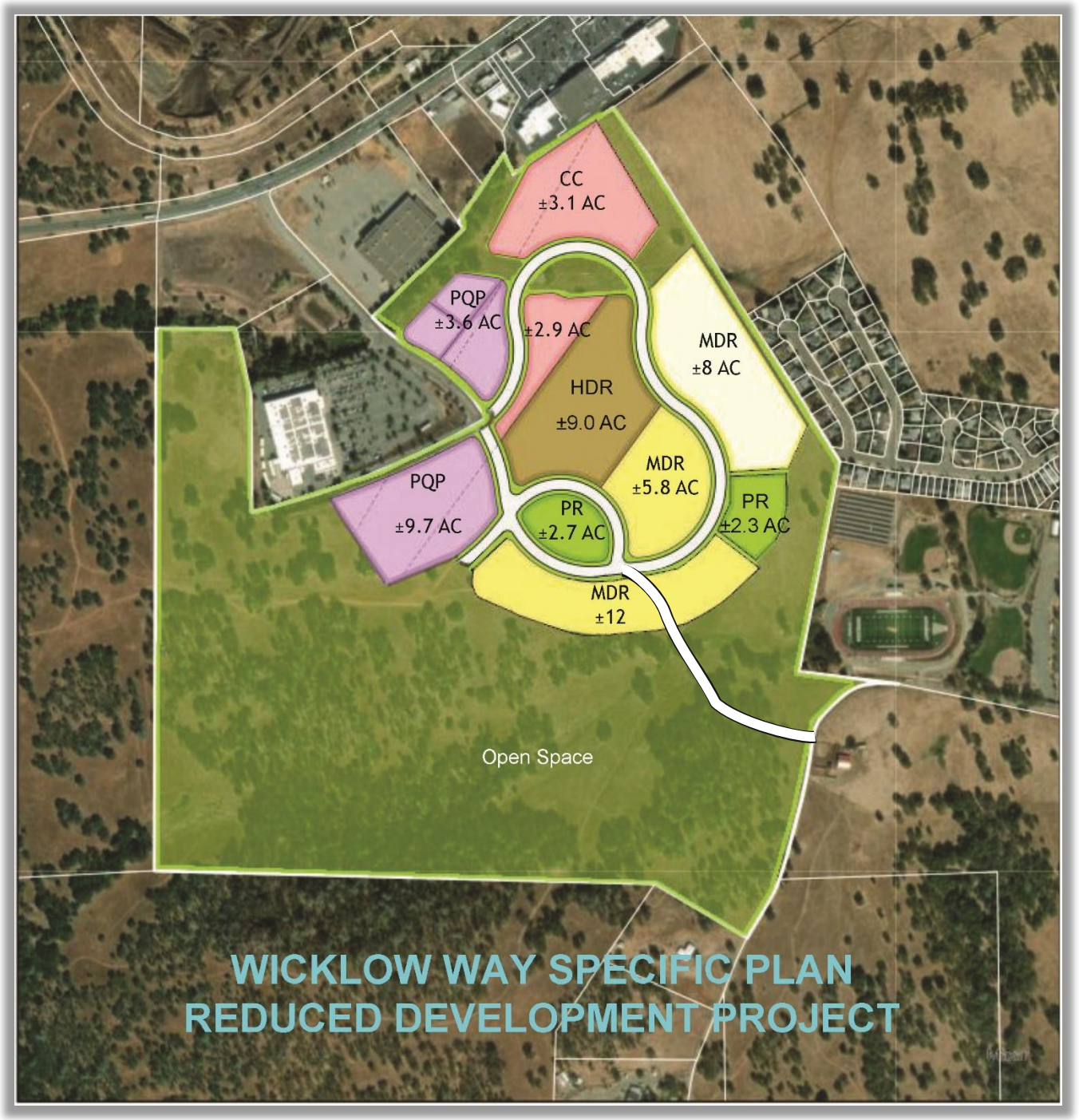
FINAL ENVIRONMENTAL IMPACT REPORT

WICKLOW WAY SPECIFIC PLAN
REDUCED DEVELOPMENT PROJECT
JUNE 2026



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WICKLOW WAY SPECIFIC PLAN
REDUCED DEVELOPMENT PROJECT
SCH# 2023010563

JUNE 2026

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ABBREVIATIONS AND ACRONYMS

The following is a list of abbreviations and acronyms found within this document's text and Appendix B MMRP:

AAD	Amador Air District
AB	Assembly Bill
ACES	Amador County Environmental Service
ACTC	Amador County Transportation Commission
ACUSD	Amador County Unified School District
ADA	Americans with Disabilities Act
AFPD	Amador Fire Protection District
AFY	Acre-Feet Per Year
ALUCP	Airport Land Use Compatibility Plan
ARSA	Amador Regional Sanitation Authority
ATC	Authority to Construct
ATCM	Asbestos Airborne Toxic Control Measure
AWA	Amador Water Agency
AWS	Amador Water System
BACT	Best Available Control Technology
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFD	Community Facilities District
cfs	Cubic Foot per Second
CHK Act	Cortese Knox Hertzberg Local Government Reorganization Act of 2000

CHP	California Highway Patrol
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
County	Amador County
CC&Rs	Convenants, Conditions, and Restrictions
CDLF	California Red-legged Frog
CRHR	California Register of Historic Resources
CSA	Community Service Area
dBA	A-Weighted Decibel
dbh	Diameter at Breast Height
DDW	Division of Drinking Water
DEIR	Draft Environmental Impact Report (also referred to as Draft EIR)
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EV	Electric Vehicle
FAA	Federal Aviation Administration
FICON	Field Condition
FEIR	Final Environmental Impact Report (also referred to as Final EIR)
FYLF	Foothill Yellow-legged Frog
GHG	Greenhouse Gas
HCD	Department of Housing and Community Development
HDR	High Density Residential
HRA	Health Risk Assessment
ITE	Institute of Transportation Engineers
LAFCO	Local Agency Formation Commission
LDR	Low Density Residential
LED	Light-Emitting Diode
LID	Low Impact Design
LOS	Level of Service
LSAA	Lake and Streambed Alteration Agreement
LST	Localized Significance Threshold

MBTA	Migratory Bird Treaty Act
MCAB	Mountain Counties Air Basin
MDR	Medium Density Residential
MGD	Million Gallons Per Day
MLD	Most Likely Descendent
MM	Mitigation Measures
MMRP	Mitigation Monitoring and Reporting Program
MT CO_2e	Metric Tons of Carbon Dioxide Equivalent
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
ND	Negative Declaration
NOA	Naturally Occurring Asbestos
NOA	Notice of Availability
NOD	Notice of Determination
NOP	Notice of Preparation
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
OPR	Office of Planning and Research
P/QP	Public/Quasi-Public
PRC	Public Resources Code
PRMTP	Paleontological Resource Mitigation and Treatment Plan
PTO	Permit to Operate
PRC	Public Resources Code
RAW	Remedial Action Workplan
RHNA	Regional Housing Needs Allocation
ROG	Reactive Organic Gases
ROW	Right-of-Way
RSC	Regional Service Center
RTMF	Regional Traffic Mitigation Fee
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SGMA	State Ground Water Management Act
SIP	State Implementation Plan

SOI	Secretary of the Interior
SR	State Route
STC	Sound Transmission Class
SVP	Society of Vertebrate Paleontology
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
TCR	Tribal Cultural Resource
USGS	United States Geological Service
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VFMP	Valley Fever Management Plan
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
WEAP	Worker Environmental Awareness Program
WSA	Water Supply Assessment
WTP	Water Treatment Plant
WWSP	Wicklow Way Specific Plan
WWTP	Wastewater Treatment Plant

1.0 INTRODUCTION

1.1 PURPOSE AND INTENDED USE OF THE FINAL EIR

This Final Environmental Impact Report (FEIR or Final EIR) has been prepared by Amador County (County), the Lead Agency under the California Environmental Quality Act (CEQA) [Public Resources Code (PRC), Section (§)21000 et seq.; California Code of Regulations (CCR) Title 14 §15000 et seq. (CEQA Guidelines)] pursuant to 14 CCR §15000, which requires a public agency with discretionary authority to evaluate the environmental impacts of its action. As such, the County has the principal responsibility for approving the proposed Wicklow Way Specific Plan (WWSP) and Environmental Impact Report (EIR) and is the Lead Agency under CEQA (PRC §21067; 14 CCR §15367).

Under CEQA, the County must identify and consider the potentially significant environmental effects of the actions proposed before making a final decision to approve the proposed project. This FEIR will be used in the planning and decision-making process by the County Planning Commission and Board of Supervisors and other responsible and trustee agencies.

A Draft EIR (DEIR) for the proposed project was circulated for public review and comment between July 3, 2024, through August 16, 2024 (State Clearinghouse Number: 2023010563).

As described in CEQA Guidelines §15089, the Lead Agency must evaluate comments received on the DEIR, prepare written responses, and consider the information contained in an FEIR before approving a project. The purpose of an FEIR is to provide an opportunity for the Lead Agency to respond to comments made by the public, stakeholders, and regulatory agencies. Pursuant to CEQA Guidelines §15132, an FEIR consists of:

(a) the DEIR or a revision of the DEIR;

(b) comments and recommendations received on the DEIR, either verbatim or in summary;

(c) a list of persons, organizations, and public agencies commenting on the DEIR;

(d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

(e) any other information added by the Lead Agency.

This FEIR constitutes the second part of the EIR for the WWSP Project and is intended to be a companion to the DEIR. The DEIR for the project constitutes the first part of the EIR and is incorporated by reference; refer to: https://www.AmadorCounty.gov/Departments/Planning/Current-Projects/Wicklow-Way-Specific-Plan. Thus, the complete EIR for the WWSP Project is comprised of the DEIR, DEIR Appendices, and the FEIR.

1.2 ORGANIZATION OF THE FINAL EIR

The Final EIR is organized into the following sections:

SECTION 1.0: INTRODUCTION. Describes the purpose and intended use of the FEIR, organization of the FEIR, and the contents of each FEIR section.

SECTION 2.0: WWSP BACKGROUND, FEIR CERTIFICATON, AND SPECIFIC PLAN ADOPTION. Provides a chronological history of the preparation of the WWSP and EIR, steps related to finalizing the WWSP and FEIR, the

goals and objectives of the WWSP, a refined description of the WWSP Reduced Development Project, a comparison of the proposed WWSP and the WWSP Reduced Development Project, and an explanation for the future use of the FEIR for WWSP developer proposals.

SECTION 3.0: COMMENTS. Includes a list of each individual or entity that commented on the DEIR, all comment letters/e-mail correspondence, and the minutes from the August 13, 2024, Planning Commission Public Comment Hearing; individual comments are marked for response tracking and are included in Appendix A.

SECTION 4.0: RESPONSES TO COMMENTS. Presents Master Responses that address topics that apply to numerous comments received on the DEIR and a matrix identifying each commentor, comment letter/hearing minutes, comment number, comment summary, and a response to each comment.

APPENDIX A: MARKED COMMENTS. This section includes all of the comment letters and e-mails received on the DEIR, which have been marked with item numbers used as coding for the responses.

APPENDIX B: MITIGATION MONITORING AND REPORTING PROGRAM. Includes the Final Mitigation Monitoring and Reporting Program (MMRP) for the WWSP EIR. The MMRP is the document that will be used by the County and enforcement and monitoring agencies responsible for the implementation of the Project's mitigation measures (MMs) listed by environmental topic. The MMRP identifies each MM, applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

All documents and other information that constitute the public record for this project shall be maintained by the County and shall be available for public review at the following address:

Amador County, Planning Department, 810 Court Street, Jackson, CA 95642

1.3 MITIGATION MONITORING AND REPORTING PROGRAM

PRC §21081.6 and State of California (State) CEQA Guidelines §15097, Mitigation Monitoring or Reporting, require public agencies to establish monitoring or reporting programs for environmental findings related to an EIR. Accordingly, as Lead Agency, the County has prepared an Mitigation Monitoring and reporting Program (MMRP) for the WWSP Reduced Development Project, which is included in Appendix B of this FEIR.

1.3.1 INTRODUCTION

The CEQA requires a MMRP for projects where mitigation measures are required to address project impacts and thus, become conditions of project approval. As described above, the County Planning Department prepared the WWSP DEIR in June 2024. Following direction from the DEIR public hearing in August 2024, the County is now advancing the Reduced Development Project which would reduce the number of residential units to 377 and accommodate approximately 830 residents. The reduced scale of the Reduced Development Project still meets the County's Regional Housing Needs Allocation commitment and the original objectives of the WWSP to provide a planned community that supports housing, jobs, community amenities, preserves open space and rural character and is better suited to meeting changing County demographics.

1.3.2 PURPOSE OF THE MMRP

This MMRP has been prepared in conformance with CEQA (PRC §21081.6) and CEQA Guidelines § 15097. This MMRP is based on the information and mitigation measures contained in the WWSP EIR. Pursuant to PRC §21081.6(b), each of the mitigation measures identified in the MMRP will be included as enforceable permit

conditions terms in any permit issued by the County for the implementation of any of the land uses identified in the WWSP. The purpose of this MMRP is to:

- Verify compliance with the mitigation measures identified in the EIR;
- Provide a framework to document implementation of the mitigation measures included in the EIR;
- Provide a record of mitigation requirements;
- Identify monitoring and enforcement agencies;
- Establish and clarify administrative procedures for the clearance of mitigation measures;
- Establish the frequency and duration of monitoring; and
- Utilize the existing agency review processes wherever feasible.

Future developers implementing any of the land uses identified in the Reduced Development Project shall be responsible for implementing each mitigation measure and shall be obligated to provide verification to the appropriate monitoring and enforcement agencies that each mitigation measure has been implemented. The developers shall maintain records demonstrating compliance with each mitigation measure. Such records shall be made available to the County Planning Department or other responsible agency, upon request.

1.3.3 ORGANIZATION

As shown in the following table, each mitigation measure for the Reduced Development Project is listed and categorized by impact area, with identification of:

- Implementation Schedule – The phase of the Project during which the mitigation measure shall be monitored; relevant phases include pre-construction, construction, and operation and maintenance.
- Responsible Party – The party responsible for implementing each mitigation measure and providing verification of implementation.
- Monitoring/Enforcement – The agency, or agencies, responsible for monitoring the compliance and implementation, and enforcement of the mitigation measure.

1.3.4 MMRP MODIFICATION

Minor changes and modifications to the MMRP are permitted, subject to County Planning Department approval. The County Planning Department, in conjunction with other responsible appropriate agencies, as identified in the mitigation measures and the MMRP, will determine the adequacy of any proposed change or modification, and whether the change or modification requires additional environmental review. In transferring the mitigation measures from the DEIR to the MMRP, the County has made limited editorial changes to make future implementation, tracking, and monitoring more efficient. Other future changes may include eliminating duplication of within mitigation measures that include the same of similar requirements.

2.0 WWSP BACKGROUND, FEIR CERTIFICATON, AND SPECIFIC PLAN ADOPTION

2.1 SPECIFIC PLAN DEVELOPMENT AND EIR PROCESS

The WWSP property has been the subject of several County government, commercial, and residential development proposals dating back to 1970. The County acquired the 201-acre site in 2010. Due to unforeseen circumstances, as explained below, preparation of the WWSP and the WWSP EIR has occurred over an extended period of time.

2.1.1 INITIATION OF THE WWSP

In 2021, as part of the State's goal to create more affordable housing opportunities, the County was awarded two planning grants to prepare a Specific Plan and an EIR to facilitate housing, civic, community, commercial, and public services on the WWSP site. The County contracted with a team of third-party environmental planners to prepare these documents. The WWSP was originally drafted and released in 2021, and a community meeting was held on December 9, 2021, to receive public input.

2.1.2 NOTICE OF PREPARATION RELEASED IN EARLY 2023

Following the December 2021 meeting, because of concerns related to confirmation of public school enrollment/capacity and availability of potable and wastewater services to meet future demands from the implementation of the WWSP, the County decided to delay further analysis until sufficient information was available. In early 2023, the County re-engaged the third-party planning team to prepare and circulate a Notice of Preparation (NOP) for the WWSP EIR to receive public, stakeholder, and agency input on the scope of the EIR. Comments were received and are included in Appendix A. However, following the receipt of the NOP comments, due to similar reasons as the 2021 delay, moving forward with the WWSP EIR was delayed a second time.

2.1.3 DRAFT EIR AND WWSP RELEASED IN JUNE 2024

After the second delay from 2023-2024, the County again directed the third-party environmental planning team to resume the preparation of the WWSP DEIR. The Draft WWSP and DEIR were completed and circulated for a 45-day public review and comment period culminating in a public comment hearing held before the County Planning Commission on August 13, 2024. The 2024 WWSP and WWSP EIR evaluated 700 residential units, commercial space community amenities, and public services, including a new on-site wastewater treatment plant (WWTP), fire station, and elementary school to meet the WWSP residential population.

2.2 FINALIZING THE WWSP AND FINAL EIR COMMENCING DECEMBER 2025

Following the August 2024 Planning Commission hearing, advancing the WWSP and finalizing the WWSP EIR were put on hold a third time due to funding constraints. In the summer of 2025, the County secured additional funding to finalize the WWSP and EIR and released a competitive request for proposals to third-party environmental planning teams to complete the WWSP and EIR process. The County intends to complete the WWSP adoption and FEIR certification process so that the WWSP can be used to guide future development. The WWSP objectives were presented in the DEIR and are reiterated for emphasis below to reassert the importance of these objectives for the public, stakeholders, and decision-makers to understand how a project that meets

these objectives will align with changing demographics and economic demands facing the County over the next 20 to 30 years.

- **Complete comprehensive planning for the WWSP Site**. Formulate a specific plan, related documents, and required regulatory approvals to address Amador County regional growth that is compatible with surrounding uses and provides housing, adequate public services, and economic development opportunities.
- **Mix of land uses.** Create a comprehensively planned, residential-based community that balances residential and commercial development, parks, public services, public/quasi-public uses, open space, and preserves biological resources and rural character.
- **General plan consistency.** Achieve compatibility with the vision for the WWSP site contained in the County's adopted General Plan, including neighborhood connectivity, commercial, parks, and open space uses.
- **Housing opportunities.** Provide varying densities and housing types to respond to market demands, including market-rate-purchase, rental, and affordable housing units consistent with the General Plan.
- **Regional Housing Needs Allocation.** Aid the County in meeting its obligation to accommodate a percentage of future regional population growth [as embodied in the Regional Housing Needs Allocation (RHNA) identified by the California Department of Housing and Community Development (HCD)] by increasing residential stock.
- **Community form.** Shapes the physical form and character of development so that the WWSP site is functional, creates a sense of place, and has a connection to existing commercial, and residential development.
- **Organize neighborhoods.** Incorporate multi-model transportation and walking links to commercial, park, and open space uses, as well as the existing adjacent school.
- **Area roadways**. Provide a safe and efficient circulation system that interconnects and promotes pedestrian and bicycle circulation to existing and new commercial, residential, and public uses.
- **Open space.** Preserve existing open space, create new amenities, preserve rural character, biological and natural resources, and oak trees for regional benefit.
- **Fiscal contribution.** Include a mix of land uses, public services, and facilities that are fiscally feasible, and implement funding mechanisms to maintain a neutral/positive fiscal impact to the County's General Fund.
- **Long-Term Growth.** Plan for long-term growth that can guide and meet market demands over a 20- to 30-year horizon.

2.3 MOVING FORWARD – REDUCED DEVELOPMENT WWSP AND FEIR

In response to public, stakeholder, and agency comments, as well as input received during the August 2024 Planning Commission DEIR hearing, County staff opted to reduce the size of the WWSP by approximately 50% equivalent to DEIR Alternative #4, which was also identified as the Environmentally Superior Alternative. The WWSP Reduced Development Project is now being advanced for consideration by County decision-makers for approval. The WWSP Reduced Development Project reduces the intensity of land uses identified in the originally proposed WWSP Project while still providing residential units, community, and commercial services to meet shifts in County demographic and economic trends over the next 20 to 30 years.

2.3.1 COMPARISON OF REDUCED DEVELOPMENT WWSP AND ORIGINAL WWSP

Like the originally proposed WWSP, the WWSP Reduced Development Project is planned to be built-out over a 20- to 30-year period but is a smaller development concept that: will connect to existing potable and wastewater facilities to meet on-site demands; eliminate the on-site WWTP and elementary school; eliminate the low density residential housing; focus on providing market-rate and affordable housing; allow for flexibility to increase the acreage for the preservation of natural and public open space resources; and maintain rural character.

Adopting the WWSP Reduced Development Project will address several comments received on the DEIR. At full build-out, the Reduced Development Project would provide approximately 377 residential units, which meets the County's RHNA commitment and would accommodate approximately 830 residents. Table 2-1 compares the land uses between the Reduced Development Project and the originally proposed WWSP. The Reduced Development Project will eliminate the low-density residential development, as well as the need to have an on-site WWTP and a new elementary school, which will result in providing additional open space that can be dedicated to the protection of natural resources and maintaining the sense of rural character. The reduced scale of the Reduced Development Project will still meet the original objectives of the WWSP to provide a planned community that supports housing, jobs, and community amenities and is better suited to meeting changing County demographics. Table 2-2 presents an expanded comparison of the number of residential units and acreages dedicated to each type of land use.

TABLE 2-1 COMPARISON OF WWSP REDUCED DEVELOPMENT PROJECT AND ORIGINALLY PROPOSED WWSP PROJECT LAND USES

LAND USE COMPONENT	WWSP REDUCED DEVELOPMENT PROJECT	ORIGINAL WWSP
TOTAL ACRES	201	201
DWELLING UNITS	377	701
RESIDENTS	830	1660
RETAIL/OFFICE SPACE	50,000 square feet	100,000 square feet
PERMANENT JOBS	190	235
COUNTY/CIVIC OFFICES	Yes, 10+ acres	Yes, 10+ acres
ON-SITE WWTP	No	Yes
NEW ELEMENTARY SCHOOL	No	Yes
NEW FIRE STATION	Yes	Yes
OPEN SPACE*	~135+ acres will be re-allocated for open space and park uses.	53.7 acres
PARKS*		10 acres

*Note: The reduction in land uses will allow for additional acres of land to be devoted to providing more parks and open space, eliminating the on-site WWTP (9.7 acres), elementary school (8.8 acres), and low density residential development (41.1 acres), as well as accounting for less acreage for on-site roadways. As a result, approximately 60 acres of land would become available, which can be dedicated to providing more parks and open space.

Table 2-2 Comparison of Land Uses for Originally Proposed WWSP and Reduced Development Project (Rounded Up to Nearest 1/10)

LAND USE		ZONING	ACRES	RESIDENTIAL UNITS	% OF TOTAL ACRES	ACRES	RESIDENTIAL UNITS	% OF TOTAL ACRES
			ORIGINALLY PROPOSED WWSP			REDUCED DEVELOPMENT PROJECT		
LDR	Low Density Residential	PD-R1	41.1	280	20.4%	N/A	N/A	N/A
MDR	Medium Density Residential	PD-R2	27.6	220	13.7%	25	177	12.4%
HDR	High Density Residential	PD-R3	9.0	200	4.5%	9	200	4.5%
Residential Subtotal			*77.7*	*700*	*38.6*	*34*	*377*	*16.9%*
CC	Community Commercial	PD-CC	12.0	N/A	6.0%	6	N/A	3%
OS	Open Space	OS	53.7	N/A	26.7%	130	N/A	64.5%
PR	Parks and Recreation	PR	10.0	N/A	5%	5	N/A	2.5%
PQ/P	Electric Substation	PQ/P	1.0	N/A	.5%	1.0	N/A	.5%
	Sewer Lift Station		1.0	N/A	.5%	1.0		.5%
	Civic Space		13	N/A	6.5%	13		6.5%
	Fire Station		2.6	N/A	1.3%	2.6		1.3%
	Wastewater Treatment		9.2	N/A	4.5%	0		0
	Elementary School		8.8	N/A	4.4%	0		0
	Major Streets		12	N/A	6.0%	8.4		4.3%
Subtotal Commercial/ Public			*123.3*	*N/A*	*61.4%*		*N/A*	*7%*
TOTAL			**201**	**700**	**100%**	**201**	**377**	**100.0%**

2.4 USE OF THE EIR IN CEQA REVIEW OF LATER PROJECTS

As noted in DEIR Section 1.3, a specific plan provides expected uses and objectives, but future development proposals would be subject to CEQA compliance, compliance with WWSP and County policies, and subsequent environmental review if the development is outside of the scope of this EIR. If it is determined that a future proposal is consistent with the WWSP and impacts of the new project are within the scope of the certified EIR, further environmental review may not be necessary. Section 65457(a) of the California Government Code and §15182(a) and §15183 of the CEQA Guidelines encourage streamlining and provide, among other things, that an EIR or Negative Declaration (ND) is not required for any residential project undertaken in conformity with an adopted Specific Plan for which an EIR has been certified. Thus, proposals for land uses within the WWSP will be

reviewed, considering these streamlining provisions relying on information included in this EIR and the standards set forth in PRC §21166, to determine whether further environmental review is required.

3.0 COMMENTS

Twenty-four sets of comments were received by the County on the DEIR, including verbal comments presented during the August 2024 Planning Commission's public comment hearing as memorialized in the hearing's minutes. To support the response-to-comment process and to track that all comments have been addressed, these comments have been annotated with margin notations for each individual comment topic. The comments were received from the parties listed below. A complete copy of the comments and minutes from the Planning Commission Hearing are included in Appendix A.

Commenter 1. Amador County Airport

Commenter 2. Foothill Conservancy #1

Commenter 3. Commissioner Mark Bennett

Commenter 4. William May #1

Commenter 5. William May #2

Commenter 6. State Water Resources Control Board (SWRCB)

Commenter 7. Commissioner David Wardall #1

Commenter 8. California Department of Fish and Wildlife (CDFW)

Commenter 9. Department of California Highway Patrol (CHP)

Commenter 10. John Kirkpatrick

Commenter 11. Commissioner David Wardall #2

Commenter 12. April Barcenas

Commenter 13. Foothill Resource Management

Commenter 14. William May #3

Commenter 15. California Department of Transportation (Caltrans)

Commenter 16. Amador County Transportation Commission

Commenter 17. Lozano Smith Attorneys at Law on Behalf of the Amador County Unified School District (ACUSD)

Commenter 18. Amador Water Agency (AWA)

Commenter 19. City of Sutter Creek

Commenter 20. Foothill Conservancy #2

Commenter 21. Amador Local Agency Formation Commission (LAFCO)

Commenter 22. Jill North

Commenter 23. Commissioner David Wardall #3

Comment Letter 24. August 13, 2024, Planning Commission Hearing Minutes

Hearing Comments 1-4: William May

Hearing Comment 5: Cindy

Hearing Comments 6-13: John Kirkpatrick

Hearing Comments 14-16: Steve Cannon

Hearing Comments 17-21: Craig Baracco

Hearing Comments 22-26: Susan Peters

Hearing Comments 27-29: John Kirkpatrick

Hearing Comments 30-32: Commissioner Mark Bennett

4.0 RESPONSES TO COMMENTS

This section includes Master Responses that address topics that apply to numerous comments received on the DEIR and a matrix that identifies each commentor, comment letter/hearing minutes, comment number, comment summary, a reference to a Master Response or comment, and a response to each comment. The Master Responses, provided in Table 4-1 on the following pages, include updated information from recent inquiries by County Planning Department staff with public service-related providers and consolidate responses to similar comments as follows:

- Master Response 1 – Westover Field Airport/Airport Land Use Compatibility Plan (ALUCP) Compatibility
- Master Response 2 – Fire Protection Services
- Master Response 3 – Transportation Requirements
- Master Response 4 – Wastewater Service Requirements
- Master Response 5 – Surface Water Management

Each Master Response acknowledges updated information, includes a summary, and divides the responses into appropriate sub-sections. As noted previously, the history of the WWSP and the decision of the County to advance the Reduce Development Project apply to all responses to comments.

As described in DEIR Section 6.0 and FEIR Section 2.0, the CEQA environmental review for the WWSP was conducted at a programmatic level. CEQA establishes that Specific Plan impacts are to be addressed at a programmatic level and that future land uses may generate impacts internally within a Specific Plan area. As a result, future development proposals would be subject to refined project definition, County and CEQA review, and compliance with WWSP and County plans, policies, and standards, as well as other applicable local, State, and federal regulatory requirements for new development.

Like the originally proposed WWSP, the WWSP Reduced Development Project is planned to be built out over a 20- to 30-year period but is a smaller development concept that will: connect to existing potable and wastewater facilities to meet on-site demands; use on-site drainage features to meet surface water management demands; eliminate the on-site WWTP and elementary school; eliminate Low Density Residential (LDR) development; focus on providing market-rate and affordable housing; allow for flexibility to increase acreage for the preservation of natural and public open space resources; maintain rural character; and respond to changing demographics. The Reduced Development Project would be subject to the same regulations and standards as the originally proposed WWSP, but due to the reduction in land uses and service demands, impacts would be approximately 50% less.

4.1 MASTER RESPONSE 1 – WESTOVER FIELD AIRPORT/ALUCP COMPATIBILITY

There were several comments related to compatibility of the existing Westover Field Airport and implementation of the proposed WWSP. These comments focused on proximity of the airport to the WWSP new land uses, take-off and landings, documented safety and noise contours, and nighttime lighting and glare. This response provides a summary, followed by more detailed responses.

4.1.1 SUMMARY

The WWSP Reduced Development Alternative does not introduce any additional or change in impacts regarding the Westover Field Airport or the ALUCP. In early 2026, County Planning staff contacted airport personnel to confirm whether there were any changed circumstances from their August 2024 DEIR comment letter. The supplemental response from airport personnel mirrored the initial response on the DEIR as well as the NOP. Requirements regarding safety, light and glare, and airport noise are disclosed in the existing ALUCP which was considered with the responses supplied prior to preparation of the DEIR and incorporated in the proposed MMs for the originally proposed WWSP project.

The reduction in project scope associated with the Reduced Development Project may reflect diminished impacts in these areas, and therefore comments related to the Westover Field Airport have been adequately addressed and there are no necessary changes required. As described in DEIR Section 6.0 and FEIR Section 2.0, the CEQA environmental review for the WWSP was conducted at a programmatic level. As a result, future development proposals would be subject to refined project definition and CEQA analysis. The County acknowledges that any future development will be subject to compliance with the ALUCP and Safety Zone 6 and would consider avigation easements, designated safety overrun areas, and emergency landing provisions. Therefore, the WWSP and the Reduced Development Project are consistent with the current and draft update ALUCPs.

4.1.2 INTRODUCTION OF WWSP LAND USES

Included in DEIR Section 2.3, Figure 2-6 shows Westover Airport Safety Zone 6 and the Airport Influence Area and Figure 2-7 shows the Residential Avoidance Area. The originally proposed WWSP and the Reduced Development Project proposed residential development is outside of the Avoidance Area. DEIR Section 3.4 confirms that the proposed WWSP is consistent with Policy LU-13.2 and WWSP Design Standards and Guidelines that require development within close proximity to the Westover Field Airport adhere to height limits, ALUCP compliance, and comply with lighting restrictions to prevent interference with aircraft navigation. These measures ensure compatibility with airport operations, compliance with Federal Aviation Administration (FAA) requirements, and would not jeopardize FAA Grant Assurances to maintain federal funding for airport improvements.

DEIR Section 3.8 references that the northeast portion of the WWSP site is located in ALUCP Safety Zone 6. Based upon proximity to the Airport, configuration of the land uses, existing commercial buildings, most of the WWSP land uses are outside of Safety Zone 6 and the DEIR concluded that the proposed WWSP land uses are consistent with the ALUCP and that potential impacts are less than significant.

Additional discussions related to compatibility of the existing airport with proposed WWSP land uses are addressed in DEIR Sections 2.3, 3.2, 3.4, 4.9, 4.11, and 6.0. Existing County plans and policies provide guidance and direction for future development including County General Plan Goal LU-13 that requires future land uses in the vicinity of the airport to be conducive to the continued airport function and that approval of any development within the vicinity of Westover Field must be consistent with the ALUCP.

County Zoning Ordinance Chapter 19.77, Objects Affecting Navigable Airspace, specifically Section 19.77.050 recommends that any changes in the location and dimension of structures within the ALUCP comply with FAA Advisory Circular 70/7460-1 Obstruction Marking and Lighting. The DEIR evaluated potential impacts from implementation of the WWSP and determined that it is consistent with relevant Westover Field airport plans and policies.

4.1.3 TAKE-OFF AND LANDING

The DEIR concluded that the WWSP is consistent with relevant Westover Field Airport plans and policies and is compatible with air traffic to and from the airport. DEIR Section 4.9.7 identified that the ALUCP includes a critical study of airspace and guidance on future development in proximity to the airport. The Reduced Development Project will result in less overall development and increased open space that will allow greater distance from Westover Field air traffic patterns and WWSP land uses. The County acknowledges that future WWSP development proposals will be subject to ALUCP compliance, Safety Zone 6 requirements, and would consider emergency landing provisions.

4.1.4 SAFETY AND NOISE CONTOURS

DEIR Section 4.11.5, Impact 4.11-3, notes that a portion of the WWSP site lies within the Westover Field 55 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) noise contour, where residential development is "Normally Unacceptable" per the ALUCP. This section also addresses noise compatibility associated with proximity of WWSP land uses and exposure to aircraft noise and safety issues. Aircraft noise impacts are potentially significant, but would be reduced to less than significant, with implementation of MM NOI-2, which requires interior noise control measures such as improved sound transmission class (STC)-rated glazing. The WWSP Reduced Development Project removes housing located within the Westover Airfield 55 dBA noise contour, thus eliminating this impact entirely. All development would comply with WWSP Design Guidelines and ALUCP requirements. As described in DEIR Section 6.0 and FEIR Section 2.0, the CEQA environmental review for the WWSP was conducted at a programmatic level. As a result, future development proposals would be subject to refined project definition and CEQA analysis. The Reduced Development Project would remove residential land uses from within the 55 dBA airport noise contour and reduce development intensity, thus minimizing potential conflicts with airport operations.

4.1.5 NIGHTTIME LIGHTING AND GLARE

DEIR Sections 4.1.3–4.1.5 identify that the proposed WWSP would introduce substantial project specific and cumulative nighttime lighting and glare from building interiors, exterior fixtures, and reflective surfaces, dramatically altering the existing environment. These impacts are considered significant and unavoidable, with no feasible MMs to reduce them to less than significant levels. Nighttime lighting is addressed in several sections of the WSSP, including Appendix A Development Standards; Appendix B Design Guidelines; Policy 7.7 that covers lighting within new parks; Section 8.5.A that requires street lighting to comply with County standards; and Section C.1 Project Features that limits lighting in residential subdivision entries and landscaped parkways. Because the site is currently vacant, new lighting would still be visible, even with a reduced WWSP, and therefore, impacts remain significant and unavoidable.

DEIR Section 3.8 identifies potential nighttime lighting and glare impacts to pilots landing at the Westover Field Airport and that the northeast portion of the WWSP site is located in Safety Zone 6 of the ALUCP. The DEIR concluded that proposed land uses are consistent with the ALUCP and that impacts are less than significant.

4.2 MASTER RESPONSE 2 – FIRE PROTECTION SERVICES

There were several fire protection services comments related to implementation of the WWSP. Comments were focused on adequacy of fire protection services; response times; secondary, emergency and evacuation access; increased wildfire risk and vegetation clearance. This response includes a summary, followed by more detailed responses.

4.2.1 SUMMARY

In early 2026, County Planning staff contacted Amador Fire Protection District (AFPD) personnel to confirm whether there were any changed circumstances from the DEIR. The AFPD provided a supplemental response focused on the WWSP Reduced Project regarding the adequacy of existing resources to meet the adjusted demands. The AFPD responded that given the lowered scale of development (reduced to 377 from 700 residential units and reduced public and commercial uses), a new fire station would still be necessary to provide adequate emergency service levels and response times as existing stations in Jackson and Sutter Creek are unable to absorb the additional demand of the Reduced Project without impacting service reliability.

4.2.2 RESPONSE TIMES

DEIR Section 4.13.3 describes that AFPD provides fire protection for the WWSP site under an automatic aid agreement with the City of Jackson Fire Department and mutual aid agreements with the California Department of Forestry and Fire Protection (CAL FIRE) and other agencies. Currently, the closest fire station to the WWSP site is located in the City of Jackson, Station 131, approximately 1.25 miles away, and ongoing coordination with local agencies would ensure adequate emergency response. DEIR Section 6.6.4 describes that the Reduced Development Project, with reduced population, development, and service demands, includes an on-site fire station to supplement AFPD services, requires compliance with fire-safe development standards and cooperative agreements, and complies with California Building Code (CBC) and California Fire Code (CFC) policies and standards so that fire risk and emergency response would be incrementally less than the originally proposed WWSP and therefore, impacts remain less than significant.

4.2.3 SECONDARY AND EMERGENCY EVACUATION

DEIR Section 4.14, Impact 4.14-4, identifies that construction compliance plans will require maintenance of emergency access during construction. DEIR Section 4.17.1 and County Code Chapter 15.30 require emergency access, fire-safe design, evacuation routes, and compliance with CBC and CFC requirements that all plans be reviewed by AFPD. Operationally, the circulation network will comply with County Municipal Code requirements for safe emergency access and evacuation routes.

DEIR Section 4.17.1 identifies that the WWSP site connects to primary County evacuation routes on State Route (SR) 88 and SR-49 assessed via Wicklow Way and Stoney Creek Road. AFPD stated that a secondary ingress/egress connection to either Stoney Creek Road or West View Drive is being planned to provide adequate emergency access and alternative evacuation routes to the WWSP site and improve public safety standards consistent with current and emerging State standards.

Section 4.9-6 notes that construction activities could cause temporary lane closures, but plans must identify alternative routes or maintain access to avoid cumulative evacuation impacts. The Reduced Development Project would reduce the number of structures and people exposed to wildfire risk; result in incrementally less impacts; and require compliance with the same MMs, regulations and standards as the originally proposed WWSP, and result in reduced wildfire risk.

4.2.4 INCREASED WILDFIRE RISK AND VEGETATION CLEARANCE

DEIR Section 4.17.2 identifies the WWSP site as a High Fire Hazard Severity Zone and acknowledges wildfire risk as significant prior to mitigation. MM WILD-1 and MM WILD-2, along with compliance with fire-safe building codes and defensible space requirements, reduce impacts to less than significant. Insurance availability is not addressed in the DEIR, as it is not a CEQA requirement. This section also documents wildfire history near the site,

including fires in 1961 and 2005. The Butte Fire of 2015 is not mentioned; however, there are numerous references to wildfires and fire protection services throughout the DEIR and the WWSP. DEIR Section 4.17.3 and WWSP Policy 9.8 identify the requirement for fuel modification zones and vegetation management adjacent to open space areas to create defensible space. County Code also requires fire-safe vegetation setbacks. The WWSP and Appendices A and B also include information and guidance related to perimeter fencing and the transition from suburban to open space uses.

4.3 MASTER RESPONSE 3 – TRANSPORTATION REQUIREMENTS

There were numerous comments made on the DEIR related to traffic and transportation from implementation of the WWSP. Comments were focused on WWSP internal circulation, transportation-related policy consistency, metrics for evaluating traffic impacts under the CEQA, multi-modal transportation and public transit services, and coordination with Caltrans.

In early 2026, County Planning staff contacted Amador County Transportation Commission (ACTC) personnel to confirm whether there were any changed circumstances from the DEIR. ACTC's response to the Planning staff inquiry confirmed that the DEIR evaluation of transportation impacts of the originally proposed WWSP apply to the Reduced Development Project and that existing resources are adequate to meet these lower demands. As noted in DEIR Section 6.6.4 the Reduced Development Project would be subject to the same regulations and standards as the proposed WWSP guiding site access and safety, but the reduced size would result in lower transportation impacts. In addition, County Public Works Department and Caltrans' comments regarding potential impacts to county roads and State Highways also remain the same. This response includes a summary, followed by more detailed responses.

4.3.1 WWSP INTERNAL CIRCULATION

DEIR Sections 2.2–2.3 identify that WWSP site access and boundaries include Wicklow Way abutting the northwest and providing the main entrance from SR-88, with Stoney Creek Road running along the southeastern site boundary. WWSP Community Form Elements and Impact 3.0-1 identify that the circulation system would provide internal connections and a primary north-south link to surrounding communities. Further, DEIR Section 4.14.4, Impact 4.14-1, identifies that the originally proposed WWSP included a circulation system with arterial and collector roadways, sidewalks to support non-vehicular travel including a system of pedestrian and bike paths to enhance connectivity. Off-street Class I and Class IA bike paths would be provided in landscaped corridors and open-space areas, and on-street Class II bike lanes would be provided on public streets. Thus, implementation of the WWSP would not conflict with the *Amador Countywide Pedestrian and Bicycle Plan*.

DEIR Section 6.0 indicates that the development footprint shifts northward with reduced proportional infrastructure to accommodate the Reduced Development Project which would be scaled to meet lower traffic demands. Wicklow Way would extend through the site to Stoney Creek Road in part to accommodate traffic from Argonaut High School (or its ACUSD consolidation counterpart), which is not part of the WWSP Project.

4.3.2 TRANSPORTATION-RELATED POLICY CONSISTENCY

DEIR Section 4.14.2 and Regional Transportation Plan (RTP) Policy 2F identify that new development must pay the Regional Traffic Mitigation Fee (RTMF) if it contributes impacts to Tier I improvements. DEIR Section 4.14.4 confirms that individual developer proposals will require circulation plans for review to ensure compliance with County demonstrating compliance with County roadway and safety standards. WWSP Sections 6.2, 10.0, and Appendices A and B include policies, standards, and guidelines for future circulation systems within the WWSP.

DEIR Section 4.14, Impact 4.14-4, identifies that construction management plans will maintain emergency access during construction, and operational circulation will comply with County Municipal Code requirements for emergency access and evacuation. The AFPD and County Public Works Department would also review design plans to ensure compliance with emergency access and traffic safety requirements and standards, and therefore, no impact would occur.

4.3.3 CEQA METRICS FOR EVALUATING TRAFFIC IMPACTS

DEIR Section 4.14.7 explains that the County considers Level of Service (LOS) as a useful tool for explaining local traffic and circulation planning from a policy consistency perspective even though CEQA uses vehicle miles traveled (VMT) as the primary metric. The County uses both LOS and VMT metrics to describe impacts. The County uses VMT analysis for CEQA purposes as required by Senate Bill (SB) 743, while recognizing that VMT does not effectively reflect transportation in rural areas in many respects. New projects increase VMT due to the low-density populations and dispersal of destinations reflected in rural areas and the application of typical mitigation for lowering vehicle trips such as public transit, alternative transportation, and walkability, being inherently infeasible.

DEIR Section 4.14.7 and Appendix F identify that a LOS analysis was performed for five intersections, including Wicklow Way/SR-88 and the Walmart entrance. The analysis confirmed that the Wicklow Way/SR-88 intersection would operate at LOS F without improvements. This analysis did not include Hoffman Street/SR-49 or Argonaut Lane/SR-49. Future Conditions of approval will require fair-share contribution for signal installation at the Wicklow Way/SR-88 intersection to meet LOS standards to improve safety prior to construction and the first phase of development. The Walmart entrance signal is also recommended under cumulative traffic conditions and will be monitored for timing to address future increased congestion. Section 4.14.7 explains that cumulative traffic conditions were evaluated using baseline growth assumptions and the Amador County Travel Demand Model. VMT analysis was conducted using the VMT+ tool and concluded that no impact would occur. This analysis evaluated intersection capacity and delay however, it does not reference Synchro or SimTraffic or the applicability of this metric to address traffic in rural areas.

4.3.4 MULTI-MODAL TRANSPORTATION

DEIR Section 4.13.3 identifies that the WWSP includes a bikeway and pedestrian network to improve connectivity for residents. DEIR Section 4.14.3, Impact 4.14-1, identifies that the circulation system would extend Wicklow Way to Stoney Creek Road and provide a hierarchy of arterial and collector roadways designed to connect residential areas to parks, civic and commercial amenities, open space, and the adjacent school site. DEIR Section 4.14.4 and WWSP Policy 6.1 indicate that the circulation system will support all modes of travel, multimodal connectivity, Americans with Disabilities Act (ADA)-compliant access, non-vehicular options through incorporation of sidewalks, trails, public transit, bike lanes and bikeway connectivity between neighborhoods and destination points as part of project design. DEIR Section 6.6.4 and FEIR Section 2.0 identify that the Reduced Development Project would be subject to the same regulations and standards as the originally proposed WWSP guiding site access and safety, but the reduced size would result in lower impacts. As development occurs, coordination with public service providers to determine specific needs including expanded public transit service, schedules, and new stops. The DEIR demonstrates that these improvements, combined with existing Amador Transit Service (Route 5), would enhance safe access and connectivity for school-aged students and that implementation of the WWSP would not conflict with applicable transit-related policies.

4.3.5 CALTRANS COORDINATION

DEIR Section 2.6 identifies that a Caltrans Encroachment Permit is required if construction activities encroach into a State roadway right-of-way (ROW). The Encroachment Permit application requires CEQA documentation, technical studies, and evidence of tribal consultation prior to permit issuance and site development. Future WWSP development proposals will require discretionary approvals and review by responsible agencies, including Caltrans, for compliance with applicable standards which include the use of updated traffic models. These approvals include design review of subdivision maps, engineering improvement plans, and encroachment permits, ensuring coordination on project specific and cumulative impacts.

4.4 MASTER RESPONSE 4 – WASTEWATER SERVICE REQUIREMENTS

Numerous DEIR comments were submitted related to wastewater demands from implementation of the WWSP. Comments were focused on service provider options for new land uses, capacity of existing purveyors to meet increased demands, and impacts associated with the on-site Wastewater Treatment Plan (WWTP). This response includes a background discussion of wastewater conveyance including identification of related DEIR sections, the Reduced Development Project, and the need for ongoing coordination with purveyors. In addition, this section incorporates updates received in early 2026 when County Planning staff contacted AWA and City of Sutter Creek personnel to confirm whether existing wastewater conveyance and processing infrastructure could accommodate the reduced residential, commercial, and civic demands of the Reduced Development and whether there were any changed circumstances from the DEIR. While AWA initially cited potential economic challenges associated with construction of a new on-site WWTP, lower demands from the Reduced Development Project eliminate the need for an on-site WWTP and can be accommodated within existing system planned treatment expansion and production. Thus, based upon coordination with these purveyors, it was determined that that it is feasible to use the City of Sutter Creek's planned improvement/expansion for the new demand. Therefore, existing resources are adequate to meet the lower demands and water quality requirements for the Reduced Development Project and impacts are less than significant.

4.4.1 BACKGROUND ON WASTEWATER CONVEYANCE AND PROCESSING

WWSP (specific plan) Sections 1.1, 2.5, and 4.16 identify that the AWA owns and operates wastewater collection systems in the WWSP area and would operate the originally proposed on-site WWTP. DEIR Impact 4.16-1 and Section 2.5 indicate that water and wastewater infrastructure improvements would be constructed using a phased approach based on AWA standards. Phasing of infrastructure improvements and funding obligations would be detailed in future Development Agreements, subject to the assessment of Development Fees, for each individual development proposal. Further, developers would be required to demonstrate availability of water supply, water treatment capacity, and wastewater treatment prior to discretionary approvals and pay their fair share improvement fees per MM 4.13-1a.

DEIR Section 4.16 identified that the originally proposed WWSP included an on-site WWTP because off-site treatment at the City of Sutter Creek's WWTP was at capacity and determined infeasible to accommodate full build-out of the WWSP. This section also identified a 9.7-acre site for an on-site WWTP and public infrastructure, utilities and services to support full build-out of the WWSP. Figure 4.10-3 shows the location of a proposed wastewater lift station in the northwestern portion of the site to support internal conveyance gravity and force mains, including approximately 10,920 linear feet of gravity sewer and 2,250 linear feet of force mains. The DEIR also noted that Martell wastewater is currently treated at the City of Sutter Creek WWTP under contract with AWA and off-site improvements may include increased conveyance and processing availability to accommodate future WWSP development. The DEIR also identified the WWTP as an odor source and that MM AQ-4 required

odor control technologies (e.g., carbon filters, biofilters, scrubbers, and enclosures) and operational monitoring to prevent odor complaints. As part of the DEIR process, Alternative #2 (Hybrid WWTP) was identified as an option for reducing on-site treatment and conveying wastewater to the Sutter Creek WWTP with required upgrades, improvements, and modernization, however, this alternative was found to have greater impacts and is no longer being considered.

The DEIR initially assumed a lift station in the southwest portion of the WWSP site along with the on-site WWTP for the Reduced Development Alternative #4; however, the Reduced Development Project being advanced by the County removes the WWTP and the need for sewer infrastructure, therefore, specific impacts from operation of an on-site WWTP no longer exist (i.e., construction and operational impacts including odor, and higher Development Fees). Thus, initial capacity concerns for using existing WWTP facilities to accommodate the Reduced Development Project demands are resolved by having the City of Sutter Creek accept wastewater subject to upgrades paid by future developers.

4.4.2 NEED FOR ONGOING COORDINATION WITH PURVEYORS

Ongoing coordination with the City of Sutter Creek and AWA is fundamental in determining the financial and logistical details of using Sutter Creek's improved/expanded WWTP. Use of future expanded Sutter Creek facilities would be contingent upon the assessment of Development Impact Fees and Development Agreements for future developers to use the local wastewater collection system. Expanded capacity will require pump upgrades and a lift station to allow effluent transport to the existing WWTP, as well as capital improvements to expand service beyond current capacity, which AWA currently has reserved for future developments, including accommodating the Reduced Development Project. The nature of these required development impact fees and agreements would be contingent upon the developer, phase, element, and timing. Thus, for the Reduced Development Project, MMs and conditions of approval would adequately account for the fulfilment of these requirements.

4.5 MASTER RESPONSE 5 – SURFACE WATER MANAGEMENT

Numerous DEIR comments were submitted related to surface water conveyance from implementation of the WWSP. Comments were focused on the adequacy of proposed drainage features to handle peak run-off and flooding impacts. This response incorporates updates received in early 2026 from County Planning staff contact with AWA and the City of Sutter Creek personnel to confirm changed circumstances from the DEIR. The response to this contact identified that the DEIR evaluation and on-site drainage and water quality plans resulted in less than significant impacts are adequate to accommodate the Reduced Development Project.

4.5.1 BACKGROUND

For the originally proposed WWSP, AWA acknowledged that an area-wide drainage improvement plan could direct surface water into an on-site WWTP and that using an off-site WWTP is likely infeasible since it would require an on-site water recycling strategy for seasonal storage of treated effluent and an accompanying drinking water system. The removal of the on-site WWTP for the Reduced Development Project makes accompanying supportive systems infeasible, further simplifying the project. AWA confirmed that allowing on-site surface water conveyance and off-site wastewater treatment for the Reduced Development Project would result in less than significant impacts. The same regulatory requirements, Best Management Practices (BMPs), and low impact design (LID) features would apply to the Reduced Development Project (resultant reduction in land uses by approximately 50%) resulting in less ground disturbance and impervious surfaces, run-off, siltation, erosion, and pollutant loading, therefore, hydrology impacts would be less than the proposed WWSP. This response includes a background discussion of WWSP surface water conveyance, including identification of existing information

contained in DEIR sections, identified decreased impacts from implementation of the Reduced Development Project, and the need for ongoing regional drainage coordination.

DEIR Surface water conveyance, management, and water quality are described in the DEIR and include a combination of surface and subsurface culverts and bridges (including Stoney Creek and at trail crossings of creeks, drainages, tributaries) to convey 100-year storm flows throughout the WWSP area.

4.5.2 SURFACE WATER CONVEYANCE

DEIR Sections 4.4, 4.10, 4.13, and 4.16 establish the elements of WWSP surface water conveyance and management, as follows:

- Storm water will be routed through vegetated swales utilizing BMPs before discharge to open-space corridors. BMPs would control water quality and flooding impacts, reduce peak runoff, chemical use, and pollutant loading to near pre-project levels and thus, impacts would be less than significant.
- Channelization or alteration of Stoney Creek is not proposed and the internal roadway system, including a bridge over Stoney Creek, would be designed to accommodate project-related traffic and minimize environmental impacts.
- DEIR Section 4.4, Figure 4.4-2, shows an unnamed stream that runs through LDR area within designated open space.
- The Reduced Development Project does not include an on-site WWTP, therefore, potential impacts, regulatory requirements and MMs from this element would not occur.
- The WWSP site is outside any mapped groundwater basin; therefore, BMPs, LID features and undeveloped open space corridors will enhance groundwater recharge.
- Construction water use will come from AWA (primarily surface water), and long-term potable water will be supplied by AWA with recycled water offsetting demand. As described in Impact 4.13-6, construction-related water quality impacts would be minimized through implementation of a Storm Water Pollution Prevention Plan (SWPPP).
- DEIR Section 4.10.4, Impact 4.10-1, and Figure 4.10-3, show two detention basins, with capacities of 194 AF and 71 AF, located within the northerly drainage area, sized for a 100-year, 24-hour storm event to reduce peak runoff by ~78.55 cubic foot per second (cfs) without flooding on- or off-site and maintain pre-development runoff rates. A detention basin is not identified in the southwest corner of the WWSP site because preliminary surface flow calculations showed that the two basins could handle runoff for the entire site. With these basins and implementation of BMPs and LID features, flooding impacts were determined to be less than significant (Impact 4.10-3). DEIR Section 4.10 and WWSP Policies C-4.1 and C-5.2 emphasize that incorporation of these strategies into future development proposal designs would reduce impacts to less than significant levels.
- WWSP Section 10.0 provides implementation and funding guidance for improvements and identifies CSA #4, annexation, and funding mechanisms to aid in implementation of drainage improvements.
- State Ground Water Management Act (SGMA) policies do not apply to the Reduced Development Project because use of the on-site groundwater well is not needed to for the lower water demands of the Reduced Development Project and therefore, groundwater impacts are less than significant.
- The AWA 2020 Urban Water Management Plan (UWMP) was prepared in accordance with the State's UWMP Act and includes a 20-year water supply reliability analysis, demand management measures,

recycled water planning, and confirms sufficient water supplies for normal, dry, and multiple dry years through 2045. This Plan projects that AWA can meet customer demands, including the Reduced Development Project. The County will make the UWMP publicly available, as required by CEQA, for DEIR reference documents.

TABLE 4-1 MASTER RESPONSES TO COMMENTS

LETTER #	COMMENTER	LETTER DATE	COMMENT #	CEQA RESOURCE TOPIC AREA	COMMENT TOPIC	COMMENT DETAILS	RESPONSES
1	Amador County Airport	2/7/2023	1-1	Hazards & Hazardous Materials	Airport Safety	The project lies under the instrument approach and traffic pattern for Amador County Airport, with aircraft flying as low as 500–1,000 feet above ground level. Low elevations during emergencies could pose safety risks to residents, tenants, and customers in the development.	Refer to Master Response 1 – Westover Field Airport Compatibility.
1	Amador County Airport	2/7/2023	1-2	Land Use & Planning	Airport Compatibility	The County must comply with Federal Aviation Administration (FAA) Grant Assurances (Nos. 20 and 21) to maintain federal funding for airport improvements. Any incompatibility in land use or failure to mitigate hazards could jeopardize future funding.	Refer to Master Response 1 – Westover Field Airport Compatibility.
1	Amador County Airport	2/7/2023	1-3	Aesthetics	Airport Safety/ Lighting & Glare	DEIR Section 3.1, MM 3.1-3a: References that “Dark Sky” approved lighting for streets and security may cause confusion with airport lighting. Improper lighting could mislead pilots during approach, creating potential safety hazards.	Refer to Master Response 1 – Westover Field Airport Compatibility.
1	Amador County Airport	2/7/2023	1-4	Aesthetics	Airport Safety/ Lighting & Glare	DEIR Section 3.1, MM 3.1-3b: Both commercial and residential development can produce glare from construction materials, such as metal siding, solar panels, and pools. Glare in pilots’ eyes is a recognized hazard under FAA Part 77 guidelines and should be mitigated.	Refer to Master Response 1 – Westover Field Airport Compatibility.
1	Amador County Airport	2/7/2023	1-5	Noise	Aircraft Noise & Easements	Impact #3.8-2 MM: The proposed noise easement does not fully address concerns about air navigation safety. An air navigation easement is recommended to protect flight paths and prevent hazards like misleading lights or structures.	Refer to Master Response 1 – Westover Field Airport Compatibility.
1	Amador County Airport	2/7/2023	1-6	Noise	Aircraft Noise & Easements	Structures within the development must meet interior noise standards due to proximity to runway departure paths. Noise contour studies should guide compliance.	Refer to Master Response 1 – Westover Field Airport Compatibility.
1	Amador County Airport	2/7/2023	1-7	Land Use & Planning	Airport Compatibility	The proposed school site may require review by the State Office of Education and Caltrans Division of Aeronautics for compatibility with airport operations.	Refer to Master Response 1 – Westover Field Airport Compatibility. The DEIR identifies that the originally proposed WWSP included a new school site and acknowledged review by the State Office of Education and Caltrans Division of Aeronautics for airport compatibility. WWSP land uses and future development are subject to WWSP Design Guidelines and compliance with the ALUCP that requires avoidance of interference with airport operations. The County is advancing the WWSP Reduced Development Project for recommended decision-maker approval and the new elementary school has been removed, thus reducing the need for these two outside agencies’ new school facility review.
2	Foothill Conservancy	2/27/2023	2-1	Utilities & Service Systems	Wastewater Treatment	Confirm feasibility of expanding Sutter Creek WWTP to meet project’s needs. Coordination with Amador Regional Sanitation Authority (ARSA) is recommended to avoid strain on existing systems and free up land for other uses.	Refer to Master Response 4 – Wastewater Service Requirements.

LETTER #	COMMENTER	LETTER DATE	COMMENT #	CEQA RESOURCE TOPIC AREA	COMMENT TOPIC	COMMENT DETAILS	RESPONSES
2	Foothill Conservancy	2/27/2023	2-2	Land Use & Planning	Civic Center	Provide a complete explanation of the civic center's purpose and identify any offices that may be relocated. This detail is needed to evaluate impacts and alternatives.	DEIR Section 2.0 Figure 2-7 identifies a proposed 10-acre site for County administrative offices/civic center within the P/QP land use designation and Section 4.12.1 identifies that this site is intended to consolidate civic functions and provide community service uses. The definition of the uses included within this designation is as follows: "*The PQ/P designation provides community serving uses such as civic, education, public services, and utilities. One 12.4-acre parcel is planned at the northeast portion of the site. Located near the intersection of SR-88 and Wicklow Way, this site is suitable for County offices or other needed civic uses. Pedestrians and bicyclists from the WWSP area can access the P/QP site via Wicklow Way and sidewalk and the street system throughout the WWSP area. An 8.8-acre elementary school site is planned, as well as a three-acre fire station site. Other PQ/P sites provide land for municipal services such as wastewater plant, sewer pump station, storm water detention, and other needs. Throughout the Specific Plan document, there are numerous references and guidance related to the County's expectations for this center."* The County is now advancing the WWSP Reduced Development Project, which no longer includes an on-site WWTP and the elementary school; therefore, impacts from these elements would not occur.
2	Foothill Conservancy	2/27/2023	2-3	Land Use & Planning	Open Space	Place conservation easements on designated open spaces to prevent future conversion. Include hiking and walking trails to maintain recreational value.	FEIR Section 2.0 includes a refined description of the WWSP Reduced Development Alternative #4, which the DEIR determined to be the environmentally preferred alternative. The County is now advancing the Reduced Development Project for recommended decision-maker approval, which eliminates land uses from the originally proposed WWSP, thus allowing for inclusion of more open space and habitat preservation. Subsequent environmental review will disclose details regarding conservation easements and refined mitigation requirements to preserve these uses in perpetuity. Future County conditions of approval and compliance with State and federal natural resource protection regulations would also define and enforce easement and mitigation requirements.
2	Foothill Conservancy	2/27/2023	2-4	Land Use & Planning	Housing Mix	Prioritize very-low, low, and moderate-income housing consistent with the Housing Element and Senate Bill (SB) 2. Identify deed restrictions or other measures to ensure long-term affordability.	DEIR Section 2.5 identifies that the originally proposed WWSP included purchase and rental housing affordable to middle-, low-, and very-low-income households, with 10% of units designated as affordable. FEIR Section 2.0 includes a refined description of the WWSP Reduced Development Project which eliminates the LDR development in order to prioritize medium and high density residential (MDR and HDR) developments to provide more affordable housing consistent with the County's Housing Element, SB 2 programs and RHNA commitments. Subsequent environmental review will disclose the amount and types of future housing and include deed restrictions or other measures to ensure long-term affordability. Future County conditions of approval are also expected to define and enforce affordability requirements.
2	Foothill Conservancy	2/27/2023	2-5	Public Services	Schools	Describe consistency with the ACUSD's school consolidation plan. Clarify how the proposed site aligns with district requirements.	DEIR Section 4.13, Impact 4.13-1 identifies that payment of SB 50 school impact fees is considered full mitigation under the CEQA. The DEIR identifies future WWSP development would be subject to County and CEQA review, compliance with SB 50, and other applicable policies; therefore, school-related impacts remain less than significant. The WWSP Reduced Development Project eliminates a new on-site elementary school; thus, impacts and regulatory compliance associated with a new school no longer exist.
2	Foothill Conservancy	2/27/2023	2-6	Hydrology & Water Quality	Storm Water Management	Provide details on how new storm water will be routed, drained, and infiltrated. Ensure measures prevent flooding and protect the creek.	Refer to Master Response 5 – Surface Water Management.
2	Foothill Conservancy	2/27/2023	2-7	Transportation	Pedestrian and Bicycle Access	Expand plans beyond vehicle routes to include sidewalks and bike trails. Ensure connectivity for residential and commercial areas.	DEIR Section 4.9 notes that the Sutter Street Extension is an active cleanup site under the voluntary cleanup program, with a draft remedial action workplan (RAW) prepared for road construction; however, this site is not a part of the WWSP.

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2	Foothill Conservancy	2/27/2023	2-8	Agriculture & Forestry Resources	Agricultural Protection	Preserve agricultural uses by maintaining easements and preventing incompatible fencing or barriers. Explain how open space will support these protections.	DEIR Section 4.2 identifies the existing cattle grazing and passage lease and the intent to maintain cattle transfer from private grazing lands located north and south of the WWSP eastern boundary to a specified cattle passage along the eastern and southern boundaries of the WWSP site. The WWSP identifies that whenever there is a transition from a residential or commercial use to open space or agricultural land, landscaped buffers shall be incorporated into project design. The County's decision to advance the WWSP Reduced Development Project will result in less overall development and increased opportunities for open space. This reduction in developed land uses will allow future development proposals to consider the specific location and area for the grazing lease to ensure compatibility.
2	Foothill Conservancy	2/27/2023	2-9	Land Use & Planning	WWSP Land Uses	Clarify phasing of infrastructure improvements and funding sources. A public financing plan should demonstrate sufficient and timely resources for sewer, water, and emergency services.	DEIR Section 2.0 identifies that build-out of the WWSP will occur over the next 20 years. Section 2.5 identifies that phasing of infrastructure improvements and funding obligations will be detailed in future Development Agreements and assessment of Development Impact Fees would address pro-rata costs of wastewater, drainage, and other public services. DEIR Section 4.13 explains that park funding is through Development Impact Fees and other sources and transportation improvements would be funded by project developers per Regional Transportation Plan (RTP) requirements (Impact 3.0-2). WWSP Section 10.0 describes WWSP implementation and Section 10.5 identifies potential funding sources. In addition, the Reduced Development Project, currently being advanced by the Planning Department, no longer includes an on-site WWTP. See Master Response 4 – Wastewater Service Requirements and Response to Comment 12-4.
2	Foothill Conservancy	2/27/2023	2-10	Land Use & Planning	Alternatives	Foothill Conservancy proposes an alternative with clustered housing, mixed-use areas, and preserved open space. This option could reduce impacts and maintain community character.	The DEIR WWSP Reduced Development Alternative #4 considered elements of a similar plan presented by the Foothill Conservancy in February 2023. FEIR Section 2.0 includes a refined description of the WWSP Reduced Development Project. As described in DEIR Section 6.0 and FEIR Section 2.0, the CEQA review for the WWSP was conducted at a programmatic level. As a result, future development proposals would be subject to refined project definition and further CEQA analysis, which will allow for additional public involvement opportunities. At full build-out, the WWSP Reduced Development Project would provide approximately 377 new residential units, adding 830 residents, which meets the County's RHNA commitment. FEIR Table 2-1 compares land use details of the Reduced Development Project and the originally proposed WWSP. The Reduced Development Project will eliminate LDR development, the on-site WWTP, and elementary school, which will result in opportunities to dedicate more acreage for natural resource and open space preservation and to maintain rural character and allow for a greater transition from suburban development and the existing oak woodlands and grasslands.

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2	Foothill Conservancy	2/27/2023	2-11	Cumulative Impacts	Cumulative Impacts	The Specific Plan may cause impacts on transportation, air quality, greenhouse gas (GHG) emissions, noise, and biological resources. Additional analysis and MMs are needed to address these concerns.	DEIR Sections 4.3.5, 4.8.3, 4.4.6, 4.11, and 4.14 concluded that implementation of the WWSP would result in cumulative impacts across multiple CEQA resource areas. Air quality and GHG emissions remain significant and unavoidable even with application of MM AQ-1 through MM AQ-3, MM GHG-1, and GHG-2 because WWSP emissions are not accounted for in the State Implementation Plan (SIP) and exceed SB 32/Scoping Plan goals. Biological resources impacts are identified as cumulatively significant due to regional development (Impact 4.4-6). DEIR Sections 4.11 and 4.14 note that noise and transportation cumulative impacts are less than significant and application of MM NOI-1 and MM NOI-2 would address localized construction and aircraft noise, and WWSP Design Guidelines also include recommended noise attenuation strategies for new development. Impacts from cumulative vehicle miles traveled (VMT) would be less than significant (Impact 4.14-4). As discussed in DEIR Section 6.0 and FEIR Section 2.0, the WWSP Reduced Development Project proportionally reduces cumulative impacts for air quality, GHG, biological resources, and traffic/noise due to lower development intensity and elimination of the on-site WWTP, elementary school, and LDR development. However, regional nonattainment for air emissions and the need for GHG reduction target impacts from biological resource fragmentation would still exist; therefore, cumulative impacts remain significant and unavoidable, although less severe than the originally proposed WWSP. The County acknowledges that future development will be subject to compliance with subsequent County and CEQA review and environmental protection policies in effect at the time of proposal to ensure that review requirements are met. See Response to Comment 15-9.
2	Foothill Conservancy	2/27/2023	2-12	Land Use & Planning	Land Use	General Policy LU-1.3, explains how WWSP will implement policies related to agricultural protection, environmental impact minimization, and pedestrian/bicycle transportation. Reference: Policy LU-1.3.	Refer to Master Response 5 – Surface Water Management and Response to Comment 20-1.
2	Foothill Conservancy	2/27/2023	2-13	Utilities & Service Systems	Infrastructure & Services	Show how adequate water, wastewater, and emergency services will be ensured before development occurs, including phasing details. Reference: Policies LU-2.2, LU-4.1, LU-4.4, LU-4.5, C-1.2, C-3.1, and LU-12.1.	Refer to Master Response 4 – Wastewater Service Requirements. Phasing of infrastructure improvements and funding obligations will be detailed in future Development Agreements prepared when specific development is proposed. Developers must demonstrate availability of water supply, water treatment capacity, and wastewater treatment prior to discretionary approvals and pay fair share fees for improvements per MM 4.13-1a. The DEIR also notes that public services, including a fire station, emergency response, and solid waste services, are included in the WWSP. The WWSP Reduced Development Project would reduce residential and associated land uses by approximately 50%.
2	Foothill Conservancy	2/27/2023	2-14	Transportation	Circulation	Clarify how Level of Service (LOS) standards will be applied and coordinated with Caltrans and describe measures to address congestion. Reference: Policies CM-1.1, CM-1.2, CM-2.2.	Refer to Master Response 3 – Transportation Requirements.
2	Foothill Conservancy	2/27/2023	2-15	Land Use & Planning	Housing	Identify strategies for housing diversity, affordability, and special needs populations, including very-low, low, and moderate-income housing consistent with General Plan Policies H-1.1, H-1.3, H-1.5, H-3.3, H-1.4, H-4.2, H-4.4, H-4.8.	DEIR Section 2.5 and Table 3-1 identify that a key objective of the WWSP is to meet RHNA commitments by providing housing units of varying housing densities, including rental and affordable units, with 10% designated for middle-, low-, and very-low-income households. See Response to Comment 2-4.
2	Foothill Conservancy	2/27/2023	2-16	Agriculture & Forestry Resources	Agriculture	Demonstrate compatibility of future land uses with adjacent agricultural areas and maintain agricultural buffers. Reference: Policies E-8.1, S-5.3.	See Responses to Comments 2-8 and 10-2.

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2	Foothill Conservancy	2/27/2023	2-17	Utilities & Service Systems	Water Conservation	Provide details on water conservation measures such as recycled water use and low-water landscaping. Reference: Policy C-4.1.	DEIR Section 2.5 describes that the WWSP includes water conservation measures such as minimizing the amount of turf in residential areas and parks and adding smart irrigation controllers and recirculating hot water systems. These measures are consistent with General Plan Policy C-4.1, which encourages water-conserving fixtures and low-water demand landscaping. In addition, the WWSP includes policies, guidelines, and standards for resource conservation measures. DEIR Section 6.4 describes that the WWSP Reduced Development Project would reduce associated land uses and demand for services systems and utilities by approximately 50%.
2	Foothill Conservancy	2/27/2023	2-18	Hydrology & Water Quality	Storm Water Runoff	Show how low impact design (LID) strategies and site design will reduce runoff and protect Rock Creek. Reference: Policies C-4.1, C-5.2.	Refer to Master Response 5 – Surface Water Management.
2	Foothill Conservancy	2/27/2023	2-19	Energy	Energy Conservation	Describe how energy-efficient design and renewable energy will be incorporated into new development. Reference: Policies C-5.4, C-10.5.	DEIR Sections 4.6.4–4.6.6 and Impacts 4.6-1 to 4.6-3 identify that the originally proposed WWSP would temporarily increase energy use and consumption during construction and permanently increase energy demands during operation. These potential impacts would mitigated to less than significant levels with implementation of MM ENE-1. This measure requires evaluation of renewable energy sources to meet up to 70% of project needs, consideration of electricity storage, installation of solar panels, addition of electric vehicle (EV) charging stations, and compliance with CCR Title 24 standards and the California Green Building Standards Code (CALGreen), among other measures, to reduce energy use and GHG emissions. Because the DEIR identifies impacts as less than significant with mitigation, CEQA does not require additional mitigation beyond MM ENE-1; thus, General Plan Policies C-5.4 and C-10.5 are adequately addressed.
2	Foothill Conservancy	2/27/2023	2-20	GHG) Emissions	GHG Reduction	Explain how the plan will meet GHG reduction targets and include MMs. Reference: Policy C-10.2.	DEIR Section 4.8.4 and Impact 4.8-2 identified that the originally proposed WWSP is consistent with General Plan policies, including those encouraging walking, biking, and transit, but does not demonstrate achieving the 15% reduction in vehicle travel, as required by Policy C-10.2. Estimated emissions [19,740 metric tons of carbon dioxide equivalent (MT CO_2e)/year], including amortized construction, exceed SB 32 and California Air Resources Board (CARB) Scoping Plan targets; however, VMT reductions of 24–36% are close to meeting the 2030 goal of a 25% reduction but fall short of the 2045 goal of 30%. Even with implementation of MM GHG-1 and MM GHG-2, the DEIR concluded that impacts remain significant and unavoidable. Future WWSP development proposals would be subject to refined project definition, CEQA and County review, and compliance with GHG reduction targets and policies in effect at time a developer submits a proposal. See Response to Comment 2-10.
2	Foothill Conservancy	2/27/2023	2-21	Wildfire; Public Services	Fire Protection	Provide details on fire-safe design, emergency access, and adequate fire protection services for high-risk areas. Reference: Policies LU-12.3, S-2.1, S-2.2, S-2.3.	Refer to Master Response 2 – Fire Protection Services.
2	Foothill Conservancy	2/27/2023	2-22	Noise	Noise	Identify noise MMs for construction and long-term impacts and explain how pedestrian/bicycle networks will reduce traffic noise. Reference: Policies N-1.3, N-2.4.	DEIR Section 4.11.5 and Impact 4.11-1 identify significant short-term construction noise impacts from equipment generating 76–90 A weighted decibel (dBA) Lmax at 50 feet, potentially affecting nearby residences and Argonaut High School. MM NOI-1 requires a Construction Management Plan with measures such as limiting work hours (7 a.m.–10 p.m.), using noise-reduction devices, prohibiting unnecessary idling, and installing temporary sound barriers to reduce impacts to less than significant levels. Operational traffic noise increases are identified as less than significant, and WWSP Design Guidelines include strategies for incorporating noise attenuation into project design (e.g., masonry walls). Future land uses and conditions of approval would require demonstrated compliance with County standards. DEIR Section 6.0 indicates that the Reduced Development Project would lower development and proportionally reduce construction activities and associated noise, and the application of MM NOI-1 would ensure that impacts remain less than significant. Operational traffic noise impacts would also be less due to fewer vehicle trips.

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3	Commissioner Mark Bennett	7/4/2024	3-1	Transportation	Public Transit	Incorporate bus stops into the initial development plans, not as an afterthought. Locate bus stops near affordable apartment buildings, and if possible, integrate them into adjacent structures for shelter.	Refer to Master Response 3 – Transportation Requirements.
3	Commissioner Mark Bennett	7/4/2024	3-2	Transportation	Public Transit	Ensure sidewalks and greenways are wide enough to accommodate bus shelters and allow space for school buses or rental buses for group outings. Referenced Policy: Policy 6.1, AB 1358.	Refer to Master Response 3 – Transportation Requirements.
3	Commissioner Mark Bennett	7/4/2024	3-3	Transportation	Public Transit	Provide detailed planning for transit stops and shuttle rerouting to avoid future conflicts. Coordinate with local transit operators to expand service to the WWSP area.	Refer to Master Response 3 – Transportation Requirements.
3	Commissioner Mark Bennett	7/4/2024	3-4	Transportation and Public Services	Transportation and Public Services	Provide detailed planning for multi-model circulation and public transit, and public services and facilities.	Refer to Master Response 2 – Fire Protection Services, Master Response 3 – Transportation Requirements, Master Response 4 – Wastewater Service Requirements, and Master Response 5 – Surface Water Management.
4	William (Bill) May	7/19/2024	4-1	Land Use & Planning	Project Scale	The project is much too large; reduce proposed housing units from 700 to no more than 150-200 units.	The County is advancing the WWSP Reduced Development Project, which will lower development in biologically sensitive areas. See Responses to Comments 2-4, 20-1 and 20-4.
4	Bill May	7/4/2024	4-2	Utilities & Service Systems	Water & Wastewater	Confirm whether AWA can supply water and wastewater services.	Refer to Master Response 4 – Wastewater Service Requirements.
4	Bill May	7/4/2024	4-3	Utilities & Service Systems	Solid Waste	Clarify if Amador County Environmental Service (ACES) is committed to providing solid waste services.	DEIR Sections 2.5 and 4.16.3 identifies that ACES provides solid waste disposal and recycling as the County's contracted franchise hauler. ACES is now owned and operated by Republic Services Inc., which has the same solid waste agreement with the County. Municipal solid waste is processed at the Western Amador Recycling Facility and residual waste is disposed at the Kiefer Landfill, which has sufficient capacity through 2080. Future WWSP development would require similar public service infrastructure, including solid waste disposal and recycling. See Response to Comment 2-10.
4	Bill May	7/19/2024	4-4	Wildfire; Public Services	Fire Protection	Verify that California Department of Forestry and Fire Protection (CAL FIRE) and other fire departments are committed to wildfire protection for the site and surrounding properties, including Walmart and residential areas.	Refer to Master Response 2 – Fire Protection Services.
4	Bill May	7/4/2024	4-5	Public Services	School Safety	Ensure schools are protected and children have safe routes in surrounding areas.	Refer to Master Response 3 – Transportation Requirements.
4	Bill May	7/4/2024	4-6	Biological Resources	Natural Resources	Provide plans to protect natural resources, including trees, flora, and fauna.	Throughout the DEIR and specifically Section 4.4, plans to protect natural resources, including trees, flora, and fauna are identified and MM BIO-1 through MM BIO-7 include provisions to preserve oak woodlands, riparian features, grasslands and special-status plants, wildlife, and sensitive habitat. Future development would require the same mitigation and regulatory compliance and result in reduced impacts. See Response to Comment 2-10.
4	Bill May	7/19/2024	4-7	Transportation	Roadway Plans & Design	Confirm that concrete roadway plans are in place.	Refer to Master Response 3 – Transportation Requirements.
4	Bill May	7/4/2024	4-8	Land Use & Planning	Airport Compatibility	Guarantee airport compatibility for the project.	Refer to Master Response 1 – Westover Field Airport Compatibility.

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4	Bill May	7/4/2024	4-9	Land Use & Planning	Public Notification	Explain how community buy-in will be obtained.	As described in FEIR Section 2.0, the WWSP and EIR processes have been ongoing since 2021 and between public comment periods on the Draft WWSP in 2021, NOP to solicit comments on the scope of the WWSP EIR in early 2023, the 45-day public comment period on the Draft EIR, and the public comment hearing before the Planning Commission in August 2024, there have been adequate opportunities for public review and comment. See Response to Comment 17-4.
4	Bill May	7/19/2024	4-10	Transportation	Public Transit	Confirm whether public transportation through Amador Transit Service or other agencies has been secured.	Refer to Master Response 3 – Transportation Requirements.
4	Bill May	7/4/2024	4-11	Land Use & Planning	Residential Uses	Describe how residential policies will be established and enforced.	See Response to Comment 2-4.
4	Bill May	7/4/2024	4-12	Land Use & Planning	WWSP	Explain why Martell was chosen as the preferred location for the regional service center (RSC).	As described in FEIR Section 2.0, the concept of development on the WWSP site has been ongoing for more than 20 years. The WWSP and the DEIR describe the current development proposal which, both the originally proposed WWSP and the WWSP Reduced Development Project concentrate land uses and housing types to meet provide a mix of land uses consistent with General Plan policies and RHNA commitments. The WWSP Reduced Development Project will preserve more open space; sensitive habitats; including oak woodlands and rolling hills; and maintain the County's rural character and natural beauty. The WWSP and DEIR identify that the General Plan identifies Martell as the RSC, which has historically been the preferred location for development because it draws people from throughout the County and the surrounding region. General Plan Goal LU-11 focuses services that cater to a regional retail in Martell and Policy LU-11.1 identifies that the County shall develop guidelines to govern future land uses within the Martell RSC to include a mix of industrial, commercial, residential, public facility, and other uses. Due to the proximity of the WWSP to the Martell RSC, implementation of the Reduced Development Project would be compatible with this goal. See Responses to Comments 12-6 and 20-1.
4	Bill May	7/4/2024	4-13	Aesthetics	Airport Safety/ Lighting & Glare	Clarify approach to lighting: bright lights or dark skies.	Refer to Master Response 1 – Westover Field Airport Compatibility.
4	Bill May	7/4/2024	4-14	Land Use & Planning	CEQA Compliance	Confirm whether a full EIR or an ND will be prepared.	As noted during the NOP Scoping period in February 2023, the County determined that preparation of an EIR was the appropriate environmental review document for the originally proposed WWSP to comply with CEQA. See Response to Comment 2-10.
4	Bill May	7/4/2024	4-15	Land Use & Planning	Economic Impact	Discuss impact on neighborhood property and home values.	The DEIR did not analyze economic impacts because CEQA does not require such analysis unless these impacts result in physical environmental effects. Environmental impacts are disclosed in resource analyses in DEIR Sections 4.1 through 4.17. DEIR Sections 2.0 and 6.0 and FEIR Section 2.0 identify the County's goals for implementation of the WWSP to include a mix of land uses intended to maintain a neutral/positive economic impact and plan for long-term growth to meet changing demographics and market demands over a 20-year horizon. See Response to Comment 20-1.
5	Bill May	7/20/2024	5-1	Biological Resources	Wildlife & Species Protection	Explain how the County or developer will ensure protection of birds, bees, wildlife, and endangered species during project implementation.	Throughout the DEIR and specifically Section 4.4, plans to protect natural resources, including trees, flora, and fauna are addressed and MM BIO-1 through MM BIO-7 include provisions to protect oak woodlands, sensitive and riparian habitats, grasslands, and wildlife. Future WWSP development will be subject to compliance with natural resource protection policies in effect at the time of proposal when the County can ensure that birds, bees, oak trees, shrubs, wildlife, and endangered species will be protected. See Response to Comment 2-10.

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5	Bill May	7/20/2024	5-2	Biological Resources	Wetland & Creek Protection	Describe measures to prevent contamination of Rock Creek and other wetlands during construction activities.	Future WWSP development will be subject to compliance with natural resource protection policies in effect at the time of proposal when the County can ensure that birds, bees, oak trees, shrubs, wildlife, endangered species, and water resources are protected, i.e., Rock Creek and other on-site wetlands during construction activities. DEIR Section 6.0 indicates that mitigation and regulatory compliance would apply to the smaller WWSP Reduced Development Alternative #4, biological resource impacts would be reduced, and opportunities for preservation of wetlands, riparian areas, and special-status species' habitats would be provided. See Responses to Comments 5-1 and 8-4.
6	SWRCB	7/30/2024	6-1	Utilities & Service Systems	Water Service	Confirm whether WWSP will connect to the AWA-Tanner water system or the City of Jackson system. If AWA-Tanner will serve the project, provide details and a figure showing the connection point and any required infrastructure upgrades. If the City of Jackson will serve the project, explain commitments or agreements needed to secure water service.	Refer to Master Response 4 – Wastewater Service Requirements.
6	SWRCB	7/30/2024	6-2	Utilities & Service Systems	Groundwater Well	Provide ownership information for the proposed contingency groundwater well (AWA-Tanner or City of Jackson). Include location map, groundwater quality assessment, potential treatment needs, estimated well capacity, pumping triggers, frequency and duration of pumping, impacts on nearby wells, and sustainability thresholds for the aquifer.	Refer to Master Response 5 – Surface Water Management.
6	SWRCB	7/30/2024	6-3	Utilities & Service Systems	Water System Infrastructure	If additional infrastructure (e.g., treatment upgrades and storage tanks) will not be analyzed in a future tiered document, include maps of potential locations, construction timing/phasing, and discuss environmental impacts (i.e., hydrology, surface water quality, and groundwater quality) from construction and operation.	Refer to Master Response 4 – Wastewater Service Requirements.
6	SWRCB	7/30/2024	6-4	Utilities & Service Systems	Urban Water Management Plan (UWMP)	Make the County UWMP publicly available as required for documents incorporated by reference.	Refer to Master Response 5 – Surface Water Management.
6	SWRCB	7/30/2024	6-5	Land Use & Planning	Agency Notification	After EIR certification, provide the following to the SWRCB, Division of Drinking Water (DDW) Stockton District: 1) Copy of EIR and MMRP; 2) All comment letters and Lead Agency responses; 3) Resolution or Board of Supervisor's minutes adopting EIR and MMRP; 4) Date-stamped Notice of Determination (NOD) filed with the County Clerk and State Clearinghouse.	The County acknowledges that any future development will be subject to compliance with natural resource protection policies in effect at the time of proposal when the County can ensure that water resources are protected, i.e., CDFW, Regional Water Quality Control Board (RWQCB), and United States Army Corps of Engineers (USACE). Further, the County will comply with all required CEQA noticing, posting, and filing requirements associated with these regulatory requirements. See Responses to Comments 2-10 and 8-7.
7	Commissioner David Wardall	8/8/2024	7-1	Hazards & Hazardous Materials	Airport Safety	Conduct a critical study to ensure sufficient open space remains for aircraft to make an emergency landing after takeoff with engine failure.	Refer to Master Response 1 – Westover Field Airport Compatibility.
7	Commissioner David Wardall	8/8/2024	7-2	Hazards & Hazardous Materials	Airport Safety	Provide a map showing the proposed development layout in relation to the airport runway alignment and distance.	Refer to Master Response 1 – Westover Field Airport Compatibility.

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8	CDFW	8/9/2024	8-1	Biological Resources	Special-Status Plants	DEIR Section 4.4.6 MM BIO-1, revise MM BIO-1 to set a higher minimum compensatory mitigation ratio for off-site mitigation with defined success criteria to ensure no-net-loss of special-status plant habitat.	DEIR Section 4.4.6 and WWSP Section 9.0 address natural resource protection for special-status plant species and associated habitats. MM BIO-1 requires that focused surveys for special-status plants occur between April and June, avoidance of plants where possible, and off-site mitigation at a minimum 1:1 ratio if impacts occur, consistent with State and federal regulatory requirements. MM BIO-1 requires that a preserve management plan be approved by the County and appropriate agencies prior to grading. Future development review would refine project details and address success criteria to ensure no-net-loss of special-status plants and associated habitat. See Response to Comment 2-10.
8	CDFW	8/9/2024	8-2	Biological Resources	Nesting Birds	Revise MM BIO-3 to require avoidance of active nests and establish species-specific buffers determined by a qualified biologist. Include requirements for seasonal timing and re-surveys after work stoppages of 14 days or more. Referenced Section: MM BIO-3, DEIR 4.4.6.	MM BIO-3 requires conducting pre-construction avian species nesting surveys by a qualified biologist within 14 days of grading and re-surveys after work stoppages of 14 days or more, seasonal construction timing restrictions, and buffers of 500 feet for raptors and 200 feet for migratory birds, consistent with Migratory Bird Treaty Act (MBTA) and CDFW codes. Future development would be subject to CEQA and County review and compliance with applicable regulatory agency procedural requirements and refinement of project details.
8	CDFW	8/9/2024	8-3	Biological Resources	Jurisdictional Waters / Streambed Alteration	Revise MM BIO-6 language to fully reflect Fish and Game Code §1602 notification requirements for activities affecting streams, including ephemeral and subsurface flow watercourses. Referenced Section: MM BIO-6, DEIR 4.4.6.	The County will comply with applicable regulatory requirements related to filing the NOD with CDFW and payment of CEQA-compliance filing fees subject to PRC § 21092, §21092.2. MM BIO-6 requires that developers obtain a CDFW Lake or Streambed Alteration Agreement under Fish and Game Code §1602, including notification and approval of a Riparian Mitigation Plan and SWPPP before stream zone activities occur; and compliance with CEQA and applicable regulatory requirements, including coordination with regulatory agencies for permits and mitigation plans. DEIR Section 6.0 indicates that the same mitigation and regulatory requirements would apply to the WWSP Reduced Development Alternative #4, but impacts would be reduced and more opportunities for increased habitat preservation would occur.
8	CDFW	8/9/2024	8-4	Biological Resources	Riparian Habitat	Revise MM BIO-6 to set higher compensatory mitigation ratios for riparian habitat creation and mitigation bank credits, with success criteria to ensure no-net-loss. Referenced Section: MM BIO-6, DEIR 4.4.6.	DEIR Section 4.4.6 and WWSP Section 9.0 address natural resource protection for riparian habitats. MM BIO-6 requires a CDFW-approved Riparian Mitigation Plan, no-net-loss of riparian habitat, and compensatory mitigation through on-site habitat creation at a 2:1 ratio or mitigation bank credits at a 1:1 ratio, consistent with Fish and Game Code §1602 and CDFW requirements. Future development proposals would be subject to refined project definition, County and CEQA review, and riparian habitat protection. See Response to Comment 2-10.
8	CDFW	8/9/2024	8-5	Biological Resources	Special-Status Wildlife	Add an MM requiring Swainson's Hawk nesting surveys following the five-period schedule in the CDFW technical advisory. If nests are found, consult with CDFW and obtain a California Endangered Species Act (CESA) Incidental Take Permit, if necessary. Referenced Section: DEIR 9.3 Vegetation and Wildlife.	DEIR Section 4.4 and WWSP Section 9.0 addresses natural resource protection. Future development will be subject to compliance with natural resource protection policies in effect at the time of proposal when the County can consider adding species-specific measures to comply with CESA and other regulatory requirements. See Response to Comment 2-10.
8	CDFW	8/9/2024	8-6	Biological Resources	Agency Notification	Submit all detected special-status species and natural communities to the California Natural Diversity Database (CNDDB) using the required form. Referenced Regulation: PRC §21003(e).	MM BIO-1 requires pre-construction on-site plant surveys to identify the presence or absence of special-status plants. If discovered, these plants would be avoided. If avoidance is not possible, then appropriate mitigation would be implemented. Implementation of MM BIO-1 would reduce the potential for construction activities to impact special-status species or result in habitat loss or degradation. With implementation of MM BIO-1, impacts would be reduced to less than significant. Adoption of the WWSP requires that future development proposals will be subject to CEQA and County review and updating baseline data in conformance with PRC §21003(e).

LETTER #	COMMENTER	LETTER DATE	COMMENT #	CEQA RESOURCE TOPIC AREA	COMMENT TOPIC	COMMENT DETAILS	RESPONSES
8	CDFW	8/9/2024	8-7	Biological Resources	Agency Notification	Ensure payment of CDFW filing fees upon filing the NOD, as required for project approval. Referenced Regulation: 14 CCR §753.5; Fish and Game Code §711.4; PRC §21089.	The County will comply with applicable regulatory requirements related to filing the NOD with CDFW and payment of CEQA-compliance filing fees subject to PRC §§ 21092, 21092.2. MM BIO-6 requires developers to obtain a CDFW Lake or Streambed Alteration Agreement under Fish and Game Code §1602, including notification and approval of a Riparian Mitigation Plan and Storm Water Pollution Prevention Plan (SWPPP) before stream zone activities occur, and compliance with CEQA and applicable regulatory requirements, including coordination with regulatory agencies for permits and mitigation plans. DEIR Section 6.0 indicates that mitigation and regulatory compliance would apply to the WWSP Reduced Development Alternative #4, which would lessen impacts and allow more opportunities for habitat preservation.
8	CDFW	8/9/2024	8-8	Biological Resources	Agency Notification	Provide written notification of proposed actions and pending decisions to CDFW at the specified address or e-mail. Referenced Regulation: PRC §§21092, 21092.2.	See Response to Comment 8-7.
9	CHP	8/6/2024	9-1	Transportation	Traffic	Address potential traffic congestion at the intersection of Wicklow Way and SR-88, which currently lacks traffic controls for SR-88. Include MMs to reduce the risk of increased traffic collisions.	Refer to Master Response 3 – Transportation Requirements.
9	CHP	8/6/2024	9-2	Transportation	Traffic	Evaluate traffic impacts at intersections of Hoffman Street/SR-49 and Argonaut Lane/SR-49, which are currently uncontrolled for SR-49 traffic. Provide additional traffic control measures to mitigate congestion and safety risks at these intersections.	Refer to Master Response 3 – Transportation Requirements.
10	John Kirkpatrick		10-1	Land Use & Planning	Land Uses	Correct Figure 2-4 to show the property south of the project as agricultural (AG), not R1-A.	DEIR Section 2.0 Figure 2-4, Existing Zoning, identifies that the property south of the WWSP boundary is designated as R1-A, Single-Family Residential Zone, under County zoning. During preparation of the DEIR, the County advised that R1-A is the appropriate zone designation and inconsistencies in County plans will be corrected by the County as part of future plan and mapping changes.
10	John Kirkpatrick		10-2	Project Description	Project Description	Revise page 2-7 to accurately describe the property south of the project as developed (i.e., fences, wells, and water tank present).	DEIR Sections 2.3 and 3.3 identify that the site is presently undeveloped, fenced, and used for leased cattle grazing, with grasslands, oak woodlands, ephemeral drainages, and one perennial creek, as well as adjacent uses, including commercial uses to the north and residential uses/Argonaut High School to the east/southeast. Figures 2-4 and 2-5 and Section 2.5 identify zoning as R-1, C-1, and R-3 with General Plan designations RSC and RM. In addition, the WWSP establishes PD zones (PD-R1, PD-R2, PD-R3, PD-CC, P/PQ, OS, PR). See Response to Comment 20-1.
10	John Kirkpatrick		10-3	Project Description	Project Description	Update page 2-7 to reflect the correct easement date of August 19, 1929 (page 4-5-4 is correct).	DEIR Section 2.0, Farmland Classification, identifies the existing easement that allows cattle passage across the WWSP site. See Responses to Comments 2-8 and 10-2.
10	John Kirkpatrick		10-4	Project Description	Easements & ROW	Clarify whether the easement will follow the eastern and southern boundaries of the project, as stated on page 2-7.	Refer to Master Response 3 – Transportation Requirements.
10	John Kirkpatrick		10-5	Project Description	Wastewater	Address wastewater plans for the southeast corner of the project (page 2-23 references only the northeast corner).	Refer to Master Response 4 – Wastewater Service Requirements.
10	John Kirkpatrick		10-6	Biological Resources	Perennial Stream and Riparian Habitat	Explain why the perennial stream (likely Stoney Creek) with a larger drainage area than Rock Creek has no retention pond in the project (page 4.4-7).	DEIR Section 4.4 includes a description of on-site drainage features. Future development proposals would be subject to refined project definition and County and CEQA review and address specific on-site drainage requirements and features. See Response to Comment 2-10.

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10	John Kirkpatrick		10-7	Hydrology & Water Quality	Storm Water	Confirm treatment of the unnamed stream (Stoney Creek) shown in Figure 4.4-2 running through the LDR portion of the project.	Refer to Master Response 5 – Surface Water Management.
10	John Kirkpatrick		10-8	Cultural Resources	Historical Setting	Correct page 4.5-6 regarding land transfers by the commenter's ancestors; clarify that the transferred parcels north and south of SR-88 (6.29 and 12.21 acres) are not in the project area.	Future CEQA documentation will refine project details and historical facts where they are relevant to the subject development.
10	John Kirkpatrick		10-9	Hydrology & Water Quality	Storm Water	Clarify why Figure 4.10-3 shows a 71 acre-feet storm water detention basin on Ruddick La Belle property [Assessor's Parcel Number (APN) 044-100-025-000] outside the project area.	Refer to Master Response 5 – Surface Water Management.
10	John Kirkpatrick		10-10	Hydrology & Water Quality	Storm Water	Explain why no storm water detention is shown on the southwest corner of the project, which has a larger drainage area.	Refer to Master Response 5 – Surface Water Management.
10	John Kirkpatrick		10-11	Utilities & Service Systems	Wastewater Infrastructure	Address why Figure 3.1 does not show a wastewater lift station on the southwest portion of the project.	Refer to Master Response 4 – Wastewater Service Requirements.
10	John Kirkpatrick		10-12	Land Use & Planning	Easements & ROW	Explain the 489-foot-long, 60-foot-wide easement shown on Parcel Map No. 1697 at the southeast corner of the project.	DEIR Section 4.2 identifies the existing cattle grazing and passage lease and the intent to maintain cattle transfer from private grazing lands located north and south of the WWSP eastern site boundary to a specified cattle passage along the eastern and southern boundaries of the WWSP site. The WWSP identifies that whenever there is a transition from residential or commercial use to open space or agricultural land, landscaped buffers shall be incorporated into project design. The County's decision to advance the WWSP Reduced Development Project will result in less overall development and increased opportunities for open space and the preservation of rural character. This reduction in developed land result in less impacts and future development proposals would incorporate the specific location for the grazing lease to ensure land use compatibility.
10	John Kirkpatrick		10-13	Land Use & Planning	Site Design	Requests a solid fence or wall between private property and project site to prevent unauthorized access, waste disposal, and trees overgrowing onto private property.	The WWSP and WWSP Appendices A and B include information and guidance regarding perimeter fencing and land use transitions. The WWSP Reduced Development Project will meet the same requirements as the originally proposed WWSP, but the reduced development will result in the need for less perimeter fencing. Future development will be subject to compliance with WWSP policies and guidance regarding the treatment of perimeter fencing and transitions between open space and livestock grazing areas, preservation of sensitive habitats and oak woodlands, and compliance with vegetation fuel management for fire protection. Refer to Master Response 2 – Fire Protection Services and Responses to Comments 2-10 and 24-8.
10	John Kirkpatrick		10-14	Hydrology & Water Quality	Drainage	Identifies that creek crossings on Stoney Creek and Rock Creek are hard to maintain.	Refer to Master Response 5 – Surface Water Management.
10	John Kirkpatrick		10-15	Land Use & Planning	Easements & ROW	Question regarding cattle easement.	Refer to Response to Comment 10-12.
10	John Kirkpatrick		10-16	Utilities & Service Systems	Wastewater Infrastructure	Concerns about WWTP and pumping station and associated odors and spills..	Refer to Master Response 4 – Wastewater Service Requirements.
11	Commissioner David Wardall	8/13/2024	11-1	Hazards & Hazardous Materials	Airport Safety	Address minimum safety aspects for the proposed land use plan to protect aviation safety and allow pilots to survive an engine failure during takeoff.	Refer to Master Response 1 – Westover Field Airport Compatibility.

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11	Commissioner David Wardall	8/13/2024	11-2	Hazards & Hazardous Materials	Airport Safety	Consider adopting an airport land use protection plan similar to Eagles Nest, which includes avigation easements and designated safety overrun areas.	Refer to Master Response 1 – Westover Field Airport Compatibility.
11	Commissioner David Wardall	8/13/2024	11-3	Hazards & Hazardous Materials	Airport Safety	Provide clear mapping of proposed development in relation to airport runway alignment and identify any avigation easements or safety zones included in the plan.	Refer to Master Response 1 – Westover Field Airport Compatibility.
12	April Barcenas	8/14/2024	12-1	Land Use & Planning	Public Notification	The project was not properly publicized; citizens were unaware, as shown by low meeting attendance. Increase public notification and visibility for the project so all County residents are informed.	As described in FEIR Section 2.0, the WWSP and EIR process has been ongoing since 2021 and between public comment periods on the Draft WWSP in 2021, the NOP to solicit comments on the scope of the WWSP EIR in early 2023, the 45-day public comment period on the Draft EIR, and the hearing before the Planning Commission in August 2024, there have been adequate opportunities for public review and comment.
12	April Barcenas	8/14/2024	12-2	Land Use & Planning	Public Notification	Living near the proposed development would negatively impact personal quality of life. Consider these impacts when evaluating project approval.	DEIR Sections 4.1–4.17 evaluated all CEQA resource areas and Impact 4.12-1 acknowledges that population growth and housing development would result in significant and unavoidable impacts. DEIR Section 6.6.4 explains that the WWSP Reduced Development Alternative #4 was selected to lessen impacts while meeting RHNA targets.
12	April Barcenas	8/14/2024	12-3	Land Use & Planning	Public Notification	The WWSP will increase traffic, noise, lighting, and population, similar to school consolidation impacts. Address traffic and noise MMs in project planning.	See response to Comment 12-1.
12	April Barcenas	8/14/2024	12-4	Land Use & Planning	Public Notification	Roads, schools, and services are already underfunded; unclear how this and other projects will be financed. Provide a clear explanation of funding sources for the development and related projects.	DEIR Section 2.5 identifies that the originally proposed WWSP includes funding mechanisms to maintain a neutral or positive fiscal impact and that phasing and funding obligations will be detailed in future Development Agreements. DEIR Section 4.13 describes that parks would be funded through Development Impact Fees under the Quimby Act and other sources, such as grants and sponsorships. Transportation improvements would be funded by developers per RTP requirements, as described in Impact 3.0-2. The WWSP Reduced Development Project would lower development intensity and proportionally reduce physical infrastructure and funding needs.
12	April Barcenas	8/14/2024	12-5	Land Use & Planning	Public Notification	Potential destruction of land, removal of oak trees, and infringement on property rights. Address easement questions and resource protection measures in the plan.	See Responses to Comments 13-5, 13-6, 22-2 and 24-14.
12	April Barcenas	8/14/2024	12-6	Land Use & Planning	Public Notification	Concentrating housing in one area will create greater impacts. Explore spreading housing units across the county in smaller developments to reduce concentrated impacts.	As described in FEIR Section 2.0, consideration of development on the WWSP site has been ongoing for more than 20 years. The WWSP and DEIR include explanations of site development. Both the Proposed the WWSP and the WWSP Reduced Development Project provide a mix of land uses consistent with the WWSP and General Plan policies and meet RHNA targets. The WWSP Reduced Development Project will allow for more open space, preservation of sensitive habitats, including oak woodlands and rolling hills, and maintenance of the County's rural character and natural beauty. See Responses to Comments 4-12 and 20-1.
12	April Barcenas	8/14/2024	12-7	Land Use & Planning	Public Notification	Development will replace rolling hills and oak trees with tract housing, permanently altering the County's identity. Reconsider approving the WWSP to maintain the County's rural character and natural beauty.	See Responses to Comments 4-12, 12-6, and 20-1.
13	Foothill Resource Management	8/14/2024	13-1	Biological Resources	Oak Woodland	Revise DEIR to correctly classify entire 201-acre property as Oak Woodland per Fish and Game Code §1361 and PRC §21083.4	See Responses to Comments 13-5, 13-6, and 24-14.

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13	Foothill Resource Management	8/14/2024	13-2	Biological Resources	Oak Woodland	Include required MMs including conservation easements and contributions to the Oak Woodlands Conservation Fund in the DEIR. Identify Mother Lode Land Trust as the holder of conservation easements.	See Responses to Comments 13-5, 13-6, and 24-14.
13	Foothill Resource Management	8/14/2024	13-3	Land Use & Planning	Land Use	Correct inconsistencies between land use tables and maps (e.g., Parks and Recreation acreage and Open Space totals).	The DEIR addresses impacts associated with full build-out of the WWSP over a 20-year period. CEQA specifically acknowledges that Specific Plan impacts are to be addressed at a programmatic level and that future land uses may generate impacts internally within the WWSP area. Like the originally proposed WWSP, the Reduced Development Project is planned to be built out over a 20-year period but has less demands for connecting to existing potable and wastewater facilities, eliminates the on-site WWTP and elementary school, eliminates LDR, focuses on providing market-rate and affordable housing, allows for flexibility to increase the acreage for the preservation of natural and public open space resources, and maintains rural character. With the allowance for refinement of WWSP details once development proposals are submitted, this process allows for flexibility, and therefore, the correction of inconsistencies is not required.
13	Foothill Resource Management	8/14/2024	13-4	Biological Resources	Oak Woodland	Correct references to 37 acres and calculate true impacted acreage (approximately 125.2 acres). Require conservation easements equal to impacted acreage.	See Responses to Comments 13-5, 13-6, and 24-14.
13	Foothill Resource Management	8/14/2024	13-5	Biological Resources	Oak Woodland	Update mitigation for Oak Woodlands on page 4.4-29, including accurate acreage and naming Mother Lode Land Trust.	The Reduced Development Project will allow for dedication of more acreage for the preservation of open space and natural resources, conservation of existing oak woodlands and natural areas, and retention of rural character. Future development proposals would define impact acreages, mitigation, and on- and off-site preservation sites, including identification of a specific Land Trust, as appropriate. See Response to Comment 2-10.
13	Foothill Resource Management	8/14/2024	13-6	Biological Resources	Oak Woodland	Extend maintenance period for planted native oaks from 7 years to at least 10 years based on lessons from Sutter Creek Bypass mitigation.	MM BIO-7 requires on-site oak tree replacement at ratios [1:1 for trees =5–12" diameter at breast height (dbh) and 3:1 for trees >12" dbh] and maintenance for 7 years, including annual reporting and oversight by a qualified professional. The County acknowledges that future development will be subject to compliance with natural resource protection policies in effect at the time of proposal, when the County can consider increasing the replacement ratios and maintenance periods associated with native oak tree restoration.
13	Foothill Resource Management	8/14/2024	13-7	Wildfire	Wildfire	Add reference to the Butte Fire of 2015 in Section 4.17.2 and correct Oak Woodland acreage in that section.	Refer to Master Response 2 – Fire Protection Services.
13	Foothill Resource Management	8/14/2024	13-8	Biological Resources	Oak Woodland	Revise Section 6.19 to accurately reflect impacts to Oak Woodland.	See Responses to Comments 13-5, 13-6, and 24-14.
13	Foothill Resource Management	8/14/2024	13-9	Biological Resources	Oak Woodland	Amend policies under 4.4-4 to include enforceable acreage requirements, correct misnumbering (Policy 9.19 -9.9), clarify vague language, and specify native tree protections.	DEIR Section 4.4.2 and the WWSP Section 9.0 address natural resource protection, including policies related to the removal and preservation of oak woodlands. MM BIO-7 is intended to comply with PRC §21083.4. Future development proposals would need to address native tree protection. See Responses to Comments 2-10, 13-5, 13-6, and 24-14.
13	Foothill Resource Management	8/14/2024	13-10	Public Services	Schools	Set aside 10 acres adjacent to Argonaut High School for potential campus expansion if high school consolidation occurs. Retain County ownership to ensure availability.	DEIR Section 4.13, Impact 4.13-1 identifies that ACUSD has sufficient capacity for projected students and that SB 50 fees provide full mitigation under CEQA. The DEIR also addresses cumulative impacts, Impact 4.13-4, and includes MM PS-1 to address financing and phasing of public services. While infrastructure limitations, such as cafeterias, restrooms, and utilities, are noted as aging in DEIR Section 4.14.3, the DEIR identifies that compliance with applicable policies and MMs ensures school-related impacts would remain less than significant. The Reduced Development Project does not include a new school; therefore, conflicts with a new school within the WWSP site no longer exist.
14	William (Bill) May	8/14/2024	14-1	Land Use & Planning	WWSP	Permanently withdraw the WWSP stating that even a reduced housing unit count (150-200) is impractical.	See Responses to Comments 2-4, 20-1, and 20-4.

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14	Bill May	8/14/2024	14-2	Utilities & Service Systems	Water Supply & Wastewater	Provide clear commitments from AWA regarding its ability to supply water and wastewater services.	Refer to Master Response 4 – Wastewater Service Requirements.
14	Bill May	8/14/2024	14-3	Utilities & Service Systems	Solid Waste	Confirm whether ACES is committed to providing solid waste services for the project.	See Response to Comment 4-3.
14	Bill May	8/14/2024	14-4	Public Services	Historical Setting	Obtain guaranteed commitments from CAL FIRE and other fire agencies to provide wildfire protection for residents, businesses, and the airport.	Refer to Master Response 2 – Fire Protection Services and Response to Comment 5-2.
14	Bill May	8/14/2024	14-5	Land Use & Planning	Public Notification	Identify specific strategies for achieving community buy-in for the project.	See Responses to Comments 4-9 and 17-4.
14	Bill May	8/14/2024	14-6	Biological Resources	Wildlife & Habitat Protection	Explain how birds, bees, oak trees, shrubs, wildlife, and endangered species will be protected during and after development.	Throughout the DEIR and specifically Section 4.4, plans to protect natural resources, including trees, flora, and fauna are addressed. MM BIO-1 through MM BIO-7 include provisions to protect oak woodlands, sensitive and riparian habitats, grasslands, and wildlife. Future development would be subject to compliance with natural resource protection policies in effect at the time of proposal so that the County can ensure that birds, bees, oak trees, shrubs, wildlife, and endangered species will be protected. See Response to Comment 2-10.
14	Bill May	8/14/2024	14-7	Biological Resources	Wetland & Creek Protection	Describe measures to prevent contamination of Rock Creek and other wetlands during construction.	See Response to Comment 5-2.
14	Bill May	8/14/2024	14-8	Land Use & Planning	Economics	Discuss impact on neighborhood property and home values	The EIR does not analyze economic impacts because CEQA does not require such analysis unless it results in physical environmental effects. Environmental impacts are disclosed in resource analyses in DEIR Sections 4.1 through 4.17. DEIR Sections 2.0 and 6.0 and FEIR Section 2.0 identify the County's goals for implementation of the WWSP that specifically identify a mix of land uses intended to maintain a neutral/positive economic impact and plan for long-term growth to meet changing demographics and market demands over a 20-year horizon. See Response to Comment 20-1.
14	Bill May	8/14/2024	14-9	Transportation	Student Safety & Transit	Clarify how students' safety will be protected and how public or private transit will function to keep children safe.	DEIR Section 4.14.4 and WWSP policies identify that circulation will be Americans with Disabilities Act (ADA)-compliant and include sidewalks and bike paths to promote safe access. DEIR Section 6.6.4 identifies that the WWSP Reduced Development Alternative #4 would be subject to the same regulations and standards as the originally proposed WWSP regarding site access and safety, but the reduced size would result in lower transportation impacts. The County is advancing the Reduced Development Project, which eliminates the new on-site elementary school; thus, site-specific concerns associated with a new school no longer exist.
15	Caltrans	8/15/2024	15-1	Transportation	Caltrans	If construction activities encroach into State ROW, submit an Encroachment Permit application to Caltrans District 10 with CEQA documentation, technical studies, and evidence of tribal consultation.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-2	Biological Resources	Wildlife	Conduct pre-construction bird surveys by a qualified biologist if work occurs between February 1 and September 30. Establish protective buffers around active nests per CDFW guidelines and provide survey results to Caltrans before construction.	See Response to Comment 8-2.
15	Caltrans	8/15/2024	15-3	Biological Resources	Water Resource	Provide copies of permits or correspondence with CDFW, USACE, and RWQCB for any impacts to protected water resources within State right-of-way (ROW).	The County will comply with applicable State and federal regulatory requirements related to protection of water resources. Future development will be subject to compliance with natural resource protection policies in effect at the time of proposal to ensure that water resources are protected, i.e., CDFW, RWQCB, and USACE. See Responses to Comments 2-10 and 8-7.

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15	Caltrans	8/15/2024	15-4	Biological Resources	Federal Species	Submit evidence of Section 7 consultation with U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service and provide National Environmental Policy Act (NEPA) documentation for review before Encroachment Permit approval.	The County will comply with applicable federal regulatory requirements related to the potential presence of State or federal endangered plant and wildlife species and will provide evidence of USFWS Section 7 Consultation, if applicable. DEIR Section 6.0 indicates that mitigation and regulatory compliance would still apply to the WWSP Reduced Development Alternative #4, but impacts would be reduced since this alternative would provide opportunities for increased habitat and special-status species preservation.
15	Caltrans	8/15/2024	15-5	Hydrology & Water Quality	Drainage and Hydrology	Ensure project does not increase peak flows into State ROW and runoff meets storm water quality standards. Submit pre- and post-construction runoff calculations for two 10-year/24-hour storm events and Drainage and Grading Plans for review.	DEIR Sections 4.10.4 and 4.16 identify that the originally proposed WWSP includes detention basins and drainage facilities designed to convey 100-year storm flows and maintain pre-development runoff rates. With proposed improvements, flooding impacts were determined to be less than significant (Impact 4.10-3). DEIR Section 6.6.4 indicates that Best Management Practices (BMPs) and design features would lower runoff and pollutant loading for the Reduced Development Project and impacts would be less than the originally proposed WWSP. Refer to Master Response 5 – Surface Water Management and Response to Comment 24-12.
15	Caltrans	8/15/2024	15-6	Hydrology & Water Quality	Storm Water	Store or mitigate any increase in runoff on-site. Do not allow additional runoff into State ROW or impact existing State drainage facilities and culverts.	Refer to Master Response 5 – Surface Water Management.
15	Caltrans	8/15/2024	15-7	Transportation	Traffic	Provide electronic Synchro files, SimTraffic history files, and raw traffic count data for review. Include 95th percentile queue analysis using SimTraffic v.12 with proper coding, seed time, record time, and multiple simulation runs.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-8	Transportation	Intersections	Address pedestrian and vehicle traffic impacts from Westview Drive and provide largest truck turning analysis at SR-88/Wicklow Way. Determine if intersections at SR-49 and SR-108 along SR-88 need to be analyzed in conjunction.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-9	Greenhouse Gas Emissions	GHG	Ensure the EIR evaluates all environmental impacts comprehensively, including off-site, cumulative, indirect, and operational impacts, not just construction impacts. Strengthen mitigation language to make measures enforceable and remove vague terms like “where” and “when feasible.”	DEIR Section 4.8.4 and Impact 4.8-1 identify that construction emissions total 14,680 MT CO_2e and operational emissions are 19,251 MT CO_2e/year, with amortized construction emissions adding 489 MT CO_2e/year for a combined total of 19,740 MT CO_2e/year. MMs GHG-1 and GHG-2 require use of Tier 4 engines, zero-emission equipment, EV charging infrastructure, and 15% building energy reduction; however, even with these measures, emissions remain inconsistent with SB 32 and the 2022 Scoping Plan. Therefore, project-specific and cumulative impacts were identified to be significant and unavoidable. Future development will be subject to compliance with GHG reduction measures and policies in effect at the time of proposal to ensure that all direct and indirect environmental impacts are disclosed. See Responses to Comments 2-10 and 2-11.
15	Caltrans	8/15/2024	15-10	Greenhouse Gas Emissions	GHG Mitigation	Add additional MMs to reduce VMT and enhance carbon sequestration, such as tree planting, improved transit service, EV charging stations at off-site locations, and climate-adaptive complete streets with shade and cover at transit stops.	DEIR Section 4.8.6, MMs GHG-1 and GHG-2 include construction and operational strategies, such as Tier 4 engines, zero-emission equipment, EV charging stations, transit stops, sidewalks, bikeways, and building energy efficiency improvements (e.g., solar, cool roofs, CALGreen Tier 1/2). These measures aim for a 15% reduction in building emissions and encourage urban tree planting and water conservation. Despite accounting for these measures and amortized construction emissions, the DEIR concludes impacts remain significant and unavoidable. Future development proposals would be subject to compliance with traffic and transportation, air quality and GHG MMs, and policies in effect at the time of proposal to ensure that future direct and indirect impacts are disclosed. See Response to Comment 2-10.

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15	Caltrans	8/15/2024	15-11	Wildfire	Wildfire Evacuation	Provide detailed analysis of expected vehicle volumes during emergency evacuations and assess potential strain on SR-88 and SR-49 to determine if additional measures are needed for safe evacuation.	Refer to Master Response 2 – Fire Protection Services.
15	Caltrans	8/15/2024	15-12	Air Quality	Valley Fever	Evaluate long-term operational exposure risks for residents and visitors, consider a health risk assessment (HRA), and conduct soil testing. Coordinate with Caltrans to ensure highway workers are informed of Valley Fever risks during construction.	See Response to Comment 22-5. Future off-site road and highway improvements in the vicinity of the WWSP would be subject to project-specific CEQA compliance and subsequent application of MMs and regulatory requirements to address potential impacts from construction activities and fugitive dust.
15	Caltrans	8/15/2024	15-13	Transportation	Traffic	Update traffic analysis to include seasonal adjustment factors and summer counts, correct land use codes for trip generation, and clarify growth rate assumptions in cumulative conditions analysis.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-14	Transportation	Circulation	Support efforts for compact, mixed-use, and mixed-income development with transportation options beyond single-occupancy vehicles. Include separated and protected bicycle lanes, traffic calming, and road diet features to improve safety and accessibility. Provide a more detailed map showing proposed transportation features.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-15	Transportation	Caltrans Coordination	Continue consultation with Caltrans to identify and address cumulative transportation impacts from this and nearby projects to maintain traffic safety and quality standards.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-16	Transportation	Project Review	Allow Caltrans to review and comment on any future projects arising from the Specific Plan.	Refer to Master Response 3 – Transportation Requirements.
15	Caltrans	8/15/2024	15-17	Transportation	Encroachment Permit	Submit an Encroachment Permit application to Caltrans if activities encroach into State ROW, including required environmental studies analyzing cultural, biological, hazardous waste, and other resources.	Refer to Master Response 3 – Transportation Requirements.
16	Caltrans	8/16/2024	16-1	Transportation	Traffic Mitigation	Clarify that project proponents must pay mitigation fees into the Regional Traffic Mitigation Fee (RTMF) program per the approved fee schedule.	Refer to Master Response 3 – Transportation Requirements
16	Caltrans	8/16/2024	16-2	Transportation	Signal Installations	Ensure applicants contribute their fair share toward installing traffic signals at Wicklow Way/SR-88 and Wicklow Way/Main Walmart Entrance.	Refer to Master Response 3 – Transportation Requirements.
16	ACTC	8/16/2024	16-3	Transportation	Bypass/ Safety	Maintain the proposed MMs but also address potential underestimation of Wicklow Way Extension's role as a bypass and its impact on traffic safety. Condition approvals with fair share contributions for improvements at Wicklow Way Extension and Stoney Creek intersection.	Refer to Master Response 3 – Transportation Requirements.

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16	ACTC	8/16/2024	16-4	Transportation	Traffic Safety	Analyze traffic safety impacts independently of VMT, as required by CEQA Section 21099(b)(3), to address risks such as long queues, rear-end collisions, and unsafe driver behavior.	Refer to Master Response 3 – Transportation Requirements.
16	ACTC	8/16/2024	16-5	Transportation	Mitigation	Identify traffic safety impact thresholds and timelines for implementing mitigation improvements, ensuring fair share contributions and construction responsibilities are clearly defined.	Refer to Master Response 3 – Transportation Requirements.
16	ACTC	8/16/2024	16-6	Transportation	Traffic	Conduct a detailed queueing analysis including turning movement counts, trip generation/distribution, and Synchro/SimTraffic modeling to adequately study traffic safety.	Refer to Master Response 3 – Transportation Requirements.
16	ACTC	8/16/2024	16-7	Transportation	Roadways	Reserve extra ROW along Wicklow Way Extension for future transportation needs, including an additional travel lane, considering bypass functionality, school consolidation, and evacuation planning.	Refer to Master Response 3 – Transportation Requirements.
16	ACTC	8/16/2024	16-8	Transportation	Roadways	Address the potential role of the Sutter Street Extension Project in relieving regional traffic impacts and its relationship to Wicklow Way Extension.	Refer to Master Response 3 – Transportation Requirements and Response to Comment 2-7.
16	ACTC	8/16/2024	16-9	Transportation	Traffic Safety	Amend DEIR MMs to require a comprehensive traffic safety analysis as a condition of future project approvals.	Refer to Master Response 3 – Transportation Requirements.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-1	Project Description	Acreages	Correct inconsistencies between the WWSP, Notice of Availability (NOA), and DEIR regarding acreage allocations and land use descriptions to ensure clarity and accurate project understanding. Clarify maximum square footage for community commercial and civic components. Ensure consistency across the Specific Plan, DEIR, NOA, and technical studies like transportation.	See Response to Comment 20-1.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-2	Project Description	Residential Development	Provide accurate and consistent descriptions of residential development intensities and correct errors in dwelling unit totals in the Specific Plan.	See Response to Comment 20-1.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-3	Population & Housing	Population Estimates	Align population estimates across the DEIR, NOA, and Specific Plan to eliminate discrepancies and provide a clear understanding of project impacts.	See Response to Comment 20-1.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-4	Hazards & Hazardous Materials	Public Notification	Recirculate the Hazards and Hazardous Materials section after including site-specific studies and MMs to ensure compliance with CEQA and proper disclosure of risks.	As described in FEIR Section 2.0, the WWSP and EIR process have been ongoing since 2021 and between public comment periods on the Draft WWSP in 2021, NOP to solicit comments on the scope of the WWSP EIR in early 2023, the 45-day public comment period on the Draft EIR, and hearing before the Planning Commission in August 2024, there has been several opportunities for public review and comment. CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions and do not trigger recirculation, which is the case for the WWSP and EIR.

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17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-5	Public Services	Schools	Revise the DEIR to analyze all impacts related to schools beyond facilities, including traffic, noise, air quality, biological resources, and pedestrian safety, as required by CEQA and case law.	DEIR Section 4.13, Impact 4.13-1 identifies that ACUSD has sufficient capacity for projected students and that the assessment and payment of SB 50 fees would provide full mitigation under CEQA. This Section analyzes potential impacts related to school facilities, including student generation, capacity, and provision for an elementary school site, and concludes that school-related impacts would be less than significant with SB 50 compliance. The DEIR also evaluates other environmental impacts such as traffic in Section 4.14, noise in Section 4.11, air quality in Section 4.3, and biological resources in Section 4.4 and each section addresses whether there are impacts to new or physically altered school facilities. While infrastructure limitations such as cafeterias, restrooms, and utilities are noted as aging in the DEIR Environmental Setting, the DEIR demonstrates that compliance with applicable policies and mitigation measures would ensure that school-related impacts remain less than significant. The DEIR also addresses cumulative impacts, Impact 4.13-4, and includes MM PS-1 that addresses financing and phasing of public services. As noted in FEIR Section 2.0, the County is advancing the WWSP Reduced Development Alternative that does not include a new school, therefore conflicts associated with a new school no longer exist. See Response to Comment 13-10.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-6	Public Services	Schools	Coordinate with the ACUSD to ensure the designated elementary school site meets State law and California Department of Education (CDE) guidelines, including compliance with County Code Section 17.28.230 and evaluation by State agencies.	The WWSP Reduced Development Project results in population generation below the thresholds requiring for the provision of a new elementary school, and therefore, a new school is no longer needed. Subsequent CEQA environmental review will disclose refined details regarding the number of new residents and identify compliance with local, State, and federal regulations. Future County conditions of approval are also expected to define and enforce compliance with regulatory requirements. See Responses to Comments 13-3, 17-16, and 24-20.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-7	Public Services	School Site – Airport Proximity	Address potential restrictions under Education Code Section 17215 due to proximity to Amador County Airport, which may require Department of Transportation (DOT) Aeronautics Program approval and could render the site unusable for a school.	Elimination of the school site from the Reduced Project Alternative negates application of Education Code 17215. Refer to Master Response 1 – Westover Field Airport Compatibility.
18	Lozano Smith Attorneys at law on behalf of the ACUSD	8/17/2024	17-8	Public Services	School Site – Airport Proximity	Address potential restrictions under Education Code Section 17215 due to proximity to Amador County Airport, which may require DOT Aeronautics Program approval and could render the site unusable for a school.	Elimination of the school site from the Reduced Project Alternative negates application of Education Code 17215. Refer to Master Response 1 – Westover Field Airport Compatibility.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-9	Public Services	Student Safety	Clarify the location of the proposed park relative to the school site and address safety concerns related to roadway crossings and proximity to arterial roads for joint-use purposes.	DEIR Section 4.13.3 and WWSP Policies 4.15 and 7.5 identify that parks shall be located throughout the WWSP area and linked to residential neighborhoods via sidewalks, bike paths, and trails. Section 4.14.3 and Impact 4.14-1 identify that the circulation system includes a hierarchy of roadways and pedestrian facilities designed to connect residential areas to parks, open space, and the future school site, improving safety for joint-use purposes. Section 4.13.4, Impact 4.13-1, and MM PS-1 demonstrate that compliance with applicable policies and MMs ensure that school-related impacts remain less than significant. The WWSP Reduced Development Project does not include a new school; therefore, conflicts no longer exist. Refer to Master Response 3 – Transportation Requirements.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-10	Hazards & Hazardous Materials	Hazards	Recirculate the Hazards and Hazardous Materials section after including site-specific studies and MMs to ensure compliance with CEQA and proper disclosure of risks.	DEIR Section 4.9.3 and Impacts 4.9-1 through 4.9-4 identify that encountering hazardous materials during construction and operation would be less than significant as a result of compliance with federal, State, and local regulations. Construction management plans would be required due to conditions of approval for individual developments to ensure adherence to applicable standards. Future development will be subject to further evaluation of potential contaminated soils or subsurface hazards. CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR, including the potential to encounter on-site hazardous materials or conditions. See Response to Comment 2-10.

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17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-11	Hazards & Hazardous Materials	Site Contamination	Conduct soil and water sampling and site-specific hazardous materials studies to assess contamination risks from nearby mines and streams. Revise the Hazards and Hazardous Materials section to include MMs, such as Phase I/II Environmental Site Assessments (ESAs), remediation plans, and construction management plans.	DEIR Section 4.9.3 and Impact 4.9-4 confirm that the site has historically been used for cattle grazing and is not listed on hazardous materials databases [e.g., Department of Toxic Substances Control's (DTSC'S) EnviroStor and SWRCB'S GeoTracker]. A review of sites within 1 mile identified five off-site locations in various stages of remediation, but none are anticipated to pose a threat to development at the WWSP site. Future development will be subject to further evaluation of potentially contaminated soils or subsurface hazards and compliance with local, State, and federal regulations that require Phase I/II ESAs, remediation, and construction management plans. See Responses to Comments 2-10 and 17-10.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-12	Public Services	School Site Acreage	Correct discrepancies in school site acreage across project documents (8.5 acres vs. 8.8 acres) and update Impact 4.13-1 analysis accordingly.	The WWSP Reduced Development Project eliminates the new elementary school and allows for refinement of WWSP details once development proposals are submitted and subsequent CEQA environmental review is conducted. The CEQA process for programmatic EIRs allows for flexibility, and therefore, correction of inconsistencies is not required. See Responses to Comments 13-3 and 17-16.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-13	Public Services	School Site	Work closely with the ACUSD to ensure the designated school site is viable, meets CDE and Education Code requirements, and avoids improper deference of hazardous material responsibilities.	See Response to Comment 24-20.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-14	Public Services	School Impact Fees	Include estimated square footage of residential units in the DEIR to evaluate adequacy of developer fees for school impacts. Analyze the disproportionate impact of high-density housing on school facilities and consider phasing implications for planning and funding. Revise the DEIR to address fiscal and social considerations that contribute to physical impacts, such as overcrowding, in compliance with CEQA requirements.	Refer to Master Response 2 – Fire Protection Services and Responses to Comments 24-16 and 24-26.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-15	Public Services	Schools	Expand analysis under CEQA Appendix G to address whether the project would require new or physically altered school facilities and associated environmental impacts. Evaluate infrastructure limitations (e.g., cafeterias, restrooms, and utilities), traffic and safety impacts, and incorporate the ACUSD's School Closure/Consolidation Program into the analysis. Correct inconsistencies in student generation numbers across documents and revise Impact 4.13-1, which incorrectly concludes less-than-significant impacts. Address long-term facility capacity issues, modernization needs, and potential reliance on temporary housing due to aging infrastructure.	See Response to Comment 13-10.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-16	Public Services	Schools	Analyze foreseeable impacts from installing portables and modifying existing school sites, including noise, air quality, loss of greenspace, and traffic safety concerns. Evaluate impacts from changing attendance boundaries, increased bussing, and parent travel patterns.	The DEIR addresses impacts associated with full build-out of the WWSP over a 20-year period. CEQA specifically acknowledges that Specific Plan impacts are to be addressed at a programmatic level and that future land uses may generate impacts internally within a Specific Plan area. The WWSP Reduced Development Project eliminates the elementary school; therefore, this comment no longer applies. See Responses to Comments 2-10 and 13-3.

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17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-17	Public Services	Schools	Consider MMs, such as encouraging developers to participate in a Mello-Roos Community Facilities District (CFD) and phasing permit approvals to ensure school infrastructure is in place before growth occurs. Collaborate with the ACUSD to accurately analyze and mitigate these impacts.	DEIR Section 4.13.6, MM PS-1, identifies that future development proposals will be subject to Development Agreements outlining financing and phasing of public services and that a CFD may be established to fund services such as police, fire, and library. Impact 4.13-1 demonstrates that payment of SB 50 school impact fees is considered full mitigation under CEQA for school impacts. The DEIR identifies that future development would undergo County and CEQA review and comply with applicable policies, and therefore, school-related impacts would remain less than significant. The County is advancing the WWSP Reduced Development Project, which eliminates the new on-site elementary school; thus, site-specific concerns associated with a new school no longer apply.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-18	Noise	Traffic Noise	Redo and recirculate the noise analysis to address deficiencies, including applying City n noise standards, providing complete modeling inputs and outputs, and analyzing cumulative traffic noise impacts. Re-model traffic noise levels using a complete traffic study that accounts for all future uses and evaluates impacts on Argonaut High School and Stoney Creek Road. Specify sound wall heights in MMs instead of deferring details to later studies.	DEIR Section 4.11.5 explains that traffic noise modeling used data from the Transportation Analysis and application of field condition (FICON) criteria in Section 4.14 and included in Appendix F. The originally proposed WWSP is predicted to increase traffic noise by up to 4.4 dBA along Hoffman Street, which does not exceed applicable standards; therefore, impacts are less than significant and no mitigation is required. Cumulative traffic noise impact for the year 2045 was also less than significant. Sound walls are mentioned as a potential attenuation strategy in the WWSP Design Guidelines but are not required because noise limits are met. Future land uses would be required to demonstrate compliance with County standards as conditions of approval. CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-19	Transportation	Trip Generation	Revise and recirculate the Transportation Analysis to include trips from public uses (e.g., school, fire station, and wastewater facility) and off-site student travel. Provide a sight distance and safety evaluation for the Wicklow Way/Stoney Creek Road intersection. Correct trip generation assumptions, including unsupported reductions and incorrect Institute of Transportation Engineers (ITE) codes, and document mixed-use and pass-by trip reductions separately. Reassess growth rate assumptions (0.5% vs. 1–2%) and clarify VMT methodology and thresholds. Ensure traffic modeling accounts for all future uses and cumulative impacts. Justify the VMT threshold used in the DEIR and explain deviations from Office of Planning and Research (OPR) recommendations. Use the Amador County Travel Demand Model instead of relying solely on the VMT+ tool to account for changes in travel patterns caused by the project.	CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR. Refer to Master Response 3 – Transportation Requirements.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-20	Transportation	Pedestrian and Bicycle Safety	Analyze pedestrian and bicycle safety at full build-out and include MMs, such as installing sidewalks along Stoney Creek Road, Argonaut Lane, and Hoffman Lane. Require fair share contributions for improvements at SR-88/49 and Argonaut Lane intersection and provide a signal warrant analysis for Wicklow Way/SR-88.	Refer to Master Response 3 – Transportation Requirements.

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17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-21	Air Quality	Emission Modeling	Update and recirculate the Air Quality, GHG, and Energy analyses to correct discrepancies in trip generation and emissions modeling. Align land use assumptions with the project description and include full square footage for P/QP uses. Quantify health risk impacts to sensitive receptors and require construction HRAs as mitigation. Apply South Coast Air Quality Management District (SCAQMD) Localized Significance Thresholds (LSTs) and ensure modeling inputs and outputs are documented for transparency.	The DEIR addresses impacts associated with the full build-out of the WWSP over a 20-year period. Like the originally proposed WWSP, the WWSP Reduced Development Project is planned to be built out over a 20-year period and as a smaller development it will: connect to existing potable and wastewater facilities to meet on-site demands; eliminate the on-site WWTP and elementary school; eliminate LDR development; focus on providing market-rate and affordable housing; allow for flexibility to increase acreage for the preservation of natural and public open space resources; and maintain rural character. Even with reduced development and implementation of MM AQ-1, AQ-2, AQ-3, AQ-5, AQ-6, Air Quality, GHG, and Energy, impacts remain significant and unavoidable. Because impacts were determined to be significant and unavoidable, overriding considerations will be required, and if made, there is no need to conduct further analysis to certify the FEIR and adopt the WWSP. CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR. See Response to Comment 2-10.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-22	Hydrology & Water Quality	Storm Water	Provide detailed regulatory requirements, performance standards, timelines, and implementation processes for storm water BMPs and LID measures to demonstrate feasibility. Include the Water Supply Assessment (WSA) in the DEIR per SB 610 and make it available for public review. Analyze impacts on the City of Jackson's water system and AWA's storage and treatment capacity, including timelines for capacity assessments and contingency plans if systems cannot accommodate future demand. Recirculate the Hydrology and Utilities sections with these details and mitigation measures.	CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR. Refer to Master Response 5 – Surface Water Management and Response to Comment 17-21.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-23	Public Services	Schools	Provide a detailed cumulative impact analysis for schools and other resources, supported by data, as required by CEQA. Correctly incorporate the ACUSD's School Closure/Consolidation Program Project and evaluate combined impacts on construction noise and transportation. Revise MM PS-1 to include enforceable requirements for school impact fees under SB 50 and mitigation for other school-related impacts. Ensure mitigation measures are fully enforceable and address cumulative impacts to a less-than-significant level.	See Response to Comment 13-10.
17	Lozano Smith Attorneys at law on behalf of the ACUSD	8/16/2024	17-24	Public Services	Coordination & Agency Submittals	Submit all notices and copies of documentation with regard to this Project to the ACUSD directly and also to Lozano Smith Attorneys at Law.	The County WWSP webpage, linked below includes: public notification of WWSP events, including the Public Notice for the December 9, 2021, workshop to receive feedback regarding future development and land uses for the 201-acre Wicklow Way site; January 25, 2023, NOP for the DEIR; February 23, 2023, WWSP Scoping Meeting; and June 28, 2024, Notice of Availability for the DEIR for a 45-day public comment period. See Responses to Comments 4-9 and 12-1. https://www.AmadorCounty.gov/Departments/Planning/Current-Projects/Wicklow-Way-Specific-Plan
18	AWA	8/16/2024	18-1	Utilities & Service Systems	Water Conservation	Update references in the DEIR to reflect current regulations under AWA's Water Code (Ordinance 2022-01) instead of the outdated Water Conservation Plan. Address recent legislation prohibiting irrigation of nonfunctional turf with potable water.	See Response to Comment 2-17.

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18	AWA	8/16/2024	18-2	Utilities & Service Systems	Water Supply	Provide a detailed analysis of Tanner Water Treatment Plant capacity constraints and cumulative demands from other planned developments. Include cost implications from the Water Master Plan Study and evaluate the feasibility and affordability of required expansions.	DEIR Sections 4.13 and 4.16 reference the AWA Water Master Plan Study, which evaluated current deficiencies, recommended improvements, and identified associated costs to accommodate growth over a 20-year planning horizon. Impact 4.13-1a requires that developers pay fair share fees for improvements. As a program EIR for the WWSP intended to guide development over a 20- to 30-year period, future specific water and wastewater needs and capacity analyses will be required when individual proposals are developed. Refer to Master Response 4 – Wastewater Service Requirements and Response to Comment 4-3.
18	AWA	8/16/2024	18-3	Hydrology & Water Quality	Groundwater Well	Analyze the proposed well's location, groundwater availability, potential hydrologic impacts, and water quality concerns. Address disposal or recycling of treated wastewater and evaluate feasibility given the DEIR's conclusion of limited groundwater storage.	Refer to Master Response 5 – Surface Water Management.
18	AWA	8/16/2024	18-4	Utilities & Service Systems	Water Service	Correct DEIR to acknowledge that the City provides water service to the southern Martell area and should be considered the project's water service provider.	Refer to Master Response 4 – Wastewater Service Requirements and Response to Comment 4-3.
18	AWA	8/16/2024	18-5	Utilities & Service Systems	Wastewater Treatment & Recycled Water	Evaluate the impacts of constructing and operating the proposed on-site WWTP, including seasonal storage needs for recycled water, potential National Pollutant Discharge Elimination System (NPDES) permitting challenges, and hydromodification risks to Rock Creek. Quantify recycled water demand and address feasibility of compliance with discharge regulations.	Refer to Master Responses 4 and 5 – Wastewater Requirements and Surface Water Management.
18	AWA	8/16/2024	18-6	Utilities & Service Systems	Wastewater Treatment	Provide a comparative analysis of on-site versus off-site wastewater treatment alternatives, including environmental impacts, feasibility, and cumulative considerations. Address potential use of City of Jackson and Sutter Creek WWTPs, hybrid options, and reduced development scenarios. Correct misstatements about AWA's role and ensure alternatives analysis supports informed decision-making under CEQA.	Refer to Master Response 4 – Wastewater Requirements and Response to Comment 4-3.
18	AWA	8/16/2024	18-7	Utilities & Service Systems	Water Service	Correct inaccuracies in water service descriptions, AWA service area, water delivery volumes, Tanner WTP capacity, and contractual water rights. Revise project description to reflect that the City of Jackson operates the closest water infrastructure. Fix errors in alternative descriptions, mitigation measures, and capacity statements throughout the DEIR.	DEIR Section 4.16.3 identifies AWA as the water purveyor for the WWSP site and identifies connection to the AWA Tanner Water System. The Tanner WWTP has a maximum capacity of 4.4 million gallons per day (MGD) versus a maximum daily demand of 4.49 MGD, creating a deficit. AWA holds water rights totaling 16,150 acre-feet per year (AFY), with Amador Water System (AWS) rights to 15,000 AFY. Future development would refine project details and address specific on-site drainage requirements and features. CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR. Refer to Master Response 5 – Surface Water Management.
19	City of Sutter Creek	8/16/2024	19-1	Utilities & Service Systems	Wastewater Treatment	Modify the WWSP to prioritize conveying and treating all wastewater at the Sutter Creek WWTP and make construction of a new on-site WWTP an alternative rather than the primary approach.	Refer to Master Response 4 – Wastewater Service Requirements and Responses to Comment 4-3.

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19	City of Sutter Creek	8/16/2024	19-2	Utilities & Service Systems	Wastewater	Correct DEIR to acknowledge that Sutter Creek (under contract with AWA) currently provides wastewater treatment for Martell and clarify existing infrastructure including lift stations and gravity-fed conveyance.	Refer to Master Response 4 – Wastewater Service Requirements.
19	City of Sutter Creek	8/16/2024	19-3	Utilities & Service Systems	Wastewater	Include analysis of Sutter Creek's ongoing planning for WWTP upgrades and expanded collection capacity and evaluate feasibility of serving WWSP through existing agreements and infrastructure improvements.	Refer to Master Response 4 – Wastewater Requirements and Response to Comment 4-3.
19	City of Sutter Creek	8/16/2024	19-4	Utilities & Service Systems	WWTP	Provide a detailed comparison of environmental benefits of using an upgraded Sutter Creek WWTP versus constructing an on-site WWTP, including reduced ground disturbance, fewer scenic and odor impacts, lower energy use, and reduced risk of wastewater hazards. Highlight flexibility for phased expansion and potential land use benefits from eliminating the on-site WWTP.	Refer to Master Response 4 – Wastewater Service Requirements.
19	City of Sutter Creek	8/16/2024	19-5	Utilities & Service Systems	Project Description	Revise DEIR statements that incorrectly identify AWA as the wastewater service provider and clarify that approvals for off-site treatment at Sutter Creek WWTP would not require new permits.	Refer to Master Response 4 – Wastewater Service Requirements.
19	City of Sutter Creek	8/16/2024	19-6	Utilities & Service Systems	Alternatives	Update DEIR alternatives discussion to accurately reflect Sutter Creek WWTP as the off-site treatment option and correct references to the City of Jackson WWTP. Ensure analysis supports informed decision-making by comparing environmental impacts of on-site and off-site treatment.	Refer to Master Response 4 – Wastewater Service Requirements.
20	Foothill Conservancy	8/16/2024	20-1	Land Use & Planning	Alternatives	Revise the DEIR to accurately analyze the Foothill Conservancy Alternative based on the scoping comments and land use map submitted in February 2023 and include this corrected analysis in the FEIR.	DEIR WWSP Reduced Development Alternative #4 considered elements of the similar alternative suggested by the Foothill Conservancy in February 2023. The FEIR identifies the WWSP Reduced Development Alternative #4 as the environmentally preferred alternative. The County is now advancing the Reduced Development Project for decision-maker approval. FEIR Section 2.0 includes a refined description of the WWSP Reduced Development Project. Future development proposals would have additional opportunities for public involvement. At full build-out, the WWSP Reduced Development Project would provide approximately 377 residential units, which meets the County's RHNA commitment and would accommodate approximately 830 residents. FEIR Table 2-1 compares the land uses between the WWSP Reduced Development and the originally proposed WWSP. The WWSP Reduced Development project will eliminate LDR development, on-site WWTP and elementary school and result in opportunities to dedicate more acreage to preserve natural resources and open land to maintain rural character. See Response to Comment 2-10.
20	Foothill Conservancy	8/16/2024	20-2	Public Services & Utilities & Service Systems	Public Facilities	Develop a clear and financially feasible public facilities financing plan in coordination with local cities, service providers, and LAFCO for each phase of WWSP build-out, as well as include stronger commitments, timing requirements, and performance standards in the FEIR to support deferred mitigation.	DEIR Section 1.7 identifies LAFCO as a potential responsible agency, DEIR Section 3.2 defines LAFCO jurisdiction, and WWSP Section 10.5 describes the role of LAFCO, Community Service Areas (CSAs), and CFDs related to implementation of the WWSP.

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20	Foothill Conservancy	8/16/2024	20-3	Land Use & Planning	Executive Summary	Expand the Executive Summary in the FEIR to fully disclose areas of controversy raised by agencies and the public, including project size, compatibility with adjacent land uses, provision of utilities and services, and financial feasibility.	DEIR Table ES-2 was prepared in compliance with CEQA requirements. It identifies the level of impacts to all CEQA-mandated resource topics. The FEIR includes responses to all comments raised during the DEIR public comment period thus disclosing areas of controversy raised by agencies and the public, including project size, compatibility with adjacent land uses, provision of utilities and services, and financial feasibility. The County is now advancing the WWSP Reduced Development Project for recommended decision-maker approval and a refined description is included in FEIR Section 2.0. Future development proposals would provide additional opportunities for public involvement. Refer to Master Response 5 – Surface Water Management and Responses to Comments 2-10 and 20-1.
20	Foothill Conservancy	8/16/2024	20-4	Land Use & Planning	Project Description	Provide greater detail on project objectives and planning assumptions, including growth allocation, land use mix, housing affordability, traffic service levels, open space requirements, and fiscal contributions. Include more technical and economic information on storm drainage, noise control, and water/wastewater treatment facilities. Add the County LAFCO to the list of agencies that may rely on this EIR.	See Responses to Comments 2-4 and 20-1.
20	Foothill Conservancy	8/16/2024	20-5	Biological Resources	Oak Woodland	Revise the land use plan to create a transition between low-density residential development and adjacent grazing operations by preserving oak woodland along the western edge of the project area.	DEIR Section 4.4.3 discusses removal and preservation of oak woodlands. MM BIO-7 is intended to comply with PRC §21083.4. As noted in DEIR Sections 1.1 and 2.3, the WWSP site is surrounded by lands currently used for livestock grazing. DEIR Section 2.5 identifies that open space preserves will create natural edges and transitions to buffer agricultural uses and the WWSP identifies design concepts for transitioning from suburban development and preserving oak woodlands. The WWSP Reduced Development Project will provide opportunities for these transitions. See Responses to Comments 13-5, 13-6, and 24-14.
20	Foothill Conservancy	8/16/2024	20-6	Greenhouse Gas Emissions	GHG Mitigation	Consider eliminating natural gas service to reduce GHG emissions and align with climate goals. Quantify expected GHG reductions from transportation-related mitigation measures rather than deferring analysis.	See Responses to Comments 2-11 and 15-9.
20	Foothill Conservancy	8/16/2024	20-7	Hydrology & Water Quality	Storm Water Detention Basin	Provide detailed specifications for proposed storm water detention basins, including depth and capacity, and confirm that sufficient space remains for planned commercial and wastewater treatment uses. Address potential overflow risks and impacts on the adjacent electricity substation.	Refer to Master Response 5 – Surface Water Management.
20	Foothill Conservancy	8/16/2024	20-8	Population & Housing	Growth Inducement	Explain why 2.4 persons per household were used for population calculations and update assumptions based on current trends. Distribute high-density housing across all phases instead of deferring to the final phase to meet housing objectives. Consider ownership options for low-income housing, such as Habitat for Humanity, and describe feasible MMs for growth-inducing impacts, including density bonuses, transfers, and subsidies.	See Response to Comment 20-1.

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20	Foothill Conservancy	8/16/2024	20-9	Public Services	Fire Protection	Expand impact criteria to include increased fire risk and emergency response delays. Identify facilities, staffing, and equipment needed at each development phase to maintain service levels. Address contradictions regarding CEQA exemptions and future review, as well as ensure MMs are enforceable rather than deferred.	Refer to Master Response 2 – Fire Protection Services.
20	Foothill Conservancy	8/16/2024	20-10	Transportation	Traffic Signals	Provide cost estimates and funding details for intersection signalization and confirm fair share contributions will meet mitigation needs. Fully disclose traffic impacts on surrounding roads (i.e., Stoney Creek Road, Hoffman Street, and Argonaut Lane) and incorporate foreseeable projects, such as school consolidation and Sutter Street extension into the analysis.	Refer to Master Response 3 – Transportation Requirements.
20	Foothill Conservancy	8/16/2024	20-11	Utilities & Service Systems	Water Supply	Include a detailed evaluation of water supply needs and options for each development phase, including treatment plant capacity upgrades, costs, and funding responsibilities. Address feasibility concerns for Tanner WWTP expansion and groundwater reliability. Disclose oversubscription of potable water supply and identify safeguards to prevent shortages.	Refer to Master Response 4 – Wastewater Service Requirements and Response to Comment 4-3.
20	Foothill Conservancy	8/16/2024	20-12	Utilities & Service Systems	Alternatives	Provide a corrected alternatives analysis in FEIR that reflects the proper Foothill Conservancy Alternative and includes detailed land use maps and tables for all alternatives. Fully analyze an off-site WWTP alternative (e.g., Sutter Creek or City) as a feasible option that could reduce odor impacts and meet project objectives. Explain why the Hybrid Alternative is insufficient for evaluating off-site treatment.	Refer to Master Response 4 – Wastewater Service Requirements
21	Amador LAFCO	8/19/2024	21-1	Land Use & Planning	LAFCO	Correct DEIR to reflect that the WWSP area is not currently within CSA #4 due to an incomplete annexation (LAFCO Project #226). Include a map and description of the CSA boundaries in the FEIR.	DEIR Section 1.7 identifies LAFCO as a responsible agency for annexations under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CHK Act), which governs orderly growth and boundary changes, and WWSP Section 10.0 addresses implementation and funding sources.
21	Amador LAFCO	8/19/2024	21-2	Hydrology & Water Quality	Drainage	Consider using CSA #4 as the mechanism for coordinating drainage improvements and collecting assessments for the WWSP area. Recommend annexing the entire Specific Plan area into CSA #4 in one application after plan approval to simplify future development phases.	Refer to Master Response 5 – Surface Water Management.
21	Amador LAFCO	8/19/2024	21-3	Land Use & Planning	LAFCO	Identify LAFCO as a potential responsible agency in the EIR to facilitate future annexation of the WWSP area into CSA #4 for drainage services.	DEIR Section 1.7 identifies LAFCO as a potential responsible agency, DEIR Section 3.2 defines LAFCO jurisdiction, and WWSP Section 10.5 describes the role of LAFCO, CSAs, and CFDs related to the implementation of the WWSP. See Responses to Comments 21-1 and 20-2.
22	Jill North	8/16/2024	22-1	Utilities & Service Systems	Water Supply	Clarify who is responsible for providing a 20-year water supply for the project and ensure the DEIR does not defer this requirement by assuming service will be provided without substantiation.	Refer to Master Response 5 – Surface Water Management.

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22	Jill North	8/16/2024	22-2	Land Use & Planning	Project Boundary	Indicate whether the project area is fenced or otherwise delineated beyond John Kirkpatrick's property.	Refer to Master Response 2 – Fire Protection Services and Responses to Comments 2-10 and 24-8.
22	Jill North	8/16/2024	22-3	Transportation	Traffic & Emergency Access	Address future traffic impacts on Hoffman Street from two nearby schools and confirm whether only two entrances/exits are planned. Evaluate emergency access adequacy and consider additional routes for fire safety.	The County is advancing the WWSP Reduced Development Alternative #4, which eliminates the new on-site elementary school; thus, site-specific concerns associated with a new school no longer exist. DEIR Section 6.6.4 identifies that the WWSP Reduced Development Project would be subject to the same requirements for site access and safety, but the reduced size would result in lower transportation impacts.
22	Jill North	8/16/2024	22-4	Wildfire	Fire Protection	Analyze whether property owners and renters will be able to obtain fire insurance in this high fire hazard area and clarify if the County will subsidize insurance costs.	Refer to Master Response 2 – Fire Protection Services.
22	Jill North	8/16/2024	22-5	Air Quality	Valley Fever	Ensure construction workers are informed about Valley Fever risks and MMs. Expand analysis to include public exposure risks for Walmart customers and nearby high school students.	DEIR Section 6.6.4 indicates that the WWSP Reduced Development Alternative #4 would proportionally decrease soil disturbance and dust emissions, lowering Valley Fever risk during construction. MM AQ-6 includes numerous actions to reduce fugitive dust and protect on-site construction workers from potential exposure to Valley Fever spores. It requires the following: preparation of a Valley Fever Management Plan; consultation with California Department of Public Health (CDPH) and County Public Health; and implementation of BMPs, such as dust suppression, worker training, and hygiene protocols. Specific concerns about off-site Valley Fever exposure for customers of the existing Walmart are addressed through the implementation of MM AQ-6 and compliance with the California Building Code (CBC) and regulatory requirements for commercial sites, ensuring adequate air circulation and purification. While the scope of the EIR does not cover uses outside the Specific Plan boundary, such as Argonaut High School, MM AQ-6 also applies to cumulative impacts and will reduce off-site impacts from ground disturbance during construction activities. Despite these measures, the DEIR concludes that this impact remains significant and unavoidable. Development within the WWSP area will comply with all regulatory and CBC requirements for drainage, erosion control, and installation of landscaping after construction to further limit fugitive dust.
22	Jill North	8/16/2024	22-6	Hydrology & Water Quality	Stoney Creek – Bridge	Clarify whether bridges will be constructed over Stoney Creek and evaluate potential traffic and environmental impacts.	Refer to Master Response 5 – Surface Water Management.
22	Jill North	8/16/2024	22-7	Land Use & Planning	Open Space	Combine open spaces to create meaningful habitat areas and include smaller parks, such as dog parks, throughout the development.	The WWSP includes open space land use designations along Rock Creek and in areas with oak woodlands to provide habitat connectivity and recreational opportunities. Advancing the WWSP Reduced Development Project would preserve more open space and recreational opportunities. See Response to Comment 2-3.
22	Jill North	8/16/2024	22-8	Population & Housing	Housing	Avoid placing high-density housing near the airport flight path and evaluates traffic impacts of concentrating 200 units in one area with only two exits. Address potential equity concerns related to housing distribution.	The Affordable Housing Plan guidance included in WWSP Appendix B identifies that higher-density residential development would be located near transit corridors, commercial services, schools, and parks to reduce driving and encourage walking, cycling, and transit use. DEIR Section 3.0, Table 3-1, and Section 4.3 identify that the originally proposed WWSP is consistent with General Plan policies by separating sensitive receptors/uses from developed uses and reducing VMT through land use planning and energy conservation measures. This section also identifies relocation of the southernmost medium-density housing to avoid biologically sensitive lands and maintain habitat connectivity and proportional reductions in higher-density housing. Refer to Master Responses 1 and 3 – Westover Field Compatibility and Transportation Requirements.
22	Jill North	8/16/2024	22-9	Utilities & Service Systems	Wastewater	Consider outsourcing wastewater treatment to Sutter Creek to reduce odor and improve treatment quality.	Refer to Master Response 4 – Wastewater Requirements and Response to Comment 4-3.

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22	Jill North	8/16/2024	22-10	Land Use & Planning	Performing Arts Center	Evaluate the feasibility of including a performing arts center in the project.	While a Performing Arts Center is not specifically identified within the WWSP or the DEIR, prior public input on the Draft WWSP in 2021 and the 2023 NOP for the EIR expressed that the County consider this use. The WWSP objectives broadly presented in the WWSP, DEIR, and FEIR identify that the purpose of the WWSP is to create a planned community with a mix of land uses, a sense of community, and civic uses, as well as parks and open space to benefit a changing County demographic. DEIR Section 2.0 identifies that the P/QP land use designation includes community-serving uses, such as civic, education, public services, and identifies a potential 10-acre site for consolidation of County administrative offices/civic center over a 20-year period. CEQA specifically addresses that a Specific Plan's impacts are to be addressed at a programmatic level. Future development proposals will determine the specific P/QP uses/amenities. See Responses to Comments 2-2 and 2-10.
22	Jill North	8/16/2024	22-11	Biological Resources	Vernal Pools	Ensure vernal pool surveys are conducted during appropriate seasonal conditions rather than in November.	DEIR Section 4.4 and WWSP Section 9.0 addresses natural resource protection. Future development proposals would be subject to refined project definition, County and CEQA review, and compliance with natural resource protection policies in effect at the time of proposal, when the County can ensure that sensitive habitat studies are conducted during appropriate seasons, i.e., vernal pools.
23	Commissioner David Wardall	3/7/2023	23-1	Hazards & Hazardous Materials	Airport Safety	Commenter references the previously submitted comment by the Amador County Airport and request those concerns to be addressed.	Refer to Master Response 1 – Westover Field Airport Compatibility
24	Bill May	8/13/2024	24-1	Land Use & Planning	Project Size	Limit the project to a maximum of 150-200 houses to reduce overall impact on the community.	The County is advancing the WWSP Reduced Development Project. See Responses to Comments 2-4 and 20-1
24	Bill May	8/13/2024	24-2	Land Use & Planning	Community Cohesion	Redesign the project so that it fosters unity rather than division among residents.	See Responses to Comments 14-8 and 22-10.
24	Bill May	8/13/2024	24-3	Land Use & Planning	Economic Impact – Local Businesses	Ensure project does not harm local businesses, such as Walmart, Safeway, and Walgreens.	The WWSP Retail, Commercial, and Office (C-1) land use designation provides, *"a broad range of neighborhood and regional serving retail goods and services such as a grocery, drug store, restaurants, cafes, offices, personal services, and shops of approximately 100,000 square feet. One 12.1-acre parcel is planned in the northeast portion of the site. Located near the intersection of SR-88 and Wicklow Way, this site is suitable for retail uses and has excellent access needed for commercial or office services. Pedestrians and bicyclists from the WWSP area can access this commercial site via Wicklow Way and sidewalk, pedestrian pathways, bike path, and street systems."* At this time, there are no current development proposals for the originally proposed WWSP land uses. Future development proposals will provide additional opportunities for public involvement. See Response to Comment 2-10.
24	Bill May	8/13/2024	24-4	Land Use & Planning	Alternatives	Consider shutting down the current plan and starting over with a lower-impact alternative.	The County is advancing the WWSP Reduced Development Project. See Responses to Comments 2-4 and 20-1.

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24	Cindy	8/13/2024	24-5	Public Services	Schools and Public Safety	Address potential increases in traffic congestion and crime associated with the project.	DEIR Section 4.13.3 concludes that implementation of the WWSP would increase demand for police services, but only one additional officer would be needed and no new facilities would be required to provide adequate service to meet conformance with CEQA, General Plan, and MM PS-1. DEIR Impact 4.13-1 identifies that the ACUSD has sufficient capacity for projected student enrollment and school impacts would remain less than significant with the assessment and payment of SB 50 fees. Sections 4.13.2 and 4.14.3 identify policies, emergency service provisions, existing Amador Transit Route 5 service, and proposed roadway extensions needed to maintain adequate fire, emergency medical services (EMS), transit, and transportation connectivity. As addressed in DEIR Section 4.14, VMT is used as the CEQA metric and LOS as the local planning/policy consistency metric. The DEIR concluded that with the implementation of MMs, compliance with applicable policies, payment of impact fees, and compliance with Development Agreements, impacts would be less than significant. The WWSP Reduced Development Project will lower population and proportionally decrease demand for police services. A new elementary school is no longer required due to a lower school-age population and confirmation that the ACUSD has adequate existing capacity, and therefore, it would result in less than significant impacts to public services and transportation/circulation features.
24	John Kirkpatrick	8/13/2024	24-6	Biological Resources	Wetlands	Confirm the exact locations and extent of wetlands on the site through refined environmental studies.	See Response to Comment 5-2.
24	John Kirkpatrick	8/13/2024	24-7	Biological Resources	Invasive Species	Implement measures to prevent invasive species or toxic weeds from entering the site via incoming trucks.	MM BIO-4 requires BMPs during construction, including erosion control and hydroseeding with native species to prevent habitat degradation and maintain ecological integrity. MM AQ-1 requires measures to reduce tracking of mud into or out of the WWSP site during construction activities, which will limit fugitive dust and spreading of invasive species or toxic weeds from round-trip truck traffic. WWSP Appendix B includes a plant palette for trees and shrubs intended to provide a mix of drought-tolerant native and non-native plant species and requires ongoing maintenance of common landscaped areas to address proliferation of invasive species or toxic weeds.
24	John Kirkpatrick	8/13/2024	24-8	Land Use & Planning	Fencing	Provide solid fencing or a 100-foot buffer to protect adjoining property	DEIR Section 4.17.3 and WWSP Policy 9.8 require fuel modification zones and vegetation management adjacent to open space areas to create defensible space. Compliance with County Fire and Building Codes also requires fire-safe setbacks and provisions for emergency access. The WWSP and WWSP Appendices A and B include information and guidance related to perimeter fencing. The WWSP Reduced Development Project will be subject to the same requirements as the originally proposed WWSP, but the reduced development will result in lower amounts of development and reduced fire risk.
24	John Kirkpatrick	8/13/2024	24-9	Utilities & Service Systems	Drainage & Wastewater	Address concerns about drainage in and out of the property and mitigate odors from the WWTP.	Refer to Master Response 4 – Wastewater Service Requirements and Response to Comment 24-12.
24	John Kirkpatrick	8/13/2024	24-10	Agriculture & Forestry Resources	Agricultural Easement	Address cattle easement.	See Responses to Comments 2-8 and 10-2.
24	John Kirkpatrick	8/13/2024	24-11	Wildfire; Public Services	Fire Protection	Provide solid fencing or a 100-foot buffer to protect adjoining property and ensure fire safety.	Refer to Master Response 2 – Fire Protection Services.
24	John Kirkpatrick	8/13/2024	24-12	Hydrology & Water Quality	Creek Crossings	Develop strategies to maintain creek crossings during winter storms and after project implementation.	The DEIR Section 4.10 indicates that storm events will be managed through a drainage system and detention basins. Flooding impacts were determined to be less than significant (Impact 4.10-3). Refer to Master Response 5 – Surface Water Management.
24	John Kirkpatrick	8/13/2024	24-13	Agriculture & Forestry Resources	Agricultural Easement	Ensure that the existing cattle easement remains valid and is not altered by the project design.	See Response to Comment 2-8 and 10-2.

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24	Steve Cannon	8/13/2024	24-14	Biological Resources	Oak Woodland	Reevaluate the oak woodland acreage, as it may be closer to 201 acres rather than 74, and ensure compliance with PRC §21083.4.	DEIR Section 4.4.3 discusses removal and preservation of oak woodlands from the implementation of the WWSP. MM BIO-7 is intended to comply with PRC §21083.4. See Responses to Comments 13-5 and 13-6.
24	Steve Cannon	8/13/2024	24-15	Biological Resources	Oak Woodland	Apply proper MMs for oak woodland impacts, including conservation easements and funding for the CDFW, without piecemealing or stratifying the property.	DEIR Section 4.4.3 discusses removal and preservation of oak woodlands. MM BIO-7 is intended to ensure compliance with PRC §21083.4. As described in DEIR Section 6.0 and FEIR Section 2.0, the WWSP CEQA environmental review was conducted at a programmatic level. As a result, future development proposals would be subject to refined CEQA analysis, which does not constitute piecemealing the analysis or stratifying the property. See Responses to Comments 2-10 and 24-14.
24	Steve Cannon	8/13/2024	24-16	Public Services	Schools	Offer 5-10 acres to the school district to accommodate potential high school consolidation and future growth needs.	DEIR Section 4.13.2 and 4.13.4 identify that future development proposals will be subject to Development Agreements outlining financing and phasing of public services and that a CFD may be established. Impact 4.13-1 demonstrates that payment of SB 50 school impact fees is considered full mitigation under CEQA. The WWSP Reduced Development Project eliminates the new on-site elementary school; thus, site-specific concerns associated with a new school no longer exist and school-related impacts would remain less than significant. See Response to Comment 2-10.
24	Craig Baracco	8/13/2024	24-17	Land Use & Planning	Alternatives	Include Foothill Conservancy's alternative plan in the EIR analysis, as submitted during the NOP Scoping Session.	See Response to Comment 20-1.
24	Craig Baracco	8/13/2024	24-18	Utilities & Service Systems	Wastewater Treatment	Consider pumping wastewater to an existing regional facility (e.g., Sutter Creek) instead of building an on-site plant to reduce environmental and economic impacts.	Refer to Master Response 4 – Wastewater Treatment Requirements and Response to Comment 4-3.
24	Craig Baracco	8/13/2024	24-19	Population & Housing	Housing	Adopt a land mix that reduces low-density housing and increases medium/high-density units, such as apartments, duplexes, and townhomes to meet workforce housing needs.	See Response to Comment 20-1.
24	Craig Baracco	8/13/2024	24-20	Public Services	Schools	Set aside land for an elementary school and support planning for high school consolidation.	The WWSP Reduced Development Project results in population generation below thresholds requiring the provision of a new elementary school and therefore a new school is eliminated. See Responses to Comments 2-10, 13-3 and 17-16.
24	Craig Baracco	8/13/2024	24-21	Land Use & Planning	Civic Center	Reconfigure the civic center to function as a performing arts venue with space for lectures, art, and community projects, rather than a new county administrative center.	Refer to Master Response 2 – Fire Protection Services and Responses to Comments 2-2, 14-8, 20-1, and 22-10.
24	Susan Peters	8/13/2024	24-22	Land Use & Planning	Alternatives	Clarify whether the second Foothill Conservancy alternative will be analyzed in the FEIR or require a recirculated DEIR to ensure adequate public review.	CEQA Guidelines §15088.5 indicates recirculation is required only if significant new information changes conclusions or impact severity. Minor errors or clarifications that do not alter conclusions do not trigger recirculation, which is the case for the WWSP and EIR. Refer to Master Response 5 – Surface Water Management and Response to Comment 20-1.
24	Susan Peters	8/13/2024	24-23	Utilities & Service Systems	Water/ Wastewater	Include analysis of the City of Jackson's sewer and water systems, which currently serve the area, and correct inaccuracies in the DEIR regarding service providers.	Refer to Master Response 4 – Wastewater Service Requirements and Responses to Comments 4-3, 10-11, 19-2, and 19-5.
24	Susan Peters	8/13/2024	24-24	Public Services	Police & Fire	Evaluate impacts on the City of Jackson's police and fire services, as they are primary first responders for the site.	Refer to Master Response 2 – Fire Protection Services.
24	Susan Peters	8/13/2024	24-25	Transportation	Intersections	Use LOS metrics to assess safety impacts from increased traffic on Stoney Creek Road, Hoffman, and Argonaut.	Refer to Master Response 3 – Transportation Requirements.

LETTER #	COMMENTER	LETTER DATE	COMMENT #	CEQA RESOURCE TOPIC AREA	COMMENT TOPIC	COMMENT DETAILS	RESPONSES
24	Susan Peters	8/13/2024	24-26	Public Services	Interagency Coordination / Capacity	Pause project approval until the County meets with cities to clarify facility locations and service capabilities.	DEIR Section 4.13.2 and WWSP Policy 4.17 identify that land shall be reserved for public services and facilities, including a fire station site and adequate police services. WWSP Section 2.5 and Policy 7.6 identify that the Amador Fire Protection District (AFPD) provides fire protection, suppression, EMS, and hazardous materials management. Impact 4.13-1 identifies that future developers would be subject to Development Agreements under MM PS-1, which requires coordination with service providers and outlines financing and phasing of public services. The WWSP Reduced Development Project no longer includes a new WWTP and elementary school site, but a new fire station is required. Future developers would pay proportional fees in order to maintain consistency with applicable policies and impacts are incrementally reduced compared to the proposed project and would remain less than significant. Refer to Master Responses 2 through 5 – Fire Protection Services, Transportation Requirements, Wastewater Service Requirements, and Surface Water Requirements.
24	Commissioner David Wardall	8/13/2024	24-27	Hazards & Hazardous Materials	Airport Safety	Include an avigation easement and maintain open space for emergency aircraft landings to protect pilot and community safety.	Refer to Master Response 1 – Westover Field Airport Compatibility.
24	Commissioner David Wardall	8/13/2024	24-28	Hazards & Hazardous Materials	Airport Safety	Develop an alternative project layout that shifts the safety area to accommodate aviation needs.	Refer to Master Response 1 – Westover Field Airport Compatibility.
24	John Kirkpatrick	8/13/2024	24-29	Geology / Soils	Site Geology	Acknowledge the presence of large greenstone rocks on the property and consider their impact on development plans.	DEIR Section 4.7.3 notes that the site contains greenstone and other metamorphic rocks as part of the Logtown Ridge Formation, but the DEIR does not identify these features as development constraints. Geologic hazards, such as fault rupture, liquefaction, landslide, and expansive soils, are considered less than significant and addressed by compliance with the CBC and County standards. As described in DEIR Section 6.0 and FEIR Section 2.0, the CEQA environmental review for the WWSP was conducted at a programmatic level. As a result, future development proposals would be subject to refined project definition and CEQA analysis. The County acknowledges that any future development will be subject to compliance with natural resource protection policies in effect at the time of proposal, when the County can require future development to prepare site-specific geotechnical evaluations.
24	Commissioner Bennett	8/13/2024	24-30	Transportation	Emergency Access	Ensure adequate ingress and egress for emergencies and address turning movements and driveway access on curved streets.	Refer to Master Response 2 – Fire Protection Services.
24	Commissioner Bennett	8/13/2024	24-31	Population & Housing	Housing Units	Provide clear rationale for the proposed 700 and 500 housing unit numbers and how they align with State requirements and local needs.	See Response to Comment 20-1.
24	Commissioner Bennett	8/13/2024	24-32	Transportation	Transit	Incorporate bus stops and shelters, including space for larger buses, to support older adults, disabled individuals, and residents without cars.	Refer to Master Response 3 – Transportation Requirements.

APPENDICES

Appendix A: Marked Comments
Appendix B: Mitigation Monitoring and Reporting Plan (MMRP)
Appendix C: Draft Environmental Impact Report (DEIR)