



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243 - 4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



January 30, 2026

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
24580 Silver Cloud Court
Monterey, California 93940
(831) 264-5086
hadamson@ambag.org

**Subject: 2050 Metropolitan Transportation Plan (MTP) / Sustainable Communities Strategy (SCS) and 2050 Regional Transportation Plans (RTP) for San Benito, Santa Cruz, and Monterey Counties (Plan)
Draft Environmental Impact Report (DEIR)
State Clearinghouse No.: 2024010524**

Dear Heather Adamson:

The California Department of Fish and Wildlife (CDFW) received a DEIR from the Association of Monterey Bay Area Governments (AMBAG) for the Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Plan that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW 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 & G. Code, §§ 711.7, subd. (a) & 1802; Pub. 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 (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may

Conserving California's Wildlife Since 1870

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
January 30, 2026
Page 2

need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the project's stemmed from this Plan may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the project's stemmed from this Plan may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Fully Protected Species

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an Incidental Take Permit (ITP) for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code § 2081.15). Project proponents should consult with CDFW early in the project planning process.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or Federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for projects stemmed from this Plan.

PLAN DESCRIPTION SUMMARY

Proponent: Association of Monterey Bay Area Governments

Heather Adamson, Director of Planning
 Association of Monterey Bay Area Governments
 January 30, 2026
 Page 3

Objective: The Plan proposes to develop a long-range transportation plan and SCS for Monterey, San Benito, and Santa Cruz counties. The Council of San Benito County Governments (SBCOG), the Santa Cruz County Regional Transportation Commission (SCCRTC), and the Transportation Agency for Monterey County (TAMC) are the State-designated Regional Transportation Planning Agencies (RTPAs) for San Benito, Santa Cruz, and Monterey counties, respectively. Each RTPA prepares a county-level long-range RTP, which is evaluated in the DEIR. The Plan is used to guide the development of the Regional and Federal Transportation Improvement Programs, as well as other transportation programming documents and plans. The MTP outlines the region's goals and policies for meeting current and future mobility needs, providing a foundation for transportation decisions by local, regional, and State officials that are ultimately aimed at achieving a coordinated and balanced transportation system. The Plan sets forth actions, programs, and projects to address these needs consistent with adopted policies and goals. The Plan also documents the financial resources needed to implement the plan. Additionally, pursuant to SB 375, AMBAG (as the regional MTP) must prepare an SCS that demonstrates how the region will meet its greenhouse gas reduction target (6% reduction by 2035) through integrated land use, housing, and transportation planning.

Location: Monterey County, Santa Cruz County, and San Benito County

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist AMBAG in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR.

CDFW submitted a comment letter on March 14, 2024 (Attachment 1) in response to the Plan's Notice of Preparation (NOP). That letter provided species considerations for evaluation in the DEIR and provided recommendations to ensure compliance with the CESA and Fish and Game Code.

CDFW has concerns about the ability of some the proposed mitigation measures to reduce impacts to less than significant and avoid unauthorized take for several special status animal species, including the State endangered and federally listed Marbled Murrelet (*Brachyramphus marmoratus*); the State endangered and fully protected and federally endangered Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*); the State and federally threatened California tiger salamander - central California Distinct Population Segment (DPS) (*Ambystoma californiense* pop. 1); the State fully protected ringtail (*Bassariscus astutus*); the State candidate and specially protected mammal Southern California/Central Coast Evolutionary Significant Unit (ESU) Mountain lion (*Puma concolor*); the State candidate western burrowing owl (*Athene cunicularia hypugaea*); and the State species of special concern American

Heather Adamson, Director of Planning
 Association of Monterey Bay Area Governments
 January 30, 2026
 Page 4

badger (*Taxidea taxus*), Monterey dusky-footed woodrat (*Neotoma macrotis luciana*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), western red bat (*Lasiurus frantzii*), and loggerhead shrike (*Lanius ludovicianus*). CDFW is also concerned how the Plan may impact wildlife movement and habitat connectivity and has the following recommendations:

Marbled Murrelets

The DPEIR, impact BIO-1(a), currently references an outdated protocol for surveying marbled murrelets (MAMU), *Methods for Surveying Marbled Murrelets in Forests: A Revised Protocol of Land Management and Research* (Pacific Seabird Group 2003). There is updated guidance that reflects current best practices for survey methods and conservation considerations for the species. The Pacific Seabird Group's 2024 Inland Survey Protocol for Marbled Murrelets incorporates updated survey methods and design, occupancy criteria, and terminology, and utilizes the best available science for evaluating potential marbled murrelet occupancy within nesting habitat (USFWS 2024). To avoid potentially significant impacts to MAMU, CDFW recommends revising Impact BIO-1(a) to replace the outdated 2003 protocol with the most recent version, *A Revised Protocol for Surveying Marbled Murrelet in Forests* (Pacific Seabird Group 2024), available at: <https://pacificseabirdgroup.org/wp-content/uploads/2024/02/A-Revised-Protocol-for-Surveying-MAMU-in-Forests-2024.pdf>.

Western Burrowing Owl

The California Fish and Game Commission (FGC) approved western burrowing owl (BUOW) as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published these findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now a candidate under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085). The DEIR currently identifies BUOW as a species of special concern. CDFW recommends revising the DEIR language to reflect its status as a state candidate species. Additionally, should a BUOW or known BUOW den (active or inactive) be detected, either during pre-construction surveys or construction activities associated with a project, CDFW recommends that no-disturbance buffers, as outlined in the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012), be implemented prior to and during any ground-disturbing activities. CDFW also recommends that these buffers be implemented for both wintering and breeding BUOW. If a BUOW or known BUOW den (active or inactive) is detected, and the no-disturbance buffers outlined in the 2012 Staff Report on Burrowing Mitigation are not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
January 30, 2026
Page 5

Special-status Bats

The Plan area is within the range of several special-status bat species, including Townsend's big-eared bat, pallid bat, western mastiff bat, and western red bat, and the DEIR notes that implementation of the Plan could result in impacts to these species. While there are several biological resource measures provided in the DEIR to mitigate for potential significant impacts to special status animal species, there does not appear to be bat specific mitigation measures.

As special-status bats, including the species referenced above, are highly sensitive to habitat disturbance, and activities that modify roosting sites, foraging areas, or riparian vegetation may result in adverse impacts on bat populations, CDFW recommends the DEIR include a bat specific mitigation measure that incorporates the following:

Recommended Mitigation Measure 1: Bat Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment for projects tiered from this Plan to determine if the project site and immediate surrounding vicinity contain habitat suitable to support bats. Potential roosting sites include bridges, structures, large trees (particularly those with cavities or exfoliating bark), and riparian vegetation. The assessment should document all potential roosting features and foraging habitat within the project footprint.

Recommended Mitigation Measure 2: Bat Surveys

If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct daytime and evening acoustic surveys in addition to extensive visual surveys for bats and potential habitat at least 14 days prior to initiation of construction activities. Surveys should identify species present, estimated quantity, roost type, and roost status, while avoiding disturbance during surveys. CDFW should be notified within 24 hours if bats are detected.

Recommended Mitigation Measure 3: Bat Avoidance and Minimization

If bats are detected, CDFW recommends implementing avoidance measures to prevent take and minimize impacts. For tree removal, trees 24 inches DBH and greater shall be removed over two days: on the first day, limbs shall be removed in the late afternoon to encourage bats to seek other roosts during nighttime foraging, and the remainder of the tree shall be removed on the second day as late in the afternoon as feasible. Tree limbing or removal shall not occur during precipitation events, when ambient temperatures are below 4.5°C, when wind speeds exceed 11 mph, or under any other condition that may lead bats to seek refuge. If bats are injured or mortality occurs during tree removal, the qualified biologist shall immediately notify CDFW with details of the event, species recorded, and number of individuals documented.

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
January 30, 2026
Page 6

Recommended Mitigation Measure 4: Bat Mitigation and Monitoring Plan

If project activities will result in unavoidable significant impacts to bats, the qualified biologist shall prepare a bat mitigation and monitoring plan. The Plan should include an assessment of all project impacts to bats, including noise disturbance during construction; effective avoidance and minimization measures; and compensatory mitigation for permanent impacts to maternity roosts if impacted.

Wildlife Corridors and Habitat Connectivity

California wildlife is losing the ability to move and migrate as habitat conversion and built infrastructure disrupt species habitat and cut off migration corridors. SB 790 and Assembly Bill 2344 both address wildlife connectivity in California and assert authority and responsibility to CDFW and/or local and state transportation agencies to implement wildlife connectivity actions by identifying where they are needed, coordinate and implement those actions, and establish compensatory mitigation credits for actions taken.

The Plan area and adjacent lands are important for providing habitat connectivity for many wildlife species, including Santa Cruz long-toed salamander, California tiger salamander, ringtail, mountain lion, and many State species of special concern, including, but not limited to, Monterey dusky-footed woodrat, American badger, loggerhead shrike, pallid bat, and Ringtail (BIOS ds867).

CDFW recommends the DEIR incorporate the CDFW programs that can be used to promote habitat connectivity, such as Regional Conservation Investment Strategies and associated Mitigation Credit Agreements and SB 790 wildlife connectivity actions. For example, the Plan area covers existing planning areas that include analyses and measures for connectivity, including the Santa Cruz and Monterey Regional Conservation Investment Strategies (RCIS).

The primary transportation projects planned in Santa Cruz are also along Highway 1, with several projects also planned on Highway 1 and State Route (SR) 68 in Monterey County; Highway 1 currently serves as a barrier to movement for the Santa Cruz long-toed salamander. SR-68 is a known movement barrier for many species of wildlife, including California tiger salamander and mountain lion. CDFW has specifically identified several stretches of Highway 1 and SR 68 as priority wildlife movement barriers. Additionally, according to the California Fish Passage Assessment Database (BIOS ds69), a number of fish barriers for species including tidewater goby (*Eucyclogobius newberryi*) and steelhead (*Oncorhynchus mykiss*) occur along portions of Highway 1 that should also be considered for remediation during project design to address connectivity impacts from transportation infrastructure.

Implementation of the Plan could result in direct and indirect mortality, reduced reproductive success, reduced frequency of care for young resulting in reduced health

Heather Adamson, Director of Planning
 Association of Monterey Bay Area Governments
 January 30, 2026
 Page 7

or vigor of young, forcing wildlife into movement paths and areas that could increase their vulnerability to vehicle strikes and predation, and reduction in genetic exchange affecting intra-species diversity. Isolation of subpopulations limits the genetic exchange of populations and increases the risk of local extirpation. Maintaining connectivity through these linkages in the Plan's area is critical to ensure current and future wildlife populations' abilities to move and adapt to a changing climate and habitat conditions.

Mitigation Measure BIO-3 is provided to mitigate for potential impacts to wildlife connectivity and incorporates measures such as project design, maintaining connectivity in drainages, and utilizing best management practices to minimize impacts to wildlife; however, CDFW does not concur that these measures are sufficient to mitigate for potential project-related impacts to wildlife connectivity.

CDFW recommends in-depth studies on existing use of wildlife corridors within the Plan area and surrounding areas in order to evaluate the extent of future impacts of projects tiered from this Plan on wildlife connectivity and to provide a basis for infrastructure and project component redesign. Data collection methods should enable detection of species that have been found to utilize the existing movement corridors, including species mentioned above. The cumulative impacts of adjacent projects on wildlife corridors should be considered.

The DEIR should also thoroughly assess existing wildlife movement corridors and habitat connectivity throughout the listed transportation improvement projects. The DEIR should also assess opportunities for enhancement of existing corridors or creation of new corridors where they may be lacking. The DEIR should provide detailed maps of specific locations where wildlife connectivity could be impacted, such as culverts, roads, fencing, etc. Finally, the DEIR should include the results of past connectivity studies within the Plan area in the assessment and, where data are lacking.

In addition to the general DEIR recommendations above, CDFW recommends BIO-3 be modified to incorporate the following:

Recommended Mitigation Measure 5: Analysis and Monitoring of Wildlife Corridor

CDFW recommends that projects tiered from this Plan incorporate project-specific wildlife movement studies to evaluate the potential for the project to significantly impact wildlife connectivity and to guide the development of wildlife corridor mitigation measures to mitigate for connectivity impacts. For projects where wildlife corridor improvement is considered, pre-construction study results should be used to develop biologically feasible movement corridor improvements. Post-construction monitoring should also assess the use of wildlife movement corridors.

The protocol for the baseline survey, post-construction surveys, site selection criteria, and design criteria for the development of the wildlife connectivity structures

Heather Adamson, Director of Planning
 Association of Monterey Bay Area Governments
 January 30, 2026
 Page 8

should, at a minimum, follow the protocols outlined in the California Department of Transportation (Caltrans) Wildlife Crossings Design Manual (Caltrans 2009), CDFW's Transportation Planning Companion Plan associated with the State Wildlife Action Plan (CDFW 2016), and the Federal Highway Administration Wildlife Crossing Structure Handbook (FHWA 2011).

CDFW recommends that monitoring data be analyzed, summarized, and results discussed in reports that may be posted to the project webpage and submitted to CDFW and other agencies or organizations that have a duty or interest in the effectiveness of wildlife movement corridors.

Recommended Mitigation Measure 6: Infrastructure and Project Component Design

CDFW recommends that on-site features that contribute to habitat connectivity should be evaluated and implemented. Aspects of the Plan that could create physical barriers to wildlife movement, including direct or indirect Plan-related activities, should be identified and addressed in the DEIR. CDFW recommends the Plan avoid developing and encroaching onto wildlife corridors, essential connectivity blocks, critical wildlife passage areas, or potential linkage areas.

The DEIR should establish measures for wildlife-friendly designs for covered activities, including but not limited to:

- **Wildlife-friendly fencing**, including restrictions on placement of fencing at the opening to culverts. Fencing should also be designed to deter wildlife from crossing over roads and other infrastructure and to reduce wildlife-vehicle collisions during both dry and wet seasons.
- **Culvert improvements** to support passage during wet and dry years, including but not limited to maintaining culverts to be free of sediments and vegetation; terracing to allow passage of terrestrial species where space allows; upsizing to support passage of impacted species.
- **Consideration of design features** that can support wildlife movement such as minimizing lengths (entry to exit) of dedicated wildlife crossings for certain species guilds; designs (grates, shelving, terracing, etc.) that still allow light penetration; maximizing heights of crossings or adding bridges for larger species guilds; natural cover types to encourage use; bench designs to allow use of the crossings during flooding; and smaller animal escape areas within or adjacent to the dedicated wildlife crossings.
- **Scientifically defensible wildlife corridor width** should be required. The functional width of usable linkages should be described and maintained outside of the zone of influence of edge effect. In general, a corridor should be at least

Heather Adamson, Director of Planning
 Association of Monterey Bay Area Governments
 January 30, 2026
 Page 9

two kilometers (km) wide, except at unavoidable bottlenecks such as freeway crossing structures (Beier 2018). The effective corridor width is the minimum spatial dimension needed to mitigate human influence on animal movement through the corridor (Ford et al. 2020).

CDFW recommends coordination with regional CDFW and conservation engineering staff on the design of connectivity mitigation measures including, but not limited to, wildlife passage undercrossings, directional fencing to prevent animals from crossing roads to reduce wildlife-vehicle strikes, removal of accumulated sediment that may block undercrossings, removal of vegetation debris, control of invasive plant species, signage to alert drivers of wildlife crossings, and education and training on wildlife crossing minimization.

Wildlife movement corridors should continue to be monitored for wildlife passage during all Plan phases (construction, operation, reclamation, and revegetation monitoring). Upon completion of Plan-related projects, any wildlife connectivity structures should be studied for an additional 12- to 24-month period, at minimum, to determine the effectiveness of utilization by wildlife of the structures.

The recommended movement studies should be used to determine locations for design modifications that support the maximum movement and connectivity for impacted species. CDFW recommends thorough monitoring of wildlife crossings both before and after construction to assess their effectiveness. This monitoring should include the use of camera traps, track beds, and other methods.

Recommended Mitigation Measure 7: Compensatory Mitigation – Local Area Movement Corridors

On- or off-site compensatory mitigation should be implemented to completely offset unavoidable impacts if infrastructure redesigns and other measures to avoid significant impacts to existing wildlife corridors within the Plan area do not fully avoid impacts to wildlife corridors. The PEIR should include an analysis of beneficial and feasible wildlife movement corridors and/or crossings at off-site locations that could be improved or constructed to enhance wildlife connectivity.

The Plan should evaluate the development of advanced mitigation credits to support mitigation for future projects and to address connectivity impacts. As mentioned above, Fish and Game Code Section 1955 et seq. (Senate Bill 790) allows the Department of Fish and Wildlife to approve compensatory mitigation credits for actions that improve wildlife connectivity. These actions should lead to measurable improvements in aquatic or terrestrial habitat connectivity, wildlife migration, recolonization, and breeding opportunities, especially where these are hindered by infrastructure or habitat fragmentation, and may include building road overpasses or underpasses.

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
January 30, 2026
Page 10

The Plan may be able to provide additional value for wildlife connectivity depending on its design. Additionally, the Plan could seek out the development of Mitigation Credit Agreements as part of Regional Conservation Investment Strategy. For example, the East Bay Regional Conservation Investment Strategy could serve as advanced mitigation and can be used to create credits from excess mitigation generated by future projects in Santa Cruz County.

Editorial Comments and/or Suggestions

Lake and Streambed Alteration

Reasonably foreseeable future projects tiered from the DEIR may be subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602. Please note that project activities occurring within the bed, bank, channel, or floodplain of a stream may be subject to 1602.

CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral, intermittent, or episodic, as well as those that are perennial. CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement; therefore, if the DPEIR approved for the project does not adequately describe the project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSA Agreement issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593 or R4LSA@wildlife.ca.gov.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to the CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
January 30, 2026
Page 11

FILING FEES

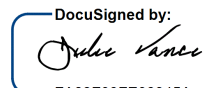
The Plan, as proposed, would have an impact on fish and/or wildlife, and an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Plan approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the AMBAG in identifying and mitigating Plan impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>)

A Mitigation and Monitoring Program (MMRP) (Attachment 2) is included to assist the County with incorporating the recommended mitigation measures provided above. If you have any questions regarding this letter or further coordination, please contact Evelyn Barajas-Perez, Environmental Scientist, at the address provided on this letterhead, by telephone at (805) 503-5738 or evelyn.barajas-perez@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

Attachments

Attachment 1 - CDFW March 2024 Letter

Attachment 2 - MMRP

ec: State Clearinghouse
Land Use and Climate Innovation
State.Clearinghouse@lci.ca.gov

Heather Adamson, Director of Planning
Association of Monterey Bay Area Governments
January 30, 2026
Page 12

References:

Beier, P. 2018. A rule of thumb for widths of conservation corridors. *Conservation Biology* 33 (4):976-978
California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. California Department of Fish and Game, Sacramento, California, USA.

California Department of Fish and Wildlife (CDFW). 2016. California state wildlife action plan, transportation planning companion plan. Prepared by Blue Earth Consultants, LLC., Sacramento, California, USA.

California Department of Transportation (Caltrans). 2009. Wildlife crossings design manual. California Department of Transportation, Sacramento, California, USA.

Federal Highway Administration. 2011. Wildlife crossing structure handbook: Design and Evaluation in North America.

Ford, A. , E. Sunter, C. Fauvelle, J. Bradshaw, B. Ford, J. Hutchen, N. Phillipow, and K. Teichman. 2020. Effective corridor width: linking the spatial ecology of wildlife with land use policy. *European Journal of Wildlife Research* 66:69.

Pacific Seabird Group. 2003. Methods for surveying Marbled Murrelet in forests: A revised protocol for land management and research. Pacific Seabird Group Technical Publication Number 2.

Pacific Seabird Group. 2024. A revised protocol for surveying Marbled Murrelet in forests. Pacific Seabird Group Technical Publication Number 6. [A-Revised-Protocol-for-Surveying-MAMU-in-Forests-2024.pdf](#).



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



March 14, 2024

Heather Adamson
Association of Monterey Bay Area Governments (AMBAG)
24580 Silver Cloud Court
Monterey, CA 93940
hadamson@ambag.org
(831) 883-3750

**Subject: 2050 Metropolitan Transportation Plan/Sustainable Communities Strategy and 2050 Regional Transportation Plans for San Benito, Santa Cruz, and Monterey Counties (Project).
Notice of Preparation (NOP)
SCH No.: 2024010524**

Dear Heather Adamson:

The California Department of Fish and Wildlife (CDFW) received a NOP from the Association of Monterey Bay Area Governments (AMBAG) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. While the comment period may have ended, CDFW respectfully requests that the Association of Monterey Bay Area Governments still consider our comments.

¹ 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.

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 2

CDFW 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 & G. Code, §§ 711.7, subd. (a) & 1802; Pub. 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 (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). 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 & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 3

Additionally, specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process if an incidental take permit may be pursued for the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: Association of Monterey Bay Area Governments (AMBAG)

Objective: As the metropolitan planning organization for the tri-county region of Monterey, San Benito, and Santa Cruz counties, AMBAG is charged with developing a 2050 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The 2050 MTP/SCS is both a long-range transportation plan and Sustainable Communities Strategy for Monterey, San Benito, and Santa Cruz counties. The Council of San Benito County Governments (SBCOG), the Santa Cruz County Regional Transportation Commission (SCCRTC), and the Transportation Agency for Monterey County (TAMC) are the State-designated Regional Transportation Planning Agencies (RTPAs) for San Benito, Santa Cruz, and Monterey counties, respectively. Each RTPA prepares a county-level long-range Regional Transportation Plan (RTP), which will be evaluated in the forthcoming Programmatic Environmental Impact Report (PEIR). The 2050 MTP/SCS is used to guide the development of the Regional and Federal Transportation Improvement Programs, as well as other transportation programming documents and plans. The MTP outlines the region's goals and policies for meeting current and future mobility needs, providing a foundation for transportation decisions by local, regional, and State officials that are ultimately aimed at achieving a coordinated and balanced transportation system. The 2050 MTP/SCS sets forth actions, programs, and projects to address these needs consistent with adopted policies and goals. The 2050 MTP/SCS also documents the financial resources needed to implement the plan. Additionally, pursuant to SB 375, AMBAG (as the regional MTP) must prepare an SCS that demonstrates how the region will meet its greenhouse gas reduction target (6% reduction by 2035) through integrated land use, housing, and transportation planning.

Location: Monterey County, Santa Cruz County, and San Benito County

COMMENTS AND RECOMMENDATIONS

The NOP indicates that the Environmental Impact Report (EIR) for this Project will be a PEIR. Per project information, the draft PEIR will be characterized as one large project and acts as the first tier of environmental review.

CDFW is unable to provide substantive comments due to the limited Project information provided to us. Many special-status plant and animal species in the proposed Project

Heather Adamson
 Association of Monterey Bay Area Governments
 March 14, 2024
 Page 4

area have been reported to the California Natural Diversity Database (CNDDDB) (CDFW 2024). The following species, organized by potential for occurrence within Monterey, Santa Cruz, and San Benito Counties, should be considered as part of the PEIR that will be drafted for this Project:

Monterey County

The federally endangered (FE) tidewater goby (*Eucyclogobius newberryi*); federally threatened (FT) steelhead - south-central California coast DPS (*Oncorhynchus mykiss irideus*); Fully Protected (FP), State endangered (SE) and FE California condor (*Gymnogyps californianus*) and Santa Cruz long-toed salamander (*Ambystoma macrodactylum croceum*); SE and FE coastal dunes milk-vetch (*Astragalus tener* var. *titi*), Hickman's cinquefoil (*Potentilla hickmanii*), Monterey clover (*Trifolium trichocalyx*), and California Ridgway's rail (*Rallus obsoletus obsoletus*), least bell's vireo (*Vireo bellii pusillus*), Menzies' wallflower (*Erysimum menziesii*), Tidestrom's lupine (*Lupinus tidestromii*), and foothill yellow-legged frog - south coast DPS (*Rana boylei*); SE and FT foothill yellow-legged frog-central coast DPS and beach layia (*Layia carnosa*); SE seaside bird's beak (*Cordylanthus rigidus* ssp. *littoralis*); SE and fully protected (FP) bald eagle (*Haliaeetus leucocephalus*); SE Santa Lucia mint (*Pogogyne clareana*); State rare (SR) adobe sanicle (*Sanicula maritima*) and Pismo clarkia (*Clarkia speciosa* ssp. *immaculata*); State Candidate endangered (SCE) Crotch's bumble bee (*Bombus crotchii*) and western bumble bee (*Bombus occidentalis*); State threatened (ST) and FE San Joaquin kit fox (*Vulpes macrotis mutica*) and Monterey gilia (*Gilia tenuiflora*); ST and FT California tiger salamander - central California DPS (*Ambystoma californiense*); FP and ST California black rail (*Laterallus jamaicensis coturniculus*); ST bank swallow (*Riparia riparia*), Swainson's hawk (*Buteo swainsoni*), and tricolored blackbird (*Agelaius tricolor*); federally proposed endangered (FPE) and ST longfin smelt (*Spirinchus thaleichthys*); FP and FT southern sea otter (*Enhydra lutris nereis*); FP golden eagle (*Aquila chrysaetos*), northern elephant seal (*Mirounga angustirostris*), and white-tailed kite (*Elanus leucurus*); State species of special concern (SSC) and FE arroyo toad (*Anaxyrus californicus*); FT and SSC California red-legged frog (*Rana draytonii*) and western snowy plover (*Charadrius nivosus nivosus*); federally proposed threatened (FPT) and SSC western spadefoot (*Spea hammondi*) and western pond turtle (*Emys marmorata*); and the SSC American badger (*Taxidea taxus*), yellow-breasted chat (*Icteria virens*), burrowing owl (*Athene cunicularia*), black swift (*Cypseloides niger*), coast horned lizard (*Phrynosoma blainvillii*), coast range newt (*Taricha torosa*), Monterey dusky-footed woodrat (*Neotoma macrotis luciana*), Monterey hitch (*Lavinia exilicauda harengus*), northern California legless lizard (*Anniella pulchra*), northern harrier (*Circus hudsonius*), Pacific lamprey (*Entosphenus tridentatus*), pallid bat (*Antrozous pallidus*), purple martin (*Progne subis*), San Joaquin coachwhip (*Masticophis flagellum ruddocki*), Salinas pocket mouse (*Perognathus inornatus psammophilus*), southern coastal roach (*Hesperoleucus venustus subditus*),

Heather Adamson
 Association of Monterey Bay Area Governments
 March 14, 2024
 Page 5

Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), yellow warbler (*Setophaga petechia*), loggerhead shrike (*Lanius ludovicianus*), grasshopper sparrow (*Ammodramus savannarum*), short-eared owl (*Asio flammeus*), olive-sided flycatcher (*Contopus cooperi*), willow flycatcher (*Empidonax traillii*), and Monterey shrew (*Sorex ornatus salarii*).

San Benito County

The FT steelhead - south-central California coast DPS; FP, SE and FE blunt-nosed leopard lizard (*Gambelia sila*) and California condor; SE and FE giant kangaroo rat (*Dipodomys ingens*) and least bell's vireo; SE and FT western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) and foothill yellow-legged frog - central coast; SE seaside bird's-beak; SCE Crotch's bumble bee and western bumble bee; ST and FE San Joaquin kit fox; ST and FT California tiger salamander - central California DPS; ST bank swallow, Nelson's (*San Joaquin*) antelope squirrel (*Ammospermophilus nelson*), Swainson's hawk, and tricolored blackbird; SSC and FT California red-legged frog; the FPT and SSC western pond turtle and western spadefoot toad; and SSC American badger, burrowing owl, California glossy snake (*Arizona elegans occidentalis*), coast horned lizard, coast range newt, long-eared owl (*Asio otus*), Monterey dusky-footed woodrat, mountain plover (*Charadrius montanus*), northern California legless lizard, northern harrier, pallid bat, Salinas pocket mouse, San Joaquin coachwhip, short-eared owl, Townsend's big-eared bat, Tulare grasshopper mouse (*Onychomys torridus tularensis*), short-nosed kangaroo rat (*Dipodomys nitratoides brevinasus*), two-striped gartersnake (*Thamnophis hammondi*), western mastiff bat, western red bat (*Lasiurus frantzii*), and yellow-breasted chat (*Icteria virens*).

Santa Cruz County

The FE and SE coho salmon-central California coast ESU (*Oncorhynchus kisutch* pop. 4), Santa Cruz wallflower (*Erysimum teretifolium*), Scotts Valley polygonum (*Polygonum hickmanii*), and white-rayed pentachaeta (*Pentachaeta bellidiflora*); FP, SE, and FE Santa Cruz long-toed salamander and California condor; FP and SE bald eagle; FP golden eagle and white-tailed kite; ST and FP California black rail; FP and FT southern sea otter; SE Beldings savannah sparrow (*Passerculus sandwichensis belding*); SE and FT Santa Cruz cypress (*Hesperocyparis abramsiana* var. *abramsiana*), Santa Cruz tarplant (*Holocarpha macradenia*), and marbled murrelet (*Brachyramphus marmoratus*); SE San Francisco popcornflower (*Plagiobothrys diffusus*) and Humboldt County milk-vetch (*Astragalus agnicidus*); SR Dudley's lousewort (*Pedicularis dudleyi*); ST and FE Monterey gilia; ST and FT California tiger salamander; ST bank swallow and tricolored blackbird; SCE Crotch's bumble bee and western bumble bee; FT and SSC California red-legged frog and western snowy plover; FPT and SSC western pond turtle; and SSC California giant salamander (*Dicamptodon ensatus*), Santa Cruz black salamander (*Aneides niger*), Cassin's auklet (*Ptychoramphus aleuticus*), Vaux's swift (*Chaetura vauxi*), black swift, mountain plover, purple martin, yellow-breasted chat, loggerhead

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 6

shrike, saltmarsh common yellowthroat (*Geothlypis sinuosa*), yellow warbler, grasshopper sparrow, Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*), yellow rail (*Coturnicops noveboracensis*), Northern harrier, short-eared owl, long-eared owl, burrowing owl, olive-sided flycatcher, Monterey hitch, Pacific lamprey, San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), American badger, Monterey shrew, pallid bat, Townsends big-eared bat, western red bat, northern California legless lizard, and coast horned lizard.

Botanical Surveys

As this is a metropolitan transportation plan, additional projects may be tiered from this Project. CDFW recommends that the Project PEIR include a measure requiring each project that is tiered under the parent project to assess the subsequent project site(s) for suitable habitat for special-status plants and conduct botanical surveys.

If a project contains suitable habitat for special-status species, the project area should be surveyed by a qualified botanist for any possible special-status plants following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities"

(<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>) as part of the biological technical studies completed in support of the CEQA documents tiered from this Plan. CDFW recommends that the plant surveys be floristic and, if necessary, utilize a known reference site for any special status plants in order to provide a high level of confidence in the effort and results.

If a special status plant is found, CDFW recommends that the special status plant species be avoided whenever possible by delineating and observing a no disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species. If a State or federally listed plant species is identified during botanical surveys, it is recommended that consultation with CDFW and/or the USFWS be conducted to determine permitting needs.

California Endangered Species Act

Reasonably foreseeable future projects tiered from the Project PEIR may be subject to CDFW's regulatory authority pursuant to CESA. In the event that species listed under CESA are detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid "take," or if avoidance is not feasible, to acquire a State Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b), prior to any ground disturbing activities. In addition, CDFW advises that

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 7

mitigation measures for the CESA listed species be fully addressed in the CEQA document prepared for any future project tiered from the Project PEIR.

CDFW therefore recommends that the Project PEIR include information related to these requirements and advises that projects tiered from the Project PEIR retain a qualified biologist to determine if potential impacts to CESA listed species may require the need to obtain a 2081 ITP.

Nesting birds

CDFW recommends that all projects tiered from the Project PEIR occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February 15 through September 15), each future project applicant is responsible for ensuring that implementation of their project does not result in a violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

To evaluate future Project-related impacts on nesting birds, CDFW recommends that a qualified biologist conduct an assessment of nesting habitat during biological surveys in support of each project's CEQA document, and then conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around each future project site to identify nests and determine their status. A sufficient area means any area potentially affected by a project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from each future project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 8

support any variance from these buffers and notify CDFW in advance of implementing a variance.

Cumulative Impacts

Given that this Project is serving primarily as a planning tool and that future project-level CEQA documents are expected to be tiered from it, CDFW recommends that a cumulative impact analysis be conducted for all potential biological resources that will either be significantly or potentially significantly impacted by implementation of the Project including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the any future project, even if those impacts are expected to be relatively small (i.e. less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Lake and Streambed Alteration

Reasonably foreseeable future projects tiered from the Project PEIR may be subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires project proponents to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial in nature. For additional information on notification requirements, please contact our staff in the LSA Program at (559) 243-4593, or R4LSA@wildlife.ca.gov.

CDFW therefore recommends that the Project PEIR include information related to these requirements of Fish and Game code and advise that projects tiered from the Project retain a qualified biologist to determine if potential impacts to streams may require the need to obtain a 1600 LSAA.

Federally Listed Species

CDFW recommends consulting with the USFWS on potential impacts to federally listed species. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 9

essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS to comply with FESA is advised well in advance of any ground disturbing activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address:

CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

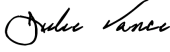
FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Conclusion

CDFW is available to meet with you ahead of the Project PEIR preparation to discuss potential impacts and possible mitigation measures, including site specific impacts and mitigation measures, for some or all of the resources that may be analyzed in the PEIR. If you have questions regarding this letter, please contact Kelley Nelson, Environmental Scientist, at (559) 580-3194 or by email at kelley.nelson@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
R4, Central Region
Regional Manager

DocuSigned by:

B77E9A6211EF486...

Erin Chappell
R3, Bay Delta Region
Regional Manager

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 10

ec: Patricia Cole, USFWS
patricia_cole@fws.gov

CDFW LSA/1600
R4LSA@wildlife.ca.gov

State Clearinghouse
Governor's Office of Planning and Research
State.clearinghouse@opr.ca.gov

Heather Adamson
Association of Monterey Bay Area Governments
March 14, 2024
Page 11

LITERATURE CITED

California Department of Fish and Wildlife. 2024. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed February 22, 2024.

Attachment 2

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM
(MMRP)**

**PROJECT: Metropolitan Transportation Plan/Sustainable
Communities Strategy and 2050 Regional
Transportation Plans for San Benito, Santa Cruz, and**

State Clearinghouse No.: 2024010524

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Special Status Bats	
Recommended Mitigation Measure 1: Bat Habitat Assessment	
Recommended Mitigation Measure 2: Bat Surveys	
Recommended Mitigation Measure 4: Bat Mitigation and Monitoring Plan	
Wildlife Corridors and Habitat Connectivity	
Recommended Mitigation Measure 5: Analysis and Monitoring of Wildlife Corridor	
Recommended Mitigation Measure 6: Infrastructure and Project Component Design	
Recommended Mitigation Measure 7: Compensatory Mitigation – Local Area Movement Corridors	
<i>During Construction</i>	
Special Status Bats	
Recommended Mitigation Measure 3: Bat Avoidance and Minimization	