

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE  
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**CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR  
RESTORATION PROJECTS  
CONCURRENCE NO. 21080.56-2025-079-R3**

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**Project:** Alma Bridge Road Newt Passage Project  
**Location:** Santa Clara County  
**Lead Agency:** Santa Clara County, acting by and through its Department of Roads and Airports  
**Lead Agency Contact:** Ben Aghegnehu; [ben.aghegnehu@rda.sccgov.org](mailto:ben.aghegnehu@rda.sccgov.org)

**Background**

Project Location: The Alma Bridge Road Newt Passage Project (Project) is located along an approximately 4.64-mile-long segment of Alma Bridge Road that follows the northern and eastern shores of Lexington Reservoir, located in Santa Clara County, in the foothills of the Santa Cruz Mountains, south of the Town of Los Gatos and north of the unincorporated area of Lexington Hills. Alma Bridge Road is the main access point to the reservoir, Lexington Reservoir County Park, and the park's associated recreational amenities. Lexington Reservoir is a large, perennial waterbody owned and managed by the Santa Clara Valley Water District (Valley Water) and impounds flow from Los Gatos Creek, storing up to 19,044 acre-feet of water. The reservoir supports California newt (*Taricha torosa*) breeding. The Project area is approximately 43 acres in size, owned by Santa Clara County, and located along the approximate coordinates of 37.200360, -121.981521 to 37.173443, -121.983955.

Project Description: Santa Clara County, acting by and through its Department of Roads and Airports (Lead Agency), in partnership with Midpeninsula Regional Open Space District (MidPen), proposes to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, and restore or provide habitat for California native fish and wildlife. The Project is designed to restore safe migratory wildlife passage along Alma Bridge Road, which bisects a wildlife migration corridor connecting existing upland habitat to aquatic habitat within Lexington Reservoir. Alma Bridge Road has been documented as one of the largest recorded wildlife roadkill locations in California. The Project will benefit Pacific newt species, including California newts (*Taricha torosa*), as well as other herpetofauna, including Santa Cruz black salamander (*Aneides flavipunctatus niger*), California giant salamander (*Dicamptodon ensatus*), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), northwestern pond turtle (*Actinemys marmorata*), and rough-skinned newt (*Taricha granulosa*), which migrate from adjacent upland habitat to use aquatic habitat within Lexington Reservoir for breeding. Where these species are present in the watershed, improved habitat permeability across

Alma Bridge Road would contribute to their populations' persistence by reducing anthropomorphic injury/mortality; restoring/enhancing natural processes like nutrient flow, gene flow, seasonal migration, and predator-prey relationships; and providing resilience against catastrophic events such as drought, wildfire, or disease.

Alma Bridge Road is a barrier to wildlife movement and dispersal between Lexington Reservoir to the west and natural lands belonging to MidPen, Santa Clara County Parks (County Parks), Valley Water, San Jose Water Company (San Jose Water), as well as private undeveloped lands to the north and east. Between 2017 and 2023, approximately 34,000 California newts were recorded dead on the road as the result of vehicle traffic along Alma Bridge Road. The Project will focus on four Priority Zones (Zone 1, 2, 2a, and 3) identified as roadkill hotspot areas located along the 4.64-mile-long segment of Alma Bridge Road between Aldercroft Heights Road and State Route 17. The Project will address these locations using a set of Restoration Measures that would be implemented to facilitate safer migration and passage for moving wildlife. The Restoration Measures will be installed underneath the existing roadway, or as part of sections of elevated roadway, within the existing road prism along the cut-and-fill and/or benched roadway. The Restoration Measures will be implemented within the four Priority Zones along Alma Bridge Road and implementation may be phased by Priority Zone based on wildlife mortality statistics. The following four types of Restoration Measures would be used in different combinations at each Priority Zone and would be installed to channel the movement of amphibians and other small species through strategic placement of these Restoration Measures, further preventing wildlife from entering sections of road identified as road mortality hotspots. Restoration Measures include:

1. Type 4 purpose-built passage structures are typically small to medium sized box culverts (up to 3 feet high by 5 feet wide) or other drainage culverts that would be repurposed or purpose-built to provide wildlife passage instead of functioning primarily for water conveyance.
2. Type 5 micro-passage structures are typically smaller (less than 3 feet wide, 17 to 20 inches tall) below-grade purpose-built wildlife micro-passages designed for wildlife movement.
3. Type 6 elevated road segments are continuous elevated road segments that function as microbridges where the road is raised between 8 inches up to several feet above an existing roadway, allowing room for wildlife passage below via Type 4 passage structures.
4. Repurposed cattle grates are typically 8.5 feet wide with an approximately 5-inch-deep open passage below that are strategically placed to prevent herpetofauna from entering sections of road identified as wildlife road mortality hotspots and to facilitate movement of herpetofauna and small to mid-sized mammals underneath the roadway.

To accommodate implementation of the Restoration Measures and ensure effectiveness of road permeability for wildlife, standard road updates and safety compliance elements have been incorporated into the Project and include:

5. Right-of-way. The Project is anticipated to require permanent acquisition of small

areas (ranging from less than 0.01 - 0.2 acres) and temporary easements from four parcels owned by Valley Water. Temporary easements are also anticipated from two parcels owned by MidPen.

6. Utilities. Existing utilities in the project area include overhead Pacific Gas and Electric Company electrical and Frontier communication lines, underground fiber optic lines, and drainage culverts. In some locations, overhead poles and underground fiber optic lines will need to be relocated or raised to accommodate Restoration Measures, including elevated roadway segments.
7. Drainage. New passage structures and associated retaining walls and guide walls will be placed to maintain existing drainage patterns, minimize drainage across the roadway, and avoid creating new point source discharge locations. Energy dissipation measures such as riprap aprons or other devices may be required to prevent erosion at new and potentially existing outfall locations.

Installation of elevated roadway segments may require temporary closure of Alma Bridge Road between Limekiln Canyon Road and Soda Springs Road, reversible traffic control, and/or temporary detours. Temporary staging areas will be limited to existing turnouts and road shoulders or existing paved surfaces. Adaptive management measures may be necessary to ensure Restoration Measures functionality and effectiveness. Adaptive management may include vegetation maintenance, repairing passage structure or barrier material gaps and failures, assessing and repairing damage from vehicles or severe weather, repairing erosion, removing obstructions (e.g., sediment, trash, excess vegetation), and incorporating modifications and improvements to Restoration Measures sites.

To allow for adaptive management, a monitoring program will be developed and implemented to determine the efficacy of the Project. The monitoring program will assess the permeability of passages and barriers to newt movement and estimate annual road mortality along Alma Bridge Road after implementation of Restoration Measures. If the implementation of Restoration Measures is phased, the updated modeling findings will be used to inform the newt connectivity improvements, design recommendations, and conservation efforts.

The Project area is located outside the current coverage area of the Santa Clara County Habitat Conservation Plan (Habitat Plan). However, the Santa Clara Valley Habitat Agency, the implementing entity for the Habitat Plan, has proposed an amended Habitat Plan (Amended Habitat Plan). If the Amended Habitat Plan is approved as proposed, the Project area would be located inside the coverage area of the Amended Habitat Plan. If the Amended Habitat Plan is approved as proposed, it would include, as the Habitat Plan currently includes, design requirements to minimize the impacts of certain transportation projects on wildlife movement and other avoidance and minimization measures for the protection of species and their habitats; the Project would be consistent with those design requirements and other avoidance and minimization measures in the Amended Habitat Plan as proposed. Further, if the Amended Habitat Plan is approved as proposed, the Project would support the conservation objectives of the Amended Habitat Plan.

Tribal Engagement: On January 5, 2024, the Lead Agency contacted the Native American Heritage Commission (NAHC), requesting a search of the NAHC's Sacred Lands file for any

Native America cultural resources that may be affected by the Project, and for a list of Native American individuals or Tribes who may have concerns regarding the Project. On February 12, 2024, Tribal Consultation Notices, including Project information, maps, and cultural resources information, were sent via email and U.S. mail to seven Tribes that were identified by the NAHC. Follow-up emails were sent on March 25, 2024. This resulted in active engagement with two Tribes, who requested further discussion with the Lead Agency.

On February 1, 2024, outreach and consultation with one Tribe was conducted related to a separate near-by project; during this consultation, information about the Project was provided. Later in April, May, and July of 2024, additional emails and phone calls were made to the remaining Tribes. MidPen, on behalf of the Lead Agency, will continue to reach out to Native American Tribes, including Tribes that have not previously engaged with MidPen, in order to build relationships and share information, including information about the Project.

Interested Party Coordination: In 2022, the Project team convened a technical group including representatives from the Newt Patrol (a community scientist group in the southern San Francisco Bay Area), California Department of Fish and Wildlife (CDFW), Peninsula Open Space Trust, County Parks, Valley Water, San Jose Water, Vulcan Materials Company (the owner of the Lexington Quarry off of Alma Bridge Road), Santa Clara Valley Audubon Society, Center for Biological Diversity, Sierra Club, Bay Area Ridge Trail, Santa Cruz Mountains Trail Stewardship, Los Gatos Rowing Club, as well as local resident representatives; to share Project information and obtain input on Project development. Three formal technical group meetings were held between 2022 and 2023 to review and discuss Project goals and provide input on Project deliverables. An additional meeting was held in 2024 focusing on input provided from recreational bicyclists. A Project-specific website has been developed to provide Project updates to MidPen's Board of Directors regarding input received during public meetings. Letters of support for the Project have also been received from Valley Water and the Wildlife Conservation Board. Additionally, coordination with regulatory agencies such as the Regional Water Quality Control Board, US Army Corps of Engineers, CDFW, and US Fish and Wildlife Service continue regarding anticipated Project permits. Continued engagement with the technical group and other interested parties will continue as the Project progresses through planning and implementation.

Anticipated Project Implementation Timeframes:

Start date: January 2027

Completion date: December 2040

Lead Agency Request for CDFW Concurrence: On September 18, 2025, the Director of the California Department of Fish and Wildlife (CDFW Director) received a concurrence request from the Lead Agency pursuant to Public Resources Code section 21080.56, subdivision (e) (Request). The Request seeks the CDFW Director's concurrence with the Lead Agency's determination on September 11, 2025, that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code (Lead Agency Determination). The CDFW Director's concurrence is required for the Lead Agency to approve the Project relying on this section of the California Environmental Quality Act (CEQA). (Pub. Resources Code, § 21000 et seq.).

## **Concurrence Determination**

The CDFW Director concurs with the Lead Agency Determination that the Project meets the qualifying criteria set forth in Public Resources Code section 21080.56, subdivisions (a) to (d), inclusive (Concurrence).

Specifically, the CDFW Director concurs with the Lead Agency that the Project meets all of the following conditions: (A) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (B) the Project may have public benefits incidental to the Project's fundamental purpose; (C) the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and (D) Project construction activities are solely related to habitat restoration. Pursuant to Public Resources Code section 21080.56, subdivision (g), CDFW will post this Concurrence on its CEQA Notices and Documents internet page: <https://wildlife.ca.gov/Notices/CEQA>.

This Concurrence is based on best available science and supported, as described below, by substantial evidence in CDFW's administrative record of proceedings for the Project.

This Concurrence is also based on a finding that the Project is consistent with and that its implementation will further CDFW's mandate as California's trustee agency for fish and wildlife, including the responsibility to hold and manage these resources in trust for all the people of California.

## **Discussion**

- A. Pursuant to Public Resources Code section 21080.56, subdivision (a), the CDFW Director concurs with the Lead Agency that the Project will exclusively conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or restore or provide habitat for California native fish and wildlife.

The Project will both restore, enhance, and assist in the recovery of California newts, herpetofauna, and small to mid-sized mammals within the Project area, and the habitat upon which they depend; and will restore habitat for California newts, other herpetofauna, and small to mid-sized mammals in the Project area. The Project would improve habitat permeability across Alma Bridge Road through implementation of four Restoration Measures meant to reduce road related wildlife mortality. Implementation of the Project would restore/enhance habitat permeability to wildlife movement and dispersal, between Lexington Reservoir to the west and natural lands belonging to MidPen, County Parks, Valley Water, San Jose Water, and private undeveloped land to the east. Restoring and enhancing habitat permeability will also reduce habitat fragmentation, edge effects, and habitat degradation on a micro- and macro- level within the watershed as well as between the adjoining natural lands and open spaces.

Many species, including California newts, have been documented as roadkill on the 4.64-mile-long segment of Alma Bridge Road that is part of the Project area, including aquatic garter snakes (*Thamnophis atratus*), arboreal salamanders (*Aneides lugubris*), California slender salamanders (*Batrachoseps attenuatus*), coast night snakes (*Hypsiglena ochrorhyncus*), ensatinas (*Ensatina eschscholtzii*), Sierran tree frogs (*Psuedacris sierra*), ring-necked snakes (*Diadophis punctatus*), Santa Cruz black salamanders, sharp-tailed snakes (*Contia tenuis*), southern alligator lizards (*Elgaria multicarinata*), western fence lizards (*Sceloporus occidentalis*), western skinks (*Plestiodon skiltonianus*), western toads (*Anaxyrus boreas*), and western whiptails (*Aspidoscelis tigris*). In addition, deer mice (*Peromyscus maniculatus*) and shrew species (*Sorex* sp.) have been documented within the Project site. Restoring habitat connectivity and permeability across Alma Bridge Road would benefit these herpetofauna and small to mid-sized mammals by reducing anthropomorphic injury/mortality; restore and enhance natural processes like nutrient flow, gene flow, seasonal migration, and predator-prey relationships; and provide resilience against catastrophic events such as drought, wildfire, or disease.

- B. Pursuant to Public Resources Code section 21080.56, subdivision (b), the CDFW Director concurs with the Lead Agency that the Project may have incidental public benefits, such as public access and recreation.

The Project may result in incidental public safety and recreational benefits. Specifically, the Project will provide for continued use of Alma Bridge Road and the surrounding recreational areas and facilities by maintaining public access to the roadway. Furthermore, in order to implement the Restoration Measures the Project will need to include updated safety measures to be in compliance with current County design criteria and standards. This includes the Project area being updated to current traffic ratings, weight related load requirements, bicycle safety measures, and installing traffic guardrails without increasing traffic capacity on Alma Bridge Road.

- C. Pursuant to Public Resources Code section 21080.56, subdivision (c), the CDFW Director concurs with the Lead Agency that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery, and includes procedures and ongoing management for the protection of the environment.

Long-term Net Benefits to Climate Resiliency: California newts and other herpetofauna in the Santa Cruz Mountains region, including the Project area, have experienced severe population declines and extirpation from large portions of their range, primarily due to habitat loss and fragmentation. Climate change and disease are expected to drive further population declines and range losses of newts and other herpetofauna, as these species are unable to migrate long distances, and movement and dispersal are affected by barriers such as roads and topography. Limitation to movement also limits the ability for many herpetofauna species to disperse overland to new habitats and to recover from disturbances that are likely to increase with climate change, including high-intensity wildfire and habitat drying from increased air temperatures and hydrological changes.

The Project will increase climate resiliency for herpetofauna species by providing protected wildlife movement and improved habitat connectivity across an elevational gradient. The Project would allow for herpetofauna and small to mid-sized mammal movement to adapt to changes in water levels at Lexington Reservoir, moisture availability, and vegetation composition that could result from a changing climate.

Long-term Net Benefits to Biodiversity: The Project will have long-term net benefits to biodiversity throughout the watershed by connecting suitable and historical habitats for a range of amphibians, reptiles, and small to mid-sized mammals whose habitat is currently bisected by Alma Bridge Road. Overall, restoring habitat connectivity on Alma Bridge Road would increase habitat availability, enhance breeding success, support greater species diversity, and remove a significant source of unnatural, anthropomorphic mortality.

One consequence of habitat fragmentation and species mortality is the loss of genetic diversity, often resulting in population decline and a reduction in the variation in the gene pool of a species population. A decrease in genetic variability within a species can result in an increase in the frequency of genetic disorders, and a decrease in resistance to diseases. Restoring habitat connectivity and improving habitat permeability is expected to have several benefits, including reducing anthropomorphic injury and mortality to native wildlife; restoring and enhancing natural processes like nutrient flow, gene flow, seasonal migration, and predator-prey relationships; and providing resilience against catastrophic events such as drought, wildfire, or disease. These benefits will eliminate the effects from a genetic population bottleneck, habitat fragmentation, edge effects, and habitat degradation on a micro- and macro- level within the watershed as well as between the adjoining natural lands and open spaces. Such benefits would be realized not only for California newt, but also the assemblage of herpetofauna and small to mid-sized mammals observed in the Project area, including California slender salamanders, arboreal salamanders, western toads, Sierran tree frogs, ensatinas, western fence lizards, southern alligator lizards, western skinks, western whiptails, northern Pacific rattlesnakes (*Crotalus oreganus*), ring-necked snakes, aquatic garter snakes, California king snakes (*Lampropeltis californiae*), California whipsnakes (*Masticophis lateralis*), coast night snakes, sharp-tailed snakes, gopher snakes (*Pituophis catenifer*), striped skunks (*Mephitis mephitis*), broad-footed moles (*Scapanus latimanus*), western gray squirrels (*Sciurus griseus*), California voles (*Microtus californicus*), California ground squirrels (*Otospermophilus beecheyi*), California pocket mice (*Chaetodipus californicus*), California mice (*Peromyscus californicus*), deer mice, dusky-footed woodrats (*Neotoma fuscipes*), and ornate shrews (*Sorex ornatus*).

Long-term Net Benefits to Sensitive Species Recovery: Between 2017 and 2024, approximately 34,000 California newts were recorded dead on the road as the result of vehicle traffic along Alma Bridge Road. With an estimated localized road mortality rate of 39.2 percent, California newt is under the potential threat of extirpation within the surrounding area of the Project. The Project will reduce road mortality and allow for population recovery for California newts and other herpetofauna. In addition to the California newt, several additional key, predominantly special-status species are

present in Santa Clara County, representing the assemblage of herpetofauna in the Project area and include Santa Cruz black salamander, California giant salamander, California red-legged frog, foothill yellow-legged frog, northwestern pond turtle, and rough-skinned newt.

The Project area lies within an area identified as part of the South Coast Wildland's Bay Area Critical Linkages. Within this linkage, the Project area provides connectivity across the Santa Cruz Mountains and includes the Santa Cruz Mountains-Diablo Range Linkage to the east, and the Santa Cruz Mountains-Gabilan Range Linkage to the south. Dusky-footed woodrat, California pocket mouse, California giant salamander, western toad, California red-legged frog, foothill yellow-legged frog, California red-legged frog, California king snake, and northwestern pond turtle were considered during the design and designation of the Santa Cruz Mountains-Diablo Range Linkage and the Santa Cruz Mountains-Gabilan Range Linkage. The Project will contribute to recovery for these species, specifically California red-legged frog and foothill yellow-legged frog, by enhancing and restoring habitat connectivity. Additionally, this Project would complement the nearby State Route 17 wildlife undercrossing, which is designed to accommodate passage and habitat permeability for special-status species, including southwestern pond turtle, California giant salamander, Santa Cruz black salamander, and California red-legged frog; and would improve large scale habitat connectivity and species movement within the Coyote Creek and the Los Gatos Creek Watersheds, including Limekiln Canyon/Creek, Soda Springs Creek, and Hendry's Creek, which intersect Alma Bridge Road and connect to Lexington Reservoir.

Procedures for the Protection of the Environment: The Project has incorporated a preliminary list of avoidance and minimization measures for the protection of species and their habitats which are consistent with the Habitat Plan and would be consistent with the Amended Habitat Plan if approved as proposed. These measures include standard implementation Best Management Practices. Project protection measures include pre-Project surveys for sensitive species; incorporation of work exclusions and buffer areas; active monitoring and site inspections during implementation; worker environmental awareness training; erosion control; work-window restrictions; species-specific avoidance measures; and post-Project performance monitoring. Additional protection measures required by future regulatory approvals for the Project will also be incorporated into the Project.

Ongoing Management for the Protection of the Environment: To account for post-restoration adaptive management, the Project will develop and implement a subsequent monitoring program to determine the efficacy of the Project, which will include a monitoring protocol to determine the post-project permeability of passages and barriers to newt movement and to estimate annual road mortality along Alma Bridge Road after implementation of Restoration Measures. The protocol will include both data collection via camera trapping and analysis methods to determine effectiveness and permeability. Updated modeling findings will be used to inform the newt connectivity improvements, design recommendations, and conservation efforts for future phases of the Project. Thus, the Lead Agency anticipates the potential for



minor changes to some Project elements in future phases of the Project. Additionally, the Lead Agency will conduct future management of Restoration Measures, including periodic maintenance that avoids full road closure such as sediment, debris and trash clearing; vegetation maintenance; and passage structure repair.

This Project will also establish a template for wildlife connectivity effectiveness modeling and wildlife crossing structure design for future projects. This is one of the first wildlife connectivity improvement projects in California to apply a rigorous feasibility analysis to inform Project design, backed by modeling the effectiveness of various Restoration Measures opportunities project-wide and includes considerations of non-environmental constraints such as engineering, design, cost, schedule, and recreation use. Specifically, this Project utilizes expected permeability modeling conducted early in the conceptual design phase based on passage size and passage structure characteristics paired with what is known about migrating amphibians from existing road ecology literature (e.g., turnaround distances) to plan for population persistence. All such findings will be used to inform not only project improvements and design recommendations but also create a basis-of-design and design plans that can be used or adapted to meet the needs of other herpetofauna species or projects with similar design constraints.

- D. Pursuant to Public Resources Code section 21080.56, subdivision (d), the CDFW Director concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration.

All Project construction activities are solely related to habitat restoration and management. The Project's exclusive goal is providing safe passage for California newts, other herpetofauna, and small to mid-sized mammals across Alma Bridge Road. The Project would install crossings in the form of Type 4 passage structures, Type 5 micro-passages, and repurposed cattle grates underneath the existing roadway or as part of Type 6 elevated road segments. Directional barriers (guide walls and/or fencing) would be installed to channel amphibians and other small species to under-crossings. To accommodate the crossings and restore passage, implementation will need to include road updates to meet current safety compliance standards and will include the installation of uphill cut-slopes, downhill retaining walls, and guardrails along all or portions of the Project areas; speed reduction signage; relocation or modification of overhead and underground utilities; and new and modified drainage facilities, including riprap aprons or other devices if needed to prevent erosion at new and potentially existing outfall locations and maintain Project durability. Installation of Type 4 and 5 passages and cattle grates will be done by "cut and cover" of the existing roadway or as part of installation of elevated road segments. Where roadway sections are raised to accommodate crossings, the grades of existing turnout areas, shoulders, driveways, and adjacent roads will also be raised to provide a safe transition for travelers. Turnouts or road shoulders adjacent to elevated road segments will include directional fencing and/or guide walls that minimize newt mortality and permit or enhance newt movement.

Staging areas would be limited to existing turnouts and road shoulders or existing paved surfaces. Clearing and grubbing, grading, retaining wall and guardrail installation, drainage work and utility relocation, pavement work, and adding signage and road striping would be required to accommodate the crossings. Heavy equipment may include backhoes, excavators, pile drillers or drivers, compactors, cranes, dozers, and graders.

### **Scope and Reservation of Concurrence**

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the Request. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency Determination, the Lead Agency, or any other public agency that proposes to carry out or approve the Project, shall submit a new lead agency determination and request for concurrence from CDFW pursuant to Public Resources Code section 21080.56. If any other public agency proposes to carry out or approve the Project subsequent to the effective date of this Concurrence, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required so long as the other public agency is carrying out or approving the Project as described by the Lead Agency Determination and the Request.

In its request for a concurrence, the Lead Agency set forth potential bases for a determination that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery. Although the CDFW Director agrees with the Lead Agency that the Project will provide such long-term net benefits, this Concurrence is not intended to be and should not be construed as an endorsement of every argument set forth in the Lead Agency's concurrence request.

If the Amended Habitat Plan is approved as proposed, the Project would: (A) be consistent with the design requirements to minimize the impacts of certain transportation projects on wildlife movement and other avoidance and minimization measures for the protection of species and their habitats in the Amended Habitat Plan; and (B) support the conservation objectives of the Amended Habitat Plan. This Concurrence does not analyze or consider the Project being used to satisfy any other avoidance, minimization, or mitigation requirement for a regulatory permit or approval, regulatory enforcement action or settlement, court order, or other enforceable legal obligation.

### Other Legal Obligations

The Project shall remain subject to all other applicable federal, state, and local laws and regulations, and this Concurrence shall not weaken or violate any applicable environmental or public health standards. (Pub. Resources Code, § 21080.56, subd. (f).)

### CDFW Director's Certification

By: 

Date: 11.14.2025

Charlton H. Bonham, Director  
California Department of Fish and Wildlife