February 10, 2026
Resubmitted February 18, 2026 to reflect additional signatories.

Submitted via email: CT-TAM@dot.ca.gov and ctc@catc.ca.gov

Re: Draft 2026 Transportation Asset Management Plan (TAMP)

Thank you for the opportunity to comment on the Draft 2026 Transportation Asset Management Plan (TAMP). We recognize the significant effort required to develop a long-range, performance-based framework for managing California's State Highway System (SHS) and National Highway System (NHS), particularly in the context of constrained funding, climate impacts, and growing demands on the transportation system. We are especially grateful to the California Transportation Commission for authorizing funding to complete wildlife crossing projects like the Wallis Annenberg Crossing and the I-15/Brightline West High-Speed Rail overpasses. At the same time, the Draft 2026 TAMP reveals a fundamental and increasingly consequential gap: infrastructure that supports wildlife connectivity and wildlife-vehicle collision (WVC) reduction is not recognized within the asset management framework. As organizations with deep expertise on wildlife conservation and connectivity, we respectfully offer the following recommendations for inclusion of these priorities into the final 2026 TAMP.

California's transportation system is a well-documented driver of habitat fragmentation and wildlife population decline across the state. Roads and highways fragment large, contiguous habitats into smaller, isolated patches, disrupting migration routes, restricting gene flow, and increasing mortality

from WVCs.[1] Peer-reviewed research and statewide assessments consistently identify transportation infrastructure as one of the primary sources of landscape fragmentation affecting terrestrial wildlife in California, contributing to long-term population declines and reduced ecosystem resilience.[2] Wildlife crossings and associated infrastructure—such as overcrossings, undercrossings, fencing, and adapted bridges and culverts—are among the most effective and durable tools for addressing these impacts, with studies demonstrating reductions in wildlife–vehicle collisions of 80–90 percent or more at treated locations while restoring functional landscape connectivity.[3]

Recognizing these benefits, California has adopted multiple statutes and statewide policies directing the integration of wildlife connectivity and collision reduction into transportation planning and delivery.[4] Despite these laws and policies explicitly acknowledging wildlife crossings and connectivity infrastructure as essential strategies for improving safety, resilience, and long-term system performance, the Draft 2026 TAMP does not mention or operationalize these directives through:

1. Asset definitions,
2. Inventory and condition assessments,
3. Performance measures and targets,
4. Lifecycle planning and lifecycle cost analysis, or
5. Other considerations.

The disconnect from state policy to the state's primary investment planning document for maintaining the state and national highway system limits the ability to translate adopted goals into actionable planning and investment mechanisms. This omission is notable given that transportation infrastructure itself is a primary driver of habitat fragmentation, collision risk, and climate vulnerability.

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[1] Huijser, M. P., McGowen, P. T., Fuller, J., Hardy, A., Kociolek, A., Clevenger, A. P., Smith, D., & Ament, R. (2008). Wildlife-vehicle collision reduction study: Report to Congress (FHWA-HRT-08-034). Federal Highway Administration, U.S. Department of Transportation at 57.

[2] *See, e.g.,* California Dep't of Transportation. Caltrans Wildlife Connectivity Program Report at 4 (July 1, 2024), *("*Proactively addressing fish and wildlife connectivity on the SHS will move Caltrans forward as stewards of California's landscape and reduce fragmentation of habitat caused by roadways that contribute to the steady decline of threatened, endangered, special status, and other common species."); California Dep't of Fish & Wildlife, Status Review of the Petitioned Southern California/Central Coast Evolutionarily Significant unit (ESU) of Mountain Lion (*Puma concolor couguar*) in California at 27, ("Vehicle strikes were the main mortality factor for mountain lions in the SA genetic population, and a secondary mortality factor in the EPR genetic populations . . . The enhancement and/or creation of safe wildlife road crossings may be critical for maintaining lion persistence in these genetic populations.") (*internal citations omitted*) at 27. California Dep't of Fish & Wildlife, draft State Wildlife Action Plan (October 2025) at 2-42, ("Existing transportation infrastructure, such as roads and highways, can fragment the landscape and create barriers to wildlife movement, be a conduit for invasive species, increase accidental ignition points for wildfire, and cause mortality to wildlife due to collisions.").

[3] *See* Huijser, M. P., McGowen, P. T., Fuller, J., Hardy, A., Kociolek, A., Clevenger, A. P., Smith, D., & Ament, R. (2008). Wildlife-vehicle collision reduction study: Report to Congress (FHWA-HRT-08-034). Federal Highway Administration, U.S. Department of Transportation, at 106-123.

[4] Div 1 Ch 1 SHC § 158-158.5, Barriers to Wildlife Movement; Div 1 Ch 1 SHC § 156-156.5, Barriers to Fish Passage; Div 2 Ch 13.5 FGC 1955-1957, Wildlife Connectivity Actions ; Div 3 Ch 20 SHC § 2704.04-2704.095, High Speed Rail Div 26 Ch 6 PRC § 35180-35186, Coyote Valley Conservation Program; California Transportation Plan 2050; draft State Highway System Management Plan (2025).

We respectfully offer the following amendments to the draft 2026 TAMP to align transportation planning with statewide goals.

1. **Recognize Wildlife Connectivity and WVC-Reduction as Performance Objectives that Deliver Priority Transportation Functions.**

We recommend clarifying that wildlife connectivity and WVC reduction are priority transportation performance objectives. Infrastructure elements that enable wildlife movement and reduce collisions, such as wildlife crossings, fencing, adapted culverts, and barrier retrofits, are not mentioned in the TAMP as performance objectives, measures, or target, even though they deliver measurable transportation benefits:

- **Reduces crash frequency and severity**, improving safety and operations outcomes and reducing incident response, property damage, and fatality or injury costs.
- **Protects existing capital investments** by preventing roadway damage, emergency repairs, and reactive maintenance associated with collisions and flooding. [5]
- **Enhances system resilience**, particularly where structures are designed to accommodate both hydrologic flows and wildlife movement. [6]
- **Provides long-term performance benefits** that accrue over decades, consistent with TAMP time horizons. [7]

Treating these features as incidental or external to transportation planning is inconsistent with the TAMP's goals of understanding the inventory and condition of the California transportation system. Consistent with Congress' recent finding that "greater adoption of wildlife-vehicle collision safety countermeasures is in the public interest," 23 U.S.C. § 171(a), transportation infrastructure that facilitates wildlife connectivity and reduces collisions materially affects safety, operations, performance, and lifecycle cost and therefore warrants inclusion within the asset management framework.

We recommend that the TAMP recognize wildlife connectivity and WVC-reduction infrastructure as a distinct performance objective, consistent with how other functional systems are treated. Under this approach, existing asset types would retain their current classifications, while their performance would be evaluated, where applicable, for wildlife connectivity and WVC-reduction. In addition, the TAMP should acknowledge a limited set of supplementary transportation assets managed on the State Highway System that directly contribute to these performance objectives, like elevated road segments and jump-outs, that are not currently included in any asset category.

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[5] Huijser, M. P., Duffield, J. W., Clevenger, A. P., Ament, R. J., & McGowen, P. T. (2009). Cost–benefit analyses of mitigation measures aimed at reducing collisions with large ungulates in the United States and Canada: A decision support tool. Ecology and Society, 14(2), 15.

[6] *See* Caltrans Highway Design Manual, Chapter – 820 Cross Drainage at 820-1, ("When it is determined that wildlife is using these types of perennial or ephemeral channels for migration and movement, a culvert or bridge will have to convey wildlife in addition to flood flows.").

[7] Brennan, L. (2022). *Wildlife overpass structure size, distribution, effectiveness, and long-term performance considerations.* PeerJ.

Examples of physical assets that could reasonably fall within this category include the following:

- Wildlife undercrossings and overcrossings
- Bridges and culverts designed, retrofitted, or maintained to accommodate wildlife movement
- Fencing and guidance features that reduce collision risk
- Median and roadside modifications that function as movement barriers or filters
- Retrofits that restore connectivity at existing structures
- Elevated highway segments
- Jump-outs[8]

This recommendation does not require immediate or significant expansion. Rather, it establishes a framework for establishing performance targets and managing assets that already exist and are increasingly being delivered through capital projects.

2. Inventory and Condition Assessment of Wildlife Passage Infrastructure

To ensure the Transportation Asset Management Plan can effectively manage safety, resilience, and lifecycle cost risks associated with wildlife–vehicle collisions and ecological fragmentation, we recommend that the TAMP incorporate wildlife connectivity and WVC-reduction considerations within its inventory and condition assessment framework in the following ways:

(a) ***District-Level Inventory:*** TAMP should provide for a district-level inventory of assets that were developed or adapted to facilitate wildlife movement or reduce WVC and that are already embedded within the State Highway System.

(b) ***Condition and Functionality Assessment:*** In addition to identifying the presence of these assets, Caltrans Maintenance should include a basic assessment of their physical condition and functional status for wildlife connectivity as part of their routine culvert, bridge, and other asset inspections over time.[9] For wildlife connectivity and WVC-reduction infrastructure, functionality is a distinct and necessary consideration alongside structural conditions. A structure may be physically sound yet no longer serves its intended purpose if it is blocked, undersized, improperly aligned with surrounding habitat, or disconnected from associated features.

[8] *See ref,* Div 1 Ch 1 SHC § 158, Barriers to Wildlife Movement (*"*wildlife passage features means culverts, underpasses, overpasses, bridges, directional fencing, barrier breaks, wildlife monitoring devices or detection systems, elevated highway segments, or other features, supported by a functional or potentially functional ecological buffer of habitat on multiple approaches to a highway that encourage use of the feature and are designed to be managed or restored using the best available science to improve the ability of wildlife to safely traverse transportation infrastructure.").

[9] Consistent with Congress' declaration that it is in the vital interest of the U.S. to "to ensure adequate passage of aquatic and terrestrial species, where appropriate," these recommendations will better enable compliance with the forthcoming federal requirement that all bridge and tunnel inventories "shall determine if the replacement or rehabilitation of bridges and tunnels should include measures to enable safe and unimpeded movement for terrestrial and aquatic species." 23 U.S.C. § 144(a)(2)(F), 144(b)(1) & (6). If adopted, these recommendations will moreover help the state ground-truth "techniques to assess passage of aquatic and terrestrial species and habitat restoration potential," as required by the next bridge and tunnel inspector training program. Id. § 144(i)(3).

(c) ***Collaboration with Statewide Wildlife Prioritization Efforts:*** Inventory and functionality assessments should be informed by collaboration with California Department of Fish and Wildlife (CDFW) statewide mapping, wildlife–vehicle collision data, and connectivity prioritization efforts already underway. Leveraging existing, science-based datasets would improve risk identification, reduce duplicative data collection, and strengthen the performance-based foundation of the TAMP.

Without a clear, comprehensive inventory and basic functionality assessment, Caltrans cannot reasonably evaluate system performance, risk exposure, or future investment needs related to wildlife connectivity and WVC reduction. Incorporating these elements into Chapter 2 would mirror the treatment of other asset classes and support a more coherent, fiscally responsible approach to asset stewardship.

3. **Performance Measures and Targets for Wildlife Connectivity Infrastructure.**

Within asset-specific chapters, particularly those addressing pavements, bridges, drainage, and TMS features, we recommend that the TAMP incorporate functional considerations related to wildlife movement and WVC risk where they may affect safety outcomes, system resilience, lifecycle performance, or state conservation priorities. Integrating these considerations would allow performance discussions to more fully capture whether assets are functioning as intended within the broader transportation and environmental context in which they operate.

For linear transportation infrastructure, asset performance is not determined solely by physical condition, but also by how assets interact with surrounding landscapes and species movement patterns. Assets that are structurally sound may nonetheless contribute to elevated collision risk, increased maintenance costs, or reduced resilience if they function as movement barriers, funnel wildlife into travel lanes, or fail under changing hydrologic or climatic conditions.

Examples of functional performance considerations that could be incorporated within existing asset chapters include, but are not limited to:

(a) Pavement:

(i) Whether lane widths, shoulders, medians, and median barriers influence wildlife movement patterns or WVC risk, particularly in areas with documented collision hotspots.

(b) ***Bridges:***

(i) Whether bridges function as effective wildlife passage points or, conversely, as movement barriers due to span length, clearance, substrate conditions, or alignment with surrounding habitat.

(ii) Whether bridge retrofits or replacements maintain or improve landscape permeability, particularly in areas with known wildlife movement or collision risk.

(iii) Whether bridge designs that accommodate both hydrologic flows and wildlife movement enhance asset resilience and reduce long-term risk of roadway damage, emergency repairs, or collision-related costs.

(c) Drainage Assets

(i) Whether culverts and drainage structures are sized, aligned, and designed to function as both hydrologic conveyance and wildlife movement pathways where appropriate, or whether undersized or perched structures contribute to habitat fragmentation, collision risk, or asset failure.

(ii) Whether drainage assets designed for historic flow regimes remain functional under projected climate conditions, including increased peak flows that may alter wildlife movement patterns or compromise asset performance.

(iii) Whether sediment accumulation, outlet erosion, or structural deterioration reduces both hydrologic and ecological function over time, increasing maintenance demands and safety risks.

(d) Transportation Management Systems (TMS)

(i) Whether wildlife detection systems, dynamic signage, and other operational tools are deployed in locations with persistent or emerging wildlife–vehicle collision risk.

(ii) Whether TMS features are evaluated based on functional effectiveness in reducing collisions and improving safety outcomes.

(iii) Whether collision data and wildlife movement information are used to adaptively manage TMS deployments over time as conditions change.

Including these considerations would support that performance discussions reflect not only asset condition, but also whether assets are performing as intended under current and future conditions.

To ensure these considerations meaningfully inform decision-making, the TAMP should establish performance targets within the pavement, bridge, drainage, and TMS asset chapters. For example, the TAMP could explicitly commit to at least partial remediation of the top twelve Wildlife Connectivity Barriers[10] on the State Highway System in the next ten years. Alternatively, rather than setting a quantitative target at this stage, the TAMP could commit to a collaborative process between Caltrans, CDFW, and relevant NGOs to identify, prioritize, and advance remediation of the most consequential wildlife movement barriers on the State Highway System. This approach would allow performance targets, whether framed around statewide priorities (e.g., the top 12 CDFW barriers) or regionally identified barriers—to be negotiated and refined over time based on funding availability, cost estimates, and the appropriate division of implementation responsibility.

Framing performance targets as an iterative outcome of interagency collaboration would provide flexibility while still signaling institutional commitment and would ensure future TAMP updates are grounded in shared data, feasibility, and demonstrated effectiveness in improving safety, resilience, and system performance.

[10] *See* Terrestrial Wildlife Connectivity Barriers, California Dep't of Fish & Wildlife, (last visited Feb 2, 2026).

4. **Wildlife Connectivity and WVC-Reduction Infrastructure Lifecycle Stewardship**

Wildlife connectivity and WVC-reduction infrastructure should be explicitly included within this lifecycle planning approach to ensure that assets designed to deliver safety and/or connectivity benefits continue to function over time. Integrating wildlife passage and wildlife-vehicle collision reduction infrastructure into routine maintenance, preservation, and replacement planning would allow Caltrans to manage these assets proactively across their lifecycle.

Functional performance of wildlife crossings and associated infrastructure can degrade due to blocked or eroded entrances, damaged or misaligned fencing, sediment accumulation, vegetation overgrowth, or changes in surrounding land use that reduce effectiveness even when the structure remains structurally sound. These function-specific degradation pathways have direct implications for safety outcomes, system performance, and lifecycle costs.

We recommend that Chapter 4 explicitly incorporate wildlife connectivity and WVC-reduction infrastructure —such as wildlife overcrossings and undercrossings, adapted bridges and culverts, fencing, and jump-outs—into life cycle planning and LCCA considerations. This would allow Caltrans to account for the distinct maintenance needs, treatment types, and deterioration patterns in its modeling approach as well as evaluate the cost-effectiveness of timely maintenance and rehabilitation relative to reactive repairs or asset failure.

Integrating wildlife connectivity and WVC-reduction infrastructure into LCP would be consistent with the TAMP's stated principle that proactive, well-timed investments improve asset condition and reduce long-term costs, while ensuring that infrastructure intended to deliver safety and connectivity benefits continues to perform as designed throughout its service life.

5. Additional Policy Considerations for Incorporating Wildlife Connectivity into Projects

Caltrans should encourage stronger alignment across its planning and investment programs to advance wildlife connectivity and WVC-reduction infrastructure. Consistently recognizing wildlife connectivity, WVC-reduction, habitat restoration, and climate resilience as legitimate asset improvements within capital programming criteria would help ensure that planning priorities translate into implementation.

Conclusion:

The Draft 2026 Transportation Asset Management Plan provides an important foundation for performance-based stewardship of California's transportation system. However, the absence of wildlife connectivity and WVC-reduction infrastructure from the asset management framework limits the TAMP's ability to fully address known safety risks, system vulnerabilities, and long-term lifecycle costs.

Recognizing wildlife connectivity infrastructure as transportation assets and incorporating functional performance and lifecycle considerations within existing TAMP frameworks would strengthen the Plan without requiring new programs or mandates. Doing so would improve alignment with adopted state policies, enhance safety and resilience outcomes, and support more effective, cost-efficient asset stewardship over time.

We appreciate the opportunity to comment and look forward to continued engagement as the TAMP is refined and implemented.

For follow-up questions and information, please contact Mari Galloway at mari@wildlandsnetwork.org.

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February 10, 2026

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California's transportation system is a well-documented driver of habitat fragmentation and wildlife population decline across the state. Roads and highways fragment large, contiguous habitats into smaller, isolated patches, disrupting migration routes, restricting gene flow, and increasing mortality from WVCs.[1] Peer-reviewed research and statewide assessments consistently identify transportation infrastructure as one of the primary sources of landscape fragmentation affecting terrestrial wildlife in California, contributing to long-term population declines and reduced ecosystem resilience.[2] Wildlife crossings and

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[2] *See, e.g.,* The Nature Conservancy and SC Wildlands. California Missing Linkages 2000-2025: A Status Update at 9 (2025), *https://www.californiamissinglinkages.org/resources-and-products/* ("Linear infrastructure barriers fragment natural landscapes, isolating wildlife populations and disrupting ecological processes."); California Dep't of Transportation. Caltrans Wildlife Connectivity Program Report at 4 (July 1, 2024), *https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-wildlife-connectivity-report-ally.pdf (*"Proactively addressing fish and wildlife connectivity on the SHS will move Caltrans forward as stewards of California's landscape and reduce fragmentation of habitat caused by roadways that contribute to the steady decline of threatened, endangered, special status, and other common species."); California Dep't of Fish & Wildlife, Status Review of the Petitioned Southern California/Central Coast Evolutionarily Significant unit (ESU) of Mountain Lion (*Puma concolor couguar*) in California at 27, *https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=239696&inline (*"Vehicle strikes were the main mortality factor for mountain lions in the SA genetic population, and a secondary mortality factor in the EPR genetic populations . . . The enhancement and/or creation of safe wildlife road crossings may be critical for maintaining lion persistence in these genetic populations.") (*internal citations omitted*) at 27. California Dep't of Fish & Wildlife, draft State Wildlife Action Plan (October 2025) at 2-42,

associated infrastructure—such as overcrossings, undercrossings, fencing, and adapted bridges and culverts—are among the most effective and durable tools for addressing these impacts, with studies demonstrating reductions in WVCs of 80–90 percent or more at treated locations while restoring functional landscape connectivity.[3]

Recognizing these benefits, California has adopted multiple statutes and statewide policies directing the integration of wildlife connectivity and collision reduction into transportation planning and delivery.[4] Despite these laws and policies explicitly acknowledging wildlife crossings and connectivity infrastructure as essential strategies for improving safety, resilience, and long-term system performance, the Draft 2026 TAMP does not mention or operationalize these directives through:

1. Asset definitions,
2. Inventory and condition assessments,
3. Performance measures and targets,
4. Lifecycle planning and lifecycle cost analysis, or
5. Other considerations.

The disconnect from state policy to the state's primary investment planning document for maintaining the state and national highway system limits the ability to translate adopted goals into actionable planning and investment mechanisms. As a result, crossing projects are currently rarely included in transportation projects and rely almost exclusively on conservation funding sources to be implemented as stand-alone projects. This gap in transportation asset management limits crossings' inclusion in infrastructure planning and investment, resulting in fragmented implementation, underfunding, and missed opportunities to cost-effectively align transportation upgrades with ecological and climate goals.
We respectfully offer the following amendments to the draft 2026 TAMP to align transportation planning with statewide goals.

1. Recognize Wildlife Connectivity and WVC-Reduction Infrastructure as Transportation Assets and Set Performance Objectives

We recommend including all infrastructure elements that contribute to wildlife connectivity and WVC reduction as transportation assets, and that performance objectives for wildlife connectivity and associated infrastructure be set. Infrastructure elements that enable wildlife movement and reduce

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https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=229413&inline ("Existing transportation infrastructure, such as roads and highways, can fragment the landscape and create barriers to wildlife movement, be a conduit for invasive species, increase accidental ignition points for wildfire, and cause mortality to wildlife due to collisions.").

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collisions, such as wildlife crossings, fencing, adapted culverts, and barrier retrofits, are not mentioned in the TAMP as assets, even though they deliver measurable transportation benefits. This infrastructure:

- **Reduces crash frequency and severity**, improving safety and operations outcomes and reducing incident response, property damage, and fatality or injury costs.
- **Protects existing capital investments** by preventing roadway damage, emergency repairs, and reactive maintenance associated with collisions and flooding. [5]
- **Enhances system resilience**, particularly where structures are designed to accommodate both hydrologic flows and wildlife movement. [6]
- **Provides long-term performance benefits** that accrue over decades, consistent with TAMP time horizons. [7]

Treating these features as incidental or external to transportation planning is inconsistent with the TAMP's goals of understanding the inventory and condition of the California transportation system. Transportation infrastructure that facilitates wildlife connectivity and reduces collisions materially affects safety, operations, performance, and lifecycle cost and therefore warrants inclusion within the asset management framework.

We recommend that the TAMP recognize wildlife connectivity and WVC-reduction infrastructure as a distinct performance objective, consistent with how other functional systems are treated. Under this approach, existing asset types would retain their current classifications, while their performance would be evaluated, where applicable, for wildlife connectivity and WVC-reduction. In addition, the TAMP should acknowledge a limited set of supplementary transportation assets managed on the State Highway System that directly contribute to these performance objectives, like elevated road segments and jump-outs, that are not currently included in any asset category. Examples of physical assets that could reasonably fall within this category include the following:

- Wildlife undercrossings and overcrossings
- Bridges and culverts designed, retrofitted, or maintained to accommodate wildlife movement
- Fencing and guidance features that reduce collision risk
- Median and roadside modifications that function as movement barriers or filters
- Retrofits that restore connectivity at existing structures[8]

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[6] *See* Caltrans Highway Design Manual, Chapter – 820 Cross Drainage at 820-1, https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp0820--a11y.pdf ("When it is determined that wildlife is using these types of perennial or ephemeral channels for migration and movement, a culvert or bridge will have to convey wildlife in addition to flood flows.")

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- Elevated highway segments
- Jump-outs[9]

This recommendation does not require immediate or significant expansion. Rather, it creates a framework for establishing performance targets and managing assets that already exist and are increasingly being delivered through capital projects.

2. Inventory and Condition Assessment of Wildlife Passage Infrastructure

To ensure the Transportation Asset Management Plan can effectively manage safety, resilience, and lifecycle cost risks associated with wildlife–vehicle collisions and ecological fragmentation, we recommend that the TAMP incorporate wildlife connectivity and WVC-reduction considerations within its inventory and condition assessment framework in the following ways:

(a) ***District-Level Inventory:*** The TAMP should provide for a district-level inventory of assets that were developed or adapted to facilitate wildlife movement or reduce WVC and that are already embedded within the State Highway System.
(b) ***Condition and Functionality Assessment:*** In addition to identifying the presence of these assets, Caltrans Maintenance should include a basic assessment of their physical condition and functional status for wildlife connectivity as part of their routine culvert, bridge, and other asset inspections over time. For wildlife connectivity and WVC-reduction infrastructure, functionality is a distinct and necessary consideration alongside structural conditions. A structure may be physically sound yet no longer serves its intended purpose if it is blocked, undersized, improperly aligned with surrounding habitat, or disconnected from associated features.
(c) ***Coordination with Statewide Wildlife Prioritization Efforts:*** Inventory and functionality assessments should be informed by collaboration with California Department of Fish and Wildlife (CDFW) statewide mapping, wildlife–vehicle collision data, and connectivity prioritization efforts already underway. Leveraging existing, science-based datasets would improve risk identification, reduce duplicative data collection, and strengthen the performance-based foundation of the TAMP.

Without a clear, comprehensive inventory and basic functionality assessment, Caltrans cannot reasonably evaluate system performance, risk exposure, or future investment needs related to wildlife connectivity and WVC reduction. Incorporating these elements into Chapter 2 would mirror the treatment of other asset classes and support a more coherent, fiscally responsible approach to asset stewardship.

3. Wildlife Connectivity Performance Measures and Targets for Infrastructure

[9] *See ref,* SHC 158 wildlife passage features means culverts, underpasses, overpasses, bridges, directional fencing, barrier breaks, wildlife monitoring devices or detection systems, elevated highway segments, or other features, supported by a functional or potentially functional ecological buffer of habitat on multiple approaches to a highway that encourage use of the feature and are designed to be managed or restored using the best available science to improve the ability of wildlife to safely traverse transportation infrastructure.

Within asset-specific chapters, particularly those addressing pavements, bridges, drainage, and TMS features, we recommend that the TAMP incorporate functional considerations related to wildlife movement and WVC risk where they may affect safety outcomes, system resilience, lifecycle performance, or state conservation priorities. Integrating these considerations would allow performance discussions to more fully capture whether assets are functioning as intended within the broader transportation and environmental context in which they operate.

For linear transportation infrastructure, asset performance is not determined solely by physical condition, but also by how assets interact with surrounding landscapes and species movement patterns. Assets that are structurally sound may nonetheless contribute to elevated collision risk, increased maintenance costs, or reduced resilience if they function as movement barriers, funnel wildlife into travel lanes, or fail under changing hydrologic or climatic conditions.

Examples of functional performance considerations that could be incorporated within existing asset chapters include, but are not limited to:

(a) Pavement:

(i) Whether lane widths, shoulders, medians, and median barriers influence wildlife movement patterns or WVC risk, particularly in areas with documented collision hotspots.

(b) ***Bridges:***

(i) Whether bridges function as effective wildlife passage points or, conversely, as movement barriers due to span length, clearance, substrate conditions, or alignment with surrounding habitat.

(ii) Whether bridge retrofits or replacements maintain or improve landscape permeability, particularly in areas with known wildlife movement or collision risk.

(iii) Whether bridge designs that accommodate both hydrologic flows and wildlife movement enhance asset resilience and reduce long-term risk of roadway damage, emergency repairs, or collision-related costs.

(c) Drainage Assets

(i) Whether culverts and drainage structures are sized, aligned, and designed to function as both hydrologic conveyance and wildlife movement pathways where appropriate, or whether undersized or perched structures contribute to habitat fragmentation, collision risk, or asset failure.

(ii) Whether drainage assets designed for historic flow regimes remain functional under projected climate conditions, including increased peak flows that may alter wildlife movement patterns or compromise asset performance.

(iii) Whether sediment accumulation, outlet erosion, or structural deterioration reduces both hydrologic and ecological function over time, increasing maintenance demands and safety risks.

(d) Transportation Management Systems (TMS)

(i) Whether wildlife detection systems, dynamic signage, and other operational tools are deployed in locations with persistent or emerging wildlife–vehicle collision risk.

(ii) Whether TMS features are evaluated based on functional effectiveness in reducing collisions and improving safety outcomes.
(iii) Whether collision data and wildlife movement information are used to adaptively manage TMS deployments over time as conditions change.

Including these considerations would support that performance discussions reflect not only asset condition, but also whether assets are performing as intended under current and future conditions.

To ensure these considerations meaningfully inform decision-making, the TAMP should establish performance targets within the pavement, bridge, drainage, and TMS asset chapters to achieve broader connectivity objectives statewide. For example, the TAMP could explicitly commit to at least partial remediation of the top twelve Wildlife Connectivity Barriers[10] on the National and State Highway Systems in the next ten years. Alternatively, rather than setting a quantitative target at this stage, the TAMP could commit to a collaborative process between Caltrans, CDFW, and relevant NGOs to identify, prioritize, and advance remediation of the most consequential wildlife movement barriers on the National and State Highway Systems. This approach would allow performance targets, whether framed around statewide priorities (e.g., the top 12 CDFW barriers) or regionally identified barriers, to be negotiated and refined over time based on funding availability, cost estimates, and the appropriate division of implementation responsibility.

Framing performance targets as an iterative outcome of interagency collaboration would provide flexibility while still signaling institutional commitment and would ensure future TAMP updates are grounded in shared data, feasibility, and demonstrated effectiveness in improving safety, resilience, and system performance.

4. Wildlife Connectivity and WVC-Reduction Infrastructure Lifecycle Stewardship

Wildlife connectivity and WVC-reduction infrastructure should be explicitly included within this lifecycle planning approach to ensure that assets designed to deliver safety and/or connectivity benefits continue to function over time. Integrating wildlife passage and wildlife-vehicle collision reduction infrastructure into routine maintenance, preservation, and replacement planning would allow Caltrans to manage these assets proactively across their lifecycle.

Functional performance of wildlife crossings and associated infrastructure can degrade due to blocked or eroded entrances, damaged or misaligned fencing, sediment accumulation, vegetation overgrowth, or changes in surrounding land use that reduce effectiveness even when the structure remains structurally sound. These function-specific degradation pathways have direct implications for safety outcomes, system performance, and lifecycle costs.

We recommend that Chapter 4 explicitly incorporate wildlife connectivity and WVC-reduction infrastructure —such as wildlife overcrossings and undercrossings, adapted bridges and culverts, fencing,

[10] *See* Terrestrial Wildlife Connectivity Barriers, California Dep't of Fish & Wildlife, https://wildlife.ca.gov/Conservation/Wildlife/Connectivity/Barriers (last visited Feb 2, 2026).

and jump-outs—into life cycle planning and LCCA considerations. This would allow Caltrans to account for the distinct maintenance needs, treatment types, and deterioration patterns in its modeling approach as well as evaluate the cost-effectiveness of timely maintenance and rehabilitation relative to reactive repairs or asset failure.

Integrating wildlife connectivity and WVC-reduction infrastructure into LCP would be consistent with the TAMP's stated principle that proactive, well-timed investments improve asset condition and reduce long-term costs, while ensuring that infrastructure intended to deliver safety and connectivity benefits continues to perform as designed throughout its service life.

5. Additional Policy Considerations for Incorporating Wildlife Connectivity into Projects

Caltrans should encourage stronger alignment across its planning and investment programs to advance wildlife connectivity and WVC-reduction infrastructure. Consistently recognizing wildlife connectivity, WVC-reduction, habitat restoration, and climate resilience as legitimate asset improvements within capital programming criteria would help ensure that planning priorities translate into implementation.

Conclusion

The Draft 2026 Transportation Asset Management Plan provides an important foundation for performance-based stewardship of California's transportation system. However, the absence of wildlife connectivity and WVC-reduction infrastructure from the asset management framework limits the TAMP's ability to fully address known safety risks, system vulnerabilities, and long-term lifecycle costs. Recognizing wildlife connectivity infrastructure as transportation assets and incorporating functional performance and lifecycle considerations within existing TAMP frameworks would strengthen the Plan without requiring new programs or mandates. Doing so would align state transportation and conservation priorities to improve habitat connectivity, reduce wildlife-vehicle collisions, and build and steward cost-effective climate-resilient infrastructure.

We appreciate the opportunity to comment and look forward to continued engagement as the TAMP is refined and implemented.

Sincerely,

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