

Plumas Lake Elementary School District

PLUMAS LAKE MIDDLE SCHOOL PROJECT

April 2026 | Final Environmental Impact Report

State Clearinghouse No. 2025060992



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for Plumas Lake Elementary School District

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1. INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA), as amended (Public Resources Code Sections 21000 et seq.), and the CEQA Guidelines (California Code of Regulations Sections 15000 et seq.).

According to the CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the lead agency.

This document contains responses to comments received on the Draft EIR for the Plumas Lake Middle School Project during the public review period, which began February 3, 2026, and closed March 20, 2026. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Plumas Lake Elementary School District. This document and the circulated Draft EIR comprise the Final EIR, in accordance with CEQA Guidelines Section 15132.

1.1 FINAL EIR ORGANIZATION

Chapter 1, Introduction. This chapter describes CEQA requirements and the content of this Final EIR.

Chapter 2, Response to Comments. This chapter provides a list of agencies commenting on the Draft EIR; comments received during the public review period; and responses to comments.

Chapter 3, Revisions to the Draft EIR. This chapter contains revisions to the Draft EIR as a result of the comments received by agencies, as described in Section 2, and/or errors and omissions discovered subsequent to release of the Draft EIR for public review.

1. INTRODUCTION

Plumas Lake Elementary School District staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the Draft EIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in CEQA Guidelines Section 15088.5.

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

Pursuant to CEQA Guidelines Section 15084, the Plumas Lake Elementary School District (District) determined that an EIR would be appropriate for the project and circulated a Notice of Preparation (NOP). The public review period for the NOP was from June 20, 2025, to July 21, 2025, pursuant to CEQA Guidelines Section 15082. Additionally, a public scoping meeting was held at the District Office on July 10, 2025, to present the proposed project, describe the EIR process, and receive public comments. Public notification of the Draft EIR was satisfied by sending the NOP to State and local agencies.

Additionally, copies of the NOP were made available for review at the following locations:

- Plumas Lake Elementary School District, 2743 Plumas School Road, Plumas Lake, CA 95961
- Plumas Lake Elementary School District website: <https://www.plusd.org/About-Us/Our-District/Facilities--Growth/index.html>

1.2.2 Draft Environmental Impact Report

Following the NOP, a Draft EIR was prepared in accordance with CEQA Guidelines Section 15084 and the California Code of Regulations, Title 14, Division 6, Chapter 3, Article 9. As the Lead Agency under CEQA Guidelines Section 21067, the District is required to evaluate and consider environmental consequences of a proposed project before approving projects within its discretionary authority. In compliance with CEQA Guidelines Sections 15126.2 and 15126.4, the Draft EIR identified potentially significant adverse impacts to agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards, transportation, tribal cultural resources, and wildfire. The proposed mitigation measures would reduce all impacts to less-than-significant levels, with the exception of agriculture and forestry resources, which remain significant and unavoidable. It was determined that the proposed project would have no impacts to mineral resources, and therefore, this topic

was scoped out of the Draft EIR. Furthermore, consistent with CEQA Guidelines Section 15126.6(a), the District analyzed a range of reasonable project alternatives and locations that could feasibly achieve the project's basic objectives while avoiding or substantially lessening significant environmental effects and evaluated the comparative merits of those alternatives.

1.2.3 Notice of Availability

Following the completion of the Draft EIR, the District issued a Notice of Availability (NOA) on February 3, 2026, in compliance with Public Resources Code Section 21165 and CEQA Guidelines Section 15087, to notify the public and federal, State, and local agencies that the Draft EIR was available for public comment for 45 days, between February 3, 2026, and March 20, 2026. Public notification of the Draft EIR was satisfied by sending the NOA to State and local agencies.

The Draft EIR and NOA for the proposed project were available for public review at:

- Plumas Lake Elementary School District, 2743 Plumas School Road, Plumas Lake, CA 95961
- Plumas Lake Elementary School District website: <https://www.plusd.org/About-Us/Our-District/Facilities--Growth/index.html>
- The NOA was also published in the local newspaper, *Appeal Democrat*.

1. INTRODUCTION

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2. RESPONSE TO COMMENTS

Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the lead agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft Environmental Impact Report (EIR) and to prepare written responses.

This chapter provides all comments received on the Draft EIR and the lead agency's responses to each comment. Comment letters and specific comments are given letters and numbers for reference purposes.

2.1 LIST OF COMMENTERS

Table 2-1, *List of Commenters*, lists the agencies and individuals that provided comments on the Draft EIR during the public review period.

Table 2-1 List of Commenters

Number Reference	Commenter	Date of Comment
Agencies		
A1	California Department of Conservation Geologic Energy Management Division, Mary Soe, Supervising Oil and Gas Engineer	February 5, 2026
A2	California Department of Conservation Division of Land Resource Protection, Monique Wilber, Conservation Program Support Supervisor	March 9, 2026
A3	California Department of Transportation, District 3, Satwinder Dhatt, Local Development Review Lead	March 10, 2026
Letters Received Prior to Commencement of Public Review		
	Cynthia Fan	February 2, 2026

Comments received prior to the commencement of the public review period were considered in the preparation of this Draft EIR.

2. RESPONSE TO COMMENTS

2.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments and reminds persons and public agencies that the focus of review of and comment on draft EIRs should be

. . . on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. . . . CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

The CEQA Guidelines further advises:

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence (Sec. 15204[c]).

Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility (Sec. 15204[d]).

This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section (Sec. 15204[e]).

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be provided to those agencies at least 10 days prior to certifying the EIR.

2.3 COMMENTS AND RESPONSES

This section includes a reproduction of and response to each comment received during the public review period for the Draft EIR. Comments are presented in their original form in Appendix A, *Early and Public Review Period Comment Letters*, and annotated to identify each comment number.

Responses to individual comments are provided in this chapter following the text of each corresponding comment. Comments are arranged by category, date received, and name. Categories and their corresponding abbreviations are:

- Agencies (A)

2. RESPONSE TO COMMENTS

2.3.1 Comments from Agencies

A1. California Geologic Energy Management Division, February 5, 2026

Comment A1-1

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated 1/30/2026. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (<https://maps.conservation.ca.gov/doggr/wellfinder/>).

Response A1-1

As mentioned on page 3.9-12 of Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, the Geological and Environmental Hazards Assessment (GEHA) prepared for the project site did not identify an active oil or natural gas well within 300 feet of the project site. Further, the Draft EIR states that the closest well is approximately 890 feet southwest of the project site and is identified as a dry hole drilled by D.D. Feldman Oil & Gas. In addition, based on California Geologic Energy Management Division (CalGEM)'s Well Finder database, the project site does not contain any active plugged, or idle oil, gas, or geothermal wells. Additionally, the enclosure included in Commenter Letter A1 indicates that "there are no wells in the project area."

The Draft EIR addresses CalGEM comments. The commenter does not bring up any inadequacies within the Draft EIR. Therefore, no revisions are required.

Comment A1-2

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's

2. RESPONSE TO COMMENTS

expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1729 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

Response A1-2

See Response to Comment A1-1.

Comment A1-3

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

2. RESPONSE TO COMMENTS

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link:

https://www.conservation.ca.gov/calgem/for_operators.

Response A1-3

See Response to Comment A1-1.

2. RESPONSE TO COMMENTS

Comment A1-4

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

Response A1-4

See Response to Comment A1-1.

Comment A1-5

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

Response A1-5

See Response to Comment A1-1.

Comment A1-6

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal

2. RESPONSE TO COMMENTS

penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues. Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at 916-322-1110 or via email at CalGemNorthern@conservation.ca.gov.

Response A1-6

See Response to Comment A1-1.

Comment A1-7

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded; "There are no wells in the project area."

Response A1-7

See Response to Comment A1-1.

A2. California Department of Conservation Division of Land Resource Protection, March 9, 2026.

Comment A2-1

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report for the Plumas Lake Middle School Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents.

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

Project Attributes

The proposed project would consist of two main components, which would include the construction of the Plumas Lake Middle School and an access road connecting to River Oaks Boulevard to serve the school. The Project site contains Prime Farmland as designated by DOC's Farmland Mapping and Monitoring Program.

Response A2-1

The District appreciates the Division of Land Resource Protection's review of and comments on the Draft EIR. The comments regarding potential impacts on agricultural land resources are acknowledged. Responses to the specific issues raised by the Division of Land Resource Protection are provided in Responses A2-2 through A2-9 below.

2. RESPONSE TO COMMENTS

Comment A2-2

Project Considerations

The conversion of agricultural land represents a permanent reduction and impact to California's agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.

Response A2-2

This information is provided on page 3.2-9 in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR. Implementation of the proposed project would result in the direct conversion of approximately 25 acres of Prime Farmland to non-agricultural use at the project site.

Comment A2-3

Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.

Response A2-3

Impact 3.2 (e) on page 3.2-11 in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR evaluates whether the proposed project would involve other changes in the existing environment that could result in the conversion of farmland into non-agricultural use.

As described in the Draft EIR, the properties to the immediate north and across River Oaks Boulevard to the east are developed with residential uses. The property to the immediate east of the project site contains fallow agricultural land. The properties to the immediate south and west of the project site are used for agricultural purposes. The District is proposing to place buildings along the eastern portion of the project site, and athletic fields and tennis/pickleball courts along the western and southern portions of the project site; an undeveloped area along the southern boundary would be maintained. The athletic facilities would function as a transition between the agricultural operations to the west and south, and the school buildings on the eastern portion of the project site would be compatible with the residential uses further east of the project site, past the adjacent eastern parcel of fallow agricultural land. The project site is within the Plumas Lake Specific Plan, and this Specific Plan functions as a transitional area between urban development to the north and agricultural uses to the south. The Plumas Lake Specific Plan uses detailed planning regulations to guide growth and reduce land use conflicts.

2. RESPONSE TO COMMENTS

In addition, agricultural activities on the project site ceased between 2022 and 2023. As such, the proposed project would not result in the loss of agricultural support infrastructure at the project site, as the project site is currently fallow. Land values and property taxes are not environmental issues, and therefore they are not addressed under CEQA nor analyzed in the Draft EIR.

Additionally, as indicated in Table 3.11-2, *Proposed Project Consistency Analysis with the General Plan Policies*, on page 3.11-8, and Table 3.11-3, *Proposed Project Consistency Analysis with the Plumas Lake Specific Plan*, on page 3.11-10, in Section 3.11, *Land Use and Planning*, of the Draft EIR, the project site contains fallow agricultural land which is currently underutilized and located near urban development. The proposed project would provide an essential community service by locating a middle school in a central location within Plumas Lake. Also, the proposed project would implement best management practices including bioretention and detention facilities in the southern portion of the project site (see Figure 2-7, *Stormwater Control Plan*, on page 2-21 in Chapter 2, *Project Description*, of the Draft EIR) which would help minimize potential effects on nearby agricultural uses. The proposed project would not impose any requirements on existing agricultural operations and is consistent with the buffering intent of the Plumas Lake Specific Plan.

Comment A2-4

- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.

Response A2-4

As mentioned under Section 3.2.5, *Cumulative Impact Analysis*, on page 3.2-13 in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR, implementation of the proposed project, in combination with other past, present, and reasonably foreseeable projects in the region, would contribute to the cumulative loss of Prime Farmland in the region to non-agricultural use. The gradual transition from agricultural uses to urban uses is envisioned as part of the Yuba County 2030 General Plan and Plumas Lake Specific Plan which designate large portions of farmland for residential, commercial, and public facility development.

The proposed project, along with other developments in the Plumas Lake area and the broader Valley Growth Boundary, aligns with the County's long-term growth strategy to convert farmland to urban uses. However, this conversion presents a significant adverse effect on the region's agricultural land base, as it represents a permanent loss of Prime Farmland that cannot be fully mitigated. When evaluated alongside other regional projects that similarly impact important farmland, the proposed project would make a cumulatively considerable contribution to significant cumulative impacts associated with the loss of agricultural land.

2. RESPONSE TO COMMENTS

Comment A2-5

- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.

Response A2-5

As mentioned on page 3.2-4 in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR, the Land Use Diagram for the Plumas Lake Specific Plan shows a buffer strip along the entire western edge of the Plan south of the currently unnamed extension of Plumas-Arboga Road. This buffer strip is defined as having a minimum dimension of 300 feet in width and may be interpreted as either lesser or greater depending upon individual circumstances such as crop type, prevailing winds, and the presence of other mitigating features such as screening. The project site is not within this buffer strip.

As mentioned in Impact 3.2(e) on page 3.2-12 in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR, policies in the Natural Resources Element aim to reduce conflicts between new developments and existing agricultural operations through design measures like agricultural buffers (Policy NR3.4) and appropriate transitions between rural and urban areas (Policy NR3.5 and Policy NR3.6). The proposed project places athletics fields on the western and southern sides of the project site, and would maintain an undeveloped area on the southern side of the project site. These low intensity uses act as a transition between surrounding agricultural uses and residential development, aligning with these policies. Accordingly, the proposed project would not conflict with the implementation of applicable agricultural mitigation plans, programs, or policies.

Comment A2-6

- Proposed mitigation measures for impacted agricultural lands within the proposed project area.

Response A2-6

A discussion of mitigation measures considered but rejected starts on page 3.2-9 in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR. No feasible mitigation measures are available to reduce the proposed project's impacts on agricultural resources to less than significant, but the payment of agricultural land conservation mitigation funding, creation of an agricultural conservation easement, and relocation of Prime Farmland topsoil were considered.

2. RESPONSE TO COMMENTS

Comment A2-7

Mitigating Agricultural Land Loss or Conversion

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”]; see also *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project’s surrounding area. A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at: California Council of Land Trusts.

Response A2-7

See response to comment A2-6.

Payment of an agricultural land conservation mitigation funding requires the District to contribute mitigation funds to offset the permanent removal of Prime Farmland. However, the County General Plan and County Ordinance Code do not identify a county program to establish a funding mechanism for agricultural land preservation. Nonprofits in the area do not provide a mitigation funding program, and therefore, there is no mechanism for the District to contribute funds, making this mitigation measure infeasible.

Creation of an agricultural conservation easement requires the District to purchase a property of equal size with a Prime Farmland designation to create an easement at a one-to-one replacement ratio. However, the County General Plan and County Ordinance Code do not identify a county program to establish a conservation easement. While nonprofits in the area can help, establishing such an easement is deemed infeasible due to the project site being developed as a school. The District would need to purchase property of the same size to create an easement, and there are limited properties available that meet the necessary criteria. Consequently, the creation of an easement would not effectively mitigate the net loss of Prime

2. RESPONSE TO COMMENTS

Farmland resulting from the proposed project, as the proposed project would still result in a net loss of Prime Farmland.

Comment A2-8

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

Response A2-8

The Draft EIR also evaluated alternative mitigation measures beyond conservation easements. As described on page 3.2-11, in Section 3.2, *Agriculture and Forestry Resources*, of the Draft EIR, one such measure included the relocation of Prime Farmland topsoil, which would involve removing the upper 12 to 18 inches of topsoil from the project site and hauling it to farms with lower-quality soils to improve crop productivity. However, implementation of this measure would result in significant environmental effects, including increased truck traffic, diesel emissions, construction noise, and an extended construction schedule. In addition, relocating Prime Farmland soil to another active farm would exacerbate other environmental impacts. Due to these considerations, this mitigation measure was determined to be infeasible.

Comment A2-9

Thank you for giving us the opportunity to comment on the Draft Environmental Impact Report for the Plumas Lake Middle School Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

Response A2-9

The District appreciates the Division of Land Resource Protection's review of the Draft EIR and its comments on the proposed project. The Division of Land Resource Protection will be included on the distribution list for future notices and documents related to the environmental review process for the project.

A3. California Department of Transportation, District 3, March 10, 2026

Comment A3-1

Thank you for including the California Department of Transportation (Caltrans) in the review process for Plumas Lake Middle School Project. We wanted to reach out and let you know that we have no comments at this time.

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Should you have questions please contact me, Local Development Review and System Planning Coordinator, by phone (530) 821-8261 or via email at D3.local.development@dot.ca.gov.

Response A3-1

The District appreciates Caltrans' review of the Draft EIR and its comments on the proposed project. Caltrans will be included on the distribution list for future notices and documents related to the environmental review process for the project.

2. RESPONSE TO COMMENTS

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3. REVISIONS TO THE DRAFT EIR

3.1 INTRODUCTION

This section contains revisions to the Draft Environmental Impact Report (EIR) in response to comments from agencies, organizations, and the public, as well as staff-directed changes. These text revisions include typographical corrections, insignificant modifications, and amplifications and clarifications of the Draft EIR. For each revision, the Draft EIR page and location on the page are identified, followed by the textual, tabular, or graphical revision.

Double underlined text represents language that has been added to the EIR; text with ~~striketrough~~ represents language that has been deleted from the Draft EIR. None of the revisions to the Draft EIR constitute significant new information, as defined in California Environmental Quality Act (CEQA) Guidelines Section 15088.5; therefore, the Draft EIR does not need to be recirculated.

3.2 DRAFT EIR REVISIONS

Revisions to Significant Impacts and Mitigation Measures

Mitigation Measure BIO-1 in Table ES-1, *Summary of Significant Impacts and Mitigation Measures*, in the Executive Summary Chapter of the Draft EIR, has been revised to fix a typographical error.

3. REVISIONS TO THE DRAFT EIR

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
BIOLOGICAL RESOURCES			
a) Would the project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	PS	<p>Mitigation Measure BIO-1: Special-Status Species. The following general measures minimize or avoid impacts on special-status species with the potential to occur within the project site and off-site improvement area:</p> <ul style="list-style-type: none"> ■ Prior to the start of construction and earthwork activities, the project applicant shall retain a qualified biologist on an as-needed basis to assist with potential biological issues that might arise during construction. Prior to the start of construction and earthwork activities, the qualified biologist shall walk the project site and off-site improvement area with the construction project manager and establish project impact limits and avoidance areas around identified biological resources. Impact limits define the areas where ground disturbing or project-related activities may occur. Avoidance areas are areas where project activities are not allowed. ■ Project impact limits shall be clearly demarcated prior to construction, and all workers shall be made aware of the impact limits and avoidance areas. No ground- or vegetation-disturbing activities shall occur outside of the project impact limits. All vehicles and equipment shall be restricted to the project impact limits or existing designated access roads and staging areas. 	LTS

3. REVISIONS TO THE DRAFT EIR

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		<ul style="list-style-type: none"> <li data-bbox="842 386 1673 881">■ Erosion control measures shall be placed <u>at the outer edge of the project impact limits</u> between avoided aquatic resources and the outer edge of the project impact limits prior to commencement of construction activities, and such measures shall be maintained until construction is completed and soils have stabilized. Plastic monofilament netting or similar material shall not be used for erosion control because smaller wildlife may become entangled or trapped in these materials; this includes products that use photodegradable or biodegradable synthetic netting, which can take several months to decompose. Acceptable materials to be used for erosion control include natural fibers such as jute, coconut, twine, or other similar fibers. <li data-bbox="842 946 1673 1401">■ A qualified biologist shall conduct mandatory worker environmental awareness training for all contractors, work crews, and any onsite personnel to aid workers in recognizing special-status species and sensitive biological resources that are known to occur or that have the potential to occur within the project site and offsite improvement area. This program shall identify the special-status species and their habitats, describe the regulatory status and general ecological characteristics of sensitive resources, and review the limits of construction, environmentally sensitive areas, measures required to reduce impacts to biological resources, and possible penalties for noncompliance. 	

3. REVISIONS TO THE DRAFT EIR

Table ES-1 Summary of Significant Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		<ul style="list-style-type: none"> ■ The qualified biologist shall periodically visit the construction site to confirm that construction work is occurring within the demarcated areas and that the proposed project impact limits and avoidance areas are maintained. The qualified biologist shall also determine if the impact limits and/or avoidance areas need to be adjusted. 	

PS = Potentially Significant; LTS = Less than Significant

Revisions to Other Text in the Draft EIR

SECTION 3.4, BIOLOGICAL RESOURCES

Draft EIR page 3.4-49

Mitigation Measure BIO-1 in Section 3.4, *Biological Resources*, on page 3.4-49 of the Draft EIR, has been revised to fix a typographical error.

Mitigation Measure BIO-1: Special-Status Species. The following general measures minimize or avoid impacts on special-status species with the potential to occur within the project site and off-site improvement area:

- Prior to the start of construction and earthwork activities, the project applicant shall retain a qualified biologist on an as-needed basis to assist with potential biological issues that might arise during construction. Prior to the start of construction and earthwork activities, the qualified biologist shall walk the project site and off-site improvement area with the construction project manager and establish project impact limits and avoidance areas around identified biological resources. Impact limits define the areas where ground disturbing or project-related activities may occur. Avoidance areas are areas where project activities are not allowed.
- Project impact limits shall be clearly demarcated prior to construction, and all workers shall be made aware of the impact limits and avoidance areas. No ground- or vegetation-disturbing activities shall occur outside of the project impact limits. All vehicles and equipment shall be restricted to the project impact limits or existing designated access roads and staging areas.
- Erosion control measures shall be placed at the outer edge of the project impact limits between avoided aquatic resources and ~~the outer edge of~~ the project impact limits prior to commencement of construction activities, and such measures shall be maintained until construction is completed and soils have stabilized. Plastic monofilament netting or similar material shall not be used for erosion control because smaller wildlife may become entangled or trapped in these materials; this includes products that use photodegradable or biodegradable synthetic netting, which can take several months to decompose. Acceptable materials to be used for erosion control include natural fibers such as jute, coconut, twine, or other similar fibers.
- A qualified biologist shall conduct mandatory worker environmental awareness training for all contractors, work crews, and any onsite personnel to aid workers in recognizing special-status species and sensitive biological resources that are known to occur or that have the

3. REVISIONS TO THE DRAFT EIR

potential to occur within the project site and offsite improvement area. This program shall identify the special-status species and their habitats, describe the regulatory status and general ecological characteristics of sensitive resources, and review the limits of construction, environmentally sensitive areas, measures required to reduce impacts to biological resources, and possible penalties for noncompliance.

- The qualified biologist shall periodically visit the construction site to confirm that construction work is occurring within the demarcated areas and that the proposed project impact limits and avoidance areas are maintained. The qualified biologist shall also determine if the impact limits and/or avoidance areas need to be adjusted.

APPENDIX A: Comment Letters





Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director
715 P Street, MS 1803
Sacramento, CA. 95814
T: (916) 445-5986

February 5, 2026

VIA EMAIL

Plumas Lake Elementary School District
Jeff Roberts
2743 Plumas School Rd, Plumas Lake, CA 95961
jroberts@plusd.org

Assessor Parcel Number(s): 016-350-021 and 016-350-022
Property Owner(s): N/A
Project Location Address: River Oaks Blvd & Kensington Dr

PROJECT TITLE: SCH2025060992 Plumas Lake Middle School Project

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

A1-1

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated 1/30/2026. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (<https://maps.conservation.ca.gov/doggr/wellfinder/>).

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as

A1-2

State of California Natural Resources Agency | Department of Conservation

Northern District

Orcutt Office and Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455 | T: (805) 937-7246 | F: (805) 937-0673
Sacramento Office and Mail: 715 P Street, MS 1804, Sacramento, CA 95814 | T: (916) 322-1110 | F: (916) 445-3319
Ventura Office: 1000 S. Hill Road, Suite 116, Ventura, CA 93003 | T: (805) 937-7246 | F: (805) 654-4765
Ventura Mail: 195 S. Broadway, Suite 101, Orcutt, CA 93455
conservation.ca.gov

2/5/2026

asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

A1-2

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

A1-3

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain

2/5/2026

all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

A1-3

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link:

https://www.conservation.ca.gov/calgem/for_operators.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section 1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

A1-4

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

A1-5

2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

A1-6

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at 916-322-1110 or via email at CalGemNorthern@conservation.ca.gov

2/5/2026

Sincerely,

May Soe

May Soe
Supervising Oil & Gas Engineer – Northern District – Sacramento

Enclosure

Cc: Malia Durand, PlaceWorks, mdurand@placeworks.com

2/5/2026

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

API No.	Well Name
There are no wells in the project area	

A1-7



MARCH 9, 2026

VIA EMAIL: JROBERTS@PLUSD.ORG

JEFF ROBERTS, SUPERINTENDENT, EDUCATIONAL SERVICES
PLUMAS LAKE ELEMENTARY SCHOOL DISTRICT
2743 PLUMAS SCHOOL ROAD
PLUMAS LAKE, CA 95961

Dear Mr. Roberts:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PLUMAS LAKE MIDDLE SCHOOL
PROJECT, SCH# 2025060992

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report for the Plumas Lake Middle School Project (Project).

The Division monitors and maps farmland conversion on a statewide basis, provides technical assistance regarding the Williamson Act, and administers various agricultural land conservation programs. Public Resources Code, section 614, subdivision (b) authorizes the Department to provide soil conservation advisory services to local governments, including review of CEQA documents.

Protection of the state's agricultural land resources is part of the Department's mission and central to many of its programs. The CEQA process gives the Department an opportunity to acknowledge the value of the resource, identify areas of Department interest, and offer information on how to assess potential impacts or mitigation opportunities.

The Department respects local decision-making by informing the CEQA process and is not taking a position or providing legal or policy interpretation.

We offer the following comments for consideration with respect to the project's potential impacts on agricultural land and resources within the Department's purview.

PROJECT ATTRIBUTES

The proposed project would consist of two main components, which would include the construction of the Plumas Lake Middle School and an access road connecting to River Oaks Boulevard to serve the school. The Project site contains Prime Farmland as designated by DOC's Farmland Mapping and Monitoring Program.

A2-1

PROJECT CONSIDERATIONS

The conversion of agricultural land represents a permanent reduction and impact to California’s agricultural land resources. The Department generally advises discussion of the following in any environmental review for the loss or conversion of agricultural land:

A2-2

- Type, amount, and location of farmland conversion resulting directly and indirectly from implementation of the proposed project.
- Impacts on any current and future agricultural operations in the vicinity; e.g., land-use conflicts, increases in land values and taxes, loss of agricultural support infrastructure such as processing facilities, etc.
- Incremental impacts leading to cumulative impacts on agricultural land. This would include impacts from the proposed project, as well as impacts from past, current, and likely future projects.
- Implementation of any City or County Agricultural Mitigation Plans, Programs, or Policies.
- Proposed mitigation measures for impacted agricultural lands within the proposed project area.

A2-3

A2-4

A2-5

A2-6

MITIGATING AGRICULTURAL LAND LOSS OR CONVERSION

Consistent with CEQA Guidelines, the Department advises that the environmental review address mitigation for the loss or conversion of agricultural land. An agricultural conservation easement is one potential method for mitigating loss or conversion of agricultural land. (See Cal. Code Regs., tit. 14, § 15370 [mitigation includes “compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.”]; see also *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814.)

A2-7

Mitigation through agricultural conservation easements can take at least two forms: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural easements. The conversion of agricultural land may be viewed as an impact of at least regional significance. Hence, the search for replacement lands may not need to be limited strictly to lands within the project’s surrounding area. A helpful source for regional and statewide agricultural mitigation banks is the California Council of Land Trusts. They provide helpful insight into farmland mitigation policies and implementation strategies, including a guidebook with model policies and a model local ordinance. The guidebook can be found at:

[California Council of Land Trusts](#)

Of course, the use of conservation easements is only one form of mitigation, and the Department urges consideration of any other feasible measures necessary to mitigate project impacts.

A2-8

Thank you for giving us the opportunity to comment on the Draft Environmental Impact Report for the Plumas Lake Middle School Project. Please provide the Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Associate Environmental Planner via email at Farl.Grundy@conservation.ca.gov.

A2-9

Sincerely,



Monique Wilber

Conservation Program Support Supervisor

From: Dhatt, Satwinder K@DOT <satwinder.dhatt@dot.ca.gov> **On Behalf Of** D3 Local Development@DOT
Sent: Tuesday, March 10, 2026 7:41 AM
To: jroberts@plusd.org
Cc: Jasmine Osman <josman@placeworks.com>; Justine Garner <jgarner@placeworks.com>; Malia Durand <mdurand@placeworks.com>
Subject: Notice of Availability: Plumas Lake Middle School Project

Hi Jeff,

Thank you for including the California Department of Transportation (Caltrans) in the review process for Plumas Lake Middle School Project . We wanted to reach out and let you know that we have no comments at this time.

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Should you have questions please contact me, Local Development Review and System Planning Coordinator, by phone (530) 821-8261 or via email at D3.local.development@dot.ca.gov.

Thank you!

Satwinder Dhatt
Local Development Review and Complete Streets
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3

703 B Street, Marysville, CA 95901
(530) 821-8261

A3-1

Plumas Lake MS EIR doesn't specify whether the sports fields will be plastic

Hi Superintendent Roberts,

In the Environmental Impact Report for the Plumas Lake Middle School Project at <https://ceganet.lci.ca.gov/2025060992/2>, I don't see any disclosure of whether the sports fields will be natural grass or artificial turf, a project decision that has radically different environmental impacts, especially regarding heat, stormwater quality, microplastics, and waste. This is essential information for understanding the project. Under CEQA's requirement for a clear and stable project description, the field surface must be identified or both options analyzed.

Could you please clarify which surface the District is proposing, and whether further CEQA review will be required if artificial turf is being considered?

Cynthia Fan [REDACTED]