



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

Sep 26 2023

September 25, 2023

STATE CLEARINGHOUSE

Jennifer Pollom
Shasta Regional Transportation Agency
1255 East Street, Suite 202
Redding, CA 96001

**SUBJECT: REVIEW OF THE SUPPLEMENTAL PROGRAMMATIC
ENVIRONMENTAL IMPACT REPORT FOR THE 2022
REGIONAL TRANSPORTATION PLAN, STATE
CLEARINGHOUSE NUMBER 2014022018, SHASTA COUNTY**

Dear Jennifer Pollom:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Supplemental Programmatic Environmental Impact Report (SEIR) dated August 2023, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish and Game Code, §§ 711.7, subd. (a) & 1802; Public Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the

¹CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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California Endangered Species Act (CESA) (Fish and Game Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Project Description

“The 2022 [Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS)] illustrates how [Shasta Regional Transportation Agency (SRTA)] will meet the transportation needs of the region for the period from 2022 to 2042, considering existing and projected future land use patterns as well as forecasted population and job growth...The RTP/SCS identifies and prioritizes expenditures of anticipated funding for transportation projects that involve all transportation modes: highways, streets and roads, transit, rail, bicycle and pedestrian; aviation, as well as transportation demand management (TDM) and transportation system management (TSM)....The 2022 RTP/SCS transportation improvements project list includes 72 new minor transportation projects.”

Project Comments and Recommendations

Since 2014, CDFW has commented on SRTA DEIR's for the RTP and SCS, as the plans and environmental documents are continuously updated to meet the needs of the region during a specific timeframe. In 2018, CDFW commended the SRTA for the attention to detail provided with each avoidance and minimization measure (AMM) pertaining to biological resources. Such measures remain in the 2022 SEIR. CDFW recognizes that the 2022 RTP and SEIR are programmatic, and that the AMM's do not specify specific projects. With that in mind, CDFW finds that the majority of the listed AMM's are adequate in generally avoiding and minimizing impacts to biological resources, however, CDFW offers the following comments and recommendations below to further assist SRTA in adequately identifying and/or mitigating significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Connectivity

Connectivity refers to the degree that organisms or natural processes can move unimpeded across habitats – both terrestrial and aquatic. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them. A functional network of connected habitats is essential to the continued existence of California's diverse species and natural communities, in the face of both human land use and climate change. Climate change may impact both the quality and distribution of habitat and shift the known and historical ranges of species. Thus, connectivity is important to allow for wildlife to adapt, adjust, and move in response to

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climate change. Habitat connectivity is also necessary to reduce wildlife-vehicle collisions, which put people and wildlife at risk of injury or death.

On October 8, 2021, Governor Gavin Newsom approved Senate Bill 790², which summarizes the need for habitat connectivity and wildlife corridors to mitigate climate change impacts as well as reduce human impacts on species. On September 30, 2022, Governor Gavin Newsom approved Assembly Bill 2344³ which requires Caltrans, CDFW, and other appropriate agencies to establish an inventory of barriers to wildlife movement and prioritize crossing structures when building or improving roadways. Fish and Game Code 1930.5 (c) (1) calls for the protection of wildlife corridors, following for migration and movement of species by providing connectivity between habitats, installation of wildlife fence, and provision of roadway crossings to allow movement of wildlife. The planned projects in the RTP will likely result in increased traffic volume, wider roadways or other features that will increase vulnerability of wildlife to vehicle mortality and increase habitat fragmentation.

CDFW recommends including habitat connectivity in the updated RTP and SEIR, to ensure wildlife corridors and migration routes are identified, mapped and preserved, large natural habitat blocks are not divided, but rather link existing natural habitat blocks across landscapes, and to strive for improved regional connectivity for the safety of those that utilize California's transportation systems, and for California's wildlife. CDFW also encourages the incorporation of wildlife connectivity structures, including but not limited to underpasses, upsized culverts, exclusionary deer fence and/or jump-out features into suitable projects of the 72 new projects listed.

For more information regarding the importance of habitat connectivity, framework for local analyses and implementation, the California Essential Habitat Connectivity Project may be a useful resource:

<https://wildlife.ca.gov/Conservation/Planning/Connectivity/CEHC>.

Avoidance and Minimization Measures

Some AMM's included in the SEIR use vague phrases such as "*if feasible*," "*where feasible*" or "*where economically feasible*." CDFW encourages the SRTA to remove vague and unenforceable language and instead incorporate more determinate language into the AMM's.

Measure B-1(f): Endangered/Threatened Species Avoidance and Minimization

Measure B-1(f), that specifically addresses listed species, should be revised to state "All projects occurring within/adjacent to aquatic habitats (including riparian habitats and wetlands) shall be completed during the typical low flow period or when water is unlikely to be present (generally between **June 1** and October 31), ~~if feasible~~, to avoid impacts to sensitive aquatic species. Additional

² https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB790


³ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2344

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timing restrictions shall be incorporated into the project schedule on a species by species basis in coordination with the resource agencies (e.g. National Marine Fisheries Service, CDFW, USFWS)".

CDFW appreciates the opportunity to offer comments and recommendations that may assist the SRTA in adequately analyzing and minimizing impacts to biological resources. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist (Specialist), by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
Northern Region

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