Re: Adding Necessary Wildlife Overpasses to Brightline West High-Speed Rail Project

Dear Administrator Bose:

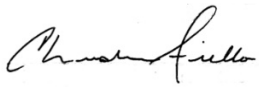
It has come to our attention that the FRA will re-evaluate the NEPA environmental review associated with Brightline West's Las Vegas to Apple Valley segment and has stated that "*the NEPA re-evaluation also includes revisions to the project's mitigation measures. In updating the re-evaluation, FRA would consider new information provided by the State of California (e.g. CDFW, Caltrans, etc.) and federal partners (e.g. NPS, BLM, etc.) regarding effects to wildlife and wildlife movement and currently proposed mitigation measures for wildlife and wildlife movement."* We are encouraged and supportive of this re-evaluation and wish to add our voices to the long list of organizations that support modifying the project to include wildlife overpasses to mitigate impacts to local wildlife.

The signees have collectively participated in multiple decades of collaborative research with California Department of Fish and Wildlife, National Park Service, Caltrans and Bureau of Land Management to assist in managing wildlife populations for long-term persistence. These efforts have produced extensive evidence that the high speed rail (HSR) would prevent at-grade crossings by desert bighorn sheep and stands to directly conflict with state and federal-level initiatives to preserve wildlife connectivity. Much of the now-available research and data did not exist at the time of the initial NEPA evaluation. Existing underpass structures do not facilitate bighorn sheep movement under I-15; at-grade crossings maintain the last links of crucial connectivity between populations across the highway. It is our strongest recommendation that overpasses are included in the HSR mitigation to facilitate movements by wildlife.

The permanence and scale of the HSR would create lasting impacts to bighorn sheep populations, and these impacts will extend well beyond the right of way. On the basis of decades of research that we have conducted on populations of desert bighorn sheep likely to be affected by the HSR, we anticipate the project will reduce current levels of gene flow between populations, which will have negative implications for genetic diversity. The HSR will eliminate access to habitat, which will impact the ability of bighorn sheep to respond to the effects of environmental stressors such as climate change, drought, or continued habitat loss and degradation from other human activities. Moreover, the HSR will limit the ability of bighorn sheep to recolonize vacant habitat, or to rescue declining populations with new migrants—both of which are key processes for maintaining functional desert bighorn sheep populations on this landscape. California is home to the largest collection of naturally-persisting desert bighorn populations in North America. The loss of any of these populations as a result of anthropogenic activities carried out in the absence of appropriate mitigation would substantially impact the natural history and local adaptations of this species in desert environments.

The good news is that research also shows that these adverse effects can be avoided. Indeed, overpass structures have proven to be effective mitigation tools. Our colleagues in Arizona and Nevada have demonstrated that overpasses allow for safe movement of bighorn sheep and other wildlife. These states also benefit from safer roadways for human travelers, which should also be a concern with traffic volumes predicted to increase along the I-15 corridor. We therefore encourage the FRA to take into account the large body of existing science on the issue and ensure that wildlife overpasses are included in the project's mitigation plan. Thank you for your time, and please reach out if you need further details regarding the available research supporting our evaluation and recommendations.

Sincerely,



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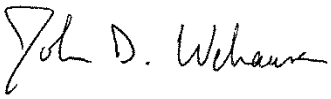

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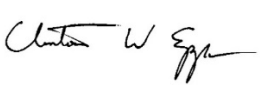

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