



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
California State Wildlife Action Plan Program
Climate Science and Renewable Energy Branch
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



March 29th, 2016

Gabriel Corley, CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Re: Draft California Transportation Plan (CTP 2040)

Dear California Department of Transportation:

Thank you for the opportunity to provide comments on the public draft California Transportation Plan (CTP 2040).

The following comments are respectfully submitted by the California Department of Fish and Wildlife (CDFW), Climate Science and Renewable Energy Branch and relate to our desire of integrating the common goals and objectives of the California State Wildlife Action Plan 2015 Update (SWAP 2015) and the California Transportation Plan 2040 Update.

SWAP 2015 Program was pleased to find that both environmental stewardship and integration of conservation and transportation efforts are considered as top priorities under CTP 2040. To advance these concepts into actions, however, CDFW believes the CTP 2040 would benefit from the selection of performance measures under the G6 that specifically address environmental stewardship. Our comments are focusing on G6 and the associated measures in addition to providing updated references to SWAP 2015 which is now in the implementation phase (see <https://www.wildlife.ca.gov/SWAP>).

CDFW strongly supports CTP 2040's development and implementation based on a public process. We are looking forward to future coordination and collaboration opportunities to advance our shared priorities in the realm of ecosystem conservation. For questions on the comments provided under this letter, please feel free to contact Dr. Junko Hoshi at junko.hoshi@wildlife.ca.gov, or directly to me at (916) 445-3379.

Sincerely,

Armand Gonzales
Special Advisor
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Conserving California's Wildlife Since 1870

Appendix 1 and 3: Performance Measure related to G6

1. Performance Measures need to be better selected and expanded
 - a. We are pleased to find G6 and the policy addressing “Integrate Environmental Considerations in All Stages of Planning and Implementation” as well as a resource conservation policy.
 - b. The performance measures, however, are not adequately selected for those policies or strategies under the policies. In fact, we are finding that none of the strategies addressed under G6 has an adequate set of performance measures.
 - c. For example, under P2, there is only one measure and it considers agriculture land conversion to urban area. This standalone measure does not provide much information on cultural or natural resource conservation. “Enhancement” component of those resources addressed under the policy are not measurable. Similarly, PM1 and 2, the only two measures listed for G6, would not adequately provide information related to water quality or habitat fragmentation, both of which are addressed under the G6-P1-S1. For example, it makes sense to address road kill of wildlife as a measure that could be also tied into a safety and efficiency policy.
 - d. Consistent with the SWAP 2015 and the Transportation Companion Plan, whenever a road or highway is build or improved, and the road or highway occurs in a wildlife movement corridor, over-passes and under-passes should be included in the initial design. This recommendation benefits health and safety to motorist and benefits wildlife movement, both migratory and in response to climate changes.
 - e. The inadequate selection is partly due to the vast difference in the level of the details in the policy descriptions and that of the associated measures.
 - f. Suggest associating measures to each strategy instead of directly relating to the high-level policies. Table 1 under Appendix 1 would better serve if the main columns are strategies categorized by goals and policies.
 - g. Strategic Growth Council (SGC) under Integrated Regional Conservation and Development (IRCAD) are in the process of developing a regional conservation framework that includes regional conservation goals. SWAP 2015 also has a companion plan addressing transportation. Under the companion plan, the data collection and analysis (including monitoring and evaluation) is recognized as one of joint priorities for collaboration between the conservation and transportation communities. Consider integrating those efforts for the selection of those measures.
2. Appendix 3 p.9, P2-S5
 - a. This strategy addresses many big topics. Suggest separating funding issues as a separate strategy.
3. Cross-pollinate the policy, strategies and measures.

Main Document Chapter 4 Goal 6

1. P.109, Opening paragraph. After the 2nd sentence, please add a sentence describing biological impacts such as habitat loss, fragmentation, or road kill.
2. p.110, Figure 25
 - a. As described at the end of the p.109, environmental considerations should be included in all phases of a project. The Figure 25 needs to be adjusted to reflect this concept.
 - b. More specifically, feedback loops should be created in multiple stages, not only at the stage of regional vision and goals and of the monitoring. Especially environmental evaluations under "Evaluation & Prioritization of Priorities", "Development of Transportation Plan", "Development of Transportation Improvement Program" are essential to address.
 - c. Proceeding with project design without the benefit of environmental input has and will continue to result in unmitigated impacts to fish and wildlife and/or costly and time consuming redesigns once environmental review is conducted. Suggest incorporating environmental review and input early in the design process before an engineering investment has made and when changes can still be made to design and alignment.
3. P.110, SWAP
 - a. Suggest replacing the 3rd sentence "Currently under development by The California Department of Fish and Wildlife, the SWAP creates an ecologically-based framework for decision making." with the following sentences:

The California Department of Fish and Wildlife (CDFW) recently finalized SWAP 2015 (<https://www.wildlife.ca.gov/SWAP>). SWAP 2015 priorities include sustaining natural resource conservation while supporting necessary human activities such as transportation related activities. The key to achieve these seemingly conflicting priorities both from the transportation and conservation sectors, are to engage in functional working partnership. To begin the process, CDFW together with stakeholders from diverse transportation fields including Caltrans staff, prepared a framework for collaboration that is summarized in nine companion plans, one of which addresses transportation, in addition to the main document that addresses broader conservation priorities for Californian and its regions. For details, reference the public draft Transportation Planning SWAP 2015 Companion Plan (<http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=111505&inline>).

[Please note that the transportation companion plan under SWAP described above is scheduled to be finalized by summer, 2016.]

4. Articles only about Air quality, consider adding a recent joint effort of SGC ### SWAP 2015 Transportation Planning Sector Companion Plan or SGC.