
4.0 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS AND ASSUMPTIONS USED

The following is an introduction to the environmental analysis of the project-specific as well as the cumulative impacts resulting from implementation of the proposed City of Ione General Plan update and its associated project components ("project"; "proposed project"). This introduction describes the general assumptions used in the analysis. The reader is referred to the individual technical sections of the Draft EIR ("Draft EIR"; "DEIR"), Sections 4.1 to 4.13, regarding the specific assumptions and methodologies used in the analysis for that particular technical subject.

4.0.1 ANALYSIS ASSUMPTIONS GENERALLY USED TO EVALUATE THE IMPACTS OF THE CITY OF IONE GENERAL PLAN UPDATE

BASELINE ENVIRONMENTAL CONDITIONS ASSUMED IN THE DRAFT EIR (DEIR)

Section 15125(a) of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR include a description of the physical environmental conditions in the vicinity of a project, as they exist at the time the Notice of Preparation (NOP) is published. The State CEQA Guidelines also specify that this description of the physical environmental conditions should serve as the baseline physical conditions by which a lead agency determines whether the impacts of a project are considered significant.

The environmental setting conditions of the City of Ione (City) and its surrounding area are described in detail in the individual technical sections of the DEIR (see Sections 4.1 through 4.13). In general, these sections describe the setting conditions of the city and the surrounding area, as they generally existed when the NOP for the project was released on January 16, 2009.

Table 4.0-1 presents the status of large-scale development projects in the proposed update to the General Plan Planning Area (Planning Area), as well as large-scale development in Amador County (County), including other incorporated cities within the county. These projects are assumed under cumulative conditions.

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**TABLE 4.0-1
PROPOSED AND RECENTLY APPROVED LARGE-SCALE RESIDENTIAL AND COMMERCIAL PROJECTS
IN THE PLANNING AREA AND SURROUNDING REGION**

Project	Location	City/County	Project Description	Total Acres	Residential Units (net new)	Non-Residential Acres or Square Feet (sf)	Status
Castle Ridge	401 Waterman Road	lone	TSM to create 65 SFR lots	8.6	65	N/A	On Hold
Castle Oaks, Villages 3-10	Castle Oaks Subdivision, south of SR 104 across from Mule Creek Prison	lone	SFR subdivision	-	475	N/A	Approved; Village 3 improvements accepted
Castle Oaks, Retail	Castle Oaks Subdivision, south of SR 104 across from Mule Creek Prison	lone	Identified for retail development under the Planned Development approval (i.e., zoned for retail); potential for 100,000 sf of use	10	N/A	10 acres	Subdivision of lot approved; no site plan submitted
Castle Oaks, Hotel	Castle Oaks Subdivision, south of SR 104 across from Mule Creek Prison	lone	Identified for hotel development under the Planned Development approval (i.e., zoned for hotel); approved for 80 rooms	-	N/A	n/a – 80 room hotel	Subdivision of lot approved; no site plan submitted
lone 20 / Gold Village	Foothill Boulevard and SR 104, south side of 104	lone	Retail and residential development	20	49 SFR units, 100 MFR units	10.1 acres	On Hold
St. Andrews Place	South side of Castle Oaks, east of golf course, west of Edgebrook, north of Sutter Creek, APN 005-032-380	lone	Condo development	2.76	25	N/A	On Hold
Wildflower	Between SR 104 and Brickyard Road, just east of Howard Park	lone	SFR development	85.37	277	N/A	Approved; construction on hold
St. Patrick's Park	City of Jackson	Jackson	Mixed Use	58	140	Some neighborhood retail and a church facility	On Hold

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Project	Location	City/County	Project Description	Total Acres	Residential Units (net new)	Non-Residential Acres or Square Feet (sf)	Status
Gold Rush Ranch	612 acres located within the City of Sutter Creek and the western 333 acres located within unincorporated Amador County	Sutter Creek/ Amador County	Specific Plan with mixed uses including golf course and resort, residential uses, commercial uses, and park/open space	945	1,775	57,000 sf commercial and a 60-room hotel	Planning Commission DEIR Review
Golden Hills Estates 1-4	Between Gopher Flat Road (Shake Ridge Road) on the north and Sutter Creek (Volcano) Road on the south (about 0.9 miles east of SR 49)	Sutter Creek	SFR development	159	90	N/A	Phase 1 Complete and Phases 2-4 Approved
Powder House Estates	South of Shake Ridge Road, east of Cole Street	Sutter Creek	SFR and MFR development	20.1	108	N/A	Approved
Gold Country Plaza	Northwest corner of the SR 49/SR 104 (Lower Ridge Road) intersection in the Sutter Hill area	Sutter Creek	Commercial development	-	N/A	139,430 sf commercial	Walgreens Site Plan Approved
Ridge Business Park	Southwest quadrant of SR 104 (Ridge Road)/Forest Products Road intersection	Sutter Creek	Business Park	7.98	N/A	7.98 acres	Approved and partially built
Sutter Hill Transit	Off State Routes 49 and 104, and near State Route 88	Sutter Creek	Regional transit center - 100+ passenger vehicle parking spaces, a bus transfer facility with enclosed Transit Center, and an administrative office/ telecommute center	4.5	N/A	4.5 acres	Site Plan/ Elevations and Being Submitted for Approval
TPDDG Jackson Assoc.	On the south side of Ridge Road at the end of the county airport runway, just east of the	Sutter Creek	Annexation	15.4	N/A	N/A	Currently being annexed into City

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Project	Location	City/County	Project Description	Total Acres	Residential Units (net new)	Non-Residential Acres or Square Feet (sf)	Status
	city of Sutter Creek						
Zinfandel	West of the City of Plymouth, south of Old Sacramento Road, outside of current SOI	Plymouth	Zinfandel Development LLC proposes a Sphere of Influence Amendment, a General Plan Amendment, Rezoning, Vesting Tentative Subdivision Map and annexation of five parcels comprising the Project Site.	364.71	350 SFR	A total of approximately 12 acres of parkland and approximately 142 acres of open space will be dedicated to the City of Plymouth as part of this proposed project. In addition to the parkland, a natural trail network of approximately 6.5 miles will weave through the interconnected open spaces and parks.	The Zinfandel application has been deemed complete by the City and is currently undergoing environmental review. An EIR is currently in the process of being drafted and will be completed following an analysis of cumulative impacts.
Arroyo Woods	West of the City of Plymouth, outside of current SOI	Plymouth	Shenandoah Ridge LLC proposes a Sphere of Influence Amendment, a General Plan Amendment, Rezoning, Vesting Tentative Subdivision Map and annexation of one parcel comprising the Project site.	101	104 SFR Lots	Non-residential acres to be included as part of this project are not currently available.	The applicant is currently in the process of revising his project due to the results of some environmental studies. Environmental analysis of the new map will begin within the next couple of months, as soon as the new map is formally submitted.
Cottage Knoll	NE of City of Plymouth	Plymouth	Cottage Knoll LLC proposes a Sphere of Influence Amendment, a General Plan Amendment, Rezoning, Vesting Tentative Subdivision Map and annexation of one parcel comprising the Project site.	82	302 Cottages	A total of approximately 19.05 acres of open space will be dedicated to the City of Plymouth as part of this proposed project. In addition to the parkland, a pedestrian/ equestrian trail network will	The NOP was distributed on December 17, 2008, with the review period ending on January 19, 2009. A scoping meeting was held on January 12, 2009.

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Project	Location	City/County	Project Description	Total Acres	Residential Units (net new)	Non-Residential Acres or Square Feet (sf)	Status
						connect the open spaces.	
Shenandoah Springs	NW corner of city limits of Plymouth	Plymouth	The Shenandoah Springs LLC proposes a Vesting Tentative Subdivision Map for a 1-parcel Project site within the city limits.	23.78	64	A total of approximately 3.3 acres of parkland and open space will be dedicated to the City of Plymouth as part of this proposed project.	A mitigated negative declaration has been prepared and circulated for this project. Comments have been received and addressed. A mitigation monitoring plan has been drafted for the project.
Shenandoah Ridge	NW of Shenandoah Springs	Plymouth	Shenandoah Ridge LLC proposes a Sphere of Influence Amendment, a General Plan Amendment, Rezoning, Vesting Tentative Map and annexation of one parcel comprising the Project site.	148.33	136 SFR	A total of approximately 1 acre of parkland and approximately 30 acres of open space will be dedicated to the City of Plymouth as part of this proposed Project. In addition to the parkland, a natural trail network of approximately 2 miles will weave through the interconnected open spaces and the park.	The Shenandoah Ridge application has been deemed complete by the City and is currently undergoing environmental review. An EIR is currently in the process of being drafted and will be completed following an analysis of cumulative impacts.

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Project	Location	City/County	Project Description	Total Acres	Residential Units (net new)	Non-Residential Acres or Square Feet (sf)	Status
Oak Glen	NE corner of city limits of Plymouth	Plymouth	The Oak Glen Project proposes a Vesting Tentative Subdivision Map for a 1-parcel Project site within the city limits.	12.26	47 SFR homes in either one or two story configurations	A total of 1.2 acres of open space will be dedicated to the City of Plymouth as part of this proposed project.	The City has recently completed its review of the Project, deeming it complete. Environmental analysis of the project is the next step for the Oak Glen Project.
Shenandoah Valley Community Center	Within city limits of Plymouth	Plymouth	The Commercial Development Solutions LLC proposes a Site Plan Review, Design Review, and a Vesting Tentative Subdivision Map for a 1-parcel Project site within the city limits.	17.62	N/A	The project consists of 31 commercial units (142 EDUs) on a 17.62 acre project site.	The City has recently completed its review of the Project, deeming it complete. Environmental analysis of the project is the next step for the Shenandoah Valley Commercial Center Project. However, the project is currently on hold due to funding shortages.
Fairway Vista II (Formerly Cambra Pines)	APN 033-010-012 Buckhorn Area	Amador County	Mixed Use Residential	30.57	69	-	Application on hold - not yet accepted as complete
Wicklow Subdivision	APN 044-100-027 Martell Area	Amador County	Mixed Use- SFR, MFR, and Commercial	201	750 ₊	26 acres	EIR certified
Pine Acres North	APN(s) 038-170-014; 038-180-040; -042; -054 Pine Grove	Amador County	Mixed Use- SFR, MFR	44.2	106	-	NOP/Initial Study comment period closed 01/05/09

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Project	Location	City/County	Project Description	Total Acres	Residential Units (net new)	Non-Residential Acres or Square Feet (sf)	Status
Golden Vale	APN(s) 011-140-034; -037; & 011-170-017 Martell Area	Amador County	Mixed Use- SFR, MFR, and Commercial	383	607	-	Project revisions in process
East Ridge Business Park	APN(s) 044-020-036; -037 Sutter Creek Area	Amador County	Commercial	9.7	N/A	9.7 acres; 6 commercial units	Variance Request Approved 01/27/2009
Silver Pointe (previously TSM #17)	APN 033-800-021 Buckhorn Area	Amador County	SFR	148.95	29	N/A	Tentative Approval 10/09/2007
The Pines at Mace Meadows	APN(s) 033-480-046; -047 Buckhorn Area	Amador County	SFR	4.09	13	N/A	Tentative Approval 10/14/2003
Thunder Mountain Lodge	APN 026-270-022 Kirkwood	Amador County	Condos	2.22	67	N/A	Tentative Approval 05/23/2006
Palisades Unit 6	APN(s) 026-270-040; -041 (portions of) Kirkwood	Amador County	SFR	8.1	21	N/A	Tentative Approval 11/08/2005
Petersen Ranch	APN 038-010-134 Pine Grove Area	Amador County	SFR	141.22	58	N/A	Phase 1 and Phase 2 recorded
Pine Grove Bluffs	APN(s) 030-080-109 thru -112 Pine Grove Area	Amador County	SFR	32	28	N/A	Tentative Approval 03/08/2008
Quail Ridge	APN 031-010-116 Pioneer Area	Amador County	SFR	82	81	N/A	Tentative Approval 07/15/2003

Note: SFR = Single-Family Residential

MFR = Multi-Family Residential

sf = square feet

* It should be noted that Amador City has no large-scale residential or non-residential projects that have been recently approved or proposed. Confirmed via email from Joyce Davidson, City Clerk, Amador City on February 9, 2009.

Source: Subdivision Map List provided February 5, 2009, by Heather Anderson, Planner II, Amador County Planning Department. City of Ione, 2009. Project List for Sutter Creek City Limits and SOI provided on February 20, 2009 by Mary Van Vooris. City of Plymouth Project List provided by Jonathan Camp on February 12, 2009. Peters, Susan, Email Communication on March 6, 2009.

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GENERAL PLAN CAPACITY ASSUMPTIONS

Future growth in the General Plan Planning Area is guided by the land uses identified in the General Plan Land Use Map (see **Figure 3.0-4**). The DEIR impact analysis (both temporary [i.e., construction-related] and operational effects) is based on these proposed land use patterns, including proposed transportation improvements identified in the proposed Circulation Diagram. The DEIR also evaluates the indirect environmental effects of construction and operation of the land uses and transportation improvements that may take place under the proposed General Plan update and its associated project components. **Table 3.0-1** identifies the land use acreages that currently exist within the city, the current Sphere of Influence (SOI), and the Policy Areas that make up the remainder of the Planning Area. **Table 3.0-2** shows land use acreages that are being proposed under the project.

The noise, water supply, and public service sections of this DEIR analyze impacts from growth to the year 2030 only. This differs from the total buildout of all of the growth designated by the General Plan Land Use Map including substantial growth predicted to occur well after 2030.

Section 5.0 of this Draft EIR, Cumulative Impacts Summary, analyzes climate change impacts resulting from greenhouse gas emissions through buildout. The traffic model developed for this EIR quantifies impacts from growth to 2030 only, but qualitatively analyzes impacts beyond 2030 through buildout. The air quality model developed for this EIR calculates mobile source emissions to 2030, in line with the traffic model, but calculates stationary source greenhouse gas emissions beyond 2030 through buildout.

Some sections analyze the Year 2030 Condition only because beyond that time horizon the City's growth patterns are more speculative and subject to change, rendering these analyses less accurate if they are based on growth projected post 2030. Other impact analyses completed as part of this EIR, such as biology, agriculture, portions of air quality as discussed above, and climate change, are based on impacts resulting from General Plan buildout rather than the Year 2030 Condition because their impacts are either based on ground disturbance associated with the proposed land use patterns and types or because a buildout analysis is required under state guidelines.

It should be noted that the amount of development expected to actually occur by 2030 will likely be less than the 2030 growth projections used in this EIR. The General Plan capacity, or 2030 capacity, is expressed as the total number of people that would be accommodated within the City's Planning Area if the land within that area were developed to the maximum potential allowed by land use designations in the updated General Plan. The land use designations identified on the updated General Plan Land Use Map have the potential to support a population of 18,182 persons and 7,475 housing units (6,038 single-family units and 1,437 multi-family units) by the year 2030. These housing unit projections are based on the proposed land use designations that allow for residential development and the maximum density permitted within each designation. This number was adjusted to account for existing residential units which have been developed at lower densities and for areas that cannot be developed due to steep slopes and other limiting factors. According to the city's occupancy rates of 2.64 persons per household for single-family units and 1.56 persons per household for multiple-family units, the city's population would, as a result, increase to about 18,182 persons.

The Draft EIR analysis is based on 2030 capacity projections. Subsequent requests for increases in development potential beyond what is set forth in the General Plan would require approval of an amendment to the General Plan and are outside the scope of the analysis of this EIR.

STRUCTURE OF THE ENVIRONMENTAL IMPACT ANALYSIS

Sections 4.1 through 4.13 of this DEIR contain a detailed description of current setting conditions (including applicable regulatory setting), an evaluation of the direct and indirect environmental effects resulting from the implementation of the proposed General Plan update, identification of proposed General Plan policies and actions items that mitigate the environmental effect, additional feasible mitigation measures, identification of whether significant environmental effects of the General Plan update would remain after application of proposed policies and action items, and feasible mitigation measures. The individual technical sections of the DEIR follow the following format:

Existing Setting

This subsection includes a description of the physical setting conditions associated with the technical area of discussion, consistent with State CEQA Guidelines Section 15125. As previously identified above, the existing setting is based on conditions as they existed when the NOP for the project was released on January 16, 2009.

Regulatory Framework

This subsection consists of the identification of applicable federal, state, regional, and local plans, policies, laws, and regulations that apply to the technical area of discussion.

Impacts and Mitigation Measures

The Impacts and Mitigation Measures subsection identifies direct and indirect environmental effects associated with implementation of the proposed General Plan update (includes changes to the land use map, an amendment to the City's Sphere of Influence and annexation of three parcels, updates to the City's Zoning Code, and the West Lone Roadway Improvement Strategy) and identifies those proposed updated General Plan policies and action items that mitigate the environmental effect, as well as any of the existing General Plan policies and action items or other regulations and ordinances that do the same. Standards of significance are identified and utilized to determine whether identified environmental effects are considered "potentially significant" or "significant" and require the application of mitigation measures. Each environmental impact analysis is identified numerically (e.g., Impact 4.1.1 – Division of Established Communities).

Mitigation measures were developed through a thorough review of the environmental effects of the updated General Plan by consultants with technical expertise as well as by environmental and engineering professionals. After identification of proposed General Plan policies and action items that mitigate the environmental impact being discussed, any additional feasible mitigation measures that could minimize significant adverse impacts are discussed, after which the impact discussion notes whether the impact has been mitigated to a less than significant level or remains significant and unavoidable.

Cumulative Setting, Impacts, and Mitigation Measures

This subsection is an analysis of the proposed General Plan's contribution to cumulative impacts to the environment. The analysis focuses on whether the General Plan update's contribution is "cumulatively considerable" (State CEQA Guidelines Section 15130). A cumulative impact occurs from the change in the environment that results from the incremental impact of the

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project when added to other closely related past, present, and reasonably foreseeable 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)). Accordingly, the cumulative setting includes related past, present, and reasonably foreseeable projects.

DEFINITION OF CUMULATIVE SETTING

State CEQA Guidelines Section 15130 requires that EIRs include an analysis of the cumulative impacts of a project when the project's effect is considered cumulatively considerable. In general, the cumulative setting conditions considered in this Draft EIR are based on:

- **Local Adopted General Plans.** The existing land use plans in the Amador region, including those of Amador County and the cities of Jackson, Sutter Creek, Plymouth, and Amador City.
- **Large-Scale Development Projects.** Consideration of large-scale proposed and approved development projects listed in **Table 4.0-1**. This list of projects is intended to describe large-scale proposed, approved, and reasonably foreseeable future development activities in Amador County that, when considered with the proposed General Plan, have the potential to have cumulatively considerable impacts. It is not intended to be an all-inclusive list of projects in the Amador region.
- **Effect of Regional Conditions.** Consideration of background traffic volumes and patterns on state highways (e.g., SR 104, SR 124, SR 16, SR 49, and SR 88), background air quality conditions, and other associated environmental conditions that occur within the Amador region, both within and outside of the Planning Area.
- **Consideration of Existing Development Patterns.** Consideration of the current environmental conditions of existing development and past land use activities in the region.

Each technical section of the Draft EIR includes a description of the geographic extent of the cumulative setting based on the characteristics of the environmental issue under consideration as set forth in Section 15130(b) of the State CEQA Guidelines.

Consideration of Cumulative Impacts

Each technical section in the DEIR considers whether the project's effect on anticipated cumulative setting conditions is cumulatively considerable (i.e., a significant effect). "Cumulatively considerable" means that the incremental effects of an individual project are significant, under cumulative conditions, when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects [CEQA Guidelines, Section 15065(a)(3)]. The determination of whether the project's impact on cumulative conditions is considerable is based on a number of factors, including consideration of applicable public agency standards, consultation with public agencies, and expert opinion. The environmental effects of potential development of the City's Planning Area are incorporated in the cumulative impact analysis. Section 5.0, Cumulative Impacts, provides a summary of the cumulative impacts associated with the project.

INFORMATION UTILIZED IN THIS EIR

This DEIR utilizes technical information and analyses from previously certified EIRs that are relevant to the consideration of environmental effects of the proposed General Plan update, which is supported by the State CEQA Guidelines (see Sections 15148 [Citation] and 15150 [Incorporation by Reference]). In addition to materials cited, the following EIRs have been utilized in this Draft EIR:

- City of Lone General Plan and Environmental Impact Report (1982)

By utilizing these provisions of the State CEQA Guidelines, the City, in preparing this Draft EIR, has been able to make maximum feasible and appropriate use of the technical information in these EIRs. These EIRs and other referenced materials are available for review upon request at the City of Lone City Hall located at 1 East Main Street, Lone, CA 95640.

TERMINOLOGY USED IN THE DRAFT EIR

This DEIR uses the following terminology:

Cumulatively Considerable Impact: A cumulatively considerable impact would result when the incremental effects of a project are significant when considering past projects, approved projects, and probably future projects (City of Lone, 2008/2009).

Future Growth Area: Future growth areas (FGA) are potential areas of new growth. An area identified as a Future Growth Area has the potential for future development after the majority of existing land designated in the General Plan for residential use has been developed or entitled. The City may accept an application for development of a FGA before this point if development of the FGA creates a significant public benefit for Lone that could not be secured through development of other property within the city or the City's adopted Sphere of Influence. The General Plan includes basic policies and a vision for the FGAs, which applications must be consistent with, but will require a General Plan Amendment to fully adopt. These areas require a more specific level of policy direction, such as being comprehensively planned and developed through the use of Specific Plans or Planned Developments. As such, growth in these areas must be approved by the Planning Commission and the City Council.

Less than Cumulatively Considerable Impact: A less than cumulatively considerable impact would result when the project would not contribute considerably to a significant physical impact on the environment expected under cumulative conditions.

Less Than Significant Impact: A less than significant impact would cause no substantial adverse change in the physical condition of the environment. No mitigation is required for project effects found to be less than significant.

Mitigation: Mitigation means avoiding an impact altogether by not taking a certain action or parts of an action; minimizing impacts by limiting the degree or magnitude of the action and its implementation; rectifying an impact by repairing, rehabilitating, or restoring the impacted environment; reducing or eliminating an impact over time by preservation and maintenance operations during the life of the action; or compensating for an impact by replacing or providing substitute resources or environments (City of Lone, 2008/2009).

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Planning Area: The Planning Area is the area directly addressed by the General Plan, including the city limits and land within the City's Sphere of Influence (SOI), plus a larger study area including the unincorporated area extending west to the San Joaquin county line, south beyond State Route (SR) 88, and east beyond the intersection of SR 104 and SR 88.

Policy Areas: The General Plan identifies 10 individual Policy Areas within the General Plan Planning Area with unique characteristics/features that warrant more detailed planning efforts and specific policies. The Policy Areas have been established based on several criteria, including existing, proposed, or approved project boundaries; location within the General Plan Planning Area; ownership; type of existing or proposed land uses; distinctive issues; and geographic or environmental features. Each Policy Area warrants the incorporation of special provisions or consideration as the City of Lone develops.

Potentially Significant Impact: A potentially significant impact would occur when an exact measurement of the project's effect cannot be made but substantial evidence indicates that the impact could exceed standards of significance. A potentially significant impact may also be an impact that may or may not occur and where a definite determination cannot be made. Feasible mitigation measures and/or project alternatives are identified to avoid or reduce the project's effects on the environment to a less than significant level.

Significant and Unavoidable Impact: A significant and unavoidable impact would result in a substantial change in the environment that cannot feasibly be avoided or mitigated to a less than significant level if the project is implemented.

Significant Impact: A significant impact is a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project. In evaluating the significance of the environmental effect of a project, the City considers both direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project (City of Lone, 2008/2009). Significant impacts are identified by the evaluation of project effects using specified standards of significance provided in each technical section of the DEIR. Identified "significant" impacts are those where the project would result in an impact that can be measured or quantified. Mitigation measures and/or project alternatives are identified to avoid or reduce to a less than significant level project effects to the environment.

Thresholds of Significance: A set of significance criteria used by the CEQA lead agency as well as by other public agencies with regulatory jurisdiction over the project to determine at what level or "threshold" an impact would be considered significant. Significance criteria used in this DEIR are derived from the following: the State CEQA Guidelines; the City of Lone Framework for Planning, Entitlement Review, and Development; factual or scientific information; regulatory performance standards of local, state, and federal agencies; and goals, objectives, and policies of the proposed General Plan. Specified significance criteria are identified at the beginning of the impact analyses in each technical section of the DEIR.

REFERENCES

DOCUMENTS

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