



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Northern Region  
601 Locust Street  
Redding, CA 96001  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



November 3, 2023

Genevieve Evans, Planner  
Lassen County Transportation Commission  
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**SUBJECT: REVIEW OF THE LASSEN COUNTY 2023 REGIONAL  
TRANSPORTATION PLAN, STATE CLEARINGHOUSE NUMBER  
2023100187, LASSEN COUNTY**

Dear Genevieve Evans:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Initial Study and Negative Declaration (ISND), posted on October 5, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines<sup>1</sup>.

**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 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

<sup>1</sup>CEQA 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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seq.) authorization as provided by the applicable Fish and Game Code will be required.

### **Project Description**

The Project, as described in the ISND, is as follows:

*“The project is defined as a Regional Transportation Plan (RTP), which identifies improvements to enhance or augment regional transportation in Lassen County. [The RTP] identifies necessary improvements to provide the best possible circulation/transportation system to meet the mobility and access needs of the entire county.”*

### **Project Comments and Recommendations**

CDFW offers the comments and recommendations below to assist the Lassen County Transportation Commission (LCTC) in strengthening the revised RTP for biological resources.

#### Habitat Connectivity

Connectivity refers to the degree that organisms or natural processes can move unimpeded across landscapes – 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 climate change. Habitat connectivity is also necessary to reduce wildlife-vehicle collisions, which put both people and wildlife at risk of injury or death.

The [California Natural Diversity Database](#) (CNDDDB) identifies observations of nearly 200 state special-status species throughout Lassen County. The CNDDDB also identifies several Essential Connectivity Areas, several large Natural Landscape Blocks and several defined migratory corridors for pronghorn antelope and mule deer. The [California Fish Passage Assessment Database](#) identifies one total fish passage barrier and countless unassessed potential barriers.

On October 8, 2021, Governor Gavin Newsom approved Senate Bill 790<sup>2</sup>, 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 2344<sup>3</sup> which requires Caltrans, CDFW, and other similar agencies to establish an inventory of barriers to wildlife movement and prioritize crossing structures when building or improving

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<sup>2</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220SB790](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB790)

<sup>3</sup> [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=202120220AB2344](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB2344)

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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 fencing, and provision of roadway crossings to allow movement of wildlife.

Non-specific future projects, as referenced in the ISND, are likely to result in increased traffic volume, wider roadways, habitat fragmentation and vulnerability of wildlife to vehicle mortality. Therefore, such projects may cause significant impacts to biological resources. CDFW recommends including specifics about how Lassen County will include, analyze and plan for habitat connectivity in the final ISND and updated RTP. Including such information may ensure local wildlife corridors, migration routes and barriers are identified, mapped, preserved and/or remediated. The acknowledgment of local and migratory corridors, and barriers in county-wide transportation planning will aid Lassen County in avoiding the division of Natural Habitat Blocks and Essential Connectivity Areas across landscapes, and instead link these habitats, which is likely to improve regional connectivity for the safety of those that utilize California's transportation systems, and California's species. In doing so, CDFW strongly encourages Lassen County to plan for and incorporate wildlife connectivity structures into future projects, including but not limited to, underpasses, upsized culverts, exclusionary deer fence and/or jump-out features.

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

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

CDFW appreciates the opportunity to offer comments and recommendations that may assist the LCTC 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](mailto:R1CEQARedding@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Curt Babcock for  
Tina Bartlett, Regional Manager  
Northern Region

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