

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE



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July 30, 2026

Steven Ingoldsby, Senior Regional Planner
Tulare County Association of Governments
210 North Church Street, Suite B
Visalia, California 93291
(559) 623-0450

**Subject: 2026 Regional Transportation Plan and Sustainable Communities
Strategy (Plan)
Draft Programmatic Environmental Impact Report (DPEIR)
State Clearinghouse No. 2025050379**

Dear Steven Ingoldsby:

The California Department of Fish and Wildlife (CDFW) received a DPEIR from the Tulare County Association of Governments (TCAG) for the above-referenced Plan 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 Plan that may affect California fish and wildlife. Likewise, CDFW appreciates 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

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.

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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, future projects tiered from the 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 a future project 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 may be required.

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).

Additionally, 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 if an ITP may be pursued for projects tiered from the Plan.

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 nests, and eggs 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,

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R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Plan.

PLAN DESCRIPTION SUMMARY

Proponent: Tulare County Association of Governments (TCAG)

Objective: The Plan proposes updating the current Regional Transportation Plan and Sustainable Communities Strategy. The Plan identifies specific strategies, policies, and actions, including a list of programmed and planned transportation projects that would be implemented in order to meet current and future transportation needs of the region.

Location: The Plan includes all of Tulare County, including the eight incorporated cities, unincorporated communities, and the Tule River Reservation.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist TCAG 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 Final Programmatic Environmental Impact Report (FPEIR).

CDFW previously commented on the Notice of Preparation (NOP) for the DPEIR in a letter dated June 20, 2025 (Attachment 1). The letter provided recommendations to identify and mitigate the Plan's significant or potentially significant direct and indirect impacts on biological resources. Based on a review of the DPEIR, CDFW has the following comments and/or recommendations pertaining to special-status plant and animal species, streams, wildlife connectivity, alternative analyses, and cumulative impacts.

Special-Status Species

The DPEIR provides mitigation measures BIO-1(a) through BIO-1(i) to mitigate for potentially significant impacts to special-status species and includes measures for biological resource assessments, focused surveys, avoidance, minimization, and mitigation. CDFW has concerns about the ability of some of the proposed measures to ensure that project activities reduce potential impacts to less than significant. For example, mitigation measure BIO-1(d) does not specify that State candidate species will be considered during biological resource assessments and surveys. As such, CDFW recommends modifying BIO-1(d) to specify that State candidate species will be considered during biological resource assessments and surveys. CDFW also recommends modifying BIO-1(c) and BIO-1(e) to specify that if State-listed or candidate species 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

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an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), prior to any vegetation- or ground-disturbing activities.

Mitigation measure BIO-1(e) states that temporary impact areas would be restored to pre-project conditions, and compensatory mitigation would be provided for permanent impacts to State-listed or candidate species habitat. Please be advised that compensatory mitigation may also be necessary to fully mitigate for temporary impacts to State-listed or candidate species habitat as part of acquiring CESA take authorization, pursuant to Fish and Game Code section 2081 subdivision (b).

Mitigation measure BIO-1(f) requires pre-construction surveys for State-listed or candidate species prior to the start of construction activities. CDFW recommends modifying BIO-1(f) to state that pre-construction surveys for these species shall be conducted prior to the start of construction activities, including staging and mobilization, and that surveys shall include staging and mobilization areas.

Mitigation measure BIO-1(g) provides avoidance and minimization measures for non-listed and non-candidate special-status species. CDFW has concerns about the ability of BIO-1(g) to ensure projects tiered from the Plan reduce potential impacts to less than significant for species including but not limited to: American badger (*Taxidea taxus*); Tulare grasshopper mouse (*Onychomys torridus tularensis*); coast horned lizard (*Phrynosoma blainvillii*); northern California legless lizard (*Anniella pulchra*); northwestern pond turtle (*Actinemys marmorata*); and San Joaquin coachwhip (*Masticophis flagellum ruddocki*). As such, CDFW recommends revising BIO-1(g) to incorporate the following:

Recommended Mitigation Measure 1: Pre-construction Surveys for Special-Status Species

If suitable habitat for special-status species is identified, CDFW recommends that a qualified biologist conduct focused surveys for special-status species and their requisite habitat features no more than 14 days prior to the start of Project Activities.

Recommended Mitigation Measure 2: Special-Status Species Avoidance, Minimization, and Mitigation

Avoidance whenever possible is encouraged via delineation and observance of a minimum 50-foot no-disturbance buffer around special-status species and their associated burrows and habitat areas. CDFW also recommends that if special-status species are observed, project activities in their immediate vicinity shall cease, allowing individuals to leave the project site on their own accord. Consultation with CDFW is also recommended for further project-specific guidance on avoidance, minimization, and mitigation measures.

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Western Spadefoot

The DPEIR states that western spadefoot (*Spea hammondi*) (WESP) is listed as a State species of special concern and has the potential to occur within the Plan area. Please note that on September 24, 2025, the California Fish and Game Commission (FGC) received a petition to list the northern population of WESP as threatened and the southern population of WESP as endangered under CESA. At the FGC meeting on April 16, 2026, CDFW presented its determination that the petition provided sufficient scientific information that the petitioned action to list WESP under CESA may be warranted; however, the FGC deferred its decision on WESP candidacy until August 2026. If WESP becomes a candidate for listing or ultimately becomes listed as threatened or endangered pursuant to CESA, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), would be necessary to comply with CESA if full avoidance of WESP cannot be achieved.

Special-Status Plants

Mitigation measure BIO-1(c) requires implementation of special-status plant avoidance, minimization, and mitigation measures. As stated above, CDFW concurs with BIO-1(c) but recommends modifying this measure to specify that special-status plant species include plants designated as State candidate species as they receive the same legal protections afforded to a State endangered or threatened species.

The DPEIR states that special-status plant surveys shall not be conducted earlier than one year before construction commences. While CDFW encourages that special-status plant surveys occur during the appropriate survey season prior to the initiation of project activities, please note that adverse conditions from yearly weather patterns may prevent botanical field surveyors from determining the presence of, or accurately identifying, some special-status plants in a given year. Disease, drought, predation, fire, herbivory, or other disturbance may also preclude presence or identification of special-status plants in any given year. As such, CDFW recommends these types of conditions be considered to determine the appropriate number of surveys and survey seasons to adequately detect special-status plants and mitigate for potential significant impacts.

Additionally, CDFW recommends adjusting the 30-foot avoidance buffer in BIO-1(c) to a minimum of 50 feet from the outer edge of the plant population(s) and their habitat type(s). CDFW also recommends modifying BIO-1(c) to state that if buffers cannot be maintained, consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plants and/or how to implement the project to avoid take. CDFW also recommends incorporating the following measure into the DPEIR:

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Recommended Mitigation Measure 3: Special-Status Plant Take Authorization

If State endangered, threatened, or rare plants are identified during special-status plant surveys and take cannot be avoided, then to ensure compliance with CESA and the Native Plant Protection Act (NPPA), consultation with CDFW for acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) and/or California Code of Regulations, Title 14, section 786.9, subdivision (b), is necessary to comply with CESA and the NPPA.

Wildlife Corridors and Habitat Connectivity

California wildlife is increasingly losing the ability to move and migrate as habitat conversion and built infrastructure disrupts species habitat and restricts migration corridors. Senate Bill (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 and wildlife movement for many species of wildlife and contain habitat linkages that allow species to disperse, migrate, and maintain genetic exchange with neighboring populations. Maintaining these connections is essential for both the immediate and long-term persistence of wildlife, particularly as species respond to environmental stressors such as climate change and ongoing habitat degradation. Disruption or loss of these linkages could lead to direct and indirect wildlife mortality, reduced reproductive success, diminished juvenile survival due to interrupted parental care, and increased exposure to vehicle collisions and predation. Additionally, the isolation of wildlife subpopulations threatens intra-species diversity and increases the likelihood of local extirpation, making it imperative that the Plan preserve and enhance these ecological pathways. As such, CDFW recommends the following:

Analysis and Monitoring of Wildlife Corridor

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 the 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.

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CDFW concurs with mitigation measure BIO-3(a) of the DPEIR, which requires project-specific wildlife movement assessments prior to project design approvals to evaluate connectivity constraints and identify opportunities to maintain or enhance wildlife movement. In addition, CDFW recommends that these wildlife movement assessments include detailed mapping of specific locations where wildlife movement could be affected and incorporate all available past connectivity studies in their respective analyses. In addition, CDFW recommends modifying BIO-3(a) to incorporate the following:

Recommended Mitigation Measure 4: Analysis and Monitoring of Wildlife Corridor

For projects where wildlife corridor improvements are 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 pre-construction surveys, post-construction surveys, site selection criteria, and design criteria for the development of the wildlife connectivity structures 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.

Infrastructure and Project Component Design

Mitigation measure BIO-3(a) of the DPEIR requires that projects tiered from the Plan be designed to minimize impacts to wildlife movement by prohibiting fencing at the openings of culverts, undercrossings, or other wildlife passage structures, and requiring that wildlife-friendly fencing be designed with intermittent openings along the bottom of the fence, or a contiguous gap between the ground and the bottom of the fence. CDFW concurs with incorporating design features such as wildlife-friendly fencing, when appropriate, to maintain or enhance wildlife connectivity but does not concur with allowing the use of intermittent openings along the bottom of the fence in lieu of a contiguous gap. The use of intermittent openings would increase the potential for predation of fleeing prey species by funneling them into confined routes and making them more susceptible to

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becoming trapped or disoriented. CDFW recommends modifying BIO-3(a) to discourage intermittent openings along the bottom of wildlife-friendly fencing in lieu of a contiguous gap. CDFW also recommends that projects tiered from the Plan evaluate the impacts of fencing on wildlife connectivity and design project fencing to reduce wildlife-vehicle strikes during both dry and wet seasons.

Furthermore, CDFW recommends modifying BIO-3(a) to incorporate the following considerations during project design:

Recommended Mitigation Measure 5: Infrastructure and Project Component Design

CDFW recommends that on-site features that contribute to habitat connectivity be evaluated and implemented. CDFW also recommends that the projects tiered from the Plan avoid developing and encroaching onto wildlife corridors, essential connectivity blocks, critical wildlife passage areas, or potential linkage areas.

CDFW recommends the following considerations be incorporated as appropriate during project design:

- **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; and 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 facilitate illumination from sunlight; 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 2 kilometers wide, except at unavoidable bottlenecks such as freeway crossing structures (Beier 2018). The effective corridor width is the minimum spatial dimension needed to

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mitigate human influence on animal movement through the corridor (Ford et al. 2020).

For projects that incorporate wildlife connectivity design measures, CDFW recommends coordination with regional CDFW and conservation engineering staff on structure design 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.

When structures to facilitate or enhance wildlife movement are installed, they should continue to be monitored for wildlife passage during all project phases (construction, operation, reclamation, and revegetation monitoring). Upon completion of the project, 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. In addition, 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.

Compensatory Mitigation – Local Area Movement Corridors

Mitigation Measure BIO-3(a) of the DPEIR states that when on-site design measures cannot fully reduce impacts, compensation shall be considered as a mitigation option, including but not limited to participation in mechanisms authorized under SB 790, to reduce unavoidable connectivity impacts at a landscape scale. The DPEIR 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. (SB 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.

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CDFW recommends modifying BIO-3(a) to incorporate the following:

**Recommended Mitigation Measure 6: 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.

Editorial Comments and/or Suggestions

Significant and Unavoidable Impacts: The DPEIR determined that implementation of the Plan would result in significant and unavoidable impacts to special-status species, sensitive habitats, and wildlife movement. Therefore, it is assumed that future projects tiered from the DPEIR could have the potential for similar biological resource impacts. As such, CDFW recommends that future projects tiered from the DPEIR clearly state their biological resource impacts and provide a robust biological resource and cumulative impact analysis to support the conclusions drawn in the project's CEQA document.

Cumulative Impacts: Currently, the DPEIR has a very broad analysis of cumulative impacts to biological resources and does not adequately evaluate impacts to specific resources. As such, the conclusions reached in the cumulative impacts analysis are not supported by substantial evidence, and the analysis lacks sufficient rigor and transparency to adequately develop reasonable and feasible measures to reduce harm. This is especially concerning given the DPEIR's finding that cumulative impacts on biological resources would be significant and cumulatively considerable. To address this, CDFW recommends that the DPEIR conduct a cumulative impact analysis for all specific biological resources that would either be significantly or potentially significantly impacted by implementation of the Plan, 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 would be impacted by future projects tiered from the Plan, even if those impacts are 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 projects. An appropriate resource study area should be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

CEQA Alternatives: It is unclear whether the information and results obtained from the DPEIR's cumulative impact analysis were used to develop and modify the Plan's

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alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. For example, each of the potential alternatives explored in the DPEIR, except for the “no project” alternative, included all of the Plan’s proposed transportation projects without any apparent changes. Based on a review of the alternatives that were considered but rejected as infeasible, it is unclear whether alternatives such as alternate routes or configurations were considered. Please note that when efforts to avoid and minimize impacts have been exhausted for projects tiered from the Plan, remaining impacts to sensitive biological resources may need to be mitigated to reduce impacts to a less than significant level, if feasible.

Lake and Streambed Alteration: Reasonably foreseeable future projects tiered from the Plan 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 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.

CDFW therefore recommends that the DPEIR include information related to these requirements of Fish and Game code and advise that projects tiered from the Plan retain a qualified biologist to determine if potential impacts to streams may require the need to notify pursuant to Fish and Game Code section 1602.

Nesting Birds: CDFW encourages that vegetation- or ground-disturbing activities occur during the bird non-nesting season; however, if vegetation- or ground-disturbing activities must occur during the nesting season (February 1 through September 15), the project applicant is responsible for ensuring that implementation of the project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

Mitigation Measure BIO-1(h) requires a qualified biologist to establish an appropriate avoidance buffer around active nests based on the species biology and the current and anticipated disturbance levels occurring in the vicinity of the nest. CDFW concurs with establishing avoidance buffers but, in addition, recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from project activities. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance measures. If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends implementing a minimum 250-foot avoidance buffer around active nests of non-listed

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bird species and a minimum 500-foot avoidance 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 the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these avoidance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the work area would be concealed from a nest site by topography. Prior to implementing a variance from these avoidance buffers, CDFW recommends that a qualified biologist evaluate the site-specific circumstances, provide a biological or ecological justification to support a variance, if possible, and notify CDFW.

California Natural Diversity Database (CNDDDB): Please note that the CNDDDB is populated by voluntary submission records of species detections. As a result, species may be present in locations not depicted in the CNDDDB, but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDDB does not mean a species is not present. All projects tiered from the Plan should adequately assess any potential project-related impacts to biological resources by ensuring biological surveys are conducted by a qualified biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology as warranted in order to determine whether or not any special-status species are present at or near the project area.

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 the Plan or tiered project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link: <https://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>.

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FILING FEES

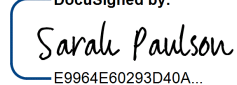
The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing 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 appreciates the opportunity to comment on the DPEIR to assist TCAG in identifying and mitigating the Plan's 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>).

Please see the enclosed, Attachment 2, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. If you have any questions regarding this letter or further coordination, please contact Stephanie Manzo, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 578-0409, or by electronic mail at stephanie.manzo@wildlife.ca.gov.

Sincerely,

DocuSigned by:

E9964E60293D40A...

For Julie A. Vance
Regional Manager

Attachment 1: CDFW NOP Comment Letter June 20, 2025
Attachment 2: Mitigation and Monitoring and Reporting Program

cc: State Clearinghouse
Governor's Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

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Attachment 1



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June 20, 2025

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**Subject: 2026 Tulare County Association of Governments (TCAG) Regional
Transportation Plan & Sustainable Communities Strategy (Plan)
Notice of Preparation (NOP)
SCH No.: 2025050379**

Dear Steve Ingoldsby:

The California Department of Fish and Wildlife (CDFW) received a NOP to prepare a Programmatic Environmental Impact Report (PEIR) from the TCAG, as Lead Agency, for the above referenced Plan 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 Plan that may affect California fish and wildlife. Likewise, CDFW appreciates 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.

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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, projects tiered 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 a 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.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

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).

Additionally, 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 (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the project planning process if an ITP may be pursued for a project tiered from this Plan.

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 the Plan.

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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).

PLAN DESCRIPTION SUMMARY

Proponent: Tulare County Association of Governments (TCAG)

Objective: The Plan updates the 2022 RTP/SCS. The Plan would be used to allocate federal and State funding for regional transportation projects. The Plan would also identify policies and strategies to balance land use and transportation systems to reduce greenhouse gas emissions from cars and light trucks.

Location: The Plan includes all of Tulare County, including the eight incorporated cities and the Tule River Reservation.

COMMENTS AND RECOMMENDATIONS

The NOP indicates the PEIR will inform decision makers and the public about potential significant environmental effects associated with the implementation of the Plan and Plan alternatives. CDFW offers the comments and recommendations below to assist TCAG 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 PEIR prepared for this Plan.

Special-Status Species

Based on aerial imagery and species occurrence records from the California Natural Diversity Database (CNDDB) (CDFW 2025) as well as CDFW's familiarity with biological resources in the Plan area, and given that the Plan encompasses the entirety of Tulare County, CDFW recommends that special-status species be considered as part of the PEIR that will be prepared for this Plan, including, but not limited to, the species identified in **Attachment 1** of this letter. These resources need to be evaluated and addressed as part of the PEIR and prior to any approvals that would allow vegetation- or ground-disturbing activities. CDFW also recommends that the PEIR analyze potential impacts to these species and provide measurable mitigation measures that would reduce impacts to less than significant levels as needed for projects tiered (streamlined) from this Plan.

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Botanical Surveys: CDFW recommends that the PEIR for this Plan include a measure requiring that projects tiered from this Plan located within natural habitats 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”. 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 United States Fish and Wildlife Service (USFWS) be conducted to determine permitting needs.

California Endangered Species Act: Reasonably foreseeable future projects tiered from this Plan may be subject to CDFW's regulatory authority pursuant to the California Endangered Species Act (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 ITP, pursuant to Fish and Game Code section 2081 subdivision (b), prior to any ground disturbing activities. In addition, CDFW recommends that mitigation measures for the CESA listed species be fully addressed in the CEQA document prepared for any future project tiered from this Plan.

California Natural Diversity Database (CNDDDB): Please note that the CNDDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDDB does not mean that a species is not present. All projects tiered from this Plan should adequately assess any potential project-related impacts to biological resources by ensuring biological surveys are conducted by a qualified wildlife biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology as warranted in order to determine whether or not any special-status species are present at or near the project area.

CEQA Alternatives Analysis: CDFW recommends that the information and results obtained from the cumulative impacts analysis conducted as part of this Plan's PEIR be used to develop and modify the Plan's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. Please note that when efforts to

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avoid and minimize impacts have been exhausted for projects tiered from this Plan, remaining impacts to sensitive biological resources may need to be mitigated to reduce impacts to a less than significant level, if feasible.

Cumulative Impact Analysis: Given that a Plan serves 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 Plan, 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 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.

Federally Listed Species: CDFW recommends projects tiered from this Plan consult with the U.S. Fish and Wildlife Service (USFWS) on potential impacts to federally listed species. Take under the Federal Endangered Species Act (ESA) is more broadly defined than CESA; take under the ESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS is advised well in advance of any ground disturbing activities.

Lake and Streambed Alteration: Reasonably foreseeable future projects tiered from this Plan 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 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.

CDFW therefore recommends that the PEIR for this Plan include information related to these requirements of Fish and Game code and advise that projects tiered from this

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Plan retain a qualified biologist to determine if potential impacts to streams may require the need to notify pursuant to Fish and Game Code section 1602.

Nesting birds: CDFW encourages that all projects tiered from this Plan occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), each future project applicant is responsible for ensuring that implementation of their project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

CDFW recommends that a qualified biologist 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 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 a 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 support any variance from these buffers and notify CDFW in advance of implementing a variance.

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 the Plan or tiered project surveys to the CNDDDB. The

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CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

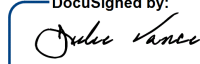
FILING FEES

The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document 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 environmental document filing 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 appreciates the opportunity to comment on the NOP to assist TCAG in identifying and mitigating the Plan's impact 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>). Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453 or john.riedel@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

ATTACHMENT

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

U. S. Fish and Wildlife Service
Matthew Nelson,
Matthew_Nelson@fws.gov

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REFERENCES

California Department of Fish and Wildlife. 2025. Biogeographic information and observation system (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 10 June 2025.

Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE SPECIAL-STATUS SPECIES TABLE

PROJECT: 2026 Tulare County Association of Governments Regional Transportation Plan & Sustainable Communities Strategy

SCH No.: 2025050379

Common Name	Scientific Name	Status	
		State	Federal
Gray wolf	<i>Canis lupus</i>	E	E
Tipton kangaroo rat	<i>Dipodomys nitratoide</i> <i>nitratoide</i>	E	E
Bald eagle	<i>Haliaeetus leucocephalus</i>	E/FP	None
California Condor	<i>Gymnogyps californianus</i>	E/FP	E
Least Bell's vireo	<i>Vireo bellii pusillus</i>	E	E
Willow flycatcher	<i>Empidonax traillii</i>	E	None
Blunt-nosed leopard lizard	<i>Gambelia sila</i>	E/FP	E
Foothill yellow-legged frog - south Sierra Distinct Population Segment	<i>Rana boylei</i> pop. 5	E	E
California jewelflower	<i>Caulanthus californicus</i>	E	E
Kaweah brodiaea	<i>Brodiaea insignis</i>	E	None
San Joaquin adobe sunburst	<i>Pseudobahia peirsonii</i>	E	T
San Joaquin Valley Orcutt grass	<i>Orcuttia inaequalis</i>	E	T
Springville clarkia	<i>Clarkia springvillensis</i>	E	T
Fisher - southern Sierra Nevada Evolutionary Significant Unit	<i>Vulpes vulpes necator</i> pop. 2	T	E
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	T	E
San Joaquin antelope squirrel	<i>Ammospermophilus nelsoni</i>	T	None
Sierra Nevada red fox - Sierra Nevada Distinct Population Segment	<i>Vulpes vulpes necator</i> pop. 2	T	E
Swainson's hawk	<i>Buteo swainsoni</i>	T	None
Tricolored blackbird	<i>Agelaius tricolor</i>	T	None
California tiger salamander – Central California Distinct Population Segment	<i>Ambystoma californiense</i>	T	T
Striped adobe-lily	<i>Fritillaria striata</i>	T	None
Golden eagle	<i>Aquila chrysaetos</i>	FP	None

Western burrowing owl	<i>Athene cunicularia hypugaea</i>	C	None
Crotch's bumble bee	<i>Bombus crotchii</i>	C	None
Greene's tuctoria	<i>Tuctoria greenei</i>	R	E
Tracy's eriastrum	<i>Eriastrum tracyi</i>	R	None
Twisselmann's buckwheat	<i>Eriogonum twisselmannii</i>	R	None
American badger	<i>Taxidea taxus</i>	SSC	None
Tulare grasshopper mouse	<i>Onychomys torridus tularensis</i>	SSC	None
Pallid bat	<i>Antrozous pallidus</i>	SSC	None
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC	None
Western mastiff bat	<i>Eumops perotis californicus</i>	SSC	None
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC	None
Mountain plover	<i>Charadrius montanus</i>	SSC	None
Coast horned lizard	<i>Phrynosoma blainvillii</i>	SSC	None
Northern California legless lizard	<i>Anniella pulchra</i>	SSC	None
Northwestern pond turtle	<i>Actinemys marmorata</i>	SSC	PT
San Joaquin coachwhip	<i>Masticophis flagellum ruddocki</i>	SSC	None
Western spadefoot	<i>Spea hammondi</i>	SSC	PT
Vernal pool tadpole shrimp	<i>Lepidurus packardii</i>	SA	E
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	SA	T
San Joaquin woollythreads	<i>Monolopia congdonii</i>	CRP	E
E= Endangered, T=Threatened, C= Candidate for listing as Threatened and/or Endangered, R= Rare, SSC= Species of Special Concern, FP= Fully Protected, PT=Proposed Threatened, SA=Special Animal, CRP=California Rare Plant Rank 1B			

Attachment 2

Attachment 2

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

**PLAN: 2026 Regional Transportation Plan and Sustainable
Communities Strategy**

SCH No.: 2025053709

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Special-Status Species	
Recommended Mitigation Measure 1: Pre-construction Survey for Special-Status Species	
Recommended Mitigation Measure 2: Special-Status Species Avoidance, Minimization, and Mitigation	
Special-Status Plants	
Recommended Mitigation Measure 3: Special-Status Plant Take Authorization	
Wildlife Corridors and Habitat Connectivity	
Recommended Mitigation Measure 4: Analysis and Monitoring of Wildlife Corridor	
Recommended Mitigation Measure 5: Infrastructure and Project Component Design	
Recommended Mitigation Measure 6: Compensatory Mitigation – Local Area Movement Corridors	
<i>During Construction</i>	
Special-Status Species	
Recommended Mitigation Measure 2: Special-Status Species Avoidance, Minimization, and Mitigation	
Special-Status Plants	

Recommended Mitigation Measure 3: Special-Status Plant Take Authorization	
<i>Post-Construction</i>	
Wildlife Corridors and Habitat Connectivity	
Recommended Mitigation Measure 4: Analysis and Monitoring of Wildlife Corridor	
Recommended Mitigation Measure 5: Infrastructure and Project Component Design	