



May 9, 2023

Jerry Bajwa
Bajwa Group of Companies
800 North Haven Avenue, Suite 428
Ontario, CA 91764

Subject: Biological Resources Assessment of the Cajon Pass Commercial Retail Project,
Unincorporated Community of Devore, San Bernardino County, California

Dear Mr. Bajwa:

The purpose of this Biological Resources Technical Memorandum is to describe and document potential impacts to biological resources—including sensitive and special-status species—associated with the implementation of the proposed Cajon Pass Commercial Retail Project (project) within Assessor’s Parcel Number 0351-171-55, in the unincorporated community of Devore, San Bernardino County, California. This technical information is provided for project review under the California Environmental Quality Act (CEQA), the California Endangered Species Act (CESA), and the federal Endangered Species Act (FESA).

PROJECT DESCRIPTION

The proposed project includes development of a convenience store, a gasoline station, and a drive-through car wash on 1.42 acres. The proposed on-site structures include a 4,900-square foot convenience store, a 67-foot by 84-foot canopy with 9 multiple product dispensers for fueling up to 18 vehicles, 2 underground fuel storage tanks southwest of the canopy, a 22-foot by 44-foot drive-through car wash, and 8 Tesla electric vehicle charging stations with charging posts and cabinets in the southern corner of the site. The project includes 18 additional automobile parking stalls, 2 of which are designed in accordance with the Americans with Disabilities Act, a separate loading area for the convenience store, and a trash enclosure facility. The project site will have 18,395 square feet of landscaping that will include trees, shrubs, groundcover, and shrub mass (see Figure 1, Regional and Project Location; all figures are provided in Attachment A).

PROJECT SETTING

The project site, consisting of 1.42 acres, is approximately 1,450 feet southeast of the State Route 138 and Wagon Train Road intersection as shown in the *Cajon, California* 7.5-minute United States Geological Survey (USGS) topographic quadrangle map. Historically, the site has consisted of undeveloped land through at least 2002, when the site was graded to its current configuration. Seepage pits were installed on the project site between 2003 and 2005 as part of a system for wastewater treatment for the adjacent businesses and are still present on the project site. Two large storage containers were present on the northern portion of the project site, immediately surrounded by recent disturbance. As such, the site is highly disturbed. The project site is adjoined by Wagon Train Road, followed by undeveloped land to the northeast, undeveloped land to the southeast, undeveloped land followed by Interstate (I) 15 to the southwest, and a McDonald’s restaurant to the northwest.

METHODS

Literature Review and Records Search

LSA Biologist Jeremy Rosenthal conducted a literature review and record search on November 15, 2021, to identify the existence and potential for occurrence of sensitive or special-status plant and animal species¹ in the vicinity of the project site. Due to the age of the original recorded search, an updated record search was conducted on April 24, 2023. Mr. Rosenthal also examined federal and State lists of sensitive species. Current electronic database records reviewed included the following:

- **California Natural Diversity Database information (CNDDDB – RareFind 5)**, which is administered by the California Department of Fish and Wildlife (CDFW). This database covers sensitive plant and animal species as well as sensitive natural communities that occur in California. Records from two USGS quadrangles within 3 miles of the project site (*Cajon and Telegraph Peak*) were obtained from this database to assist with the field survey.

In addition to the database listed above, the review included historic and current aerial imagery, existing environmental reports for developments in the project vicinity, regional habitat conservation plans, and local land use policies related to biological resources.

Field Survey

LSA Biologist Jeremy Rosenthal conducted a general biological survey of the project site on November 11, 2021, from 10:00 a.m. to 11:30 a.m. He surveyed the entire project site on foot and noted all biological resources observed. He noted suitable habitat for any species of interest or concern and photographed general site conditions. The weather conditions were calm with scattered clouds, winds from 1 to 2 miles per hour, and 71° Fahrenheit. Representative site photographs are provided in Attachment B.

RESULTS

Habitat/Vegetation

The project site consists of ornamental landscaping and disturbed/ruderal vegetation with sparse patches of native plant species (see Figure 2, Vegetation and Critical Habitat). Ongoing soil disturbance and the resulting competitive exclusion by invasive nonnative plants limit the potential for native flora to occur on the project site. Attachment C provides a complete list of plant species identified within the proposed project site.

¹ For the purposes of this report, the term “special-status species” refers to those species that are listed or proposed for listing under the CESA and/or FESA; California Fully Protected Species; plants with a California Rare Plant Rank of 1, 2, or 3; California Species of Special Concern; and California Special Animals. It should be noted that “Species of Special Concern” and “California Special Animal” are administrative designations made by the CDFW and carry no formal legal protection status. However, Section 15380 of the State CEQA Guidelines indicates that these species should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

- **Disturbed Riversidian sage scrub (Approximately 0.04 acre):** Disturbed Riversidian sage scrub predominantly consists of a sparse occurrence of native species intermixed with nonnative species, including gazania (*Gazania linearis*), ripgut brome (*Bromus diandrus*), red-stem filaree (*Erodium cicutarium*), and Russian thistle (*Salsola tragus*). The aforementioned nonnative species provide negligible desirable habitat for native wildlife species. Native species within the Disturbed Riversidian sage scrub include California buckwheat (*Eriogonum fasciculata*) and common rabbitbrush (*Ericameria nauseosa*). Disturbed Riversidian sage scrub occurs on the northeastern portion of the project site.
- **Ornamental Landscaping (Approximately 0.06 acre):** Ornamental landscaping predominantly consists of nonnative ornamental species that do not provide desirable habitat for native wildlife species. Ornamental landscape plants within this area include pine trees (*Pinus* sp.) and gazania. Ornamental landscaping occurs on the northwestern portion of the project site.
- **Disturbed/ruderal (Approximately 1.4 acres):** Disturbed/ruderal vegetation predominantly consists of nonnative species that do not provide desirable habitat for native wildlife species. Vegetation within these areas include gazania, field mustard (*Brassica rapa*), buckhorn plantain (*Plantago coronopus*), and common Mediterranean grass (*Schismus barbatus*). The majority of the project site consists of disturbed/ruderal vegetation.

A total of 18 vascular plant species were identified within the project site during the November 2021 field survey (refer to Attachment C). A total of 10 (55.6 percent) of these plant species represent nonnative taxa, reflecting a high level of disturbance within the project site.

Wetlands and Other Jurisdictional Waters

The United States Army Corps of Engineers (USACE), under Section 404 of the federal Clean Water Act (CWA), regulates discharges of dredged or fill material into “waters of the United States.” These waters include wetlands and nonwetland bodies of water that meet specific criteria, including a connection to interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or it may be indirect (through a connection identified in USACE regulations). The USACE typically regulates as nonwetland waters of the United States any body of water displaying an “ordinary high water mark.” To be considered a “jurisdictional wetland” under Section 404, an area must possess hydrophytic vegetation, hydric soils, and wetland hydrology. The CDFW, under Sections 1600 et seq. of the California Fish and Game Code, regulates alterations to lakes, rivers, and streams. A stream is defined by the presence of a channel bed and banks and at least an occasional flow of water. The Regional Water Quality Control Board (RWQCB) is responsible for the administration of Section 401 of the CWA through water quality certification of any activity that may result in a discharge to jurisdictional waters of the United States. The RWQCB may also regulate discharges to “waters of the State,” including wetlands, under the California Porter-Cologne Water Quality Control Act.

No drainage features, ponded areas, wetlands, or riparian habitat subject to jurisdiction of the CDFW, the USACE, and/or the RWQCB were found within the project area or BSA.

Wildlife

Native wildlife habitat is absent on the project site. Furthermore, the development surrounding the project site and absence of suitable foraging habitat make the site largely undesirable for many native wildlife species. Mr. Rosenthal observed seven native wildlife species predominantly flying over the project site during the November 2021 field survey, including greater roadrunner (*Geococcyx californianus*), common raven (*Corvus corax*), bushtit (*Psaltriparus minimus*), house finch (*Haemorhous mexicanus*), lesser goldfinch (*Spinus psaltria*), California towhee (*Melospiza crissalis*), and common side-blotched lizard (*Uta stansburiana*). One nonnative species, European starling (*Sturnus vulgaris*), was also observed during the field survey. No special-status animal species were observed during the field survey, and suitable habitat for such species is absent from the proposed project disturbance limits. Because the field survey was conducted in November 2021, outside of the nesting bird season, nesting birds and nesting activity were not observed.

The project site occurs within an Essential Connectivity Area, as identified in the California Essential Habitat Connectivity Project.¹ Based on field observations and the location of the project parcel, there are no indications that the site functions as a wildlife movement corridor or an important stopover point for migratory species. The project site is located within a transportation corridor between I-15 and an adjacent, parallel surface street and is adjacent to commercial development. The project site is not directly connected to larger tracts of undeveloped lands that would provide suitable habitat for wildlife movement in the Cajon Pass. Wildlife movement within the Cajon Pass is anticipated to occur to the east and west of I-15 and adjacent developed areas in lands that are undeveloped, especially along drainage features present such as the Cajon Wash.

Special-Status Species

Special-Status Plant Species

Based on review of the current biological database records², there are known occurrence records of 21 special-status plant species in the vicinity of the project site.

One of the 21 special-status plants, short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) was determined to not be present since it is visually conspicuous year-round and was not observed. All of the remaining 20 special-status plant species are not expected to occur within the project site due to the lack of suitable habitat and/or conditions on site. These special-status plant species include Mojave milkweed (*Asclepias nyctaginifolia*), San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius*), upswept moonwort (*Botrychium ascendens*), scalloped moonwort (*Botrychium crenulatum*), Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*), Plummer's mariposa lily (*Calochortus plummerae*), white pygmy-poppy (*Canbya candida*), Peirson's spring beauty (*Claytonia*

¹ Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California*. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

² California Department of Fish and Wildlife. 2021. California Natural Diversity Database. RareFind 5 (Version 5.2.14). Website: <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> (accessed November 2021).

peirsonii ssp. *peirsonii*), white-bracted spineflower (*Chorizanthe xanti* var. *leucotheca*), Los Angeles sunflower (*Helianthus nuttallii* ssp. *parishii*), Parish's alumroot (*Heuchera parishii*), lemon lily (*Lilium parryi*), San Gabriel linanthus (*Linanthus concinnus*), Jokerst's monardella (*Monardella australis* spp. *jokertsii*), California muhly (*Muhlenbergia californica*), woolly mountain-parsley (*Oreonana vestita*), Rock Creek broomrape (*Orobancha valida* spp. *valida*), black bog-rush (*Schoenus nigricans*), San Bernardino aster (*Symphotrichum defoliatum*), and Greata's aster (*Symphotrichum greatae*).

Special-Status Animal Species

Based on review of the current biological database records¹, there are known occurrence records of 15 special-status animal species in the vicinity of the project site.

All 15 special-status animal species are not expected to occur within the project site due to the lack of suitable habitat and/or conditions on site. These special-status animal species include Crotch bumble bee (*Bombus crotchii*), Santa Ana speckled dace (*Rhinichthys osculus* ssp. 8), Mohave tui chub (*Siphateles bicolor mohavensis*), arroyo toad (*Anaxyrus californicus*), San Gabriel Mountains slender salamander (*Batrachoseps gabrieli*), coastal western whiptail (*Aspidoscelis tigris stejnegeri*), coast horned lizard (*Phrynosoma blainvillii*), two-striped garter snake (*Thamnophis hammondi*), Bell's sage sparrow (*Artemisiospiza belli belli*), nesting long-eared owl (*Asio otus*), southwestern willow flycatcher (*Empidonax traillii extimus*), nesting yellow warbler (*Setophagia petechia*), least Bell's vireo (*Vireo bellii pusillus*), lodgepole chipmunk (*Neotamias speciosus speciosus*), and American badger (*Taxidea taxus*).

The project site is mapped within designated or proposed critical habitat for arroyo toad. Critical habitat designations identify, to the extent known using the best scientific and commercial data available, those physical or biological features that are essential to the conservation of the species, focusing on the principal biological or physical constituent elements within an area that are essential to the conservation of the species. Primary constituent elements are the elements of physical or biological features that, when laid out in the appropriate quantity and spatial arrangement to provide for the species' life-history process, are essential to the conservation of the species. Primary constituent elements for the arroyo toad include (1) rivers or streams with hydrologic regimes that supply water to provide space, food, and cover needed to sustain eggs, tadpoles, metamorphosing juveniles, and adult breeding toads; (2) riparian and adjacent upland habitats, particularly low-gradient stream segments and alluvial streamside terraces with sandy or fine gravel substrates that support the formation of shallow pools and sparsely vegetated sand and gravel bars for breeding and rearing of tadpoles and juveniles; (3) a natural flood regime; and (4) stream channels and adjacent upland habitats that allow for the movement to breeding pools, foraging areas, overwintering sites, upstream and downstream dispersal, and connectivity to the areas that contain suitable habitat². The proposed project site does not include the aforementioned primary

¹ California Department of Fish and Wildlife. 2023. California Natural Diversity Database. RareFind 5 (Version 5.3.0). Website: <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data> (accessed April 2023).

² United States Fish and Wildlife Service. 2011. Endangered and Threatened Wildlife and Plants; Revised Critical Habitat for the Arroyo Toad. Federal Register. February 9. Website: <https://www.federalregister.gov/documents/2011/02/09/2011-1703/endangered-and-threatened-wildlife-and-plants-revised-critical-habitat-for-thLee-arroyo-toad> (accessed January 6, 2022).

constituent elements required for the life cycle needs of the arroyo toad; therefore, arroyo toad is not expected to occur within or in the immediate vicinity of the project site. Additionally, while one species occurrence was documented 0.6 mile southwest of the project site, it was recorded in 2007 (CNDDDB) to the west of I-15, within Cajon Wash.

Attachment D contains tables that identify those special-status plant and animal species known to occur or that potentially occur in the vicinity of the project site, and includes each species' conservation status and probability of occurrence within the proposed construction footprint.

Special-Status Natural Communities

No special-status natural communities were identified within the project area.

Soils

According to the Natural Resources Conservation Service (NRCS) online soil survey of San Bernardino County, one soil type has been mapped within the project area¹ and includes Riverwash-Soboba families association, 2 to 15 percent. This soil series are excessively drained soils that formed in alluvial flats from parent material consisting of alluvium. This soil complex occurs within the entirety of the project area (Figure 3, Soils).

Local Policies and Ordinances Protecting Biological Resources

City and county general plans and development ordinances may include regulations or policies governing biological resources. For example, policies may require tree preservation, or designate local species survey areas, species of interest, or significant ecological areas.

Under the San Bernardino County Plant Protection Ordinance, oak tree removal requires a tree removal permit. Additionally, the Plant Protection Ordinance prohibits removal of vegetation within 200 feet of a stream without a tree permit and environmental review with mitigations imposed. No oak trees or streams were identified within the project site.

IMPACT FINDINGS

Vegetation and Habitat Impacts

The project would not result in any direct impacts to native habitats or sensitive natural communities. Less than significant impacts would occur to native plant species with project implementation. Additionally, permanent direct impacts to nonnative and invasive vegetation would occur with project implementation.

Special-Status Plant Species

No special-status plant species were observed during the site survey. While the field survey took place in early fall (November), outside of the flowering season for the majority of plant species listed in Attachment D: Summary of Special-Status Species, none of the special status plant species are

¹ Natural Resource Conservation Service. 2021. Web Soil Survey. Website: <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx> (accessed November 2021).

expected to occur on the project site due to historical grading operations, the high degree of on-site anthropogenic disturbance, and interspecific competitive exclusion from nonnative species. Therefore, focused special-status plant surveys during the appropriate blooming periods for these species are not recommended.

Special-Status Animal Species

No special-status animal species were observed during the site survey, and suitable habitat for such species is absent from the proposed project disturbance limits. In addition, the project site does not function as a wildlife movement corridor.

Nesting Birds

Because the project site contains suitable habitat (disturbed/ruderal vegetation and pine trees) for nesting bird species, potential direct and/or indirect impacts (e.g., clearing and grubbing of vegetation and noise during construction) could potentially disrupt or otherwise adversely affect bird nesting activities in and/or adjacent to the project impact area. Nesting birds are protected by California Fish and Game Code Sections 3503, 3503.5, and 3800, and by the Migratory Bird Treaty Act (16 United States Code 703–711). These laws regulate the take, possession, or destruction of the nest or eggs of any migratory bird or bird of prey.

To avoid potential effects to nesting birds, implementation of the following measure is recommended.

Bio-Measure #1: Preconstruction Nesting Bird Surveys and Active Nest Avoidance Buffers

If vegetation removal, construction, or grading activities are planned to take place within the active nesting bird season (February 15 through August 31), a qualified biologist should conduct a preconstruction nesting bird survey no more than 3 days prior to the start of such activities. The nesting bird survey should include the project site and areas immediately adjacent to the site that could potentially be affected by project-related activities such as noise, vibration, increased human activity, and dust. If any active bird nests are found within areas that could be directly or indirectly impacted by project-related activities, the qualified biologist should establish an appropriate buffer zone around each active nest. The appropriate buffer should be determined by the qualified biologist based on species, location, and the nature of the proposed activities. Project activities should be avoided within the buffer zone until each nest is deemed no longer active by a qualified biologist.

Critical Habitat for Arroyo Toad

The project site is mapped within designated or proposed critical habitat for arroyo toad. The proposed project site does not include the primary constituent elements required for the life cycle needs of the arroyo toad; therefore, arroyo toad is not expected to occur within or in the immediate vicinity of the project site. Concurrence that the project site does not include the primary constituent elements required for the life cycle of arroyo toad was provided by John M. Taylor with the United States Fish and Wildlife Service on January 19, 2023 (Attachment E).

Wildlife Movement


Wildlife species that occur in the project vicinity are adapted to the urban-wildland interface. The noise, vibration, light, dust, or human disturbance within construction areas would only temporarily deter wildlife from using areas in the immediate vicinity of construction activities. These indirect effects could temporarily alter migration behaviors, territories, or foraging habitats in select areas. However, because these are temporary effects, it is likely that wildlife already living and moving close to urban development would alter their normal functions for the duration of project construction and then reestablish these functions once all temporary construction effects have been removed. As the project site is surrounded by existing commercial development and paved roadways, including the 10 lanes of I-15, and is not directly connected to larger tracts of undeveloped lands, the proposed project's activities would not place any permanent barriers within areas that provide suitability for wildlife movement despite the project site being located within an Essential Connectivity Area by the California Essential Habitat Connectivity Project. The nearest wildlife movement area is located within Cajon Wash, located approximately 0.06 mile southwest of the project site, and a large culvert at Crowder Canyon, which crosses under I-15 approximately 0.25 mile southeast of the project site. Neither of these two wildlife movement areas will be impacted or obstructed by project activities. The impact is considered less than significant, and no mitigation is warranted.

Consistency with Adopted Habitat Conservation Plan/Natural Community Conservation Plan and Local Policies

The project site is not within sensitive conservation areas identified by State, regional, or local plans. Protected trees are absent from the project site. Thus, project implementation would not conflict with any regional conservation plan or local policies related to biological resources.

Sincerely,

LSA Associates, Inc.

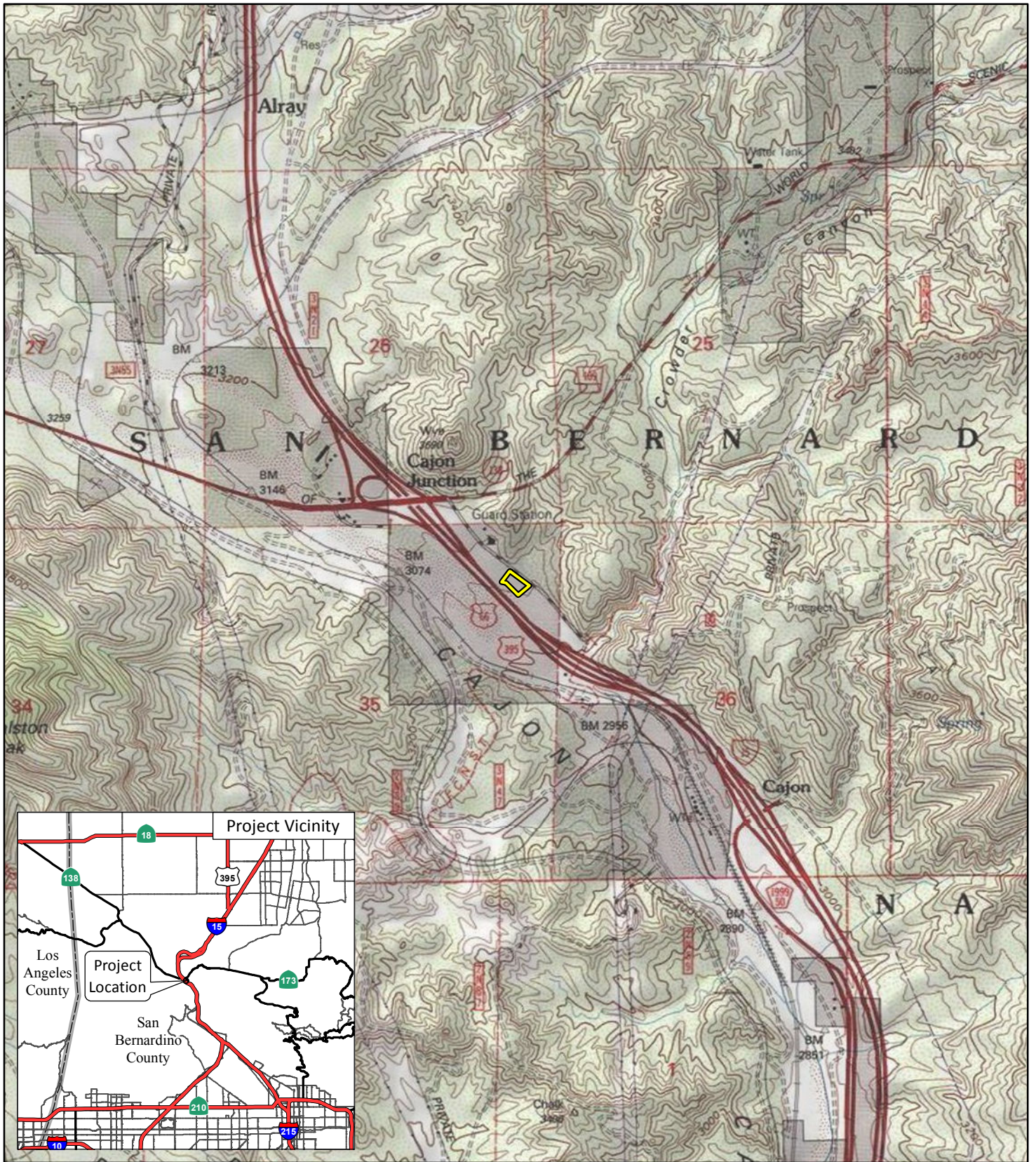


Jeremy Rosenthal
Biologist

Attachments: A – Figures 1 through 3
B – Representative Site Photos
C – Plant and Animal Species Observed
D – Summary of Special-Status Species
E – USFWS Arroyo Toad Critical Habitat Concurrence Correspondence

ATTACHMENT A

FIGURES 1–3



LSA

LEGEND

 Project Location



0 1000 2000
FEET

SOURCE: USGS 7.5' Quad - Cajon (1988), CA

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FIGURE 1

Cajon Pass Commercial Retail Project
Regional and Project Location

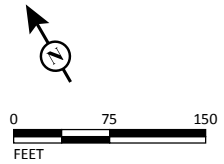


FIGURE 2

LSA

LEGEND

- Project Location (Cajon Commercial)
- Disturbed Riversidian Sage Scrub
- Disturbed/Ruderal
- Ornamental Landscaping
- Critical Habitat
- Arroyo Toad (*Anaxyrus californicus*)



SOURCE: Google Imagery (2020), USFWS (2020)
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Cajon Pass Commercial Retail Project
Vegetation and Critical Habitat



FIGURE 3


LSA

LEGEND

 Project Location (Cajon Commercial)

Soils

 Riverwash-Soboba families association, 2 to 15 percent slopes (EsD)

 Trigo family-Lithic Xerorthents, warm complex, 50 to 75 percent slopes (DnG)



SOURCE: Google Imagery (2020), NRCS (2021)

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ATTACHMENT B

REPRESENTATIVE SITE PHOTOS



Photo 1: View looking southeast from the northern portion of the project site.



Photo 2: View looking northwest from the eastern portion of the project site.



Photo 3: View looking north from the southern portion of the project site.



Photo 4: View looking northeast from the western portion of the project site.

ATTACHMENT C

PLANT AND ANIMAL SPECIES OBSERVED

PLANT SPECIES OBSERVED

CONIFERS

Pinaceae

Pinus sp.

Pine family

pinos

EUDICOT FLOWERING PLANTS

Asteraceae

Baccharis salicifolia ssp. *salicifolia*

Corethrogyne filaginifolia var. *californica*

Ericameria nauseosa

**Gazania linearis*

Sunflower family

mule fat

California aster

common rabbitbrush

gazania

Boraginaceae

Eriodictyon angustifolium

Borage family

yerba santa

Brassicaceae

**Brassica rapa*

Mustard family

field mustard

Chenopodiaceae

**Atriplex semibaccata*

**Salsola tragus*

Saltbush family

Australian saltbush

Russian-thistle

Fabaceae

Acmispon glaber

Pea family

deerweed

Geraniaceae

**Erodium cicutarium*

Geranium family

redstem filaree

Plantaginaceae

**Plantago coronopus*

Plantain family

buckhorn plantain

Polygonaceae

Eriogonum fasciculatum

Eriogonum gracile var. *gracile*

Buckwheat family

California buckwheat

slender woolly wild buckwheat

Tamaricaceae

**Tamarix ramosissima*

Tamarisk family

saltcedar

MONOCOTS FLOWERING PLANTS

Poaceae

- **Bromus diandrus*
- **Cynodon dactylon*
- **Schismus barbatus*

Grass family

- ripgut brome
- Bermuda grass
- Mediterranean grass

Taxonomy and scientific nomenclature generally conform to Baldwin, B.G., D.H. Goldman et al., eds. (2012; The Jepson Manual: Vascular Plants of California, 2nd edition; University of California Press, Berkeley and Los Angeles, California).

Common names for each taxa generally conform to the Natural Resources Conservation Service PLANTS database (<https://plants.usda.gov>).

* Species not native to the study area

ANIMAL SPECIES OBSERVED

BIRDS

Cuculidae

Geococcyx californianus

Cuckoos and Roadrunners

greater roadrunner

Corvidae

Corvus corax

Crows and Ravens

common raven

Aegithalidae

Psaltriparus minimus

Bushtits

bushtit

Sturnidae

**Sturnus vulgaris*

Starlings

European starling

Fringillidae

Haemorhous mexicanus

Spinus psaltria

Finches

house finch

lesser goldfinch

Passerellidae

Melospiza crissalis

New World Sparrows

California towhee

REPTILES

Phrynosomatidae

Uta stansburiana

Phrynosomatid Lizards

common side-blotched lizard

* Species not native to the study area

ATTACHMENT D

SUMMARY OF SPECIAL-STATUS SPECIES

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
Plants			
<i>Asclepias nyctaginifolia</i> Mojave milkweed	US: – CA: 2B.1	Perennial herb. Mojavean desert scrub and pinon and juniper woodlands from 775 to 1,605 meters (2,542 to 5,265 feet) in elevation. Typically blooms from May through June.	Not Expected. Mojavean desert scrub and pinon and juniper woodlands were not observed during the November 2021 field survey. Additionally, the project site consists of a graded pad with compacted soils.
<i>Astragalus lentiginosus</i> var. <i>antonius</i> San Antonio milk-vetch	US: – CA: 1B.3	Perennial herb. Yellow pine forest at 1,500 to 2,600 meters (5,000 to 8,500 feet) in elevation. Occurs only in Los Angeles and San Bernardino counties. Typically blooms from April through July.	Not Expected. Yellow pine habitat forest does not occur within the project site. The project site is outside of the elevation range for this species.
<i>Botrychium ascendens</i> upswept moonwort	US: – CA: 2B.3	Rhizomatous fern. Grassy fields and coniferous woods near springs and creeks. Generally in lower montane coniferous forest, and meadows and seeps at 1,115 to 3,265 meters (3,658 to 10,710 feet) in elevation. Typically blooms from June through August.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Botrychium crenulatum</i> Scalloped moonwort	US: – CA: 2B.2	Rhizomatous fern. Bogs, moist meadows and seeps, marshes, and swamps of lower montane coniferous forest; 1,500 to 3,280 meters (4,900 to 10,800 feet). Scattered but not common anywhere in California. Typically blooms from June through September.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Calochortus palmeri</i> var. <i>palmeri</i> Palmer's mariposa-lily	US: – CA: 1B.2	Perennial herb. Mesic sites in chaparral and lower montane coniferous forest at 600 to 2,400 meters (2,000 to 7,900 feet) in elevation. Known from Riverside, San Bernardino, Santa Barbara, Los Angeles, Ventura, Kern, and San Luis Obispo counties. Typically blooms from April through July.	Not Expected. Chaparral and lower montane coniferous forest were not observed during the November 2021 field survey. Additionally, the site is an artificially constructed pad and lacks the soil moisture content otherwise found in mesic sites.
<i>Calochortus plummerae</i> Plummer's mariposa-lily	US: – CA: 4.2	Perennial herb. Rocky sites of granitic or alluvial material in valley and foothill grassland, coastal scrub, chaparral, cismontane woodland, and lower montane coniferous forest, at 100 to 1,700 meters (300 to 5,600 feet) in elevation. Known from Riverside, San Bernardino, Orange, Los Angeles, and Ventura counties, California. In the western Riverside County area, this species is known from the foothills of the San Bernardino Mountains, northeastern Santa Ana Mountains, Box Springs Mountains, and from the Lake Skinner area (<i>The Vascular Plants of Western Riverside County, California</i> . F.M.	Not Expected. Disturbed Riversidian sage scrub habitat occurs within the project site but is not considered suitable due to historical and ongoing disturbance. This species was identified 0.28 mile to the west of the project site in 2005 (CNDDDB).

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
		Roberts et al., 2004). Appears to intergrade with <i>Calochortus weedii</i> var. <i>intermedius</i> , which is mostly from Santa Ana Mountains eastward. Typically blooms from May through July.	
<i>Canbya candida</i> White pygmy-poppy	US: – CA: 4.2	Annual herb. Sandy and gravelly places in Joshua tree woodland, pinyon and juniper woodland, and Mojave Desert scrub from 600 to 1,460 meters (2,000 to 4,800 feet) in elevation. Known only from Kern, Los Angeles, Inyo, Imperial, and San Bernardino counties. Typically blooms from March through June.	Not Expected. Joshua tree woodland, pinyon and juniper woodland, and Mojave Desert scrub were not observed during the November 2021 field survey. High levels of disturbance and historical grading operations have precluded these habitat types from developing within the project site.
<i>Chorizanthe xanti</i> var. <i>leucotheca</i> White-bracted spineflower	US: – CA: 1B.2	Annual herb. Sandy to gravelly places in Mojave Desert scrub, pinyon and juniper woodland, or coastal scrub in the Transverse and Peninsular ranges and desert edge foothills at 300 to 1,200 meters (980 to 3,900 feet) in elevation in coastal Southern California and adjacent desert areas. Known only from Los Angeles, Riverside, San Bernardino, and San Diego counties, California. Typically blooms from April through June.	Not Expected. Disturbed Riversidian sage scrub habitat occurs within the project site but is not considered suitable due to historical on-site grading operations and ongoing anthropogenic disturbances. Additionally, the latest known occurrence of this species was identified 1.8 miles southeast of the project site in 2008 (CNDDDB).
<i>Claytonia peirsonii</i> ssp. <i>peirsonii</i> Peirson’s spring beauty	US: – CA: 1B.2	Perennial herb. This subspecies known only from San Bernardino County in subalpine and upper montane coniferous forest of the San Gabriel Mountains; gravelly soils or scree; elevations 2,135 to 2,750 meters (7,000 to 9,000 feet). Typically blooms from February through May.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Helianthus nuttallii</i> ssp. <i>parishii</i> Los Angeles sunflower	US: – CA: 1A	Perennial herb. Marshes and swamps (coastal salt and freshwater) at 10 to 500 meters (30 to 1,600 feet) in elevation. This species is historically known from Los Angeles, Orange and San Bernardino counties, California. Last seen in 1937. Presumed extinct. Plants found in 2002 at Castaic Spring along the Santa Clara River in Los Angeles County were initially reported as possibly this taxon, but instead appear to be hybrids or evolutionary intermediates between <i>H. nuttallii</i> and <i>H. californicus</i> , based on chromosome counts and pollen morphology (<i>A Quantitative Analysis of Pollen Variation in Two Southern California Perennial Helianthus (Heliantheae: Asteraceae)</i> , J.M. Porter and N. Fraga, 2004). Typically blooms from August through October.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
<i>Heuchera parishii</i> Parish's alumroot	US: – CA: 1B.3	Perennial herb. Rocky areas in coniferous forests in Riverside and San Bernardino counties at 1,500 to 3,800 meters (4,900 to 12,500 feet) in elevation. Typically blooms from June through August.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Lilium parryi</i> Lemon lily	US: – CA: 1B.2	Perennial herb. Bulbiferous perennial herb of wet areas in meadows and riparian and montane coniferous forests at 1,220 to 2,790 meters (4,000 to 9,200 feet) elevation. In California, known from Los Angeles, Riverside, San Bernardino, and San Diego counties. Also occurs in Arizona and Mexico. Typically blooms from July through August.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Linanthus concinnus</i> San Gabriel linanthus	US: – CA: 1B.2 BLM: –	Annual herb. Dry rocky slopes in lower and upper montane coniferous forest at 1,520 to 2,800 meters (5,000 to 9,200 feet) elevation; known only from Los Angeles and San Bernardino counties. Typically blooms from April through July.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Monardella australis</i> ssp. <i>jokerstii</i> Jokerst's monardella	US: – CA: 1B.1	Perennial herb. Steep scree or talus slopes between breccia and secondary alluvial benches along drainages and washes, in lower montane coniferous forest and chaparral at 1,350 to 1,750 meters (4,430 to 5,740 feet). Known only from the San Gabriel Mountains of San Bernardino County, California. Typically blooms from July through September.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Muhlenbergia californica</i> California muhly	US: – CA: 4.3	Perennial grass-like herb. Stream banks, canyons, and other moist sites in chaparral, coastal sage scrub, coniferous forest, and meadows at 100 to 2,000 meters (300 to 6,600 feet) in elevation. Known only from the San Gabriel, San Bernardino, and San Jacinto mountains of Los Angeles, San Bernardino, and Riverside counties, California. Typically blooms from June through September.	Not Expected. Chaparral, coastal sage scrub, coniferous forests, and meadows were not observed during the November 2021 field survey. Additionally, due to historical on-site grading operations, mesic conditions are precluded from the project site. Finally, there are no known occurrences within 3 miles of the project site.

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
<i>Opuntia basilaris</i> var. <i>brachyclada</i> Short-joint beavertail	US: – CA: 1B.2	Shrub. Sandy soil or coarse, granitic loam in chaparral, Joshua tree woodland, Mojavean Desert scrub, and pinyon-juniper woodland at 425 to 1,800 meters (1,400 to 5,900 feet) in elevation in the Providence Mountains and desert slopes of the San Gabriel and San Bernardino mountains. Known only from Los Angeles and San Bernardino counties, California. Individuals of <i>Opuntia basilaris</i> in the Santa Clarita area, which are occasionally identified as variety <i>brachyclada</i> , are more properly considered variety <i>basilaris</i> , a common variety of this species (Andrew Sanders, Herbarium Curator at University of California, Riverside, pers. comm. to Stanley Spencer, August 29, 2007; Steve Boyd, Herbarium Curator at Rancho Santa Ana Botanic Garden, pers. comm. to Stanley Spencer, August 29, 2007). Typically blooms from April through June.	Absent. Although not observed during the field survey, species occurrences have been documented 0.27 mile northwest of the project site (CNDDDB).
<i>Oreonana vestita</i> Woolly mountain-parsley	US: – CA: 1B.3	Perennial herb. Scree, talus, or gravel on high ridges in subalpine coniferous forest and upper montane coniferous forest at 1,615 to 3,500 meters (5,300 to 11,500 feet) elevation. Known only from Kern, Los Angeles, and San Bernardino Counties, California. Typically blooms from May through September.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Orobanche valida</i> spp. <i>valida</i> Rock Creek broomrape	US: – CA: 1B.2	Perennial herb. Parasitic on various chaparral shrubs. Found in granitic soils of chaparral, pinyon-juniper woodland at 1,250 to 2,000 meters (4,100 to 6,600 feet) in elevation. Known only from Inyo, Los Angeles, San Bernardino and Ventura counties, California. Typically blooms from May through September.	Not Expected. Suitable habitat is not present within the project site. The project site is outside of the elevation range for this species.
<i>Schoenus nigricans</i> Black bog-rush	US: – CA: 2B.2	Perennial grass-like herb. Marshes and swamps (often in alkali soils) in elevations from 140 to 2,130 meters (500 feet to 7,000 feet). Known from Inyo and San Bernardino counties, California, and Nevada, Texas, and elsewhere. Typically blooms from August through September.	Not Expected. Marshes and swamps were not observed during the November 2021 field survey and are precluded from the project site due to historical on-site grading operations. Additionally, the site is historically upland in nature.

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
<i>Symphotrichum defoliatum</i> San Bernardino aster	US: – CA: 1B.2	Perennial herb. Vernal wet sites (such as ditches, streams, and springs) in many plant communities below 2,040 meters (6,700 feet) in elevation. In California, known from Ventura, Kern, San Bernardino, Los Angeles, Orange, Riverside, and San Diego counties. May also occur in San Luis Obispo County. In the western Riverside County area, this species is scarce and documented only from Temescal and San Timoteo canyons (<i>The Vascular Plants of Western Riverside County, California</i> . F.M. Roberts et al., 2004). Typically blooms from July through November.	Not Expected. Ditches, streams, and springs were not observed within the project site during the November 2021 field survey. Additionally, due to historical on-site grading operations, the aforementioned habitat types are precluded from the project site.
<i>Symphotrichum (Aster) greatae</i> Greata's aster	US: – CA: 1B.3	Perennial herb. Mesic places in canyons in chaparral and woodland habitats at 300 to 2,010 meters (1,000 to 6,600 feet) in elevation. Known only from Los Angeles, San Bernardino, and Ventura counties. Typically blooms from June through October.	Not Expected. Canyons in chaparral and woodland habitats were not observed on the project site during the November 2021 field survey. Additionally, due to historical on-site grading operations, mesic conditions are precluded from the project site.
Invertebrates			
<i>Bombus crotchii</i> Crotch bumble bee	US: – CA: SA	Nectars on Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, and Eriogonum in coastal California east to the Sierra-Cascade crest and south into Mexico.	Not Expected. Suitable habitat is not present within the project site. Two suitable foraging species, limited to two species of genus <i>Eriogonum</i> , were identified within the project site. Additionally, documented occurrences are known within 0.27 mile of the project site.
<i>Rhinichthys osculus</i> ssp. 8 Santa Ana speckled dace	US: – CA: SSC	Found in the headwaters of the Santa Ana and San Gabriel River drainages. Found in riffles in small streams and shore areas with abundant gravel and rock.	Not Expected. There are no aquatic resources within the project site to support this species. Historical grading operations further preclude these habitat types.
<i>Siphateles bicolor mohavensis</i> Mohave tui chub	US: FE CA: SE	Adapted to alkaline and mineralized waters. Requires deep pools, ponds, or sough-like areas. Endemic to the Mojave River basin.	Not Expected. There are no aquatic resources within the project site to support this species. Historical grading operations further preclude these habitat types.

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
Amphibians			
<i>Anaxyrus (Bufo) californicus</i> Arroyo toad	US: FE CA: SSC	Washes and arroyos with open water; sand or gravel beds; for breeding, pools with sparse overstory vegetation. Coastal and a few desert streams from Santa Barbara County to Baja California.	Not Expected. The project site is mapped within arroyo toad critical habitat; however, primary constituent elements required for the life cycle needs of the arroyo toad are not present within the project site.
<i>Batrachoseps gabrieli</i> San Gabriel Mountains slender salamander	US: – CA: SA	Found under rocks, wood, fern fronds and on soil at the base of talus slopes. This salamander is most active on the surface in winter and early spring. Known only from the San Gabriel Mountains.	Not Expected. The project site is devoid of rocks, wood, and fern fronds, and talus slopes were not observed in the vicinity of the project site during the November 2021 field survey.
Reptiles			
<i>Aspidoscelis tigris stejnegeri</i> Coastal western whiptail	US: – CA: SSC	Woodlands, riparian areas, and sparsely vegetated areas in a wide variety of habitats including coastal sage scrub and sparse grassland. Occurs in valleys and foothills from Ventura County to Baja California.	Not Expected. Suitable habitat is not present within the project site. Known occurrences have been documented 2.3 miles south in 2013 (CNDDDB).
<i>Phrynosoma blainvillii (coronatum)</i> Coast horned lizard	US: – CA: SSC	Primarily in sandy soil in open areas, especially washes and floodplains, in many plant communities. Requires open areas for sunning, bushes for cover, patches of loose soil for burial, and an abundant supply of ants or other insects. Occurs west of the deserts from northern Baja California north to Shasta County below 2,400 meters (8,000 feet) in elevation.	Not Expected. Suitable habitat is not present within the project site. Numerous occurrences documented within 3 miles of the project site have been recorded no later than 2004 (CNDDDB).
<i>Thamnophis hammondi</i> Two-striped garter snake	US: – CA: SSC	Highly aquatic. Only in or near permanent sources of water. Streams with rocky beds supporting willows or other riparian vegetation. From Monterey County to northwestern Baja California.	Not Expected. There are no aquatic resources within the project site to support this species. Historical grading operations further preclude these habitat types. .
Birds			
<i>Artemisospiza (Amphispiza) belli</i> Bell's sage sparrow	US: – CA: SA	Occupies chaparral and coastal sage scrub from west central California to northwestern Baja California.	Not Expected. Although California buckwheat is present in minimal quantities within the project site, it consists of 0.04 ac of land cover and is bounded to the northeast by Wagon Train Road and by disturbed/ruderal vegetation within the project site. A known occurrence is documented 2.25 miles south of the project site in 2015 (CNDDB 2023).

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Species	Status	Habitat and Distribution	Sample Occurrence Probability
<i>Asio otus</i> (nesting) Long-eared owl	US: – CA: SSC (breeding)	Scarce and local in forests and woodlands throughout much of the Northern Hemisphere. Rare resident in coastal Southern California. Nests and roosts in dense willow-riparian woodland and oak woodland, but forages over wider areas. Breeds from valley foothill hardwood up to ponderosa pine habitat.	Not Expected. Forest and woodland habitat types were not observed in the project site during the November 2021 field survey. Additionally, based on a review of the CNDDDB, this species has not been documented within 3 miles of the project site.
<i>Empidonax traillii extimus</i> Southwestern willow flycatcher	US: FE CA: SE	Rare and local breeder in extensive riparian areas of dense willows or (rarely) tamarisk, usually with standing water, in the southwestern U.S. and possibly extreme northwestern Mexico. Winters in Central and South America. Below 6,000 feet elevation.	Not Expected. There are no riparian areas within the project site to support this species. Historical grading operations further preclude these habitat types.
<i>Setophagia petechia</i> (nesting) Yellow warbler	US: – CA: SSC (breeding)	Riparian woodland while nesting in the western U.S. and northwestern Baja California; more widespread in brushy areas and woodlands during migration. Occurs from western Mexico to northern South America in winter. Migrants are widespread and common. Three subspecies breed in California: <i>morcomi</i> , <i>brewsteri</i> , and <i>sonorana</i> . (Sonoran yellow warbler nests along the Colorado River.)	Not Expected. There are no riparian areas within the project site to support this species. Historical grading operations further preclude these habitat types.
<i>Vireo bellii pusillus</i> Least Bell's vireo	US: FE CA: SE	Riparian forests and willow thickets. The most critical structural component of least Bell's vireo habitat in California is a dense shrub layer 2 to 10 feet (0.6–3.0 meters) above ground. Willows are usually dominant. Nests from central California to northern Baja California. Winters in southern Baja California.	Not Expected. Riparian forests and willow thicket habitat types were not observed in the project site during the November 2021 field survey. Additionally, historical grading operations further preclude suitable habitat for this species.
Mammals			
<i>Neotamias speciosus</i> Lodgepole Chipmunk	US: – CA: SA	Occurs in open-canopy forests of mixed conifer, Jeffrey pine, lodgepole and limber pine, chinquapin, and occasionally in chaparral (manzanita and whitethorn). Generally found in areas of mixed trees, shrubs, large boulders, and open ground above 1,950 meters (6,400 feet) in elevation. Lodgepole chipmunks are more arboreal than most other species of chipmunks, using trees for refuge, observation posts, and nests. Known from the summits of the Piute, San Bernardino, San Gabriel, San Bernardino, and San Jacinto mountains in Kern, Los Angeles, San Bernardino, and Riverside counties. Apparently extirpated from the San Jacinto Mountains.	Not Expected. Open-canopy forests of mixed conifer, Jeffrey pine, lodgepole and limber pine, chinquapin, and chaparral habitats were not observed in the project site during the November 2021 field survey. Additionally, based on a review of the CNDDDB, this species has not been documented within 3 miles of the project site.

Table D: CNDDDB Special Status Species Identified as Potentially Occurring or Known to Occur in the Project Vicinity

Species	Status	Habitat and Distribution	Sample Occurrence Probability
<i>Taxidea taxus</i> American badger	US: – CA: SSC	Primary habitat requirements seem to be sufficient food and friable soils in relatively open uncultivated ground in grasslands, woodlands, and desert. Widely distributed in North America.	Not Expected. Burrows were not observed in the project site during the November 2021 field survey. Additionally, grassland and woodland habitat types are not present. Further, based on a review of the CNDDDB, occurrences have not been documented within 3 miles of the project site.

US: Federal Classifications

FE = Listed as endangered.

CA: State Classifications

SA = Special Animal. Refers to any other animal monitored by the Natural Diversity Data Base, regardless of its legal or rarity status.

SSC = Species of Special Concern. Refers to animals with vulnerable or seriously declining populations.

CNPS Designations:

1A = Plants presumed extinct in California and rare/extinct elsewhere

1B.1 = Rare threatened, or endangered in California and elsewhere

1B.2 = Plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California

1B.3 = Plants rare, threatened, or endangered in California and elsewhere; not very threatened in California

2B.1 = Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California

2B.2 = Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California

2B.3 = Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California

2B = Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California

4.2 = Plants of limited distribution; fairly threatened in California

4.3 = Plants of limited distribution; not very threatened in California

CA = California

U.S. = United States

ATTACHMENT E

USFWS ARROYO TOAD CRITICAL HABITAT CONCURRENCE CORRESPONDENCE

From: [Taylor, John](#)
To: [Dionisios Glentis](#); [Jeremy Rosenthal](#); [Sherwin, William J](#)
Cc: [Ryan Villanueva](#); [Theresa Wallace](#); [Ambarish Mukherjee](#)
Subject: Re: [EXTERNAL] Point of Contact regarding ARTO Critical Habitat (Cajon Pass)
Date: Thursday, January 19, 2023 1:08:25 PM
Attachments: [image001.png](#)

Dionisios,

My many apologies for misplacing your original email, and thank you for following up. In the future, if you don't hear back from our staff within a two or three business days, please reach out again. Based upon email correspondence between yourself and Will Sherwin, analysis of existing arroyo toad occurrences and designated critical habitat, and the project location, this specific site does not support arroyo toad and does not contain any of the physical or biological features necessary to support the species. In addition, although California Department of Transportation facilities are situated nearby, I do not see any federal nexus associated with this project.

If you still wish to have a call to discuss this matter, please reach out to Will Sherwin and myself.

Sincerely,

John M. Taylor
U.S. Fish and Wildlife Service - Palm Springs
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, CA 92262
760-322-2070 x418
john_m_taylor@fws.gov
<https://www.fws.gov/office/carlsbad-fish-and-wildlife>

From: Dionisios Glentis <Dionisios.Glentis@lsa.net>
Sent: Wednesday, January 18, 2023 10:35 PM
To: Jeremy Rosenthal <Jeremy.Rosenthal@LSA.net>; Sherwin, William J <william_sherwin@fws.gov>; Taylor, John <john_m_taylor@fws.gov>
Cc: Ryan Villanueva <Ryan.Villanueva@lsa.net>; Theresa Wallace <Theresa.Wallace@lsa.net>; Ambarish Mukherjee <Ambarish.Mukherjee@lsa.net>
Subject: RE: [EXTERNAL] Point of Contact regarding ARTO Critical Habitat (Cajon Pass)

Good morning John and William,

I am following up on my email below. Please let me know if we can set up a call to discuss the process to ensure compliance with applicable biological regulations.

Attached is the project site plan and location.

Thanks!

Dionisios Glentis | Senior Environmental Planner
LSA | 1500 Iowa Avenue, Suite 200
Riverside, CA 92507

951-781-9310 Office
951-777-2338 Direct
[Website](#)



From: Dionisios Glentis
Sent: Tuesday, November 22, 2022 2:27 PM
To: Jeremy Rosenthal <Jeremy.Rosenthal@LSA.net>; Sherwin, William J <william_sherwin@fws.gov>; Taylor, John <john_m_taylor@fws.gov>
Cc: Ryan Villanueva <Ryan.Villanueva@lsa.net>; Theresa Wallace <Theresa.Wallace@lsa.net>; Ambarish Mukherjee <Ambarish.Mukherjee@lsa.net>
Subject: RE: [EXTERNAL] Point of Contact regarding ARTO Critical Habitat (Cajon Pass)

Good afternoon John and William,

I am the Project Manager for CEQA compliance for this project. As you are aware per the email chain below, our in-house biology staff conducted field survey of the project site and concluded the project will not adversely modify ARTO critical habitat based on a determination that there are no primary constituent elements that will be affected.

For this project, the lead agency under CEQA is the County of San Bernardino. There is no federal funding, and the project is not on federal lands.

Caltrans serves as a Responsible Agency under CEQA with discretionary approval over the project in regards to how the project affects state highway facilities, in this case State Route 138 and Interstate 15. LSA transportation staff are currently working with Jacob Mathew (Caltrans District 8 planner) in this regard.

With this information, I am happy to set up a Teams call and discuss next steps to ensure compliance with all applicable regulations.

Thanks!

Dionisios Glentis | Senior Environmental Planner
LSA | 1500 Iowa Avenue, Suite 200
Riverside, CA 92507