



United States Department of the Interior

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SFR. Mr

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

In reply refer to:
81420-2008-TA-0518-1

December 14, 2007

Mr. Peter Hathaway
Sacramento Area Council of Governments (SACOG) 1415
L Street, Suite 300
Sacramento, California 95814

Subject: Comments on the Draft Environmental Impact Report for the Draft
Metropolitan Transportation Plan for 2035

Dear Mr. Hathaway:

13-1

This in response to your request for comments from the U.S. Fish and Wildlife Service (Service) on the proposed Draft Environmental Impact Report (DEIR) for the Draft Metropolitan Transportation Plan for 2035 (MTP 2035). The DEIR analyzes the environmental effects of various transportation projects in the Sacramento region, and proposes strategies to coordinate and manage these projects within the limits of resources in the area. Our comments relate specifically to potential impacts to federally-listed species comments in accordance with the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) (Act).

13-2

The Service believes there will be significant and likely unavoidable impacts to biological resources protected pursuant to the Act, including vernal pool species, giant garter snake, and the valley elderberry longhorn beetle, from the proposed transportation projects addressed in the DEIR. We are certain this will be the case for the Elk Grove/Rancho Cordova Connector and Placer Parkway as these projects are proposed in known vernal pool habitats.

13-3

The DEIR has indicated that impacts wildlife species and their habitats will be "avoided, minimized, and/or mitigated if necessary". While this programmatic approach is considered, the Service recommends specific strategies be described in the final EIR. Most listed species and vernal pool species in particular are threatened by loss and fragmentation of existing habitat. Vernal pool complexes are mosaics of wetted pools which are hydrologically connected and include the associated upland habitat and local watersheds essential for the function of the pools, and should be preserved on a landscape level to ensure the persistence of the species that inhabit them. In general our recovery plans should be used when evaluating where projects are planned and where compensation is proposed. The *Recover-I Plan for Vernal Pool Ecosystems of California and Southern Oregon* (Service 2005) (Recovery Plan) in particular describes core

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areas which are based on the known distribution of vernal pool species and habitats and include representative sites across a given species range, or support high species diversity. The Recovery Plan recommends a rigorous preservation component of vernal pool habitat the Service feels help ensure recovery of these species.

13-4

As a primary consideration the Service recommends that SACOG implement the strategies in our Recovery Plan. Thus, Table ES-2 could be revised to include implementation and consistency with the Recovery Plan as a conservation measure for impacts to biological resources. Specific alternative conservation strategies for vernal pool species and others not addressed in the Recovery Plan could include information and approaches considered in the proposed Habitat Conservation Plans in Placer and Sacramento County. While, these plans have not been submitted in draft or final forms, the Counties have developed a number of alternative strategies that the Service considers protective of listed species. Working with the County and Service staff we could use this information to develop conservation priorities for your projects. As a third alternative, Service staff are available to work with the SACOG to develop conservation strategies focused on your proposals. Whichever direction you take, we do believe since specific projects are proposed, specific conservation strategies to address the Act are necessary.

Thank you for the opportunity to review this project. If we can be of further assistance, please contact Jana Milliken of my staff at 916-414-6600.

Sincerely,



Kenneth Sanchez Assistant
Field Supervisor

cc:

Mr. Dan Gifford, California Department of Fish and Game, Rancho Cordova, California
Mr. John Baker, National Marine Fisheries Service, Sacramento, California