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From: Donaldson, Hailey@Wildlife
Sent: Thursday, September 10, 2026 7:12 AM
To: jcritchfield@acusd.org
Cc: Wood, Dylan@Wildlife; Wildlife R2 CEQA; Sheya, Tanya@Wildlife; Kilgour, Morgan@Wildlife
Subject: CDFW Comments on the Amador County Unified School District Consolidation Program MND - SCH: 2026081109

Dear Jared Critchfield:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Intent to Adopt an MND from Amador County Unified School District for the Amador County Unified School District Consolidation Program (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, native plants, and their habitat. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise 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. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, 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 may also act 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. To the extent implementation of the 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.

PROJECT DESCRIPTION SUMMARY

The Project site is located at the following locations in the table with their associated Assessor's Parcel Numbers (APNs):

Project Location	Address	Latitude	Longitude	APN(s)
Argonaut High School	501 Argonaut Lane Jackson CA 95642	38.35591	-120.79200	044-100-009
Amador High School	330 Spanish Street, Sutter Creek, CA 95685	38.39757	-120.81015	018-020-029; 018-020-030
Jackson Junior High School	747 Sutter Street, Jackson, CA 95642	38.35264	-120.77910	020-161-001; 020-150-009
lone Junior High School	450 South Mills Street, lone, CA 95640	38.34810	-120.93568	005-130-007; 004-250-001; 004-250-004; 004-220-016

The Project consists of the following modifications to the four (4) schools below:

Argonaut High School: Primarily interior modifications.

Amador High School: relocating two (2) existing portable classrooms currently on the Amador High School campus to Jackson Junior High School. This may require minor asphalt improvements.

Jackson Junior High School: Addition of two (2) portable classrooms being accepted from Amador High School. The two classrooms will be placed at the southern portion of the school.

lone Junior High School: Construction of up to 4 new classrooms with a footprint of approximately 4,500 square feet at northern portion of campus, Removal of 4 trees, installation of a new playground, and grading and construction of a new pick-up/drop-off loop on the eastern portion of the campus.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Amador County Unified School District in adequately identifying and, where appropriate, mitigating the Project'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 document. Based on the potential for the Project to have a significant impact on biological resources, CDFW concludes that a Mitigated Negative Declaration is appropriate for the Project.

CDFW is primarily concerned with the project impacts to rare plant species, nesting birds, and mature trees.

COMMENT 1: Biological Resources, lone Junior High School Campus Improvements, page 67

Issue:

The MND does not include a survey measure for rare or special-status plants which may be present on the campuses. CDFW is concerned that impacts to rare plant species cannot be ruled out without having first conducted surveys to confirm absence of the species where it is has potential to be present where ground disturbing activities are planned.

CDFW recommends conducting a survey for rare plant species in accordance with the CNRA & CDFW 2018 protocol. The survey(s) should be conducted at each campus where a specific plant is likely to occur during the blooming season prior to the initiation of construction. CDFW recommends conducting rare plant surveys during the blooming period of the plant species, identified below which has the potential to be present at Lone Junior High School according to the California Natural Diversity Database (CNDDDB).

- Stanislaus monkeyflower (*Erythraea marmorata*) – blooms March through May

The Stanislaus monkeyflower is an annual, native plant, with a rare plant rank of 1.B1 distinguishing it as a rare plant throughout its range with a high degree of immediacy of threat. Further impacts to the few remaining populations of this species may further jeopardize its existence; therefore, conducting a rare plant survey where construction and ground disturbing activities are planned to occur is strongly encouraged and may assist in reducing impacts to this species to a less than significant level.

Recommendation or Recommended Mitigation Measure:

CDFW recommends conducting a one-time preconstruction survey in accordance with an established rare plant survey protocol, such as the 2018 *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://wildlife.ca.gov/Conservation/Survey-Protocols>). The preconstruction survey is intended to identify rare plants that may occur within the Project Area or otherwise be impacted by Project Activities. In addition, drought and other adverse conditions may mean that some plant taxa will not be evident or identifiable this year. This may be particularly true for annual and short-lived perennial plant taxa and plants with persistent long-lived seed banks that are known not to germinate every year.

To make the most out of this field season CDFW recommends that:

- Botanical surveys be floristic in nature (every plant taxon that occurs on a site is identified to the taxonomic level necessary to determine rarity and listing status);
- Surveys be conducted in the field at the time of year when target plant taxa are both evident and identifiable (usually during flowering or fruiting), and multiple visits to a site be made (e.g. in early, mid, and late-season) to accurately survey the floristic diversity of the site and detect the presence of all special status plant taxa that are evident and identifiable;

In addition, CDFW recommends that nearby reference populations be visited whenever possible to determine if known special status plant populations are evident and identifiable this year, and to obtain a visual image of the target species, associated habitat, and associated natural community. Reference populations may be particularly important this

year to ensure that the timing of surveys is appropriate and to help substantiate negative findings in adverse conditions caused by drought.

If a plant listed under CESA is identified during surveys, Project Proponent must cease project activities until CDFW has been consulted and either determines that it is possible to fully avoid the species through implementation of a buffer distance, or the Permittee can demonstrate compliance with CESA.

COMMENT 2: Biological Resources, Lone Junior HS Campus Improvements, page 68

Issue:

Mitigation Measure BIO-1 states that if a nest is found, the qualified biologist will establish an appropriate buffer distance based on site conditions. CDFW appreciates the District's commitment to the survey measure, plan to monitor the nest, and the reasoning for this buffer distance. However, the measure does not include language to aid the Project Proponent in what to do if a lapse in project activities occurs. CDFW recommends the following language be included in BIO-1 to help reduce impacts to a less than significant level under CEQA and comply with Fish and Game Code Sections 3503, 3503.5, and 3513.

Recommendation or Recommended Mitigation Measure:

Project Delay. If a lapse in project-related work of fourteen (14) calendar days or longer occurs, the qualified biologist shall complete another focused nesting survey before Project work can be reinitiated.

COMMENT 3: Biological Resources, Lone Junior HS Campus Improvements, page 76

Issue:

While the four mature oak trees located at the southeastern corner of Lone Junior High School posed for removal do not meet the requirements of a heritage or historical oak tree and oaks provide a significant value for native wildlife habitat.

The MND notes that several bats, including pallid bat (*Antrozous pallidus*) and Townsend's big-eared bat (*Corynorhinus townsendii*) have a medium to low likelihood of utilizing the habitat within and in the vicinity of Lone Junior High School (MND Page 68). While bats are already addressed through the habitat assessment and surveys measures provided in BIO-2. Studies suggest that bats select roost sites in trees with DBH as low as 6.6 inches (Brigham et al. 1997) therefore, removal of trees within the Project Area as planned by the Project Proponent will reduce the availability of roosting habitat for bats as well as other local species, which may be considered a significant impact to biological resources if not mitigated for.

Recommendation or Recommended Mitigation Measure:

CDFW generally considers trees with a DBH of 4 inches or greater to be mature, and important contributors to the ecological value of the habitat and canopy cover in the environment. As such, CDFW recommends replanting all trees removed with a DBH greater than 4 inches at a minimum 3:1 ratio. Replacement trees should be of native origin and to the extent feasible, trees should be planted on-site. If on-site mitigation is not feasible, in-kind mitigation can be considered for an alternate location, or a donation to a local tree

mitigation program or conservation fund could also be provided. CDFW also recommends that a qualified biologist supervise vegetation removal to ensure compliance with mitigation requirements and avoid impacting wildlife during the removal.

COMMENT 4: Biological Resources, Amador HS and Jackson Junior HS Campus Improvements, page 75

Issue:

CDFW concurs with the Mitigation Measures BIO-1 and BIO-2 which outlines the precautions taken to reduce impacts to potentially nesting birds and roosting bats; however, notes that the measures are only applied to the work at Lone Junior High School. CDFW is concerned that the project activities at the other sites including the relocation of the annex buildings could pose a disturbance to nesting birds and roosting bats.

The project description includes the proposed relocation of two (2) annex buildings/classrooms from Amador High School to Jackson Junior High School. Disturbance from large construction equipment passing by or being staged near suitable nesting bird habitat can significantly disturb nesting bird behaviors during the courting, nest building, and incubating stages. Additionally, the two (2) annex buildings/classrooms may have exterior crevices, roof voids, or other elements that may be potential bird nesting or bat roosting habitat. CDFW recommends a minor adjustment to the MND that specifies that both mitigation measure BIO-1 and BIO-2 be applied to work at both Amador High School and Jackson Junior High School.

Recommendation or Recommended Mitigation Measure:

CDFW recommends a minor adjustment to the MND that specifies that both mitigation measure BIO-1 and BIO-2 be applied to work at both Amador High School and Jackson Junior High School to assist in reducing impacts to potentially nesting birds and/or roosting bats.

Prior to introducing heavy machinery to each Project Site, CDFW recommends the qualified biologist survey potential nesting trees within 500-feet for birds and within ¼ mile of the proposed route that the heavy equipment will travel to each site within the bounds of each school.

Prior to transporting the annex buildings/classrooms, CDFW recommends the qualified biologist inspect each building for suitable habitat or sign of nesting birds, or roosting bats (i.e., presence of guano whitewash, or feathers).

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 Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be

submitted online or mailed electronically to CNDDDB at the following email address:
CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 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

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the MND for the Amador County Unified School District Consolidation Program Project to assist Amador County Unified School District in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Hailey Donaldson, Environmental Scientist at (916) 216-6253 or hailey.donaldson@wildlife.ca.gov.

Sincerely,

Hailey Donaldson

Environmental Scientist
Habitat Conservation – Region 2
1701 Nimbus Rd.
Rancho Cordova, CA 95670
Work Cell: (916) 216-6253



REFERENCES

Bringham M.R., M.J. Vonhof, R.M. Barclay, and J.C. Gwilliam. (1997) Roosting Behavior and Roost-site Preference of Forest-Dwelling California Bats (*Myotis californicus*). *Journal of Mammalogy*. 78(4): 1231-1239.

California Department of Fish and Wildlife. (2018). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.
<https://nrm.dfg.ca.gov>