National Trails Highway at 10 Bridges Project

SAN BERNARDINO COUNTY, CALIFORNIA
DISTRICT 8 – SBD – 66/NTH
BRLS-5954(142, 147,149-156)

Findings of Fact and Statement of Overriding Considerations Regarding the Final Environmental Impact Report (SCH 2021040231)

Prepared by the

State of California, Department of Transportation (Caltrans)

and San Bernardino County, Public Works Department

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this Project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated May 27, 2022, and executed by FHWA and Caltrans.

March 2024

FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE NATIONAL TRAILS HIGHWAY AT 10 BRIDGES REPLACEMENT PROJECT

SCH No. 2021040231

March 2024

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I. INTRODUCTION

A. Findings of Fact and Statement of Overriding Considerations

This statement of Findings of Fact addresses the environmental effects associated with the proposed National Trails Highway at 10 Bridges Project (Project), as described in the Environmental Impact Report (EIR). These Findings of Fact are made pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.), specifically California Public Resources Code, Sections 21081, 21081.5, and 21081.6, and the CEQA Guidelines (14 CCR 15000 et seq.), specifically Sections 15091 and 15093. The EIR examines the full range of potential effects of construction and operation of the Project and identifies standard mitigation practices that could be employed to reduce, minimize, or avoid those potential effects.

Once significant impacts have been identified, CEQA and the CEQA Guidelines require that certain findings be made before project approval. It is the exclusive discretion of the decision maker certifying the EIR to determine the adequacy of the proposed candidate findings. Specifically, regarding findings, Guidelines Section 15091 provides:

(a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the Project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

2. Such changes or alternatives are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency and can or should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

(b) The findings required by subdivision (a) shall be supported by substantial evidence in the record.

(c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the Project or made a condition of approval to avoid or substantially lessen significant

environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of proceedings which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

These requirements also exist in Section 21081 of the CEQA statute. The "changes or alterations" referred to in Section 15091(a)(1) above, that are required in, or incorporated into, the Project which avoid or substantially lessen the significant effects of the Project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

Should significant and unavoidable impacts remain after changes or alterations are applied to the Project, a Statement of Overriding Considerations must be prepared. The Statement of Overriding Considerations provides the lead agency's views on whether the benefits of a project outweigh its unavoidable adverse environmental impacts. Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the Project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

(c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the Project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

Having received, reviewed, and considered the Final Environmental Impact Report for the National Trails at 10 Bridges Project State Clearinghouse No. 2021040231 (FIER), as well as all other information in the record of proceedings on this matter, the following Findings of Fact (Findings) are made and Statement of Overriding Considerations (Statement) is adopted by the San Bernardino County (County) in its capacity as the CEQA Lead Agency. These Findings of Fact and Statement of Overriding Considerations set forth the environmental basis for current and subsequent discretionary actions to be undertaken by the County and responsible agencies for the implementation of this project.

B. Record of Proceedings

For the purposes of CEQA, these Findings, and Statement, the Record of Proceedings for the proposed Project consists of the following documents and other evidence, at a minimum, but not limited to:

- The Notice of Preparation (NOP) and all other public notices issued by the County in conjunction with the proposed Project;
- All responses to the NOP received by the County;
- The FEIR;
- The Draft EIR (DEIR);
- All written comments submitted by agencies or members of the public during the public review comment period of the DEIR;
- All responses to the written comments included in the FEIR;
- The Mitigation Monitoring and Reporting Plan (MMRP);
- The reports and technical memoranda included or referenced in any responses to comments in the FEIR;
- All documents, studies, EIRs, or other materials incorporated by reference in, or otherwise relied upon during the preparation of, the DEIR and the FEIR;
- Matters of common knowledge to the County, including but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these Findings and Statement; and
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6€.

C. Custodian and Location of Records

The documents and other materials which constitute the administrative record for the County's actions related to the Project are located at the 825 East Third Street, Room 123, San Bernardino, CA 92415. The County is the custodian of the administrative record for the Project. Copies of these documents, which constitute the Record or Proceedings, are and at all relevant times have been and will be available upon request at the offices of the County noted at the address above. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

II. PROJECT SUMMARY

A. Project Location

The Project is located in the unincorporated communities of Amboy and Essex in San Bernardino County. National Trails Highway, also known as U.S. Route 66, is a two-lane east-west roadway that originates from East Main Street east of the City of Barstow and continues east until it terminates at the Mountain Springs Road/I-50 entrance near the California/Arizona state line. This reach of National Trails Highway includes 128 timber bridges, 10 of which are proposed to be replaced by the proposed Project. The 10 bridge locations are discontinuous and located mostly between Amboy Road and Kelbaker Road near the community of Amboy in San Bernardino County (**see FEIR Figure 1. Project Vicinity; Figure 2. Project Location; Figure 3. Project Features**).

A summary of the existing 10 bridges including their length, width, spans and locations is listed below.

Bridge Name	Bridge Number	Existing Bridge Length	Existing Bridge Width	Original Number of Spans (Current Spans)	Location
Bristol Ditch	54C0272	40 feet	28 feet	2(2)	26.7 miles east of Crucero Rd
Cerro Ditch	54C0275	40 feet	28 feet	2(4)	1.3 miles east of Amboy Rd
Gordo Ditch	54C0276	40 feet	28 feet	2(4)	1.8 miles east of Amboy Rd
Cerulia Ditch	54C0277	40 feet	28 feet	2(4)	2.2 miles east of Amboy Rd
Leith Ditch	54C0279	40 feet	28 feet	2(4)	3.1 miles east of Amboy Rd
Terra Ditch	54C0280	40 feet	28 feet	2(4)	3.6 miles east of Amboy Rd
Sombra Ditch	54C0281	78 feet	28 feet	4(8)	4.1 miles east of Amboy Rd
Beacon Ditch	54C0282	40 feet	28 feet	2(4)	6.2 miles east of Amboy Rd
Larissa Ditch	54C0284	40 feet	27 feet	2(4)	1.1 miles east of Kelbaker Rd
Adena Ditch	54C0315	59 feet	28 feet	3(3)	21.9 miles east of Kelbaker Rd
Note – All but the Bristol Ditch have had supports added since the original construction. The bridges have also undergone some level of rehabilitation since then.					

B. Project Background

The 10 bridges were constructed in 1930 and span over man-made ditches or “flash flood washes”. The existing bridges vary in length (40 feet to 78 feet) but share similar construction components. The typical existing timber trestle bridges are composed of simply-supported timber stringer spans with a laminated timber deck with a concrete deck on it supported on timber strutted abutments and bents consisting of timber piles. The bridges are approximately 28 feet wide with guardrails that do not meet current AASHTO safety standards. According to Caltrans Structure Inventory and Appraisal Reports, nine (9) of the ten (10) existing bridges have a sufficiency rating less than 50 and are flagged “Structurally Deficient” (SD). The structural deficiency status is mainly due to a low superstructure rating attributable to damaged timber stringers.

Through the years, the bridges have been modified by various maintenance and repair work with the intent of maintaining public safety and prolonging the service life of the bridges. The proposed replacements will resolve all the bridge deficiencies and will remove the bridges from the Eligible Bridge List (EBL).

C. Project Description

The Project would replace 10 bridges on the National Trails Highway (NTH), also known as U.S. Route 66. Two alternatives are being considered for this Project - the Build Alternative and the No-Build Alternative.

Build Alternative (Build Alternative 1)

The existing bridges are proposed to be replaced with reinforced concrete bridges. The existing soil is sandy and susceptible to scour, so pile extensions would be utilized at the piers and the abutment foundation may be supported on piles. The bridge barrier would be either steel California ST-75 Bridge Rail or Concrete Barrier Type 85, painted white, which are both Manual for Assessing Safety Hardware (MASH) approved, and which best match the original railing. The bridge lengths would match the existing lengths, if possible, but would be lengthened as needed to convey the storm flows. The width of each replacement bridge would be 34 feet to accommodate two 11-foot lanes, two 4-foot shoulders and the two 2-foot railings. The vertical profile of the bridges will remain close to the existing profile except for those bridges locations in which it is determined that additional vertical clearance is required to provide sufficient water conveyance beneath the bridge. It is anticipated that any such necessary changes in vertical profiles would be 2 feet or less, with the elevation gradually conforming to the existing roadway elevations.

The NTH alignment would remain unchanged; however, approach road work, up to 800 feet, on either side of each bridge may be needed to conform to the vertical profile of the existing roadway. Grading along the approaches and around the bridges may be needed to ensure storm conveyance and drainage of the area.

A temporary, parallel road realignment, also referred to as a “shoo-fly detour”, would be constructed at each bridge location to accommodate through-traffic during construction. Construction of each bridge replacement is expected to be completed in one season, limiting the time the shoo-fly detour would be in place to one season as well.

Permanent acquisition of right-of-way is not anticipated to be needed; however, temporary construction easements may be needed to accommodate construction of the temporary detour lanes.

The existing utilities include a fiber optic telecommunication line which may require relocation as part of this Project. All utility relocations would be included within the defined limits of the Project area.

Typical equipment for roadway construction would include heavy construction earthmoving equipment, dump trucks and pavers. Typical bridge construction equipment would include cranes, pile drivers, excavators, and concrete pumps.

Transportation System Management (TSM) and Transportation Demand Management (TDM) Alternatives

Transportation System Management (TSM) strategies increase the efficiency of existing facilities primarily to reduce emissions by reducing congestion. Transportation Demand Management (TDM) focuses on regional means of reducing the number of vehicle trips and vehicle miles traveled, as well as increasing vehicle occupancy.

Although no specific TSM features are included as part of the Project, the overall Project serves a transportation system management purpose by providing safer operation of NTH within the limits; therefore, the Project is considered consistent with TSM goals and will support the continued safe and prolonged operation of NTH at each of the bridge locations.

Reversible Lanes

Assembly Bill 2545 amended California Streets and Highways Code to require, effective January 1, 2017, that Caltrans or a regional transportation planning agency demonstrate that reversible lanes were considered when submitting a capacity-increasing project or a major street or highway lane realignment project to the California Transportation Commission for approval (California Streets and Highway Code, Section 100.15)

The proposed Project is neither capacity-increasing nor a major realignment Project. Implementation of reversible lanes on any of the existing 10 bridges along National Trails Highway were not considered to be a viable alternative in lieu of replacement bridges, as they would not meet the Project's purpose of providing transportation facilities that meet County and Caltrans structural design standards.

No-Build (No-Action) Alternative

Under the No-Build alternative, the existing NTH bridges would not be replaced. The existing NTH bridges would continue to be rated "Structurally Deficient" by Caltrans under Federal Highway Administration prescribed inspection criteria. Failure of the bridges would likely occur. Therefore, under the No-Build alternative, the NTH bridges will be inconsistent with Countywide goals and policies outlined in the Circulation and Infrastructure Element in the 2007 County of San Bernardino General Plan.

Project Purpose

The purpose of the National Trails Highway at 10 Bridge Replacement Project is to replace structurally deficient bridges in order to:

- Enhance safety on National Trails Highway by providing new vehicular crossings for 10 bridges;
- Provide a transportation facility consistent with County and Caltrans Standards, as well as local and regional plans.

Project Need

The existing National Trails Highway Bridges are rated "Structurally Deficient" by Caltrans under Federal Highway Administration prescribed inspection criteria. All 10 existing bridges have sufficiency ratings from 22.2 to 61.2. All but Bristol Ditch have a sufficiency rating below 50. Full

replacement of the bridges is needed because the current structures do not meet structural design standards.

III. ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

In accordance with Guidelines Section 15082, the County prepared a Notice of Preparation (NOP) for the Project's Environmental Impact Report, which was submitted to the California State Clearinghouse on April 9, 2021, for distribution to other regulatory agencies that might like to comment on the Project. The NOP provided a project overview, the purpose and need of the Project, a project description, and a summary of known environmental issues which would require impact analysis in the DEIR. The 30-day comment period for the NOP started on April 13, 2021, and concluded on May 13, 2021. Two comment letters were received during the public circulation of the NOP. The comments were addressed within the document and are included in the FEIR Appendix E.

The DEIR for the proposed Project was then prepared and circulated for review and comment by the public, agencies, and organizations for a public review period of 45 days that began on November 3, 2023, and ended on December 21, 2023. A Notice of Completion of the DEIR was sent to the State Clearinghouse and the DEIR was circulated to State agencies for review through the State Clearinghouse online system (SCH No. 2021040231). A Notice of Availability of the DEIR for review was mailed to organizations and parties expressing interest in the Project, as well as property owners located within 500 feet of the Project area. The Notice of Availability was also published with the Victor Valley Daily Press newspaper.

The County received two comments: one comment from the Barstow Area of California Highway Patrol and one from the California Department of Fish and Wildlife. Responses to the comments received have been incorporated into the FEIR under Appendix E.

IV. SUMMARY OF IMPACTS

The FEIR concludes that the proposed Project will have **no significant impacts** and require no mitigation measures with respect to the following issues:

- Agriculture and Forest Resources
- Air Quality
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems

Potentially **significant impacts of the proposed Project will be mitigated** to below a level of significance with respect to the following issues:

- Aesthetics and Visual Resources
    - National Scenic Byway Designation
- Biological Resources
    - Revegetation and habitat restoration
    - Protection of special status species
    - Construction Work Window Restrictions
- Geology and Soils
- Hazards and Hazardous Materials
    - Proper handling and disposal of potential hazardous materials prior to and during construction
    - Evacuation Route and Emergency Services Access
- Hydrology and Water Quality
- Public Services
    - Evacuation Route and Emergency Services Access
- Transportation and Traffic
    - Implement a Traffic Management Plan to accommodate traffic during construction of the 10 bridges
- Wildfire
    - Evacuation Route and Emergency Services Access

No feasible mitigation measures are available to reduce impacts to below a level of significance for the following issues:

- Cultural Resources
    - Demolition of the Adena Ditch Bridge
    - Cumulative impact to the integrity and significance of the National Old Trails Road/Route 66

V. FINDINGS REGARDING SIGNIFICANT IMPACTS

A. Findings Regarding Impacts That Will be Mitigated to Below a Level of Significance (CEQA 21081(a)(1) and CEQA Guidelines 15091(a)(1)

The County, having reviewed and considered the information contained in the FEIR and the Record of Proceedings pursuant to Public Resources Code 21081(a)(1) and State CEQA Guidelines 15091(a)(1), adopts the following findings regarding the significant effects of the proposed Project, as follows:

> ***Changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the significant effects on the environment as identified in the FEIR (SCH No. 221040231) as described below:***

AESTHETICS AND VISUAL RESOURCES

Potentially Significant Effect – National Scenic Byway Designation

The entire stretch of the NTH on which the 10 existing bridges are within has been designated a National Scenic Byway by the United States Department of Transportation.

Within this scenic byway, the defining visual aspect features of the roadway include:

- NTH alignment, including the 10 proposed bridge replacement sites;
- Historic metal milepost markers, referred to here as Late 1950s Paddleboards, at the Bristol Ditch, Cerulia Ditch, Leith Ditch, and Terra Ditch;
- C-Markers marking the edge of ROW at the Cerro Ditch, Gordo Ditch, Cerulia Ditch, Terra Ditch, Larissa Ditch, and Adena Ditch;
- System of ditches and dikes (water control features); and
- Desert landscape.

Impacts to this resource could be significant.

Facts in Support of Finding
In general, the 10 replacement bridges and railings will closely match what motorists and residents see today. The overall NTH feel, which includes the raised NTH roadway, presence of timber bridges with asphalt decks, Late 1950s Paddleboards, historic right-of-way boundary markers (C-Markers), a system of ditches and dikes, and the desert landscape will remain the same from the viewpoint of nearby residents. Motorists would have a relatively short window of viewing and time span spent along each bridge due to their rate of travelling speed (approximately 55 mph).

The Late 1950s historic paddleboards would be damaged or destroyed if left in place during construction, which would degrade the NTH viewshed. To avoid this, each Late 1950s Paddleboard in the Project area will be rehabilitated through implementation of measure **CUL-3b**. This will involve removing them prior to construction, storing them in protective materials in a secure location during construction, implementing paint rehabilitation to better match their original coloration, and reinstalling them following construction. Historic photographs and examples of Late 1950s Paddleboards found along the NTH that are in better condition will be utilized as the guide for coloration. Repainting would in no way damage or destroy the original metal Paddleboard but would restore the faded lettering/numbering as well as the base color. This rehabilitation and reinstallation would result in a positive visual impact to the historic paddleboards and the overall historic roadway.

Similarly, if left in place, the C-Markers would be damaged or destroyed during construction, which would degrade the NTH viewshed for motorists. Implementation of **CUL-3b** will ensure that each C-Marker will be removed prior to construction, stored in protective materials during construction, and reinstalled following completion of construction, ensuring their preservation. Therefore, there would be no permanent visual impact to the C-Markers.

While various components of the NTH will be replaced, the overall NTH feel, which includes the raised NTH roadway, presence of bridges, Late 1950s Paddleboards, C-Markers, ditch/dike system, and the open desert landscape will remain the same from the viewpoint of motorists and nearby residents. While the timber components of the original bridges will be removed, the only view of timber components that motorists currently see are the wingwalls, which are only briefly visible as they pass across each bridge. The replacement concrete wingwalls will also only be briefly visible as motorists pass over the bridges, due to their rate of travelling speed (approximately 55 mph). As the elevated and straight NTH alignment would remain, the C-Markers will be preserved, the Late 1950s Paddleboards will be preserved/rehabilitated, the replacement railings will better match both the original and existing railings, the ditches/dikes would be minimally improved to match the lengthened bridges, and as the open desert landscape would remain unobscured, visual impacts to the overall NTH would be minimal through implementation of **CUL-3b.**

Rationale and Conclusion for Aesthetics and Visual Resources
Impacts caused to C-Markers and late 1950s historic Paddleboards, which are considered character defining components of the National Scenic Byway Designated NTH, during bridge demolition and construction activities could be potentially significant; however, those impacts would be reduced to a less than significant level by including mitigation measure **CUL-3b** which will ensure both resource types are temporary removed prior to construction, stored in protective materials, rehabilitated, and reinstalled following construction.

BIOLOGICAL RESOURCES

Potentially Significant Effect (Special Status Plant Species)

Database searches, literature review, habitat assessment, and biological surveys determined that there are three special status plant species with the potential to occur in the Project area including: glandular ditaxis (Ditaxis claryana), small-flowered androstephium (Androstephium breviflorum), and pointed dodder (Cuscuta californica var. apiculata). Biological surveys did not identify any of these three species within the Project area. Temporary and permanent impacts could occur during construction of the Project, due to vegetation removal and construction access. The Project also has the potential to result in indirect impacts to special status plant species that may occur within habitat surrounding the Project area, through the accidental spread of non-native, invasive species that would lead to competition with native plants.

Facts in Support of Finding
The County will mitigate potential impacts to these plant species by implementing avoidance, minimization, and mitigation measures **BIO-9** through **BIO-11** and **BIO-23**. These measures would function to inform construction personnel of the potential presence of special status plants, identify any existing populations of special status plants within the Project area prior to construction (through biological preconstruction surveys), minimize clearing and grubbing of special status plant habitat, and reduce the spread of invasive plants.

Preconstruction surveys include a rare plant survey that will be conducted by an authorized biologist during the ideal blooming period prior to the beginning of construction activities. If individuals or populations of rare plants are observed within the Project area during this survey, the area around the rare plant will be marked with high-visibility Environmentally Sensitive Area (ESA) fencing. Project activities will not be permitted to encroach upon the fencing and vegetation removal will not be authorized within the boundaries of said fencing.

Potentially Significant Effect (Animal Species)

Common bird species identified within the Project area during biological surveys include common raven (Corvus corax) and Say's phoebe (Sayornis nigricans). Database research identified two special-status bird species with potential to occur within the Project vicinity: prairie falcon (Falco mexicanus) and burrowing owl (Athene cunicularia). The prairie falcon is on the California Department of Fish and Wildlife's Watch List and is normally found in dry, open habitats. Prairie falcons require arid, open terrain for foraging and require cliffs or rock outcrops for nesting. Although the Project area occurs in open desert habitat, it lacks suitable breeding habitat. Furthermore, no individuals of the species were observed during the biological surveys conducted in October 2020. Due to lack of suitable habitat for reproduction and lack of local species occurrences, the prairie falcon is presumed absent from the Project area. The burrowing owl is a California Department of Fish and Wildlife Species of Special Concern (SSC). Burrowing owls rely on California ground squirrels and other fossorial mammals for burrow construction. This species utilizes burrows year-round for roosting and nesting. The Project area provides suitable foraging habitat for the burrowing owl, however, during the biological surveys, few mammal burrows were observed in the Project area, and no burrowing owl individuals or evidence of burrowing owls was observed. Due to potentially suitable foraging habitat within the Project area, the burrowing owl has a low potential to be transient through the working area of the Project.

No mammal species were observed within the Project area during field surveys; however, evidence of mammalian use of the Project area was observed, including burrows and feces. Additionally, bats may utilize the bridge structures for roosting and the formation of maternity colonies. Database research identified two mammal species with potential to occur within the Project vicinity: desert bighorn sheep (Ovis canadensis nelsoni) and desert kit fox (Vulpes macrotis arsipus). The desert bighorn sheep is listed as Fully Protected by the California Department of Fish and Wildlife. This species occurs in desert mountain ranges and will descend into lower elevation habitats near water in order to forage. This species has a low to moderate potential to occur within the vicinity of the Project due to local historic CNDDB occurrences as well as the potentially suitable foraging habitat present in the Project area. The desert kit fox is a subspecies of kit fox native to the Mojave and Colorado deserts, where it relies on sparsely vegetated scrub habitats that can support an abundant rodent prey population. Desert kit foxes require friable soils for excavating dens, which they use year-round for cover, thermoregulation, and rearing young. No dens, tracks, scat or other signs of kit foxes were observed within the Project area during the biological surveys conducted for the Project. Furthermore, there are no CNDDB occurrences of the species within or near the Project area. Due to potentially suitable foraging habitat, the desert kit fox has a low potential to be transient through the working area of the Project.

Locally common reptile species observed during biological surveys of the Project area include Great Basin whiptail (Aspidoscelis tigris tigris) and western zebra-tailed lizard (Callisaurus draconoides rhodostictus). In addition, database research indicates that a special status reptile species has the potential to occur within the Project vicinity: desert tortoise (Gopherus agassizii), which is discussed under "Potentially Significant Effect (Threatened and Endangered Species)".

Facts in Support of Finding

Per measure **BIO-24**, if construction activities begin during the nesting bird season, a biological preconstruction survey will occur prior to construction and a no disturbance buffer will be established around any active nest until it is determined that the nest is no longer active. Similarly, per measure **BIO-25**, a preconstruction bat survey will also be completed by a qualified biologist prior to construction activities. If a maternity colony is found within the Project area, a qualified bat biologist shall prepare a bat eviction plan in order to evict bats during the appropriate non-

pupping season, from September 1 to October 15 or March 15 to April 15. If no maternity colony or potential maternity colony is identified, work may proceed as scheduled and no additional considerations for bat species are required.

Per measure **BIO-30**, a preconstruction survey for the desert kit fox must also be conducted by a qualified biologist. If potential dens are located, they shall be monitored by an authorized project biologist. Trail cameras may be used to assist with observation but shall not be the sole basis upon which the status is determined. Should active dens be present within the Project area that cannot be avoided with an adequate buffer, and construction cannot be rescheduled at that location, the project biologist shall contact California Department of Fish and Wildlife to determine if monitoring or relocation is required. No disturbance or relocation of active dens may take place when juveniles may be present and dependent on parental care. A qualified biologist shall block off inactive dens within the buffer zone with rocks and sticks to discourage use during Project activities and remove when construction is complete.

Finally, if any desert bighorn sheep are observed within the Project area, per measure **BIO-12**, work will be halted until the individual(s) have left the Project area and no direct contact is allowed. The species must be allowed to move throughout the Project area undisturbed by humans, vehicles, or construction machinery.

Potentially Significant Effect (Natural Communities)

The natural communities identified within the Project area are ephemeral ditches and creosote bush scrub. Ephemeral ditches are present under each bridge in the Project area and are intermittently wetted. Creosote bush scrub is also present at each bridge location. Both communities will be impacted by Project construction.

Facts in Support of Finding

The County will coordinate with the Regional Water Quality Control Board and the California Department of Fish and Wildlife to obtain the appropriate permits which would authorize construction activities within their jurisdiction. Implementation of permit requirements and avoidance, minimization, and mitigation measures **BIO-1** through **BIO-8** and **BIO-22** through **BIO-29** would ensure that impacts to both the ephemeral ditches and the creosote bush scrub are minimized where possible.

While there is a potential for significant impacts to ephemeral ditches and creosote bush scrub as a result of project construction, these impacts would be mitigated to a less than significant level through implementation of measures **BIO-1** through **BIO-8** and **BIO-22** through **BIO-29**.

Potentially Significant Effect (Threatened and Endangered Species)

One federally and/or state listed species has the potential to occur within the Project vicinity, the federally threatened and state endangered desert tortoise. Desert tortoise final critical habitat is present within the Project area at the Adena Ditch Bridge site. Additionally, general biological surveys, a habitat assessment, and focused desert tortoise surveys indicate that the species has a high potential to occur within the Project area at the Adena Ditch Bridge, due to the designated final critical habitat present. There is low potential for the species to occur at the nine remaining bridges due to the sparse population mapping and heat/dryness associated with the lower elevation.

Facts in Support of Finding

A preconstruction survey for desert tortoise and their burrows within the Project area shall be completed by the authorized biologist. Additionally, within 24 hours of the start of soil disturbance, another preconstruction clearance survey for desert tortoise will be conducted by the authorized biologist. If a tortoise or tortoise sign is found in the impact areas or within the immediate vicinity during either pre-construction survey, allowed to move outside the construction area/exclusionary area on their own before the Project can commence installation of exclusionary fencing, on-site construction preparation activities, or any construction activities. Regardless of whether evidence of desert tortoise is identified during the preconstruction survey, temporary desert tortoise fencing will be installed under supervision of the Project biologist along the Project limits to prevent tortoises from entering the Project area during construction. Exclusionary fencing must be in compliance with the standards outlined in the 2009 USFWS Desert Tortoise (Mojave Population) Field Manual.

Following construction, all natural areas that have experienced vegetation removal and disturbance for construction access purposes would be seeded with a desert creosote bush scrub native seed mix and allowed to return to pre-construction conditions. While this temporary loss of vegetation could cause reduced shelter and forage opportunities for the desert tortoise, it is considered a minor stressor as the Project would mostly impact vegetation that is adjacent to urban, paved areas that are already unvegetated.

Installation of rock slope protection would permanently reduce critical habitat; however, the area over which these impacts would occur is anticipated to be minor. In addition, these effects would not extend to nearby undisturbed critical habitat and would not impact the quality of desert tortoise critical habitat as a whole. The County will implement conservation measure **BIO-29** to ensure that rock slope protection is installed in such a way that would not cause direct harm to desert tortoise. Measure **BIO-29** requires the interstitial spaces within the rock slope protection to be filled with substrate to prevent trapping of desert tortoise. Therefore, permanent effects due to rock slope protection installed within the Project area may affect but are not likely to adversely affect desert tortoise critical habitat.

As there is a potential for both temporary and permanent effects such as noise, vibrations, and vegetation removal from suitable habitat to impact the desert tortoise during construction, species-specific protective measures, **BIO-13** through **BIO-22**, would be implemented at all 10 bridge sites in order to avoid and minimize temporary construction related stressors on desert tortoises in the Project area. Measures **BIO-7** and **BIO-8** would also further minimize temporary impacts to desert tortoise.

While there is a potential for significant impacts to the desert tortoise and final critical habitat for the desert tortoise as a result of project construction, these impacts would be mitigated to a less than significant level through implementation of measures **BIO-7** through **8, BIO-13** through **BIO-22**, and **BIO-29**.

Rationale and Conclusion for Biological Resources

The individual actions making up mitigation measures **BIO-1** through **BIO-29** will assure that impacts to biological resources, including natural communities, special status animal species, and threatened and endangered species are avoided and minimized to the greatest extent feasible. Impacts to these biological resources are potentially significant but would be substantially reduced to a less than significant level through implementation of these specific 39 biological avoidance, minimization, and mitigation measures. Implementation of these measures would be assured through incorporation of into the MMRP which will be reviewed and implemented by the County.

GEOLOGY AND SOILS

Potentially Significant Effect – Soil Erosion

Construction of the proposed Project would cause disturbances to the ground surface from earthwork, including excavating and grading, which would result in a potential for soil erosion which could be a significant impact.

Facts in Support of Finding
Implementation of measure **BIO-1** which details best management practices, including industry standard practices regarding soil stabilization both during and post construction, would ensure impacts related to soil erosion are Less than Significant with Mitigation Incorporated.

Potentially Significant Effect – Paleontological Resources

A Paleontological Identification and Evaluation Report found the Project area to be underlain by alluvial fan sediments that typically do not yield fossils. Due to the arid nature of the region, the location of all bridges on alluvial fans, the lack of potential for burial, and observations during the field survey, all bridge replacement areas within the Project are assigned a low sensitivity for paleontological resources; however, this does not preclude the presence of such resources. This could result in a significant impact.

Facts in Support of Finding
If unanticipated discoveries of paleontological resources occur during construction, the County will implement measure **PAL-1** which requires a halt all work within 50 feet of the discovery until the find has been evaluated by a qualified paleontologist.

Rationale and Conclusion for Geology and Soils
The individual actions making up mitigation measures **BIO-1** and **PAL-1** will assure that soil erosion will be minimal and that no significant paleontological resources will be adversely impacted by the Project.

HAZARDS AND HAZARDOUS MATERIALS

Potentially Significant Effect

The proposed demolition of the existing timber bridges and construction of new concrete bridges has the potential to encounter hazards or hazardous materials during construction which could present a health and human safety concern for construction workers and adjacent property owners. Potential hazardous materials include lead-based paint of the wood bridge timbers, heavy metals in pavement striping, and treated lumber. Additionally, emergency service access to and through the Project areas as well as evacuation routes might be impeded by construction. This could result in a significant impact.

Facts in Support of Finding
Potential hazardous materials have been identified through primary identification efforts which requires proper handling and disposal during construction. Implementation of measures **HAZ-1** through **HAZ-4** will ensure that yellowing pavement striping and lumber which likely contains lead based paint and has been treated with chemicals (i.e., creosote) will be removed and disposed of per current Department of Toxic Substances and the Caltrans Standard Special Provisions.

Regarding emergency services, implementation of TRA-1 will ensure that a Traffic Management Plan would be prepared prior to construction and be implemented during construction of the Project to reduce disruption of traffic patterns. Public information and awareness campaigns, motorist information strategies, and incident management strategies would alert the public of the temporary construction shoo-fly detours and the Project. Should emergency services require access to or through the Project area, the temporary roadway diversions which parallel the roadway at each project location will be utilized by the emergency vehicles to ensure impacts to emergency response services remain minimal.

Rationale and Conclusion for Hazards and Hazardous Materials
Impacts caused by hazards or hazardous materials identified or unexpectedly discovered on site could be potentially significant; however, those impacts would be reduced to a less than significant level by including mitigation measures **HAZ-1** through **HAZ-4** and **TRA-1** to protect the human and natural environment during and after construction.

HYDROLOGY AND WATER QUALITY

Potentially Significant Effect

The 10 bridges within the Project area all carry the NTH over a series of man-made ditches that collect flow from numerous, rills, gullies, and small ephemeral channels on the upslope side of the roadway and convey it under the roadway. These ditches are intermittently flooded, with surface water typically only present in direct response to rain events. Construction of the proposed Project would cause disturbances to the ground surface from earthwork, including excavating and grading. These activities would potentially increase the amount of sediments entering ephemeral ditches. As the ditches will be regraded and as the bridge heights will be sufficient to convey water flow even during flood events, there will be impacts to hydrology. This could result in a significant impact.

Facts in Support of Finding
While the Project could result in a potential increase of sediments entering ephemeral ditches, the Project would occur when the ditches are dry. Impacts regarding water quality would be reduced to a less than significant level through implementation of measures **BIO-1** through **BIO-7,** which require use of current industry standards regarding best management water quality/erosion practices, refueling away from ditches, use of chemical spill kits, and use of secondary containment underneath all equipment/materials located in a natural area.

Rationale and Conclusion for Hydrology and Water Quality
While the Project does have potential to impact water quality through the introduction of increased sediment or contaminants, those impacts would be reduced to a less than significant level by including mitigation measures BIO-1 through BIO-7 to protect the natural environment during and after construction.

PUBLIC SERVICES

Potentially Significant Effect

Emergency service access to and through the Project areas as well as evacuation routes might be impeded by construction. This could result in a significant impact.

Facts in Support of Finding
Implementation of **TRA-1** will ensure that a Traffic Management Plan would be prepared prior to construction and be implemented during construction of the Project to reduce disruption of traffic patterns. Public information and awareness campaigns, motorist information strategies, and incident management strategies would alert the public of the temporary construction shoo-fly detours and the Project. Should emergency services require access to or through the Project area, the temporary roadway diversions which parallel the roadway at each project location will be utilized by the emergency vehicles to ensure impacts to emergency response services remain minimal.

Rationale and Conclusion for Public Services
While the Project does have potential to impede emergency services and/or evacuation routes, those impacts would be reduced to a less than significant level through implementation of measure **TRA-1** during construction.

TRANSPORTATION AND TRAFFIC

Potentially Significant Effect

Emergency service access to and through the Project areas as well as evacuation routes might be impeded by construction. This could result in a significant impact.

Facts in Support of Finding
Implementation of **TRA-1** will ensure that a Traffic Management Plan would be prepared prior to construction and be implemented during construction of the Project to reduce disruption of traffic patterns. Public information and awareness campaigns, motorist information strategies, and incident management strategies would alert the public of the temporary construction shoo-fly detours and the Project. Should emergency services require access to or through the Project area, the temporary roadway diversions which parallel the roadway at each project location will be utilized by the emergency vehicles to ensure impacts to emergency response services remain minimal.

Rationale and Conclusion for Transportation and Traffic
While the Project does have potential to impede emergency services and/or evacuation routes, those impacts would be reduced to a less than significant level through implementation of measure **TRA-1** during construction.

WILDFIRE

Potentially Significant Effect

Emergency service access to and through the Project areas as well as evacuation routes might be impeded by construction. This could result in a significant impact.

Facts in Support of Finding
Implementation of **TRA-1** will ensure that a Traffic Management Plan would be prepared prior to construction and be implemented during construction of the Project to reduce disruption of traffic patterns. Public information and awareness campaigns, motorist information strategies, and incident management strategies would alert the public of the temporary construction shoo-fly detours and the Project. Should emergency services require access to or through the Project area, the temporary roadway diversions which parallel the roadway at each project location will

be utilized by the emergency vehicles to ensure impacts to emergency response services remain minimal.

Rationale and Conclusion for Wildfire
While the Project does have potential to impede emergency services and/or evacuation routes, those impacts would be reduced to a less than significant level through implementation of measure **TRA-1** during construction.

B. Findings Regarding Mitigation Measures Which are the Responsibility of Another Agency (CEQA 21081(a)(2) and CEQA Guidelines 15091(a)(2)

The County, having reviewed and considered the information contained in the FEIR and the Record of Proceedings, finds pursuant to CEQA 21081(a)(2) and State CEQA Guidelines 15091(a)(2), that there are no changes or alterations which could reduce significant impacts that are the responsibility and jurisdiction of another public agency.

C. Findings Regarding Infeasible Mitigation Measures and Avoidance Alternatives (CEQA 21081(a)(3) and CEQA Guidelines 15091(a)(3)

The County, having reviewed and considered the information contained in the FEIR and the Record of Proceedings pursuant to Public Resources Code 21081(a)(3) and State CEQA Guidelines 15091(a)(3), makes the following findings regarding Cultural Resources (historic bridge structure):

> ***Specific economic, legal, social, technological, or other considerations, including considerations of the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the FEIR (SCH No. 2015031038) as described below:***

No avoidance alternatives are identified in the FEIR for those significant impacts arising from demolition of the Section 106 of the National Historic Preservation Act eligible cultural resources: National Trails Highway (segment between Daggett and Mountain Springs Road) and the Adena Ditch Bridge reduced impacts to a less than significant level. While mitigation measures have been identified which will reduce the significant impacts to both cultural resources, the County has determined that these mitigation measures will not reduce impacts to a less than significant level, for either resource. This finding is appropriate, however, because there are no feasible mitigation measures available that would reduce identified impacts to below a level of significance.

Feasible is defined in Section 15364 of the CEQA Guidelines to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The CEQA statute (Section 21081) and the Guidelines (Section 15019(a)(3)) also provide that “other” considerations may form the basis for a finding of infeasibility. Case law makes clear that a mitigation measure or alternative can be deemed infeasible on the basis of its failure to meet project purpose and/or need or on related public policy grounds.

CULTURAL RESOURCES

Significant Effect

The proposed Project will require complete demolition of 10 timber bridges along the historic National Old Trails Road/Route 66 (CA-SBR-2910H) and modifications to the roadway approaches at all 10 locations. The present roadway alignment consists of an average paved roadway width (including paved shoulders) of up to 36 feet, and an average bridge width varying between 25-26 feet. The roadway at each bridge is often elevated to provide additional height or depth to the channel of the ditch or wash at each bridge. The raised roadbed allows for views of the surrounding desert landscape and of the timber wingwalls or abutments at many bridge locations. The character defining features of the roadway include the historic-period cross section, raised roadbed, presence of bridges and roadway features from the period of significance within the road corridor, and the rural desert landscape/setting. The character defining features of the National Old Trails Road/Route 66 (CA-SBR-2910H) include the roadway, the Adena Ditch Bridge, C-Markers, and the Late 1950s Paddleboards.

The Project will introduce thousands of feet of improved roadway which will cumulatively affect the setting for the remaining character defining features of the property. The new roadway, up to 800 feet on either end of each new bridge, will represent “feathered” (tapered) widening to account for the fact that the new bridges will be slightly wider than the historic roadway at these 10 bridge locations. The new bridges will be concrete, wider, and have a slight raise in the vertical profile than the existing timber bridges. The Project will also introduce new bridge railings that differ visually from the types of bridge railings found elsewhere on National Old Trails Road/Route 66 (CA-SBR-2910H). The new railings may be a California ST-75 Bridge Rail type or Concrete Barrier Type 85, painted white, both of which are MASH approved. These railing types are somewhat similar to but certainly not identical to the original wooden or the more modern steel railings typically found along the National Old Trails Road/Route 66 (CA-SBR-2910H). These railings, as noted, are the only aspect of the new bridges visible to the motoring public.

While the C-Markers and Late 1950s Paddleboards will be preserved, the demolition of the bridges, including the character defining Adena Ditch Bridge, introduction of new modern visual elements, and changes to the historic setting as a result of the wider bridge, modified vertical profile, and modern railings will result in a significant and unavoidable cumulative impact to both the National Old Trails Road/Route 66 (CA-SBR-2910H) and the Adena Ditch Bridge.

Facts in Support of Finding

The County has studied Project alternatives that would avoid significant impacts to the National Old Trails Road/Route 66 (CA-SBR-2910H) and the Adena Ditch Bridge. These alternatives include the No-Build Alternative, Build Alternative 2 (Improved Water Flow Conveyance - Lengthening the Bridges or Increasing the Vertical Profile), Build Alternative 3 (Timber or Precast Bridge Structure Types), and Bridge Alternative 4 (Bridge Location).

Under the No-Build alternative, the existing 10 bridges would not be replaced and would continue to be rated “Structurally Deficient” by Caltrans under Federal Highway Administration prescribed inspection criteria. Failure of the bridges would likely occur, which would constitute a significant impact to the National Old Trails Road/Route 66 (CA-SBR-2910H) and the Adena Ditch Bridge, and the roadway would remain closed to traffic and present a danger to public safety. Therefore, under the No-Build alternative, the NTH bridges will be inconsistent with Countywide goals and policies outlined in the Circulation and Infrastructure Element in the 2007 County of San Bernardino General Plan.

Build Alternative 2 (Improved Water Flow Conveyance - Lengthening the Bridges or Increasing the Vertical Profile) involved either lengthening the bridges or increasing the vertical profile to ensure clearances were sufficient to convey the required water flow; however, this alternative

would require more noticeable visual impacts National Old Trails Road/Route 66 (CA-SBR-2910H) and would require more extensive biological impacts. A balanced approach of limiting the increase in the vertical bridge profile to 2 feet and lengthening the bridge as needed to convey the water flow was used as Build Alternative 1 to minimize impacts to sensitive biological habitats and cultural resources, and to prevent excessive Project cost. For these reasons, Build Alternative 2 was not pursued and is considered eliminated from further consideration.

Build Alternative 3 (Timber or Precast Bridge Structure Types) considered using a precast bridge structure type or timber bridges as the replacement structures. Replacing the bridges with similar timber bridges was considered to maintain the visual character of the overall National Old Trails/Route 66 (CA-SBR-2910H). Additionally, the initial cost to replace the structures with timber is less than utilizing concrete bridges. However, two recent bridge replacements which utilized timber replacement bridges have since developed issues with cracking in the timbers, requiring substantial repair and anticipated on-going regular inspections to ensure further degradation does not jeopardize the structure. As a result, utilizing timber bridges as replacement structures for the Project would require more repair and maintenance than is expected for a new structure. Such frequent maintenance would also result in more frequent impacts to sensitive biological habitats due to encroachment by construction equipment into sensitive biological habitats. Finally, timber superstructures would require more supports in the ditches/channels than other structure types, which would also result in additional permanent impacts to sensitive biological resources, and allow for more channel obstructions, hence reducing the flow conveyance of the channel. Due to the shorter anticipated life span, unreliable nature of timber, the associated maintenance issues, environmental impacts, and hydrological impacts, use of timber replacement structures were eliminated from further consideration as a viable design option.

Precast concrete structures have similar advantages to cast-in-place concrete structures. They have longer life span, minimal maintenance required, and are able to span longer distances. However precast concrete structures are more expensive than cast-in-place. For this reason, use of precast concrete structures was eliminated from further consideration as a viable design option.

Bridge Alternative 4 (Bridge Location) considered different options for placement of the replacement bridge. Options included maintaining the existing bridges in place during construction to maintain through traffic and constructing the replacement bridge and roadway approach immediately adjacent; or full closure of the road during construction to allow for construction of the replacement bridge in the same location.

Implementing the first option would result in a permanent shift in the road introduced in an otherwise straight alignment. This would also require a new roadway approach be built to connect the replacement bridge with the existing roadway. Such proposed work would result in a larger environmental impact footprint than Build Alternative 1, which would impact sensitive biological resources and significant cultural resources, including potentially a significant impact to the entire National Old Trails Road/Route 66 (CA-SBR-2910H). The second option requires either a 73-mile paved temporary detour or a 7-mile unpaved temporary detour using existing roads which would also need improvements to allow for heavy trucks. These lengthy detours would result in a much larger environmental impact footprint, i.e. greater impacts to sensitive biological resources and significant cultural resources than Build Alternative 1. Further, both options would have higher Project costs than Build Alternative 1. For these reasons, Build Alternative 4 is considered eliminated from further consideration.

Other than these avoidance alternatives, which have been determined to be infeasible, no mitigation measures or project features have been identified that are not already a part of the Project (to the extent feasible) that could mitigate this impact to a less than significant level. In

coordination with Caltrans Environmental Staff (as part of the Project's National Environmental Policy Act compliance) and the California State Historic Preservation Officer, the County has identified mitigation measures which will reduce significant impacts to the historic National Old Trails Road/Route 66 (CA-SBR-2910H) and the Adena Ditch Bridge, but the County has determined that these measures will not reduce the impact below a significant level. These measures include preparing a National Register of Historic Places Nomination; development of a website to share historic and other Route 66 road-related information for the benefit of the general public; preservation and rehabilitation of Late 1950s Paddleboard during construction; and preservation of the C-Markers during construction, following Secretary of the Interior's Standards for Rehabilitation. Rehabilitation of the Late 1950s Paddleboards will involve paint refurbishment to better match the original coloration before reinstallation.

Rational and Conclusion for Cultural Resources

The County has evaluated other alternatives and found that they would either not be feasible and/or prudent, or would also result in an adverse effect and significant impact to the National Old Trails Road/Route 66 (CA-SBR-2910H) and the Adena Ditch Bridge. As such, the County has coordinated with Caltrans and the State Historic Preservation Officer to identify measures that would reduce the severity of these significant impacts; however, these impacts are not able to be mitigated to a less than significant level.

VI. STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to CEQA Section 21081 and Guidelines Section 15091, the County has adopted all feasible mitigation measures with respect to the Project's significant impacts and determined that no feasible mitigation measures exist for the Project's unavoidable adverse impacts to Cultural Resources. The County has also examined alternatives to the proposed Project and determined that none of the alternatives analyzed in the FEIR are feasible because they fail to meet the Project's basic purpose and need, and/or fail to provide sufficient environmental benefits compared to the Project.

As required by CEQA Section 21081(b) and Guidelines Section 15093, the County has balanced the specific economic, legal, social, technological, and other benefits of the proposed Project against its unavoidable adverse impacts and has determined that the benefits outweigh the impacts, so the unavoidable adverse impacts described above are considered "acceptable." This determination is based on the following specific benefits, each of which is determined to be by itself and independent of the other project benefits, a basis for overriding and outweighing all unavoidable adverse environmental impacts identified in the FEIR.

A. Social and Public Safety Benefits

- The Project will replace 10 bridges along the NTH. These 10 bridges are rated "Structurally Deficient" by Caltrans under Federal Highway Administration prescribed inspection criteria. All 10 existing bridges have sufficiency ratings from 22.2 to 61.2. All but Bristol Ditch have a sufficiency rating below 50. Full replacement of the bridges is needed because the current structures do not meet structural design standards. The new structures will be consistent with Caltrans standards, as well as local, regional, and statewide plans, for bridge infrastructure improvement.
- The replacement bridges will also allow this section of NTH between Amboy and Essex to reopen to the public and will enhance safety along the NTH. Reopening this segment of

the NTH will also allow recreational NTH/Route 66 tourism and provide a crucial evacuation and public services route.

B. Economic Benefits

- Reopening this segment of the NTH will allow recreational NTH/Route 66 tourism which benefits the businesses and communities located along, and in the vicinity of, the NTH. Without the Project, businesses that rely heavily on NTH/Route 66 tourism would need to relocate or permanently close as there would be no further use of this area for NTH/Route 66 tourism due to inaccessibility.

VII. CONCLUSION

For the foregoing reasons, the County concludes that the National Trails Highway at 10 Bridges Project will cause certain unavoidable significant environmental impacts but will result in numerous public benefits which outweigh the adverse impacts. Therefore, the County adopts the Findings and this Statement of Overriding Considerations.