

Haggerty, Nicole@Wildlife

From: Donaldson, Hailey@Wildlife
Sent: Tuesday, March 11, 2025 3:31 PM
To: mflandreau@calaverascounty.gov
Cc: Wood, Dylan@Wildlife; Wildlife R2 CEQA; Sheya, Tanya@Wildlife; Kilgour, Morgan@Wildlife
Subject: CDFW Comments on the MND for the Administrative Use Permit for New Cingular Wireless PCS Project (SCH# 2025020772)

Dear Madeline Flandreau:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Intent to Adopt an MND from County of Calaveras Department of Planning for the Administrative Use Permit for New Cingular Wireless PCS (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.^[1]

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.

PROJECT DESCRIPTION SUMMARY

The Project site is in the county of Calaveras; Latitude: 38.20464, Longitude: -120.94641 (WGS 84 datum, decimal degrees); 10039 Camanche Parkway, Wallace CA 95254; Assessor's Parcel Number [APN] 048-018-014.

The Project consists of the installation of a new 125-foot stealth mono-elm with twelve (12) antennas, an emergency back-up generator, and associated small equipment. All facility equipment will be contained within a 40 foot by 30 foot fenced lease area.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist County of Calaveras Department of Planning in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on

the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, CDFW concludes that a Mitigated Negative Declaration is appropriate for the Project. CDFW is primarily concerned with the potential project impacts to the California tiger salamander, a species listed as *threatened* under the California Endangered Species Act

COMMENT: Additional Threatened Species Measures

Issue: California tiger salamander (*Ambystoma californiense*) central California Distinct Population Segment (DPS) is both federally and state listed as *threatened*, and multiple observations have been recorded in California Natural Diversity Database (CNDDDB) from the surrounding project area, including an observation that is less than 0.5 miles away from the project area. *A. californiense* are known to leave pools and migrate upland after egg laying. On average, individuals travel approximately 1.16 miles, and in some cases up to 1.5 miles (Searcy & Shaffer, 2011) to use small mammal burrows (Loredo et al. 1996) where they continue to emerge at night, when humidity is high, to feed for the next two months following breeding season (Stebbins & McGinnis, 2012). Typically, breeding and migration occur from November 1 – April 30. While project activities are located 3 miles northwest of the area designated by U.S. Fish and Wildlife Service as Critical Habitat, it is within 0.5 miles of *A. californiense* observations, and therefore the current mitigation measures included in the Initial Study may not mitigate project impacts to a less than significant level due to the close proximity of the project area to multiple pools raising the chance for potentially unrecorded populations to be present in the area, and the distance from the project area to the closest observance of *A. californiense* is less than its usual migration distance of 1.16 miles.

Recommendation or Recommended Mitigation Measure: CDFW recommends the additional avoidance measures:

1. A qualified biologist shall identify and flag all small mammal burrows and crevices within the project area which may act as potential upland habitat for *A. californiense*. Project personnel shall avoid all flagged all small mammal burrows and crevices within the project area.
2. All project activities and vehicle travel shall be restricted to the period between 30 minutes after sunrise and 30 minutes prior to sunset to the maximum extent feasible to avoid impacts to possibly migrating *A. californiense*.

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 Administrative Use Permit for the New Cingular Wireless PCS to assist Calaveras County Planning Department 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.

REFERENCES

- Loredo I., D. VanVuren, & M.L Morrison. (1996) Habitat use and migration behavior of the California tiger salamander. *Journal of Herpetology*. 30:282-285.
- Searcy C.A., & H.B. Shaffer. (2011) Determining migration distance of a vagile vernal pool specialist: how much land is required for conservation of California tiger salamanders? *Research and Recovery in vernal pool landscapes. Studies from the herbarium*. 16:73-87.
- Stebbins R.C., & S.M. McGinnis. (2012) Field Guide to the Amphibians and Reptiles of California. University of California Press., Berkeley, California USA.

Thank you,

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^[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.