the Biological Study Area due to the presence of appropriate habitat. However, construction activity could only affect the species listed in Table 2-5 due to the proposed area of disturbance and presence of suitable habitat.

Table 2-5: Special-Status Animal Species

Species	Scientific Name	Status ¹
Crotch's Bumblebee	<i>Bombus crotchii</i>	SCE
Western Spadefoot	<i>Spea hammondi</i>	FPT/SSC
Coronado Skink	<i>Plestiodon skiltonianus interparietalis</i>	WL
San Diegan Legless Lizard	<i>Anniella stebbinsi</i>	SSC
California Glossy Snake	<i>Arizona elegans occidentalis</i>	SSC
Two-striped Gartersnake	<i>Thamnophis hammondi</i>	SSC
Migratory Birds	Multiple	MBTA

¹ Note:

SCE – State candidate for listing as Endangered

FPT – Federally proposed for listing as Threatened

SSC - CA Dept. of Fish and Wildlife: California Species of Special Concern.

WL – CA Dept. of Fish and Wildlife: Watch List

SSC – CA Dept. of Fish and Wildlife: California Species of Special Concern.

MBTA – Migratory Bird Treaty Act

Sensitive Natural Communities

Sensitive Natural Communities are tracked in the California Natural Diversity Database due to the rarity of the community in the state or throughout its entire range (globally). Based on results of the database queries, two sensitive natural communities occur within the Biological Study Area: Diegan coastal sage scrub and southern riparian scrub.

Habitat Connectivity and Wildlife Passage

Surrounding landcover likely restricts or blocks connectivity between networks of natural landcover. Parcels developed for agriculture, commercial and industrial enterprises, and residential living have left natural habitat highly fragmented. Examples of existing wildlife barriers include fully developed parcels of land (e.g., downtown Ramona), pastureland, vineyards, roadways, and fencing. Existing culverts may provide crossings for small to medium-sized animals. Santa Maria and Hatfield Creeks may provide corridors for animals of all sizes, except at the bridge crossings within the Biological Study Area, where people have established encampments.

Environmental Consequences

Two sensitive natural communities are present within the Biological Study Area: Diegan coastal sage scrub and southern riparian scrub. No impacts would occur to either of these communities. Project impacts would be limited to disturbed habitat, urban/developed, and field/pasture land covers.

Approximately 0.48-acre of urban/developed landcover may be permanently impacted, and 0.35-acre may be temporarily impacted. Approximately 0.47-acre of disturbed habitat may be permanently impacted, and 1.61-acre may be temporarily impacted. Approximately 0.003-acre of field/pasture may be

temporarily impacted. Impacts to other landcover types and habitats are not anticipated. To avoid impacting Diegan coastal sage scrub and southern riparian scrub, the proposed project would implement avoidance measures, including identification of sensitive habitats as Environmentally Sensitive Areas on construction layout plans and maps and restricting access to Environmentally Sensitive Areas throughout the project. No equipment, work, material, debris, or personnel are allowed within the Environmentally Sensitive Areas. Therefore, there would be no impact to riparian habitat or other sensitive natural communities.

The proposed project would not create additional wildlife passage barriers or further impede movement of wildlife because proposed upgrades would not close gaps in existing infrastructure and would be limited to improvements to the existing roadway surface and other assets. Thus, the proposed project would have no impact on wildlife movement.

Once operational, the proposed project would not change ongoing use of the roadway or encroach into sensitive habitat, nor would it contribute new or additional impacts on special-status species. Moreover, the proposed project would minimize the chance of culvert and/or roadway failure, which could have beneficial effects by reducing unanticipated impacts to special-status plant species during severe storms and subsequent maintenance activities.

However, the proposed project could affect special-status plant and animal species during construction activities. These effects are described below by species type.

Special-Status Plants

As noted above in Section 2.1.4 – Affected Environment, no special-status plants were detected during site visits. One special-status plant species may be present in the proposed shoulder widening areas — Brewer's calandrinia (*Calandrinia breweri*). Brewer's calandrinia blooms in the springtime from March to June. If special-status plants were to occur in the footprint, individuals could be uprooted, crushed, or killed during ground disturbance or from foot traffic. Fugitive dust could cover plants, which may interfere with photosynthesis and gas exchange. Indirect impacts could occur if invasive species are not contained or removed from the site. The proposed project would implement avoidance measures including worker environmental awareness training, botanical surveys, Environmentally Sensitive Area fencing, restoration and weed control, and dust control to prevent substantial adverse effects to special-status plants from occurring. Thus, impacts to special-status plants would be less than significant.

Special-Status Animal Species

Six special-status animal species and various birds protected under the Migratory Bird Treaty Act could be affected by construction activities (see

Table 2-5 above). Specific avoidance and minimization measures are listed below.

Crotch's Bumblebee

Crotch's Bumblebee was not detected during site visits. However, suitable food plants were observed (*Helianthus annuus*, *Phacelia ramosissima*, *Solanum sp.*, *Vicia sp.*). Small mammal burrows observed during site visits may provide suitable locations for nests. Individual bumblebees are expected to avoid areas of active construction. However, if bumblebee nests were to occur in the project footprint, they could be crushed or entombed during ground disturbance or from foot traffic. To avoid impacting Crotch's bumblebees, the proposed project would implement avoidance measures including worker environmental awareness training; Crotch's bumblebee nest surveys using the most current methodologies developed by the California Department of Fish and Wildlife; Environmentally Sensitive Area fencing around any Crotch's bumblebee nests with a buffer; and wildlife monitoring during vegetation removal and grading activities. These measures would avoid the chance of substantial adverse effects to Crotch's Bumblebee. Existing habitat at the shoulder widening and guardrail upgrade locations is disturbed, so impacts would be less than significant. Therefore, compensatory mitigation is not proposed.

Western Spadefoot

Western Spadefoot database queries returned 60 records, including observations of road killed and live individuals located within the footprint. Friable soil and rodent burrows in disturbed habitat along the shoulders between post miles 33.11 and 35.32, post miles 37.04 and 37.18, and at guardrail upgrade locations adjacent to Santa Maria Creek and Hatfield Creek could provide suitable estivation or sheltering sites. In addition, individuals may disperse through the Biological Study Area while migrating to and from breeding and estivation sites. Culverts along the alignment may provide opportunities for individuals to safely cross under the roadway, including the culvert at post mile 34.24 which may connect two wetlands located outside of the Biological Study Area.

Mortality or harm could occur to individuals during installation of shoulder backing, trenching, or excavating post at guardrail upgrade locations. Operation of equipment or vehicles, and foot traffic over friable soil could collapse occupied burrows, potentially killing or harming individuals. In addition, vibration from operating equipment could collapse nearby burrows during shoulder backing and guardrail work.

Harassment could occur if capturing and relocating individuals is necessary. In addition, motion from equipment operation and foot traffic may agitate individuals during natural migrations, causing them to change directions.

Harassment from motion related disturbance and relocating may cause stress that could potentially reduce the fitness of individuals.

Effects from construction related noise and artificial illumination may be considered both direct and indirect, and temporary. Low frequency noise generated by equipment may cause individuals to stop estivating and emerge from burrows at inappropriate times.

Additional indirect effects may include insufficient restoration methods and inadequate weed control. Stormwater discharges could flush silt, sediment, or hazardous material (solvents, fuels, etc.) into breeding pools located outside of the Biological Study Area if erosion control devices are improperly installed or missing, thus decreasing water quality for the development of eggs and tadpoles if breeding pools outside of the Biological Study Area were present. The same scenario may occur if ground disturbed during construction is not properly stabilized after construction is completed.

The proposed project would implement avoidance and minimization measures to address potential effects on western spadefoot, including worker environmental awareness training; limitations on allowable work windows; wildlife exclusion fencing for work near Santa Maria and Hatfield Creeks; Environmentally Sensitive Area fencing around any spadefoot locations to avoid impacts; wildlife monitoring during vegetation removal and grading activities, and capture and relocation if necessary. These measures would avoid or minimize the chance of affecting western spadefoot. Compensatory mitigation is not proposed because existing habitat at shoulder widening and guardrail upgrade locations is disturbed. In addition, impacts to breeding habitat would be avoided. Therefore, impacts would be less than significant.

Reptile Species

Four special-status reptiles could be impacted by construction activities: Coronado skink, San Diegan legless lizard, California glossy snake, and two-striped gartersnake. One dead adult Coronado skink was found in the Biological Study Area under roadside debris. No other special-status reptile species were observed during site visits. California glossy snakes may occur in areas with friable soils and limited artificial illumination. San Diegan legless lizard could occur throughout the Biological Study Area except in highly developed landcover (e.g., downtown Ramona). The species is known to persist in fragmented habitat that contains soils suitable for burrowing. Project construction effects on special-status reptiles would generally be the same as those described above for western spadefoot. The proposed project would implement avoidance and minimization measures to address potential effects to special-status reptiles, including worker environmental awareness training and wildlife monitoring during vegetation removal and grading activities. Compensatory mitigation is not proposed because existing habitat at shoulder widening and guardrail locations is disturbed. Therefore, impacts would be less than significant.

Migratory Birds

Birds covered under the Migratory Bird Treaty Act and Fish and Game Code Section 3503 and Section 3800 may nest in or within line-of-sight of the Biological Study Area during construction. Several migratory birds capable of nesting in the Biological Study Area were observed during site visits. Nesting was not observed. However, site visits were mostly performed outside of the nesting season.

Excessive noise, visual movement, and artificial illumination all may inadvertently flush nesting birds or disrupt breeding. The proposed project would implement avoidance and minimization measures to address potential impacts to nesting and migratory birds, including nesting bird surveys during nesting season (February 15 to August 31). Compensatory mitigation is not proposed because no impacts would occur to nesting habitat. Therefore, impacts would be less than significant.

Wetlands and Waters

Santa Maria Creek and Hatfield Creek are jurisdictional waters; however, there will be no impacts within the bed and bank of these wetland habitats. All direct impacts are limited to the paved roadway and the shoulders approaching the bridges over these creeks. Indirect effects to jurisdictional waters could occur through stormwater runoff, erosion, spills, and/or sedimentation from project construction activities. However, with implementation of the proposed avoidance and minimization measures, which include water quality BMPs to minimize erosion and runoff, substantial adverse effects to wetlands and Waters of the United States and State would not occur. Therefore, the impact would be less than significant.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following measures to avoid or minimize impacts to biological resources:

- Environmental Awareness Training. The Resident Engineer (RE) would contact the Biologist before the initial preconstruction meeting and request mandatory training. All construction personnel would attend the training before construction begins. New personnel would attend a training session before they are allowed to enter the construction site. The construction contractor would provide translated materials as needed. All personnel would sign a form stating they completed the training. Caltrans would keep the forms on file and make them available to agencies upon request. At a minimum, training would include:
 - A description of special-status species that could occur in the Biological Study Area.

- A discussion of applicable agency regulations and consequences of noncompliance.
- Environmentally Sensitive Area Fencing. Locations with sensitive natural resources would be designated as Environmentally Sensitive Areas. Environmentally Sensitive Area delineation materials would include fencing, stakes and tape, or similar material. Delineators would be regularly maintained and remain in place until construction is completed. Environmentally Sensitive Area boundaries would be depicted on construction plans. Access to Environmentally Sensitive Areas would be prohibited.
- Botanical Surveys. Biologists would conduct focused Brewer's calandrinia surveys within the project footprint during the Spring 2025 blooming season. If Brewer's calandrinia are discovered, they would be mapped for avoidance, and the location(s) would be designated as an Environmentally Sensitive Area(s). If avoidance is not possible, seeds would be collected prior to construction and applied during restoration.
- Crotch's Bumblebee Surveys. Prior to Project activities, the Project proponent shall retain a qualified entomologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project-related ground-disturbing activities. Any Crotch's Bumblebee nests identified within or immediately adjacent to the work limits will be identified as an Environmentally Sensitive Area with a 100 foot buffer and no work shall occur while the nest is active or until CDFW is consulted and permits are obtained.
- Wildlife Construction Monitoring. A qualified biologist will monitor vegetation removal and grading activities within the construction footprint. If a special-status species is discovered, the biologist will halt work in the area until they determine that the animal has left on its own. If this is not feasible, a qualified biologist with appropriate handling permits such as a Scientific Collecting Permit will capture and relocate the animal to a suitable nearby habitat out of harm's way.
- Western Spadefoot. To avoid impacting western spadefoot:
 - A Biologist with experience in western spadefoot ecology and behavior would be present during all work that could affect western spadefoot.

- To the extent feasible, work at Santa Maria and Hatfield Creeks would only occur between December 1 and March 14.
- To the extent feasible, nighttime work would not occur in between Haverford Road and Olive Street, at Santa Maria Creek, or in between Earlham Street and Hatfield Creek. If nighttime work is necessary, the Biologist would conduct preconstruction clearance surveys of access roads, staging roads, and work sites within 500 feet of potentially suitable breeding habitat.
- Before construction begins, Wildlife Exclusion Fence (WEF) would be installed along the perimeter of Santa Maria and Hatfield Creeks and staging and storage areas to exclude western spadefoots. Fencing would consist of woven nylon netting approximately two feet in height and attached to wooden stakes. The bottom of the fence will be secured with gravel bags to prevent burrowing beneath the fence. All fencing materials would be maintained during construction and completely removed after construction is completed. The Biologist would conduct a minimum of 3-night surveys within the Wildlife Exclusion Fence. Surveys would continue until there have been 3 consecutive nights without a detection. Surveys would be conducted during appropriate weather conditions and time of day or night to maximize the likelihood of encountering western spadefoots. If Wildlife Exclusion Fence is damaged, gaps are present, or there is sign of western spadefoot, the Biologist would repeat surveys. Work in the areas would not occur until authorized by the Biologist.
- Stockpiles or spoils would be covered by the end of each work day and edges of covers would be sealed tightly with sandbags or other similar material in accordance with Caltrans Standard Specifications 13-4.03C(3).
- Equipment and personnel would use one single access point to staging and storage areas. Access points would be as narrow as possible and closed off by exclusionary fencing when personnel are not present in the areas.
- If at any time a western spadefoot is found, a biologist with a Scientific Collecting Permit would capture and relocate it to suitable habitat at least 200 feet from the work site.
- Contractors would control dust with water and not palliatives.
- Burrows. A Biologist would monitor grading activities in areas where burrows are present within the construction footprint. If a special-status species is discovered, the Biologist would capture and relocate it to suitable habitat at least 200 feet from the work site.

- **Entrapment.** To prevent entrapment of wildlife, all steep-walled holes, or trenches more than six inches deep would be securely covered at the close of each workday with plywood or similar materials, or crews would install escape ramps made of plywood or earthen material. Plywood would not exceed a 30-degree incline and have a non-slick surface to allow vertebrates to climb up the plank and out of the trench. Before holes or trenches are filled, they would be thoroughly inspected for trapped animals. Prior to arrival onsite, all open-ended pipes or similar structures would be completely sealed or capped and remained sealed or capped until they are completely installed. Erosion Control Devices would not include monofilament fibers.
- **Lighting.** Portable tower lights will have directional shields attached to them, and lights would only be directed downwards and towards active construction and staging areas, and away from Environmentally Sensitive Areas.
- **Pets.** To avoid harassment, personnel will not bring pets into the job site.
- **Nesting Bird Protection (February 15 to August 31).** The Biologist would conduct preconstruction nesting bird surveys no more than 72 hours prior to the start of construction activities. The Biologist would conduct subsequent surveys if work does not occur within 72 hours. If an active nest is discovered, the Biologist would establish an appropriately sized Environmentally Sensitive Area buffer based on species, nest location, sensitivity to disturbance, and/or the intensity or type of construction activities. Work would not occur in the Environmentally Sensitive Area until the nest is inactive and fledglings are independent of adults.
- **Water Quality Best Management Practices.** Construction crews would implement and maintain stormwater and erosion control Best Management Practices (BMPs) described in the Caltrans Construction Site (Best Management Practices) Manual (Caltrans 2017) and follow specifications in Section 13 of the Caltrans Standard Specifications and associated special provisions. At a minimum: protective measures would include:
 - Preventing pollutants generated by vehicle and equipment maintenance or cleaning from entering storm drains or aquatic resources
 - Servicing or storing vehicles and equipment no less than 100 feet from storm drains or aquatic resources unless the features are protected by impermeable barriers
 - Maintaining vehicles and equipment to prevent fluid leaks

- Storing hazardous materials such as fuels, oils, solvents, etc., in sealed containers at a designated location no less than 100 feet from storm drains or aquatic resources
- Capturing or controlling sediment with erosion control devices such as silt fence, fiber rolls, and appropriate erosion control netting, and covering temporary stockpiles
- **Restoration and Weed Control.** The contractor would contain and remove noxious weeds and associated plant material and obtain all permits, licenses, agreements, and certifications for proper disposal. After construction is complete, the contractor would return disturbed topographical contours to preconstruction grades and apply an erosion control seed mixture containing native species.
- **Trash Control.** Construction personnel would secure food and food-related trash items in sealed containers and removed the containers from the job site at the end of each day.

2.1.5 Cultural Resources

Considering the information compiled by Caltrans in the original Archaeological Survey Report (ASR) dated March 29, 2023, the First Supplemental Archaeological Survey Report dated September 15, 2023, and the Second Supplemental Archaeological Survey Report dated December 17, 2023, as well as the Historic Property Survey Report (HPSR) dated February 9, 2024, the following significance determinations have been made:

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

Discussion of Cultural Resources Evaluation

The proposed project’s Project Area Limits (PAL) were established in consultation with qualified Caltrans archaeologists and the Project Manager on January 31, 2024. The Project Area Limits are equivalent to the Area of Potential Effects (APE) assessed in the Historic Property Survey Report and Archaeological Survey Report. The Project Area Limits, which encompass

approximately 86 acres, were established to include the project's direct impact areas; potential indirect impact areas, if any; and the boundaries of the identified historic properties/historical resources. Due to the presence of a large cultural resource within the Project Area Limits, a Focused Project Area Limits area was also established to include only the project footprints. Although impact analysis was only conducted within the smaller Focused Project Area Limits, which encompass approximately 30 acres, the project's impacts were considered for the resource as a whole. A records search and archaeological surveys were conducted for this project using the Project Area Limits. The results of the records search indicated that a total of nine cultural resources have been previously identified with 32 cultural resource studies previously conducted in the records search area.

Background research and pedestrian archaeological surveys conducted for the proposed project identified one archaeological site and four built environment resources within the Focused Project Area Limits. The original archaeological survey report was prepared in March 2023 and was supplemented with two additional reports in September and December 2023 to account for minor project changes.

Historical Resources

As noted above, the records search completed for the project's Project Area Limits indicated the presence of nine cultural resources within a 300-foot buffer of State Route 78. Of these resources, only four built environment resources were determined to be present within Caltrans right-of-way. Two state-owned bridges are located within the project limits. Both Bridge #57-0093 and Bridge #57-0958 have been determined ineligible for the National Register of Historic Places (NRHP) as a result of Caltrans' Statewide Bridge inventory and evaluation efforts.

The Ramona Historic District (P-37-012268) is also recorded partially within the Caltrans right-of-way. This resource consists of various historic buildings and structures located in downtown Ramona. Although the district's boundaries overlap with the Caltrans right-of-way, none of the contributing elements, which are historic buildings, are located within Caltrans' right-of-way. State Route 78 and associated highway features are not part of the Historic District.

The northern end of the Ramona Main Street Tree Colonnade is within the project limits within the Caltrans right-of-way. This resource consists of a series of eucalyptus trees along State Route 67 and State Route 78 through downtown Ramona. The Ramona Main Street Tree Colonnade Historic District was listed in the National Register of Historic Places, and therefore automatically listed in the California Register of Historical Resources (CRHR), on October 5, 2018, and is a state-owned historical resource listed on the Master List of Historical Resources (Master List). This resource was found to meet Criterion A of the National Register of Historic Places for its contribution

to “community planning and development,” and includes the eucalyptus trees and their root systems. It serves as a visual gateway from a rural environment to a more urban environment. Spacing between trees is also considered a contributing element. Within the current project limits, a total of 14 contributing eucalyptus trees are present between 10th Street and 9th Street where the northern resource boundary terminus of the Ramona Main Street Tree Colonnade is located.

Archaeological Resources

No archaeological resources have been identified within Caltrans’ right-of-way in the project limits. One resource (CA-SDI-14265) was originally recorded partially within the Caltrans right-of-way. However, as a result of prior test excavations, it was determined that a portion of this resource within the Caltrans right-of-way would not contribute to the overall significance of the resource as a whole. In addition, no concern regarding the Native American heritage value was expressed on this portion of the resource by a Native American advisor who was consulted. Subsequently, the portion of this resource within the Caltrans right-of-way was excluded from the site boundary.

Refer to Section 2.1.18 for discussion on Tribal Cultural Resources.

As noted above, the project limits include the Ramona Historic District and the Ramona Main Street Tree Colonnade, which are historical resources for the purposes of CEQA.

The Ramona Historic District, which consists of various historic buildings and structures, is partially located within the project limits. However, none of the contributing elements are situated within the project’s impact area. As such, the proposed project will cause no impact to this resource.

As noted above, a total of 14 contributing eucalyptus trees in the Ramona Main Street Tree Colonnade Historic District are present within the project limits. The proposed project would not impact the eucalyptus trees and their root systems due to the pavement rehabilitation method proposed, which would be limited to the pavement surface. A representative from the Ramona Tree Trust, a local private preservation advocate organization, was consulted on the project; during phone and email correspondence in January 2023, no concern or comment was expressed regarding the proposed project. Nonetheless, the 14 contributing eucalyptus trees within the project limits will be placed within an Environmentally Sensitive Area as a precautionary measure and impacts to these trees would be avoided during construction of this project. A project-specific Environmentally Sensitive Areas Action Plan was prepared by Caltrans, dated January 31, 2024. The Action Plan will be adhered to as part of project conditions. Implementation of Environmentally Sensitive Areas is a standard practice pursuant to Section 14 of Caltrans Standard Specifications. Therefore, the proposed project would have no impact on historical resources.

Based on the previous records search results and intensive pedestrian field surveys, there are no known archaeological resources within the project limits. Therefore, there would be no impact on archaeological resources.

Avoidance, Minimization, and/or Mitigation Measures

As a precautionary measure, Caltrans would implement the Environmentally Sensitive Area Action Plan developed for the proposed project, in accordance with Section 106 PA Stipulation VIII.C.3 and Section 14 of Caltrans Standard Specifications. No project-related activities would take place within the Environmentally Sensitive Area.

If buried cultural materials are encountered during construction, it is Caltrans’ policy that work stop in that area until a qualified archaeologist can evaluate the nature and significance of the find. Additional survey will be required if the project changes to include areas not previously surveyed.

2.1.6 Energy

Question—Would the project:	CEQA Significance Determinations for Energy
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No Impact

Discussion of Energy Evaluation

The proposed project is not a capacity-increasing project; therefore, a qualitative analysis was performed for this section. Construction of the proposed project would result in short-term direct energy consumption due to the manufacture of construction materials, the use of heavy-duty construction equipment requiring petroleum fuels, and construction workers’ motor vehicles as they travel to and from the site. Construction-related energy consumption for the proposed project would be temporary and would not result in excessive energy consumption by adhering to Caltrans Standard Specifications, which include requirements to consider environmentally friendly treatments and use materials with recycled content to the extent feasible. Additionally, idling of construction equipment would be limited to 5 minutes or less for delivery trucks and other diesel-powered equipment, which would reduce wasteful use of fuel. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction, and there would be no impact.

Once operational, the proposed project would result in negligible changes in energy consumption along the State Route 78 corridor. The proposed project would replace or improve existing elements along the roadway, including pavement, culverts, guardrails, shoulders, crosswalks, traffic management systems, and signage. These features, as operational and safety improvements to the roadway, would not induce additional vehicle travel or otherwise consume excessive or unnecessary amounts of energy. Pavement rehabilitation would result in smoother pavement surfaces and reduce pavement-tire friction, thereby increasing the fuel economy of vehicles on the roadway. Also, the proposed project would reduce indirect energy consumption due to ongoing repairs and maintenance of roadway features. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation, and there would be no impact.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measures to minimize project energy effects:

- The construction contractor shall utilize alternative fuels such as renewable diesel for construction equipment when feasible.
- The construction contractor shall reduce construction waste.
- The contractor shall encourage improved fuel efficiency from construction equipment through ensuring that construction equipment is maintained and properly tuned and equipment has been correctly sized for the job.

2.1.7 Geology and Soils

Question—Would the project:	CEQA Significance Determinations for Geology and Soils
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 	No Impact
ii) Strong seismic ground shaking?	No Impact
iii) Seismic-related ground failure, including liquefaction?	No Impact

Question—Would the project:	CEQA Significance Determinations for Geology and Soils
iv) Landslides?	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No Impact

Discussion of Geology and Soils Evaluation

The proposed project is not located within an Alquist-Priolo Fault Zone, and adverse effects related to earthquake fault rupture are unlikely. The proposed project would be constructed to meet Caltrans' Seismic Design Criteria, which would minimize potential risks related to seismic ground shaking and other seismic hazards. The proposed project would occur within Caltrans right-of-way along flat terrain and would not affect any geologically unstable units or increase landslide hazards. Temporary effects due to soil erosion would be addressed by compliance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The proposed project would make improvements to existing Caltrans facilities without changing their overall function and is not likely to exacerbate any existing hazardous soil conditions. Further, site-specific soil conditions would be evaluated during the design phase in the project Geotechnical Report, which would provide recommendations to address any soil, liquefaction, or seismic issues. Therefore, no impacts would occur due to seismic or soil hazards.

The project area is within a low paleontological sensitive zone as mapped by the County of San Diego (County of San Diego 2011b). As a result, project construction activities would have no impact on paleontological resources.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measures to avoid or minimize impacts to geology and soils:

- Construction crews would implement and maintain stormwater and erosion control Best Management Practices described in the Caltrans Construction Site (Best Management Practices) Manual (Caltrans 2017) and follow specifications in Section 13 of the Caltrans Standard Specifications and associated special provisions. At a minimum, protective measures would include:
 - Preventing pollutants generated by vehicle and equipment maintenance or cleaning from entering storm drains or aquatic resources.
 - Servicing or storing vehicles and equipment no less than 50 feet from storm drains or aquatic resources unless the features are protected by impermeable barriers.
 - Maintaining vehicles and equipment to prevent fluid leaks.
 - Storing hazardous materials such as fuels, oils, solvents, etc., in sealed containers at a designated location no less than 50 feet from storm drains or aquatic resources.
 - Capturing or controlling sediment with erosion control devices such as silt fence, fiber rolls, and appropriate erosion control netting, and covering temporary stockpiles.

2.1.8 Greenhouse Gas Emissions

Considering the information in the Climate Change and Greenhouse Gas Study dated April 2024, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Greenhouse Gas Emissions
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No Impact

Regulatory Framework

California has been innovative and proactive in addressing greenhouse gas emissions and climate change by passing multiple Senate Bills, Assembly Bills, and executive orders including, but not limited to, those described below.

Executive Order S-3-05 (June 1, 2005): The goal of this order is to reduce California's greenhouse gas emissions to (1) year 2000 levels by 2010, (2) year 1990 levels by 2020, and (3) 80 percent below year 1990 levels by 2050. This goal was further reinforced with the passage of Assembly Bill 32 in 2006 and Senate Bill 32 in 2016.

Assembly Bill 32, Chapter 488, 2006, Núñez and Pavley, The Global Warming Solutions Act of 2006: Assembly Bill 32 codified the 2020 greenhouse gas emissions reduction goals outlined in Executive Order S-3-05, while further mandating that Air Resources Board create a scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases." Although Assembly Bill 32 established a statewide greenhouse gas emissions limit to be achieved by 2020, the Legislature also intended that the statewide greenhouse gas emissions limit continue in existence and be used to maintain and continue reductions in emissions of greenhouse gases beyond 2020 (Health and Safety Code Section 38551(b)). The law requires Air Resources Board to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective greenhouse gas reductions.

Executive Order S-01-07 (January 18, 2007): This order sets forth the low carbon fuel standard (LCFS) for California. Under this order, the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by the year 2020. The Air Resources Board readopted the low carbon fuel standard regulation in September 2015, and the changes went into effect on January 1, 2016. The program establishes a strong framework to promote the low-carbon fuel adoption necessary to achieve the Governor's 2030 and 2050 greenhouse gas reduction goals.

Senate Bill 375, Chapter 728, 2008, Sustainable Communities and Climate Protection: This bill requires the Air Resources Board to set regional emissions reduction targets for passenger vehicles. The Metropolitan Planning Organization (MPO) for each region must then develop a "Sustainable Communities Strategy" that integrates transportation, land-use, and housing policies to plan how it would achieve the emissions target for its region.

Senate Bill 391, Chapter 585, 2009, California Transportation Plan: This bill requires California's long-range transportation plan to identify strategies to address California's climate change goals under Assembly Bill 32.

Executive Order B-16-12 (March 2012) orders state entities under the direction of the Governor, including Air Resources Board, the California

Energy Commission, and the Public Utilities Commission, to support the rapid commercialization of zero-emission vehicles. It directs these entities to achieve various benchmarks related to zero-emission vehicles.

Executive Order B-30-15 (April 2015) establishes an interim statewide greenhouse gas emission reduction target of 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. It further orders all state agencies with jurisdiction over sources of greenhouse gas emissions to implement measures, pursuant to statutory authority, to achieve reductions of greenhouse gas emissions to meet the 2030 and 2050 greenhouse gas emissions reductions targets. It also directs the Air Resources Board to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent (MMTCO_{2e}). (Greenhouse gases differ in how much heat each traps in the atmosphere [global warming potential, or GWP]. Carbon dioxide (CO₂) is the most important greenhouse gas, so amounts of other gases are expressed relative to CO₂, using a metric called “carbon dioxide equivalent” (CO_{2e}). The global warming potential of CO₂ is assigned a value of 1, and the global warming potential of other gases is assessed as multiples of CO₂.) Finally, it requires the Natural Resources Agency to update the state’s climate adaptation strategy, *Safeguarding California*, every 3 years, and to ensure that its provisions are fully implemented.

Senate Bill 32, Chapter 249, 2016, codifies the greenhouse gas reduction targets established in Executive Order B-30-15 to achieve a mid-range goal of 40 percent below 1990 levels by 2030.

Senate Bill 1386, Chapter 545, 2016, declared “it to be the policy of the state that the protection and management of natural and working lands...is an important strategy in meeting the state’s greenhouse gas reduction goals, and would require all state agencies, departments, boards, and commissions to consider this policy when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria relating to the protection and management of natural and working lands.”

Assembly Bill 134, Chapter 254, 2017, allocates Greenhouse Gas Reduction Funds and other sources to various clean vehicle programs, demonstration/pilot projects, clean vehicle rebates and projects, and other emissions-reduction programs statewide.

Senate Bill 743, Chapter 386 (September 2013): This bill changes the metric of consideration for transportation impacts pursuant to CEQA from a focus on automobile delay to alternative methods focused on vehicle miles traveled, to promote the state’s goals of reducing greenhouse gas emissions and traffic-related air pollution and promoting multimodal transportation while balancing the needs of congestion management and safety.

Senate Bill 150, Chapter 150, 2017, Regional Transportation Plans: This bill requires the Air Resources Board to prepare a report that assesses progress made by each metropolitan planning organization in meeting their established regional greenhouse gas emission reduction targets.

Executive Order B-55-18 (September 2018) sets a new statewide goal to achieve and maintain carbon neutrality no later than 2045. This goal is in addition to existing statewide targets of reducing greenhouse gas emissions.

Executive Order N-19-19 (September 2019) advances California's climate goals in part by directing the California State Transportation Agency to leverage annual transportation spending to reverse the trend of increased fuel consumption and reduce greenhouse gas emissions from the transportation sector. It orders a focus on transportation investments near housing, managing congestion, and encouraging alternatives to driving. This order also directs the Air Resources Board to encourage automakers to produce more clean vehicles, formulate ways to help Californians purchase them, and propose strategies to increase demand for zero-emission vehicles.

Assembly Bill 1279 (September 2022) codifies Executive Order B-55-18, establishing the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045 and maintain net negative greenhouse gas emissions thereafter. Assembly Bill 1279 also requires the California Air Resources Board to ensure that statewide anthropogenic greenhouse gas emissions are reduced to at least 85 percent below 1990 levels by 2045.

Affected Environment

The Air Resources Board collects greenhouse gas emissions data for transportation, electricity, commercial/residential, industrial, agricultural, and waste management sectors each year. It then summarizes and highlights major annual changes and trends to demonstrate the state's progress in meeting its greenhouse gas reduction goals. The 2023 edition of the greenhouse gas emissions inventory found that California emissions totaled 381.3 MMTCO_{2e} in 2021 (the most recent year for which published data is available), with the transportation sector responsible for 39 percent of total greenhouse gases. It also found that overall statewide greenhouse gas emissions show a declining trend from 2000 to 2021 despite growth in population and state economic output (ARB 2023). Emissions from greenhouse gas-emitting activities in 2021 were 3.4 percent higher than 2020, largely due to an increase in transportation sector emissions from passenger vehicles whose activity and emissions rebounded after COVID-19 (ARB 2023).

Greenhouse gas emissions from transportation projects can be divided into those produced during operation of the State Highway System and those produced during construction. The primary greenhouse gases produced by the transportation sector are CO₂, methane (CH₄), nitrous oxide (N₂O), and hydrofluorocarbons (HFCs). CO₂ emissions are a product of the combustion of

petroleum-based products, like gasoline, in internal combustion engines. Relatively small amounts of CH₄ and N₂O are emitted during fuel combustion. In addition, a small amount of hydrofluorocarbons emissions is attributable to the transportation sector.

The CEQA Guidelines generally address greenhouse gas emissions as a cumulative impact due to the global nature of climate change (Public Resources Code Section 21083(b)(2)). As the California Supreme Court explained, “because of the global scale of climate change, any one project’s contribution is unlikely to be significant by itself.” (Cleveland National Forest Foundation versus San Diego Association of Governments (2017) 3 California 5th 497, 512.) In assessing cumulative impacts, it must be determined if a project’s incremental effect is “cumulatively considerable” (CEQA Guidelines Sections 15064(h)(1) and 15130).

The proposed project is in a rural/semi-urban area of San Diego County in the community of Ramona. The primary land uses in the area include rural residential, retail, service commercial, and open space. Greenhouse gas emissions in the project area are mainly generated through fuel consumption along the highway and regional/local roads. In 2021, State Route 78 had annual average daily traffic (AADT) ranging from approximately 8,000 to 20,000 vehicle trips within the general project limits (Caltrans 2021). Energy use for building electricity, heating, and cooling also contributes to the regional greenhouse gas emissions portfolio. A Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by the San Diego Association of Governments guides transportation and land use development in the proposed project area to target greenhouse gas reductions.

Environmental Consequences

The proposed project would generate greenhouse gas emissions during construction due to material processing and transportation, construction equipment, and traffic delays. These emissions would be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through details in plans and specifications and by implementing better traffic management during construction phases. Temporary construction emissions would be reduced with Best Management Practices and Caltrans Standard Specifications, which are described further below under Avoidance, Minimization, and Mitigation Measures.

Greenhouse gas emissions associated with construction activities were estimated using the Caltrans Construction Emissions Tool (CAL-CET version 2021v1.0.2). Table 2-6 shows the anticipated construction-related greenhouse gas emissions for the proposed project. Construction of the project would generate approximately 382 metric tons of CO₂e, after accounting for the global warming potential of each greenhouse gas.

Table 2-6: Total Construction-Related Greenhouse Gas Emissions

Greenhouse Gas	Total Emissions (tons)
CO ₂	339
CH ₄	0.005
N ₂ O	0.02
BC	0.008
HFC	0.014
Total CO₂e (Metric Tons)	368

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; N₂O = nitrous oxide; CH₄ = methane; BC = black carbon; HFC = hydrofluorocarbons. Global warming potential values are assumed N₂O is 298, CH₄ is 25, BC is 460, HFC is 1,430.
Source: Caltrans 2024c.

As standard practice for all projects, Caltrans incorporates required measures that limit greenhouse gas emissions during construction to the extent feasible. With implementation of these measures (listed below) as part of the project, project construction would be completed efficiently with minimal energy and material waste, and in alignment with a Traffic Management Plan to minimize excess fuel consumption during temporary lane closures. Therefore, project construction would not generate substantial greenhouse gas emissions that would have a significant impact on the environment, and the impact would be less than significant.

Once operational, the proposed project would not have a measurable effect on regional greenhouse gas emissions. The project would replace or rehabilitate existing transportation facilities without an increase in vehicle capacity or induced travel and operational emissions would remain similar to existing conditions. Therefore, operation of the proposed project would not generate greenhouse gas emissions that would have a significant impact on the environment.

Avoidance, Minimization, and/or Mitigation Measures

All construction contracts include Caltrans Standard Specifications to reduce temporary greenhouse gas emissions. Sections 7-1.02A and 7-1.02C, Emissions Reduction, require contractors to comply with all laws applicable to the project and to certify they are aware of and will comply with all Air Resources Board emission reduction regulations. Section 14-9.02, Air Pollution Control, requires contractors to comply with all air pollution control rules, regulations, ordinances, and statutes. Additional standard measures that would contribute to project-level greenhouse gas emissions reductions include the following:

- The construction contractor shall utilize alternative fuels such as renewable diesel-fueled or solar-powered construction equipment, as feasible.
- The construction contractor shall implement an idling limit of 5 minutes or less for delivery trucks and other diesel-powered equipment (with some exceptions).
- The construction contractor shall schedule truck trips outside of peak morning and evening commute hours and implement a Traffic Management Plan to minimize effects to traffic.
- The construction contractor shall reduce construction waste and maximize the use of recycled materials including project features as applicable (such as salvaging rebar from demolished concrete and process waste).
- The construction contractor shall maximize improved fuel efficiency of construction equipment through ensuring that construction equipment is maintained and properly tuned, and equipment has been sized correctly for the job.
- The construction contractor shall provide construction personnel with the knowledge to identify environmental issues and Best Management Practices to minimize impacts to the human and natural environment. Supplement existing training with information regarding methods to reduce greenhouse gas emissions related to construction.
- The construction contractor shall use recycled water or reduce consumption of potable water for construction.
- The construction contractor shall reduce the need for transport of earthen materials by balancing cut and fill quantities.
- The construction contractor shall salvage large removed trees for lumber or similar on-site beneficial uses other than standard wood-chipping.
- The construction contractor shall select long-life, permeable pavement materials that lower the rolling resistance of highway surfaces as much as possible while still maintaining design and safety standards.
- The construction contractor shall use cold in-place recycling for pavement rehabilitation, as feasible.
- The construction contractor shall replace lighting with ultra-reflective sign materials that are illuminated by headlights to reduce energy used by electric lighting.

2.1.9 Hazards and Hazardous Materials

Considering the information in the hazardous waste memorandum prepared by Caltrans dated March 15, 2024, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Hazards and Hazardous Materials
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant Impact

Regulatory Setting

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

California regulates hazardous materials, waste, and substances under the authority of the California Health and Safety Code and is also authorized by the federal government to implement the Resource Conservation and Recovery Act in the state. 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 (Porter-Cologne Act) also restricts disposal of wastes and requires cleanup of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and cleanup of contamination include Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, Title 23 Waters, and Title 27 Environmental Protection.

Worker and public health and safety are key issues when addressing hazardous materials that may affect human health and the environment. Proper management and disposal of hazardous material are vital if hazardous materials are found, disturbed, or generated during project construction.

Affected Environment

Caltrans Environmental Engineering staff reviewed the Department of Toxic Substances Control's EnviroStor and State Water Resources Control Board's GeoTracker databases for onsite and nearby hazardous waste/unauthorized release facilities that may have impacted the environmental condition of the project area (Caltrans 2024b). Identified facilities adjacent to the proposed project are listed as "Completed – Case Closed." As such, there is a low likelihood for the listed facilities to have impacted the environmental condition of the project area.

Soil screening and statistical analysis for aerially deposited lead (ADL) was performed in September 2022. Based on the statistical analysis results, the proposed project would be considered unregulated for aerially deposited lead. Existing wooden posts are present in the project limits; removal would generate treated wood waste (TWW). Treated wood waste products contain hazardous chemical preservatives and is considered hazardous waste. The proposed project also would include cold planing of paved surfaces, including roadway surfaces with thermoplastic striping or other pavement marking. Paint and thermoplastics may include residue containing lead or other hazardous waste residue.

Environmental Consequences

The primary potential hazards to the public or environment related to transport, use, or disposal of hazardous materials would occur during construction of the proposed project. Construction activities would be focused within the Caltrans right-of-way on State Route 78, mostly involving the use of concrete and other hardscape materials. Typical hazardous materials used during construction (e.g., solvents, paints, and fuels) would be managed in accordance with Caltrans' standard measures and other regulatory requirements and are not anticipated to compromise workers' health and safety.

However, soil disturbance would be required for the proposed project, which may unearth previously undiscovered hazardous materials. Caltrans Standard Specifications (listed below) would regulate the handling of hazardous materials encountered on-site and minimize risks. With adherence to these standard practices, the proposed project would not create a significant hazard due to routine transport, use, or disposal of hazardous materials. Therefore, the impact would be less than significant.

Any hazardous materials determined to be present during construction would require special handling, reuse, and disposal because of their potential to harm human health and the environment. To avoid adverse environmental effects related to the accidental release of these toxins into the environment during construction, a Debris Containment and Collection Plan would be required for proper containment during disturbance activities. Additionally, based on the statistical analysis for aerially deposited lead, a lead compliance plan would be prepared in compliance with Caltrans Standard Specifications 7-1.02K(6)(j)(ii).

The proposed project would generate treated wood waste for activities involving removal of existing wooden posts from either guardrail or signs. As such, the proposed project would implement Caltrans Standard Special Provision (SSP) 14-11.14 Treated Wood Waste to manage the handling and disposal of this hazardous waste in accordance with standard practices.

The proposed project would remove traffic striping and pavement parking which may contain lead during pavement rehabilitation (cold planing). If traffic striping and/or pavement markings will not be removed prior to cold planing, Standard Special Provision 36-4 Residue Containing Lead from Paint and Thermoplastics would be required. If yellow striping paint, yellow thermoplastic traffic stripe, or yellow pavement markings will be removed from paved surfaces prior to and separately from cold planing, Standard Special Provision 14-11.12 Removal of Yellow Traffic Stripe and Pavement Marking with Hazardous Waste Residue would be required. Also, if removal of any traffic striping or pavement markings other than yellow is performed prior to and separately from cold planing, Standard Special Provision 84-9.03B Remove Traffic Stripes and Pavement Markings Containing Lead would be required.

Per standard Caltrans construction protocols, staging areas for construction equipment and materials would be within specifically designated areas within the Caltrans right-of-way or immediately adjacent properties (if determined necessary due to safety or site constraints). A spill prevention plan would be implemented to reduce risk of accidental spills of fuels, solvents, or other regularly used hazardous materials during construction activities. Soil stockpiles would not be permitted to contain hazardous materials or be located in Environmentally Sensitive Areas, in accordance with Caltrans Standard Specifications 14-11.05. With adherence to applicable state and federal regulations, permit conditions, and Caltrans Standard Special Provisions and Non Standard Special Provisions, the proposed project would not create a significant hazard through upset and accident conditions involving release of hazardous materials into the environment. Therefore, the impact would be less than significant.

The proposed project would be located within 0.25 mile of existing schools, including Ramona Elementary School (approximately 0.09 mile southeast of Main Street) and Montecito High School (approximately 0.3 mile southeast of Main Street). The proposed project would be located within the State Route 78 right-of-way or immediately adjacent parcels and would not infringe on either of these schools' boundaries. As mentioned above, Caltrans' provisions related to hazardous materials, along with applicable state and federal regulatory requirements, would be adhered to by the project to ensure hazardous materials are properly contained during construction activities. Therefore, potential impacts from emitting or handling hazardous materials within 0.25 mile of existing schools would be less than significant.

During construction, road closures would occur that may conflict with County of San Diego evacuation plans. The proposed project would implement a Traffic Management Plan for the construction phase that details temporary lane closures, duration of closures, alternate access routes, changes to traffic circulation, and construction sequencing. The Traffic Management Plan would be provided to local emergency responders in advance of construction. This would allow project construction to be accounted for in emergency response planning and minimize conflicts with County of San Diego evacuation plans (County of San Diego 2022b). Once operational, the proposed project would improve efficiency and safety on State Route 78 and would have no effect on emergency response. Therefore, the proposed project operations would not conflict with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

As discussed further in Section 2.1.20 – Wildfire, the proposed project is in a California Department of Forestry and Fire Protection (CAL FIRE) Very High Fire Hazard Severity Zone. The project would adhere to Caltrans Standard Specifications 7-1.02M(2) to manage fire risk during construction, which requires preparation of a fire prevention plan. Once operational, the proposed project would not introduce new uses or develop facilities that could increase

exposure of people or structures to wildland fires. Therefore, impacts would be less than significant.

Avoidance, Minimization, and/or Mitigation Measures

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

- A Lead Compliance Plan under Caltrans Standard Specifications 7-1.02K(6)(j)(ii) would be required during construction when handling lead-contaminated soils, as well as removal of lead-based paint, thermoplastic, painted traffic stripe, and/or pavement marking.
- Caltrans is designated as the generator of hazardous waste produced from work activities per Caltrans Standard Specifications 14-11.07.
- Caltrans will follow all requirements for aerially deposited lead treatment and disposal pursuant to Caltrans Standard Special Provision 7-1.02K(6)(j)(iii).
- For hazardous waste generated on the job site, the Water Pollution Control manager must be knowledgeable of proper handling and emergency procedures for hazardous waste as demonstrated by submitting a training certificate, which indicates completion of training required under 22 California Code of Regulations Section 66265.16, per Caltrans Standard Specifications 14-11.01.
- The construction contractor, upon discovery of unanticipated asbestos and/or hazardous substance, is required to immediately stop working in the area of discovery and notify Caltrans Environmental Engineering per Caltrans Standard Specification 14-11.02. Environmental Engineering will use the on-call Construction Emergency Response Contract to perform any required work for the proposed project.
- The construction contractor is required, per Caltrans Standard Specifications 14-11.03, to handle, store, and dispose of hazardous waste under 22 California Code of Regulations Div. 4.5.
- Excavation, transportation, and handling of material containing hazardous waste or contamination must result in no visible dust migration. When clearing, grubbing, and performing earthwork operations in areas containing hazardous waste or contamination, a water truck or water tank must be provided on the job site per Caltrans Standard Specifications 14-11.04.
- The construction contractor is not permitted to stockpile material containing hazardous waste or contamination unless ordered by Caltrans or a regulatory agency. Stockpiles containing hazardous waste or

contamination must not be placed where affected by surface run-on or run-off. Stockpiles are not permitted in Environmentally Sensitive Areas. Stockpiled material must not enter storm drains, inlets, or Waters of the State. These requirements are provided in Caltrans Standard Specifications 14-11.05.

- The construction contractor is designated the generator of hazardous waste produced from materials the construction contractor has brought to the job site per Caltrans Standard Specifications 14-11.06.
- Removal of any treated wood waste (e.g., wooden posts for guardrails, signs, barriers, or piles) would require proper handling and disposal per Caltrans Standard Special Provision 14-11.14. Treated wood waste products contain hazardous chemical preservatives; therefore, treated wood waste is considered a California Hazardous Waste.
- Imported local materials from a (1) noncommercial source or (2) source not regulated under California jurisdiction must be evaluated and approved for use by Environmental Engineering Branch per Caltrans Standard Specifications 6 1.03B.

2.1.10 Hydrology and Water Quality

Question—Would the project:	CEQA Significance Determinations for Hydrology and Water Quality
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?	Less Than Significant Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation onsite or offsite;	No Impact

Question—Would the project:	CEQA Significance Determinations for Hydrology and Water Quality
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite;	No Impact
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	No Impact
(iv) impede or redirect flood flows?	Less Than Significant Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No Impact

Regulatory Setting

Federal

Clean Water Act

In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the Waters of the United States from any point source unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System permit. This act and its amendments are known today as the Clean Water Act. Congress has amended the act several times. In the 1987 amendments, Congress directed dischargers of stormwater from municipal and industrial/construction point sources to comply with the National Pollutant Discharge Elimination System permit scheme. The following are relevant Clean Water Act sections:

- Sections 303 and 304 require states to issue water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to Waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the act. This is most frequently required in tandem with a Section 404 permit request (see below).
- Section 402 establishes the National Pollutant Discharge Elimination System, a permitting system for the discharges (except for dredge or fill

material) of any pollutant into Waters of the United States. Regional Water Quality Control Boards administer this permitting program in California. Section 402(p) requires permits for discharges of stormwater from industrial/construction and municipal separate storm sewer systems (MS4s).

- Section 404 establishes a permit program for the discharge of dredge or fill material into Waters of the United States. This permit program is administered by the U.S. Army Corps of Engineers.

The goal of the Clean Water Act is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”

The U.S. Army Corps of Engineers issues two types of 404 permits: General and Individual. There are two types of General permits: Regional and Nationwide. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Ordinarily, projects that do not meet the criteria for a Regional or Nationwide Permit may be permitted under one of the U.S. Army Corps of Engineers’ Individual permits. There are two types of Individual permits: Standard permits and Letters of Permission. For Individual permits, the U.S. Army Corps of Engineers decision to approve is based on compliance with the U.S. Environmental Protection Agency’s Section 404 (b)(1) Guidelines (40 Code of Federal Regulations Part 230), and whether the permit approval is in the public interest. The Section 404(b)(1) Guidelines (guidelines) were developed by the U.S. Environmental Protection Agency in conjunction with the U.S. Army Corps of Engineers, and allow the discharge of dredged or fill material into the aquatic system (Waters of the United States) only if there is no practicable alternative that would have less adverse effects. The guidelines state that the U.S. Army Corps of Engineers may not issue a permit if there is a least environmentally damaging practicable alternative to the proposed discharge that would have lesser effects on Waters of the United States and not have any other significant adverse environmental consequences. According to the guidelines, documentation is needed that a sequence of avoidance, minimization, and compensation measures has been followed, in that order. The guidelines also restrict permitting activities that violate water quality or toxic effluent standards, jeopardize the continued existence of listed species, violate marine sanctuary protections, or cause “significant degradation” to Waters of the United States. In addition, every permit from the U.S. Army Corps of Engineers, even if not subject to the Section 404(b)(1) Guidelines, must meet general requirements. See 33 Code of Federal Regulations 320.4.

Executive Order 11988 (Floodplain Management)

Executive Order 11988 (Floodplain Management) directs all federal agencies to refrain from conducting, supporting, or allowing actions in floodplains unless it is the only practicable alternative. Federal Highway Administration requirements for compliance are outlined in 23 Code of Federal Regulations 650 Subpart A.

To comply, the following must be analyzed:

- The practicability of alternatives to any longitudinal encroachments.
- Risks of the action.
- Impacts on natural and beneficial floodplain values.
- Support of incompatible floodplain development.
- Measures to minimize floodplain impacts and to preserve/restore any beneficial floodplain values affected by the project.

The base floodplain is defined as “the area subject to flood or tide having a one percent chance of being exceeded in any given year.” An encroachment is defined as “an action within the limits of the base floodplain.”

State

Porter-Cologne Water Quality Control Act

California’s Porter-Cologne Act, enacted in 1969, provides 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 Clean Water Act and regulates discharges to State include more than just Waters of the United States, like groundwater and surface waters not considered Waters of the United States. Additionally, it prohibits discharges of “waste” as defined, and this definition is broader than the Clean Water Act 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 Clean Water Act.

The State Water Resources Control Board and Regional Water Quality Control Boards are responsible for establishing the water quality standards (objectives and beneficial uses) required by the Clean Water Act and regulating discharges to ensure compliance with the water quality standards. Details about water quality standards in a project area are included in the applicable Regional Water Quality Control Board Basin Plan. In California, Regional Water Quality Control Boards designate beneficial uses for all water body segments in their jurisdictions and then set criteria necessary to protect

those uses. As a result, the water quality standards developed for particular water segments are based on the designated use and vary depending on that use. In addition, the State Water Resources Control Board identifies waters failing to meet standards for specific pollutants. These waters are then state-listed in accordance with Clean Water Act Section 303(d). If a state determines that waters are impaired for one or more constituents and the standards cannot be met through point source or non-point source controls (National Pollutant Discharge Elimination System permits or Waste Discharge Requirements), the Clean Water Act requires the establishment of Total Maximum Daily Loads (TMDLs). Total Maximum Daily Loads specify allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed.

State Water Resources Control Board and Regional Water Quality Control Boards

The State Water Resources Control Board administers water rights, sets water pollution control policy, and issues water board orders on matters of statewide application, and oversees water quality functions throughout the state by approving Basin Plans, Total Maximum Daily Loads, and National Pollutant Discharge Elimination System permits. Regional Water Quality Control Boards are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

National Pollutant Discharge Elimination System Program

Municipal Separate Storm Sewer Systems

Section 402(p) of the Clean Water Act requires the issuance of National Pollutant Discharge Elimination System permits for five categories of stormwater discharges, including MS4s (municipal separate storm sewer systems). An MS4 is defined as “any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over stormwater, that is designed or used for collecting or conveying stormwater.” The State Water Resources Control Board has identified Caltrans as an owner/operator of an MS4 under federal regulations. Caltrans’ MS4 permit covers all Caltrans rights-of-way, properties, facilities, and activities in the state. The State Water Resources Control Board or the Regional Water Quality Control Board issues National Pollutant Discharge Elimination System permits for 5 years, and permit requirements remain active until a new permit has been adopted.

Caltrans’ MS4 Permit, Order No. 2012-0011-DWQ (adopted on September 19, 2012, and effective on July 1, 2013), as amended by Order No. 2014-0006-EXEC (effective January 17, 2014), Order No. 2014-0077-DWQ

(effective May 20, 2014), and Order No. 2015-0036-EXEC (conformed and effective April 7, 2015) has three basic requirements:

1. Caltrans must comply with the requirements of the Construction General Permit (see below under Construction General Permit);
2. Caltrans must implement a year-round program in all parts of the State to effectively control stormwater and non-stormwater discharges; and
3. Caltrans' stormwater discharges must meet water quality standards through implementation of permanent and temporary (construction) Best Management Practices to the maximum extent practicable, and other measures as the State Water Resources Control Board determines to be necessary to meet the water quality standards.

To comply with the permit, Caltrans developed the Statewide Storm Water Management Plan (SWMP) to address stormwater pollution controls related to highway planning, design, construction, and maintenance activities throughout California. The Statewide Storm Water Management Plan assigns responsibilities within Caltrans for implementing stormwater management procedures and practices as well as training, public education and participation, monitoring and research, program evaluation, and reporting activities. The Statewide Storm Water Management Plan describes the minimum procedures and practices Caltrans uses to reduce pollutants in stormwater and non-stormwater discharges. It outlines procedures and responsibilities for protecting water quality, including the selection and implementation of Best Management Practices. The proposed project would be programmed to follow the guidelines and procedures outlined in the latest Statewide Storm Water Management Plan to address stormwater runoff.

Construction General Permit

Construction General Permit, Order No. 2022-0057-DWQ (adopted on September 8, 2022, and effective on September 1, 2023) regulates stormwater discharges from construction sites that result in a Disturbed Soil Area (DSA) of 1 acre or greater, and/or are smaller sites that are part of a larger common plan of development. By law, all stormwater discharges associated with construction activity where clearing, grading, and excavation result in soil disturbance of at least 1 acre must comply with the provisions of the General Construction Permit. Construction activity that results in soil disturbances of less than 1 acre is subject to this Construction General Permit if there is potential for significant water quality impairment resulting from the activity as determined by the Regional Water Quality Control Board. Operators of regulated construction sites are required to develop Stormwater Pollution Prevention Plans (SWPPPs); to implement sediment, erosion, and pollution prevention control measures; and to obtain coverage under the Construction General Permit.

The Construction General Permit separates projects into Risk Levels 1, 2, and 3. Risk levels are determined during the planning and design phases and are based on potential erosion and transport to receiving waters. Requirements apply according to the Risk Level determined. For example, a Risk Level 3 (highest risk) project would require compulsory stormwater runoff pH and turbidity monitoring, and before construction and after construction aquatic biological assessments during specified seasonal windows. For all projects subject to the permit, applicants are required to develop and implement an effective Stormwater Pollution Prevention Plan. In accordance with Caltrans' Statewide Storm Water Management Plan and Caltrans Standard Specifications, a Water Pollution Control Program is necessary for projects within a Disturbed Soil Area less than 1 acre.

Section 401 Permitting

Under Section 401 of the Clean Water Act, any project requiring a federal license or permit that may result in a discharge to a water of the U.S. must obtain a 401 Certification, which certifies that the project will be in compliance with state water quality standards. The most common federal permits triggering 401 Certification are Clean Water Act Section 404 permits issued by the U.S. Army Corps of Engineers. The 401 permit certifications are obtained from the appropriate Regional Water Quality Control Board, dependent on the project location, and are required before the U.S. Army Corps of Engineers issues a 404 permit.

In some cases, the Regional Water Quality Control Board may have specific concerns with discharges associated with a project. As a result, the Regional Water Quality Control Board may issue a set of requirements known as Waste Discharge Requirements under the State Water Code (Porter-Cologne Act) that define activities, such as the inclusion of specific features, effluent limitations, monitoring, and plan submittals that are to be implemented for protecting or benefiting water quality. Waste Discharge Requirements can be issued to address both permanent and temporary discharges of a project.

Affected Environment

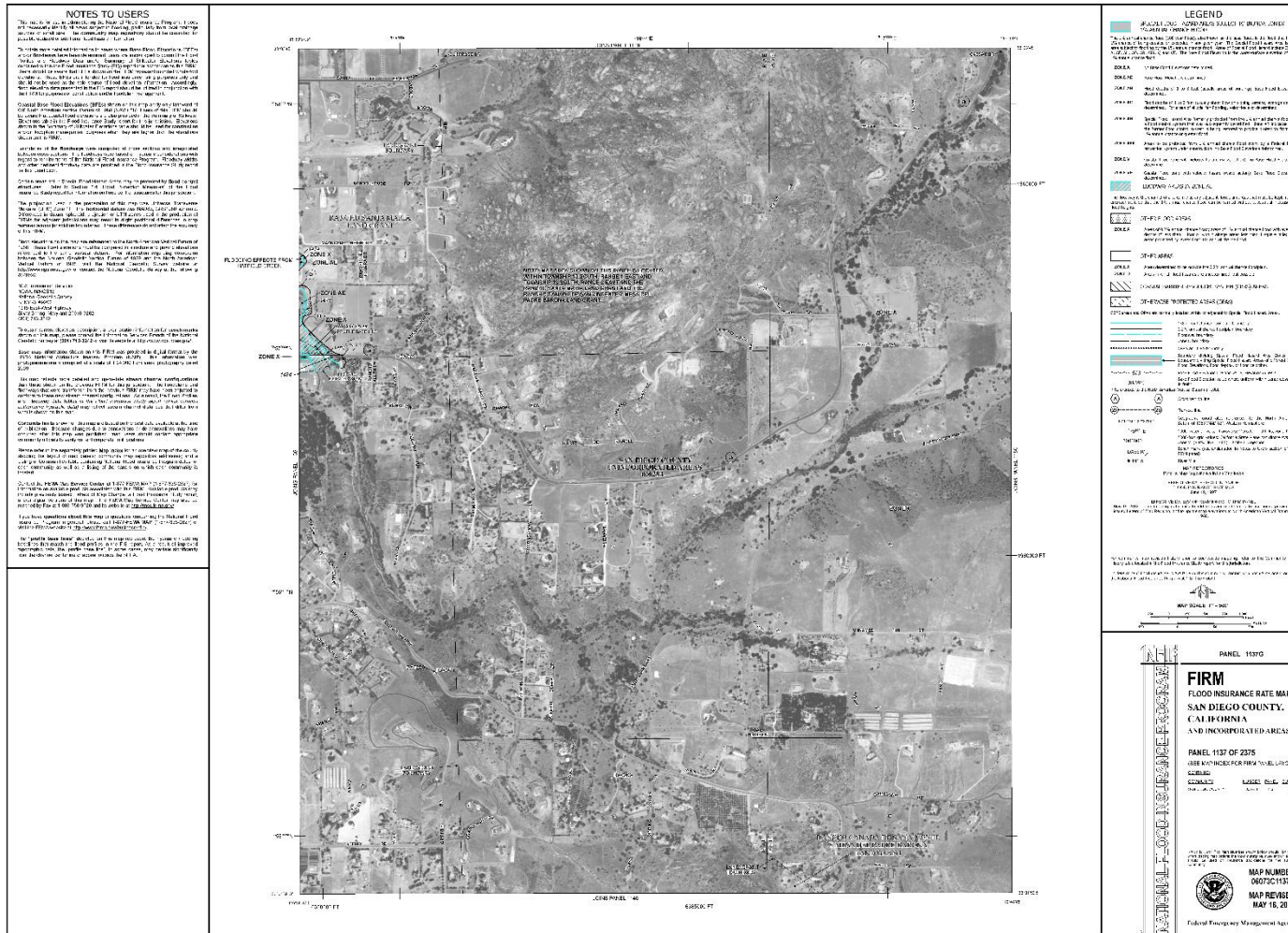
The proposed project is along State Route 78 in a rural area of eastern San Diego County. Santa Maria Creek, which originates just west of Lake Sutherland in the eastern portion of the San Dieguito Watershed, is the largest waterbody in the project limits. Santa Maria Creek flows westward to its confluence with Santa Ysabel Creek and ultimately the San Dieguito River. Hatfield Creek, a tributary to Santa Maria Creek, is also located within the project limits. Beneficial uses for the area include municipal groundwater, agriculture, industrial, recreation, warm freshwater habitat, and wildlife habitat (San Diego Regional Water Quality Control Board 2024).

The project is within the Ramona Hydrologic Subarea of the Santa Maria Valley Hydrologic Area, within the San Dieguito Hydrologic Unit. The project

overlies the Santa Maria Valley Groundwater Basin. Groundwater levels in the area fluctuate based on seasonal precipitation patterns, streamflow, groundwater pumping, and other factors. The project area has historically contained various agricultural and rural uses that rely on domestic wells to meet demands.

The proposed project would occur within existing developed roadways and Caltrans facilities. The northern portion of the project site between West Haverford Road (post mile 33.7) and south of Poplar Street is not near a Federal Emergency Management Agency-defined floodway and floodplain. However, the proposed project crosses Santa Maria Creek just prior to the intersection with State Route 76/Main Street in downtown Ramona. Santa Maria Creek has a Federal Emergency Management Agency-defined floodway and floodplain within the project area and is listed as a flood hazard Zone AE and Zone X in the vicinity of downtown Ramona. The Santa Maria Creek floodway and floodplain is shown on Flood Insurance Rate Map (FIRM) 06073C1136G (Figure 2-1). Also, the eastern portion of the project would cross over Hatfield Creek. The Hatfield Creek floodway and floodplain is shown on Flood Insurance Rate Map 06073C1137G (Figure 2-2). The majority of the project footprint starting from Olive Street south is within the boundaries of Flood Insurance Rate Map 06073C1136G, with the easternmost portion of the project adjacent to Rancho Allen Lane (post mile 37.3) within the boundaries of Flood Insurance Rate Map 06073C1137G.

Figure 2-2: FEMA Floodplain Map 06073C1137G



The proposed project features within the floodplain include pavement rehabilitation, removal/installation of new guardrails and concrete anchor blocks, and temporary staging. State Route 78 crosses over Santa Maria Creek and Hatfield Creek on existing bridges that would not be modified by the project. Project improvements would primarily occur within existing developed facilities in the floodplain Zone AE and Zone X, or outside of the floodplain entirely (FEMA 2024).

The project area primarily consists of impervious roadway surfaces, although some portions of the shoulder along State Route 78 are unpaved/pervious. Stormwater runoff enters Santa Maria Creek and Hatfield Creek through existing conveyance structures (drain inlets, drainpipes, and outfalls); drains westward into the Santa Maria Valley from elevated areas; or naturally infiltrates into the soil.

Environmental Consequences

The proposed project would result in greater than 1 acre of soil disturbance during construction. Water quality impacts during construction could result from stormwater runoff leaving construction sites and causing erosion or sedimentation or conveying pollutants into nearby waterways, such as Santa Maria Creek and Hatfield Creek. However, construction of the proposed project would occur in compliance with Caltrans' Statewide National Pollutant Discharge Elimination System Permit (Order No. 2012-0011-DWQ, NPDES Permit No. CAS000003) and the Statewide General National Pollutant Discharge Elimination System Permit for Construction Activities (Order No. 2022-0057-DWQ, NPDES Permit No. CAS000002), which regulate stormwater and non-stormwater discharges. The construction contractor would be required to develop, implement, and maintain a Stormwater Pollution Prevention Plans that (1) meets the requirements of the Construction General Permit and identifies potential pollutant sources associated with construction activities; (2) identifies non-stormwater discharges; and (3) identifies, implements, and maintains Best Management Practices to reduce or eliminate pollutants associated with the construction sites. Compliance with these existing regulations would avoid or minimize construction water quality impacts. Once operational, the proposed project would not change the existing use of the roadway, create substantial additional runoff, or otherwise increase the risk of water quality impacts. Replacement culverts would be sized appropriately to convey stormwater runoff during peak flows and minimize the potential for failure and subsequent water quality impacts. Therefore, the impact to surface water or groundwater quality would be less than significant.

The proposed project would make improvements to existing facilities along State Route 78 without modifying existing drainage patterns. The project includes the improvement of 12 pipe segments for five culvert systems within the project limits; replacement culverts would be sized appropriately to convey peak flows and minimize water quality impacts. Culvert replacement

or rehabilitation would conform to Caltrans’ design standards to maintain the integrity of the highway and surrounding drainage system. The proposed project would replace or improve existing facilities without creating substantial additional runoff that could increase erosion, sedimentation, or flooding on- or off-site.

As described above, the proposed project would make limited improvements within a mapped Federal Emergency Management Agency floodplain, consisting of pavement rehabilitation, installation of new guardrails, removal of asphalt concrete dikes, and installation of new hot mix asphalt dikes. Minor grading/benching within the floodplain would occur to install new guardrails adjacent to the roadway. These improvements would occur within the existing developed highway facility and would not have a measurable effect on flows within any watercourse or a regulatory floodway. For these reasons, the proposed project would have a less than significant impact on flood risk.

Avoidance, Minimization, and/or Mitigation Measures

With adherence to Caltrans’ standard design and construction practices, which are required on all projects, adverse effects related to hydrology and water quality would be avoided or minimized. No additional measures are required.

2.1.11 Land Use and Planning

Question—Would the project:	CEQA Significance Determinations for Land Use and Planning
a) Physically divide an established community?	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact

Discussion of Land Use and Planning Evaluation

The proposed project would not construct any barriers or inhibit access to and from the community of Ramona. The project complies with the Ramona Community Plan because the project replaces or improves existing facilities and maintains the existing land use and community boundaries. During construction, the proposed project would implement a Traffic Management Plan to ensure that community access is retained throughout construction. Therefore, there would be no impact.

2.1.12 Mineral Resources

Question—Would the project:	CEQA Significance Determinations for Mineral Resources
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?	No Impact
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?	No Impact

Discussion of Mineral Resource Evaluation

The County of San Diego operates three active mines in the unincorporated County area. The Olive Street Borrow Pit is within the community of Ramona, approximately 0.3 mile west of the project site (County of San Diego 2011b). The proposed project would have no impact on this active mine due to the distance. Also, the County of San Diego has designated one resource conservation area (#48 Pegmatite District) that contains important mineral resources. This area is approximately 1.10 miles south of the project site. There are no other known mines and mineral resources within the project area, as identified by the California Department of Conservation (California Department of Conservation 2024). Therefore, the proposed project would not result in the loss of mineral resources or mineral resource recovery sites. There would be no impact.

2.1.13 Noise

Question—Would the project result in:	CEQA Significance Determinations for Noise
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	No Impact

Question—Would the project result in:	CEQA Significance Determinations for Noise
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact

Discussion of Noise Evaluation

The proposed project is classified as a Type III project, which is exempt from analysis under 23 Code of Federal Regulations 772; thus, no noise abatement analysis is included herein (Caltrans 2020a). The proposed project would be located on State Route 78 within Caltrans right-of-way in both rural and urban areas of the community of Ramona. State Route 78 is a highly traveled roadway with an annual average daily traffic ranging from approximately 8,000 to 20,000 vehicle trips within the general project limits. The proposed improvements would not modify the roadway in a way that would bring traveling vehicles (and associated roadway noise) closer to sensitive receptors, and no widening or capacity increase would occur. Therefore, the proposed project would not increase noise levels above existing conditions.

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

- Do not exceed an L_{max} (maximum sound level) of 86 dBA at 50 feet from the job site activities from 9 p.m. to 6 a.m.
- Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler.

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

There would be no operational change in use of the roadway, and vibration levels would remain the same as existing conditions. The proposed project would result in intermittent, localized vibration in the project area during

construction processes such as grading, excavation, and earthwork, along with equipment movement. The vibration levels created by the normal movement of vehicles including graders, front loaders, and backhoes used for construction are the same order of magnitude as the groundborne vibration created by heavy vehicles traveling on streets and highways. Therefore, operating equipment would not generate excessive groundborne noise or vibration, and there would be no impact.

Avoidance, Minimization, and/or Noise Abatement Measures

No avoidance, minimization, or mitigation is required.

2.1.14 Population and Housing

Question—Would the project:	CEQA Significance Determinations for Population and Housing
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact

Discussion of Population and Housing Evaluation

The proposed project would improve various assets along State Route 78 without increasing capacity of the highway or providing new access to the area. The proposed project would improve operational efficiency and safety of the highway but would not induce substantial unplanned population growth. The project would not result in any residential or commercial property relocations; thus, no displacement of people would occur, and no replacement housing would need to be constructed. Therefore, there would be no impact.

2.1.15 Public Services

Question:	CEQA Significance Determinations for Public Services
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection?	No Impact
Police protection?	No Impact
Schools?	No Impact
Parks?	No Impact
Other public facilities?	No Impact

Discussion of Public Services Evaluation

The proposed project would include the rehabilitation and enhancement of multiple assets on State Route 78 from post mile 33.7 to post mile 37.3 in the community of Ramona. Construction of the proposed project would be within existing developed Caltrans right-of-way and would be temporary and of short duration. During construction, a Traffic Management Plan would be in place to identify any needed closures and establish alternate routes to public facilities, such as schools and parks. Public roads would remain open to emergency vehicles at all times. Emergency service providers and first responders would be notified of construction sequencing and the potential for temporary lane closures and/or changes to traffic circulation. Therefore, no new or physically altered governmental facilities would be needed to maintain acceptable service ratios, response times, or performance objectives.

Once operational, the proposed project would improve travel efficiency and safety along State Route 78. No additional burden would be placed on public services. Therefore, there would be no impact.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measure to avoid or minimize effects on public services:

- Emergency service providers and first responders would be notified of construction sequencing and the potential for temporary lane closures and/or changes to traffic circulation, as identified in the Traffic Management Plan.

2.1.16 Recreation

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

Discussion of Recreation Evaluation

The proposed project would include the rehabilitation and enhancement of multiple assets on State Route 78 from post mile 33.7 to post mile 37.3 in the community of Ramona. These improvements would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur. Equipment and materials storage sites would be located as far away from park uses as feasible. Staging areas would be located within Caltrans right-of-way or immediately adjoining properties and would not require use of any recreational sites. The proposed project does not include recreational facilities and would not require the construction or expansion of recreational facilities. Therefore, the proposed project would have no impact on recreation.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measure to avoid or minimize effects on recreation:

- Equipment and materials storage sites would be located as far away from residential and park uses as feasible, and construction areas would be kept clean and orderly.

2.1.17 Transportation

Question—Would the project:	CEQA Significance Determinations for Transportation
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No Impact
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact
d) Result in inadequate emergency access?	No Impact

Discussion of Transportation Evaluation

The proposed project would include the rehabilitation and enhancement of multiple assets on State Route 78 from post mile 33.7 to post mile 37.3 in the community of Ramona. As discussed above, there are existing transit facilities along State Route 78 that include bus stops for North County Transit District’s Route 371 and San Diego Metropolitan Transit System’s Routes 891/892 through downtown Ramona. During construction, a Traffic Management Plan would be implemented to minimize any vehicle and transit delays along the roadway, and identify alternate routes as needed for all transportation modes. Once operational, the proposed project would improve operational efficiency and safety along the roadway. No transit or roadway facilities would be removed or inhibited by the proposed project.

Additionally, the proposed project would be compatible with future bicycle facilities, discussed above, due to the implementation of Complete Streets improvements and the negligible change in use of the roadway. The proposed project would improve pedestrian facilities in the area through installation of crosswalks and transportation management system improvements, such as pedestrian poles and pull boxes at specific intersections. Therefore, there would be no conflict with existing or planned pedestrian or bicycle facilities.

As mentioned above, the project proposes rehabilitation and enhancements of multiple transportation assets on State Route 78 in San Diego County. The proposed project would not induce travel for automobiles or increase vehicle miles traveled (VMT) because there would be no increase in capacity for automobiles. Therefore, there would be no impact due to conflict with CEQA Guidelines Section 15064.3, subdivision (b).

The proposed project would implement a Traffic Management Plan to ensure emergency vehicle access for first responders is maintained throughout construction. Once operational, the proposed project would not change the existing use of the roadway and would have no effect on emergency access.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measures to avoid or minimize transportation impacts:

- The construction contractor shall schedule truck trips outside of peak morning and evening commute hours and implement a Traffic Management Plan, to be developed during the design phase, to minimize the effects to traffic.
- Minimization measures to reduce traffic impacts resulting from construction activities would be implemented with the Traffic Management Plan including appropriate staging, timing, and sequencing of activities; maintenance of traffic in both directions; and advanced notification to motorists and nearby communities to inform the public of potential delays.

2.1.18 Tribal Cultural Resources

Considering the information compiled by Caltrans in the original Archaeological Survey Report (ASR) dated March 29, 2023, the First Supplemental Archaeological Survey Report dated September 15, 2023, and the Second Supplemental Archaeological Survey Report dated December 17, 2023, as well as the Historic Property Survey Report dated February 9, 2024, the following significance determinations have been made:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

Question:	CEQA Significance Determinations for Tribal Cultural Resources
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	No Impact

Question:	CEQA Significance Determinations for Tribal Cultural Resources
<p>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<p>No Impact</p>

Discussion of Tribal Cultural Resources Evaluation

As part of the Historic Property Survey Report and Archaeological Survey Report, a request for a Sacred Land File search was sent to the Native American Heritage Commission (NAHC) on December 6, 2022. A response was received on December 19, 2022, which indicated presence of Native American cultural resources in the project’s vicinity. The Native American Heritage Commission recommended that Caltrans contact San Pasqual Band of Diegueño Indians (San Pasqual) and an additional 22 local Native American tribes and individuals for further consultation.

A total of 17 Native American tribes and individuals (28 contacts), including the San Pasqual Tribe specified by the Native American Heritage Commission, were contacted through various methods on various dates between December 21, 2022, and March 28, 2023. Follow-up efforts were made on various dates for tribes and individuals who did not respond. As of the date of this report, responses from 11 tribes and individuals were received. No resource-specific concern was identified as a result of the consultation.

All other tribes who responded to Caltrans’ consultation request indicated that either they do not wish to consult, or they would like to defer consultation to a tribe who is geographically located closer to the project location. Consultation is an ongoing process throughout the life of projects. Caltrans District 11 will continue consultation with local Native American tribes and individuals as necessary during final design and project implementation.

No concerns were received from tribes during consultation and there are no listed tribal cultural resources present within the proposed project impact areas. Therefore, the proposed project is unlikely to impact any tribal cultural resources. If buried cultural materials are encountered during construction, it is Caltrans' policy that work stop in that area until a qualified archaeologist can evaluate the nature and significance of the find. Additional survey will be

required if the project changes to include areas not previously surveyed. Therefore, there would be no impact.

2.1.19 Utilities and Service Systems

Question—Would the project:	CEQA Significance Determinations for Utilities and Service Systems
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	No Impact
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No Impact

Discussion of Utilities and Service System Evaluation

The proposed project would improve various components on State Route 78 to maintain the service life of the highway. The project would not create a new demand for utilities and service systems that would require construction of new or expanded facilities. Avoidance of existing utilities and minimization of conflicts and relocations would be a key component of the design process. Temporary interruptions to service are not anticipated; however, if determined necessary during final design, they would be scheduled during non-use or off-peak service periods to minimize disruption and notifications to any affected parties would be made in advance by the utility provider and/or Public Information Officer. This standard practice would ensure that any service

disruptions are understood by the public and do not pose a health or safety risk to individual customers.

The proposed project would not result in any population growth or subsequent increase in water demand, wastewater generation, or solid waste disposal needs. The proposed project may use a limited amount of water if necessary for dust control during construction; however, these demands would be negligible and would not exceed available supplies. Similarly, wastewater disposal would only be temporarily required during construction and would not exceed the treatment capacity of the Santa Maria Wastewater Reclamation Plant (SMWRP), which is capable of treating up to 1 million gallons per day. Solid waste disposal, including construction demolition debris recycling, would occur in accordance with Caltrans Standard Specifications 14-10 and would not exceed state or local standards or conflict with applicable statutes. The project would not require the construction of any new or expanded water, wastewater treatment, or solid waste disposal facilities. The project proposes replacement or rehabilitation of stormwater drainage facilities (culverts), the environmental effects of which are assessed throughout this document by resource area. Therefore, there would be no impact.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measure to avoid or minimize effects on utilities and service systems:

- Prior to construction activities, the construction contractor would contact utilities, DigAlert services, and/or other applicable entities to mark underground facilities, as needed.

2.1.20 Wildfire

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

Question—Would the project:	CEQA Significance Determinations for Wildfire
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No Impact

Question—Would the project:	CEQA Significance Determinations for 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?	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No Impact

Discussion of Wildfire Evaluation

The proposed project is within areas classified as Very High Fire Hazard Severity Zones (CAL FIRE 2023). Project construction activities would occur within existing developed Caltrans right-of-way that is operated and maintained by Caltrans. Emergency access could be temporarily affected by construction delays or road closures. However, the proposed project would implement a Traffic Management Plan to ensure emergency vehicle access for fire responders is maintained throughout construction. The applicable emergency response plan for the area is the County of San Diego’s Operational Area Emergency Operations Plan; the proposed project would not preclude implementation of this plan or otherwise interfere with emergency response in the area with implementation of a Traffic Management Plan (County of San Diego 2022b). Once operational, the proposed project would improve operational efficiency and safety along State Route 78 and would not affect emergency response or evacuation. Therefore, there would be no impact on emergency response or evacuation plans.

The project would adhere to Caltrans Standard Specifications 7-1.02M(2) to manage fire risk during construction, which requires preparation of a fire prevention plan. Wildfire risk would not be exacerbated by the proposed project due to slope, prevailing winds, or other factors. The proposed project would not require the installation of any infrastructure that could exacerbate wildfire risks or result in temporary or ongoing impacts to the environment. The proposed project would not change the grade of the roadway or surrounding areas in a manner that could result in post-fire instability. Once operational, the proposed project would not introduce new uses or develop facilities that could exacerbate wildfire risks. Therefore, there would be no impact.

Avoidance, Minimization, and/or Mitigation Measures

The proposed project would implement the following standard measures to avoid or minimize wildfire impacts:

- Emergency service providers and first responders would be notified of construction sequencing and the potential for temporary lane closures and/or changes to traffic circulation, as identified in the Traffic Management Plan.
- Per Caltrans Standard Specifications 7-1.02M(2) – Fire Protection, a fire prevention plan shall be prepared and submitted by the construction contractor prior to the start of job site activities. Fire prevention authorities shall be cooperated with during the performance of work, any fires shall be reported immediately, and fires shall be extinguished if caused directly or indirectly by job site activities.

2.1.21 Mandatory Findings of Significance

Question:	CEQA Significance Determinations for Mandatory Findings of Significance
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Less Than Significant Impact
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.)	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	No Impact

Affected Environment

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of the

proposed project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a period of time.

Cumulative impacts to resources in the project area may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and introduction or promotion of predators. They can also contribute to potential community impacts identified for the project, such as changes in community character, traffic patterns, housing availability, and employment.

CEQA Guidelines Section 15130 describes when a cumulative impact analysis is necessary and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts under CEQA can be found in Section 15355 of the CEQA Guidelines.

Caltrans internal records and the State Clearinghouse CEQANet web portal were reviewed to find cumulative projects occurring along State Route 78, or projects planned to occur in the future, that could overlap with the project footprint or otherwise affect similar resource areas. Caltrans is undertaking various planned projects along State Route 78, including the State Route 78 Culvert and Road Rehabilitation Project and the Interstate 15/State Route 78 Managed Lanes Direct Connectors Project. These projects also involve improvements to State Route 78 in San Diego County but do not overlap with the project footprint. Also, routine maintenance projects (e.g., tree trimming, facility repairs) occur on an as-needed basis; these projects may occur within the project area depending on the maintenance required.

Environmental Consequences

The proposed project is in a rural/semi-urban setting and does not involve significant changes to the existing use of the infrastructure or surrounding land uses. As described in this Initial Study, the proposed project would not substantially degrade the environment or eliminate important examples of California history. The proposed project involves construction activity within existing developed Caltrans facilities. The level of construction required by the proposed project would be minimal, resulting in minor temporary and short-term activities, which would not substantially reduce habitat or restrict the range of special-status plant or animal species (see Section 2.1.4 – Biological Resources). Avoidance and minimization measures would be implemented during construction to limit the potential for significant impacts. Further, the proposed project would not affect current operations and maintenance

activities and would not result in a substantial change to the environment once constructed. Therefore, these impacts would be less than significant.

Construction of the proposed project would result in temporary and short-term impacts that would be limited to the project site and immediate vicinity. Although impacts related to resources such as air quality, greenhouse gas emissions, and traffic would contribute to regional impacts, these impacts would not make a cumulatively considerable contribution to any significant cumulative impact resulting from other past, present, and reasonably foreseeable future projects in the vicinity of the site. This is due to the scale of the proposed project activities, limited nature of construction-related impacts over a relatively short construction period, minimal operational change, and the proposed avoidance and minimization measures that would limit the potential for any significant impacts. Further, there are no planned or under construction cumulative projects that have been identified in the project footprint that could overlap with project effects on other resources.

As discussed in this Initial Study, the proposed project would result in less than significant impacts or no impacts on the following resource areas: Aesthetics, Agriculture and Forestry Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire. Avoidance and minimization measures are included as part of the proposed project to limit the potential for any significant impacts. Therefore, all impacts would be avoided or minimized, and the proposed project would not make a cumulatively considerable contribution to significant cumulative impacts on any of these resource areas. The incremental effect of the proposed project would not be cumulatively considerable when viewed in connection with the effects of past, present, and reasonably foreseeable future projects. Therefore, there would be no impact.

The analysis conducted in this Initial Study concluded that the proposed project would not have a significant adverse effect on human beings. Air quality emissions during construction would be minimized through Caltrans Standard Specifications for dust control, proper equipment use, idling limits, and compliance with San Diego Air Pollution Control District rules and regulations. Hazardous materials used during construction would similarly be controlled through Caltrans Standard Specifications for proper storage, transport, and disposal of all materials. The proposed project is considered a Type III project, which would not require noise abatement, and operational noise levels would remain similar to existing levels. Therefore, there would be no significant adverse effect on human beings.

Chapter 3 **Coordination**

The Notice of Intent (NOI) to Adopt a Negative Declaration for this project was distributed to federal, state, regional, and local agencies and elected officials, tribal groups, and interested groups, organizations, and individuals.

The Notice of Intent was also sent to property owners within a 500-foot buffer of the State Route 78 centerline within the project limits. A full distribution list for the project is available upon request at the Caltrans District 11 office.

Additionally, technical assistance was requested from the U.S. Fish and Wildlife Service for this project on December 28, 2023. Conferencing between Caltrans and the U.S. Fish and Wildlife Service occurred in January and February 2024 to address specific biological resources with potential to occur in the project limits. This information has been incorporated into the Natural Environment Study prepared for the proposed project and informed the biological analysis.

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Appendix A Title VI Policy Statement

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

OFFICE OF THE DIRECTOR
P.O. BOX 942873, MS-49 | SACRAMENTO, CA 94273-0001
(916) 654-6130 | FAX (916) 653-5776 TTY 711
www.dot.ca.gov



September 2022

NON-DISCRIMINATION POLICY STATEMENT

The California Department of Transportation, under Title VI of the Civil Rights Act of 1964, ensures “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Caltrans will make every effort to ensure nondiscrimination in all of its services, programs and activities, whether they are federally funded or not, and that services and benefits are fairly distributed to all people, regardless of race, color, or national origin. In addition, Caltrans will facilitate meaningful participation in the transportation planning process in a non-discriminatory manner.

Related federal statutes, remedies, and state law further those protections to include sex, disability, religion, sexual orientation, and age.

For information or guidance on how to file a complaint, or obtain more information regarding Title VI, please contact the Title VI Branch Manager at (916) 639-6392 or visit the following web page: <https://dot.ca.gov/programs/civil-rights/title-vi>.

To obtain this information in an alternate format such as Braille or in a language other than English, please contact the California Department of Transportation, Office of Civil Rights, at PO Box 942874, MS-79, Sacramento, CA 94274-0001; (916) 879-6768 (TTY 711); or at Title.VI@dot.ca.gov.

A handwritten signature in black ink, appearing to read 'Tony Tavares', is positioned above the name and title.

TONY TAVARES
Director

“Provide a safe and reliable transportation network that serves all people and respects the environment”

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Appendix B List of Technical Studies

The following studies and/or technical analyses have been prepared and are incorporated by reference into this Initial Study and can be found at: Caltrans District 11 Office, 4050 Taylor Street, San Diego, CA 92110.

AECOM. 2024. Climate Change and Greenhouse Gas Study – State Route 78 Ramona Asset Management Project.

Caltrans. 2023b. Archaeological Survey Report for the State Route 78 Pavement Rehabilitation Project, San Diego County, California.

Caltrans. 2023c. First Supplemental Archaeological Survey Report for the State Route 78 Pavement Rehabilitation Project, San Diego County, California.

Caltrans. 2023d. Second Supplemental Archaeological Survey Report for the State Route 78 Pavement Rehabilitation Project, San Diego County, California.

Caltrans. 2023e. State Route 78 Asset Management – Visual Impact Assessment.

Caltrans. 2024a. Historic Property Survey Report (HPSR) – State Route 78 Pavement Rehabilitation Project.

Caltrans. 2024b. Reevaluation 11-43088: State Route 78 Pavement Rehabilitation Project (Air Quality, Hazardous Waste, and Noise).

Caltrans. 2024c. Natural Environment Study – State Route 78 Pavement Rehabilitation.

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Appendix C Comment Letters and Responses

This appendix contains the comments received during the public circulation and comment period from April 15, 2024, to May 15, 2024, retyped for readability. The comment letters are stated verbatim as submitted, with acronyms, abbreviations, and any original grammatical or typographical errors included. A Caltrans response follows each comment presented.

The following is a list of the persons, organizations, and public agencies that commented during the public review period, and the date comments were received.

Comment #	Name	Title/Organization/Affiliation	Date
1	Victoria Tang	California Department of Fish and Wildlife (CDFW)	May 13, 2024

Comment #1: California Department of Fish and Wildlife

Dear Cristina Graciano,

The California Department of Fish and Wildlife (CDFW) has reviewed the Negative Declaration (ND) from the California Department of Transportation (Caltrans) for the SR-78 Ramona Asset Management Project (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, CDFW appreciates 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

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.

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.

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: Caltrans

Objective: The objective of the Project is to make improvements to State Route (SR) 78 to extend the service life of the highway and improve the ride quality of the pavement. The Project will involve removal and replacement of pavement, modifications to drainage systems such as culverts, upgrading curb ramps, and safety elements such as signage, guardrails, and crosswalks.

Location: The Project is located along a 3.6-mile portion of SR-78 in eastern San Diego County, between post mile 33.7 to post mile 37.54. The Project passes through unincorporated areas, primarily the community of Ramona. Biological Setting: This portion of SR-78 crosses over two creeks: Santa Maria Creek and Hatfield Creek. Seven land cover types are described as being in the Biological Study Area: Diegan coastal sage scrub (1.58 acres), coast live oak woodland (0.45 acre), disturbed (10.74 acres), field/pasture (5.44 acres), vineyards and orchards (0.97 acre), southern riparian scrub (1.32 acres), and urban/developed (90.0 acres). The environmental document states that no impacts will occur to the sensitive communities on site, only to disturbed habitat, urban/developed, field/pastureland covers. As a result, no compensatory mitigation is proposed for loss of habitat.

Per the ND, one special-status plant and six special-status animal species could be impacted by Project activities. These are: Brewer's calandrinia (*Calandrinia breweri*; California Rare Plant Rank 4.2), Crotch's bumble bee (*Bombus crotchii*; CESA candidate species), western spadefoot (*Spea hammondi*; Species of Special Concern (SSC)), Coronado skink (*Plestiodon skiltonianus interparietalis*; Watch List), southern California legless lizard

(*Anniella stebbinsi*; SSC), California glossy snake (*Arizona elegans occidentalis*; SSC), and two-striped gartersnake (*Thamnophis hammondi*; SSC).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Caltrans in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

- 1) Environmental Document: CDFW is concerned that impacts to biological resources are not appropriately mitigated, given the Project activities described and the scope of the environmental document. Per the ND, the Project could affect special-status plant and animal species during construction activities. Additionally, impacts to the bed, bank, and channel of the two streams within the Project area could occur (see Comment 4). Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a Project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). If there are potentially significant impacts due to a project, but these impacts can be mitigated to less than significant, a Mitigated Negative Declaration (MND) should be prepared. CDFW recommends that Caltrans recirculate this environmental document as an MND. The MND should include discussion of the biological resources impacts described in the comments below and provide mitigation measures which reduce the impacts to below significant.
- 2) Crotch's Bumble Bee: There is potential for Crotch's bumble bee to occur on site. The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. CDFW considers adverse impacts to a species protected by CESA, for the purposes of CEQA, to be significant without mitigation.

The ND states that prior to the start of construction, a qualified biologist will perform bumble bee nest surveys using the most current methodologies developed by CDFW, but the details of these methods are not discussed. CDFW's Survey Considerations for CESA Candidate Bumble Bees can be found at the following link: <https://wildlife.ca.gov/Conservation/CESA>. This document discusses habitat assessment, survey methods, monitoring and reporting, and when to contact CDFW. The environmental document should include detailed information about survey methods, timing, and avoidance of impacts.

CDFW recommends that the following mitigation measures be added to the recirculated MND:

Crotch's Bumble Bee Surveys: Prior to Project activities, the Project proponent shall retain a qualified entomologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project-related ground-disturbing activities.

Incidental Take Permit: If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided, the Project applicant shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project applicant shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project applicant shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.

- 3) Relocating Wildlife. The ND states that a biologist will monitor grading activities in areas where small mammal burrows are present within the construction footprint. If a special-status species is discovered, the biologist would capture and relocate it to suitable habitat at least 200 feet from the work site. CDFW strongly recommends avoidance of any special-status species. Any special-status species that may be discovered on site should be allowed to move away on their own. If there is a plan to capture and relocate wildlife, a Scientific Collecting permit is necessary. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). A Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). For more information, please see our website at Scientific Collecting Permits (ca.gov). The recirculated MND should include the following mitigation measure:

Wildlife Construction Monitoring: A qualified biologist will monitor vegetation removal and grading activities within the construction footprint. If a special-status species is discovered, the biologist will halt work in the area until they determine that the animal has left on its own. If this is not feasible, a qualified biologist with appropriate handling permits such as a Scientific Collecting Permit will capture and relocate the animal to a suitable nearby habitat out of harm's way.

- 4) Lake and Streambed Alteration. The ND does not explicitly state that permits will be obtained for impacts to Santa Maria Creek and Hatfield Creek, which will occur as a result of culvert installation. CDFW has regulatory authority over activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. This Project crosses over and may impact two streams. As a result, CDFW recommends that Caltrans coordinate with CDFW regarding the LSA Notification. A Notification package may be obtained by accessing CDFW's web site at <http://www.wildlife.ca.gov/Conservation/LSA>.

CDFW recommends that the following mitigation measure be added to the recirculated MND:

The Project proponent shall notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to obtaining a grading permit. The LSA Notification shall include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity. The Project proponent shall comply with the mitigation measures detailed in an LSA Agreement issued by CDFW. The Project proponent shall also provide compensatory mitigation at no less than 2:1 for any impacted stream and associated natural community, or at a ratio acceptable to CDFW.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any

special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:
http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf.
The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link:
http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the ND to assist Caltrans in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Brigid Moran at (858) 354-3527 or Brigid.Moran@wildlife.ca.gov.

Response to Comment 1

Caltrans thanks CDFW for reviewing the draft environmental document. CDFW's role as California's Trustee Agency for fish and wildlife resources and as a Responsible Agency under CEQA for the proposed project is acknowledged. The project description summary is correct.

Response 1-1 (Environmental Document):

The commenter is correct in that potential effects on special-status species could occur during the course of project construction, based on proximity of suitable habitat, foraging sites, and historical records in the area. However, given that the proposed project's impact areas would be primarily within the developed roadway or disturbed roadway shoulders, and standard avoidance and minimization measures would be implemented to avoid or minimize impacts to special-status species, these potential effects were determined to be less than significant. Thus, an Initial Study with Negative Declaration has been prepared. All avoidance and minimization measures identified in the environmental document will become part of the project's environmental commitments record and included in all construction documents. Caltrans routinely implements measures such as those identified in the environmental

document to avoid impacts to sensitive environmental resources as part of its standard construction practices and commitment to reduce environmental harm. Caltrans is committed to working with CDFW to incorporate sufficient measures into the project to provide maximum protection for special-status species with potential to occur in the area. As such, the suggested modifications and/or additions to avoidance and minimization measures provided by CDFW have been incorporated into Section 2.1.4 of this document, with minor modifications.

Regarding impacts to bed, bank, and channel of Santa Maria Creek and Hatfield Creek, there would be no construction occurring in these areas. Work in the immediate vicinity of these two creeks would be limited to guardrail replacements within disturbed roadway and shoulder areas. The culvert replacements are not located at these features. Proposed work for repaving and metal beam guardrail replacement occurs on pavement or on the disturbed shoulders approaching the bridges over these creeks. Riparian habitat associated with Santa Maria Creek and Hatfield Creek would also not be impacted by the proposed project. This has been further clarified in Sections 1.3 and 2.1.4 of this document.

Response 1-2 (Crotch's Bumble Bee):

Detailed information about survey methods, timing, and avoidance of impacts for Crotch's Bumblebee has been incorporated into Section 2.1.4 of this document per CDFW's recommendations. With implementation of these measures, substantial adverse effects to Crotch's Bumblebee are not anticipated to occur.

Response 1-3 (Relocating Wildlife):

Caltrans acknowledges the primary emphasis on avoidance measures as opposed to handling of wildlife. These measures have been incorporated into Section 2.1.4 of this document.

Response 1-4 (Lake and Streambed Alteration):

See Response 1-1. Given that no work would occur within the bed, bank, or channel of Santa Maria Creek or Hatfield Creek, an LSA Notification pursuant to Fish and Game Code Section 1602 is not anticipated. All culvert replacements within the project convey only roadside drainage and are considered non-jurisdictional. If any project design changes occur which necessitate work in jurisdictional areas, Caltrans will notify CDFW and other relevant agencies as appropriate.