



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

December 12, 2022

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STATE CLEARINGHOUSE

Skylar Fisher
 Associate Planner
 County of Trinity
 PO Box 2819
 Weaverville CA, 96093

SUBJECT: Review of the Initial Study and Negative Declaration for 2022 Trinity County Local Transportation Plan, State Clearing House Number 2022100634, Trinity County

Dear Skylar Fisher:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study and Negative Declaration (ISND) dated October 2022, for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, the Department administers the California Endangered Species Act and other provisions of the Fish and Game Code that conserve the California fish and wildlife public trust resources. The Department offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code §21000 et seq.

Project Description

The Project as described in the ISND is as follows:

“The [Regional Transportation Planning Association] is required by California law to adopt and submit an updated Regional Transportation Plan (RTP) to the California Transportation Commission (CTC) and to the California Department of Transportation (Caltrans) every five years. The last update to the Trinity County RTP was adopted in 2016. The horizon year for the 2022 Trinity County RTP is 2042, with transportation improvements in the RTP identified as short term (0-5 years), mid term (6-10 years) or long-term (11-20 years).

The overall focus of the 2022 RTP is directed at developing a coordinated and balanced multimodal regional transportation system that is financially constrained to the revenues anticipated over the life of the RTP. The coordination focus brings the County, Caltrans, local communities, governmental resource agencies, commercial

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interests, and residents into the planning process. The balance is achieved by considering investment and improvements for moving people and goods across all modes including roads, transit, bicycle, pedestrian, trucking, and aviation, and by performing a robust stakeholder and community engagement process throughout the RTP development.”

Comments and Recommendations

State Wildlife Action Plan

The Department acknowledges that the ISND identifies Trinity County’s diverse ecosystems, and that the action items in the updated RTP are assured to be aligned with conservation strategies included in the California State Wildlife Action Plan (SWAP). However, it is unclear why the ISND considers the major stressors in the Central Valley and Sierra Nevada Region, in place of stressors identified for the North Coast Klamath Region.

The ISND states “Although Trinity County is located within the Trinity Alps, Klamath Mountains and Coastal Range, the California state Wildlife Action Plan was not developed on a county-basis. The larger region that applies to Trinity County contains species, stressors and recommended actions that are not relevant to Trinity County. For a complete list of actions suggested for wildlife management in Trinity County, see Attachment C of the Regional Transportation Plan.”

Although the SWAP was not developed as a county-based plan, the North Coast Klamath section¹ does contain species, stressors, and recommended actions relevant to Trinity County. The Department recommends the Trinity County Transportation Commission (TCTC) re-consult the SWAP, specifically the North Coast Klamath section, to identify how RTP action items and SWAP conservation strategies may align. Additionally, the TCTC should not only identify possible alignments, but strive to create alignments, to assure conservation-based transportation strategies and actions throughout Trinity County. Any alignments identified or created between RTP action items and SWAP conservation strategies should be reflected in the ISND and RTP.

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 the ranges of some species ranges are already shifting. Therefore, connectivity is important to allow for wildlife to adapt, adjust, and move in response to climate change. Habitat connectivity is also necessary to reduce wildlife-vehicle collisions, which put people and wildlife at risk of injury or death.

¹ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109207&inline>


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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 to species. On September 30, 2022, Governor Gavin Newsom approved Assembly Bill 2344³ which requires Caltrans, the Department, and other appropriate agencies to establish an inventory of barriers to wildlife movement and prioritize crossing structures when building or improving roadways. The Department recommends habitat connectivity be included in the updated RTP, to ensure large natural habitat blocks are not divided, to link existing natural habitat blocks across landscapes, and to strive for improved regional connectivity for the safety of the traveling public who utilize California's transportation systems and for California's wildlife.

The Department looks forward to future project-level environmental reviews that may include components of habitat connectivity. 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>.

The Department appreciates the opportunity to comment on this Project and to assist Trinity County in conservation considerations throughout its transportation planning. If you have any questions, please contact Erika Iacona, Environmental Scientist, by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
Northern Region

cc: State Clearinghouse
state.clearinghouse@opr.ca.gov

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

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