

Alpine County State Route 4 Drainage System Restoration

State Routes 4 and 207 in Alpine County

10-ALP-4,207- Post Miles Vary

EA 10-1L660 and Project Number 1020000171

State Clearinghouse Number 2024091083

Initial Study with Mitigated Negative Declaration and Section 4(f) De Minimis Determination

Volume 1 of 2



Prepared by the
State of California Department of Transportation

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General Information About This Document

Document prepared by: Alexandros Xides, Environmental Scientist - Generalist

The Initial Study and Section 4(f) De Minimis Determination circulated to the public for 33 days between September 25, 2024, and October 28, 2024.

Comments received during this period are included in Appendix E. 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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State Clearinghouse Number 2024091083
10-ALP-4,207-Post Miles Vary
EA 10-1L660 / Project ID 1020000171

Rehabilitate existing drainage systems at 29 locations on
State Routes 4 and 207 in Alpine County

**INITIAL STUDY
with Mitigated Negative Declaration
and Section 4(f) De Minimis Determination**

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

THE STATE OF CALIFORNIA
Department of Transportation

C. Scott Guidi

C. Scott Guidi
Office Chief, District 10 Environmental
California Department of Transportation
CEQA Lead Agency

02/03/2025

Date

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

Laura Cook, 1976 East Doctor Martin Luther King Junior Boulevard, Stockton, California
95205, email: Laura.Cook@dot.ca.gov; phone: 209-662-2261



Mitigated Negative Declaration

Pursuant to: Division 13, Public Resources Code

State Clearinghouse Number: 2024091083

District-County-Route-Post Mile: 10-ALP-4,207- Post Miles Vary

EA/Project Number: 10-1L660/1020000171

Project Description

The California Department of Transportation (Caltrans) proposes to rehabilitate existing drainage systems at 29 locations on State Routes 4 and 207 in Alpine County. Existing drainage systems at proposed locations have exceeded their design life and have deteriorated or failed. The project work includes replacing or rehabilitating existing culverts, and upgrading or replacing end treatments and headwalls as needed.

Determination

An Initial Study has been prepared by Caltrans District 10. On the basis of this study, it is determined that the proposed action with the incorporation of the identified mitigation measures will not have a significant effect on the environment for the following reasons:

- BIO-21. Compensatory Mitigation – Wetlands and Other Waters of the United States: Loss of 0.01-acre of intermittent and ephemeral streams and 0.003-acre of wetlands potentially qualifying as waters of the United States will be compensated through the purchase of mitigation credits through the Sacramento United States Army Corps of Engineers' and National Fish and Wildlife Foundation's in-lieu fee program.
- BIO-22: Compensatory Mitigation – Riparian Vegetation. Impacts to 0.01-acre of riparian vegetation will be compensated at a 3-to-1 ratio with the establishment of 0.03-acre of riparian vegetation at an undetermined onsite or offsite location.

C. Scott Guidi

C. Scott Guidi
Office Chief, District 10 Environmental
California Department of Transportation

02/03/2025

Date

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Chapter 1 Proposed Project

1.1 Introduction

The California Department of Transportation (Caltrans) is the lead agency under the California Environmental Quality Act (known as CEQA) and the lead agency under the National Environmental Policy Act (known as NEPA). The project will take place in a mountainous, forested region of Alpine County along State Route 4 and 207 and proposes to rehabilitate or replace culverts at 29 drainage system locations along these routes. The original proposal included 72 drainage system locations, but over the course of field reviews, Caltrans identified that the majority of these locations remained in good condition and removed them from the scope of work. Additionally, one project location was removed since the draft environmental document was published, which reduced the number of locations from 30 to 29. The removed location was formally referred to as Location 28 on State Route 4, post mile 30.37 in the published draft environmental document. This location was removed, and the location numbering was updated, with previously referred to as Location 29 on State Route 207, post mile 0.38 now referred to as Location 28, and previous Location 30 on State Route 207, post mile 1.19 now referred to as Location 29. These changes in scope and numbering were made throughout this document, including an updated Figure 1-2.

1.2 Purpose and Need

1.2.1 Purpose

The purpose of this project is to maintain the serviceability of existing drainage systems by rehabilitating or replacing culverts in Alpine County that have exceeded their design life, deteriorated, or failed.

1.2.2 Need

The project is needed because the Maintenance Engineering Culvert Inspection Team reported that several existing culverts are in need of repair or replacement. Many drainage systems have exceeded their design life and have deteriorated, corroded, and experienced damage as well as shape loss and joint separation. If these culverts are allowed to continue to deteriorate, the roadway will be undermined.

1.3 Project Description

Caltrans proposes to rehabilitate existing drainage systems at 29 locations on State Routes 4 and 207 in Alpine County. Existing drainage systems at these locations have exceeded their design life and have deteriorated or failed. The project work includes replacing or rehabilitating existing culverts and upgrading or replacing end treatments and headwalls as needed.

Figure 1-1 Project Vicinity Map

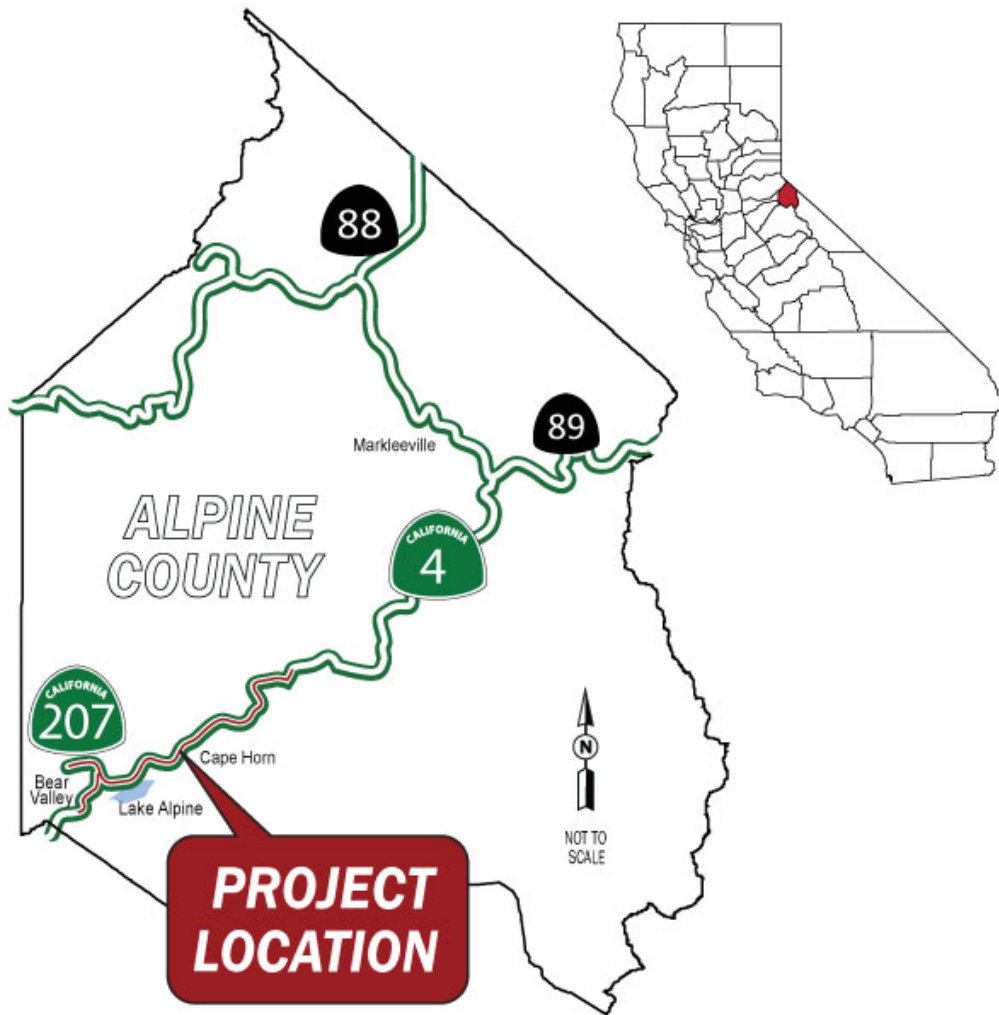
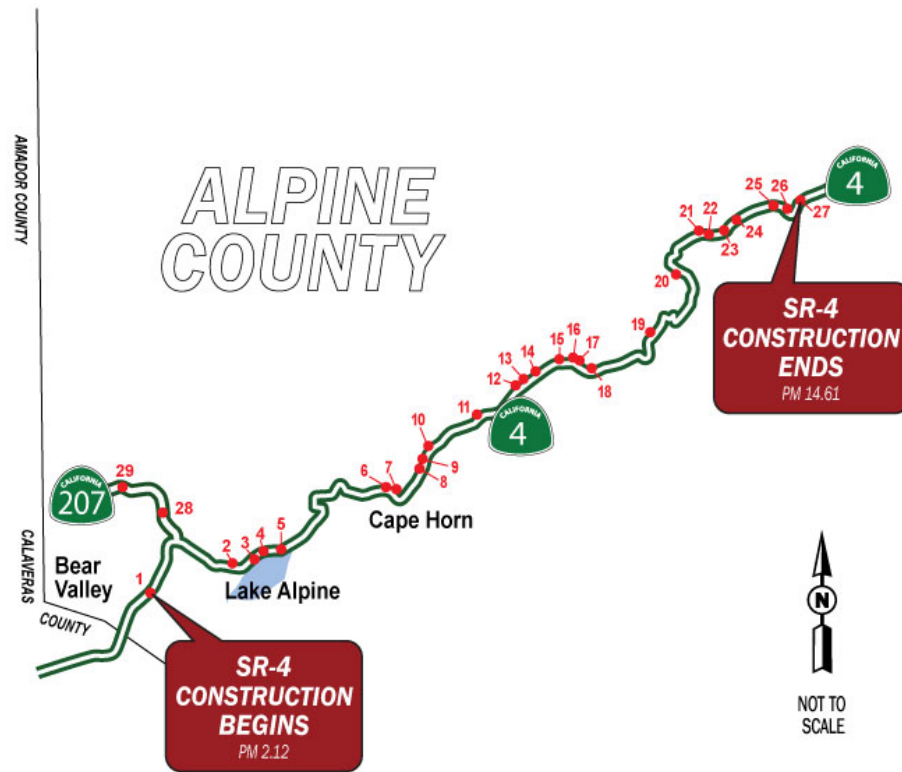


Figure 1-2 Project Location Map



1.4 Project Alternatives

The proposed project has two alternatives under consideration—one Build Alternative and one No-Build Alternative.

1.4.1 Build Alternatives

The Build Alternative will rehabilitate 29 existing drainage systems in Alpine County by repairing or replacing existing culverts and upgrading or replacing end treatments and headwalls as needed.

The majority of culvert replacements will be performed with the cut-and-cover method, which involves trenching from above, removal of the old culvert, installing the new culvert, filling and compacting the trench, and paving over it. Vegetation removed during the process will be replanted as necessary. This method results in a smaller temporary disturbance area that extends along the culvert's length and includes a 10-foot by 10-foot area at the inlet and outlet of the pipe. However, for culverts deep enough to have 15 or more feet of cover, the jack-and-bore method may be required instead. This entails excavating a sending pit and a receiving pit, and then boring under the

roadway to replace or install the culvert pipe. This method will be used only where necessary, as it will result in a larger area of potential impacts. These impacts will include two 25-foot long, 10-foot wide, and 3-foot deep pits, as well as temporary disturbance areas of 10 feet around the pits and access routes.

The following two paragraphs and list of measures have been added after publication of the draft environmental document. The Build Alternative would involve the following traffic control requirements. Construction work and lane closures will be limited to weekdays to limit impacts to the public during the weekend peak periods of travel and recreational use. One traffic-through lane will be maintained throughout construction where feasible.

Full closures will be required for Locations 2 through 11, where State Route 4 narrows to one shared lane. Where these full closures are necessary, Caltrans will comply with the following traffic management recommendations provided by the U.S. Forest Service and agreed upon by Caltrans. Full descriptions of these measures are included in Appendix B.

- TC-1. Full closure timing restrictions.
- TC-2. Traffic control schedule.
- TC-3. Traffic control specifications.

The following list of project locations has been updated since the publication of the draft environmental document. The following work is proposed at the below drainage system locations.

- **Location 1 on State Route 4, post mile 2.12:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Install concrete flared end section at inlet. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 2 on State Route 4, post mile 3.66:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Regrade outlet channel within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 3 on State Route 4, post mile 3.99:** Replace 18-inch corrugated steel pipe with 30-inch span by 19-inch rise elliptical concrete pipe with rubber gasket joint. Add rock slope protection at outlet. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 4 on State Route 4, post mile 4.04:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe. Add rock

slope protection at outlet. Backfill with cement concrete along the length of the culvert under the roadway.

- **Location 5 on State Route 4, post mile 4.40:** Replace 18-inch corrugated steel pipe with 30-inch span by 19-inch rise elliptical concrete pipe with rubber gasket joint. Add rock slope protection at outlet. Regrade outlet channel within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 6 on State Route 4, post mile 6.57:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Install concrete flared end section at inlet and outlet. Regrade outlet channel within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway. A temporary construction easement is required from United States Forest Service for this location.
- **Location 7 on State Route 4, post mile 6.61:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Install concrete flared end section at inlet and outlet. Regrade outlet channel within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 8 on State Route 4, post mile 7.25:** Replace 24-inch corrugated steel pipe with 34-inch span by 22-inch rise elliptical concrete pipe with rubber gasket joint. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 9 on State Route 4, post mile 7.27:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 10 on State Route 4, post mile 7.35:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Regrade inlet and outlet channel within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 11 on State Route 4, post mile 7.53:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Grade inlet channel within right-of-way. Install concrete headwall at inlet. Remove tree trunk obstruction at the outlet. A temporary construction easement is required from United States Forest Service at this location.
- **Location 12 on State Route 4, post mile 8.34:** Replace 18-inch corrugated steel pipe with 30-inch span by 19-inch rise elliptical concrete pipe with rubber gasket joint. Backfill with cement concrete along the length of the culvert under the roadway. This location is in a blue line watershed and may experience constant water flows.

Installation of cofferdam to pump water from upstream to downstream and temporarily drain a portion of the channel during construction may be necessary. A determination on whether the cofferdam is needed will be made by the end of the design phase of the project. A temporary construction easement is required from United States Forest Service at this location.

- **Location 13 on State Route 4, post mile 8.94:** Replace 18-inch corrugated steel pipe with 38-inch span by 24-inch rise elliptical concrete pipe with rubber gasket joint. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 14 on State Route 4, post mile 8.99:** Replace 18-inch corrugated steel pipe with 30-inch reinforced concrete pipe with rubber gasket joint. Install concrete headwall at inlet and outlet. Add additional rock slope protection at outlet. Backfill with cement concrete along the length of the culvert under the roadway. This location is in a blue line watershed and may experience constant water flows. Installation of cofferdam to pump water from upstream to downstream and temporarily drain a portion of the channel during construction may be necessary. A determination on whether the cofferdam is needed will be made by the end of the design phase of the project.
- **Location 15 on State Route 4, post mile 9.12:** Replace 24-inch corrugated steel pipe with 38-inch span by 24-inch rise elliptical concrete pipe with rubber gasket joint. Install stress reducing slab. Add additional rock slope protection on outlet embankment. Remove vegetation obstructing culvert outlet.
- **Location 16 on State Route 4, post mile 9.59:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Install concrete headwall at inlet and outlet. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 17 on State Route 4, post mile 9.64:** Replace 18-inch corrugated steel pipe with 30-inch reinforced concrete pipe with rubber gasket joint. Grade inlet and outlet channel within right-of-way. Add rock slope protection at inlet within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 18 on State Route 4, post mile 9.73:** Replace 18-inch corrugated steel pipe with 34-inch span by 22-inch rise elliptical concrete pipe with rubber gasket joint. Add rock slope protection along inlet embankment and outlet. Regrade inlet and outlet channel within right-of-way.
- **Location 19 on State Route 4, post mile 9.89:** Replace 18-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Install stress-reducing slab. Install concrete flared end section at outlet. Regrade outlet channel within right-of-way.

- **Location 20 on State Route 4, post mile 10.93:** Replace 18-inch corrugated steel pipe with 34-inch span by 22-inch rise elliptical concrete pipe with rubber gasket joint. Install stress-reducing slab. Remove debris obstructing inlet.
- **Location 21 on State Route 4, post mile 12.26:** Replace 12-inch corrugated steel pipe with 18-inch reinforced concrete pipe with rubber gasket joint. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 22 on State Route 4, post mile 13.20:** Replace 36-inch corrugated steel pipe with 72-inch span by 48-inch rise concrete box culvert. Install concrete headwalls at inlet and outlet. Install light rock slope protection at outlet within right-of-way. Regrade inlet and outlet channels. This location is marked as an intermittent stream and may experience water flows during construction. Installation of cofferdam to pump water from upstream to downstream and temporarily drain a portion of the channel during construction may be necessary. A determination on whether the cofferdam is needed will be made by the end of the design phase of the project. A temporary construction easement is required from United States Forest Service at this location.
- **Location 23 on State Route 4, post mile 13.60:** Replace 24-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber gasket joint. Add rock slope protection at inlet. Regrade outlet channel within right-of-way. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 24 on State Route 4, post mile 13.62:** Replace 24-inch corrugated steel pipe with 34-inch span by 22-inch rise elliptical concrete pipe with rubber gasket joint. Add additional rock slope protection at outlet drop. Backfill with cement concrete along the length of the culvert under the roadway. A temporary construction easement is required from United States Forest Service at this location.
- **Location 25 on State Route 4, post mile 14.16:** Replace 36-inch double barrel corrugated steel pipes with 48-inch reinforced concrete pipes with rubber gasket joints. Install concrete headwall at inlet. Backfill with cement concrete along the length of the culvert under the roadway. This location is in a blue line watershed and may experience constant water flows. Installation of cofferdam to pump water from upstream to downstream and temporarily drain a portion of the channel during construction may be necessary. A determination on whether the cofferdam is needed will be made by the end of the design phase of the project.
- **Location 26 on State Route 4, post mile 14.33:** Replace 24-inch corrugated steel pipe with 24-inch reinforced concrete pipe with rubber

gasket joint. Replace rock slope protection at inlet. Backfill with cement concrete along the length of the culvert under the roadway.

- **Location 27 on State Route 4, post mile 14.61:** Replace 18-inch corrugated steel pipe with 18-inch reinforced concrete pipe with rubber gasket joint. Install concrete flared end section. Add rock slope protection at inlet. Backfill with cement concrete along the length of the culvert under the roadway.
- **Location 28 on State Route 207, post mile 0.38:** Install cured-in-place pipe liner in existing 18-inch corrugated steel pipe. Install concrete collar and replace last 3 feet at outlet with reinforced concrete pipe. Remove tree trunks and other obstructions from the inlet and outlet. A temporary construction easement is required from United States Forest Service at this location.
- **Location 29 on State Route 207, post mile 1.19:** Install cured-in-place pipe liner in existing 18-inch corrugated steel pipe. Install concrete collar and replace last 3 feet at outlet with reinforced concrete pipe. A temporary construction easement is required from United States Forest Service at this location.

The temporary construction easements required for the project are at the following locations within United States Forest Service jurisdiction.

- Location 6 on State Route 4, post mile 6.57 (Stanislaus National Forest)
- Location 11 on State Route 4, post mile 7.53 (Stanislaus National Forest)
- Location 12 on State Route 4, post mile 8.34 (Stanislaus National Forest)
- Location 22 on State Route 4, post mile 13.20 (Stanislaus National Forest)
- Location 24 on State Route 4, post mile 13.62 (Stanislaus National Forest)
- Location 28 on State Route 207, post mile 0.38 (Stanislaus National Forest)
- Location 29 on State Route 207, post mile 1.19 (Stanislaus National Forest)

This 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 later in this chapter under “Standard Measures and Best Management Practices Included in All Build Alternatives.”

1.4.2 No-Build (No-Action) Alternative

The No-Build Alternative will not rehabilitate or replace the existing drainage systems. It will not address the purpose or need of the project, as it will allow the drainage systems to continue to deteriorate and eventually undermine the roadway.

1.5 Identification of a Preferred Alternative

This section was added after the draft environmental document completed public circulation. The Build Alternative has been identified as the preferred alternative, as the No-Build Alternative would leave the drainage systems in their current state and allow them to continue to deteriorate and eventually undermine the roadway. As such, the No-Build Alternative would not address the purpose and need of the project.

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

The following best management practices are anticipated to be implemented on the project, where applicable. The final list of best management practices will be submitted by the contractor and approved for inclusion in the construction contract by Caltrans later in the project design phase as part of the preparation of a Stormwater Pollution Prevention Plan or Water Pollution Control Plan.

- SC-1 through SC-10: Temporary Sediment Control
- SS-1 through SS-10: Temporary Soil Stabilization
- NS-3: Paving, Sealing, Sawing, Grooving and Grinding Activities
- NS-6: Illegal Connection and Illicit Discharge Detection and Reporting
- NS-8: Vehicle and Equipment Cleaning
- NS-9: Vehicle and Equipment Fueling
- NS-10: Vehicle and Equipment Maintenance
- NS-12: Concrete Curing

- NS-13: Material and Equipment Use Over Water
- NS-14: Concrete Finishing
- TC-1 through TC-3: Temporary Tracking Control
- WM-1: Material Delivery and Storage
- WM-2: Material Use
- WM-3: Stockpile Management
- WM-4: Spill Prevention and Control
- WM-5: Solid Waste Management
- WM-6: Hazardous Waste Management
- WM-7: Contaminated Soil Management
- WM-8: Temporary Concrete Washouts
- WM-9: Sanitary and Septic Waste Management
- WM-10: Liquid Waste Management

The following measures from the 2024 Caltrans Standard Specifications will also be implemented in the project, where applicable:

- Section 4-1.13: Scope of Work—Cleanup
- Section 7-1.02A: General (Legal Compliance)
- Section 7 1.02C: Emissions Reduction
- Section 7-1.02K(6)(j)(iii): Earth Material Containing Lead
- Section 10-5: Dust Control
- Section 13: Water Pollution Control
- Section 14-2.03A: Previously Unidentified Archaeological Resources
- Section 14-8.02: Noise Control
- Section 14-9.02: Air Pollution Control

- Section 20-1.03C(3): Weed Control
- Section 72-2: Rock Slope Protection
- Section 90: Concrete

1.7 Discussion of the NEPA Categorical Exclusion

This document contains information regarding compliance with the California Environmental Quality Act (CEQA) and other state laws and regulations. Separate environmental documentation, supporting a Categorical Exclusion determination, has been prepared in accordance with the National Environmental Policy Act. When needed for clarity, or as required by CEQA, this document may contain references to federal laws and/or regulations (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

The following permits, licenses, agreements, and certifications are required for project construction. The status column was updated after the draft environmental document completed circulation.

Agency	Permit/Approval	Status
Central Valley Regional Water Quality Control Board	Clean Water Act Section 401 Water Quality Certification	The permit will be obtained during the design phase of the project.
Lahontan Regional Water Quality Control Board	Clean Water Act Section 401 Water Quality Certification	The permit will be obtained during the design phase of the project.
U.S. Army Corps of Engineers	Clean Water Act Section 404 National Pollutant Discharge Elimination System Permit	The permit will be obtained during the design phase of the project.
California Department of Fish and Wildlife	California Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement	The permit will be obtained during the

Agency	Permit/Approval	Status
		design phase of the project.
United States Fish and Wildlife Service	Federal Endangered Species Act Section 7 Informal Consultation (Letter of Concurrence)	The Letter of Concurrence was obtained April 9, 2024.
State Historic Preservation Officer	Concurrence on Finding of No Adverse Effect (without Standard Conditions)	Concurrence was obtained on November 28, 2023.
United States Forest Service	Concurrence on Section 4(f) Finding of De Minimis Impact	Concurrence was obtained January 13, 2025.

Chapter 2 CEQA Evaluation

2.1 CEQA Environmental Checklist

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

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

“No Impact” determinations in each section are based on the scope, description, and location of the proposed project as well as the appropriate technical report (bound separately in Volume 2), and no further discussion is included in this document.

2.1.1 Aesthetics

Considering the information in the Scenic Resources Evaluation dated June 19, 2023, and the Natural Environment Study dated April 15, 2024, the following significance determinations have been made:

Except as provided in Public Resources Code 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?	Less than Significant 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?	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No Impact

Affected Environment

The project will take place along State Routes 4 and 207, in a forested area of Alpine County. State Route 4 is an Officially Designated State Scenic Highway in Alpine County, from post miles 0.0 to 31.7. The project will involve work off the paved roadway along the State Route 4, as well as temporary construction easements at eight locations adjacent to the roadway and managed by the United States Forest Service, as discussed in Section 1.4.1 of this document. Additional permanent right-of-way acquisition is not anticipated.

Environmental Consequences

The proposed work will involve vegetation and tree removals where needed to clear obstructions to the drainage systems along the State Route 4. The majority of vegetation removal will result in temporary visual impacts, as the site will be revegetated after construction is complete. Additionally, 0.01-acre of riparian vegetation will be permanently lost as a result of the rehabilitation and replacement efforts for the drainage systems in the project area. However, the small footprint of this vegetation loss is considered a less than significant impact to the visual character of the State Route 4 and will be compensated for by the measures outlined in the following section.

Avoidance, Minimization, and/or Mitigation Measures

Potential less than significant impacts to aesthetic resources in the project area will be avoided or minimized with the following measures. Full descriptions of these measures are included in Appendix B of this document. Please note, BIO-22 is used as a minimization measure for Aesthetics and is not considered mitigation for this determination regarding Section 2.1.1.

- BIO-6. Limit Vegetation Removal.

- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite.
- BIO-22. Compensatory Mitigation – Riparian Vegetation. Impacts to 0.01-acre of riparian vegetation will be compensated at a 3-to-1 ratio with the establishment of 0.03-acre of riparian vegetation at an undetermined onsite or offsite location.

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.

Considering the information in the Community Impact Memorandum dated January 23, 2025, and the Natural Environment Study dated April 15, 2024, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Agriculture and Forest 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

Question—Would the project:	CEQA Significance Determinations for Agriculture and Forest Resources
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?	Less than Significant 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

Affected Environment

The project will involve culvert replacement and drainage system improvement work at existing facilities along State Routes 4 and 207 in a forested area of Alpine County. The surrounding forest area is under the jurisdiction of the United States Forest Service. The majority of the proposed work will occur within Caltrans right-of-way, but temporary construction easements within the Stanislaus National Forest and Humboldt-Toiyabe National Forest will be required at the following eight culvert locations adjacent to Caltrans right-of-way. See Section 1.4.1 for the eight locations.

Environmental Consequences

The proposed work will involve vegetation and tree removals where necessary to clear obstructions to the drainage systems. The majority of these removals will only result in minor, temporary impacts, and will be replanted after construction, per the 2024 Caltrans Standard Specifications, and will be included in the construction contract.

The following paragraph has been updated since the publication of the draft environmental document. The project is also expected to result in a small area of permanent impacts from the trimming or removal of riparian trees and shrubs at the following four culvert locations. The vegetation removals at Location 25 on State Route 4, post mile 14.16 will only occur within Caltrans right-of-way. However, the work at Location 28 on State Route 207, post mile 0.38 and Location 29 on State Route 207, post mile 1.19 will involve vegetation removal within temporary construction easements from the United

States Forest Service. As a result, the work at these three locations will involve direct impacts to federal forest lands.

This riparian vegetation loss will only impact a small 0.01-acre area and is considered a less than significant impact. This less than significant impact will also be further minimized by the measures outlined in the following section.

Avoidance, Minimization, and/or Mitigation Measures

The following measures will be included in the construction contract to avoid and minimize potential impacts to forest land in the project area. Full descriptions of the measures are included in Appendix B of this document.

- BIO-6. Limit Vegetation Removal
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite

The following measure will compensate for the less than significant loss of 0.01-acre of riparian vegetation in forest land. Full descriptions of the measure are included in Appendix B of this document. Please note, BIO-22 is used as a minimization measure for Agriculture and Forestry Resources and is not considered mitigation for this determination regarding Section 2.1.1.

- BIO-22. Compensatory Mitigation – Riparian Vegetation: Impacts to 0.01-acre of riparian vegetation will be compensated at a 3-to-1 ratio with the establishment of 0.03-acre of riparian vegetation at an undetermined onsite or offsite location.

2.1.3 Air Quality

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

Considering the information in the Air Quality Memorandum dated February 12, 2024, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Air Quality
a) Conflict with or obstruct implementation of the applicable air quality plan?	No Impact

Question—Would the project:	CEQA Significance Determinations for Air Quality
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?	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No Impact

2.1.4 Biological Resources

Considering the information in the Natural Environment Study dated April 15, 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?	Less Than Significant Impact With Mitigation Incorporated
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less Than Significant Impact With Mitigation Incorporated

Question—Would the project:	CEQA Significance Determinations for Biological Resources
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?	Less Than Significant Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact

Affected Environment

This paragraph was updated after the draft environmental document completed circulation to add additional details about biological field surveys conducted for the project impact analysis. The project is located in Alpine County, on the western and eastern slopes of the California Sierra Nevada province. The area typically has warm dry summers and cold winters with occasional snowfall equivalent to 18.7 inches of rain per year. Field reviews were conducted in August and September 2023, as well as July and August 2024, to evaluate drainages, other surface water bodies, vegetation communities, wildlife and fish species, and potential habitat. Field surveys used resource-agency approved protocol methods where appropriate.

The project area has low potential to support migratory bird and raptor nests, tree-roosting bat species, Sierra Nevada yellow-legged frog, Morrison bumble bee, and monarch butterfly. However, these species were not detected during field reviews.

This paragraph has been updated since the publication of the draft environmental document. The area may also support Davy's sedge, subalpine cryptantha, and three-bracted onion, but these plant species were not detected during botanical surveys and have low probability to occur within the project study limits. Some invasive plant species were identified during botanical surveys, including common ragwort, field mustard, and white sweet clover.

This paragraph has been updated since the publication of the draft environmental document. Waters potentially qualifying as waters of the United States or waters of the State of California were observed at fourteen drainage system locations. Of these fifteen, eight locations have the potential to

support ephemeral streams during the rainy season, four locations support intermittent streams, and one location has a wetland at the inlet and an intermittent stream at the outlet. All fourteen of these locations potentially fall under the jurisdiction of the Clean Water Act Sections 401 and 404, as well as California Fish and Game Code Section 1600.

Environmental Consequences

Potentially Jurisdictional Waters

The project is expected to cause approximately 7.67 cubic yards of permanent fill below the top of stream banks that potentially qualify as waters of the United States or waters of the State of California. This permanent fill will occur in an area of approximately 264.51 square feet (0.006-acre, rounded up to 0.01-acre) across multiple ephemeral, intermittent, and perennial streams from culvert end treatments.

The project will also result in approximately 143.29 square feet (0.003-acre) of temporary disturbance in potentially jurisdictional wetlands and waters of the United States from the installation of concrete headwalls at the culvert inlets and outlets at Location 11 on State Route 4, post mile 7.53 and Location 29 on State Route 207, post mile 0.38.

This paragraph was updated after the draft environmental document completed circulation and a location was removed. Additionally, 2,588.83 square feet (0.059-acre, rounded up to 0.10-acre) of these potentially jurisdictional streams will be temporarily disturbed by contractor equipment, crew access, and potential water diversion activities below the top of bank. Notably, the culverts at Location 14 on State Route 4, post mile 8.99, Location 22 on State Route 4, post mile 13.20, and Location 25 on State Route 4, post mile 14.16 are expected to have flowing or standing water during the seasonal in-channel work window and may require the use of temporary cofferdams for water diversion. The installation of the cofferdams is expected to also result in temporary fills of 13.87 cubic yards.

This paragraph was updated after the draft environmental document completed circulation and a location was removed. The project will require the trimming of riparian willow scrub at three culvert locations (Location 25 on State Route 4, post mile 14.16, as well as Location 28 on State Route 207, post mile 0.38 and Location 29 on State Route 207, post mile 1.19). The temporary canopy impacts will total approximately 412.23 square feet. As this will result in temporary impacts to potentially jurisdictional riparian vegetation, a California Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement will be required.

Because of temporary and permanent impacts to wetlands and other waters of the United States, the project will require a Clean Water Act Section 404 permit from the United States Army Corps of Engineers and Section 401

Certifications from both the Lahontan Regional Water Quality Control Board and Central Valley Regional Water Quality Control Board. Because these waters also potentially qualify as waters of the State of California, the project will also require a California Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement.

Impacts to wetlands and waters of the United States, waters of the State of California, and riparian vegetation will be avoided, minimized, and mitigated with the use of the measures outlined in the following section of this document.

Special-Status Plant Species

Davy's sedge and subalpine cryptantha are both listed by the California Native Plant Society as not very threatened. Three-bracted onion is rated by the California Native Plant Society as moderately threatened.

These three plant species have been previously recorded in the California Natural Diversity Database as occurring in the vicinity of the project. However, they were not detected during botanical surveys and have a low probability to occur within the project limits. With the implementation of project avoidance measures discussed in the following section of this document, the project is not anticipated to adversely affect special-status plant species.

Monarch Butterfly

Monarch butterflies are a candidate species for listing under the Federal Endangered Species Act. The California Natural Diversity Database records for monarch butterflies are concentrated along the California coastal ranges, far west of Alpine County. Additionally, no formal surveys were conducted for monarch butterflies, and none were observed during project site visits. The State Route 4 corridor in Alpine County does seasonally support the nectar and milkweed resources needed by monarch butterflies, so the project has the potential to temporarily impact monarch butterflies if it affects nectar or milkweed plants. However, these impacts will be avoided and minimized with the implementation of the measures outlined in the following section of this document.

Morrison Bumble Bee

The Morrison bumble bee has no formal listing or protection status and appears in the California Natural Diversity Database due to their decreasing population trend. The project area is within the historic and current range of the species, with no recorded occurrences within the project limits. While plants potentially foraged by bumble bees do occur in the area, no formal surveys for bumble bees were conducted and none were observed during site visits. The project has the potential to adversely impact plants used as food sources for bumble bees, but the proposed activities are unlikely to result in

take of the Morrison bumble bee with the implementation of the avoidance and minimization measures outlined in the following section of this document.

Sierra Nevada Yellow-Legged Frog

The Sierra Nevada yellow-legged frog is listed as endangered under the Federal Endangered Species Act and threatened under the California Endangered Species Act. Eighteen drainage systems along State Route 4 between the 3.66 and 9.89 post miles fall within the limits of designated critical habitat for the species. However, the majority of these culverts are ephemeral or intermittent stream locations. These locations include the intermittent streams on State Route 4's Location 2 at post mile 3.66, Location 14 at post mile 8.99, and Location 17 at post mile 9.64, as well as the wetland and intermittent stream at Location 11 at post mile 7.53.

Impact analysis for Sierra Nevada yellow-legged frog will involve separate determinations for impacts to the species—through direct impacts and impacts to suitable habitat—and impacts to primary constituents of its designated critical habitats.

Sierra Nevada yellow-legged frogs were not observed at any project location during field surveys. Furthermore, suitable breeding habitat for Sierra Nevada yellow-legged frog is not present in the project area. The Sierra Nevada yellow-legged frog's reproductive cycle involves tadpoles that overwinter for two to four seasons, and their breeding requires plunge pools that persist for that duration. While the project will result in temporary and permanent impacts to intermittent streams within the designated critical habitat area, these streams do not support long-term plunge pools and will not be suitable breeding habitat for these frogs.

The project may result in 3,042.84 square feet of temporary impacts to Sierra Nevada yellow-legged frog upland habitat. This potential upland habitat occurs within a 25-foot buffer from the bank of the intermittent streams along culvert inlet and outlets. The culverts adjacent to this potential upland habitat are located on State Route 4's Location 11 at post mile 7.53, Location 14 at post mile 8.99, and Location 17 at post mile 9.64.

Caltrans Standard Specifications and best management practices will also be included in the construction contract to avoid or minimize other potential impacts from construction. These include standard measures and practices to minimize risk of contaminant or toxic chemical spills, and limit construction noise and vibrations. The following sentence was updated after the draft environmental document completed public circulation. See Section 1.6 for a list of these measures and practices. The project will also be conducted during daylight hours, limited to between 6 a.m. and 6 p.m., and will avoid the use of nighttime artificial lighting that could potentially impact Sierra Nevada yellow-legged frog.

With the implementation of the avoidance and minimization measures outlined in the following section, the project is **not likely to adversely affect** Sierra Nevada yellow-legged frog and is **not expected to result in take** of the species.

The project's potential impacts to primary constituent elements of Sierra Nevada yellow-legged frog designated critical habitat were also assessed. Aquatic habitat requirements for breeding and rearing are not present in the project area, as the intermittent streams in the project area do not support permanent plunge pools. However, aquatic non-breeding habitat is still available in these intermittent streams and may be temporarily or permanently affected by the proposed work. Because potential aquatic non-breeding habitat is present in the project area, associated upland habitat that supports Sierra Nevada yellow-legged frog feeding or movement is also present and may be impacted by the proposed work.

However, the work impacting these primary constituents of designated critical habitat will be limited to Caltrans right-of-way or directly adjacent to the highway. As outlined in Section 1.4.1 of this document, the cut-and-cover culvert replacement method will be favored over the jack-and-bore method to minimize excavation and ground disturbance. Along with the use of the avoidance and minimization measures outlined in the following section, the project is considered **not likely to adversely affect** designated critical habitat for the Sierra Nevada yellow-legged frog.

This paragraph was updated after the draft environmental document completed public circulation. Concurrence on these findings was obtained on April 9, 2024, through a Letter of Concurrence with the United States Fish and Wildlife Service.

Tree-Roosting Bats

The project area may also contain suitable roosting habitat for several tree-roosting bat species. The project work will require vegetation clearing and tree removals which may result in adverse effects to trees occupied by tree-roosting bats. However, with the implementation of avoidance and minimization measures outlined in the following section, the project will not result in the take, as defined by the California Fish and Game Code Section 86, of tree-roosting bats. Caltrans will continue to negotiate appropriate avoidance and minimization strategies with the California Department of Fish and Wildlife during the California Fish and Game Code Section 1600 Agreement permitting process prior to construction.

Migratory Birds and Raptors

Migratory birds and raptors may also attempt to nest in appropriate tree, shrub, or ground habitats in the project area during the nesting season

between February 1 and September 30. However, with the implementation of avoidance and minimization measures outlined in the following section, the project will not result in the take, as defined by the Migratory Bird Treaty Act, of any migratory birds or their nests.

Common Wildlife and Fish Passage

Impacts to fish passage are not anticipated in the project area, as culverts that occur on or near perennial streams were not identified as needing repair within the project limits.

The proposed project impacts will be generally limited to roadway and near-roadway construction and will avoid impacts to natural vegetation communities and habitats supporting common wildlife species to the greatest extent feasible. The project is not expected to result in the take, as defined by Section 86 of the California Fish and Game Code, of common wildlife species.

Invasive Species

The California Department of Fish and Wildlife Invasive Species Program website was reviewed for invasive animal species, and no species were identified that are expected to occur in the project limits. However, botanical surveys identified common ragwort, field mustard, white sweet clover, and annual rabbitsfoot grass as invasive plant species present in the project area.

The project will not introduce new habitat for invasive animal species and will not break new ground that could spread invasive plant species. With the implementation of avoidance and minimization measures and construction best management practices as outlined in the following section, the project will not result in the propagation of invasive plant or animal species.

Avoidance, Minimization, and/or Mitigation Measures

The following avoidance and minimization measures will apply to all biological resources potentially impacted by the proposed project. Full descriptions of these measures are included in Appendix B of this document.

- BIO-1. Environmentally Sensitive Area (ESA) Designation.
- BIO-2. Designated Biologist.
- BIO-3. Containment Measures/Construction Site Best Management Practices.
- BIO-4. Worker Environmental Awareness Training for Construction Personnel.

Potentially Jurisdictional Waters

The following measures will be required to avoid or minimize potential impacts to potential wetlands and waters of the United States, potential waters of the State of California, and riparian vegetation along non-federal waters. Full descriptions of these measures are included in Appendix B of this document.

- BIO-5. Limited Operation Period – In Water Construction Activities.
- BIO-6. Limit Vegetation Removal.
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite.

The following mitigation measures will be required to compensate for impacts to potential wetlands and waters of the United States, potential waters of the State of California, and riparian vegetation along non-federal waters. Full descriptions of these measures are included in Appendix B of this document.

- BIO-21. Compensatory Mitigation – Wetlands and Other Waters of the United States: Loss of 0.01-acre of intermittent and ephemeral streams and 0.003-acre of wetlands potentially qualifying as waters of the United States will be compensated through the purchase of mitigation credits through the Sacramento United States Army Corps of Engineers' and National Fish and Wildlife Foundation's in-lieu fee program.
- BIO-22. Compensatory Mitigation – Riparian Vegetation: Loss of 0.01-acre of riparian vegetation will be compensated at a 3-to-1 ratio with the establishment of 0.03-acre of riparian vegetation at an undetermined onsite or offsite location.

Special-Status Plant Species

The following measure will be required to avoid or minimize potential impacts to special-status plant species. Full descriptions of the measure are included in Appendix B of this document.

- BIO-8. Pre-Construction Surveys – Special-Status Plants.

Special-Status Animal Species

The following measures will be required to avoid or minimize potential impacts to the monarch butterfly. Full descriptions of the measures are included in Appendix B of this document.

- BIO-6. Limit Vegetation Removal.
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite.
- BIO-9. Weed Free Construction Equipment and Vehicles.
- BIO-10. Weed Control During Construction.
- BIO-11. Weed Free Erosion Control and Revegetation Treatments.
- BIO-12. Monarch Butterfly – Pre-Construction Surveys.

The following measures will be required to avoid or minimize potential impacts to the Morrison bumble bee. Full descriptions of the measures are included in Appendix B of this document.

- BIO-6. Limit Vegetation Removal.
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite.
- BIO-9. Weed Free Construction Equipment and Vehicles.
- BIO-10. Weed Control During Construction.
- BIO-11. Weed Free Erosion Control and Revegetation Treatments.
- BIO-13. Bumblebee Hive Avoidance – Pre-Construction Surveys.
- BIO-14. Bumblebee Hive Avoidance – Avoid Active Hives.

The following measures will be required to avoid or minimize potential impacts to the Sierra Nevada yellow-legged frog. Full descriptions of the measures are included in Appendix B of this document.

- BIO-5. Limited Operation Period – In Water Construction Activities.
- BIO-6. Limit Vegetation Removal.
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite.
- BIO-15. Pre-Construction Surveys and Construction Site Biological Monitoring – Sierra Nevada Yellow Legged Frog.

Invasive Species

The following measures will be required to avoid or minimize potential impacts from the spread of invasive species. Full descriptions of the measures are included in Appendix B of this document.

- BIO-9. Weed Free Construction Equipment and Vehicles.
- BIO-10. Weed Control During Construction.
- BIO-11. Weed Free Erosion Control and Revegetation Treatments.

Tree-Roosting Bats

The following measures will be required to avoid or minimize potential impacts to tree-roosting bats. Full descriptions of the measures are included in Appendix B of this document.

- BIO-6. Limit Vegetation Removal.
- BIO-16. Roosting Bat Avoidance – Pre-Construction Surveys.
- BIO-17. Roosting Bat Avoidance – Avoid Active Roosts.

Migratory Birds and Raptors

The following measures will be required to avoid or minimize potential impacts to migratory birds and raptors. Full descriptions of the measures are included in Appendix B of this document.

- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite.
- BIO-18. Nesting Bird Avoidance – Limited Operation Period.
- BIO-19. Nesting Bird Avoidance – Pre-Construction Surveys.
- BIO-20. Nesting Bird Avoidance – Avoid Active Nests.

2.1.5 Cultural Resources

Considering the information in the Historic Property Survey Report dated November 6, 2023, and the Archaeological Survey Report dated November 6, 2023, 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?	Less Than Significant Impact
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	No Impact

Affected Environment

Cultural resource identification efforts on the project included: a review of the Central California Information Center record searches conducted for recent projects in the current project area; a review of the Caltrans Cultural Resources Database; literature review of previously recorded cultural resources identified within the proposed project's area of potential effect; archival historical research of the area; examination of Caltrans bridge as-builts; consultation with the Native American Heritage Commission and local Native American groups and individuals; and a field review.

A field review was conducted of the project's area of potential effect, with a total of 0.54 acres surveyed on foot. The area of potential effect includes an area of direct impact surrounding each of the drainage system locations, the temporary construction easements required at eight locations listed in Section 1.4.1, and the boundaries of the two previously recorded archaeological resources adjacent to the project area. The vertical area of potential effect ranges from three to seven feet, depending on the culvert location. This is to account for the maximum depth of potential ground disturbance work from the proposed culvert repair or replacement.

The cultural resource investigation also involved consultation outreach to the Alpine Community Development Department, Alpine County Museum, Native American Heritage Commission, six representatives from four Native American Tribes, and the United States Forest Service.

Environmental Consequences

The project area of potential effect includes the North Fork Mokelumne River Bridge (Bridge Number 31-0009), which was previously determined not eligible for inclusion in the National Register of Historic Places, as described in the Historic Property Survey Report. The only other built environment resources present in the area of potential effect meet the National Historic Preservation Act Section 106 Programmatic Agreement criteria for properties

exempt from evaluation. As such, the project is expected to have no impacts to built environment historic resources.

No new cultural resources were identified as a result of this study. However, two unevaluated but previously recorded archaeological resources or sites, were identified within the project's area of potential effect.

The project will involve culvert replacements, grading, and other potentially ground-disturbing work within the boundaries of one of the two previously unevaluated archaeological resources. This site will be considered eligible under the National Register of Historic Places Criteria A (Event) and D (Information Potential), due to the site's large size and limited potential for effects. However, archaeological surveys and previously recorded records of the culvert location within the site did not identify any archaeological or cultural deposits in the project's area of direct impact that contribute to the assumed historic eligibility of this site. Vertical and horizontal Environmentally Sensitive Area boundaries will be utilized at this location, along with construction monitoring by an archaeologist and Native American monitor.

The other archaeological site is outside but immediately adjacent to an area of direct impact. It will be considered eligible under the National Register of Historic Places Criterion D for this project only, as it will be protected in its entirety through the establishment of an Environmentally Sensitive Area. This site will require the use of horizontal Environmentally Sensitive Area boundaries.

This paragraph was updated after the draft environmental document completed circulation. The cultural resource impact determination for the project is a Finding of No Adverse Effect without Standard Conditions. Caltrans obtained the State Historic Preservation Officer's concurrence on this determination on November 28, 2023.

Avoidance, Minimization, and/or Mitigation Measures

Impacts to the archaeological sites identified in the project's area of potential effect will be avoided or minimized with the use of the following standard measures. Full descriptions of the measures are included in Appendix B of this document.

- CU-1. Construction monitoring – Archaeologist and Native American Monitor.
- CU-2. Environmentally Sensitive Areas (ESA) Designation – Cultural.
- CU-3. Special procedures for human remains.

2.1.6 Energy

Considering the information in the Alpine County Energy Action Plan dated December 6, 2016, and the Energy Analysis Memorandum dated May 16, 2024, the following significance determinations have been made:

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

2.1.7 Geology and Soils

Considering the information in the Geotechnical Design Support Memorandum dated August 7, 2023, and the Paleontology Memorandum dated August 8, 2023, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Geology and Soils
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No Impact
ii) Strong seismic ground shaking?	No Impact
iii) Seismic-related ground failure, including liquefaction?	No Impact
iv) Landslides?	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	No Impact

Question—Would the project:	CEQA Significance Determinations for Geology and Soils
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

2.1.8 Greenhouse Gas Emissions

Considering the information in the Climate Change Study dated February 20, 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

Affected Environment

The project is in a rural and forested area in Alpine County. State Route 4 is a major transportation route to and through the area. It is primarily used by automobile drivers but also sees considerable use by recreational bicyclists.

Traffic counts are generally low in this area due to the extremely low population density in the region. State Route 4 experiences seasonal changes in transportation use, peaking in the summertime and declining in the winter months due in-part to snow-related closures. Traffic congestion

does occur during both summer and winter months but is usually limited to a few hours on a few peak days a year. State Route 207 connects to State Route 4 in Bear Valley, and exhibits similar use trends to State Route 4, with relatively infrequent traffic congestion.

Environmental Consequences

The purpose of the proposed project is to rehabilitate existing drainage systems and will not increase the vehicle capacity of the roadway. This type of project generally causes minimal or no increase in operational greenhouse gas emissions. As the project will not increase the number of travel lanes on State Routes 4 or 207, no increase in vehicle miles traveled (VMT) will occur. While some emissions during the construction period will be unavoidable, no increase in operational greenhouse gas emissions is expected.

Construction emissions for the project were calculated using the Caltrans' Construction Emissions Tool (CALCET v1.1). Project construction is expected to generate approximately 662 tons of carbon dioxide during the 120 working days duration.

Avoidance, Minimization, and/or Mitigation Measures

Standard conditions and best management practices will be implemented to reduce or eliminate construction Greenhouse Gas emissions. All construction contracts include Caltrans Standard Specifications Section 7-1.02A and 7 1.02C: Emissions Reduction, which require contractors to comply with all laws applicable to the project and to certify they are aware of and will comply with all California Air Resources Board emission reduction regulations. Additionally, Section 14-9.02: Air Pollution Control, requires contractors to comply with all air pollution control rules, regulations, ordinances, and statutes.

Additionally, the following project-specific measures will be included to reduce greenhouse gas emission impacts from temporary construction activities. Full descriptions of the measures are included in Appendix B of this document.

- GHG-1. Limit equipment idling.
- GHG-2. Schedule truck trips.
- GHG-3. Equipment fuel efficiency.
- GHG-4. Construction environmental training.

2.1.9 Hazards and Hazardous Materials

Considering the information in the Initial Site Assessment dated February 1, 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?	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact

2.1.10 Hydrology and Water Quality

Considering the information in the Preliminary Hydraulics Floodplain Analysis dated December 14, 2020, Preliminary Floodplain Study Addendum dated April 2, 2024, and the Water Compliance Study dated December 20, 2022, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Hydrology and Water Quality
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation onsite or offsite;	No Impact
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding onsite or offsite;	No Impact
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	No Impact
(iv) impede or redirect flood flows?	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No Impact

2.1.11 Land Use and Planning

Considering the information in the Community Impact Memorandum dated January 23, 2025, the following significance determinations have been made:

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

2.1.12 Mineral Resources

Considering the information in the Geotechnical Design Support Memorandum dated August 7, 2023, the following significance determinations have been made:

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

2.1.13 Noise

Considering the information in the Noise Compliance Study dated January 20, 2023, the following significance determinations have been made:

Question—Would the project result in:	CEQA Significance Determinations for Noise
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	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

2.1.14 Population and Housing

Considering the information in the Community Impact Memorandum dated January 23, 2025, the following significance determinations have been made:

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

2.1.15 Public Services

Considering the information in the Community Impact Memorandum dated January 23, 2025, the following significance determinations have been made:

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

2.1.16 Recreation

Considering the information in the Community Impact Memorandum dated January 23, 2025, and the Alpine County General Plan dated March 2017, the following significance determinations have been made:

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?	Less than Significant Impact

Affected Environment

The project will involve drainage system improvements along State Routes 4 and 207, with the majority of work occurring within Caltrans right-of-way. As

noted in Section 1.4.1 of this environmental document, the project will also require eight temporary construction easements from the United States Forest Service for work adjacent to Caltrans right-of-way.

Of the 29 proposed project locations, 17 locations are within 0.5 miles of United States Forest Service recreational resources, including multiple campgrounds and hiking trails in the vicinity of Lake Alpine, Mosquito Lakes, and North Fork Mokelumne River. For a full list of the recreational resources in the vicinity of the project, see Appendix C of this document.

Environmental Consequences

The following section and list of traffic control requirements have been updated since the publication of the draft environmental document as a result of Section 4(f) consultation with the Stanislaus National Forest. The drainage system improvements will involve ground disturbance, temporary lane closures, and construction noise and vibration in the vicinity of multiple recreational resources.

However, the project will result only in minor, indirect, or temporary impacts to recreational resources during the 120-day construction working period. Public access along State Route 4 and 207 in the project area will not be blocked or impeded by the proposed work for the majority of project locations, as one traffic-through lane will be maintained throughout construction where feasible. Full closures will be required for Locations 2 through 11, where State Route 4 narrows to one shared lane. However, work at these locations will comply with traffic management recommendations from the U.S. Forest Service, to minimize impacts to the traveling public and National Forest visitors.

Construction work and lane closures will also be limited to weekdays, which will limit impacts to the public during the weekend peak periods of travel and recreational use. Where full closures are necessary, Caltrans will comply with the requirements listed in the following section below, including measures TC-1, TC-2, and TC-3. Additional discussion of these requirements can be found in Appendix C of this environmental document.

Additionally, construction impacts will also be temporary in nature, as the work at each location will average only four working days and any vegetation removed will be replanted after construction.

Avoidance, Minimization, and/or Mitigation Measures

The following measures from the 2024 Caltrans Standard Specifications included with the project will reduce potential impacts to recreational resources.

- Section 4-1.13: Scope of Work—Cleanup

- Section 10-5: Dust Control
- Section 13: Water Pollution Control
- Section 14-8: Noise Control
- Section 14-9.02: Air Pollution Control

The following avoidance and minimization measures will also reduce potential impacts to recreational resources. Full descriptions of these measures can be found in Appendix B of this document. Please note, BIO-21 and BIO-22 are used as minimization measures for recreational resources and are not considered mitigation for this determination regarding Section 2.1.16.

- BIO-3. Containment Measures/Construction Site Best Management Practices
- BIO-5. Limited Operation Period – In Water Construction Activities
- BIO-6. Limit Vegetation Removal
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite
- BIO-21. Compensatory Mitigation – Wetlands and Other Waters of the United States
- BIO-22. Compensatory Mitigation – Riparian Vegetation
- CU-2. Environmentally Sensitive Areas (ESA) Designation – Cultural
- TC-1. Full closure timing restrictions.
- TC-2. Traffic control schedule.
- TC-3. Traffic control specifications.

The project will also involve indirect improvements to recreational resources in the project area. Drainage system repair and replacements will improve road stability and reduce the likelihood of roadway flooding or collapse that could block public access to recreational areas.

As such, the potential impacts to recreational resources are anticipated to be less than significant.

2.1.17 Transportation

This section was updated after the draft environmental document completed public circulation to reflect the updated significance determination of “Less than Significant Impact” to emergency services, previously listed as “No Impact”. Considering the information in the Community Impact Memorandum dated January 23, 2025 and the Alpine County Regional Transportation Plan dated February 2021, the following significance determinations have been made:

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?	Less than Significant Impact

Affected Environment

The project will involve drainage system improvements along State Routes 4 and 207 in Alpine County, with the majority of work occurring within Caltrans right-of-way. The area is mountainous and forested, and a majority of vehicle travel through the area is to access local recreational resources, including Stanislaus National Forest, Lake Alpine, North Fork Mokelumne River, and Bear Valley.

Both State Route 4 and 207 in the project area are two-lane highways, with the exception of the area between post miles 3.25 and 7.70 of State Route 4, near Lake Alpine. This portion of the highway narrows into one shared lane and affects the traffic management strategy for work proposed at project Locations 2 through 11.

Environmental Consequences

This paragraph has been updated since the publication of the draft environmental document to reflect the reduced working period at each location, now estimated to be one to two days per location rather than four. The drainage system improvements will involve temporary lane closures along State Routes 4 and 207, as well as a smaller portion of full road closures along State Route 4. However, the project will result only in temporary impacts to transportation access, as work at each location is only anticipated to take one to two days. Furthermore, the project will only temporarily affect the area during construction and will not involve any long-term operational changes to the roadway capacity.

Public access along State Route 4 and 207 in the project area will not be blocked by the proposed work for the majority of project locations, as one traffic-through lane will be maintained throughout construction where feasible. Full closures, where necessary, will comply with the avoidance and minimization measures listed below, as provided by the U.S. Forest Service and agreed upon by Caltrans. Interagency coordination will continue through construction to ensure minimal impacts to the traveling public and National Forest visitors:

Caltrans will coordinate with the U.S. Forest Service, California Highway Patrol (CHP), and emergency service providers during finalization of the Traffic Management Plan (TMP) to ensure minimal impacts to public access, recreational travel, and emergency response times.

Avoidance, Minimization, and/or Mitigation Measures

With the inclusion of the below traffic control requirements, as well as coordination with the U.S. Forest Service, California Highway Patrol (CHP), and local emergency service providers, the project is expected to have only temporary, less than significant impacts to transportation or emergency access. Full descriptions of these measures can be found in Appendix B.

- TC-1. Full closure timing restrictions.
- TC-2. Traffic control schedule.
- TC-3. Traffic control specifications.

2.1.18 Tribal Cultural Resources

Considering the information in the Historic Property Survey Report dated November 6, 2023, and the Archaeological Survey Report dated November 6, 2023, the following significance determinations have been made:

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

Question:	CEQA Significance Determinations for Tribal Cultural Resources
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	Less Than Significant Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less Than Significant Impact

Affected Environment

As described in Section 2.1.5 of this document, cultural resource identification efforts on the project included a review of several databases and record searches of the current project area, of the area of potential effect, and a field review.

The cultural resource investigation also involved consultation outreach to the Native American Heritage Commission and six representatives from four Native American Tribes. Additional information about consultation efforts is contained in Chapter 3 of this document.

Environmental Consequences

No new cultural resources were identified as a result of the cultural studies referenced in this document. However, as mentioned in Section 2.1.5, there were two unevaluated, but previously recorded archaeological resources identified within the project's area of potential effect.

The project work will involve culvert replacements, grading, and other potentially ground-disturbing work within the boundaries of one of the two archaeological sites. This site will be considered eligible under the National Register of Historic Places Criteria A (Event) and D (Information Potential), due to the site's large size and limited potential for effects. The surveys and

testing efforts of the area around the culvert did not identify any archaeological or cultural deposits in the project's area of direct impact that contribute to the assumed historic eligibility of this site. Vertical and horizontal Environmentally Sensitive Area boundaries will be utilized at this location, along with construction monitoring by an archaeologist and Native American monitor.

The other archaeological site is outside but immediately adjacent to an area of direct impact. It will be considered eligible under the National Register of Historic Places Criterion D for this project only, as it will be protected in its entirety through the establishment of an Environmentally Sensitive Area. This site will require the use of horizontal Environmentally Sensitive Area boundaries.

Avoidance, Minimization, and/or Mitigation Measures

Impacts to the tribal cultural resources will be avoided or minimized with the use of the following standard measures. Full descriptions of these measures are included in Appendix B of this document.

- CU-1. Construction monitoring – Archaeologist and Native American Monitor.
- CU-2. Environmentally Sensitive Areas (ESA) Designation – Cultural.
- CU-3. Special procedures for human remains.

2.1.19 Utilities and Service Systems

Considering the information in the Water Compliance Study dated December 20, 2022, and the Initial Site Assessment dated February 1, 2024, the following significance determinations have been made:

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

Question—Would the project:	CEQA Significance Determinations for Utilities and Service Systems
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

2.1.20 Wildfire

Considering the information in the Community Impact Memorandum dated January 23, 2025, the following significance determinations have been made:

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

Question—Would the project:	CEQA Significance Determinations for Wildfire
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or	No Impact

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

2.1.21 Mandatory Findings of Significance

This section was updated after the draft environmental document completed public circulation to reflect the updated significance determination of “Less than Significant Impact” to question c) below.

Question:	CEQA Significance Determinations for Mandatory Findings of Significance
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	Less than Significant Impact with Mitigation Incorporated
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than Significant Impact

Affected Environment

The project will affect environmental resources in the vicinity of State Route 4 in Alpine County from post miles 2.12 to 14.61 and State Route 207 in Alpine County from post miles 0.38 to 1.19. However, the scope of work is limited, and work will be limited mostly to Caltrans right-of-way. Temporary construction easements on United States Forest Service land will be needed at seven of the thirty project locations. See Section 1.4.1 for these locations. Project work consists of rehabilitating existing drainage systems that need to be repaired in order to maintain the integrity of the roadway.

Environmental Consequences

The following paragraph has been updated since publication of the draft environmental document to reflect the full road closures required from Locations 2 through 11 that would result in less than significant impacts to recreation and transportation. The project may cause impacts to aesthetics, cultural resources, forest resources, greenhouse gas emissions, recreation, transportation, and tribal cultural resources. With the implementation of avoidance and minimization measures as discussed in Chapter 2, the effects of these impacts will be less than significant.

The project may also impact forest resources and biological resources, but with the implementation of avoidance, minimization, and mitigation measures as discussed in Chapter 2, the effects will be less than significant with mitigation incorporated.

Avoidance, Minimization, and/or Mitigation Measures

With the implementation of avoidance, minimization, and mitigation measures, the project will have a less than significant impact on the natural and human environment. All other impacts will be minimized through the implementation of Caltrans best management practices, Standard Specifications, and Standard Special Provisions. Therefore, the project will not have a significant impact on aesthetics, cultural resources, forest resources, greenhouse gas emissions, recreation, transportation, and tribal cultural resources. A full list of avoidance, minimization, and mitigation measures can be found in Appendix B of this document.

Chapter 3 Coordination

Coordination with the following agencies was conducted as part of the preparation of technical studies for this environmental document.

Biological Resources Consultation

This paragraph has been updated to reflect receipt of the U.S. Fish and Wildlife Service Letter of Concurrence. On February 22, 2024, a Biological Assessment for the project was sent to the District Supervisor of the Southern Sierra Division of the United States Fish and Wildlife Service, as part of the Federal Endangered Species Act Section 7 informal consultation process. The Letter of Concurrence was obtained from the United States Fish and Wildlife Service on April 9, 2024.

Cultural and Native American Tribal Consultation

On February 14, 2023, the Caltrans architectural historian sent a letter to the Director of the Alpine Community Development Department to inform them of the project and request any available information regarding cultural resources within the project's area of potential effect. No response has been received to date.

On February 14, 2023, the Caltrans architectural historian also sent a letter to the Alpine County Museum to inform them of the project and request any available information regarding cultural resources within the project's area of potential effect. No response has been received to date.

A sacred lands file search request was sent to the Native American Heritage Commission on May 26, 2023. A letter response was received on June 26, 2023, from the Cultural Resources Analyst of the Native American Heritage Commission. The response letter reported a negative record search of their Sacred Lands Inventory file and included a Native American contact list.

The Caltrans District Native American Coordinator emailed consultation outreach letters to representatives of the following Native American groups on September 7, 2022, and May 31, 2023:

- Wilton Rancheria
- Chicken Ranch Rancheria of Me-Wuk Indians
- Nashville Enterprise Miwok-Maidu-Nishinam Tribe
- Washoe Tribe of Nevada and California

On August 14, 2023, the Caltrans Professionally Qualified Staff archaeologist contacted the Forest Heritage Resource and Tribal Relations Program Manager for the Stanislaus National Forest regarding cultural resources located on Forest Service-owned land in the project vicinity. They responded with a Forest Service records for sites near the project area.

The Caltrans archaeologist responded to the Forest Heritage Resource and Tribal Relations Program Manager by providing a draft copy of the Archaeological Survey Report and maps of the area of potential effects, along with the results of a Central California Information Center records search, which the Forest Heritage Resource and Tribal Relations Program Manager approved. Consultation with the Forest Service for archaeological and Native American Tribal resources in the project vicinity is ongoing.

The Historical Resources Survey Report was submitted to the Caltrans Cultural Studies Office for review on November 6, 2023, and it was approved on November 14, 2023. The approved report was then sent to the State Historic Preservation Officer on November 14, 2023, and the State Historic Preservation Officer provided their concurrence on November 28, 2023.

Section 4(f) and United States Forest Service Consultation

[This Section 4(f) discussion has been added after the publication of the draft environmental document.] On September 25, 2024, copies of the Notice of Intent to Adopt a Mitigated Negative Declaration and Section 4(f) De Minimis Determination were mailed to the Stanislaus National Forest Supervisor's Office at 19777 Greenley Road Sonora, California 95370, and the Humboldt-Toiyabe National Forest Headquarters at 1200 Franklin Way, Sparks, Nevada 89431. No comments were received from the U.S. Forest Service during the public comment period.

On November 4, 2024, an email was sent to the Lands and Realty Management Office at the U.S. Forest Service, to notify the agency of the project and the Section 4(f) concurrence request. No response was received. Several phone call attempts were made to the Stanislaus National Forest Headquarters, Stanislaus National Forest Calaveras Office, and the Humboldt-Toiyabe National Forest Headquarters in an effort to discuss the need for Section 4(f) concurrence. On November 15, 2024, Ryo Nakamura answered the phone for the Humboldt-Toiyabe National Forest. After the phone discussion on November 15, 2024, Section 4(f) concurrence request emails were sent to Ryo Nakamura and Gabriela Yanez at the Humboldt-Toiyabe National Forest and Todd Newburger at the Stanislaus National Forest.

Email and phone coordination continued between Caltrans and Gabriela Yanez until December 4, 2024, when it became apparent that the removal of the location on State Route 4, post mile 30.37 (previously referred to as

Location 28 in the draft environmental document), from the project scope meant the project would no longer fall within the boundaries of the Humboldt-Toiyabe National Forest. An email was sent to Gabriela Yanez on December 4, 2024 to discuss the end of the interagency coordination, and she concurred that the project no longer required Section 4(f) concurrence from Humboldt-Toiyabe National Forest.

Coordination with the Stanislaus National Forest continued after the initial November 15, 2024, email to Todd Newburger. However, on November 21, 2024, Todd Newburger informed the Caltrans generalist that the U.S. Forest Service would not concur with the Section 4(f) de minimis determination unless Caltrans implemented specific traffic control requirements to align with another nearby project. The generalist requested a list of these traffic requirements in order to discuss them with the Caltrans project development team. Another request was sent on December 2, 2024, including a request for an interagency meeting to discuss the project.

The request was elevated to the Caltrans Environmental Branch Chief Laura Cook on December 4, 2024, and Laura Cook called Todd Newburger on December 5, 2024, to discuss the issue. The list of traffic control requirements was then provided to Caltrans via email on December 5, 2024. Upon discussion with the Project Manager and Project Engineer, it was determined that Caltrans will be able to comply with the majority of the traffic control requirements, with the exception of one measure calling for the construction sites to be reopened to traffic for one lunchtime hour. After discussion with the project development team, Caltrans determined this measure would be unsafe for both workers and the public.

A revised Section 4(f) concurrence request was sent to the U.S. Forest Service via email on December 17, 2024, agreeing to all traffic control recommendations except for the one-hour reopening. The U.S. Forest Service provided their Section 4(f) concurrence on January 13, 2025. See Appendix D for written concurrence.

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 2023

NON-DISCRIMINATION POLICY STATEMENT

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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.

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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'.

TONY TAVARES
Director

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

Appendix B Avoidance, Minimization, and Mitigation Measures

The following measures will avoid or minimize the project's potential impacts to biological resources as discussed in Section 2.1.4 of this document.

- **BIO-1. Environmentally Sensitive Area (ESA) Designation:** All areas outside of the proposed construction footprint or determined by a qualified biologist shall be considered as Environmentally Sensitive Areas and will be implemented as a first order of work and remain in place until all construction activities are complete. Environmentally Sensitive Area information will be shown on contract plans and discussed in Section 14-1.02 of the Caltrans 2024 Standard Specifications or any Special Provisions in Section 14-1.02. Temporary high visibility fencing (THVF) and signage will be included in the Standard Special Provisions for the project to delineate the Environmentally Sensitive Area (ESA) boundaries during construction. Contractor encroachment into Environmentally Sensitive Areas will be prohibited. If they are breached, immediate work stoppage and notification to the Caltrans resident engineer is required.
- **BIO-2. Designated Biologist:** One or more designated biologists with demonstrated field experience working with the regulated species or performing the specialized task and regulatory agency approval shall be on-site and monitoring any activities that have the potential to affect sensitive biological resources. They will immediately notify the Caltrans resident engineer of any take of regulated species, disturbances to regulated habitats, or breaches of Environmentally Sensitive Areas, and will prepare, submit, and sign notifications and reports. If the contractor supplies the biologist instead of Caltrans, Section 14-6.03D(1-3) of the Caltrans 2024 Standard Specifications or any Special Provisions in Section 14-6.03D(1-3) will specify the necessary qualifications, responsibilities, and submittals. Contractor-supplied biologists will prepare a "Natural Resources Protection Program" within 7 days of contract approval and must have it approved by Caltrans prior to the onset of construction activities.
- **BIO-3. Containment Measures/Construction Site Best Management Practices:** In order to contain construction related material, prevent debris and pollutants from entering receiving waters, and reduce the potential for discharge to receiving waters, the contractor shall follow all applicable guidelines and requirements in Section 13, Water Quality of the Caltrans 2024 Standard Specifications or any Special Provisions in Section 13 regarding water pollution control.

The project design team may specify best management practices to be utilized during construction in addition to, or in place of, other temporary measures selected by the contractor. Prior to construction, the contractor will be required to submit either a Water Pollution Control Plan or a Stormwater Pollution Prevention Plan, as appropriate, for Caltrans review prior to construction onset. Caltrans staff and the contractor are required to perform routine inspections of the construction area to verify that field best management practices are properly implemented, maintained, and are operating effectively and as designed.

- **BIO-4. Worker Environmental Awareness Training for Construction Personnel:** Before any work occurs in the project area, a qualified designated biologist will conduct a mandatory contractor/worker environmental awareness training for construction personnel. The training will be provided to both contractors and subcontractors to brief them on the need to avoid and minimize effects to sensitive biological resources and the penalties for not complying with applicable state and federal laws and permit requirements. If a contractor-supplied biologist is used, then they will prepare and submit copies of the worker environmental awareness training and any associated training materials for Caltrans' review and approval prior to the onset of project construction activities, as per Caltrans 2024 Standard Specifications Section 14-6.03(D).
- **BIO-5. Limited Operation Period – In Water Construction Activities:** It is proposed that construction activities occurring at sites determined as potentially jurisdictional waters of the United States and waters of the State of California shall occur between June 1st and October 15th of any construction season, unless earlier or later dates for in channel construction activities are approved by California Department of Fish and Wildlife and the United States Fish and Wildlife Service.
- **BIO-6. Limit Vegetation Removal:** Clearing of herbaceous vegetation and/or trimming of woody vegetation may be required at some locations for culvert replacement activities. Vegetation removal shall be limited to the absolute minimum amount required for construction.
- **BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite:** Disturbed areas within the construction limits will be graded to minimize surface erosion and siltation into receiving waters. Disturbed areas will be re-contoured to as close to pre-project condition as practicable and will be stabilized as soon as feasible as (and no later than October 15th of each construction season) to avoid erosion during subsequent storms and runoff. Permanent erosion control seeding will

be performed at all disturbed sites by hydro-seeding over the course of construction as each site is completed, with all sites seeded by the completion of construction activities.

- **BIO-8. Pre-Construction Surveys – Special-Status Plants:** The qualifications of any proposed biological monitor(s) will be presented to the California Department of Fish and Wildlife for review and written approval at least 2 weeks prior to conducting project activities at the project site. No more than 24 hours prior to any ground disturbance in a given location, pre-construction surveys will be conducted by a California Department of Fish and Wildlife-approved biologist for sensitive plant species using California Department of Fish and Wildlife-approved survey protocols. If sensitive plant species are detected within areas that will be disturbed by construction activities, then no work will take place at these locations until Caltrans has consulted with the California Department of Fish and Wildlife. New sightings of sensitive plant species shall be reported to the California Natural Diversity Database. A copy of the reporting form and a topographic map clearly marked with the location of where the sensitive plant species were observed should also be provided to the California Department of Fish and Wildlife.
- **BIO-9. Weed Free Construction Equipment and Vehicles:** To minimize the potential for the transport of weed propagules to the project area from sources outside of the project area, construction equipment and vehicles are recommended to be cleaned and washed at the contractor's facilities prior to arrival to the construction site. Any vehicle or equipment cleaning that occurs on-site during construction activities shall conform with Caltrans 2024 Standard Specifications or any Special Conditions under Section 13-4.03E(3) and Section NS-08 (Vehicle and Equipment Cleaning) of the Caltrans 2017 Construction Site Best Management Practices Manual, which require the contractor to contain and dispose of any waste resulting from vehicle or equipment cleaning.
- **BIO-10. Weed Control During Construction:** To minimize the potential for spreading weed propagules originating from within the project environmental study limits during the course of construction activities, including initial vegetation clearing and at onsite revegetation areas, weed control will be accomplished in accordance with Caltrans 2024 Standard Specifications or Special Provisions under Section 20-1.03C(3). The use of herbicides for weed control activities will be discouraged but may be considered on a case-by-case basis depending upon the weed species, the extent of infestation, or any regulatory restrictions.

- **BIO-11. Weed Free Erosion Control and Revegetation Treatments:** To minimize the risk of introducing weed propagules to the project area from sources outside of the project area, only locally adapted plant species appropriate for the project area will be used in any erosion control or revegetation seed mix or stock. The Caltrans biologist will consult with the Caltrans landscape architect to develop appropriate seed and planting palettes for use in revegetation and/or erosion control applications. Any compost, mulch, fiber, duff, tackifier, straw, topsoil, erosion control products, or seed must meet Caltrans 2024 Standard Specification or any Special Provisions under Section 21-2.02 for these materials. Any hydroseed used for revegetation activities must also be certified weed free as per Caltrans 2024 Standard Specifications Section 21-2.02F.
- **BIO-12. Monarch Butterfly – Pre-Construction Surveys:** The qualifications of any proposed biological monitor(s) will be presented to the United States Fish and Wildlife Service for review and written approval at least 2 weeks prior to conducting project activities at the project site. A United States Fish and Wildlife Service-approved biologist will be present during all construction-related activities that may affect bumblebee hives or monarch butterflies. Prior to any construction activities, a focused survey for all life stages of monarch butterfly shall be conducted by a qualified biologist within 7 days prior to the beginning to project-related activities. Pre-construction surveys for bumblebee hives shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection). Any observation of any life stage of monarch butterfly, including breeding, will be reported to the western monarch butterfly mapper or via iNaturalist (http://xerces.org/milkweed_survey/).
- **BIO-13. Bumblebee Hive Avoidance – Pre-Construction Surveys:** The qualifications of any proposed biological monitor(s) will be presented to the California Department of Fish and Wildlife for review and written approval at least 2 weeks prior to conducting project activities at the project site. A California Department of Fish and Wildlife-approved biologist will be present during all construction-related activities that may affect bumblebee hives. Prior to any ground-breaking activities, a focused survey for bumblebee hives shall be conducted by a qualified biologist within 7 days prior to the beginning to project-related activities. Pre-construction surveys for bumblebee hives shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection).
- **BIO-14. Bumblebee Hive Avoidance – Avoid Active Hives:** If active bumblebee hives found, a protective no-work buffer of 20 feet will be established and Caltrans shall consult with California Department of Fish and Wildlife to comply with provisions of the Fish and Game Code

of California. Protective buffers for bumblebee hives shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection). No work will commence within the buffer until authorization is received from the resident engineer. If construction requires activities that may potentially cause hive destruction or hive abandonment, monitoring of the hive site by a qualified biologist will be required to ensure that protective radii are maintained.

- **BIO-15. Pre-Construction Surveys and Construction Site Biological Monitoring – Sierra Nevada Yellow Legged Frog:** -The qualifications of any proposed biological monitor(s) will be presented to the United States Fish and Wildlife Service and California Department of Fish and Wildlife for review and written approval at least 2 weeks prior to conducting project activities at the project site. A United States Fish and Wildlife Service and California Department of Fish and Wildlife-approved biologist will be present during all construction-related activities that may affect Sierra Nevada yellow-legged frogs or their habitats. The approved biologist will have the authority to halt work through coordination with the resident engineer or onsite project manager in the event that a Sierra Nevada yellow-legged frog observed on the project footprint.

The resident engineer or onsite project manager will ensure construction activities remain suspended in any area where the biologist has determined that take of the Sierra Nevada yellow-legged frog could occur. Work will resume once the animal leaves the site of its own volition, once it is determined that the frog is not being harassed by or in danger due to construction activities. If a Sierra Nevada yellow-legged frog is observed in the work area, the United States Fish and Wildlife Service and California Department of Fish and Wildlife-approved biologist(s) will notify the United States Fish and Wildlife Service and California Department of Fish and Wildlife contact by telephone and electronic mail within twenty-four hours of the initial observation.

No more than 24 hours prior to any ground disturbance at a given location, preconstruction surveys will be conducted by a United States Fish and Wildlife Service and California Department of Fish and Wildlife-approved biologist for Sierra Nevada yellow-legged frogs using United States Fish and Wildlife Service and California Department of Fish and Wildlife-approved survey protocols. These surveys will consist of walking surveys of the project limits and accessible adjacent areas within at least 50 feet of the project limits. The biologist(s) will investigate all potential Sierra Nevada yellow-legged frog cover sites. This includes thorough investigation of mammal burrows, appropriately soil cracks, and debris. Native vertebrates found in the cover sites will

be documented and, if appropriate, relocated to an adequate cover site in the vicinity. The entrances and other refuge features within the project limits will be collapsed or removed following investigation and clearance.

New sightings of Sierra Nevada yellow-legged frogs shall be reported to the California Natural Diversity Database. A copy of the reporting form and a topographic map clearly marked with the location of where the Sierra Nevada yellow-legged frog was observed should also be provided to the United States Fish and Wildlife Service and California Department of Fish and Wildlife.

To the extent practicable, initial ground-disturbing activities will be avoided between October 16 and May 31 to avoid the period when adult Sierra Nevada yellow-legged frogs are most likely to be in torpor. When ground-disturbing activities must take place between October 16 and May 31, daily monitoring by a United States Fish and Wildlife Service-approved biologist(s) will occur for Sierra Nevada yellow-legged frogs.

If pumping is used for dewatering, intakes will be completely screened with wire mesh no larger than 0.2-inch to prevent any tadpoles from entering the pump. To prevent the inadvertent entrapment of the Sierra Nevada yellow-legged frog, all excavated, steep-walled holes or trenches more than 6 inches deep will be covered at the close of each working day by plywood or similar materials. If it is not feasible to cover an excavation, one or more escape ramps constructed of earthen fill or wooden planks will be installed. Before such holes or trenches are filled, they must be thoroughly inspected for trapped animals. If at any time a trapped animal is discovered, the biologist will immediately place escape ramps or other appropriate structures to allow the animal to escape, or the United States Fish and Wildlife Service and California Department of Fish and Wildlife will be contacted by telephone for guidance. The United States Fish and Wildlife Service and California Department of Fish and Wildlife will be notified of the incident by telephone and email within one working day.

The following construction best management practices will also avoid or minimize impacts to Sierra Nevada yellow-legged frog. During construction operations, stockpiling of construction materials, portable equipment, vehicles, and supplies will be restricted to the designated construction staging areas and all operations will be confined to the minimal area necessary. Project-related vehicle traffic will be restricted to established roads and construction areas. Access roads will be constructed to the minimum amount necessary. Project vehicles will observe a 20-mile-per-hour speed limit while in the action area. Dust

control measures will be implemented if necessary. Plastic mono-filament netting (erosion control matting) or similar material will not be used at the project site. Acceptable substitutes include coconut coir matting or tackified hydro-seeding compounds. Use of rodenticides and herbicides, including fumigation, the use of poison bait, or other means of poisoning nuisance animals in project areas shall be restricted. All food-related trash items such as wrappers, cans, bottles, and food scraps should be disposed of in securely closed containers and removed at least once a week from a construction or project site. No firearms shall be allowed on the project site. No pets, such as dogs or cats, should be permitted on the project site.

- **BIO-16. Roosting Bat Avoidance – Pre-Construction Surveys:** The qualifications of any proposed biological monitor(s) will be presented to the California Department of Fish and Wildlife for review and written approval at least 2 weeks prior to conducting project activities at the project site. A California Department of Fish and Wildlife-approved biologist will be present during all construction-related activities that may affect tree-roosting bats or their habitats. Prior to any tree removal activities, a focused survey for tree-roosting bats shall be conducted by a qualified biologist within 15 days prior to the beginning of project-related activities. If a lapse in project related work of 15 days or longer occurs, another survey and, if required, consultation with California Department of Fish and Wildlife will be required before the work can be reinitiated. Pre-construction surveys for tree-roosting bats shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection).
- **BIO-17. Roosting Bat Avoidance – Avoid Active Roosts:** If active day roosts or maternity roosts are found, a protective no-work buffer of 50 feet will be established and Caltrans shall consult with California Department of Fish and Wildlife to comply with provisions of the Fish and Game Code of California. Protective buffers for tree-roosting bats shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection). No work will commence within the buffer until authorization is received from the resident engineer. During construction activities that may potentially cause roost destruction or roost abandonment, monitoring of the nest site by a qualified biologist will be required to ensure that protective radii are maintained.
- **BIO-18. Nesting Bird Avoidance – Limited Operation Period:** Performing ground-disturbance, vegetation removal, or other construction activities within nesting bird habitat during the non-nesting season (between October 1st and January 31st) will not require preconstruction surveys or nesting bird avoidance measures.

- **BIO-19. Nesting Bird Avoidance – Pre-Construction Surveys**
During Nesting Season: If ground-disturbance, vegetation removal, or other construction activities are scheduled during the nesting season of protected raptors and migratory birds (February 1st to September 30th), a focused survey for active nests of such birds shall be conducted by a qualified biologist within 15 days prior to the beginning to project-related activities. If a lapse in project related work of 15 days or longer occurs, another survey and, if required, consultation with United States Fish and Wildlife Service and California Department of Fish and Wildlife will be required before the work can be reinitiated. Pre-construction surveys for nesting migratory birds and raptors shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection) and/or 14-6.03(B) (Bird Protection).
- **BIO-20. Nesting Bird Avoidance – Avoid Active Nests:** If active nests are found, a protective no-work buffer will be established and Caltrans shall consult with United States Fish and Wildlife Service regarding appropriate action to comply with the Migratory Bird Treaty Act of 1918 and with California Department of Fish and Wildlife to comply with provisions of the Fish and Game Code of California. If nesting migratory birds or nesting raptors are detected by the designated biologist during the pre-construction survey, the appropriate no-work buffer will be established around the nest. No work will commence within the buffer until authorization is received from the resident engineer.

The appropriate no-work buffer for raptors will be 300 feet in radius, and for other migratory birds the radius will be 100 feet. Protective buffer radii for nesting migratory birds and raptors shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection) and/or 14-6.03B (Bird Protection). If construction or other project related activities which may potentially cause nest destruction, nest abandonment or forced fledging of migratory birds are necessary, monitoring of the nest site by a qualified biologist will be required to ensure that protective radii are maintained.

The following compensatory mitigation measures will also be required to mitigate for impacts to riparian vegetation, as discussed in Section 2.1.4 of this document.

- **BIO-21. Compensatory Mitigation – Wetlands and Other Waters of the United States:** Construction of the proposed project is expected to result in the permanent loss of up to approximately 370.50 square feet (0.0085-acre rounded to 0.01-acre) of intermittent and ephemeral streams and 143.29 square feet (0.003-acre) of wetlands potentially

qualifying as waters of the United States.

The permanent loss of potentially jurisdictional waters of the United States is proposed to be compensated by Caltrans' participation in the Sacramento United States Army Corps of Engineers' and National Fish and Wildlife Foundation's in-lieu fee program to ensure no net loss of functions and values of potentially jurisdictional waters of the United States. The program operates by making available mitigation credits for purchase by permittees (with the approval of the applicable regulatory agencies), and the credits may be used to satisfy the compensatory mitigation requirements applicable to such permittees for their impacts to aquatic resources. Credits will be purchased in the Cosumnes/Mokelumne Rivers Watershed Service Area, the Calaveras/Stanslaus Rivers Watershed Service Area, and the Carson/Walker Rivers Aquatic Service Area.

- **BIO-22. Compensatory Mitigation – Riparian Vegetation:** Construction of the proposed project is expected to result in the trimming or removal of 0.01-acre of mainly streamside montane riparian willow scrub but may include black cottonwood and alder riparian vegetation. This loss of riparian vegetation is expected to require a 3-to-1 compensation ratio by the California Department of Fish and Wildlife. Caltrans therefore proposes to compensate for the loss of 0.01-acre of riparian vegetation with the establishment of 0.03-acre of riparian vegetation at an undetermined onsite (within the project limits) or offsite location.

The following measures will avoid or minimize the project's potential impacts to archaeological resources and tribal cultural resources, as discussed in Sections 2.1.5 and 2.1.18 of this document.

- **CU-1. Construction monitoring – Archaeologist and Native American Monitor:** Archaeological and, if requested, Native American monitoring will be required for all project areas indicated in the October 2023 Environmentally Sensitive Area Action and Monitoring Plan. All monitoring during construction activities within the Archaeological Monitoring Area will be conducted by Caltrans Professionally Qualified Staff (PQS) archaeologist, or qualified consultant archaeologist. The Caltrans archaeologist will coordinate with the Caltrans on-call cultural consultant, District 10 Native American coordinator, the Caltrans resident engineer, the District 10 environmental construction liaison, and the Stanislaus National Forest Archaeologist to schedule archaeological and Native American monitoring prior to construction and ensure monitors are onsite during construction.

The archaeological monitor will have the authority to temporarily halt construction operations within 60 feet of any significant or potentially

significant cultural resources that are encountered during construction operations. In this event, the designated monitor will be responsible for immediately informing the responsible Caltrans archaeologist and resident engineer. The contractor should not resume work within 60 feet of the find until a Caltrans Professionally Qualified Staff archaeologist or qualified consultant equivalent can appropriately consult and assesses the significance of the discovery or damage, and the contractor is authorized to resume work.

The archaeological monitor will consult with the Native American monitor and Stanislaus National Forest Archaeologist on any archaeological discoveries to make a determination of significance. The Native American monitor will have the authority to temporarily halt the excavation to examine potential cultural materials in consultation with the archaeological monitor.

- **CU-2. Environmentally Sensitive Areas (ESA) Designation – Cultural:** A qualified archaeologist shall designate Environmentally Sensitive Areas for the protection of cultural resources within or near the project's area of potential effect. These boundaries will be recorded in and implemented through the October 2023 Environmentally Sensitive Area Action and Monitoring Plan and shown on project plans. These Environmentally Sensitive Area boundaries will be established as a first order of work and remain in place until all construction activities are complete. Contractor encroachment into Environmentally Sensitive Areas will be prohibited. If the Environmentally Sensitive Area boundaries are breached, all work within 60 feet of the boundary will be stopped, the area will be secured, and the Caltrans resident engineer must be notified. If the Environmentally Sensitive Area is damaged, Caltrans will determine the necessary remediation and the party to perform this work.

At the first archaeological site within the area of direct impacts, a horizontal Environmentally Sensitive Area will be utilized. At the second site adjacent to the area of direct impacts, a horizontal Environmentally Sensitive Area will be used. No high-visibility fencing is proposed for either location, as it may impede access to nearby recreational resources and draw unwanted attention to the archaeological sites.

- **CU-3. Special procedures for human remains:** If human remains are encountered during construction, work in the immediate area shall be halted within 60 feet of the find and arrangements made to protect the remains in place until their disposition has been arranged according to this section. The treatment of human remains and associated and unassociated funerary objects discovered during any ground-disturbing activity shall comply with applicable Federal and State laws. The

remains will be uncovered sufficiently to identify them as human. If they are so identified, all provisions of California Health and Safety Code Sections 7054 and 7050.5 and Public Resources Code Sections 5097.9 through 5097.99, as amended per Assembly Bill 2641, will be followed.

The on-site archaeologist (if not a Caltrans Professionally Qualified Staff archaeologist) will immediately communicate the find to the Caltrans archaeologist, who will contact the Alpine County Coroner and the Stanislaus National Forest Heritage Resource and Tribal Relations Program Manager. In the event of the coroner's determination that the human remains are Native American, they will contact the Native American Heritage Commission within 24 hours, who will designate a Most Likely Descendant (MLD) (PRC Section 5097.98). Because the project is within National Forest-owned land, Caltrans will defer to the Stanislaus National Forest and consulting Tribes for proposed treatment in the case of the discovery of human remains.

The following measures will avoid or minimize greenhouse gas emission impacts from temporary construction activities as discussed in Section 2.1.8 of this document.

- **GHG-1. Limit equipment idling:** The contractor will limit idling to 5 minutes for delivery and dump trucks and other diesel-powered equipment.
- **GHG-2. Schedule truck trips:** The contractor will schedule truck trips outside of peak morning and evening commute hours.
- **GHG-3. Equipment fuel efficiency:** The contractor will improve fuel efficiency from construction equipment by maintaining equipment in proper working condition, using the right size equipment for the job, and using equipment with new technologies where feasible.
- **GHG-4. Construction environmental training:** The contractor will provide construction environmental training that includes strategies to reduce greenhouse gas emissions.

This paragraph and accompanying three measures have been added since publication of the draft environmental document as a result of Section 4(f) consultation with the Stanislaus National Forest. The following measures will avoid or minimize impacts from temporary traffic control and lane closures during construction, as discussed in Section 1.4.1 and Appendix C of this document.

- **TC-1. Full closure timing restrictions:** Full closure will only be implemented on Monday, Tuesday, and Wednesday from 8:00 a.m. to

5:00 p.m. in order to minimize negative impacts to Forest visitors. Full closures will be located only in the area of the current work happening that day, minimizing the amount of highway affected.

- **TC-2. Traffic control schedule:** Caltrans will provide the U.S. Forest Service a written schedule of the exact location of work, full and one-way control closure locations, and dates prior to February 1, 2025, with weekly updates if deviation of plan occurs. The U.S. Forest Service will not authorize any (one way or full) traffic closures between Memorial Day (last Monday in May) and Labor Day (first Monday of September) in the Lake Alpine Recreation Area, from post mile 3.25 to post mile 6.5, as this area experiences high visitor use during this period.
- **TC-3. Traffic control specifications:** Caltrans will incorporate the traffic control requirements discussed in Measures TC-1 and TC-2 into the project specifications as part of the contract documentation when the project goes out to bid, to avoid any misunderstandings as the project moves forward.

Appendix C Section 4(f) Documentation

This document discusses the de minimis impact determinations under Section 4(f). Section 6009(a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users Extensions Acts amended Section 4(f) legislation at 23 U.S. Code 138 and 49 U.S. Code 303 to simplify the processing and approval of projects that have only de minimis impacts on lands protected by Section 4(f). This amendment provides that once the U.S. Department of Transportation determines that a transportation use of a Section 4(f) property, after consideration of any impact avoidance, minimization, and mitigation or enhancement measures, results in a de minimis impact on that property, an analysis of avoidance alternatives is not required, and the Section 4(f) evaluation process is complete. The Federal Highway Administration's final rule on Section 4(f) de minimis findings is codified in 23 Code of Federal Regulations 774.3 and Code of Federal Regulations 774.17.

Responsibility for compliance with Section 4(f) has been assigned to the Department (Caltrans) pursuant to 23 U.S. Code 326 and 327, including de minimis impact determinations, as well as coordination with those agencies that have jurisdiction over a Section 4(f) resource that may be affected by a project action.

C-1 Background

Project Description

The California Department of Transportation (Caltrans) proposes to rehabilitate existing drainage systems at 29 locations on State Routes 4 and 207 in Alpine County. Existing drainage systems at proposed locations have exceeded their design life and have deteriorated or failed. The project work includes replacing or rehabilitating existing culverts and upgrading or replacing end treatments and headwalls as needed.

Proposed Alternatives

The proposed project has two alternatives under consideration—one Build Alternative and one No-Build Alternative. The No-Build Alternative would not address the purpose and need of the project, as it would leave the deteriorating culverts in their current condition.

The Build Alternative will rehabilitate 29 existing drainage systems in Alpine County by repairing or replacing existing culverts and upgrading or replacing end treatments and headwalls as needed. A full list of project locations and the proposed work at each location can be found in Chapter 1.4.1 of this document.

This paragraph has been updated since the publication of the draft environmental document. To keep the road open to traffic during construction, the project will maintain one through-traffic lane not less than 10 feet in width for use by both directions of travel where feasible. During construction work at these locations, the lane closure will be in effect between the hours of 6:00 a.m. to 6:00 p.m. from Monday through Thursday, and 6:00 a.m. to 3:00 p.m. on Friday.

The following paragraph and list of measures regarding full closures have been added since the publication of the draft environmental document. However, full road closure will be necessary for Locations 2 through 11. The portion of State Route 4 between post miles 3.25 and 7.70, which includes these project locations, narrows to one shared lane and prevents the use of one through-traffic lane during construction. As such, the traffic control plan will be adjusted at these locations to include full road closures, which will be subject to U.S. Forest Service requirements in order to avoid additional impacts to Section 4(f) recreational resources.

- **TC-1. Full closure timing restrictions:** Full closure will only be implemented on Monday, Tuesday, and Wednesday from 8:00 a.m. to 5:00 p.m. in order to minimize negative impacts to Forest visitors. Full closures will be located only in the area of the current work happening that day, minimizing the amount of highway affected.
- **TC-2. Traffic control schedule:** Caltrans will provide the U.S. Forest Service a written schedule of the exact location of work, full and one-way control closure locations, and dates prior to February 1, 2025, with weekly updates if deviation of plan occurs. The U.S. Forest Service will not authorize any (one way or full) traffic closures between Memorial Day (last Monday in May) and Labor Day (first Monday of September) in the Lake Alpine Recreation Area, from post mile 3.25 to post mile 6.5, as this area experiences high visitor use during this period.
- **TC-3. Traffic control specifications:** Caltrans will incorporate the traffic control requirements discussed in Measures TC-1 and TC-2 into the project specifications as part of the contract documentation when the project goes out to bid, to avoid any misunderstandings as the project moves forward.

This paragraph was updated since publication of the draft environmental document. Construction of the project is anticipated to begin in summer 2027 and work at each location is anticipated to take one to two working days to complete.

This paragraph has been updated since the publication of the draft environmental document. The temporary construction easements required for the project are all directly adjacent to Caltrans right-of-way and located within

the jurisdiction of the United States Forest Service within the Stanislaus National Forest. The project location on State Route 4, post mile 30.37 (previously referred to as Location 28 in the draft environmental document), which included a temporary construction easement within the Humboldt-Toiyabe National Forest, has been removed from the project scope after consultation was completed with the Humboldt-Toiyabe National Forest representative. See Chapter 3 of this document for details.

The following locations will require temporary construction easements in the jurisdiction of the Stanislaus National Forest.

- Location 6 on State Route 4, post mile 6.57: Temporary construction easement of 450 square feet along the east edge of State Route 4.
- Location 11 on State Route 4, post mile 7.53: Temporary construction easement of 750 square feet along the south edge of State Route 4.
- Location 12 on State Route 4, post mile 8.34: Temporary construction easement of 900 square feet along the south edge of State Route 4.
- Location 22 on State Route 4, post mile 13.20: Temporary construction easements of 600 square feet along the north edge and 450 square feet along the south edge of State Route 4.
- Location 24 on State Route 4, post mile 13.62: Temporary construction easement of 600 square feet along the south edge of State Route 4.
- Location 28 on State Route 207, post mile 0.38: Temporary construction easements of 2,100 square feet along the west edge and 1,050 square feet along the east edge of State Route 207.
- Location 29 on State Route 207, post mile 1.19: Temporary construction easements of 600 square feet along the north edge and 600 square feet along the south edge of State Route 207.

C-2 Section 4(f) Recreational Resources

Of the 29 proposed project locations, 17 locations are within 0.5 miles of potential Section 4(f) recreational resources. The project locations and the nearby recreational resources are listed as follows:

- Location 1 on State Route 4, post mile 2.12: Approximately 300 feet southwest of the Alpine Ranger Station. Approximately 1,700 feet southwest of the Lodgepole Group Campground and Overflow Campground.

- Location 2 on State Route 4, post mile 3.66: Approximately 1,000 feet west of Lake Alpine and associated recreational areas, including the Lake Alpine Campground, Lake Alpine Recreation Area, and Slick Rock Road Trail.
- Location 3 on State Route 4, post mile 3.99: Within 200 feet of the Lake Alpine shoreline and approximately 1,500 feet east of associated recreational areas, including the Lake Alpine Campground, Lake Alpine Recreation Area, and Slick Rock Road Trail.
- Location 4 on State Route 4, post mile 4.04: Within 200 feet of the Lake Alpine shoreline and approximately 1,500 feet east of associated recreational areas, including the Lake Alpine Campground, Lake Alpine Recreation Area, and Slick Rock Road Trail.
- Location 5 on State Route 4, post mile 4.40: Within 200 feet of the Lake Alpine shoreline and approximately 2,000 feet west of associated recreational areas, including Backpackers Campground, Pine Marten Campground, and Silver Valley Campground.
- Location 6 on State Route 4, post mile 6.57: Approximately 1,000 feet northwest of the Cape Horn Vista Point. Temporary construction easement of 450 square feet required along the east edge of State Route 4.
- Location 7 on State Route 4, post mile 6.61: Approximately 650 feet northwest of the Cape Horn Vista Point.
- Location 15 on State Route 4, post mile 9.12: Approximately 2,000 feet southwest of Sandy Meadow Trailhead.
- Location 16 on State Route 4, post mile 9.59: Within 200 feet of the Sandy Meadow Trailhead.
- Location 17 on State Route 4, post mile 9.64: Within 250 feet of the Sandy Meadow Trailhead.
- Location 18 on State Route 4, post mile 9.73: Approximately 900 feet east of the Sandy Meadow Trailhead.
- Location 19 on State Route 4, post mile 9.89: Approximately 1,700 feet east of the Sandy Meadow Trailhead.
- Location 20 State Route 4, post mile 10.93: Approximately 1,300 feet northeast of Mosquito Lake and associated recreational areas, including Mosquito Lakes Campground. Approximately 2,000 west of the Pacific Valley Campground.

- Location 21 on State Route 4, post mile 12.26: Approximately 2,200 feet south of Mokelumne River Trail.
- Location 22 on State Route 4, post mile 13.20: Approximately 500 feet east of Hermit Valley Campground, and approximately 900 feet east of the Deer Valley Trailhead. Temporary construction easements of 600 square feet required along the north edge and 450 square feet required along the south edge of State Route 4.
- Location 28 on State Route 207, post mile 0.38: Approximately 1,000 feet northwest of Round Valley SNO-PARK, and approximately 2,200 feet northwest of Lake Alpine SNO-PARK and Silvertip Campground. Temporary construction easements of 2,100 square feet required along the west edge and 1,050 square feet required along the east edge of State Route 207.

The following recreational facilities are within 0.5-miles of the above listed project locations and may be considered Section 4(f) resources or relevant to the recreational use of the surrounding forests.

Alpine Ranger Station

While not a strictly recreational resource, the Alpine Ranger Station along State Route 4 is a government office for the United States Forest Service, which manages the forests, campgrounds, and other recreational resources within the surrounding Stanislaus National Forest.

Lake Alpine

Lake Alpine is the largest recreational resource along State Route 4 in the project vicinity, spanning around 180 acres. It is the primary draw for many of the surrounding campgrounds and recreational land uses in the area. During the warm season, visitors use the lake recreation area for swimming, boating, hiking, camping, fishing, picnicking, biking, and outdoor learning programs. Furthermore, during the winter months, the area from the closure gate 2.5 miles east of Bear Valley to the top of Ebbetts Pass (approximately 15 miles) and to Highland Lakes is closed, and the lake becomes part of the Lake Alpine SNO-PARK and Round Valley SNO-PARK. During this period, visitors use the area for snowmobiling, snowshoeing, and cross-country skiing.

Lake Alpine - Associated Campgrounds and Recreation Areas

There are numerous campgrounds and recreational land uses related to Lake Alpine in the surrounding area. These include Lake Alpine Campground, as well as Silver Tip, West Shore, Pine Marten, Silver Valley and Backpackers Campgrounds. The Slick Rock Road Trailhead is also located adjacent to the west shore of the lake. The Lodgepole Group and Overflow Campgrounds are

further from Lake Alpine than the others, situated approximately one mile to the west, but are also used by visitors participating in recreational activities at the lake.

Cape Horn Vista Point

The Cape Horn Vista Point is a small, scenic overlook and recreational area with a picnic table, and is situated along State Route 4 near the project locations Location 6 at post mile 6.57 and Location 7 at post mile 6.61. While the area is only large enough for a few automobiles, it is a popular rest stop and visitor destination.

Sandy Meadow Trailhead

The Sandy Meadow Trailhead is located approximately 0.75 miles west of Mosquito Lake. It serves as a parking area and hiking point for the visiting public. It is a longer but flatter hiking trail for those wishing to access Wheeler Lake, which is around 4.2 miles to the west.

Mosquito Lakes

Mosquito Lakes are a series of smaller adjacent water bodies located around 5 miles northeast of Lake Alpine, and are often used for camping, picnicking, and fishing.

Mosquito Lakes - Associated Campgrounds and Recreation Areas

Of the recreational areas within the general project vicinity, there are two located near Mosquito Lakes. This includes Mosquito Lakes Campground, adjacent to State Route 4 near Mosquito Lakes, and Pacific Valley Campground, located to the east along Pacific Valley Road and used for access to Mosquito Lakes, Mokelumne River, and Pacific Creek.

Mokelumne River Trailhead

The Mokelumne River Trailhead is adjacent to State Route 4 and North Fork Mokelumne River, and also located near Hermit Valley Campground and Deer Valley Trailhead. The Mokelumne River Trailhead is a notoriously long and challenging hike, spanning 25.5 miles and taking over 12 hours to complete.

Deer Valley Trailhead

This paragraph has been updated since the publication of the draft environmental document to include mention of the off-road and four-wheel drive vehicle recreation. The Deer Valley Trailhead is located near Hermit Valley Campground and the North Fork Mokelumne River. It is used to access the Mokelumne wilderness. Accessing this wilderness requires a

Wilderness Permit, and the trail is typically used in the fall for hunting. It is also used for off-road and four-wheel drive vehicle recreation.

Hermit Valley Campground

This paragraph has been updated since the publication of the draft environmental document to include mention of the off-road and four-wheel drive vehicle recreation. The Hermit Valley Campground is located near several trails and the North Fork Mokelumne River. It is used as a camping and staging area for hikers, hunters, and other visitors. It is also used as a staging area for off-road and four-wheel drive vehicle recreation.

C-2 De Minimis Determination

The majority of project locations will involve drainage system improvements adjacent to the roadway that can be performed within Caltrans right-of-way and will not involve significant impacts to any Section 4(f) resources outside of Caltrans right-of-way.

This paragraph has been updated since the publication of the draft environmental document. Of the seven project locations requiring temporary construction easements, only three are within the vicinity of Section 4(f) recreational resources (Location 6 on State Route 4, post mile 6.57, Location 22 on State Route 4, post mile 13.20, and Location 28 on State Route 207, post mile 0.38). These easements will be located approximately 1,000 feet from Cape Horn Vista Point, 500 feet from Hermit Valley Campground, 900 feet from Deer Valley Trailhead, 1,000 feet from Round Valley SNO-PARK, and 2,200 feet from Lake Alpine SNO-PARK and Silvertip Campground.

This paragraph has been updated since the publication of the draft environmental document. The project will result only in minor, indirect, or temporary impacts to recreational resources during the 120-day construction working period. Public access along State Route 4 and 207 through most of the project area will not be blocked or impeded by the proposed work, as one traffic-through lane will be maintained throughout construction where feasible. Construction work and lane closures will also be limited to weekdays, which will limit impacts to the public during the weekend peak periods of travel and recreational use. At Locations 2 through 11, where full closures will be required during construction, Caltrans will plan the closures based on the U.S. Forest Service requirements listed in Section C-1 of this Appendix in order to minimize impacts to Forest visitors. Additionally, construction impacts will also be temporary in nature, as the work at each location will average only four working days and any vegetation removed will be replanted after construction.

The following measures from the 2024 Caltrans Standard Specifications included with the project will reduce potential impacts to Section 4(f) recreational resources.

- Section 4-1.13: Scope of Work—Cleanup
- Section 10-5: Dust Control
- Section 13: Water Pollution Control
- Section 14-8: Noise Control
- Section 14-9.02: Air Pollution Control

The following avoidance and minimization measures will also reduce potential impacts to Section 4(f) recreational resources. Full descriptions of these measures can be found in Appendix B of this document:

- BIO-3. Containment Measures/Construction Site Best Management Practices
- BIO-5. Limited Operation Period – In Water Construction Activities
- BIO-6. Limit Vegetation Removal
- BIO-7. Restore and Revegetate Temporarily Disturbed Areas Onsite
- BIO-21. Compensatory Mitigation – Wetlands and Other Waters of the United States
- BIO-22. Compensatory Mitigation – Riparian Vegetation
- CU-2. Environmentally Sensitive Areas (ESA) Designation – Cultural
- TC-1. Full closure timing restrictions.
- TC-2. Traffic control schedule.
- TC-3. Traffic control specifications.

The project will also involve indirect improvements to Section 4(f) recreational resources in the project area. Drainage system repair and replacements will improve road stability and reduce the likelihood of roadway flooding or collapse that could block public access to recreational areas.

This paragraph has been updated since the publication of the draft environmental document. The removal of the location at State Route 4, post mile 30.37 (previously referred to as Location 28 from the draft environmental document) from the project scope has eliminated the need for Section 4(f) concurrence from the Humboldt-Toiyabe National Forest. Caltrans, on behalf of FHWA, is proposing a de minimis determination under Section 4(f) for

impacts to the Section 4(f) recreational resources in the Stanislaus National Forest. Impacts to the protected activities, features, and attributes of the Section 4(f) resources will be reduced to a de minimis level with implementation of the minimization measures detailed above.

This paragraph has been updated since the publication of the draft environmental document to reflect receipt of the Section 4(f) De Minimis Concurrence from the U.S Forest Service. Concurrence from the United States Forest Service on Caltrans' de minimis impact determination was received on January 13, 2025. See written concurrence in Appendix E.

Appendix D Section 4(f) Concurrence

This appendix was added after the draft environmental document completed circulation. It contains the letter received from the Stanislaus National Forest Service on January 13, 2025, documenting concurrence with the determination of de minimis impacts for Section 4(f). The comment letter is stated verbatim as submitted, with acronyms, abbreviations, and any original grammatical or typographical errors included.

December 13, 2024

Stanislaus National Forest Supervisor's Office
U.S. Forest Service
19777 Greenley Road
Sonora, CA 95370

To whom it may concern:

Request for Concurrence on Section 4(f) De Minimis Determination for the proposed Alpine County State Route 4 Drainage System Restoration Project on State Routes 4 and 207 in Alpine County

The California Department of Transportation (Caltrans), as assigned by the Federal Highway Administration (FHWA), is seeking your concurrence on a determination of de minimis impacts to dispersed recreational resources in the Stanislaus National Forest that are protected under Section 4(f) of the U.S. Department of Transportation Act of 1966.

The California Department of Transportation (Caltrans) proposes to rehabilitate existing drainage systems at 29 locations on State Routes 4 and 207 in Alpine County. Existing drainage systems at proposed locations have exceeded their design life and have deteriorated or failed. The project work includes replacing or rehabilitating existing culverts, and upgrading or replacing end treatments and headwalls as needed.

A de minimis impact involves the use of Section 4(f) property that, after taking into account avoidance, minimization, mitigation and enhancement measures, results in no adverse effect to the activities, features, or attributes qualifying a park, recreation area, or refuge for protection under Section 4(f).

The proposed work meets all necessary criteria for a de minimis determination. The final requirement for this determination is the written concurrence of the official with jurisdiction over the Section 4(f) resource, the United States Forest Service.

The proposed project's Initial Study with Proposed Mitigated Negative Declaration (draft environmental document) and Section 4(f) De Minimis Determination were made available for public review and comments between September 25, 2024 and October 28, 2024. During this period, Caltrans received no comments regarding impacts to Section 4(f) resources. The public Notice of Intent was sent via U.S. mail to the Stanislaus National Forest Supervisor's Office on September 25, 2024.

Caltrans also continued to communicate via email with Mr. Todd Newburger at the U.S. Forest Service from November 15, 2024 onwards in an effort to obtain the agency's concurrence on the finding of de minimis impacts. As a result of this coordination, it was brought to Caltrans' attention that the one through lane traffic control outlined in the draft environmental document would not be feasible for a select stretch of State Route 4 near Lake Alpine (located approximately between post miles 3.25 to 7.70), as the road narrows to one shared lane.

Caltrans agrees to the following traffic control requirements based on coordination with the U.S. Forest Service. These traffic control requirements will also be included in the final environmental document for the project:

Where full closures are needed for construction, full closure would only be implemented on Monday, Tuesday, and Wednesday from 8am to 5pm in order to minimize negative impacts to Forest visitors. Full closures would be located only in the area of the current work happening that day, minimizing the amount of highway affected.

Caltrans would provide the U.S. Forest Service a written schedule of the exact location of work, full and one-way control closure locations and dates prior by February 1, 2025, with weekly updates if deviation of plan occurs. The U.S. Forest Service will not authorize any (one way or full) traffic closures between Memorial Day (last Monday in May) and Labor Day (first Monday of September) in the Lake Alpine Recreation Area, post mile 3.25 to post mile 6.5, as this area experiences high visitor use during this period.

Caltrans would include these requirements in the project specifications as part of the contract documentation when the project goes out to bid, to avoid any misunderstandings as the project moves forward.

Pursuant to Section 4(f) requirements for de minimis impact determinations, the official(s) with jurisdiction over the subject property must concur with the Section 4(f) de minimis finding that the project will not adversely affect the activities, features, or attributes that qualify the property for protection under Section 4(f).

Please indicate your written concurrence by signing in the signature block provided below and returning the signed copy to Alexandros Xides at Alexandros.Xides@dot.ca.gov. Receipt of written concurrence from the Forest Service is required for Caltrans to move forward with project approval.

Unless stated otherwise, your concurrence with Caltrans' Section 4(f) documentation includes concurrence with all analysis and determinations for which concurrence from your agency is required.

If you have any questions or comments, please contact Alexandros Xides, Environmental Scientist, Caltrans, at (209) 479-1067 or Alexandros.Xides@dot.ca.gov.

Sincerely,

C. Scott Guidi

C. Scott Guidi
Caltrans District 10
Office Chief, Environmental Division

Enclosure or Attachment

- Initial Study with Proposed Mitigated Negative Declaration and Section 4(f) De Minimis Determination

Digitally signed by JASON KUIKEN

Date: 2025.01.13 13:36:36 -08'00'

Jason Kuiken
Forest Supervisor
Stanislaus National Forest

Appendix E Comment Letters and Responses

This appendix was added after the draft environmental document completed circulation. It contains the one comment received during the public circulation and comment period from September 25, 2024, to October 28, 2024, retyped for readability. The comment letter is stated verbatim as submitted, with acronyms, abbreviations, and any original grammatical or typographical errors included. A Caltrans response follows the comment presented. A copy of the original comment letter can be found in Volume 2 of this document.

Comment from the California Department of Fish and Wildlife:

Dear Laura Cook:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from the California Department of Transportation (Caltrans) for the Alpine County State Route (SR) 4 Drainage System Restoration Project (Project) pursuant to the California Environmental Quality Act (CEQA) statute and guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, 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 may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State 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

The Project site is located in Alpine County at 30 culvert locations on SR 4 between post mile (PM) 2.12 and 30.37 and on SR 207 between PM 0.38 and 1.19. The northernmost culvert location (PM 30.37) is approximately 6 miles southeast of Markleeville, California.

The Project consists of the rehabilitation of existing drainage systems at 30 locations on SR 4 and 207. Existing drainage systems at proposed locations have exceeded their design life and have deteriorated or failed. The proposed Project work includes replacing or upgrading existing culverts, end treatments and headwalls as needed. The culverts will be replaced by the same size or larger culverts determined by hydraulics requirements. The culverts will be replaced using the cut and cover method or the jack and bore method. The Project will include the installation of rock slope protection (RSP) at twelve (12) culvert locations. A temporary clear water diversion system is expected to be required at four (4) of the culvert locations. Tree and brush removal may be required for work access.

COMMENTS AND RECOMMENDATIONS

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

COMMENT 1: *Chapter 2.14 Biological Resources, Pages 19 - 27*

Issue: The MND does not disclose or adequately analyze potentially significant Project impacts to fisher (*Pekania pennanti*) that may occur from the Project including the removal, limbing or trimming of habitat.

Fisher is a CDFW species of special concern (SSC). Potentially suitable denning and foraging habitat for fisher occurs within the Project. In addition, there are four California Natural Diversity Database (CNDDB) occurrences of fisher within five miles of the Project.

During construction, suitable fisher habitat may be exposed to elevated noise levels, which can disrupt animal activities including denning, foraging, and resting. Project impacts may be considered potentially significant unless appropriate and enforceable mitigation is incorporated.

Recommendation: The MND should analyze and disclose potential Project impacts to fisher. If the Project has the potential to impact fisher, appropriate and enforceable avoidance and minimization measures should be added to the MND to mitigate impacts to a less than significant level. CDFW recommends, at a minimum, the following measure be incorporated into the MND:

Pre-construction Survey for Fisher. Within 5 days prior to the start of construction, a CDFW approved Designated Biologist shall conduct a survey for fisher and their potential den sites. The survey area shall include the Project footprint plus a 500-foot buffer. If a potential den is identified, an appropriately sized no disturbance buffer shall be established until the Designated Biologist can determine whether the den is occupied. If occupied

dens are identified, no work shall occur within a 250-foot no disturbance buffer around the den. Caltrans shall not resume work within 250-feet of the den until they have received written concurrence from CDFW. No suitable fisher denning habitat, as identified by the Designated Biologist, shall be removed or altered during the denning season (i.e., March 1 through September 15).

COMMENT 2: *Chapter 2.14 Biological Resources, Pages 19 – 27*

Issue: The MND does not disclose or adequately analyze potentially significant Project impacts to southern long-toed salamander (*Ambystoma macrodactylum sigillatum*).

The southern long-toed salamander is a CDFW SSC. There are over 60 CNDDDB occurrence of southern long-toed salamander in a five-mile radius of the Project, 14 of those occurrences are within one mile of the Project.

The Project has the potential to significantly impact southern long-toed salamanders and their habitat, which includes wetland and damp terrestrial forested habitat. Significant impacts may occur from Project related activities including but not limited to equipment ingress and egress, vegetation removal, culvert replacement, ground disturbing activities, staging, and access.

Recommendation: The MND should analyze and disclose potential Project impacts to southern long-toed salamander and their habitat. If the Project has the potential to impact southern long-toed salamander or their habitat, appropriate and enforceable avoidance and minimization measures should be added to the MND to mitigate impacts to a less than significant level.

COMMENT 3: *Chapter 2.14 Biological Resources, Page 19, 21, and 25; Appendix B, Avoidance, Minimization, and Mitigation Measures, BIO-8 Pre-Construction Surveys- Special-Status Plants, Page 53*

Issue: Special-status species include but are not limited to those considered either rare or regionally unique throughout their range (CEQA Guidelines § 15125[c]), identified as threatened, endangered, rare, or candidate by CDFW or U.S. Fish and Wildlife Service (USFWS) (CEQA Guidelines § 15380.), or plants that have a California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) of 1A, 1B, 2A, 2B, 3 and 4 (CEQA Guidelines § 15125[c]). Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA. As currently proposed in the MND, the Project has the potential to have a significant impact on special-status plant species as it does not include accurate survey results or adequate avoidance, minimization, and mitigation measures for Project related impacts to special-status plant species.

1a) In accordance with CDFW's, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (March 2018)*, to determine the presence or absence of special-status species that may be directly or indirectly impacted by Project activities, botanical field surveys should be conducted in a manner which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. For accurate results, botanical field surveys need to be conducted at the times of year when plants will be both evident and identifiable (i.e. blooming period). Additionally, botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the project area. This usually involves multiple visits to the project area (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine.

The special-status plant sections in Chapter 2.4 of the MND include the results of botanical surveys. These surveys were conducted on August 24, 2023, September 7 and 28, 2023, according to the Natural Environment Study (NES). The survey conducted on August 24, 2023, occurred at the end of the blooming period for the three special-status plant species the MND and NES conclude have potential to occur within the vicinity of the Project site (Davy's sedge, subalpine cryptantha, and three-bracted onion). Unknown adverse conditions may mean that some plant taxa will not be evident or identifiable towards the end of their bloom period or at all in a given year.

1b) *BIO-8 Pre-Construction Surveys- Special-Status Plant* measure does not mitigate to a less-than-significant level potential impacts to Davy's sedge, subalpine cryptantha, and three-bracted onion. The MND states that the pre-construction survey would be conducted no more than 24 hours prior to any ground disturbance at a given location. This is only beneficial if that time period overlaps with the identification (blooming) period for Davy's sedge, subalpine cryptantha, and three-bracted onion.

Recommendation: It is recommended that BIO-8 be revised with the following language to ensure the measure is effective, feasible and mitigates potential impacts to special-status plant species to a less-than-significant level.

"Protocol-level surveys in accordance with CDFW's, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (March 2018)* and conducted during the appropriate blooming period shall be performed by a qualified botanist for the following species:

- Davy's sedge (*Carex davyi*) (Bloom Period: April through August)
- Subalpine cryptantha (*Oreocarya crymophila*) (Bloom Period: May through August)

- Three-bracted onion (*Allium tribracteatum*) (Bloom Period: July through August)

A survey report which at a minimum includes the methods, results, and a map that shows the survey boundary and location of special-status plant species observations shall be prepared and submitted to CDFW no later than 10 days prior to the start of Project activities. The report shall include proposed plans for full avoidance and/or a plan to minimize and mitigate impacts to special-status plants. New sightings of sensitive plant species should be reported to the CNDDDB.”

COMMENT 5: *Chapter 2.14 Biological Resources, Environmental Consequences, Monarch Butterfly, Page 21*

Issue: The MND states that there are milkweed plants (monarch butterfly larvae’s sole host plant) present along the SR 4 corridor. However, the MND does not adequately analyze the Project’s potential impacts to monarch butterfly larvae. If milkweed is present within the Project footprint, there is potential for larvae to be crushed or other means of mortality during vegetation removal or equipment staging.

Recommendation: It is recommended that this paragraph in MND be revised to include an analysis on the Project’s potential impact on monarch butterfly larvae, and appropriate mitigation measures be incorporated into the MND to minimize impacts to monarch butterfly to a less-than-significant level. Appropriate mitigation measures may include:

Milkweed Protection: Within 7 days prior to the commencement of Project activities, a CDFW-approved Designated Biologist shall conduct a survey for milkweed plants (monarch butterfly larvae’s sole host plant) within the Project footprint.

- If no milkweed is observed within the Project footprint, Project activities may proceed as planned.
- If milkweed plants are identified within the Project footprint and can be avoided, Temporary High Visibility Fencing (THVF) shall be installed around the plants, and the area identified as an environmentally sensitive area (ESA) that will be avoided throughout the course of the Project activities.
- If the milkweed is identified in the Project footprint and impacts to the plant(s) are unavoidable, the Designated Biologist shall survey the plant for monarch butterfly larvae individuals immediately prior to start of Project activities. To offset Project related impacts to monarch butterfly, plants shall be transplanted outside of the Project footprint and the re-seeding mix proposed in BIO-7 should include milkweed species.

COMMENT 6: *Chapter 2.14 Biological Resources, Environmental Consequences, Common Wildlife and Fish Passage, Page 24*

Issue: The MND does not adequately analyze wildlife connectivity or wildlife vehicle collision mortality for deer, black bear, fox, bobcats, or other common wildlife species that migrate in the vicinity of the Project area. CDFW expects cumulative impacts to their populations to continue if the wildlife connectivity issue is not addressed. Lack of wildlife connectivity continues to make it difficult for the wildlife to cross for seasonal or daily use.

Species occurrence data, road mortality data, linkage designs, and adjacent suitable habitat should inform the CEQA analysis regarding potential for impacts and the development of mitigation measures to improve or enhance wildlife movement as a result of the Project. In weighing the impacts of the Project on wildlife movement, beyond regional wildlife “corridors”, analysis should address other common movement patterns. Food sources, water sources, migration routes, and breeding and sheltering areas that may be disconnected should be included in the impact analysis and considered when developing mitigation concepts. CDFW recommends incorporating survey data from sources such as the California Roadkill Observation System to establish scientific reasoning for crossing locations and improvements for wildlife crossings as appropriate. CDFW also recommends surveys are done before, during, and after construction to identify key areas where wildlife is crossing, observe how wildlife migration is affected by the Project, and assess the effectiveness of any newly constructed wildlife crossings along SR 4 and 207.

In addition, CDFW recognizes the value of wildlife crossing structures being incorporated into the design plans to mitigate for the disturbance (permanent and temporary stream and riparian impacts, impediment to migration, etc.) or offset the impacts of the Project. As appropriate, CDFW may consider crossings that protect and/or improve wildlife connectivity as a form of Project mitigation.

Recommendation: CDFW recommends that Caltrans identify suitable locations and incorporate wildlife crossing structures/features into their design plans. CDFW recommends upsizing and adding wildlife shelving for small mammals wherever it is feasible. Culverts that can be feasibly modified to increase headroom and conveyance capacity should also be identified and incorporated into the design plans.

COMMENT 7: *Appendix B, Avoidance, Minimization, and Mitigation Measures, BIO-1 Environmentally Sensitive Area (ESA) Designation, Page 51*

Issue: BIO-1 does not require a physical barrier or sign to delineate the ESA boundary. This would make it difficult for the Project personnel to identify areas they are permitted to work in and may lead to unnecessary or unforeseen impacts to ESAs.

Recommendation: It is recommended that BIO-1 be revised to include some language on the installation of THVF and/or flagging to delineate the ESA boundary.

COMMENT 8: *Appendix B, Avoidance, Minimization, and Mitigation Measures, BIO-19 Nesting Bird Avoidance – Pre-Construction Surveys, Page 57-58*

Issue: BIO-19 does not mitigate potential Project impacts to nesting migratory birds and raptors to a less-than-significant level. The MND states that nesting bird surveys would be conducted by a qualified biologist within 15 days prior to the beginning of Project-related activities. The window between surveying for active nests and the commencement of Project activities is too large to adequately protect nesting birds. Bird nests can be established and become active in a couple of days, especially during peak nesting season. Additionally, the MND does not provide the parameters for the survey area or qualifications the qualified biologist should have.

Recommendation: It is recommended that measure BIO-19 be revised to require that surveys be conducted three days or less prior to the commencement of Project-related activities at each culvert location rather than overall Project activities. It is recommended that a survey area of 500-feet for migratory birds and 1/2-mile for raptors around the Project site be defined in the measure. It is recommended that “qualified biologist” be changed to CDFW approved Designated Biologist.

COMMENT 9: *Appendix B Avoidance, Minimization, and Mitigation Measures, BIO-21 Compensatory Mitigation, Page 58*

Issue: CDFW does not participate in in-lieu-fee programs and cannot accept payments to in-lieu-fee programs as a form of compensatory mitigation.

Recommendation: It is recommended that a form of CDFW-approved compensatory mitigation for impacts to areas subject to section 1602 of the California Fish and Game Code be identified and included in the MND. This may include mitigating at CDFW-approved mitigation or conservation bank, or through other methods, as approved by 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: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

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

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the MND for the Alpine County SR 4 Drainage System Restoration Project to assist Caltrans in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Sammi Morford, Environmental Scientist, at (916) 880-8324 or Samantha.Morford@wildlife.ca.gov.

Sincerely,

Sammi Morford

Environmental Scientist (Caltrans Liaison)
Habitat Conservation Program | North Central Region (R2)
1701 Nimbus Rd., Suite A
Rancho Cordova, CA 95670

Responses to Comment from the California Department of Fish and Wildlife:

Thank you for your interest and comments on this document for the Alpine County State Route 4 Drainage System Restoration project.

Caltrans provided an electronic copy of the Natural Environmental Study (dated March 2024) to the California Department of Fish and Wildlife as requested on October 4, 2024. On October 28, 2024, Caltrans received comments from the California Department of Fish and Wildlife on the Initial Study with Proposed Mitigated Negative Declaration and Section 4(f) De Minimis Determination.

The following section contains responses to these comments, prepared by Melanie Reynoso, Caltrans District 10 Environmental Scientist (Biologist) and reviewed by Jeffrey Holt, Caltrans District 10 Senior Environmental Scientist (Supervisor) as of November 14, 2024, with additional input from Alexandros Xides, Caltrans District 10 Environmental Scientist (Generalist).

COMMENT 1: *Chapter 2.14 Biological Resources, Pages 19 – 27*

Issue: The MND does not disclose or adequately analyze potentially significant Project impacts to fisher (*Pekania pennanti*) that may occur from the Project including the removal, limbing or trimming of habitat.

Fisher is a CDFW species of special concern (SSC). Potentially suitable denning and foraging habitat for fisher occurs within the Project. In addition, there are four California Natural Diversity Database (CNDDB) occurrences of fisher within five miles of the Project.

During construction, suitable fisher habitat may be exposed to elevated noise levels, which can disrupt animal activities including denning, foraging, and resting. Project impacts may be considered potentially significant unless appropriate and enforceable mitigation is incorporated.

Recommendation: The MND should analyze and disclose potential Project impacts to fisher. If the Project has the potential to impact fisher, appropriate and enforceable avoidance and minimization measures should be added to the MND to mitigate impacts to a less than significant level. CDFW recommends, at a minimum, the following measure be incorporated into the MND:

Pre-construction Survey for Fisher. Within 5 days prior to the start of construction, a CDFW approved Designated Biologist shall conduct a survey for fisher and their potential den sites. The survey area shall include the Project footprint plus a 500-foot buffer. If a potential den is identified, an appropriately sized no disturbance buffer shall be established until the Designated Biologist can determine whether the den is occupied. If occupied dens are identified, no work shall occur within a 250-foot no disturbance buffer around the den. Caltrans shall not resume work within 250-feet of the den until they have received written concurrence from CDFW. No suitable fisher denning habitat, as identified by the Designated Biologist, shall be removed or altered during the denning season (i.e., March 1 through September 15).

Caltrans Response to Comment 1:

As of the March 2024 Natural Environment Study, it was determined that project activities will not affect habitat capable of supporting denning for the *Pekania pennanti*, as determined by the following biological inventory surveys in 2023 conducted by Caltrans Environmental Scientists (biologists):

- August 24, 2023: Melanie Reynoso and Sarah Daniel
- September 7, 2023 and September 28, 2023: Jason Meigs and Melanie Reynoso

Consecutive biological field survey visits were conducted by Caltrans Environmental Scientists (biologists) on the following dates in 2024:

- July 3, 2024: Melanie Reynoso, Jason Meigs, Nicole Kith, and Adam Egemo
- August 7, 2024: Melanie Reynoso, Jason Meigs, Nicole Kith, and Adam Egemo

Discussions below are made pertinent to the California Wildlife Habitat Relationships System California Department of Fish and Wildlife Life History Account description of the *Pekania pennanti*.

No active dens for *Pekania pennanti* were found at the culvert sites as of the stated survey dates in the July, August, and September months, nor were there indications of footprint trails on the ground visible within the vicinity.

It is anticipated that no work will occur during the fisher breeding period in late February to April, due to limited accessibility to the culverts from snow in the area and winter road closures. Contractors may delay construction until later in the year when the snowpacks no longer restrict access to the culvert work areas. Additionally, *BIO-5 – Limited Operation Period – In Water Construction Activities* limits construction work potentially impacting jurisdictional waters of the United States or waters of the State to the anticipated dry period between June 1 and October 15, unless otherwise approved by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service.

As such, no impacts are anticipated to the fisher species.

COMMENT 2: *Chapter 2.14 Biological Resources, Pages 19 – 27*

Issue: The MND does not disclose or adequately analyze potentially significant Project impacts to southern long-toed salamander (*Ambystoma macrodactylum sigillatum*).

The southern long-toed salamander is a CDFW SSC. There are over 60 CNDDDB occurrence of southern long-toed salamander in a five-mile radius of the Project, 14 of those occurrences are within one mile of the Project. The Project has the potential to significantly impact southern long-toed salamanders and their habitat, which includes wetland and damp terrestrial forested habitat.

Significant impacts may occur from Project related activities including but not limited to equipment ingress and egress, vegetation removal, culvert replacement, ground disturbing activities, staging, and access.

Recommendation: The MND should analyze and disclose potential Project impacts to southern long-toed salamander and their habitat. If the Project has the potential to impact southern long-toed salamander or their habitat, appropriate and enforceable avoidance and minimization measures should be added to the MND to mitigate impacts to a less than significant level.

Caltrans Response to Comment 2:

As of the March 2024 Natural Environment Study, it was determined that project activities will not affect habitat capable of supporting denning for the *Ambystoma macrodactylum sigillatum*.

As mentioned in the Caltrans Response to Comment 1, surveys were conducted of the project area in 2023 and 2024. During these surveys, no southern long-toed salamander or their preferred habitat were found near the project culvert locations. In addition, no meadows, permanent ponds or perennial waters were found at the culvert locations. It is anticipated that no work will occur during the southern long-toed salamander breeding period in late May to June, as culvert access would be limited by snow and road closures that typically last from the winter months into early June. Therefore, it was determined that southern long-toed salamander will not be affected by project activities, and no mitigation measures would be required.

Additionally, *BIO-5 – Limited Operation Period – In Water Construction Activities* limits construction work potentially impacting jurisdictional waters of the United States or waters of the State to the anticipated dry period between June 1 and October 15, unless otherwise approved by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service.

COMMENT 3: *Chapter 2.14 Biological Resources, Page 19, 21, and 25; Appendix B, Avoidance, Minimization, and Mitigation Measures, BIO-8 Pre-Construction Surveys - Special-Status Plants, Page 53*

Issue: Special-status species include but are not limited to those considered either rare or regionally unique throughout their range (CEQA Guidelines § 15125[c]), identified as threatened, endangered, rare, or candidate by CDFW or U.S. Fish and Wildlife Service (USFWS) (CEQA Guidelines § 15380.), or plants that have a California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) of 1A, 1B, 2A, 2B, 3 and 4 (CEQA Guidelines § 15125[c]). Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA. As currently proposed in the MND, the Project has the potential to have a significant impact on special-status plant species as it does not include accurate survey results or adequate avoidance, minimization, and mitigation measures for Project related impacts to special-status plant species.

1a) In accordance with CDFW's, Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (March 2018), to determine the presence or absence of special-status species that may be directly or indirectly impacted by Project activities, botanical field surveys should be conducted in a manner which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. For accurate results, botanical field surveys need to be conducted at the times of year when plants will be both evident and identifiable (i.e. blooming period). Additionally, botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the project area. This usually involves multiple visits to the project area (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine.

The special-status plant sections in Chapter 2.4 of the MND include the results of botanical surveys. These surveys were conducted on August 24, 2023, September 7 and 28, 2023, according to the Natural Environment Study (NES). The survey conducted on August 24, 2023, occurred at the end of the blooming period for the three special-status plant species the MND and NES conclude have potential to occur within the vicinity of the Project site (Davy's sedge, subalpine cryptantha, and three bracted onion). Unknown adverse conditions may mean that some plant taxa will not be evident or identifiable towards the end of their bloom period or at all in a given year.

1b) *BIO-8 Pre-Construction Surveys- Special-Status Plant* measure does not mitigate to a less-than-significant level potential impacts to Davy's sedge, subalpine cryptantha, and three-bracted onion. The MND states that the pre-construction survey would be conducted no more than 24 hours prior to any ground disturbance at a given location. This is only beneficial if that time

period overlaps with the identification (blooming) period for Davy's sedge, subalpine cryptantha, and three-bracted onion.

Recommendation: It is recommended that BIO-8 be revised with the following language to ensure the measure is effective, feasible and mitigates potential impacts to special-status plant species to a less-than-significant level.

"Protocol-level surveys in accordance with CDFW's, *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (March 2018)* and conducted during the appropriate blooming period shall be performed by a qualified botanist for the following species:

- Davy's sedge (*Carex davyi*) (Bloom Period: April through August)
- Subalpine cryptantha (*Oreocarya crymophila*) (Bloom Period: May through August)
- Three-bracted onion (*Allium tribracteatum*) (Bloom Period: July through August)

A survey report which at a minimum includes the methods, results, and a map that shows the survey boundary and location of special-status plant species observations shall be prepared and submitted to CDFW no later than 10 days prior to the start of Project activities. The report shall include proposed plans for full avoidance and/or a plan to minimize and mitigate impacts to special-status plants. New sightings of sensitive plant species should be reported to the CNDDB."

Caltrans Response to Comment 3:

As stated in Caltrans Response to Comment 1, biological inventory surveys were conducted in 2023 and 2024 by Caltrans Environmental Scientists (biologists).

None of the three plant species were discovered onsite at the project's culverts during botanical surveys in 2023 and 2024 between the months of July through September. The 2024 surveys occurred earlier in the blooming period and confirmed the results of the 2023 surveys, with none of the three plant species present at the site. As such, Caltrans does not anticipate these species occurring within the area of construction impacts, and Measure BIO-8 (Pre-Construction Surveys – Special-Status Plants) in this document has not been altered. Pre-construction surveys will be conducted at each location for sensitive plants following Caltrans protocol surveys. Language has been added to Chapter 2.1.4 (Biological Resources) to make note of these 2024 botanical surveys.

Please also note that Measure BIO-8 is considered an avoidance and minimization measure for the purposes of CEQA, not a mitigation measure, as no significant impacts are anticipated to species-status plant species.

COMMENT 5: *Chapter 2.14 Biological Resources, Environmental Consequences, Monarch Butterfly, Page 21*

Issue: The MND states that there are milkweed plants (monarch butterfly larvae's sole host plant) present along the SR 4 corridor. However, the MND does not adequately analyze the Project's potential impacts to monarch butterfly larvae. If milkweed is present within the Project footprint, there is potential for larvae to be crushed or other means of mortality during vegetation removal or equipment staging.

Recommendation: It is recommended that this paragraph in MND be revised to include an analysis on the Project's potential impact on monarch butterfly larvae, and appropriate mitigation measures be incorporated into the MND to minimize impacts to monarch butterfly to a less-than-significant level. Appropriate mitigation measures may include:

Milkweed Protection: Within 7 days prior to the commencement of Project activities, a CDFW-approved Designated Biologist shall conduct a survey for milkweed plants (monarch butterfly larvae's sole host plant) within the Project footprint.

If no milkweed is observed within the Project footprint, Project activities may proceed as planned.

If milkweed plants are identified within the Project footprint and can be avoided, Temporary High Visibility Fencing (THVF) shall be installed around the plants, and the area identified as an environmentally sensitive area (ESA) that will be avoided throughout the course of the Project activities.

If the milkweed is identified in the Project footprint and impacts to the plant(s) are unavoidable, the Designated Biologist shall survey the plant for monarch butterfly larvae individuals immediately prior to start of Project activities. To offset Project related impacts to monarch butterfly, plants shall be transplanted outside of the Project footprint and the re-seeding mix proposed in BIO-7 should include milkweed species.

Caltrans Response to Comment 5:

Please note that the comment letter from the California Department of Fish and Wildlife did not include a comment titled "Comment 4". To match the numbering in the comment letter, the fourth comment and comment response in this environmental document are titled "Comment 5" and "Caltrans Response to Comment 5" respectively.

As stated in Caltrans Response to Comment 1, biological inventory surveys were conducted in 2023 and 2024 by Caltrans Environmental Scientists (biologists).

Milkweed plants were not found within an approximate 200-foot radius of the project's culverts during the surveys conducted in 2023 and 2024. Therefore, it was determined that monarchs would not be affected by project activities and would not require mitigation measures for significant impacts. Pre-construction surveys will be conducted for the species with an appropriate buffer if they are discovered in the project.

COMMENT 6: *Chapter 2.14 Biological Resources, Environmental Consequences, Common Wildlife and Fish Passage, Page 24*

Issue: The MND does not adequately analyze wildlife connectivity or wildlife vehicle collision mortality for deer, black bear, fox, bobcats, or other common wildlife species that migrate in the vicinity of the Project area. CDFW expects cumulative impacts to their populations to continue if the wildlife connectivity issue is not addressed. Lack of wildlife connectivity continues to make it difficult for the wildlife to cross for seasonal or daily use.

Species occurrence data, road mortality data, linkage designs, and adjacent suitable habitat should inform the CEQA analysis regarding potential for impacts and the development of mitigation measures to improve or enhance wildlife movement as a result of the Project. In weighing the impacts of the Project on wildlife movement, beyond regional wildlife “corridors”, analysis should address other common movement patterns. Food sources, water sources, migration routes, and breeding and sheltering areas that may be disconnected should be included in the impact analysis and considered when developing mitigation concepts. CDFW recommends incorporating survey data from sources such as the California Roadkill Observation System to establish scientific reasoning for crossing locations and improvements for wildlife crossings as appropriate. CDFW also recommends surveys are done before, during, and after construction to identify key areas where wildlife is crossing, observe how wildlife migration is affected by the Project, and assess the effectiveness of any newly constructed wildlife crossings along SR 4 and 207.

In addition, CDFW recognizes the value of wildlife crossing structures being incorporated into the design plans to mitigate for the disturbance (permanent and temporary stream and riparian impacts, impediment to migration, etc.) or offset the impacts of the Project. As appropriate, CDFW may consider crossings that protect and/or improve wildlife connectivity as a form of Project mitigation.

Recommendation: CDFW recommends that Caltrans identify suitable locations and incorporate wildlife crossing structures/features into their design plans. CDFW recommends upsizing and adding wildlife shelving for small mammals wherever it is feasible. Culverts that can be feasibly modified to increase headroom and conveyance capacity should also be identified and incorporated into the design plans.

Caltrans Response to Comment 6:

As stated in Caltrans Response to Comment 1, biological inventory surveys were conducted in 2023 and 2024 by Caltrans Environmental Scientists (biologists).

Between the survey dates in 2023 and 2024, no species were discovered as roadkill on the road adjacent to the culverts. The project design includes culvert upsizing at multiple locations where it has been deemed appropriate, so the project is expected to improve wildlife connectivity across the roadway. Please refer to Section 1.4.1 of this environmental document for full descriptions of the proposed work at each location.

As such, the project is not anticipated to result in additional cumulative impacts to wildlife species. None of the culverts were determined to be on perennial streams or ponds. Additional wildlife connectivity measures may be incorporated as avoidance and minimization strategies when Caltrans applies for a California Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife.

COMMENT 7: *Appendix B, Avoidance, Minimization, and Mitigation Measures, BIO-1 Environmentally Sensitive Area (ESA) Designation, Page 51*

Issue: BIO-1 does not require a physical barrier or sign to delineate the ESA boundary. This would make it difficult for the Project personnel to identify areas they are permitted to work in and may lead to unnecessary or unforeseen impacts to ESAs.

Recommendation: It is recommended that BIO-1 be revised to include some language on the installation of THVF and/or flagging to delineate the ESA boundary.

Caltrans Response to Comment 7:

Caltrans will include the installation of temporary high visibility fencing and signs to delineate the Environmentally Sensitive Area boundary into the Standard Special Provisions for construction. Measure BIO-1 in this document has been revised to include this information.

COMMENT 8: *Appendix B, Avoidance, Minimization, and Mitigation Measures, BIO-19 Nesting Bird Avoidance – Pre-Construction Surveys, Page 57-58*

Issue: BIO-19 does not mitigate potential Project impacts to nesting migratory birds and raptors to a less-than-significant level. The MND states that nesting bird surveys would be conducted by a qualified biologist within 15 days prior to the beginning of Project-related activities. The window between surveying for active nests and the commencement of Project activities is too large to adequately protect nesting birds.

Bird nests can be established and become active in a couple of days, especially during peak nesting season. Additionally, the MND does not provide the parameters for the survey area or qualifications the qualified biologist should have.

Recommendation: It is recommended that measure BIO-19 be revised to require that surveys be conducted three days or less prior to the commencement of Project related activities at each culvert location rather than overall Project activities. It is recommended that a survey area of 500-feet for migratory birds and 1/2-mile for raptors around the Project site be defined in the measure. It is recommended that “qualified biologist” be changed to CDFW approved Designated Biologist.

Caltrans Response to Comment 8:

Measure BIO-19 is considered an avoidance and minimization measure, rather than a mitigation measure, as no significant impacts are anticipated. Caltrans will follow the Standard Specifications for pre-construction surveys as stated below from BIO-19. The surveys will be conducted within a 500-foot radius of each project work area as determined by the terrain accessibility and visual range.

Nesting Bird Avoidance – Pre-Construction Surveys During Nesting Season:

If ground-disturbance, vegetation removal, or other construction activities are scheduled during the nesting season of protected raptors and migratory birds (February 1st to September 30th), a focused survey for active nests of such birds shall be conducted by a qualified biologist within 15 days prior to the beginning to project-related activities. If a lapse in project related work of 15 days or longer occurs, another survey and, if required, consultation with United States Fish and Wildlife Service and California Department of Fish and Wildlife will be required before the work can be reinitiated. Pre-construction surveys for nesting migratory birds and raptors shall be specified under Caltrans 2024 Standard Specification and/or Standard Special Provision 14-6.03A (Species Protection) and/or 14-6.03(B) (Bird Protection).

COMMENT 9: *Appendix B Avoidance, Minimization, and Mitigation Measures, BIO-21 Compensatory Mitigation, Page 58*

Issue: CDFW does not participate in in-lieu-fee programs and cannot accept payments to in-lieu-fee programs as a form of compensatory mitigation.

Recommendation: It is recommended that a form of CDFW-approved compensatory mitigation for impacts to areas subject to section 1602 of the California Fish and Game Code be identified and included in the MND. This may include mitigating at CDFW-approved mitigation or conservation bank, or through other methods, as approved by CDFW.

Caltrans Response to Comment 9:

Appendix B of the Initial Study with Proposed Mitigated Negative Declaration and Section 4(f) De Minimis Determination includes measure *BIO-22. Compensatory Mitigation – Riparian Vegetation*, which discusses that Caltrans proposes to compensate for the loss of 0.01-acre of riparian vegetation with the establishment of 0.03-acre of riparian vegetation at an undetermined onsite (within the project limits) or offsite location. Caltrans will negotiate appropriate mitigation strategies during the California Fish and Game Code Section 1600 Lake and Streambed Alteration Agreement application process.

List of Technical Studies Bound Separately (Volume 2)

Air Quality Memorandum
Noise Compliance Study
Water Compliance Study
Natural Environment Study
Preliminary Hydraulics Floodplain Analysis
Preliminary Floodplain Study Addendum
Historical Property Survey Report
Archaeological Survey Report
Initial Site Assessment
Scenic Resource Evaluation
Paleontology Memorandum
Geotechnical Design Report Memorandum
Community Impact Memorandum
Climate Change Study
Energy Analysis Memorandum

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

Laura Cook
District 10 Environmental Division
California Department of Transportation
1976 East Doctor Martin Luther King Junior Boulevard, Stockton, California 95205

Or send your request via email to: Laura.Cook@dot.ca.gov

Or call: 209-662-2261

Please provide the following information in your request:

Project title: Alpine County State Route 4 Drainage System Restoration
General location information: In Alpine County, along State Routes 4 and 207
District number-county code-route-post mile: 10-ALP-4,207-Post Miles Vary
Project ID number: 10-1L660 / 1020000171