

203 Pavement

On State Route 203 in Mono County, California
9-MNO-203-PM L0.0 to R8.7

Project ID Number: 0919000068

EA Number: 09-38320

**Initial Study
with Proposed Negative Declaration**

Volume 1 of 2



Prepared by the
State of California Department of Transportation

January 2026



General Information About This Document

What's in this document:

The California Department of Transportation (Caltrans) has prepared this Initial Study, which examines the potential environmental impacts of alternatives being considered for the proposed project in Mono County in California. The document explains why the project is being proposed, the alternatives being considered for the project, the existing environment that could be affected by the project, potential impacts of each of the alternatives, and proposed avoidance, minimization, and/or mitigation measures.

What you should do:

- Please read the document. Additional copies of the document and the related technical studies are available for review at the Caltrans District 9 office at 500 South Main Street in Bishop, California 93514, Monday through Friday 8:00 a.m. to 5:00 p.m., and at the Mammoth Lakes Branch Library at 400 Sierra Park Road, Mammoth Lakes, California 93546, Monday through Friday 10:00 a.m. to 7:00 p.m. and Saturday 10:00 a.m. to 5:30 p.m. This document may be downloaded at the following website: <https://dot.ca.gov/caltrans-near-me/district-9/district-9-projects-list/09-38320>.
- Tell us what you think. If you have any comments regarding the proposed project, please send your written comments to Caltrans by February 19, 2026. Submit comments via U.S. mail to: Rebeka Riesen, District 09 Environmental Division, California Department of Transportation, 500 South Main Street, Bishop, California 93514. Submit comments via email to: rebeka.riesen@dot.ca.gov.
- Submit comments by the deadline: February 19, 2026.

What happens next:

After comments are received from the public and the reviewing agencies, Caltrans may 1) give environmental approval to the proposed project, 2) do additional environmental studies, or 3) abandon the project. If the project is given environmental approval and funding is appropriated, Caltrans could design and construct all or part of the project.

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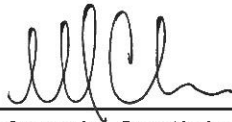
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Preserve pavement, stabilize shoulders, restore drainage facilities, and update other highway features on State Route 203, from post miles L0.0 to R8.7, in Mammoth Lakes (Mono County), California.

**INITIAL STUDY
with Proposed Negative Declaration**

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

THE STATE OF CALIFORNIA
Department of Transportation
and
Responsible Agency: California Transportation Commission



Marcela Castleberry
Acting Deputy District Director, Planning and Environmental Analysis
California Department of Transportation District 9
CEQA Lead Agency

January 8, 2026

Date

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DRAFT

Proposed Negative Declaration

Pursuant to: Division 13, Public Resources Code

State Clearinghouse Number: pending

District-County-Route-Post Mile: 9-MNO-203-PM L0.0 to R8.7

EA/Project Number: EA 09-38320/Project Number 0919000068

Project Description

The California Department of Transportation (Caltrans) proposes to preserve pavement, stabilize shoulders, restore drainage facilities, and update other highway features on State Route 203, from post miles L0.0 to R8.7, in Mammoth Lakes (Mono County), California.

Determination

An Initial Study has been prepared by Caltrans District 9. On the basis of this study, it is determined that the proposed action will not have a significant effect on the environment for the following reasons:

The project would have no effect on agriculture and forestry resources, air quality, cultural resources, energy, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems.

The project would have less than significant effects on aesthetics, biological resources, and greenhouse gas emissions.

Marcela Castleberry
Acting Deputy District Director, Planning and Environmental Analysis
California Department of Transportation District 9

Date

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Chapter 1 Proposed Project

1.1 Introduction

The California Department of Transportation (Caltrans) proposes to preserve pavement, widen shoulders, improve drainage facilities, and make other improvements on State Route 203 from post miles L0.0 to R8.7 in the town of Mammoth Lakes in Mono County. See Figure 1-1 for the project vicinity map and Figure 1-2 for the project location map.

1.2 Purpose and Need

The project “purpose” is a set of objectives the project intends to meet. The project “need” is the transportation deficiency that the project was initiated to address.

1.2.1 Purpose

The purpose of this project is to:

- Preserve, repair, and extend the service life of the pavement and improve ride quality.
- Stabilize shoulders.
- Restore drainage facilities.
- Upgrade pedestrian facilities to meet current standards.
- Enhance traffic safety features.

1.2.2 Need

Pavement

The pavement within the project area is exhibiting extensive cracking and poor ride quality. Given the project elevation, pavement deterioration has been accelerated by annual winter weather conditions. If left untreated, the roadway conditions will continue to deteriorate, and maintenance activities will be required more frequently.

Shoulders

Snow and rainfall have resulted in soil erosion and slope destabilization in specific locations within the project limits. The eroded slopes are producing

rockfall and have exposed tree roots, which could result in rocks or fallen trees in the roadway. Winter snowplowing activities have also impacted existing asphalt concrete dikes in some locations, causing additional damage to the roadway and side slopes in the project area. If left untreated, the shoulders will continue to degrade, which may affect roadway operations.

Drainage

Several existing drainage systems within the project limits are no longer functioning properly. Leaving these drainage facilities untreated would result in shoulder erosion due to water runoff and the potential for icing during winter.

Multimodal Facilities

Existing curb ramps within the project limits do not meet Americans with Disabilities Act standards.

Shoulders within the project area have insufficient widths to support bicycle usage.

Traffic Safety

Existing metal beam guardrails within the project limits do not meet current Manual for Assessing Safety Hardware standards and need to be replaced.

The existing striping configuration has resulted in inefficient highway operations at the intersection of State Route 203 and southbound U.S. Route 395.

1.3 Project Description

Caltrans proposes to preserve the pavement in a state of good repair, widen shoulders, improve drainage facilities, lay back existing cut slopes, and replace or upgrade existing roadway elements to ensure that they meet current standards.

Pavement

Pavement is proposed to be rehabilitated to a state of good repair from post miles L0.1 to R7.78, including superelevation correction on the eastbound lane curve near post mile 7.4. New striping, pavement markings, and rumble strips would be placed on the new pavement surfaces.

Approximately 14 census loops embedded in the existing pavement would be removed and replaced during pavement work.

Shoulder Widening

Shoulder widening is proposed in three locations:

- From post miles L0.25 to L0.46, the existing westbound shoulder would be widened to provide a 4-foot-wide bicycle lane between the Mammoth Mountain Inn and a Mammoth Mountain access road.
- From post miles R3.77 to R4.47, the existing eastbound shoulder would be widened to provide a 4-foot-wide bicycle lane between Mammoth Scenic Loop Road and Forest Trail Road.
- From post miles 7.50 to 7.73, an existing rock outcrop at post mile 7.51 and post mile 7.70 would be removed from the existing eastbound shoulder to provide a standard 8-foot-wide shoulder.

Drainage Improvements

Several culverts would be addressed within the project limits, as shown in Table 1.1 below.

Table 1.1 Culverts To Be Addressed Within the Project Limits

Post Miles	Description of Work
L0.22	Remove and replace the culvert, add a flared end section at the inlet and outlet, and add rock slope protection.
L0.47	Replace the culvert in kind.
R0.71	Replace the existing 12-inch diameter culvert with a 24-inch culvert and upgrade the existing drainage inlet.
R1.2	Replace the culvert in kind and add rock slope protection to the outlet.
R1.26	Replace the existing culvert in kind and add rock slope protection to the outlet.
R2.41	Replace the existing overside drain and add rock slope protection.
R3.55	The existing slotted drain system and drainage inlet would be removed to expose the existing corrugated steel pipe.
R3.60	Replace the culvert and extend the inlet by 3 feet, add a flared end section, and add rock slope protection.
R4.47	A new drop inlet would be installed to connect to the existing drop inlet on the northwest corner of Forest Trail Road.
R4.77	Replace two culverts in kind and add rock slope protection.
5.06	Replace two culverts in kind.
5.19	Replace one culvert in kind.

Additionally, existing asphalt concrete dikes that have been damaged by snowplow operations would be replaced throughout the project limits.

Cut Slopes

Four existing cut slopes are proposed to be laid back to reduce erosion and rockfall concerns. The cut slopes to be improved include the following:

- From post miles R3.07 to R3.21 and from post miles R3.51 to R3.59, a new 4-foot-wide side gutter would be installed in conjunction with the slope work to prevent erosion at the top of the new slope.
- From post miles 7.50 to 7.53 and post miles 7.68 to 7.73, the existing rock outcrop would be removed from the existing eastbound shoulder, and the slope would be laid back.

Traffic Safety Features

Existing nonstandard guardrail would be upgraded to the Midwest Guardrail System, including appropriate terminal sections, at the following locations:

- Post miles 6.20 to 6.42 on the westbound lanes.
- Post miles 7.04 to 7.06 on the eastbound lanes, next to the existing changeable message sign.

A radar speed feedback sign would be replaced on the westbound lane of State Route 203 at approximately post mile 6.11. This radar speed feedback sign would be moved away from the highway to avoid snow splashing during winter conditions.

Multimodal Facilities

Many of the existing curb ramps within the town of Mammoth Lakes do not comply with Caltrans' Americans with Disabilities Act standards and must be replaced. In addition to replacing the curb ramps themselves, some associated work would be required to connect the new curb ramps to the existing sidewalks and roadway. The proposed locations for curb ramp installations and replacements are shown in Table 1.2 below.

Table 1.2 Proposed Locations for Curb Ramp Installations and Replacements

Post Mile	Location	Proposed Work
4.78	Southwest corner of Minaret Road	Remove and replace the curb ramp
4.78	Southeast corner of Minaret Road	Construct curb ramp
5.25	Existing multiuse path landing opposite the northeast corner of Sierra Boulevard	Construct curb ramp
5.25	Northeast corner of Sierra Boulevard	Construct curb ramp
5.31	Northwest corner of the Motel 6 entrance	Construct curb ramp
5.31	Northeast corner of the Motel 6 entrance	Construct curb ramp
5.42	Northwest corner of the post office entrance	Construct curb ramp
5.61	Northwest corner of the Mammoth Lakes Fire Department entrance	Construct curb ramp
5.63	Northeast corner of the Mammoth Lakes Fire Department entrance	Construct curb ramp
5.66	Mid-block opposite Laurel Mountain Road	Construct curb ramp
5.66	Southeast corner of Laurel Mountain Road	Construct curb ramp
5.75	Northeast corner of Old Mammoth Road	Construct curb ramp
5.84	Southeast corner of Sierra Park Road	Remove and replace the curb ramp

In addition to curb ramps, the layout of the interchange between State Route 203 and U.S. Route 395 would be reconfigured by modifying striping, pavement markings, and signage. The southbound U.S. Route 395 on-ramp from eastbound State Route 203 would be reduced to one lane to create a wider outside shoulder for bicyclists. A striped bicycle lane on eastbound State Route 203 would also be provided to convey bicyclists to the on-ramp. The southbound U.S. Route 395 off-ramp would be realigned to square up the intersection with westbound State Route 203.

Figure 1-1 Project Vicinity Map

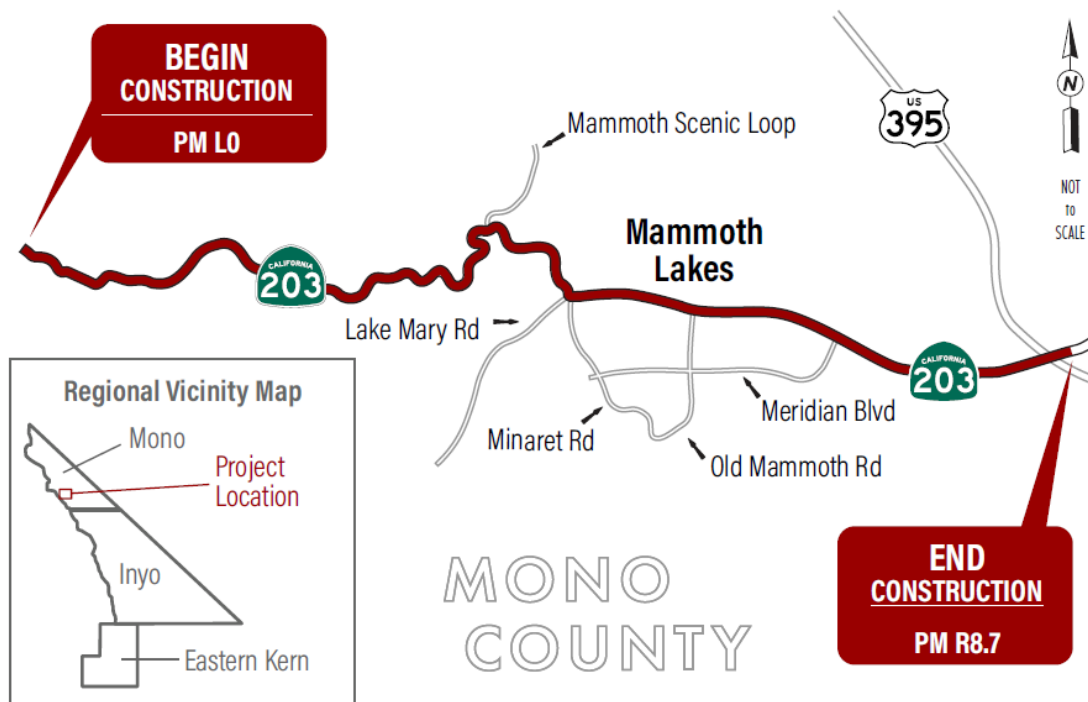
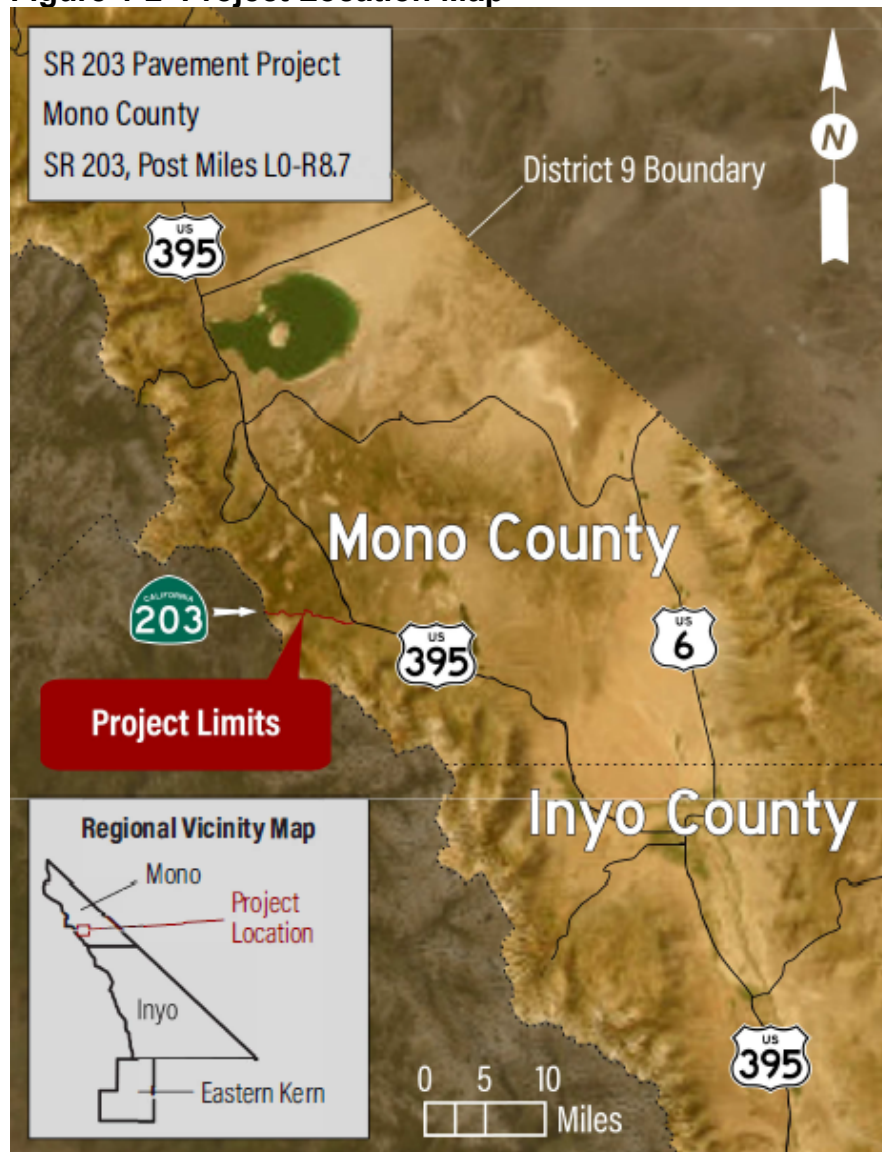


Figure 1-2 Project Location Map



1.4 Project Alternatives

One build alternative and one no-build alternative are under consideration for the project.

1.4.1 Build Alternatives

The build alternative would preserve pavement, widen shoulders, upgrade drainage facilities, and make other improvements within the project area. For a detailed description of this work, refer to Section 1.3 (Project Description).

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 would maintain the existing facilities within the project limits on State Route 203 in their current condition. Selection of the no-build alternative would result in no project-related construction activities taking place. The no-build alternative would not meet the project purpose and need because it would not address pavement, shoulder stability, drainage facilities, pedestrian facilities, or traffic safety measures on the proposed segment of State Route 203 within the project limits.

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

This project includes a list of Caltrans standard measures that are typically used on all Caltrans projects. Caltrans standard measures are considered features of the project and are evaluated as part of the project. Caltrans standard measures are not implemented to address any specific effects, impacts, or circumstances associated with the project but are instead implemented as part of the project’s design to address common issues encountered on resources and are applicable to the project. These measures can be found in Caltrans’ 2024 Standard Specifications.

- 7-1 Legal Relations and Responsibility to the Public
- 10-4 Water Usage
- 10-5 Dust Control
- 10-6 Watering
- 12-1 Temporary Traffic Control
- 12-3 Temporary Traffic Control Devices
- 12-4 Traffic Control Systems
- 13-1 Water Pollution Control
- 13-2 Water Pollution Control Program
- 13-4 Job Site Management
- 13-6 Temporary Sediment Control

- 13-7 Temporary Tracking Control
- 13-10 Temporary Linear Sediment Barriers
- 14-1 Environmental Stewardship
- 14-2 Cultural Resources
- 14-6 Biological Resources
- 14-7 Paleontological Resources
- 14-8 Noise and Vibration
- 14-9 Air Quality
- 14-10 Solid Waste Disposal and Recycling
- 14-11 Hazardous Waste and Contamination
- 14-12 Other Agency Regulatory Requirements
- 17-2 Clearing and Grubbing
- 18-1 Dust Palliatives
- 20-1 Landscape
- 20-3 Planting
- 20-4 Plant Establishment Work
- 21-2 Erosion Control Work

Additional standard measures will be added to the project as necessary or appropriate.

1.6 Discussion of the NEPA Categorical Exclusion

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

1.7 Permits and Approvals Needed

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

Agency	Permit/Approval	Status
California Department of Fish and Wildlife	Section 1602 Lake and Streambed Alteration Agreement	Notification to be sent before construction starts.
Lahontan Regional Water Quality Control Board	Section 401 Water Quality Certification	Application to be submitted before construction starts.
U.S. Fish and Wildlife Service	Programmatic Biological Opinion	To be obtained before construction starts.

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 Visual Impact Analysis Memorandum dated October 27, 2025, 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 area is overall characterized by hilly terrain and includes views of Mammoth Mountain and the Sherwin Range. Vegetation in the area consists primarily of densely vegetated coniferous forests along the slopes, willows and mountain alders in riparian areas, and sagebrush-bitterbrush scrub communities in lower elevations. The combination of dense vegetation and residential landscape through town makes for a unique country environment.

Environmental Consequences

The proposed cut slopes may result in the removal of approximately 170 mixed coniferous trees on the western and eastern ends of the project in densely wooded areas. Visual impacts are anticipated to be low to moderate due to the existing dense vegetation beyond the cut slopes. Minimal or no elements would be added that would affect existing views. Project elements would not alter the appearance of the route and would be visually consistent with the character of the route and project area.

Avoidance, Minimization, and/or Mitigation Measures

The following avoidance, minimization, and/or mitigation measures are proposed for the project:

VIS-1: Preservation of existing vegetation should be implemented to the maximum extent feasible.

VIS-2: Pruning or tree removal may be supervised by a contractor-supplied International Society of Arboriculture-certified arborist.

VIS-3: Erosion control seeding would be applied to all areas of disturbance where they are beyond paved areas.

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.

Based on a search of the California Department of Conservation's Important Farmland Mapping Tool, there are no designated Prime, Unique, or Farmlands of Statewide importance in or near the project limits. The project will not have any effects on the protected farmlands, including those under the Williamson Act (<https://maps.conservation.ca.gov/dlrp/ciff>).

Impacts to timberland are analyzed as required by the California Timberland Productivity Act of 1982 (California Government Code Section 51100 et seq.), which was enacted to preserve forest resources. Searches of the California Department of Forestry and Fire Protection website and the California Department of Conservation website show no designated timberlands or Timber Protection Zones in or near the project vicinity.

Question—Would the project:	CEQA Significance Determinations for Agriculture and Forestry Resources
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact

Question—Would the project:	CEQA Significance Determinations for Agriculture and Forestry 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?	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?	No Impact

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, Noise, Hazardous Waste, Water, and Paleontology Memorandum dated December 22, 2025, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Air Quality
a) Conflict with or obstruct implementation of the applicable air quality plan?	No Impact
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	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 January 7, 2026, the following significance determinations have been made:

Question—Would the project:	CEQA Significance Determinations for Biological Resources
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, or National Oceanic and Atmospheric Administration Fisheries?	Less Than Significant Impact
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
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?	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact

Affected Environment

The Natural Environment Study establishes the biological study area as all areas where potential temporary or permanent impacts may occur, with a buffer zone

to accommodate project changes. The biological study area was delineated to ensure all species and habitats with the potential to occur within the project impact area, including potential access routes and staging areas, were properly surveyed to assess potential impacts of proposed project activities.

This project lies west of the White Mountains, the Long Valley caldera, and the Glass Mountains, and is situated at the eastern base of the Sierra Nevada Mountains. Habitats in this area can be characterized as high desert natural communities that are part of the southern portion of the Great Basin Province, where pine forest and sagebrush scrub communities can be observed. At elevations ranging from 7,300 to 9,200 feet above sea level, temperatures in this region are highly variable, with an average low of 29 degrees Fahrenheit and an average high of 56 degrees Fahrenheit.

Question a): Special-Status Plant and Animal Species

Migratory and Nesting Birds

According to the federal Migratory Bird Treaty Act, it is unlawful to pursue, hunt, take, capture, or kill; attempt to take, capture, or kill; or possess or sell migratory birds. The law also applies to live and dead birds and grants full protection to any bird parts, including feathers, eggs, and nests. The Migratory Bird Treaty Act protects over 800 species of birds that occur in the U.S. The law protects all species of nesting birds. No special-status bird species or nests were observed during field surveys.

Whitebark Pine

The whitebark pine is listed as a threatened species under the Federal Endangered Species Act. This species defines the upper tree line of the Sierra Nevada and is a keystone species in California's subalpine forests. The whitebark pine occurs in subalpine forest habitats with steep slopes, poorly developed granitic soils, and snow.

Question b): Natural Communities of Special Concern

Aquatic Resources

Waters, wetlands, and riparian habitats have various protections and permit requirements under state and federal agencies, including the California Department of Fish and Wildlife, the U.S. Army Corps of Engineers, and the Regional Water Quality Control Board.

One intermittently flowing streambed is present in the project impact area and the biological study area. This channel is an episodic wash that occurs along the roadside and does not contain flowing water most of the year.

Environmental Consequences

Response to a) Less Than Significant Impact: Special-Status Animal and Plant Species

Migratory and Nesting Birds

Noise, vibration, and human activities could disturb nesting birds and cause behavior changes, leading to birds becoming stressed and abandoning nests. No nesting birds were observed during surveys, and this section of State Route 203 experiences high levels of recreational use. Impacts associated with the proposed project on migratory and nesting birds are anticipated to be similar to existing conditions.

Whitebark Pine

Approximately 2.5 acres of highly degraded whitebark pine habitat may be impacted by construction activities at post miles L0.25 to L0.46, R3.07 to R3.21, R3.51 to R3.59, and R3.77 to R4.47. These areas are directly next to the existing infrastructure of State Route 203 and experience regular snow removal and human activity. These areas do not represent high-quality whitebark pine habitat.

The removal of one whitebark pine near post mile L0.35 would occur to accommodate the proposed shoulder widening. This individual is immature and does not yet produce cones. No other project activities would impact whitebark pine individuals.

Response to b) Less Than Significant Impact: Natural Communities of Special Concern

Aquatic Resources

The proposed project would require work within a California Department of Fish and Wildlife Section 1602 resource for the 4 feet long culvert extension and flared end section installation at post mile L0.22. Temporary impacts from foot traffic may occur approximately 5 feet from the end of the culvert extension. Permanent impacts are estimated to be less than one-tenth of an acre, resulting from the culvert extension and installation of the new flared end section.

Avoidance, Minimization, and/or Mitigation Measures

The following avoidance, minimization, and/or mitigation measures are proposed for the project:

Question (a): Migratory and Nesting Birds

BIO-1: If project construction occurs between February 1 and September 30, preconstruction nesting bird surveys would be conducted by Caltrans or a consultant biologist. Additional minimization measures, if necessary, would be determined on a case-by-case basis.

Question (a): Whitebark Pine

BIO-2: Vegetation removal would be limited to the greatest extent possible.

BIO-3: Erosion control measures would use hydroseed composed of five to six species of native grass and shrubs to limit erosion.

Question (b): Aquatic Resources

BIO-4: A Section 1602 Lake and Streambed Alteration Agreement notification will be submitted to the California Department of Fish and Wildlife.

BIO-5: All measures included in the Section 1602 Lake and Streambed Alteration Agreement, if issued, will be implemented.

2.1.5 Cultural Resources

Considering the information in the Archaeological Survey Report and the Historic Property Survey Report dated January 2026, the following significance determinations have been made:

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

2.1.6 Energy

Considering the information in the Climate Change Analysis dated October 20, 2025, 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 Air, Noise, Water, Hazardous Waste, and Paleontology Memorandum dated December 22, 2025, 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
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 wastewater disposal systems where sewers are not available for the disposal of wastewater?	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 Air, Noise, Water, Hazardous Waste, and Paleontology Memorandum dated December 22, 2025, and the Climate Change Analysis dated October 20, 2025, 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 Mono County and next to the town of Mammoth Lakes on State Route 203. The project is in a rural area with a tourism-based economy. State Route 203 is the main transportation route to and from town. The Regional Transportation Commission guides transportation planning in this area, and the Mono County Regional Transportation Plan addresses greenhouse gas emissions in the project area.

Environmental Consequences

Response to a) Less Than Significant Impact

Construction emissions cannot be avoided with any construction process, and construction activities will generate some level of emissions. The project will take an estimated 140 working days to complete, with a potential start date in the year 2029. Construction-related greenhouse gas emissions were calculated using the Caltrans Construction Emissions Tool. The tool was developed to use Caltrans-specific equipment activity data and the best available equipment emissions information to improve estimates of transportation-related construction emissions, fuel consumption, and electricity consumption, and to support transportation and air quality planning.

During construction, the project is estimated to emit 282 tons of carbon dioxide, with an average of 5.25 tons of carbon dioxide emitted per day.

While some greenhouse gas emissions during the construction period would be unavoidable, no increase in operational greenhouse gas emissions is expected once construction is complete. The project will not increase the vehicle capacity of the roadway. This type of project generally causes minimal or no increase in operational greenhouse gas emissions.

Avoidance, Minimization, and/or Mitigation Measures

The following avoidance and minimization measures are proposed for the project:

GHG-1: Limit idling to 5 minutes for delivery and dump trucks and other diesel-powered equipment.

GHG-2: Schedule truck trips outside peak morning and evening commute hours.

GHG-3: Use recycled water or reduce consumption of potable water for construction.

2.1.9 Hazards and Hazardous Materials

Considering the information in the Air, Noise, Hazardous Waste, Water, and Paleontology Memorandum dated December 22, 2025, 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 0.25 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 2 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

Question—Would the project:	CEQA Significance Determinations for Hazards and Hazardous Materials
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 Air, Noise, Hazardous Waste, Water, and Paleontology Memorandum dated December 22, 2025, 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

Question—Would the project:	CEQA Significance Determinations for Hydrology and Water Quality
(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 project's scope, 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 project's scope, 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

Question—Would the project:	CEQA Significance Determinations for Mineral Resources
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 Air, Noise, Hazardous Waste, Water Quality, and Paleontology Memorandum dated December 22, 2025, 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
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 2 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 Impacts Memorandum dated October 20, 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

Question—Would the project:	CEQA Significance Determinations for Population and Housing
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 Impacts Memorandum dated October 20, 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 Impacts Memorandum dated October 20, 2025, 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?	No Impact

2.1.17 Transportation

Considering the information in the Community Impacts Memorandum dated October 20, 2025, 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?	No Impact

2.1.18 Tribal Cultural Resources

Considering the information in the Archaeological Survey Report dated January 2026 and the Historic Property Survey Report dated January 2026, the following significance determinations have been made:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined

in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

2.1.19 Utilities and Service Systems

Considering the project's scope, in conjunction with nearby utilities and service systems, 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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No Impact
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No Impact

Question—Would the project:	CEQA Significance Determinations for Utilities and Service Systems
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 Climate Change Analysis dated October 20, 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 that may result in temporary or ongoing impacts to the environment?	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No Impact

2.1.21 Mandatory Findings of Significance

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

Appendix A Title VI Policy Statement

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

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September 2025

TITLE VI/NON-DISCRIMINATION POLICY STATEMENT

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

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

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


Dina El-Tawansy (Sep 12, 2025 16:52:12 PDT)

DINA A. EL-TAWANSY
Director

"Improving lives and communities through transportation."

Appendix B Draft Section 4(f) De Minimis Evaluation

Introduction

The purpose of this memo is to document the potential eligibility and findings made for Section 4(f) resources located within the limits of the 203 Pavement project, as required per Section 4(f) of the Department of Transportation Act (49 U.S. Code Section 303). The state has determined that this project has no significant impacts on the environment as defined by the National Environmental Policy Act (NEPA) and that there are no unusual circumstances as described in Title 23 of the Code of Federal Regulations Section 771.117 (b). As such, the project is categorically excluded from requirements to prepare an Environmental Assessment or Environmental Impact Statement under NEPA. The state has been assigned and hereby certifies that it has carried out the responsibility to make this determination pursuant to Chapter 3 of Title 23 U.S. Code Section 326 and the Memorandum of Understanding dated April 18, 2019, executed between the Federal Highway Administration and the state.

Section 4(f) of the Department of Transportation Act of 1966, codified in federal law at 49 U.S. Code Section 303, declares that “it is the policy of the U.S. Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites.”

Section 4(f) specifies that the U.S. Secretary of Transportation may approve a transportation program or project “requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site) only if: Section 4(f) further requires coordination with the U.S. Department of the Interior and, as appropriate, the involved offices of the U.S. Department of Agriculture and the U.S. Department of Housing and Urban Development in developing transportation projects and programs that use lands protected by Section 4(f).” If historic sites are involved, then coordination with the State Historic Preservation Officer is also needed.

Responsibility for compliance with Section 4(f) has been assigned to the California Department of Transportation pursuant to 23 U.S. Code Sections 326 and 327, including determinations and approval of Section 4(f) evaluations, as well as coordination with agencies that have jurisdiction over a Section 4(f) resource that may be affected by a project action.

Project Description

This State Highway Operation and Protection Program (SHOPP) Capital Preventive Maintenance (CAPM) Pavement project proposes to restore pavement to a state of good repair, widen shoulders, improve drainage facilities, lay back existing cut slopes, and replace or upgrade existing roadway elements to ensure they meet current standards.

Pavement

Pavement is proposed to be rehabilitated using multiple methods to restore the pavement to a state of good repair from post miles L0.1 to R7.78. New striping, pavement markings, and rumble strips would be placed on new pavement surfaces.

Shoulder Widening

Shoulder widening is proposed at three locations:

- From post miles R0.25 to R0.46, the existing westbound shoulder would be widened to provide a 4-foot-wide bicycle lane between the Mammoth Mountain Inn and a Mammoth Mountain access road.
- From post miles R3.77 to R4.47, the existing eastbound shoulder would be widened to provide a 4-foot-wide bicycle lane between Mammoth Scenic Loop Road and Forest Trail Road.
- From post miles 7.50 to 7.73, an existing rock outcrop at post mile 7.51 and post mile 7.70 would be removed from the existing eastbound shoulder to provide a standard 8-foot-wide shoulder.

Drainage Improvements

Several culverts would be addressed within the project limits, as shown in Table 2.1 below.

Table 2.1 Culverts To Be Addressed Within the Project Limits

Post Miles	Description of Work
L0.22	Remove and replace the culvert, add flared end sections at the inlet and outlet, and add rock slope protection.
L0.47	Replace the culvert in kind.
R0.71	Replace the existing 12-inch-diameter culvert with a 24-inch culvert and upgrade the existing drainage inlet.
R1.20	Replace the culvert in kind and add rock slope protection at the outlet.
R1.26	Replace the existing culvert in kind and add rock slope protection at the outlet.
R2.41	Replace the existing overside drain and add rock slope protection.
R3.55	Remove the existing slotted drain system and drainage inlet to expose the existing corrugated steel pipe.
R3.60	Replace one culvert, extend the inlet by 3 feet, add a flared end section at the inlet, and add rock slope protection.
R4.47	Install a new drop inlet to connect to the existing drop inlet at the northwest corner of Forest Trail Road.
R4.77	Replace two culverts in kind and add rock slope protection.
5.06	Replace two culverts in kind.
5.19	Replace one culvert in kind.

Cut Slopes

Four existing cut slopes are proposed to be laid back to reduce erosion and rockfall concerns.

The cut slopes to be improved include:

- From post miles R3.07 to R3.21 and from post miles R3.51 to R3.59, a new 4-foot-wide side gutter would be installed in conjunction with the slope work to prevent erosion at the top of the new slope.
- From post miles 7.50 to 7.53 and from post miles 7.68 to 7.73, the existing rock outcrop would be removed from the existing eastbound lane, and the slope would be laid back.

Traffic Safety Features

Existing nonstandard guardrail would be upgraded to the Midwest Guardrail System, including appropriate terminal sections, at the following locations:

- From post miles 6.20 to 6.42 on the westbound lanes.
- From post miles 7.04 to 7.06 on the eastbound lanes, near the existing changeable message sign.

A radar speed feedback sign would be replaced on the westbound lane of State Route 203 at approximately post mile 6.11. This radar speed feedback

sign would be relocated farther from the highway to avoid snow splashing during winter conditions.

Multimodal Facilities

Many of the existing curb ramps in the town of Mammoth Lakes do not comply with Caltrans' Americans with Disabilities Act standards and must be replaced. In addition to replacing the curb ramps, some associated work would be required to tie the new curb ramp into the existing sidewalks and roadway.

Table 2.2

Post Mile	Location	Proposed Work
4.78	Southwest corner of Minaret Road	Remove and replace the curb ramp
4.78	Southeast corner of Minaret Road	Construct curb ramp
5.25	Existing multiuse path landing opposite the northeast corner of Sierra Boulevard	Construct curb ramp
5.25	Northeast corner of Sierra Boulevard	Construct curb ramp
5.31	Northwest corner of the Motel 6 entrance	Construct curb ramp
5.31	Northeast corner of the Motel 6 entrance	Construct curb ramp
5.42	Northwest corner of the post office entrance	Construct curb ramp
5.61	Northwest corner of the Mammoth Lakes Fire Department entrance	Construct curb ramp
5.63	Northeast corner of the Mammoth Lakes Fire Department entrance	Construct curb ramp
5.66	Mid-block opposite Laurel Mountain Road	Construct curb ramp
5.66	Southeast corner of Laurel Mountain Road	Construct curb ramp
5.75	Northeast corner of Old Mammoth Road	Construct curb ramp
5.84	Southeast corner of Sierra Park Road	Remove and replace the curb ramp

The layout of the interchange with U.S. Route 395 would be reconfigured through modifications to striping, pavement markings, and signage. The southbound U.S. Route 395 on-ramp from eastbound State Route 203 would be replaced with a single lane, and the existing lane drop would be removed, creating a wider outside shoulder for bicyclists. A striped bicycle lane on eastbound State Route 203 would also be provided to convey bicyclists through the on-ramp. The southbound U.S. Route 395 off-ramp would be realigned to better align the intersection with westbound State Route 203.

Section 4(f) Analysis: *De Minimis* Determination (January 19, 2025)

This section of the document discusses *de minimis* impact determinations under Section 4(f). Section 6009(a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) amended Section 4(f) legislation at 23 U.S. Code Section 138 and 49 U.S. Code Section 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 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. FHWA's final rule on Section 4(f) *de minimis* findings is codified in Title 23 of the Code of Federal Regulations Sections 774.3 and 774.17.

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

Properties subject to the provisions of Section 4(f) are publicly owned parks and recreation areas; wildlife and waterfowl refuges of national, state, or local significance; and historic sites of national, state, or local significance. The proposed project would result in the use of U.S. Forest Service-designated public recreational land. It has been determined that Section 4(f) applies to the project, as the above-referenced areas are designated U.S. Forest Service public recreational land. In addition, the 203 Pavement project is federally funded (Federal Highway Administration) and subject to the conditions set forth under Section 4(f).

U.S. Forest Service Recreational Land (Two Locations)

The Resource

The U.S. Forest Service has designated recreational land throughout the project area. Two right-of-way acquisitions would occur within this designated recreational land. The first location extends from post miles R3.07 to R3.21 and encompasses about 0.21 acre of land. The second location extends from post miles R3.51 to R3.59 and encompasses about 1.59 acres of land. With a combined area of approximately 1.8 acres, the land is designated as recreational land under the Sustainable Recreational Management Plan and is maintained by the U.S. Forest Service.

The 203 Pavement project would incorporate two sections next to State Route 203 into Caltrans' right-of-way. No temporary or proximity impacts to this resource are expected as a result of the 203 Pavement project. Figures 1 and 2 show maps of sections of the 203 Pavement project area. The blue segments represent U.S. Forest Service land proposed for acquisition.

Figure 1 U.S. Forest Service Land To Be Acquired



Figure 2 U.S. Forest Service Land To Be Acquired



De Minimis Impacts

This section of the document discusses *de minimis* impact determinations under Section 4(f). Section 6009(a) of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) amended Section 4(f) legislation at 23 U.S. Code Section 138 and 49 U.S. Code Section 303 to simplify the processing and approval of projects that have only *de minimis* impacts on land protected under Section 4(f). This amendment provides that once the U.S. Department of Transportation (USDOT) determines that a transportation use of 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. FHWA's final rule on Section 4(f) *de minimis* findings is codified in Title 23 of the Code of Federal Regulations, Sections 774.3 and 774.17.

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

The two sections of State Route 203 that occur within the area of potential effect of the proposed project are listed as recreational land under the Sustainable Recreational Management Plan administered by the U.S. Forest Service. These two sections constitute minimal acquisitions intended to enhance roadway facilities to accommodate winter snowplowing activities and to stabilize slopes to prevent tree and rock fall.

Based on the work described above, the project has been determined to result in *de minimis* impacts to the two locations owned by the U.S. Forest Service. Based on these criteria, Caltrans anticipates receiving a Section 4(f) *de minimis* use concurrence from the U.S. Forest Service.

The two sections of State Route 203 that occur within the area of potential effect of the proposed project are listed as recreational land under the Sustainable Recreational Management Plan administered by the U.S. Forest Service. The Inyo National Forest contains approximately 45,562 acres of Roaded Modified Recreation land. The two sections of U.S. Forest Service land proposed for acquisition account for about 1.8 acres of designated recreational land. These minimal acquisitions would enhance travel conditions and reduce erosion and rockfall in the area.

Public Notification Period (January 19, 2026, to February 19, 2026)

Prior to making Section 4(f) *de minimis* determinations, the Code of Federal Regulations (Title 23 of the Code of Federal Regulations Section 774.5(b)(2)(i)) requires that “public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property must be provided. This requirement can be satisfied in conjunction with other public involvement procedures, such as a comment period provided on a NEPA document.”

It has been determined that the proposed project meets the criteria for a categorical exclusion under NEPA. Typically, Section 4(f) evaluations are included as an appendix in publicly circulated NEPA documents, such as Environmental Assessments or Environmental Impact Statements. To meet the public notification requirements of the above-cited Code of Federal Regulations, this standalone Section 4(f) memorandum to file would be publicly circulated. A CEQA Initial Study/Proposed Negative Declaration has been prepared for the 203 Pavement project. Under CEQA, this level of environmental documentation is required to circulate for 30 days for public review and comment. **This memorandum, detailing the Section 4(f) analysis of U.S. Forest Service-designated recreational land, would circulate concurrently with the CEQA Initial Study from January 19, 2026, to February 19, 2026. Members of the public would have the opportunity to review and comment on the findings of this memorandum.**

After the public review and comment period has passed, “the official(s) with jurisdiction over Section 4(f) resources must concur in writing that the project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection. This concurrence may be combined with other comments on the project provided by the official(s).” Because the U.S. Forest Service owns both designated recreational areas, concurrence would be sought from the U.S. Forest Service once the public comment period ends on February 19, 2026. This section would be updated once concurrence has been obtained to list and address any additional comments received from the public.

List of Technical Studies Bound Separately (Volume 2)

Air, Noise, Water, Hazardous Waste, Paleontology Memorandum. Caltrans, December 22, 2025.

Archaeological Survey Report. Caltrans, January 2026.

Community Impacts Memorandum. Caltrans, October 20, 2025.

Climate Change Analysis. Caltrans, October 20, 2025.

Historic Property Survey Report. Caltrans, January 2026.

Natural Environment Study. Caltrans, January 7, 2025.

Visual Impact Assessment Memorandum. Caltrans, October 27, 2025.

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

Rebeka Riesen
District 9 Environmental Division
California Department of Transportation
500 South Main Street
Bishop, California 93514

Or send your request via email to: rebeka.riesen@dot.ca.gov

Or call: 442-359-8454

Please provide the following information in your request:

Project title: 203 Pavement

General location information: In Mono County, from the Madera–Mono County line to U.S. Route 395

District number-county code-route-post mile: 09-MNO-203-PM L0.0-R8.7

Project ID number: 0919000068