6 OTHER CEQA CONSIDERATIONS

This chapter addresses other California Environmental Quality Act (CEQA) considerations that are required as part of an EIR. These considerations are:

- Cumulative Effects (Section 6.1),
- Growth-Inducing Impacts (Section 6.2),
- Significant Irreversible Environmental Changes (Section 6.3), and
- Significant Unavoidable Environmental Effects (Section 6.4).

6.1 CUMULATIVE EFFECTS

Section 15130 of the State CEQA Guidelines requires an EIR to analyze whether impacts resulting from a proposed project are cumulatively considerable. Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” This chapter identifies cumulative impacts that could be created as a result of implementation of the Draft General Plan.

The cumulative impact from several projects is the change in the environment which results from the incremental impacts of the proposed project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. (State CEQA Guidelines Section 15355(b).)

This Chapter provides an analysis of cumulative impacts of the Draft General Plan taken together with other past, present, and probable future projects producing related impacts. The goal of the County’s analysis is twofold: first, to determine whether the impacts of all such projects would be cumulatively significant; and if so, to determine whether the implementation of the Draft General Plan itself would cause a “cumulatively considerable” (and thus significant) incremental contribution to any such cumulatively significant impacts. (See State CEQA Guidelines Sections 15130[a]-[b], Section 15355[b], Section 15064[h], Section 15065[c]; Communities for a Better Environment v. California Resources Agency [2002] 103 Cal.App.4th 98, 120.) In other words, the analysis intends to first create a broad context in which to assess the Draft General Plan’s incremental contribution to significant cumulative impacts, viewed on a geographic scale beyond the planning area, and then to determine whether the Draft General Plan’s incremental contribution to any significant cumulative impact is cumulatively considerable (i.e., significant). If they are, mitigation measures are then considered for their ability to make the Draft General Plan’s contribution less than cumulative considerable; information on the effectiveness of mitigation measures is presented in the Section 4 resource topic analyses.

6.1.1 METHODS OF ANALYSIS

For the purposes of evaluating cumulative impacts, the State CEQA Guidelines allow the use of two alternative methods to determine the scope of projects to be considered:

List method—A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.

Regional growth projections or “plan” method—A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional conditions contributing to the cumulative impact.

This analysis uses the regional growth projections method (sometimes referred to as “plan” method). This analysis considers population, housing, and employment growth, and associated growth effects (such as changes
in VMT), within Amador County (Unincorporated County area and the cities) as the most appropriate geographical area for examining cumulative impacts.

The significance thresholds for cumulative impacts are the same as those utilized for the Draft General Plan’s direct impacts within each topic area, which are described in DEIR Sections 4.1–4.14 under the headings “Thresholds of Significance.”

6.1.2 REGIONAL GROWTH PROJECTIONS

This analysis generally uses the projections method (sometimes called “the plan method”), with supplemental “list” information. The analysis examines impacts caused by population, housing, and employment growth projections for Amador County and its cities based on city general plans, and the Amador Regional Transportation Plan (2006) prepared by the Amador County Transportation Commission (ACTC). The Draft General Plan assumes growth in the unincorporated area of the County in accordance with Department of Finance (DOF) projections. The city general plans assume different growth rates and end years, so the cumulative growth considered in this section is different from the DOF projections for the entire county (inclusive of the cities).

Where the projections used in the cumulative scenario were not inclusive of later reasonably foreseeable probable future projects (i.e., including the Gold Rush Ranch development in Sutter Creek), impacts of such probable future projects have been added. The projections used in the analysis are presented in Table 6-1. With the exception of the Newman Ridge project, which is currently under environmental review and is included in the cumulative scenario, development proposals that have yet to be entitled by the County as of the preparation of this EIR, and therefore not included in the Project Description, are also not included in this cumulative analysis, as such proposals are not reasonably foreseeable. The request for a Restricted Planning Area designation for the Rancho Arroyo Seco area was withdrawn by the owner. Because no project proposal for the Rancho Arroyo Seco area has been received by the County, there is no reasonably foreseeable probable future project for consideration as part of this cumulative analysis.

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Projected Population (Year)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amador City</td>
<td>357 (2025)</td>
<td>Amador RTP (ACTC 2006)</td>
</tr>
<tr>
<td>Ione</td>
<td>18,182 (2030)</td>
<td>Ione General Plan EIR (City of Ione 2009)</td>
</tr>
<tr>
<td>Jackson</td>
<td>5,617 (2028)</td>
<td>Jackson General Plan (City of Jackson 2008)</td>
</tr>
<tr>
<td>Plymouth</td>
<td>10,070 (2029)</td>
<td>Plymouth General Plan (City of Plymouth 2009)</td>
</tr>
<tr>
<td>Sutter Creek</td>
<td>6,519* (2025)</td>
<td>Amador RTP (ACTC 2006), Gold Rush Ranch EIR (City of Sutter Creek 2008)</td>
</tr>
<tr>
<td>Unincorporated</td>
<td>25,241 (2030)</td>
<td>Table 3-1 in Chapter 3, “Project Description”</td>
</tr>
<tr>
<td>Total</td>
<td>65,986</td>
<td></td>
</tr>
<tr>
<td>Existing Population</td>
<td>37,911 (2011)</td>
<td>Table 4.12-1</td>
</tr>
<tr>
<td>Cumulative Growth</td>
<td>28,075</td>
<td></td>
</tr>
</tbody>
</table>

Note: * Estimated 2025 population of 3,338 from the RTP, with an additional 3,181 residents from the Gold Rush Ranch project)
6.1.3 **Geographic Scope**

The geographic area that could be affected by the Draft General Plan varies depending on the issue topic. The general geographic area associated with different environmental effects of the Draft General Plan was used to define the area considered for cumulative impacts. Significance conclusions and mitigation measures that would reduce impacts would also be generally applicable to cumulative impacts.

Table 6-2 provides information on the geographic scope considered for cumulative impacts on different resource areas addressed in this EIR.

<table>
<thead>
<tr>
<th>Issue Area</th>
<th>Geographic Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aesthetic Resources</td>
<td>Amador County (including cities)</td>
</tr>
<tr>
<td>Agricultural and Forest Resources</td>
<td>Amador County (including cities)</td>
</tr>
<tr>
<td>Air Quality</td>
<td>Mountain Counties Air Basin; CO, TAC, and odor impacts are localized</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>Amador County and related critical habitat areas, including eastern Sacramento and San Joaquin Counties and northwestern Calaveras County</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>Amador County (including cities)</td>
</tr>
<tr>
<td>Geology, Soils, Minerals, and Paleontological Resources</td>
<td>Amador County (including cities) – effects are generally localized; mineral resources (Ione Formation) are important on a statewide scale, and paleontological resources are considered at a broader scale reflecting the extent of paleontologically-sensitive formations in the Sierra Nevada foothills and San Joaquin Valley.</td>
</tr>
<tr>
<td>Greenhouse Gas Emissions</td>
<td>State, Amador County (including cities) (See Chapter 4.7)</td>
</tr>
<tr>
<td>Hazards and Hazardous Materials</td>
<td>Amador County (including cities) – effects are generally localized</td>
</tr>
<tr>
<td>Hydrology and Water Quality</td>
<td>Cosumnes River Subbasin, San Joaquin Valley Groundwater Basin; Mokelumne and Cosumnes River watersheds</td>
</tr>
<tr>
<td>Land Use and Planning</td>
<td>Amador County (including cities).</td>
</tr>
<tr>
<td>Noise</td>
<td>Amador County (including cities) – effects are generally localized</td>
</tr>
<tr>
<td>Population, Employment, and Housing</td>
<td>Amador County (including cities).</td>
</tr>
<tr>
<td>Public Services and Utilities</td>
<td>Service areas for providers</td>
</tr>
<tr>
<td>Traffic and Transportation</td>
<td>Regional and local facilities affected by project-generated land use and traffic</td>
</tr>
</tbody>
</table>
6.1.4 CUMULATIVE IMPACTS

IMPACT
6-1 Cumulative Aesthetic Impacts. Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The Draft General Plan would result in significant impacts related to scenic vistas (Impact 4.1-1), scenic highways (Impact 4.1-2), degradation of existing visual character (Impact 4.1-3), and new sources of light and glare (Impact 4.1-4).

Land use changes that would occur in the planning area with implementation of the Draft General Plan would occur in the context of broader regional growth and land use change, which would create significant cumulative impacts on scenic vistas, visual character, and light and glare. Since the proposed Plan’s impacts on these visual resources are significant, its incremental contributions would be cumulatively considerable and as explained in Section 4.1 there are no feasible mitigation measures to reduce these impacts to less-than-cumulatively considerable levels. Projected growth in cities would not affect conditions along the portion of SR 88 that is designated as a scenic highway, however, so there would be no significant cumulative effects on scenic highways.

IMPACT
6-2 Cumulative Agricultural and Forest Resources Impacts. Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The cumulative context for agricultural and forest resources impacts is the County and its incorporated cities. Because agricultural and forest resources in the planning area represent the largest share of these resources within the County as a whole, the significant impacts resulting from the implementation of the Draft General Plan including Farmland conversion (Impact 4.2-1), conflict with existing agricultural uses (Impact 4.2-3), and conversion of Forestland to non-forest uses (Impact 4.2-5) represent significant cumulative impacts because regional growth would add to these impacts; the Draft General Plan’s contribution to these impacts would be cumulatively considerable.

With respect to conflicts related to increased interface between urban development and agricultural or forest lands, the discussion under Impact 4.2-3 and Impact 4.2-5 qualitatively considers the potential for conversion of agricultural or forest lands due to conflict with incompatible uses, and found these impacts to be significant and unavoidable, even with feasible mitigation. Regional growth would combine with the Draft General Plan’s impacts to create significant cumulative impacts related to conflicts between urban development and agricultural or forest lands, and the Draft General Plan’s contribution to this impact would be cumulatively considerable.

As with the impacts of the Draft General Plan, implementation of Mitigation Measures 4.2-1a, 4.2-1b, 4.2-1c, 4.2-5a, and 4.2-5b would reduce the Plan’s contribution to the above significant cumulative impacts, but after implementation of all feasible mitigation, the Draft General Plan’s contribution to significant cumulative agricultural and forest resources impacts would remain cumulatively considerable. No additional feasible mitigation is available to reduce impacts on Farmland conversion, conflicts with existing agricultural uses, and conversion of Forestland to non-forest uses to less-than-cumulatively considerable levels.

Due to the tiny fraction of land (71 acres) that would be affected by the implementation of the Draft General Plan compared to the total number (93,000 acres) of land under Williamson Act contracts, this impact (Impact 4.2-2), as well as the impact to forest and timber zoning (Impact 4.2-4), are less than significant and are also less than cumulatively considerable.
IMPACT 6-3  Cumulative Air Quality Impacts. Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The cumulative context for air quality impacts is the Mountain Counties Air Basin; as regional growth occurs, the increased population, VMT, and construction of new land uses throughout the basin would result in increased emissions of criteria air pollutants and precursors. Cumulative air quality impacts (both construction and operation impacts), exposure of sensitive receptors to toxic air contaminants (TACs), and exposure of sensitive receptors to odor would be significant. Other air quality impacts, including carbon monoxide (CO) emissions (Impact 4.3-3, a less than significant impact) and naturally occurring asbestos (NOA) (Impact 4.3-5), are related to local conditions and therefore (as for the Draft General Plan) would not be cumulatively significant because regional growth would not add to these impacts.

Construction activities related to implementation of the Draft General Plan could result in significant criteria air pollutant and precursor emissions (Impact 4.3-1). As indicated in Impact 4.3-1, Mitigation Measures 4-3.1a and 4.3-1b would reduce impacts associated with construction related emissions, but not to a less-than-significant level. However, construction related air emissions are temporary, and given the projected amount of growth in Amador County, the extent of simultaneous construction activities are not anticipated to result in a significant cumulative construction emissions impact.

Regional growth would add to the Draft General Plan’s significant air quality effects related to operational emission of criteria air pollutants and precursors (Impact 4.3-2), so cumulative operational air quality impacts would therefore be significant, and the Draft General Plan’s contribution to these impacts would be cumulatively considerable. Implementation of Mitigation Measures 4.3-2a and 4.3-2b could reduce the Draft General Plan’s contribution to this impact, but the Draft General Plan would still result in cumulatively considerable operational air quality impacts. There is no additional feasible mitigation.

Impact 4.3-4 analyzes exposure of sensitive receptors to emissions of toxic air contaminants (TACs), and concludes the Draft General Plan’s impacts are significant. Regional growth would add to the Draft General Plan’s impacts, so cumulative impacts on sensitive receptors would be significant, and the Draft General Plan’s contribution to these impacts would be cumulatively considerable. Implementation of Mitigation Measures 4.3-2a and 4.3-4 could reduce the Draft General Plan’s impacts on sensitive receptors, but the Draft General Plan would still result in cumulatively considerable impacts on sensitive receptors. There is no additional feasible mitigation.

Implementation of the Draft General Plan could result in siting sensitive receptors near existing sources of odorous emissions and thereby create a significant impact (4.3-6). Odor impacts are inherently localized and site-specific, and regional growth would not add to the Draft General Plan’s impacts; cumulative odor impacts would be less than significant.

IMPACT 6-4  Cumulative Biological Resources Impacts. Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The geographic scope for cumulative biological impacts includes the entire County, as well as other nearby related habitat areas in eastern Sacramento and San Joaquin Counties and northwestern Calaveras County. The Draft General Plan would have significant and unavoidable effects on special-status species (Impact 4.4-1) and lorne chaparral (Impact 4.4-3). Significant impacts related to riparian habitat (Impact 4.4-2), oak woodlands (Impact 4.4-4), and wetlands (Impact 4.4-5) would be less than significant after mitigation. The impacts related to the potential for interference with wildlife movement (Impact 4.4-6) is less than significant.

Regional growth would add to the Draft General Plan’s impacts to produce significant cumulative impacts on special status species, lorne chaparral, riparian habitat, oak woodlands, and wetlands, and the Draft General Plan’s contribution to these impacts would be cumulatively considerable. Mitigation measures that would be applied to the Draft General Plan (Mitigation Measures 4.4-1a, 4.4-1b, 4.4-2, 4.4-3, 4.4-4a, 4.4-4b, and 4.4-5) would reduce
these impacts, but the Draft General Plan’s contribution would remain cumulatively considerable. No additional feasible mitigation is available to reduce these impacts to a less-than-cumulatively considerable level.

**IMPACT 6-5  Cumulative Cultural Resources Impacts. Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.**

The cumulative context with respect to cultural resources includes the entire County, where a similar environment and similar historic and prehistoric occupation patterns yield similar resources. Cumulative gains in population, households, and jobs would require a commensurate increase in infrastructure, capital facilities, services, housing, and commercial uses in the planning area and the incorporated cities. Each of these increases carries with it a corresponding increase in the magnitude of ground disturbance and the construction of new buildings and structures and other site development.

The Draft General Plan’s direct impacts on cultural resources related to destruction of or damage to known cultural resources (Impact 4.5-1), as-yet-unknown cultural resources (Impact 4.5-2), and disturbance of human remains (Impact 4.5-3) are significant, but would be reduced to a less-than-significant level and less-than cumulatively considerable with implementation of Mitigation Measures 4.5-1a, 4.5-1b, and 4.5-2. The cumulative impact on cultural resources and human remains would be significant; however, these same mitigation measures would also reduce the Draft General Plan’s contribution to cumulative impacts on cultural resources to a less-than-cumulatively considerable level.

**IMPACT 6-6  Cumulative Geology, Soils, Mineral and Paleontological Resources Impacts. Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.**

Geology and soil hazards (Impact 4.6-1 [seismic ground shaking], Impact 4.6-2 [seismic ground failure], Impact 4.6-3 [landslide or avalanche], Impact 4.6-4 [soil erosion], Impact 4.6-5 [unstable soils], Impact 4.6-6 [expansive soils], and Impact 4.6-7 [soils with poor septic suitability]) are related to conditions and circumstances at specific, individual sites. Although cumulative development in the County and its cities may include numerous projects with geologic and soil impacts, these impacts would affect each individual project, rather than resulting in an additive significant cumulative effect. Therefore, development would not result in a cumulatively considerable impact related to geology and hazards.

Regional growth could add to the Draft General Plan’s significant impact on the availability of known mineral resources (Impact 4.6-8) to create a significant cumulative impact, the Draft General Plan’s contribution to this impact would be cumulatively considerable. Implementation of the Draft General Plan could result in construction of new residential dwellings or non-residential uses in areas near existing or potential sources of mineral resources and could affect the availability of mineral resources. The planning area has substantial mineral resources, including unique resources (such as the Ione Formation). Mitigation Measures 4.6-8a and 4.6-8b would render the Draft General Plan’s incremental impacts less than significant, and therefore less than cumulatively considerable because these measures would require the County to regulate land uses in MRZ-2 zones to ensure compatibility with mineral extraction, and would also evaluate development proposals to substantially reduce or avoid loss of mineral extraction potential, including locally important minerals.

Regional growth could add to the Draft General Plan’s significant impacts on unknown and potentially unique paleontological resources (Impact 4.6-9) to create a significant cumulative impact, and the Draft General Plan’s contribution to this impact would be cumulatively considerable. Implementation of the Draft General Plan would result in construction and other earthmoving activities that could disturb previously unknown paleontological resources in the unincorporated area of Amador County. However, implementation of Mitigation Measure 4.6-9 would reduce the Draft General Plan’s direct impact to less than significant, and would render the Draft General Plan’s contribution to cumulative impacts to less than cumulatively considerable.
**IMPACT**  
**Cumulative Greenhouse Gas Emissions Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

Greenhouse gas emissions impacts are inherently cumulative (Impacts 4.7-1 and 4.7-2), so the Draft General Plan’s significant GHG impacts are also cumulatively considerable contributions to significant cumulative GHG impacts. Implementation of Mitigation Measures 4.7-1a and 4.7-1b (Develop and Implement a Greenhouse Gas Reduction Plan, and Interim Greenhouse Gas Mitigation Actions) would not render the Draft General Plan’s contributions to cumulative GHG impacts less than cumulatively considerable, and the impacts would remain significant and unavoidable. No additional feasible mitigation is available to reduce these impacts to a less-than-cumulatively considerable level. These effects are addressed in Chapter 4.7, “Greenhouse Gas Emissions.”

**IMPACT**  
**Cumulative Hazards and Hazardous Materials Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The cumulative context for hazards and hazardous materials would be the County and its incorporated cities, where similar terrain and transportation systems present similar hazards.

Regional growth in Amador County would lead to a commensurate increase in population and traffic congestion. This would increase the use, transport, and disposal of hazardous materials (Impact 4.8-1). However, as with the Draft General Plan, other regional jurisdictions would follow federal, state and local hazardous materials regulations that would ensure that this cumulative impact would be less than significant.

Regional growth would increase traffic congestion and there would be a significant cumulative impact related to interference with adopted emergency plans (Impact 4.8-2). Additional population growth would increase exposure of people to mine hazards (Impact 4.8-3) and Cortese-listed sites (Impact 4.8-4). The Draft General Plan’s incremental contribution to these impacts would be cumulatively considerable. Implementation of Mitigation Measures 4.8-2a, 4.8-2b, 4.8-3a, 4.8-3b, and 4.8-4, would reduce the Draft General Plan’s direct impacts to less than significant, and would render the Draft General Plan’s contribution to cumulative impacts to less than cumulatively considerable.

Regional growth in Sutter Creek and Jackson would increase the population within 2 miles of an airport (Impact 4.8-5). However, as with the Draft General Plan, compliance with the Airport Land Use Compatibility Plan would result in a less-than-significant cumulative impact.

Growth in the County’s cities would not increase hazards related to private airstrips (Impact 4.8-6) due to the distance between the existing airstrips and city growth areas. This cumulative impact would be less than significant.

Regional growth in Amador County would place an increasing number of residents and structures in wildfire hazard zones (Impact 4.8-7). This cumulative impact would be significant, and the Draft General Plan’s incremental contribution would be cumulatively considerable. Implementation of Mitigation Measures 4.8-7a and 4.8-7b would reduce the Draft General Plan’s contribution to this impact, but the incremental contribution would remain cumulatively considerable. No additional feasible mitigation is available to reduce this impact to a less-than-cumulatively considerable level.

**IMPACT**  
**Cumulative Hydrology and Water Quality Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

Development that would occur pursuant to the Draft General Plan and growth in the County’s cities would combine to create significant cumulative impacts related to water quality and erosion (Impacts 4.9-1 through 4.9-3). Mitigation Measures 4.9-1a, 4.9-1b, 4.9-1c, 4.9-2, and 4.9-3 would reduce the Draft General Plan’s direct
water quality impacts to less-than-significant levels, and would also reduce the Draft General Plan’s contributions to these cumulative water quality impacts to less than cumulatively considerable. See Section 4.9 for a more detailed explanation.

Cumulative impacts of development under the Draft General Plan and development in cities on groundwater recharge and supplies (Impact 4.9-4) would be significant, and the Draft General Plan’s contribution to this impact would be significant and cumulatively considerable. Implementation of Mitigation Measures 4.9-4a, 4.9-4b, and 4.9-4c would reduce the Draft General Plan’s contribution to this significant cumulative impact, but the incremental contribution would remain cumulatively considerable. No additional feasible mitigation is available to reduce this impact to a less-than-cumulatively considerable level.

Cumulative flood hazards could increase due to increases in impermeable surfaces and alterations to drainages could be caused by regional growth. This cumulative impact would be significant, and the Draft General Plan’s contribution would be cumulatively considerable. Mitigation measures that would be applied to the Draft General Plan (4.9-5a, 4.9-5b, and 4.9-5c) would render the Draft General Plan’s contribution to this impact less than significant and less than cumulatively considerable through minimizing exposure of people and structures to flood hazards, prohibiting development in floodways, and managing stormwater to avoid increases in severity for downstream flooding.

Portions of Amador County are subject to inundation in the unlikely event of the failure of dams on the Mokelumne River, North Fork Mokelumne River, Bear River, and Jackson Creek, creating the potential for levee or dam failure (Impact 4.9-6). However, this cumulative impact would be less than significant as these dams (Pardee, Salt Springs, Lower Bear River, and Jackson Creek dams) were constructed and are maintained in a manner consistent with California Water Code Division 3, which has regulatory jurisdiction over these dams and contains specific requirements for maintenance and operations, emergency work, investigations and studies, repairs, alterations, inspections. Although growth allowed under the Draft General Plan and in the cities could potentially place additional people and property at risk from dam or levee failure, there is no evidence to suggest that dam failure is likely, and implementation of the Draft General Plan would do nothing to increase the risk of dam failure. Therefore, the cumulative impact would be less than significant.

**IMPACT 6-10 Cumulative Land Use and Planning Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

Development that would occur pursuant to the Draft General Plan and the plans of surrounding communities would not result in significant cumulative impacts related to land use. These plans establish a framework for the orderly development of the region, and would not result in land uses or circulation routes that would physically divide existing communities, or conflict with existing plans, policies, or regulations. Therefore, implementation of the Draft General Plan would not contribute to a significant cumulative land use impact.

**IMPACT 6-11 Cumulative Noise Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The Draft General Plan would result in significant impacts related to temporary [construction] noise increases (Impact 4.11-1), and vibration (Impact 4.11-6); however, construction noise from individual projects would be localized and would not result in an additive cumulative effect. Therefore, regional growth would not result in a significant cumulative impact related to temporary construction noise or vibration.

Operational noise from regional growth would primarily occur from motor vehicle traffic (Impacts 4.11-2 and 4.11-3). Future land uses consistent with the Draft General Plan would create new vehicle trips that would result in substantial increases in ambient noise levels near roadways in the unincorporated County, including ambient noise levels above noise standards. Growth in cities that adds vehicle trips to these roadways would contribute to significant cumulative traffic noise impacts. Similar effects would occur along major roadways in the County’s
cities, representing a significant cumulative impact in these locations. Therefore, implementation of the Draft General Plan would result in a significant cumulative impact related to traffic noise, and the Draft General Plan’s contribution to this impact would be cumulatively considerable. Implementation of Mitigation Measure 4.11-2, would reduce the impact, but traffic noise impacts of the Draft General Plan would remain significant and cumulatively considerable. No additional feasible mitigation is available to reduce this impact to a less-than-cumulatively considerable level.

The Draft General Plan would result in significant impacts related to exposure of sensitive receptors to railroad noise (Impact 4.11-4). Growth associated with the Newman Ridge project could increase the number of daily trains by up to 3 trains per day, which could increase the area where sensitive receptors could potentially be affected by railroad noise. Although Mitigation Measures 4.11-2 and 4.11-4 would reduce the impact, this cumulative impact would be significant, and the General Plan’s contribution would be considerable. This cumulative impact would be significant, and the Draft General Plan’s contribution would be considerable. No additional feasible mitigation is available to reduce this impact to a less-than-cumulatively considerable level.

The Draft General Plan would result in significant impacts related to exposure of sensitive receptors to area-source noise levels (Impact 4.11-5); however, effects on sensitive receptors from individual projects would affect local areas, rather than resulting in an additive cumulative effect. Therefore, regional growth would not result in a cumulative impact related to noise exposure from these sources for sensitive receptors.

Similarly, impacts to new development from airport noise (Impact 4.11-6) or mining vibration (Impact 4.11-7) are localized impacts, so regional growth would not combine with Draft General Plan growth to cause significant cumulative airport noise or mining vibration impacts.

**IMPACT 6-12 Cumulative Population, Employment, and Housing Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The Draft General Plan and the plans of surrounding communities establish a framework for the orderly development of the region, and would not result in land uses or circulation routes that would require construction of replacement housing elsewhere (Impact 4.12-2). This cumulative impact would be less than significant.

Although these plans provide a mechanism for accommodating the growth forecast for the region and for individual jurisdictions, implementation of these plans would result in substantial population growth over baseline conditions (Impact 4.12-1), resulting in a significant cumulative impact to which the Draft General Plan would contribute a cumulatively considerable contribution. No feasible mitigation is available that would render the Draft General Plan’s incremental contribution to population growth to less than cumulatively considerable.

**IMPACT 6-13 Cumulative Public Services and Utilities Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The focus on the cumulative impact analysis for public services and facilities is whether implementation of Draft General Plan, in combination with the impacts of other city general plans and plans of other public agencies in Amador County, could create a significant cumulative impact due to the need for the construction of additional facilities to serve the population and businesses of Amador County.

Water supply and wastewater service providers serving the unincorporated areas of Amador County also serve incorporated cities. The Amador Water Agency (AWA) provides either raw or treated water to the County’s cities, and the Sutter Creek wastewater treatment facility serves both incorporated and unincorporated areas. Although some water providers (the Central Amador Water Project [CAWP] and the Jackson Valley Irrigation District [JVID]) and some wastewater systems (Pine Grove, Buckhorn, and several smaller systems) serve only the unincorporated area, cumulative impacts related to water supply, water conveyance, and wastewater service would be similar to project specific impacts described in the analysis in Chapter 4.13, “Public Services and
Utilities” (Impacts 4.13-1 through 4.13-3). These cumulative impacts would be significant, and the Draft General Plan’s contribution to these impacts would be cumulatively considerable. Mitigation Measures 4.13-1a, 4.13-1b, and 4.13-1c would reduce the Draft General Plan’s contribution to cumulative water and wastewater impacts, but the impacts would remain significant and cumulatively considerable. No additional feasible mitigation is available to reduce water supply and wastewater impacts to a less-than-cumulatively considerable level.

The analysis in Section 4.13, “Public Services and Utilities,” demonstrates that Kiefer Landfill has ample capacity to accommodate cumulative solid waste generation (Impact 4.13-4) from city growth as well as from Draft General Plan growth. Therefore, the cumulative impact on solid waste disposal facilities would be less than significant.

The geographic scope of cumulative public services impacts (Impacts 4.13-5 through 4.13-8) is generally limited to the boundaries of the affected service provider. Future regional growth would result in increased demand for police protection, fire protection, schools, and recreation within these boundaries throughout the region.

Regional growth could add to the Draft General Plan’s significant impacts on fire and law enforcement services (Impacts 4.13-5 and 4.13-6), creating significant cumulative impacts to which the Draft General Plan’s contributions would be cumulatively considerable. Implementation of Mitigation Measures 4.13-5a, 4.13-5b, 4.13-5c, and 4.13-5d would render these contributions less than significant and less than cumulatively considerable. New or expanded facilities will be subject to CEQA review and mitigation to reduce both project-specific and cumulatively considerable impacts. See Section 4.13 for further explanations.

The Draft General Plan’s impacts on schools and recreation (Impacts 4.13-7 and 4.13-8) are less than significant, and regional growth would not contribute to significant cumulative school or recreation impacts. School district and recreation providers must continue to evaluate the levels of service desired and the funding sources available to meet increases in demand. Funding and implementation of these services will generally be ensured by concurrency requirements, assessment district requirements, and development impact fees. School enrollment trends have been stable or declining, and school facilities to accommodate regional growth could be accommodated at existing school sites. Because school districts and recreation providers are generally planning for projected regional growth, with expanded facilities funded through impact fees, cumulative impacts related to construction of new school or recreation facilities would not be significant. New or expanded facilities will be subject to CEQA review and mitigation to reduce project-specific impacts.

The Draft General Plan’s impact related to stormwater drainage facilities would be significant, and would contribute to significant cumulative impacts related to the need for new stormwater drainage facilities. Implementing Mitigation Measures 4.13-9a and 4.13-9b would render the Draft General Plan’s contribution to this significant cumulative impact to less than significant and less than cumulatively considerable.

IMPACT 6-14 **Cumulative Transportation Impacts.** Development and land use changes consistent with the Draft General Plan would contribute to significant cumulative impacts.

The traffic analysis included in this EIR addresses cumulative impacts to the regional transportation system (state highways and county roads). A regional traffic model was used to analyze impacts of the Draft General Plan development, together with projected regional growth. The regional traffic model already assumes a level of growth for other nearby jurisdictions based on plans and population/employment projections. Impacts 4.14-1 and 4.14-2 are considered cumulative by nature because anticipated land use forecasts for other areas are included in the traffic model.

For example the increase in traffic levels on certain state highway and local roadway segments would result in unacceptable LOS and would be a significant cumulative impact (Impacts 4.14-1 and 4.14-2), to which the Draft General Plan’s contribution is cumulatively considerable. Mitigation Measures 4.14-1a through 4.14-1c for state
highways and 4.14-2 for local roadways would not render this impact less than significant or less than cumulatively considerable. See Section 4.14 for further explanations.

No other transportation impacts associated with the Draft General Plan were found to be significant, and regional growth would not add to these impacts to create significant cumulative impacts. Impacts related to air traffic patterns and design hazards (Impacts 4.14-3 and 4.14-4) are localized, so growth in cities would not result in additive cumulative impacts. Conflicts by other jurisdictions with adopted policies, plans, or programs for alternative transportation (Impact 4.14-5) would not have an additive effect when combined with County actions under the Draft General Plan, so there would be no significant cumulative impact.

6.2 GROWTH-INDUCING EFFECTS

Section 15126 of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could directly or indirectly foster economic or population growth, or the construction of additional housing. Direct growth-inducing impacts are generally associated with the provision of urban services and the extension of infrastructure to an undeveloped area. The extension of services and facilities to an individual site can reduce development constraints for other nearby areas and can serve to induce further development in the vicinity. Indirect or secondary growth-inducing impacts consist of growth induced in the region by the additional demands for housing, employment, and goods and services associated with population increase caused by, or attracted to, new development.

The purpose of a general plan is to guide growth and development in a community. Accordingly, the Draft General Plan is premised on a certain amount of growth taking place, as forecast by the Department of Finance. The focus of the Draft General Plan, then, is to provide a framework in which the growth can be managed and to tailor it to suit the needs of the community and surrounding area. Implementation of the Draft General Plan would result in a more cohesive community, bring new employment opportunities to the planning area, and foster a stable economic base. The Draft General Plan provides the necessary tools to accommodate future growth, provides direction for new development and reuse projects, and establishes the desired mix and relationship between land use types.

The Draft General Plan anticipates that growth will occur in the region and supports a regional land use pattern that enables orderly growth. The Draft General Plan also contains policies that address the provision of sufficient services and infrastructure as growth occurs and to accommodate projected growth. Because it facilitates orderly growth, implementation of the Draft General Plan would induce growth in the planning area.

6.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126(cf) of the CEQA Guidelines requires that an EIR describe any significant irreversible environmental changes that would be involved in the proposed action should it be implemented. Development in accordance with the Draft General Plan would result in the consumption of nonrenewable resources. This use would have an irreversible effect on such resources. Resources anticipated to be irreversibly committed over the life of the General Plan include, but are not limited to, lumber and other related forest products; sand, gravel, and concrete; petrochemicals; construction materials; steel, copper, lead, and other metals; and water. Future land uses consistent with the Draft General Plan represent a long-term commitment to the consumption of fossil fuel oil and natural gas. These increased energy demands relate to construction, lighting, heating and cooling of residences and buildings, and transportation to and from the planning area. The commitment of resources would be a long-term obligation because once land is developed such land uses have historically not reverted to a less urban use or open space.
6.4 **SIGNIFICANT AND UNAVOIDABLE EFFECTS**

This section lists significant environmental impacts, including impacts that are mitigated but would not be reduced to a less-than-significant level, thereby providing a quick reference by CEQA topic for those impacts found to be significant and unavoidable (Table 6-3).

<table>
<thead>
<tr>
<th>Issue Area</th>
<th>Geographic Area</th>
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</thead>
</table>
| Aesthetic Resources | 4.1-1 Effect on Scenic Vistas  
4.1-3 Degradation of Visual Character  
4.1-4 Increase in Light and Glare and Skyglow Effects |
| Agricultural and Forest Resources | 4.2-1 Conversion of Farmland  
4.2-3 Land Use Conflicts with Existing Agricultural Uses  
4.2-5 Result in Conversion of Forestland to Non-Forest Use |
| Air Quality | 4.3-1 Construction-Related Emissions  
4.3-2 Generation of Long-Term Operational (Regional) Emissions of ROG, NOX, PM10, and PM2.5  
4.3-4 Exposure of Sensitive Receptors to Short- and Long-Term Emissions of Toxic Air Contaminants  
4.3-6 Exposure of Sensitive Receptors to Odors |
| Biological Resources | 4.4-1 Adverse effect on special-status species  
4.4-3 Substantial adverse effect on Ione chaparral, a sensitive natural community |
| Cultural Resources | None 4.5-1 Destruction of or Damage to Known Cultural Resources |
| Geology, Soils, Minerals, and Paleontological Resources | None |
| Greenhouse Gas Emissions | 4.7-1 Generation of GHG Emissions  
4.7-2 Conflict with a GHG Reduction Plan |
| Hazards and Hazardous Materials | 4.8-7 Exposure of Structures to Urban and Wildland Fire. |
| Hydrology and Water Quality | 4.9-4 Interference with Groundwater Recharge or Substantial Depletion of Groundwater Supplies |
| Land Use and Planning | None |
| Noise | 4.11-1 Expose Noise Sensitive Receptors to Construction Noise Levels  
4.11-2 Long-term Generation of Traffic Noise  
4.11-3 Expose Noise Sensitive Receptors to Railroad Noise Levels Exceeding Amador County Standards |
| Population, Employment, and Housing | 4.12-1 Permanent Increase in Population Growth |
| Public Services and Utilities | 4.13-1 Increased Demand for Water Supplies  
4.13-2 Increased Demand for Water Conveyance and Treatment Facilities  
4.13-3 Increased Demand for Wastewater Collection, Conveyance, and Treatment Facilities |
### Table 6-3
List of Impacts Found to Be Significant and Unavoidable

<table>
<thead>
<tr>
<th>Issue Area</th>
<th>Geographic Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation</td>
<td>4.14-1  Increase in Traffic Levels on State Highways Resulting in Unacceptable LOS</td>
</tr>
<tr>
<td></td>
<td>4.14-2  Increase in Traffic Levels on Local Roadways Resulting in Unacceptable LOS</td>
</tr>
<tr>
<td>Cumulative Impacts</td>
<td>6-1     Cumulative Aesthetic Resources Impacts</td>
</tr>
<tr>
<td></td>
<td>6-2     Cumulative Agricultural and Forest Resources Impacts</td>
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<td>6-3     Cumulative Air Quality Impacts</td>
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<td>6-4     Cumulative Biological Resources Impacts</td>
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<td>6-7     Cumulative Greenhouse Gas Emissions Impacts</td>
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<td>6-14    Cumulative Transportation Impacts</td>
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</tbody>
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