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**To:** [ahoyt@pctpa.net](mailto:ahoyt@pctpa.net)  
**Cc:** [Wildlife R2 CEQA](#); [OPR State Clearinghouse](#)  
**Subject:** CDFW's comments on the DEIR for the 2040 Placer County Regional Transportation Plan (SCH 2019060004)  
**Date:** Friday, October 11, 2019 6:21:39 PM

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## STATE CLEARINGHOUSE

Dear Mr. Hoyt:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the 2040 Placer County Regional Transportation Plan (project; RTP) [State Clearinghouse No. 2019060004]. The Department is responding to the DEIR as a Trustee Agency for fish and wildlife resources (California Fish and Game Code sections 711.7 and 1802, and the California Environmental Quality Act (CEQA) Guidelines section 15386), and as a Responsible Agency regarding any future discretionary actions (CEQA Guidelines section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code sections 2080.1 and 2081).

### **Comments and Recommendations**

Following review of the DEIR, the Department offers the comments and recommendations presented below to assist the Placer County Transportation Planning Agency (PCTPA; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources:

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Wildlife Movement

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Placer County's roads impact wildlife in a number of ways including direct mortality from vehicle strikes, habitat fragmentation, and barriers to wildlife movement (Spencer et al, 2011). As the population grows and traffic increases, and as roads are widened or otherwise updated to accommodate higher use, the impacts on wildlife tend to increase. Barriers to wildlife movement are expected to cause greater impacts as climate change impacts existing habitats and changes where animals can live. While the DEIR's Mitigation Measure BIO-5 requires individual projects to incorporate design measures to allow fish and wildlife to pass through movement corridors, individual projects identified in the RTP may have a cumulatively significant impact on wildlife movement which may not be identified when viewing individual projects separately.

In order to address potentially significant cumulative impacts and to help minimize the impacts of existing roads, the Department encourages PCTPA to prioritize building wildlife crossing structures, such as overpasses, underpasses, bridges, and large box culverts, in areas where wildlife movement is significantly impaired by roadways. Wildlife crossing structures allow wildlife to move over or under roadways, which increases habitat and genetic connectivity and reduces risk of injury caused by vehicle strikes both to wildlife and motorists.

Interstate 80 in particular poses a significant barrier to wildlife movement, and the areas between Auburn and Alta, near the Yuba Gap area, and at the ends of the Truckee River canyon have been identified as high-priority areas for wildlife crossings. Highway 49 between Auburn and Grass Valley

has also been identified as a priority area, particularly in the Bear River area.

Wildlife movement across roads can also be improved opportunistically by including crossing-friendly design elements into maintenance and repair projects. For example, existing culverts may be replaced with larger culverts with interior shelves to allow terrestrial wildlife to pass through when water is flowing through.

Useful resources for wildlife crossing design include the Department's "Transportation Planning Companion Plan" associated with the State Wildlife Action Plan (CDFW, 2016), the California Essential Habitat Connectivity Project (<https://www.wildlife.ca.gov/conservation/planning/connectivity/CEHC>), and Caltrans' "Wildlife Crossings Guidance Manual" (Caltrans, 2009).

### **Further Coordination**

The Department appreciates the opportunity to comment on the DEIR for the for the 2040 Placer County Regional Transportation Plan (State Clearinghouse No. 2019060004), and requests that the County address the Department's comments and concerns prior to circulating the final EIR. If you have any questions pertaining to these comments, please contact Gabriele Quillman at (916) 358-2955 or [gabriele.quillman@wildlife.ca.gov](mailto:gabriele.quillman@wildlife.ca.gov).

Sincerely,

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### References

Caltrans, 2009. *Wildlife Crossings Guidance Manual*. Prepared by Robert J. Meese, Fraser M. Shilling, and James F. Quinn.

CDFW, 2016. *California State Wildlife Action Plan, Transportation Planning Companion Plan*. Prepared by Blue Earth Consultants, LLC., Sacramento, CA.

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.