



CEQA INITIAL STUDY

Use Permit CEQA UP-25;3-2
NextEdge Tower - Woodfern 100' Monopine Telecommunications Tower
APN: 031-310-024

May 2025

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Project Overview

Project Title:	Use Permit UP-25;3-2 NextEdge - Woodfern 100' Monopine Telecommunications Tower
Project Location:	23922 Woodfern Dr, Pioneer, CA 95642
Property Owner(s) Project Representatives	Amador County Recreation Agency Modus LLC; Vertical Bridge REIT, LLC 1355 Winward Concourse, Alpharetta. GA 30005
Zoning:	R1-B3, Single Family Residential (no further lot divisions)
General Plan Designation(s):	PS, Public Service
Lead Agency Name and Address:	Amador County Planning Department 810 Court Street, Jackson, Ca 95642
Contact Person/Phone Number:	Krista Ruesel, Planner (209) 223-6380
Date Prepared:	May 2025
Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)	

Project Description:

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA) Guidelines to review the Telecommunication Facility (the Project) submitted by Modus LLC. As stated by the applicant, “the wireless facility’s lease area is 1,200 square feet on property owned by the Amador County Recreation Agency. The project will include a Vertical Bridge-owned 100-foot monopine, an 8-foot chain link fence with privacy slats and chain link top cover, two 6- foot-wide chain link gates, and a new 600-amp multi-meter bank on a new H-frame. This project also includes six AT&T panel antennas, twelve AT&T remote radio units, three AT&T tower mounted DC-9 surge suppressors, one 40” x 52.25” x 9” ground level DC50 SPD, one AT&T GPS unit mounted on proposed outdoor walk-up cabinet, one AT&T outdoor walk-up cabinet, AT&T



30KW generator with 190 gallon diesel fuel tank on a new 5' x 9' concrete pad, one AT&T ice bridge, and a 200-amp dedicated meter panel mounted to vertical bridge 600-amp meter bank" (Modus, LLC).

This environmental review document provides an assessment of the potential impacts caused by the physical changes resulting from the development of the Project.

Project Location and Site Characteristics

The Project Site is located at 23922 Woodfern Dr., in Pioneer, CA 95666 within the unincorporated area of Amador County. The parcel is located on a 67.47-acre lot with the project site designated as a 30'x40' lease area (1200 sq. ft.). The project site will be located within the northwestern quadrant of the rectangular parcel, with access to the site from Woodfern Dr., a public road, from an existing encroachment located along the northern boundary of the parcel currently utilized to access the recreational facility.

The site is home to the County-owned Mollie Joyce Park, which includes outdoor and indoor recreational facilities including a disc golf course, two-baseball diamonds, a batting cage, a picnic area with tables and bbq, public restrooms, several outbuildings utilized for park use, and a parking lot. These facilities are located on the northern ±40 acres of the site to the north of State Highway 88. The remainder of the site consists of ±38 acres of vacant land south of Highway 88 covered with dense vegetation.

Access: Access to the wireless communications facility will be through the existing encroachment onto Woodfern Dr. on the northern boundary of the property. This access will not be required to be changed to accommodate this proposed use.

PROBABLE ENVIRONMENTAL EFFECTS AND SCOPE OF MITIGATED MND/MMRP

The Initial Study (IS) will analyze a broad range of potential environmental impacts associated with the proposed project. Information will be drawn from the Amador County General Plan, technical information provided by the applicant to date, and any other reputable information pertinent to the project area. This information includes existing Environmental Laws and Executive Orders, Coordination with other agencies and authorities. In the case that no immitigable, significant impacts are identified through the IS, a Mitigated Negative Declaration (MND) will be filed pursuant to CEQA requirements. Mitigation measures proposed serve to aid in the avoidance, minimization, rectification, reduction or elimination of impacts.

In the case that through the Environmental Assessment/Initial Study, it is determined that there will be significant, immitigable impacts, an Environmental Impact Report (EIR) may be required prior to project approval. Consistent with CEQA and the requirements of Amador County, each environmental chapter will include an introduction, technical approach, environmental setting, regulatory setting, standards of significance, identification of environmental impacts, the development of mitigation measures and monitoring strategies, cumulative impacts and mitigation measures, and level of significance after mitigation measures.

EVALUATION OF ENVIRONMENTAL IMPACTS PER CEQA:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).



- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c) (3) (D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Mineral Resources
- Noise
- Population / Housing
- Public Services
- Recreation
- Transportation / Traffic
- Utilities / Service Systems
- Mandatory Findings of Significance
- Wildfire
- Energy
- Tribal Cultural Resources

DETERMINATION: (To be completed by the Lead Agency)

On the basis of the initial evaluation:

<input type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input checked="" type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION , including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Planning Commission Chairperson

Date



FIGURE A: REGIONAL MAP

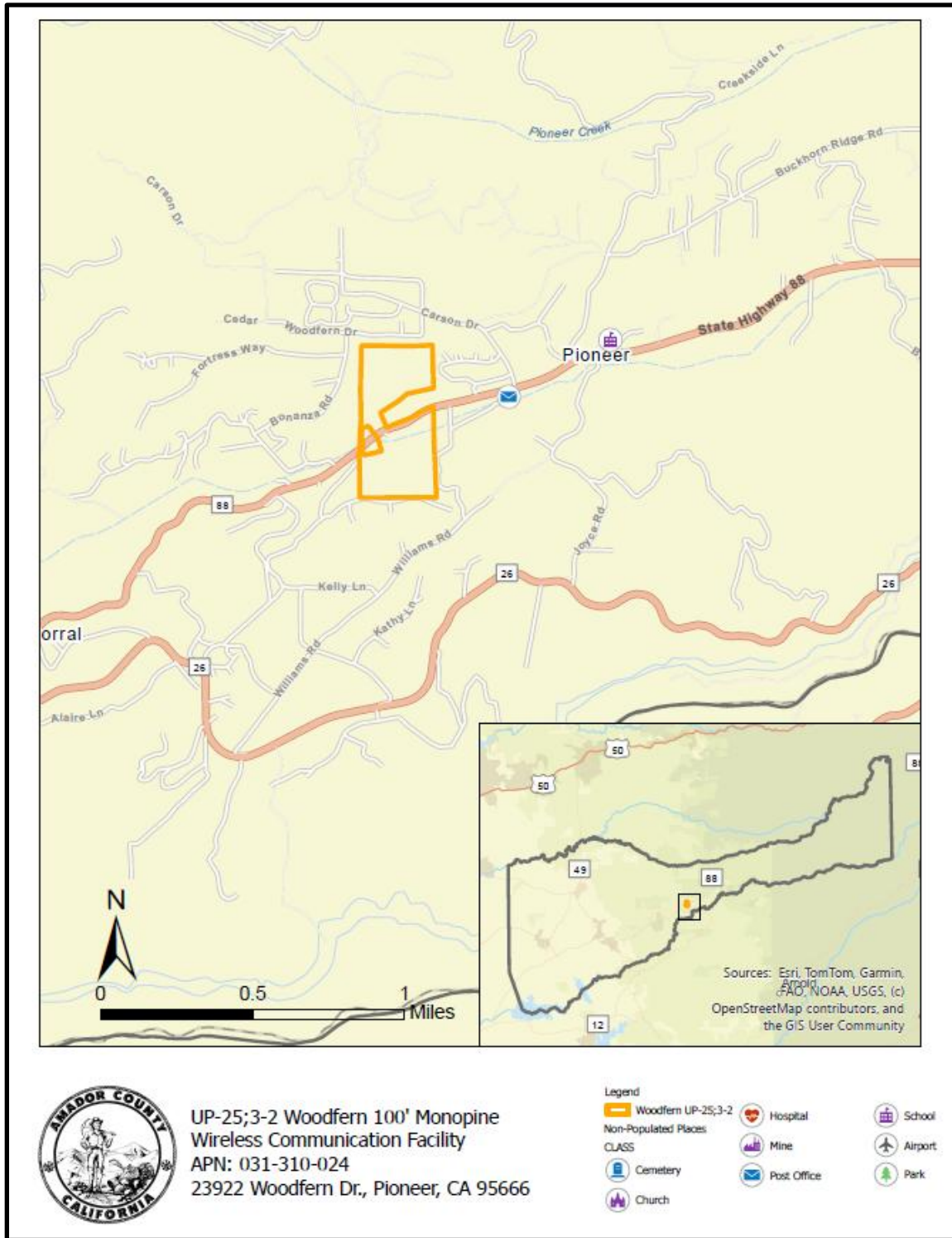




FIGURE B: PROJECT VICINITY MAP

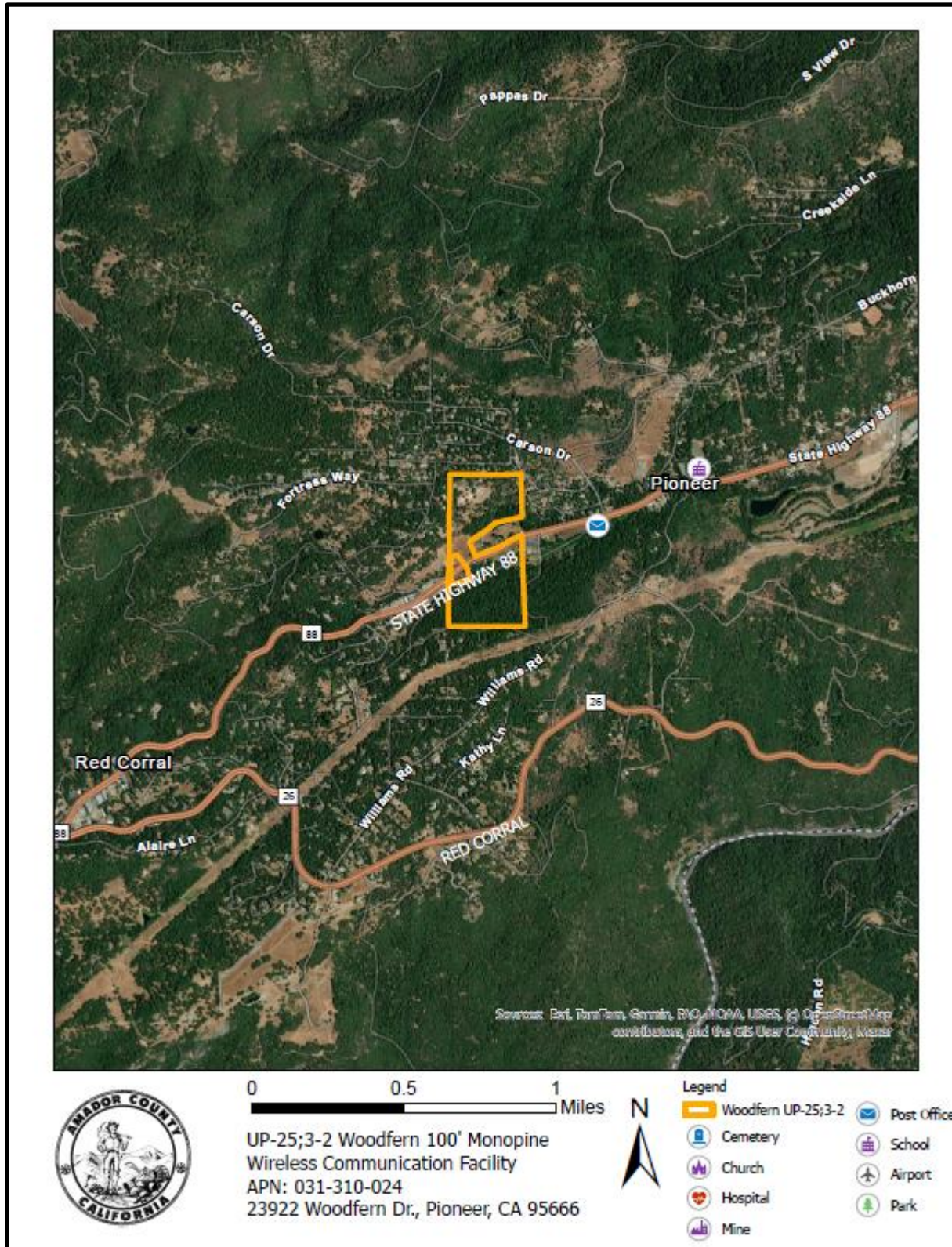




Figure C: Project Area Zoning Map

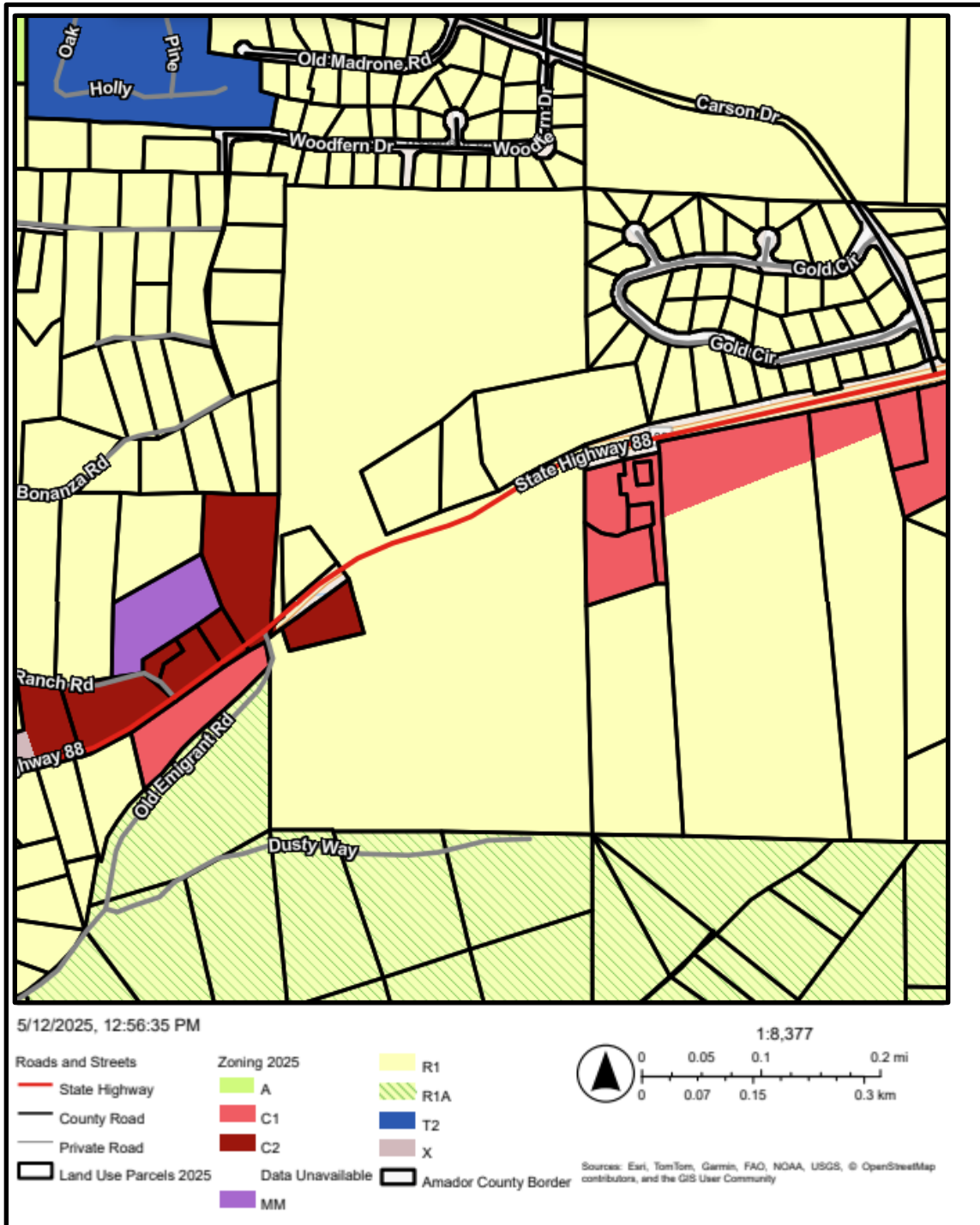




FIGURE D: PROJECT AREA GENERAL PLAN DESIGNATION(S) MAP

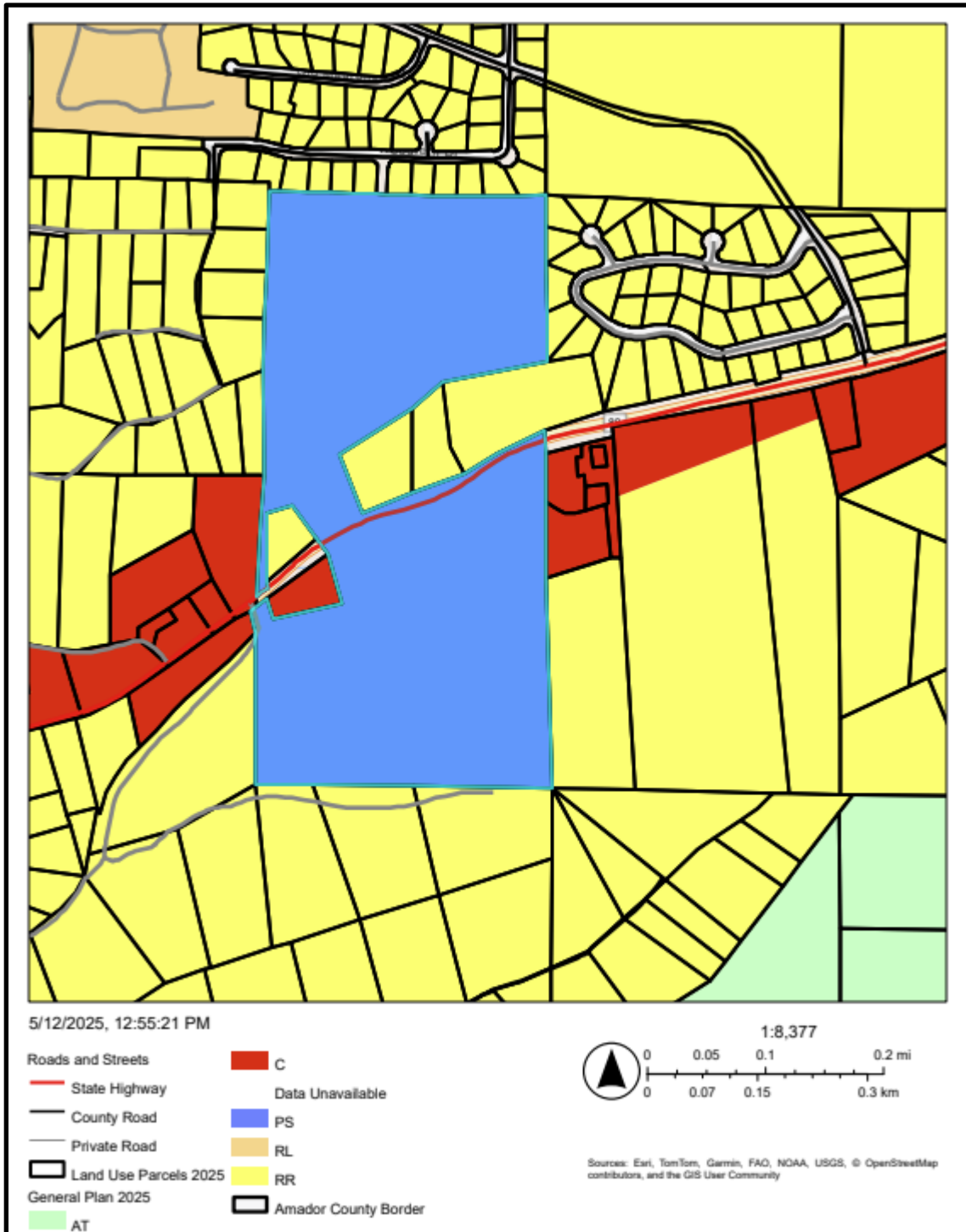




FIGURE E: SITE MAP AERIAL





Figure F: Site plan 1

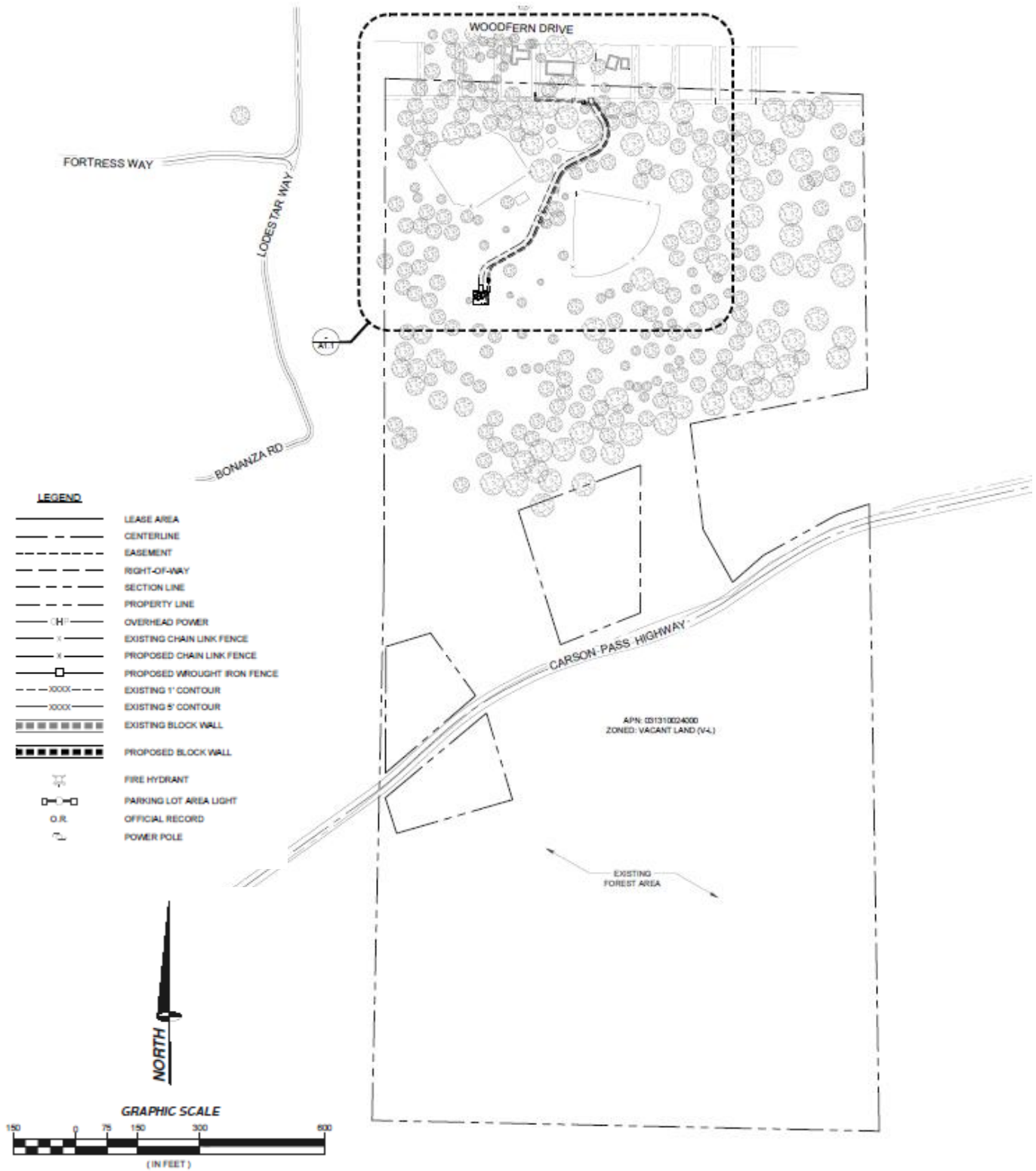




Figure G: Site plan 2

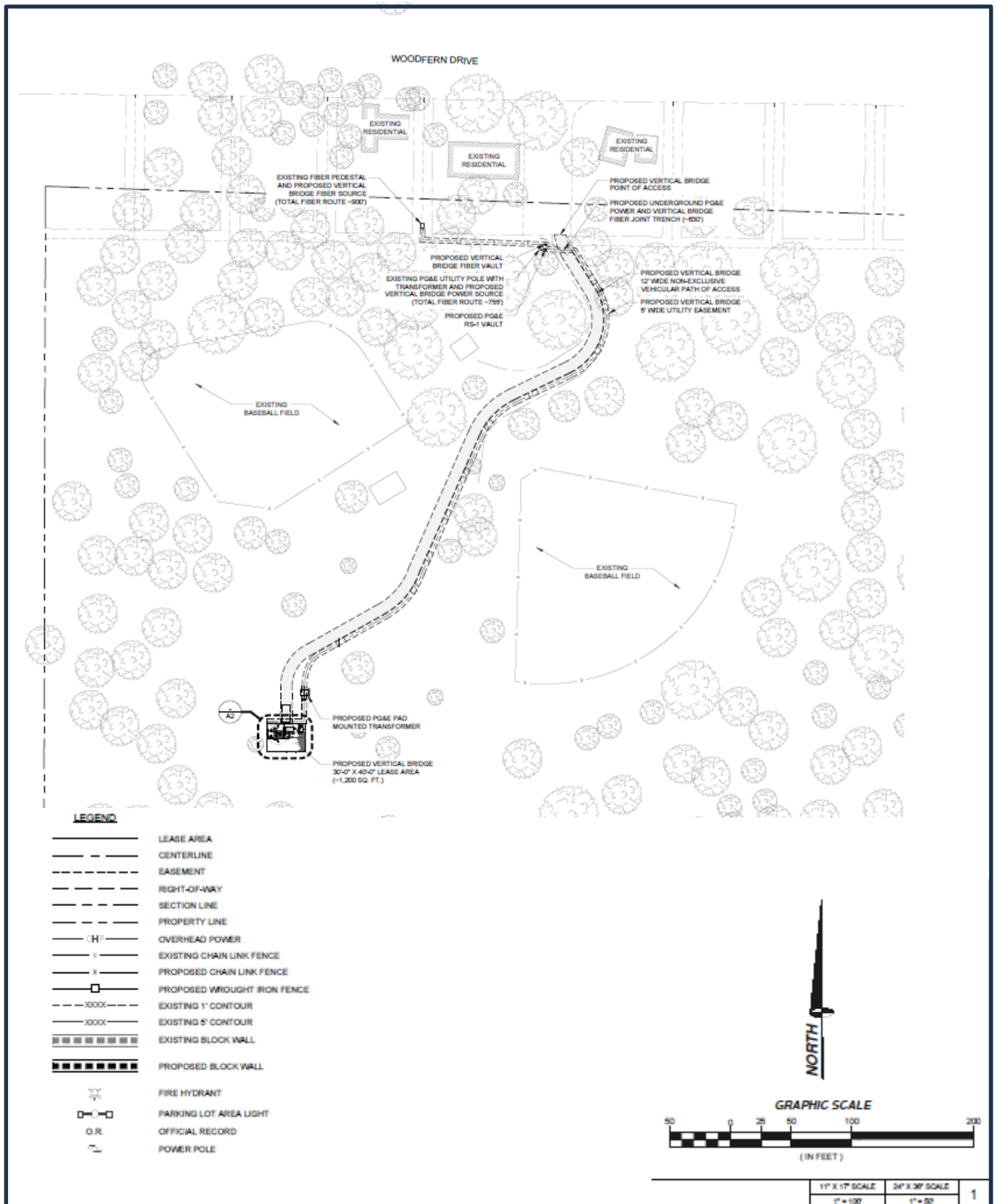
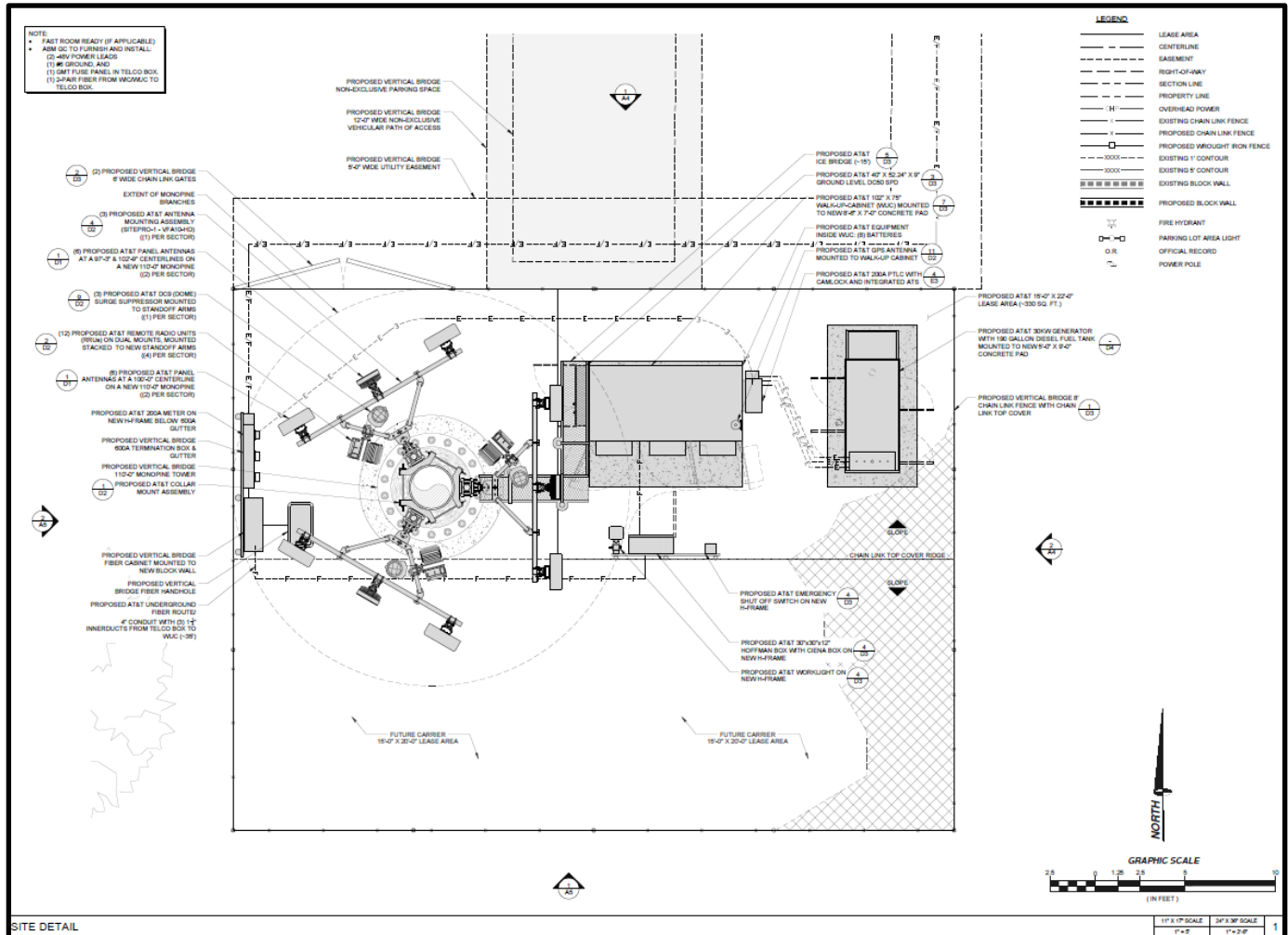




Figure H: Site Detail



SITE DETAIL



Figure I: Site Elevations

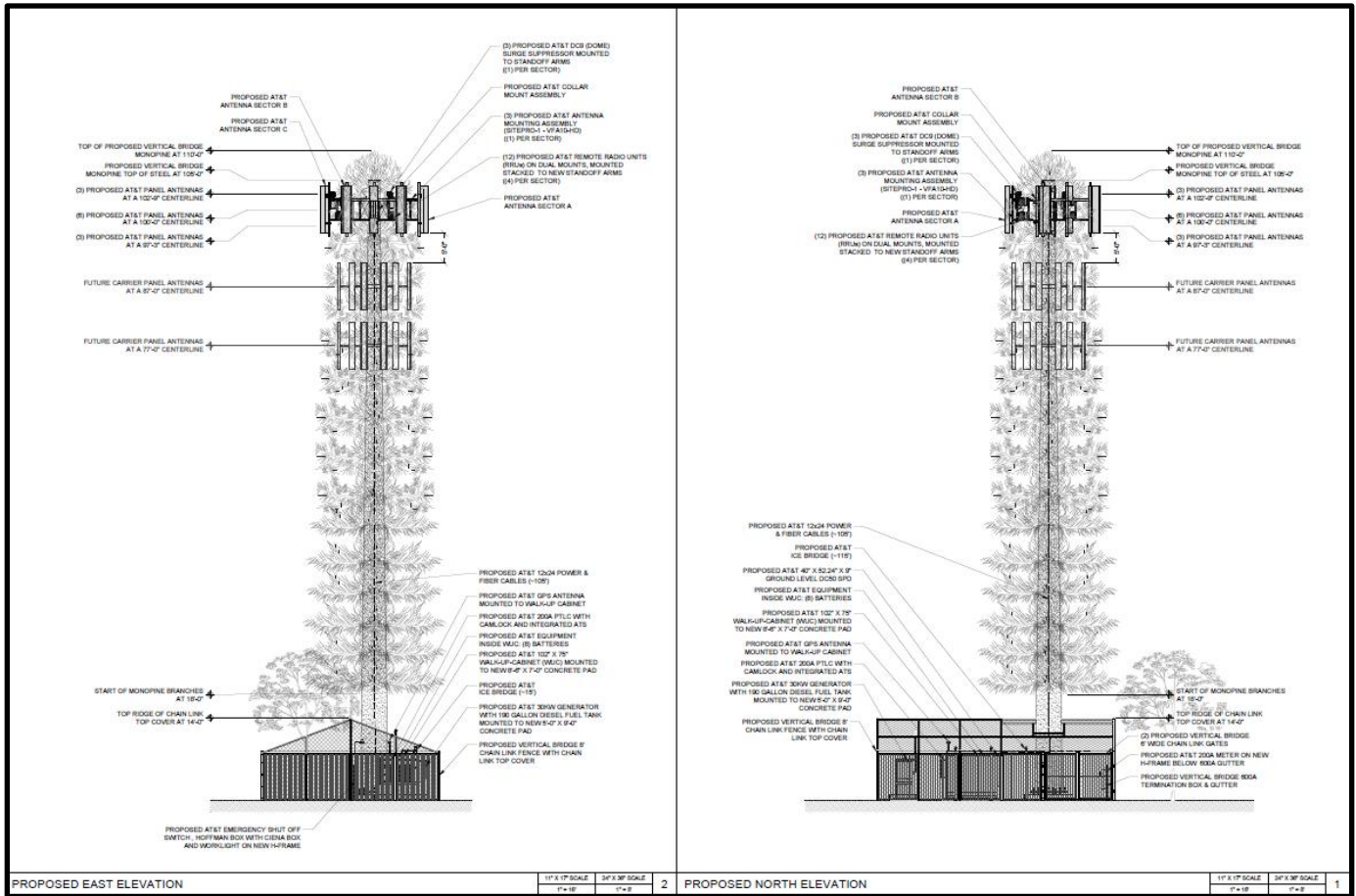




Figure J: Access Detail

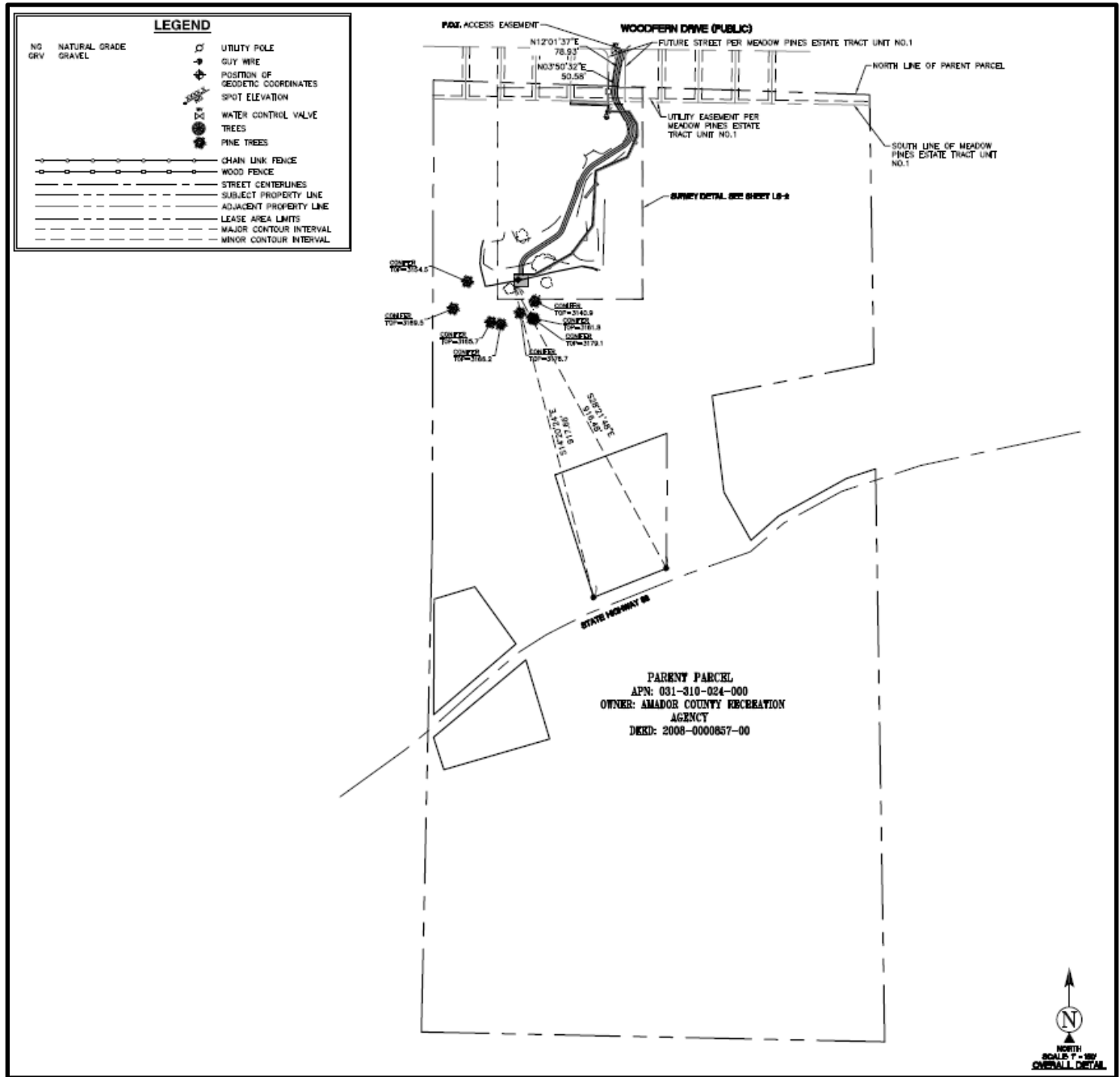




Figure K: Survey Detail 1

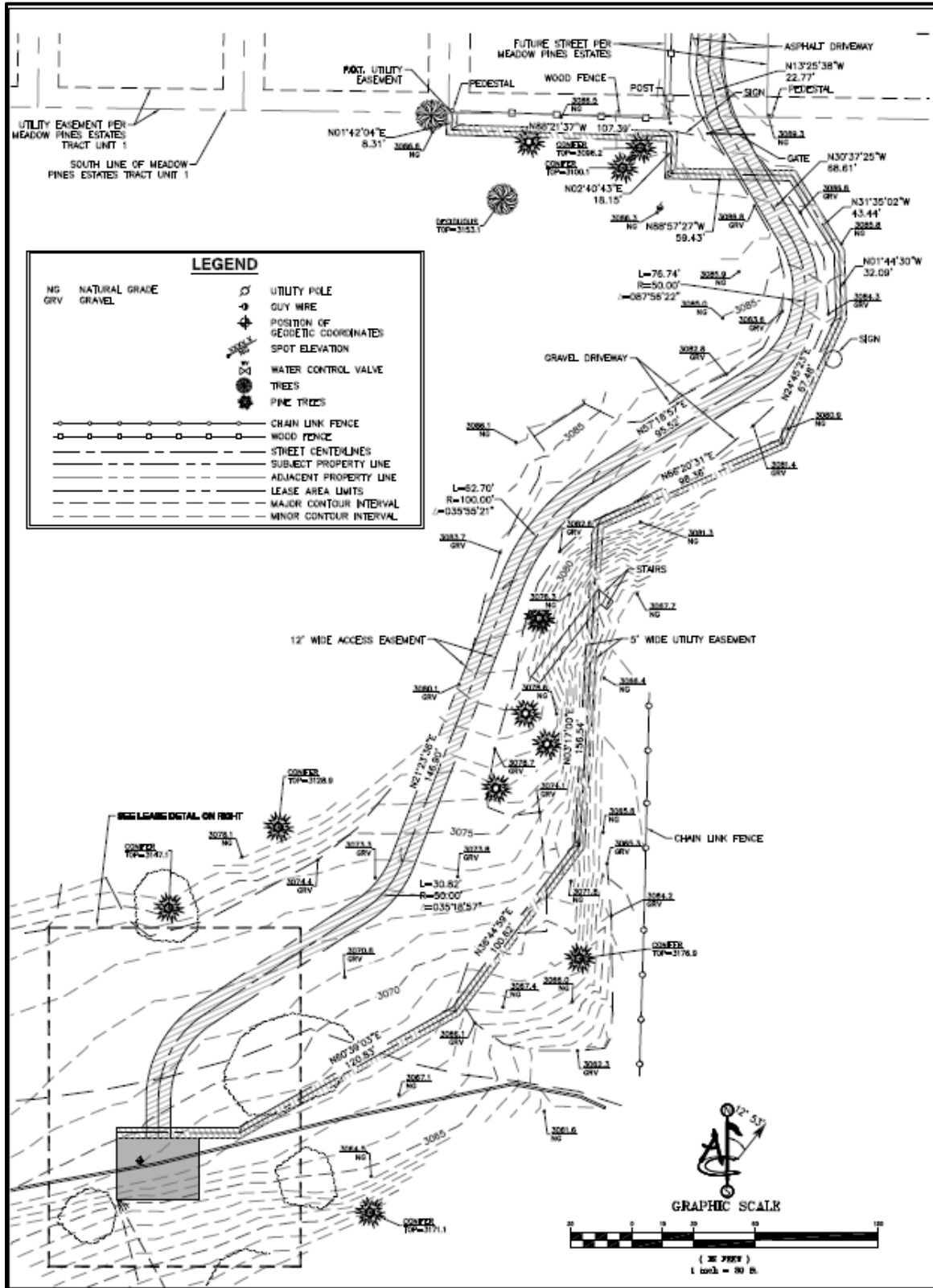
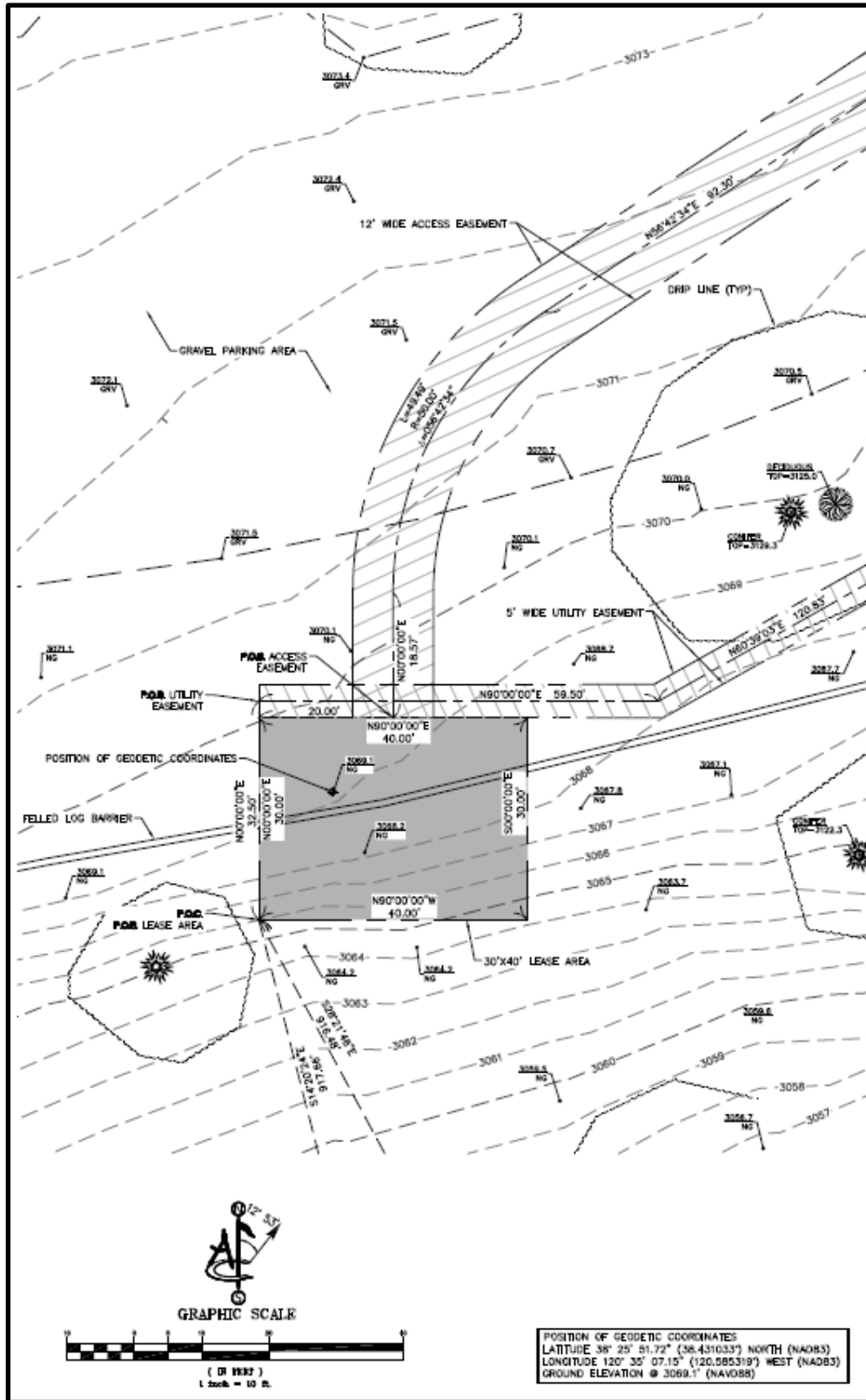




Figure L: Survey Detail 2





Chapter 1. AESTHETICS

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). Would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

- A. Vistas: For the purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Scenic vistas are often designated by a public agency. A substantial adverse impact to a scenic vista would be one that degrades the view from such a designated location. No governmentally designated scenic vista has been identified within the project area. The project includes the proposal of a telecommunication facility however the proposed monopine design is intended to reduce conflicting views and help camouflage the tower with the existing trees on the property as well as along the visible tree line. Therefore, there is **less than significant impact**.
- B. Scenic Highways: The project is not located along a scenic highway. Therefore, there is **no impact**.
- C. While there are no officially designated scenic vistas in the project area, certain short-range views would change for nearby property owners and the public traveling to and from Mollie Joyce Park. Additionally, County code section 19.48.150 states that at the time any permittee obtains a permit for a wireless service facility, they shall provide a performance bond in the amount of one hundred percent of the county's estimated cost for removal of the facility. This ensures a mechanism for removal of tower should it become abandoned. Photo simulations of the proposed tower were provided and the purpose of the monopine design is to reduce the visual impact of the cell tower on the landscape and to make it less obtrusive to viewers. These towers often use materials and designs that mimic the appearance of trees or other natural elements such as branches, leaves, and bark, making them less noticeable. The goal is to maintain the



functionality of the cell tower while minimizing its visual impact. Due to the topography, size of the property, proposed location, and monopine design, impacts are considered **less than significant with mitigation AES-1 incorporated**.

- D. Existing sources of light and glare in the project vicinity include vehicle headlights from the members of the public traveling along the highway as well as the existing lights on-site utilized for recreational purposes and events. The proposed project would not include lighting on the monopine and any lighting installed as part of the rest of the facility would function for security and/or safety. **Mitigation Measure AES-2** includes standards for lighting regulations sourced from the Amador County General Plan EIR and MMRP, and shall apply to any lighting utilized for other uses. The current designation as a public gathering space will result in a **less than significant impact with mitigations incorporated** to new sources of substantial light or glare.

Mitigation Measures

AES-1 Monopine Design. The proposed wireless tower shall be constructed as a monopine tower to match the surrounding character of the area.

AES-2 Standard Lighting Regulations. Any lighting installations must be compliant with County regulations, and be conditioned to incorporate measures to reduce light and reflectance pursuant to Amador County General Plan Mitigation Measure 4.1-4. This includes measures to reduce light and reflectance including limitation of all installed lighting with this project to full-cutoff, fully-shielded fixtures directed downwards with color correlative temperature (CCT) less than or equal to 3000K. Motion sensors and automatic shutoffs shall be used to limit all lighting fixtures in use after the recreational facility is closed to the public or after 10:00 p.m. This mitigation measure does not include applicability to lighting installations required to ensure public health or safety.

Source: Amador County Planning Department, Amador County General Plan and Final Environmental Impact Report (FEIR).



Chapter 2. AGRICULTURE AND FOREST RESOURCES

<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the CA Dept. of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project:</p>	<p>Potentially Significant Impact</p>	<p>Less Than Significant Impact with Mitigation Incorporated</p>	<p>Less Than Significant Impact</p>	<p>No Impact</p>
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the CA Resources Agency, to non-agricultural use?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC §12220(g)), timberland (as defined in PRC §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>



Discussion of Findings:

- A. Farmland Conversion: The project will not result in the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance. The project site is located in an area designated as "Other Land" by the California Department of Conservation, Division of Land Resource Protection. There is **no impact** to farmland.
- B. The parcel is not included in a Williamson Act contract, therefore there is **no impact**.
- C. The area is not considered forest land, or zoned as forest land or timberland, therefore **no impacts will occur**.
- D. The area is not considered forest land, or zoned as forest land or timberland, therefore **no impacts will occur**.
- E. The project area is within an area designated as "Other Land". This project does not introduce any additional use or impact that would introduce significant changes to nearby property uses. There is a **no impact** to farmland or forest land through this project.

Source: Amador County Important Farmland Map, 2020; Amador County General Plan; Planning Department; CA Public Resources Code; California Department of Conservation.



Chapter 3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard, result in substantial increase of any criteria pollutant, or substantially contribute to an existing or projected air quality violation under an applicable local, federal, or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (example: Odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

- A. Amador Air District (AAD) is a Special District governed by the Amador County Air District Board. The primary goal of the AAD is to protect public health by managing the county's air quality through educating the public and enforcement of District rules and California Air Resources Control Board - Air Toxic Control Measures that result in the reduction of air pollutants and contaminants. While there are minimal sources that impact air quality within the District, Amador County does experience air quality impacts from the Central Valley through transport pollutants. The most visible impacts to air quality within the District are a result of open burning of vegetation as conducted by individual property owners, industry, and state agencies for purposes of reducing wild land fire hazards. Operation of the proposed project would not result in a population increase and would not generate new vehicle trips beyond occasional maintenance of the site and facility. No other emissions would be associated with the long-term operation of the proposed project. Construction-related emissions would be considered short-term during the primary installation of the facility and, if applicable, future removal of the facility. These activities would employ industry-standard best management practices (BMPs) to mitigate the effects of emissions and energy usage, and would be required to fall within the parameters established through the Amador County General Plan. These requirements are included **under Mitigation Measure AIR-1**. Therefore, the proposed impacts would be **less than significant with mitigations incorporated**.
- B. Operational emissions generated would be limited to one to two vehicle trip per month for project site maintenance. Therefore, the proposed project would not generate substantial operational or long-term emissions. Construction of the proposed project would generate temporary emissions associated with construction equipment. As discussed above, both operational and construction emissions generated by the proposed project would be minimal with implementation of **Mitigation Measure AIR-1**. Therefore,



the proposed project would not violate any air quality standards or cumulatively contribute to the net increase of PM10 or ozone in the region. Impacts would be **less than significant with mitigations incorporated.**

- C. Sensitive receptors are uses that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The project site is a county park within a residential neighborhood. While construction would take place within the vicinity of sensitive receptors, construction emissions would be limited to fall within the parameters set forth by CARB, included as **Mitigation Measures AIR-1 and AIR-2**. Therefore, the small amount of emissions generated and the short duration of the construction period would not expose sensitive receptors to substantial pollutant concentrations. Impacts to sensitive receptors would be **less than significant with mitigations incorporated.**
- D. The proposed project includes the installation of a cellular tower on a ±69-acre parcel. The project includes the utilization of a 30 KW generator with 190 gallon diesel fuel tank. Amador Air District is responsible for the permitting and regulation of generators, and the permittee would be required to keep and maintain appropriate permits for the life of the project, which would be included as a condition of approval and is also included under **mitigation measure AIR-2**. The proposed 30 KW generator does not meet the 37 KW threshold requiring permitting through Amador Air District; however, any changes local regulation would require ongoing compliance. With this mitigation, there is no significant impact from the production emissions. Therefore, there is a **less than significant impact with mitigation(s) incorporated.**

Source: Amador Air District, Amador Planning Department, Amador County General Plan EIR.

Mitigation Measures

AIR-1 Air Quality Best Management Practices (BMPs). Permittee shall meet requirements that may be deemed necessary by the Amador Air District based upon site conditions and operations. The project shall require that idling times for construction equipment and vehicles be limited to a maximum of 5 minutes to reduce operational emissions of criteria pollutants per General Plan Mitigation Measure 4.3-2a.

AIR-2 Generator Emission Permits. Permittee shall be required to keep and maintain adequate permits from Amador Air District as determined necessary in order to ensure emissions from the proposed generator fall within the acceptable level per California Air Resources Board (CARB) regulations.

Source: Amador Air District, Amador County Planning Department, Amador County General Plan Mitigation Measure 4.3.



Chapter 4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse 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 CA Dept. of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CA Dept. of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Discussion of Findings:

- A. Per General Plan Mitigation Measure 4.4-1b: Special-Status Species Protection, when considering discretionary development proposals, the County, through CEQA reviews, will require assessments of potential habitat for special-status species on proposed projects sites, and avoidance or substantial reduction of impacts to that habitat through feasible alternatives or mitigation measures, including compensatory mitigation where unavoidable losses of occupied habitat would occur. The project applicant submitted a “General Biological Evaluation” for the project performed by Ace Environmental Inc., which included identification of potentially sensitive biological resources in the project vicinity, as well as an evaluation of impacts to those potentially sensitive biological resources. Avoidance and Minimization measures were included as part of this evaluation, are included as Mitigation Measure BIO-1, as well as standard biological mitigations as determined by the Amador County General Plan EIR and MMRP (Ace Environmental, 2025).

Mitigation measures will be developed to be consistent with applicable state and federal requirements. For those species for which published mitigation guidance exists, developed mitigation measures will follow the guidance provided in these publications or provide a similar level of protection. If previous published guidance does not exist, mitigation will be developed in consultation with the appropriate agencies (USFWS for federally listed plant, wildlife and fish species; NMFS for listed anadromous fish species; CDFW for state listed species, species of special concern and CRPR-ranked species). The County will require project applicants to obtain any required permits prior to project implementation.

The US Fish & Wildlife Office’s Information for Planning and Conservation (IPaC) database were employed to determine if any special status animal species or habitats occur on the project site or in the project area. This inventory has been combined with the inventory included in the inventory performed by Ace Environmental, and is summarized in Tables 1, 2, and 3, below.

There was no critical habitat identified at this location for any of the identified species potentially found within the project site or vicinity. Due to the existing level of development of the project site (specifically the area north of Highway 88) as well as the existing uses employed on the property, it is highly unlikely sensitive animal species would be significantly impacted by the project’s development. Additionally, the pre-existing conditions of the site shall not be introduced to substantial change by the relatively small area which is expected to experience ground-disturbing activity, and the relative low-intensity use of the area surrounding the leased area for the cell tower.

The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants identified four (4) plants found in the project area and the report by Ace Environmental four (4) as well. However, between these two reports, six (6) plants in total were identified as having potential habitat within the project vicinity. These plants are shown in *Tables 2 and 3*. As the proposed project may include ground disturbing activity, **Mitigation Measure BIO-2** listed would be implemented to reduce impacts to **less than significant with mitigations incorporated**.



TABLE 1: SENSITIVE SPECIES OCCURRING IN THE AREA- ANIMALS

Species		Status			Potential to Affect
Scientific Name	Common Name	FWS	CDFW	CRPR	
WILDLIFE					
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None	SC	-	No Effect.
<i>Danaus plexippus</i>	Monarch butterfly	CAND	None	-	No Effect.
<i>Emys (Actinemys) marmorata</i>	Northwestern pond turtle	PT	SSC	-	No Effect.
<i>Haliaeetus leucocephalus</i>	Bald eagle	BCC	SE	-	No Effect.
<i>Rana boylei pop. 5</i>	foothill yellow-legged frog - south Sierra DPS	FE	SE	-	No Effect.
<i>Rana draytonii</i>	California red-legged frog	FT	SC	-	No Effect.
<i>Spea hammondi</i>	Western spadefoot	PT	SC	-	No Effect.
<i>Strix nebulosa</i>	great gray owl	None	SE	-	No Effect.
<i>Strix occidentalis occidentalis</i>	California spotted owl	PT	SC	-	No Effect.
California Native Plant Society Rare Plant Rank (CRPR) 1B Plants rare, threatened, or endangered in California and elsewhere 2B Plants are rare, threatened or endangered in California, but more common elsewhere .1 Seriously threatened in California (More than 80% of the occurrences are threatened) .2 Moderately threatened in California (20-80% occurrences threatened)					
U.S. Fish and Wildlife Service (FWS) FE-Federal Endangered FT- Federally Threatened PT-Proposed Threatened (Listing in review) CAND- Candidate for listing (in process of being listed once time and funds available)		California Department of Fish and Wildlife (CDFW) SSC State Species of Special Concern SE State Endangered			

B. Natural communities of concern (i.e. riparian, wetlands, and oak woodlands) are considered sensitive under CEQA and may be regulated by the CDFW pursuant to Section 1602 of the California Fish and Game Code. Riparian communities and wetlands may also be regulated by the United States Army Corps of Engineers and/or Regional Water Quality Control Board if the community is determined to be waters of the United States, or waters of the State. The National Wetlands Inventory indicates that the project property is located near wetland, pond, and riverine habitat however these areas are mapped in the southern portion of property at a significant distance from the project site (the northwestern portion of the property) as shown in Table 4. The small size of the project site will present **less than significant impact to** any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.



TABLE 2: CALIFORNIA NATIVE PLANT SOCIETY DATABASE QUERY (CNPS)

SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFECYCLE	BLOOMING PERIOD	FED LIST	STATE LIST	GLOBAL RANK	STATE RANK	CA RARE PLANT	CA ENDEMIC	DATE ADDED
<i>Chlorogalum grandiflorum</i>	Red Hills soaproot	Agavaceae	perennial bulbiferous herb	(Apr)May-Jun	None	None	G3	S3	1B.2	Yes	1974-01-01
<i>Clarkia virgata</i>	Sierra clarkia	Onagraceae	annual herb	May-Aug	None	None	G3	S3	4.3	Yes	1974-01-01
<i>Erythranthe marmorata</i>	Stanislaus monkeyflower	Phrymaceae	annual herb	Mar-May	None	None	G2?	S2?	1B.1	Yes	1974-01-01
<i>Lathyrus sulphureus var. argillaceus</i>	dubious pea	Fabaceae	perennial herb	Apr-May	None	None					

TABLE 3: SENSITIVE SPECIES OCCURRING IN THE AREA- PLANTS (ACE ENVIRONMENTAL,2025)

Species		Status			Potential to Affect
Scientific Name	Common Name	FWS	CDFW	CRPR	
PLANTS					
<i>Chlorogalum grandiflorum</i>	Red Hills soaproot	None	None	1B.2	No Effect.
<i>Eryngium pinnatisectum</i>	Tuolumne button-celery	None	None	1B.2	No Effect.
<i>Erythranthe marmorata</i>	Stanislaus monkeyflower	None	None	1B.1	No Effect.
<i>Sphenopholis obtusata</i>	prairie wedge grass	None	None	2B.2	No Effect.

¹ California Natural Diversity Database (CNDDB). 2024. CDFW BIOS Version 6.24. Accessed January 16, 2024

² California Native Plant Society, Rare Plant Program. 2024. Inventory of Rare and Endangered Plants of California (online edition, v9.5). Website <http://www.rareplants.cnps.org> [accessed 16 January 2024].

C. General Plan Mitigation Measure 4.4-5 requires project applicants to conduct wetland delineations according to USACE standards and submit the delineations to the USACE for verification. Based on the verified delineation, project applicants will quantify impacts to wetlands and other waters of the United States resulting from their proposed projects. A permit from the USACE will be required for any activity resulting in impacts of “fill” of wetlands and other waters of the United States. If projects require activities that result in impacts to wetlands and other waters of the United States, the County during discretionary project review will require project applicants to obtain all necessary permits under Section 404 of the CWA, and implement compensatory mitigation consistent with USACE and EPA’s April 10, 2008 Final Rule for Compensatory Mitigation for Losses of Aquatic Resources (33 CFR Parts 325 and 332 and 40 CFR Part 230), including preparation of a wetland mitigation plan if required. The wetland mitigation plan will include ecological performance standards, based on the best available science that can be assessed in a practicable



manner. Performance standards must be based on attributes that are objective and verifiable. The County will require project applicants to commit to replace, restore, or enhance on a “no-net-loss” basis (in accordance with USACE Section 404 no-net-loss requirements) the acreage of all wetlands and other waters of the United States that would be removed, lost, and/or degraded by discretionary projects.

The County will require similar mitigation for loss of non-jurisdictional wetlands and waters that are waters of the state and have value as biological resources. For Section 404 mitigation, in accordance with the Final Rule, mitigation banks (e.g., Cosumnes Floodplain Mitigation Bank) will be given preference over other types of mitigation because much of the risk and uncertainty regarding mitigation success is alleviated by the fact that mitigation bank wetlands must be established and demonstrating functionality before credits can be sold. The Final Rule also establishes a preference for compensating losses of aquatic resources within the same watershed as the impact site. A combination of mitigation bank credits and permittee-responsible on and off-site mitigation may be used as needed to fully offset project impacts on wetlands and other waters of the United States and waters of the state. Project applicants that obtain a Section 404 permit will also be required to obtain certification from the Regional Water Quality Control Board (RWQCB) pursuant to Section 401 of the CWA. If the project involves work on the bed or bank of a river, stream or lake, a Streambed Alteration Agreement from CDFW pursuant to Section 1602 of the Fish and Game Code will also be needed, which will include mitigation measures required by CDFW. The County will require project applicants to obtain all needed permits prior to project implementation, and to abide by the conditions of the permits, including all mitigation requirements.

Responsibility falls upon the applicant to take any precautions or recommendations of the enforcing agency (CDFW or USFWS) regarding impacts to the Riverine Community in the case that further ground-disturbing activities or site development occur, referenced in this document as **Mitigation Measure BIO-1**. However, due to the location of the proposed project in the northwestern portion of the property, it is highly unlikely these additional requirements would be triggered through the implementation of the project. The General Plan mitigation measures are included as the adequate mitigations for the project-scope and scale as proposed and are included as **Mitigation Measure BIO-1**. Therefore, impacts to wetlands would be **less than significant with mitigation incorporated**.

- D. Movement of Fish and Wildlife: There is no major impact on the migratory thoroughfare of any fish and wildlife. Migratory birds potentially found in the project area include the: American Dipper (*Cinclus mexicanus*); Bald eagle (*Haliaeetus leucocephalus*); Black-throated Gray Warbler (*Dendroica nigrescens*); Oak Titmouse (*Baeolophus inornatus*); and Wrentit (*Chamaea fasciata*). The Foothill Yellow-legged Frog (*Rana boylei*), and Western Spadefoot (*Spea hammondi*) have a potential suitable habitat area in and surrounding the project, but the site is small enough as to not greatly affect movement of these species.

The construction of a new communication tower creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. Communications towers are estimated to kill 4-5 million birds per year, which violates the spirit and the intent of the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and related Code of Federal Regulations designed to implement the MBTA. Some of the species affected are also protected under the Endangered Species Act and Bald and Golden Eagle Act. Interim guidelines were developed by Fish and Wildlife Service personnel from research conducted in several eastern, midwestern, and southern states, and have been refined through regional review. They are based on the best information available at this time and are the most prudent and effective measures for avoiding bird strikes at towers. Some of the guidelines are:

- New facilities should be collocated on existing towers or other existing structures.
- Towers should be less than 200 feet above ground level
- Towers should be freestanding (i.e., no guy wires)



- Towers and attendant facilities should be sited, designed and constructed so as to avoid or minimize habitat loss within and adjacent to the tower “footprint”.
- New towers should be designed structurally and electrically to accommodate the applicant/licensee’s antennas and antennas for at least two additional users (minimum of three users for each tower structure).
- Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.
- Towers no longer in use or determined to be obsolete should be removed within 12 months of cessation of use.

The project is consistent with the U.S. Fish and Wildlife Service interim guidelines because the proposed 100-foot tower is less than 200 feet in height and no guy wires are necessary. The footprint of the proposed lease area would not encroach onto any environmentally sensitive habitat. Although the proposed project will be in a relatively small area of the project site, there is the potential for impact to the nesting of migratory birds in the project area. **Mitigation measure BIO-2** requires a nesting bird preconstruction survey prior to project construction. As there is suitable habitat in the project area for some or all of the above species, **Mitigation Measure BIO-2** is needed to ensure that project impacts are **less than significant with mitigation incorporated**.

- E. The proposed project would not conflict with local policies adopted for the protection of biological resources. **No impact** would occur.
- F. Amador County does not have an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans. **No impact** would result.

Mitigation Measures

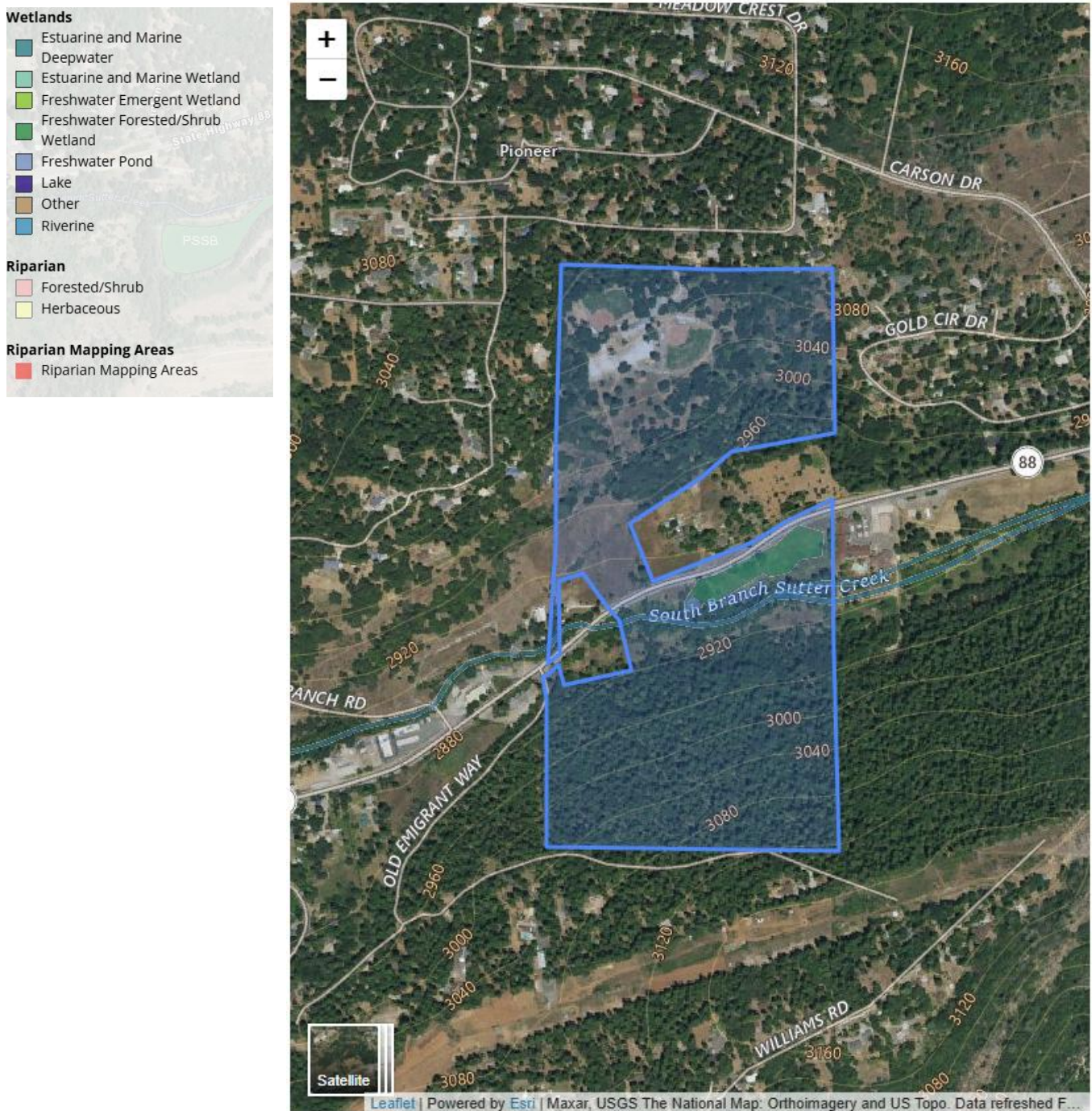
Bio-1 Compete avoidance of wetlands is conservatively recommended to ensure compliance with wetland laws. Site development shall implement erosion control plans, and best management practices (BMPs) that prevent the discharge of sediment into nearby drainage channels and wetlands as determined necessary at the time of grading permit application. To the extent feasible, any intermittent creeks within the project vicinity shall be preserved, with a 50-foot buffer, limited to construction on either side of the creek. This buffer should be 50 feet in width on each side of the creek as measured from the edge of US Army Corps of Engineers jurisdiction. This mitigation measure shall not apply where it conflicts with hazardous site remediation required by orders from the Central Valley Regional Water Quality Control Board. If complete avoidance of potential jurisdictional Waters of the U.S. or wetlands is not practicable, a wetland delineation should be prepared and submitted to USACE for verification in order to determine the jurisdictional or non-jurisdictional nature of the seasonal wetlands and man-made drainage ditch. If jurisdictional areas will be impacted, wetland permits/and or certification should be obtained from USACE, CDFW, and the RWQCB prior to placement of any fill (e.g., a culvert, fill slope, rock) within potential Waters of the U.S.

Bio-2 Ground Disturbance Timing for Nesting Birds. The adjacent forest habitat is very likely used by nesting birds during the breeding season. Due to the potential for birds to nest in the vicinity of this site, if construction of this site should occur during the bird nesting season, a pre-construction nesting bird survey should be conducted by a qualified biologist no more than 7 days prior to the initiation of work. The survey should also include a cavity nest search if any trees are to be removed as part of the project. If an active nest is found within the project’s zone of influence, an avoidance plan will be written to ensure construction does not cause nest failure. If an active nest is encountered during the construction of future maintenance activities, work should stop immediately until a biologist can determine the



status of the nest and when work can proceed without risking violation of state or federal laws (Ace Environmental, 2025). The applicant shall be required to adhere to the biologist's recommendation(s), consistent with best-management practices as established by the responsible regulatory agency, which may include the establishment of buffers, demarcation of sensitive areas, fencing and/or restriction of access to certain areas, subsequent monitoring, or other measures as determined necessary.

Figure 1: National Wetland Inventory (IPAC 2025)





NWI: PSSA- Freshwater Forested/Shrub Wetland	
Size	1.668 acres
P	<i>System Palustrine : The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.</i>
SS	<i>Class Scrub-Shrub : Includes areas dominated by woody vegetation less than 6 m (20 feet) tall. The species include true shrubs, young trees (saplings), and trees or shrubs that are small or stunted because of environmental conditions.</i>
A	<i>Class Temporary Flooded : Surface water is present for brief periods (from a few days to a few weeks) during the growing season, but the water table usually lies well below the ground surface for the most of the season.</i>

NWI: R4SBC- Riverine	
Size	3.093 acres
R	<i>System Riverine : The Riverine System includes all wetlands and deepwater habitats contained within a channel, with two exceptions: (1) wetlands dominated by trees, shrubs, persistent emergents, emergent mosses, or lichens, and (2) habitats with water containing ocean-derived salts of 0.5 ppt or greater. A channel is an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two bodies of standing water.</i>
4	<i>Subsystem Intermittent : This Subsystem includes channels that contain flowing water only part of the year. When the water is not flowing, it may remain in isolated pools or surface water may be absent.</i>
SB	<i>Class Streambed : Includes all wetlands contained within the Intermittent Subsystem of the Riverine System and all channels of the Estuarine System or of the Tidal Subsystem of the Riverine System that are completely dewatered at low tide.</i>
C	<i>Class Seasonally Flooded : Surface water is present for extended periods especially early in the growing season, but is absent by the end of the growing season in most years. The water table after flooding ceases is variable, extending from saturated to the surface to a water table well below the ground surface.</i>

NWI: PUBHh	
Size	0.083 acres
P	<i>System Palustrine : The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.</i>
UB	<i>Class Unconsolidated Bottom : Includes all wetlands and deepwater habitats with at least 25% cover of particles smaller than stones (less than 6-7 cm), and a vegetative cover less than 30%.</i>
H	<i>Class Permanently Flooded : Water covers the substrate throughout the year in all years.</i>

Source: California Department of Fish and Wildlife BIOS, U.S. Fish and Wildlife Service IPAC, California Native Plant Society (CNPS) California Department of Fish and Wildlife Habitat Conservation Planning, Migratory Bird Treaty Act, NOAA, National Wetlands Inventory, 2019, Amador County Planning Department.



Chapter 5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

- A. The County will require applicants for discretionary projects that could have significant adverse impacts to prehistoric or historic-era archaeological resources to assess impacts and provide mitigation as part of the CEQA process, and consistent with the requirements of CEQA Guidelines Section 15126.4(b)(3) and Public Resources Code Section 21083.2, or equivalent County regulation. These regulations generally require consultation with appropriate agencies, the Native American Heritage Commission, knowledgeable and Native American groups and individuals, new and updated record searches conducted by the North Central Information Center and federal and incorporated local agencies within and in the vicinity of the project site, repositories of historic archives including local historical societies, and individuals, significance determinations by qualified professionals, and avoidance of resources if feasible. If avoidance is not feasible, recovery, documentation and recordation of resources is required prior to project implementation, and copies of the documentation are forwarded to the NCIC.
- B. A Cultural Resources Study was prepared for this project by Ace Environmental, LLC which included background research, inventory of sites, and an on-site inspection of the property. Background research included recorded cultural resources (precontact and historic archaeological sites, historic buildings, structures, objects, or districts) within the area of potential effects (APE), as required by Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulations, 36 CFR Part 800.
- C. On January 26, 2024, the PGI archaeologist visited the Direct APE and conducted an investigation of the proposed project area and cultural resource compliance review. During the survey, no cultural resources were observed, and the Direct APE was determined to appear to have very limited, if any, potential for archaeological resources. The Indirect/Visual APE consisted of a 250-ft visual radius of the Direct APE as well as the 0.50-mi records search radius in accordance with Section VI.C.4 of the 2004 PA. There are no recognized National Register historic properties within the Direct APE nor the Indirect/Visual APE.



D. The Archeologist's statement determines that the project undertaking appears to have no effect on the ape and therefore no mitigations are recommended. Mitigations are included below as standard of any discretionary projects within Amador County, consistent with the Amador County General Plan, and are considered precautionary measures. The impact is **less than significant with mitigations incorporated**.

Mitigation Measures

CULTR-1 During ground-disturbing activity, if paleontological, historic or pre-historic resources such as chipped or ground stone, fossil-bearing rock, large quantities of shell, historic debris, building foundations, or human bone are inadvertently discovered, the operator/permittee shall immediately cease all such activities within 100 feet of the find and notify the applicable agency. A qualified archaeologist shall be contracted by the operator/permittee to assess the significance of the find and prepare an evaluation, avoidance or mitigation plan, as appropriate, which shall be implemented before resuming ground disturbing activities.

CULTR-2 Immediately cease any disturbance of the area where such suspected remains are discovered and any nearby areas reasonably suspected to overlie adjacent remains until the Amador County Coroner is Amador County General Plan FEIR AECOM County of Amador 4.5-15 Cultural Resources contacted, per Section 7050.5 of the California Health and Safety Code,. The coroner shall, within two working days:

Determine if an investigation of cause of death is required;

- a. Determine if the remains are most likely that of Native American origin, and if so suspected, the coroner shall notify the California Native American Heritage Commission (NAHC) within 24 hours of making his or her determination.
- b. The descendants of the deceased Native Americans shall make a recommendation to the operator/ permittee for the means of handling the remains and any associated grave goods as provided in Public Resources Code (PRC) Section 5097.98.
- c. The NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American.
- d. The descendants may, with the permission of the landowner or their representative, inspect the site of the discovered Native American remains and may recommend possible treatment or disposition within 24 hours of their notification.
- e. Whenever the NAHC is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendent and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

CULTR-3 Avoidance of the identified cultural resources would be the preferred mitigation for any project that may threaten the resource(s) or any significant cultural resources. If the County approves the project, and a previously unrecorded archaeological resource is discovered during any future ground disturbing activity, all work shall stop in the immediate vicinity of the find and the resource shall be documented, evaluated, and an appropriate means of mitigating any adverse effects shall be recommended by an archaeologist who meets the Secretary of the Interior's professional qualifications standards in prehistoric or historical archaeology, as appropriate. In the unlikely event that human remains are



discovered, California law requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition of the remains and any grave goods. If the Coroner determines that no investigation of the cause of death is required and if the Native American heritage commission, which in turn will inform a most likely descendant, the descendant will then recommend to the landowner appropriate disposition of the remains and any grave goods.

Source: Cultural Resources Records and Site Survey Performed by ACE Environmental, LLC. For Vertical Bridge Wireless Site CA-5909A 23992 Woodfern Dr., Pioneer, CA 95666



Chapter 6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings:

A. The proposed project is for a wireless communication facility consisting of a monopine cell tower and associated ground and tower equipment. The project would be designed and constructed in compliance with the existing land use and zoning designations of the subject property, as found in the County’s General Plan 2016 and County Zoning Ordinance. Overall, the construction and operation of this proposed project would not require the creation of a new source of energy construction. During construction there would be a temporary consumption of energy resources required for the movement of equipment and materials; however, the duration is limited due to the type of construction, and the area of construction is minimal. Compliance with local, State, and federal regulations (e.g., limit engine idling times, require the recycling of construction debris, etc.) would reduce short-term energy demand during the project’s construction to the extent feasible, and project construction would not result in a wasteful or inefficient use of energy.

During operation of the wireless communication facility, there are no unusual project characteristics or processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or the use of equipment that would not conform to current emissions standards and related fuel efficiencies. The operation of a wireless communication facility with associated ground and tower equipment would be consistent with State and local energy reduction policies and strategies, and would not consume energy resources in a wasteful or inefficient manner. Therefore, there is **less than significant impact**.

B. Many of the state and federal regulations regarding energy efficiency are focused on increasing building efficiency and renewable energy generation, as well as reducing water consumption and Vehicles Miles Traveled. Future development will need to comply with Title 24 and CalGreen building code standards at the time of construction. Therefore, the proposed project would implement energy reduction design features and comply with the most recent energy building standards if future construction were to take place and would not result in wasteful or inefficient use of nonrenewable energy sources. The only local energy plan is the Energy Action Plan (EAP) which provides incentives for homeowners and business owners to invest in higher-efficiency energy services. The project would not conflict with or obstruct any state or local plan for energy management, therefore there is **no impact**.

Sources: Amador County Planning Department, Amador County Energy Action Plan.



Chapter 7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique geological site or feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

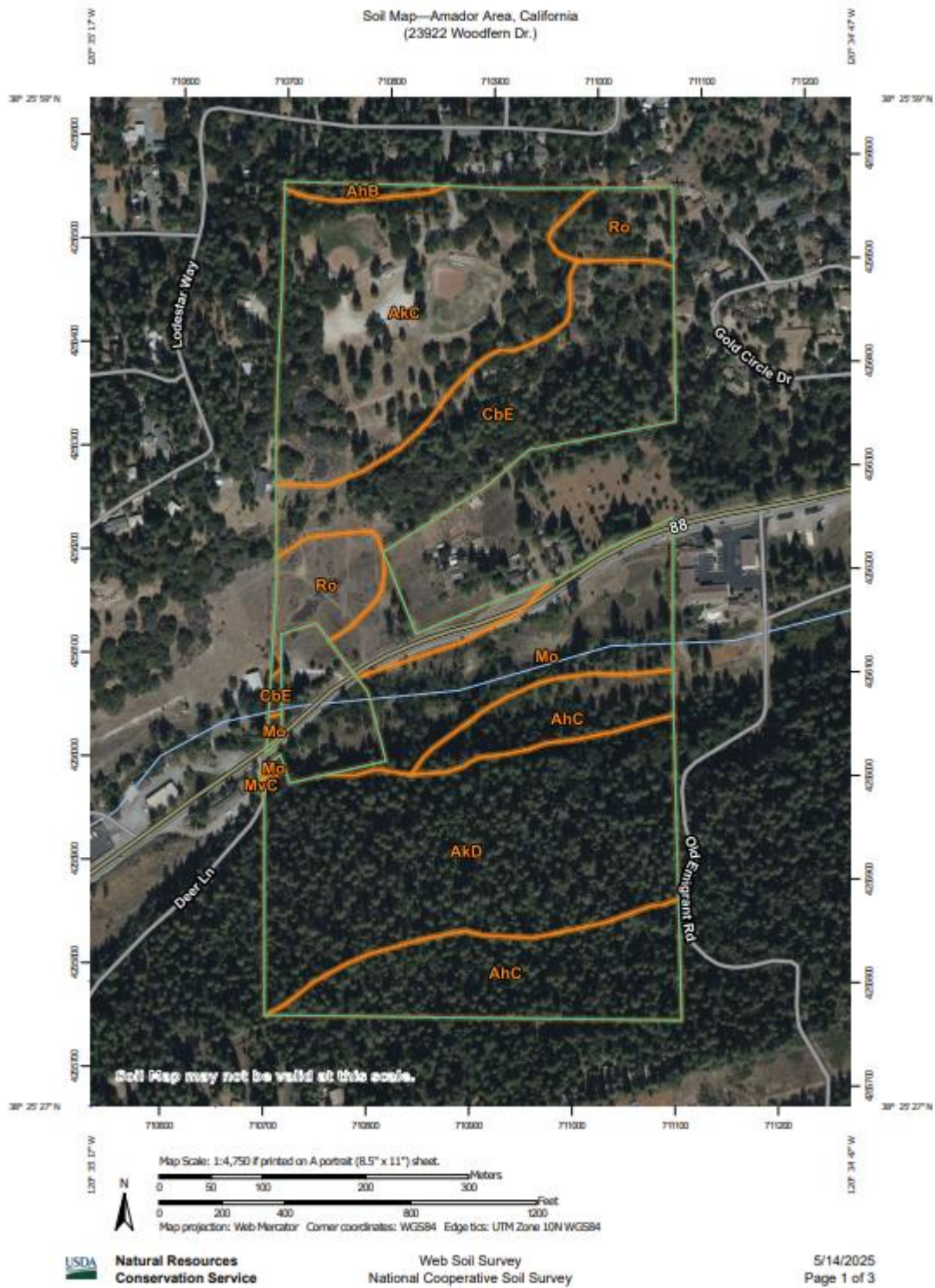


Discussion of Findings:

- A. The project site is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults are located on or adjacent to the property, as identified by the U.S. Geologic Survey mapping system. Therefore, **no impact** would occur.
- B. Property in Amador County located below the 6,000' elevation is designated as an Earthquake Intensity Damage Zone I, Minor to Moderate, which does not require special considerations in accordance with the Uniform Building Code or the Amador County General Plan, Safety, Seismic Safety Element Pursuant to Section 622 of the Public Resources Code (Chapter 7.5 Earthquake Fault Zoning). The State Geologist has determined there are no sufficiently active or well-defined faults or areas subject to strong ground shaking, liquefaction, landslides, or other ground failure in Amador County as to constitute a potential hazard to structures from surface faulting or fault creep. Standard grading and erosion control techniques during grading activities would minimize the potential for erosion resulting in a **less than significant** impact.
- C. The potential construction activities could result in a land disturbance of less than one acre and therefore are not expected to require a Stormwater Pollution Prevention Permit (SWPPP) from State Water Resources Control Board prior to construction. Grading Permits are reviewed and approved by the County in accordance with Ordinance 1619 (County Code 15.40), and they include requirements for erosion and sediment control, including retention of topsoil, resulting a **less than significant** impact.
- D. The issuance of a grading permit, along with implementation of Erosion Control requirements during construction and the stabilized landscaped impervious areas, will minimize potential erosion. At this time, **there are no impacts**.
- E. According to the Natural Resources Conservation Service (NRCS, 2017, the project site is primarily located in an area with: Aiken, Cohasset, and Musick loam and Mixed Alluvial Land (See Figure 7 below). The project would not require the use of a sewer system, nor the use of septic tanks. Due to the current level of site disturbance and development of the property as well as the small project site, **no impact would result**.
- F. The project is not near a unique geologic feature that could be significantly impacted as a result of this project. The proposed project would not destroy or greatly impact any known unique geological site or feature. The project site does not propose additional uses or development inconsistent with current uses of the property. **No impact would result**.



FIGURE 2: SOIL MAP





Soil Map—Amador Area, California
(23922 Woodfern Dr.)

MAP LEGEND		MAP INFORMATION	
<p>Area of Interest (AOI)</p> <ul style="list-style-type: none"> Area of Interest (AOI) <p>Soils</p> <ul style="list-style-type: none"> Soil Map Unit Polygons Soil Map Unit Lines Soil Map Unit Points <p>Special Point Features</p> <ul style="list-style-type: none"> Blowout Borrow Pit Clay Spot Closed Depression Gravel Pit Gravelly Spot Landfill Lava Flow Marsh or swamp Mine or Quarry Miscellaneous Water Perennial Water Rock Outcrop Saline Spot Sandy Spot Severely Eroded Spot Sinkhole Slide or Slip Sodic Spot 	<ul style="list-style-type: none"> Spoil Area Stony Spot Very Stony Spot Wet Spot Other Special Line Features <p>Water Features</p> <ul style="list-style-type: none"> Streams and Canals <p>Transportation</p> <ul style="list-style-type: none"> Rails Interstate Highways US Routes Major Roads Local Roads <p>Background</p> <ul style="list-style-type: none"> Aerial Photography 	<p>The soil surveys that comprise your AOI were mapped at 1:20,000.</p> <p>Warning: Soil Map may not be valid at this scale.</p> <p>Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.</p> <p>Please rely on the bar scale on each map sheet for map measurements.</p> <p>Source of Map: Natural Resources Conservation Service Web Soil Survey URL: Coordinate System: Web Mercator (EPSG:3857)</p> <p>Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.</p> <p>This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.</p> <p>Soil Survey Area: Amador Area, California Survey Area Data: Version 17, Aug 30, 2024</p> <p>Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.</p> <p>Date(s) aerial images were photographed: Oct 3, 2022—Oct 6, 2022</p> <p>The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.</p>	

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
AhB	Aiken loam, 2 to 9 percent slopes, C Lower Montane	0.5	0.7%
AhC	Aiken loam, 9 to 16 percent slopes	10.2	15.1%
AkC	Aiken cobbly loam, 3 to 16 percent slopes	14.9	22.1%
AkD	Aiken cobbly loam, 16 to 31 percent slopes	17.9	26.5%
CbE	Cohasset very cobbly loam, 16 to 51 percent slopes	12.4	18.3%
Mo	Mixed alluvial land	7.5	11.2%
MvC	Musick very rocky sandy loam, 9 to 16 percent slopes	0.0	0.0%
Ro	Rock land	4.1	6.0%
Totals for Area of Interest		67.5	100.0%

Sources: Soil Survey-Amador County; Planning Department; Environmental Health Department; National Cooperative Soil Survey; Amador County General Plan EIR, California Geologic Survey: Alquist-Priolo Earthquake Fault Zones Maps.



Chapter 8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

- A. This project is not anticipated to generate substantial increase in greenhouse gas emissions. Implementation of the project with adherence to local regulations regarding emissions is not foreseen to generate significant greenhouse gas emissions or result in significant global climate change impacts. Emissions are mitigated through implementation of best management practices and adherence to guidelines established through the Amador County General Plan and included under **Mitigation Measures AIR-1 and AIR-2**. There is a **less than significant impact with mitigations incorporated**.
- B. There is no applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Any increase in emissions would comply with regulations and limits established by the California Air Resources Board (CARB) and Amador Air District. Therefore, there is a **less than significant impact**.

Sources: Amador County General Plan, Amador Air District, Amador County Municipal Codes, Assembly Bill 32 Scoping Plan- California Air Resources Board (CARB), Amador County General Plan EIR.



Chapter 9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, or otherwise introduce potential hazards to residents or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment? Or otherwise, be influenced by other notable hazards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



in a safety hazard for people residing or working in the project area?				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

A-B. Construction activities associated with the development of the proposed project would involve the use of potentially hazardous materials, including diesel fuel and other maintenance-related chemical components. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations. In the event of an accidental release, construction personal who are experienced in containing accidental releases of hazardous materials will likely be present to contain and treat affected areas in the event a spill occurs. If a larger spill were to occur, construction personal would generally be on hand to contact the appropriate agencies. Hazardous materials used during construction would ultimately disposed of by a licensed hazardous waste transporter at an authorized and licensed disposal facility or recycling facility.

The proposed project would install a cellular tower, which would emit radiofrequency (RF) energy, a type of electromagnetic energy. RF radiation can be harmful if radiation levels are high enough to heat biological tissue and raise body temperatures. Effects from high levels of RF radiation could cause health problems, such as cataracts or temporary sterility in men (Federal Communications Commission [FCC], 1999). The supply with application evaluation concludes that the proposed project would comply with FCC standards for limiting public exposure to RF frequencies. There were no modeled areas on any accessible ground-level walking/working surface related to the proposed antennas that exceed the FCC’s occupational or general public exposure limits at this site. Impacts due to RF exposure would be **less than significant**.

- C. No schools are located within ¼ mile of the site. The nearest school is Pioneer Elementary School, located approximately 0.5 miles east along Highway 88. No schools would not be exposed to hazardous materials, substances, or waste due to the project, and there would be **no impact**.
- D. The project site does not appear on any hazardous material site lists compiled pursuant to Government Code Section 65962.5. In May 2025, Amador County staff searched the following databases for known hazardous materials contamination at the project site:
 - Superfund Enterprise Management System (SEMS) database
 - Department of Toxic Substances Control’s Envirostor database for cleanup sites and hazardous waste permitted facilities
 - Geotracker search for leaking underground fuel tanks

The project site does not appear on any of the above lists, nor are there any hazardous material contamination sites anywhere near the site. The sites located within Amador County are included under **Figure 3- SEMS Database: Amador County**, however these sites are not located in near proximity to the project site nor would the project impact any of these sites, or present new significant hazards. As such there would be **no impacts**.

E. The proposed project is located outside the compatibility zones for the area airports. The FCC's rules, particularly those found in Part 17 of Title 47 of the Code of Federal Regulations (47 CFR Part 17), govern



the construction, marking, and lighting requirements for antenna structures, including cell towers, to reduce the risk of hazards to air navigation. These regulations include specifications for tower height, lighting, and painting, among other requirements. The FCC regulations regarding tower lighting and marking primarily apply to towers that meet the height threshold of 200 feet (approximately 61 meters) above ground level. Since the tower in question is only 100 feet tall, it would likely not meet the height criteria for mandatory lighting and marking requirements and therefore, would have a **less than significant impact**.

- F. The proposed project is an unmanned facility, so no evacuation and/or emergency response plans are necessary. The proposed project does not include any actions that physically interfere with any emergency response or emergency evacuation plans. Due to the nature of the site as a public park, there is established adequate emergency service and access to the site and this project does not conflict with any existing infrastructure or plan. Due to the surrounding topography and height of the tower, there would be **less than significant impact** to emergency responses.
- G. The project site is located in a non-urbanized area and is within a high fire hazard zone, according to CAL FIRE’s Fire Hazard Severity Zone map for Amador County (2024). The proposed project is an unmanned facility and development of the proposed project would add a small amount of trips onto the area roadways; however, area roadways and intersections would continue to operate at an acceptable level of service. **There is less than significant impact** related to risk of wildland fires.

FIGURE 3- SEMS DATABASE: AMADOR COUNTY

SEMS EPA ID ↓ ∇	Facility Information	SITE NAME ↓ ∇	ADDRESS	COUNTY ↓ ∇
CAD980696033	View Facility Information	AMADOR COUNTY LDFL	IONE-BUENA VISTA RD 3 MI S OF IONE, CA 95640	AMADOR
CAD009221003	View Facility Information	AMERICAN FOREST PROD CO	HWY 49 MARTELL, CA 95654	AMADOR
CAD983650011	View Facility Information	ARGONAUT MINE	ARGONAUT LANE JACKSON, CA 95642	AMADOR
CAD982401143	View Facility Information	CALTRANS MAINTENANCE YARD	END OF DEPOT RD IONE, CA 95640	AMADOR
CA0000726539	View Facility Information	CENTRAL EUREKA MINE	HWY 49 AT BRYSON DR. SUTTER CREEK, CA 95685	AMADOR
CAN000920217	View Facility Information	HARRAH'S CASINO MERCURY SPILL	4640 Coal Mine Road IONE, CA 95640	AMADOR
CAD982403479	View Facility Information	KENNEDY MINE	BTWN JACKSON GATE & NEW YORK RANCH RD JACKSON, CA 95642	AMADOR
CA0002059483	View Facility Information	MOTHER LODE PLATING	HIGHWAY 88 AND MARTIN ROAD IONE, CA 95640	AMADOR

Sources: Amador County Planning Department, Amador County Environmental Health Department, Superfund Enterprise Management System database (SEMS), Department of Toxic Substances Control Envirostor database, Geotracker, California State Water Control Board (CA SWRBC), California Stormwater Quality Association (CASQA), Local Hazard Mitigation Plan (LHMP).



Chapter 10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate or pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows or place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In a flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation or increase risk of such inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Discussion of Findings:

- A. The proposed project would install a cellular antenna tower on a vacant portion of an existing public property owned and operated by Amador County Recreation Agency (ACRA). Construction of the proposed project would include an approximate 1200 sq. ft. lease area with 8 ft.-high fenced compound enclosing the tower and several cabinets on a 5 ft. by 9 ft. concrete pad, which would increase the impermeable surfaces on-site. The graded pad would be a minor increase in ground coverage and would not produce contamination or sediment conveyance that would violate water quality standards. The wireless communications facility would be unmanned and no additional water demand is proposed with this project. Through adherence to construction standards, including erosion and sediment control measures, water quality and waste discharge standards will not be violated. Therefore, impacts to water quality or waste discharge would be **less than significant**
- B. The project is unlikely to significantly impact groundwater supplies via extraction or the creation of extensive hard surfaces as the proposed project would not require the use of, or otherwise interfere with, groundwater supplies. **There are no impacts** to groundwater.
- C. In addition to the tower, several cabinets and other associated equipment is proposed within the 1,200 ft. fenced lease area.. The proposed project would require a minimal amount of ground disturbance and the minor amount of site disturbance would not alter absorption rates or drainage patterns. Therefore, **impacts would be less than significant.**
- D. Pioneer's elevation is approximately 3000 ft above sea level and the additional 100-foot height of the tower indicate that it will not be subject to inundation by seiche, tsunami, or mudflow. The project site falls within Zone X, which is determined to be outside designated floodplains, as mapped by the Federal Emergency Management Agency (2010). The project will not expose significant risk of loss, injury, or death to people or structures, nor is it located near a levee or a dam. **No impact** would result.
- E- G. This project does not impact water quality nor is it in near proximity to a levee or dam, or associated systems which would have the capacity to affect or be affected by this project or its implementation. Amador County does not have a water quality control plan or sustainable groundwater management plan. **No impact** would result.

Sources: Amador County Environmental Health, Transportation and Public Works Department.



Chapter 11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings:

- A. The surrounding parcels range in size from less than 1 acre to 20 acres in size with primarily residential uses, excepting the parcels along the highway which is a mix of commercial, residential, and industrial. The project parcel is currently occupied by Mollie Joyce Community Park, which serves as a recreation facility for the community of Pioneer. The proposed project would include the installation of a cellular antenna tower and would not divide an established community. This project will not result in any physical barriers that will divide the existing community. **No impact** would result.
- B. The project parcel is designated by the General Plan as PS, Public Service and is zoned R1, Single-Family Residential. Section 19.48.150 of the Zoning Ordinance requires new telecommunication facilities to have a minimum building setback from all property lines and public road rights-of-way equal to the height of the facility. The proposed 100-foot tower is located approximately 300 ft. from the western property line and approximately 700 ft. from the northern property line which includes the access from Woodfern Dr. The tower is also more than 800 ft. from Highway 88, which bisects the project parcel separating the park area from the undeveloped southern portion of the parcel. The project is consistent with the PS General Plan land use designation, the R1 zone district of the project site and is consistent with Chapter 19.48.150 of the Amador County Code, "Commercial Wireless Service Facilities," so **no impact** would result.

Sources: Amador County General Plan and General Plan EIR, Amador County Municipal Code 19.48.150, Amador County GIS



Chapter 12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings:

A & B General Plan Mitigation Measure 4.6-8b, Development Project Evaluation, requires the County to evaluate development proposals for compatibility with nearby mineral extraction activities and mapped resources to reduce or avoid the loss of mineral resource availability.

This project will not encroach onto any of the other properties and therefore not interfere with any present or future access to known mineral resource areas. Mineral resources are separately referenced in the deed to the property; therefore, any separate ownership or mineral rights shall remain unaffected by this project. The California Geological Survey (CGS) has classified the project site as not being located in any Mineral Resource Zone. Additionally, the project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The project site is not identified in the General Plan Minerals Element as containing a locally-important mineral resource nor would the proposed project use or extract any mineral or energy resources and would not restrict access to known mineral resource areas. There are no proposed changes in use besides the request for the use permit, therefore there is **no impact** to any mineral resources.

Sources: Planning Department, Amador County General Plan and General Plan EIR.



Chapter 13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings:

- A. Uses associated with this project would not create a significant increase in ambient noise levels established in the local general plan, other than temporary construction noise. Operation of the proposed project may generate a small amount of noise associated with the low frequency “hum” of the cell tower. The allowable exterior noise limits for utilities is 75 decibels per the Amador County General Plan Land Use Compatibility for Community Noise Environments table N-3. As a result, no further consideration of equipment noise mitigation measures would be warranted for this project. Noise levels generated during normal operation would not exceed applicable noise standards established in the General Plan. **Impacts would be less than significant.**
- B. The proposed project would not include the development of land uses that would generate substantial ground-borne vibration or noise or use construction activities that would have such effects. No structures are proposed that would require heavy footings where the use of heavy pile drivers would be required. **Impacts would be less than significant.**
- C. There are no nearby public or private airports. **No impact** would result.

Sources: Planning Department, Environmental Noise Assessment - Bollard Acoustical Consultants, Inc. (2024) Amador County General Plan and General Plan EIR.



Chapter 14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings:

A & B The proposed project would not result in the loss of existing housing or cause a significant increase in the local population that would displace existing residents, necessitating the construction of additional housing. The proposed project would not take away the potential of housing construction on the project parcel. **There are no impacts.**

Sources: Amador County Planning Department.



Chapter 15. PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion of Findings:

- A. The project site is located in and served by the Amador Fire Protection District. The nearest fire station is located at 23770 Van De Hei Ranch Rd, less than 500 ft. from the project site. Proposed improvements would not result in significant additional demand for fire protection services. As such, the proposed project would not result in the provision of or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. A **less than significant impact** related to fire protection services would occur.
- B. The project site is currently served by the Amador County Sheriff’s Department. The nearest Sheriff’s Office is located at 700 Court St. The project site is located approximately 30 miles (driving distance) from the Sheriff’s station. However inter-agency service agreements coordinates emergency response between the Sherriff’s office and California Highway Patrol (CHP), increasing police presence countywide. The proposed project would not result in additional demand for sheriff protection services. **No impact** related to police protection services would occur.
- C-E. The proposed cell tower installation project would not increase the number of residents in the County, as the project does not include residential units. Because the demand for schools, parks, and other public facilities is driven by population, the proposed project would not increase demand for those services. As such, the proposed project would result in **no impacts** on these public services.

Source: Amador Fire Protection District, Sheriff’s Office, Amador County Unified School District, Recreation Agency, Planning Department.



Chapter 16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

A&B The proposed cell tower installation project would not generate population that would increase demand for parks or recreational facilities. The project parcel is utilized as a recreational facility and the expansion of use to include the Project is not going to reduce the utility of the site for recreational purposes. The use of the recreational facility to house the wireless service facility is considered a compatible use to accompany the parcels Public Service uses, and therefore, the proposed project would not affect use of existing facilities, nor would it require the construction or expansion of existing recreational facilities. Therefore, the proposed project would have a **less than significant impact** on recreational facilities.

Source: Amador County Planning Department.



Chapter 17. TRANSPORTATION / TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

A. The General Plan Mitigation Measure 4.14.1 requires the County to evaluate discretionary development proposals for their impact on traffic and transportation infrastructure and provision of alternative transportation, and requires applicants/ developments to pay into the traffic mitigation fee program(s) to mitigate impacts to roadways. The County will require future projects to conduct traffic studies (following Amador County Transportation Commission guidance). The purpose of these traffic studies will be to identify and mitigate any cumulative or project impacts (roadways below the County’s standard of Level of Service “C”, beyond the limits of the mitigation fee program(s). Projects will be required to pay a “fair share” of those improvements that would be required to mitigate impacts outside the established mitigation fee program(s). The objective of this program(s) is to substantially reduce or avoid traffic impacts,



including cumulative impacts, of development which would occur to implement the General Plan. The project does not conflict with any plan, ordinance, or policy establishing measure of effectiveness for the performance of the circulation system. The proposed project would not cause a substantial increase in traffic, reduce the existing level of service, or create any additional congestion at any intersections. The proposed facility would require periodic maintenance, involving about one to two vehicle trips per month. As such, level of service standards would not be exceeded and the project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Impacts would be **less than significant**.

- B. The proposed project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). **No impact** would result.
- C. The proposed project does not include any design features that would create a hazard, such as sharp turns in the access road and would be required to obtain an encroachment permit onto a County maintained road. Therefore, **no impact** would result.
- D. The project will not increase hazards to existing roads or incompatible uses due to the project site being in an unused corner of a 0.43-acre parcel. Impacts would be **less than significant**.

Sources: Amador County Planning



Chapter 18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

Tribal cultural resources” are defined as (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 These may include non-unique archaeological resources previously subject to limited review under CEQA. Assembly Bill 52, which became effective in July 2015, requires the lead agency (in this case, Amador County) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the



California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code Section 21080.3.1[b]).

A As defined by Public Resources Code section 21074 (a) there were no tribal cultural resources identified in the project area; therefore, the project would not cause a substantial adverse change in any identified tribal cultural resources. Additionally, all tribes requesting notification for discretionary project submissions were notified of this project proposal. Any identified cultural resources or potentially significant resources would be preserved and avoided by future development consistent with the provisions of the General Plan (2016). Impacts to Tribal Cultural Resources on this site are **less than significant**.

Sources: Amador County Planning Department, California Public Resources Code; National Park Service National Register of Historic Places, North Central Information Center Records, Department of Parks and Recreation Record (2020), UAIC Recommendations (Attachment 1).



Chapter 19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded systems (causing significant environmental effects):				
i. Water or wastewater treatment facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Stormwater drainage facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Electric power facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Natural gas facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Telecommunications facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have sufficient water supplies available to serve the project from existing entitlements and resources (for the reasonably foreseeable future during normal, dry, or multiple dry years), or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs while not otherwise impairing the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

A-C The proposed project would not require any water or wastewater service. Therefore, the project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in the expansion of water or wastewater treatment facilities. Therefore, **no impact** related to these utilities and service systems would occur.



D-E The installation of a cellular tower would generate a minimal amount of construction waste. Currently there are no active landfills in the county; however, the County's waste service provider, Republic Waste Services, Inc., has a transfer station in Pine Grove which has sufficient capacity to accommodate any additional solid waste produced through the implementation of this project. In addition, the proposed project would comply with federal, state, and local regulations regarding solid waste. Impacts would be **less than significant**.

Source: Amador County General Plan and General Plan EIR; Environmental Health Department; Planning Department



Chapter 20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Findings:

- A. There would be no lane closures involved in the proposed project that would constrict emergency access or interfere with an emergency evacuation plan. There is **no impact**.
- B. The project does not exacerbate wildfire risks through change in slope, prevailing winds, or other factors. In 2017, the state of California adopted an Emergency Plan, which outlines how the state would respond in an event of natural or man-made disaster. The project would not interfere with this plan. The project is not anticipated to affect existing emergency access or access to nearby uses. Therefore, there is a **less than significant impact**.
- C. The project would require the installation and maintenance of associated infrastructure that may exacerbate fire risk. Conforming to all standard Fire Safety Regulations as determined by Amador County Fire Protection District and California Building Codes will result in a **less than significant impact**.
- D. The project will not expose people or structure to any new significant risks regarding flooding, landslides, or wildland fire risk. The project is located in a High Fire Risk Zone and therefore, shall conform to all standard Fire Safety Regulations as determined by AFD and California Building Code. The project site is approximately 200 feet from the fire station, and therefore will not require any increased fire protection due to the project's change in use. There is a **less than significant impact**.

Source: Amador County Planning, Amador County Office of Emergency Services.



Chapter 21. MANDATORY FINDINGS OF SIGNIFICANCE

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively are considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion/Conclusion/Mitigation:

- A. The implementation of the Mitigation Measures identified through this Initial Study would result in less than significant impacts to the chapters mentioned above. Therefore, the project will not degrade the quality of the environment and no habitat, wildlife populations, and plant and animal communities would not be greatly impacted. All environmental topics are either considered to have "No Impact," "Less Than Significant Impact," or "Less than Significant Impacts with Mitigation Incorporated."

Mitigations included through this Initial Study are listed as follows:

- AES-1 Monopine Design.**
- AES-2 Standard Lighting Regulations.**
- AIR-1 Air Quality Best Management Practices (BMPs).**
- AIR-2 Generator Emission Permits.**
- Bio-1 Wetland and Riparian Conservation.**
- Bio-2 Ground Disturbance Timing for Nesting Birds.**



CULTR-1 Paleontological or Historical Resources
CULTR-2 Human Remains
CULTR-3 Future Identification of Cultural Resources

With implementation of the Mitigation Measures, impacts would be **less than significant with mitigation incorporated.**

- B. No past, current, or probable future projects were identified in the project vicinity that, when added to project-related impacts, would result in cumulatively considerable impacts. No cumulatively considerable impacts would occur with development of the proposed project. As discussed in the analyses provided in this Initial Study, project impacts were found to be less than significant. The incremental effects of the proposed project are not cumulatively significant when viewed in context of the past, current, or probable future projects. No cumulative impacts would occur. The intent of the project is to improve cellular coverage for existing and future wireless customers. The proposed project is consistent with the Amador County General Plan. **Impacts would be less than significant.**
- C. There have been no impacts discovered through the review of this application demonstrating that there would be substantial adverse effects on human beings either directly or indirectly. With implementation of mitigation measures included in this Initial Study, these impacts would be **less than significant.**

SOURCE: Chapters 1 through 20 of this Initial Study.

REFERENCES Amador County General Plan; Amador County General Plan EIR; Planning Department; Amador Air District; Amador County Municipal Codes; Amador County Important Farmland Map, 2024; National Wetland Inventory; Fish & Wildlife's IPAC and BIOS databases; Migratory Bird Treaty Act; California Air Resources Board; California Department of Conservation; California Department of Forestry and Fire Protection; California Geologic Survey; Alquist-Priolo Earthquake Fault Zones; State Department of Mines & Geology; Ace Environmental, LLC.; Kidd Biological, Inc.; North Central Information Center; Amador County GIS; Amador County Zoning Map; Amador County Municipal Codes; Amador County Soil Survey; Amador Fire Protection District; Caltrans District 10 Office of Rural Planning; Commenting Department and Agencies. All sources cited herein are available in the public domain, and are hereby incorporated by reference.

NOTE: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal. Appl. 4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th at 1109; *San Franciscans Upholding the Downtown Plan v. city and County of San Francisco* (2002) 102 Cal. App. 4th 656.