



August 19, 2019

Governor's Office of Planning & Research

AUG 20 2019

California Department of Transportation
Rachelle Hadley, Associate Environmental Planner, Coordinator **STATE CLEARINGHOUSE**
Caltrans District 1, North Region Environmental
1656 Union Street
Eureka, CA 95501

Subject: SCH # 2019079059, Culvert Rehab and Fish Passage Project Comment Letter to Initial Study with Proposed Negative Declaration

Dear Ms. Hadley,

Thank you for the opportunity to review and comment on the Culvert Rehab and Fish Passage Project Initial Study with Proposed Negative Declaration (ISPND) (SCH # 2019079059); simply referred to herein as the Project. As documented in the ISPND, the Project includes rehabilitation or replacement of four deteriorating culverts and improvement to fish passage through the Clarks Creek culvert on U.S. Highway 199 in Del Norte County from post mile 1.11 to 2.56.

California State Parks' North Coast Redwoods District (NCRD) is responsible for the management of the 10,430-acre Jedediah Smith Redwoods State Park (JSRSP), which is bisected at its northern end by U.S. Highway 199. JSRSP surrounds the Project areas, and contains the entire watersheds that drain to them, which consist of old growth coast redwood forest. The park is managed to preserve significant examples of the primeval coastal redwood forests and the prairies, streams, and woodlands with which they are associated for purposes of public inspiration, enjoyment, and scientific study, and to preserve all related scenic, cultural, historical, and recreational values.

Overall, NCRD appreciates the opportunities for natural resources staff to work closely with Caltrans on the development of this project. NCRD approves the measures included in the project to reduce impacts to resources. However, NCRD would like to offer the following comments and requests for clarification, which are organized below by their corresponding heading within the ISPND document:

Chapter 1. Proposed Project

Table 2. Proposed Work by Location

This table states that culverts will be skewed to avoid trees. NCRD staff worked in the field with Caltrans staff to devise methods such as this to avoid impacts to large redwood tree roots. NCRD requests detailed plans showing how culvert placement will avoid tree roots.

1.5.3 Visual Aesthetics

VA-5: Installation of willow cuttings will likely not be appropriate for the coast redwood forest habitat in which the Project occurs. In the revegetation plan, please provide location information and rationale if planting willows.

1.5.9 Threatened and Endangered Species

TS-4: States that trees would be removed between September 2 and January 31, outside of the nesting season for northern spotted owl. NCRD requests a copy of the USFWS-Caltrans Routine Maintenance Programmatic Letter of Concurrence and associated analysis that substantiates the stated Caltrans work window.

TS-5: States that between August 6 and September 15, project actions that would generate noise greater than or equal to 10 dB above ambient sound levels would observe a daily work window beginning 2 hours post-sunrise and ending 2 hours pre-sunset. NCRD requests a copy of the USFWS-Caltrans Routine Maintenance Programmatic Letter of Concurrence and associated analysis that substantiates the stated Caltrans work window.

1.5.10 Plant Species

PS-2: NCRD requests the opportunity to approve the revegetation plan to ensure adherence to the District's genetic integrity guidelines and appropriateness of species selection.

1.5.13 Sensitive Natural Communities

SNC-3: NCRD requests their natural resources staff be notified in advance, and are allowed to be present during, excavation within the Structural Root Zone (SRZ) of all trees above 2-foot diameter at breast height (DBH) or greater.

Chapter 2. CEQA Environmental Checklist

Pp 47-48 Marbled Murrelet

The ISPND states activities that generate very high levels of noise, such as guardrail installation would occur after August 6th and within daylight hour restrictions until the end of the marbled murrelet nesting season (September 15th). NCRD requests a copy of the USFWS-Caltrans Routine Maintenance Programmatic Letter of Concurrence and associated analysis that substantiates the stated Caltrans work window.

p. 49 Coho Salmon

The ISPND states this project is anticipated to result in federal and state take of coho salmon due to direct impacts from the fish relocation effort at Clarks Creek (PM 2.56). NCRD requests copies of Caltrans' Incidental Take Permit from California Department of Fish and Wildlife and Programmatic Biological Opinion from National Marine Fisheries Service, when they become available.

NCRD appreciates the opportunity to comment on the Project. Please contact Environmental Scientist, Carol Wilson, at 707-465-7772 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "V. Bjelajac".

Victor Bjelajac
District Superintendent
North Coast Redwoods District

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