6.0 PROJECT ALTERNATIVES

6.1 Introduction

GENERAL CEQA REQUIREMENTS

The purpose of the EIR alternatives analysis is to describe a range of reasonable alternatives to the proposed project that could feasibly obtain most of the basic objectives of the project, and to evaluate the comparative merits of the alternatives (State CEQA Guidelines, Section 15126.6[a]). An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion shall focus on those alternatives that are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6[b]).

CEQA requires an EIR to identify project alternatives and to indicate the manner in which a project's significant effects may be mitigated or avoided. However, it does not mandate that the EIR itself contain an analysis of the feasibility of the various project alternatives or mitigation measures that it identifies (Public Resources Code, Sections 21002.1, subd (a): 21100 and subd (b)4, 2004). As the lead agency, the City of lone bears the responsibility for the decisions that have to be made before the project can go forward. These decisions include but are not limited to the determinations of feasibility and whether the benefits of the project outweigh its significant effects on the environment (Public Resources Code Sections 21002.1, subd (b) and (c); Section 21082).

According to the State CEQA Guidelines, an EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the project. When addressing feasibility, CEQA states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, jurisdictional boundaries, and whether the applicant can reasonably acquire, control or otherwise have access to alternative sites" (State CEQA Guidelines Section 15126.6). The State CEQA Guidelines also specify that the alternatives discussion should not be remote and speculative; however, they need not be presented in the same level of detail as the assessment of the proposed project.

State CEQA Guidelines indicate that several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the proposed project; (2) ability of alternatives to avoid or lessen the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives of the project; and, (4) the feasibility of the alternatives. These factors should be unique for each project.

The significant environmental impacts of the proposed project that the alternatives will seek to eliminate or reduce were determined and based upon the findings contained within each technical section evaluated in Sections 4.1 through 4.13 of this DEIR.

6.2 ALTERNATIVES UNDER CONSIDERATION

PROJECT ALTERNATIVES CONSIDERED

In accordance with the provisions of State CEQA Guidelines Section 15126.6, the following alternatives to the proposed project were evaluated. These alternatives were compared to the proposed project and its significant environmental impacts identified in Sections 4.1 through 4.13.

- Alternative 1 No Project Alternative
- Alternative 2 Reduced Planning Area Alternative
- Alternative 3 Reduced Planning Area with Future Growth Area Alternative
- Alternative 4 West Ione Roadway Improvement Strategy Segments Alternative
- Alternative 5 Q Ranch Alternative

These alternatives constitute an adequate range of reasonable alternatives as required under State CEQA Guidelines Section 15126.6. The environmental effects of each of these alternatives were identified and compared with those environmental impacts resulting from the proposed project, that were identified in environmental issue areas in Section 4.0. **Table 6.0-7** at the end of this section provides a comparison of the environmental benefits and detriments of each alternative.

ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR ANALYSIS

Off-Site Alternative

Off-site alternatives are generally evaluated in an environmental document to avoid, lessen, or eliminate the significant impacts of a project by considering the proposed development in an entirely different location. To be feasible, development of off-site locations must be able to fulfill the project purpose and meet most of the project's basic objectives. Given the nature of the proposed project (updating the city's existing General Plan), it would not be pertinent or possible to consider an off-site alternative as it includes a long-range plans for an existing city that cannot be relocated, and since the city boundaries have been established through incorporation. Further, this alternative would not meet the basic project objectives because consideration of another location would not address issues pertinent to the establishment of land use designations and policies to regulate the orderly development of the city. For this reason, an off-site alternative is considered infeasible pursuant to State CEQA guidelines 15126.6(c) and is being rejected as a feasible project alternative.

6.3 ALTERNATIVE 1 - NO PROJECT ALTERNATIVE

CHARACTERISTICS

CEQA, through case law and statutory language, requires that the "no project" alternatives be evaluated; under Section 15126.6(e)(2), "the No Project Alternative shall discuss the existing conditions at the time the notice of preparation is published...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

The purpose of the No Project alternative is to allow the Lead Agency to compare the impacts of the proposed project with the impacts of not approving it.

According to Section 15126.6(e)(3)(A), "[w]hen the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. In the case of Alternative 1 or the No Project alternative, the proposed project would not be approved and the existing City of lone General Plan would continue as the primary guiding document for growth and development within the city. The existing 1992 General Plan included approximately 3,759.90 acres within the Planning Area (see **Figure 6.0-1)**, with 2,903.68 acres located in the city limits and 856.22 acres within the city's Sphere of Influence (SOI). The 1992 General Plan also estimated that the city would reach 11,758 persons, including the area's prison population, by the year 2010.

COMPARATIVE ANALYSIS

Land Use and Planning

Land Use Incompatibilities (Impact 4.1.2)

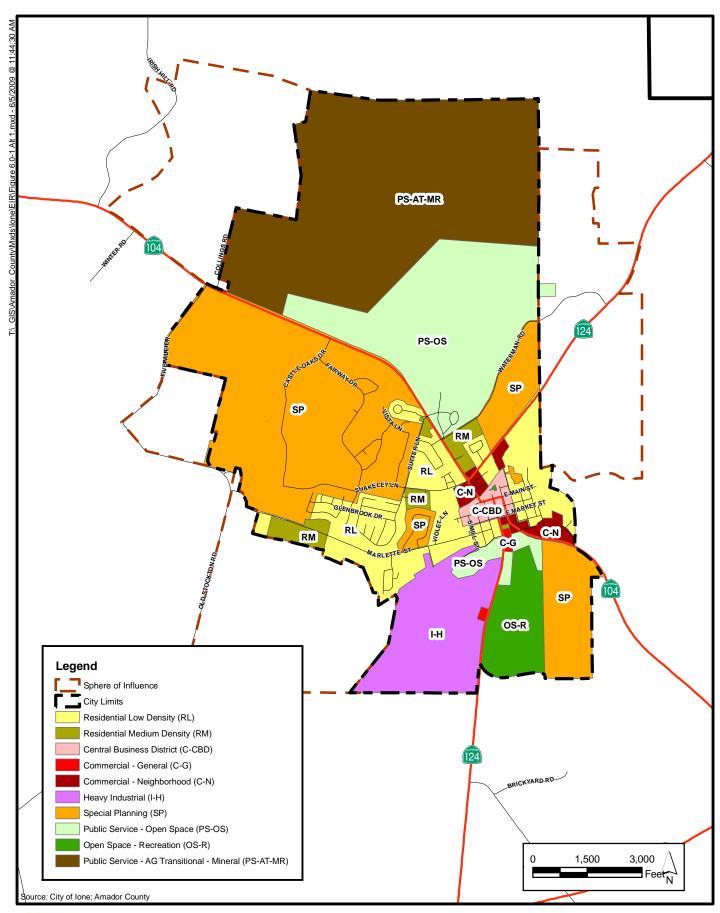
The proposed General Plan Land Use Map was developed with the intent to designate areas for the most appropriate type of land use based on existing land uses, the existing and planned circulation system, the specific needs of lone, environmental constraints, and other factors. Land use designations in the existing city limits are largely unchanged (from the 1982 General Plan Land Use Map). Most of the areas in the city do not have areas of significant potential land use incompatibility. As such, implementation of the proposed Land Use Map would not be expected to result in many significant land use incompatibilities since the proposed GP policies contain language that would assist in mitigating any potential impacts. Areas that could pose potential land use incompatibility include locating residential development such as Castle Oaks and Special Planning Areas (Castle Oaks Gateway, Ringer Ranch, Preston Reuse and 124 Corridor) adjacent to the Mule Creek State Prison and CALFIRE facilities. Therefore this impact is identified as **potentially significant**.

Alternative 1 would result in a **potentially significant** impact, even though the 1992 General Plan Land Use Element contains policy provisions regarding land use compatibility. However, given the size of the Planning Area under this alternative, this impact would be less than that of the proposed project.

Project and Cumulative Consistency Impacts with Relevant Land Use Planning Documents (Impacts 4.1.3 and 4.1.4)

The more intensive land use patterns within the Planning Area under the proposed project would contribute to the environmental effects of growth anticipated to occur in the region in the foreseeable future. The proposed project would increase the existing General Plan Planning Area by approximately 28,009.75 acres and would accommodate a larger population and employment base within the Planning Area through the intensification of development. The proposed project would also designate more land for open space as compared to the existing County General Plan, and the proposed land use pattern and development intensity would substantially contribute to the conversion of land in the region to more urban uses through the designation of currently vacant lands for residential, mixed-use, commercial, and industrial development, and roadway improvement projects including the West Ione Roadway Improvement Strategy (WIRIS). The significant environmental effects of such conversions are discussed and analyzed in greater detail in the various sections of this Draft EIR that relate specifically to those particular issue areas (see Section 4.2 through 4.13). This impact is identified as significant and unavoidable under project and cumulative conditions.

Alternative 1 would retain the current land use designations and would not include the establishment of the same larger Planning Area as the proposed project. Though this alternative would only impact 3,759.90 acres, it would still allow for the intensification of urban development and the impact remains **significant and unavoidable**.



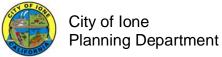


Figure 6.0-1 Alternative 1

Agricultural Resources

Project and Cumulative Loss and Conversion of Agricultural Lands (Impacts 4.2.1 and 4.2.4)

Implementation of the proposed project Land Use Map would designate a total of 293.10 acres of Important Farmland (62.67 acres Prime Farmland + 1.35 acres Unique Farmland + 13.67 acres Farmland of Statewide Importance + 215.41 acres Farmland of Local Importance) within the Planning Area for urban uses. This impact is **significant and unavoidable** under project and cumulative conditions.

Alternative 1 designates 196.67 acres of Important Farmland within the city limits and current SOI for urban uses. Therefore, Alternative 1 would result in the conversion of 96.43 less acres of Important Farmland than the proposed project. Although this impact would still be considered a **significant and unavoidable** impact, the extent of farmland loss would be less than that of the proposed project.

Agricultural/Urban Interface Conflicts (Impact 4.2.2)

Implementation of the proposed project Land Use Map would place urbanized land uses adjacent to agricultural uses and would replace existing agricultural uses. It is anticipated that as the city builds out, new agriculture/urban interface conflicts may occur, particularly in the areas outside the city limits. This impact is identified as **significant and unavoidable**.

Alternative 1 would also result in potential interface conflicts since it also allows for urban development to occur adjacent to agricultural uses. Therefore this impact is **significant and unavoidable**. However, the extent of this impact would be reduced as compared to the proposed project as less farmland would be converted to urban uses.

Agricultural Zoned Lands and Williamson Act Contract Conflicts (Impact 4.2.3)

The Planning Area contains approximately 5,077.47 acres currently under a Williamson Act contract and in non-renewal status. However, none of this land is located within the existing city limits, but is in those portions of the Planning Area that lie outside the city limits. Most of this land is designated to as either General Agriculture (AG) or Open Space (OS), thereby allowing these lands to continue in agricultural operation. However, portions of three parcels within the Triangle Planning Area totaling 91.09 acres would be allowed to develop with various types of urban uses. This potential for development would be in violation of Williamson Act contracts and therefore this impact is considered to be **potentially significant**.

Alternative 1 would not result in the loss of any land under Williamson Act contracts as there are such contracts on any land in the city limits or current SOI. Therefore, the extent of this loss would be better than the proposed project.

Population and Housing

Project and Cumulative Population, Housing and Employment Increases (Impacts 4.3.1 and 4.3.4)

Development under the proposed project and its associated project components would lead to an increase in population and employment. Development and growth in the city, as a result of the implementation of the proposed project, would contribute to cumulative population and housing conditions in the unincorporated areas of Amador County, as well as in surrounding cities and counties. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Alternative 1 would also result in an increase in population and employment that would involve physical effects to the environment resulting in a **significant and unavoidable** impact, but would be less than the proposed project. However, since this alternative would reduce growth potential that would not accommodate future growth in the region, this may result in displacement of this growth into other areas of Amador County and the greater Central Valley region.

Jobs/Housing Balance Impact 4.3.3)

Implementation of the proposed project is anticipated to have the capacity for up to 12,800 jobs and approximately 7,475 housing units. This would result in a jobs-per-housing ratio of 1.7. It is generally considered ideal to have approximately one job per housing unit in a jurisdiction. A ratio of 1.7 therefore indicates that the Planning Area would have substantially more jobs than housing. This could potentially result in attracting substantial numbers of workers from outside the Planning Area, thereby resulting in increases in traffic congestion, air emissions, and mobile-source noise. This impact is considered **significant**.

With a smaller Planning Area and projected population increases, **Alternative 1** has less potential to result in a jobs/housing imbalance. Therefore, **Alternative 1** would result in **less than significant** impacts to the Planning Area's jobs/housing balance.

Transportation and Circulation

Project and Cumulative Roadway Segment and Freeway Impacts (Impacts 4.4.1 and 4.4.5)

Implementation of the proposed project would provide service levels consistent with the city's LOS "D" standard with few exceptions. The proposed project would result in LOS F within the General Plan planning horizon on:

- SR 104 between Sutter Lane and SR 124 North
- SR 104 between SR 124 North and E Main Street
- SR 104 between SR 124 South and Foothills Blvd
- SR 124 between E Main Street and Washington Street
- SR 124 between Washington Street and WIRIS
- SR 124 between WIRIS and Buena Vista Road

With full development of the Planning Area and regional growth in traffic, these impacts are anticipated to worsen. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Though the existing GP policies attempt to maintain a LOS "C" on city roadways, **Alternative 1** would result in less development potential and therefore less potential for significant impacts to the circulation system. Therefore, while impacts under Alternative 1 would be **significant and unavoidable**, these impacts would be less than that of the proposed project. In addition, the level of development and the environmental effects of growth under Alternative 1 have been addressed in the Final EIR for the city's existing General Plan.

Project and Cumulative Transit System Impacts (Impact 4.4.3)

Implementation of the proposed project would result in an increase in the demand for public transit service. While Amador Regional Transit (ARTs) currently provides six in-bound and outbound trips per day to Sutter Hill and Buena Vista/Comanche, the growth of the city may eventually require greater decreased headway, additional busses, or additional bus stops. The growth in the population and employment sector proposed by the General Plan may increase ridership beyond what is available or planned. Therefore, future unmet transit demand in lone is a **potentially significant** impact.

Alternative 1 would also conflict with demand for transit services and would result in similar **significant** impacts. However, these impacts would be less than that of the proposed project and the level of transit services required and its environmental effects under Alternative 1 have been addressed in the Final EIR for the city's existing General Plan.

Air Quality

Project and Cumulative Impacts on Air Attainment Plans (Impacts 4.5.1 and 4.5.6)

Population growth and the development potential under the proposed project could emit non-attainment pollutants within Amador County that could challenge the region's ability to meet ozone and PM standards. **Tables 4.5-5** and **4.5.-6** indicate the levels of emissions from vehicles and electricity and natural gas use, associated with residential heating in the winter, landscaping activities, etc. Since a General Plan's impacts on cumulative air quality in a region is determined by its consistency with applicable attainment plans, and since there is currently no ozone attainment plan for Amador County, this impact is considered **significant and unavoidable** under project and cumulative conditions.

Without an ozone attainment plan for the region, **Alternative 1** too would result in impacts that are **significant and unavoidable**.

Odor Emissions (Impact 4.5.3)

Implementation of the proposed project has the potential to allow for several types of project that could locate sensitive receptors near existing and future sources of objectionable odors. In addition, future construction activities could result in odorous emissions from diesel exhaust associated with construction equipment. Thus, this impact is **potentially significant**.

Implementation of **Alternative 1** would include land uses that may produce odorous emissions or may allow for the construction of sensitive land uses near existing or future sources or odorous emissions. This impact is potentially significant, but could be mitigated similar to the proposed General Plan with the proposed policies and mitigation measures identified in Section 4.5, Air Quality. However, Alternative 1 would result in a reduced population that could be exposed to objectionable odors and therefore this impact would be reduced in comparison to the proposed project.

Expose Sensitive Receptors to Toxic Air Contaminants (TACs) (Impact 4.5.4)

Trenching, grading, and other excavations associated with future development under the proposed project could expose zones of asbestos-containing rock and possibly cause airborne releases of fibrous minerals in areas containing ultramafic rocks or potentially in areas containing undivided Mesozoic volcanic and metavolcanic rocks. Therefore, implementation of the

proposed General Plan Land Use Map could result in releases of, and exposure to, NOA. This is a **significant** impact.

Implementation of **Alternative 1** could expose sensitive receptors to naturally-occurring asbestos (NOA). This impact is significant, but could be mitigated similar to the proposed General Plan with the proposed policies and mitigation measures identified in Section 4.11, Geology and Soils. However, Alternative 1 would still result in reduced development and a reduced population that could be exposed to NOA and therefore this impact would be reduced in comparison to the proposed project.

Construction CO Emissions (Impact 4.5.5)

The General Plan update and its associated project components includes land use designations that would allow for future construction of residential, commercial, industrial, and other projects. This will result in construction-related emissions from future projects that would generally be short-term in duration, but may still cause adverse air quality impacts. Inhalable PM₁₀ is the pollutant of greatest concern associated with construction activities. PM₁₀ emissions can result from construction activities facilitated by the proposed General Plan, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. This is considered a **potentially significant** impact.

Alternative 1 would require development under the existing General Plan to comply with AAPCD requirements. However, it too would allow for increases in construction related activities as the proposed project and would result in the same **potentially significant** impact.

Conflict or Obstruct with Implementation of Greenhouse Gas Reduction Measures (Impacts 4.5.7)

Implementation of the proposed project and its associated project components would increase emissions of CO2e by 2030 over existing (2008) conditions. This increase in GHG emissions is inconsistent with AB 32's goal of reducing 2020 greenhouse gas emissions to 1990 levels. Table 4.5-11 illustrates that most of these increases are likely to come from increases in housing associated with the city's population growth. These increases would increase the carbon footprint of lone in 2030. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions will further contribute to climate change. Also, the projected growth in the City of Ione could contribute to global increases in temperature that could increase exposure of future development to risk related to significant storm events, sea level rise and flooding resulting from global climate change. The proposed project does include a number of policies that would indirectly help mitigate citywide GHG emissions by reducing activities from several key sources of GHGs, including motor vehicles, water conveyance, waste collection, and energy consumption. However, due to the expected increases in GHG emissions resulting from the growth associated with the proposed project, and since the potential extent and severity of any such risk is speculative, given the unknown nature of potential impacts of climate change on lone, this impact would be significant and unavoidable.

Implementation of the "No Project" alternative or land uses proposed under the existing General Plan would have similar emissions of carbon dioxide and other natural gas pollutants. Though these emissions may be less than those considered from development under the proposed General Plan development scenario, contributions to regional increases in greenhouse gases under Alternative 1 are still considered to be **significant and unavoidable**. In addition,

Alternative 1 does not contain any policy provisions that address greenhouse gas emissions or energy reduction measures, would not be consistent with state and local measures to reduce greenhouse gas emissions, and would result in a significant impact. Thus, Alternative 1 would have a greater impact than the proposed project.

Noise

Construction Noise Impacts (Impacts 4.6.1 and 4.6.4)

Implementation of the proposed project could result in activities associated with construction could result in elevated noise levels at noise-sensitive land uses. Increases in ambient noise levels, particularly during the nighttime hours, could result in increased levels of annoyance and potential sleep disruption. This impact would be considered **potentially significant**.

Alternative 1 would result in a similar **potentially significant** impact with construction related noise resulting from new development.

Project and Cumulative Transportation Noise Impacts (Impacts 4.6.2 and 4.6.5)

Projected future noise contours for major roadways within the city and predicted increases in traffic noise levels associated with future development in the Planning Area are summarized in **Table 4.6-7** and depicted in **Figure 4.6-3** (refer to Impact 4.6-2). Buildout of the Planning Area as set forth in the proposed project would result in additional traffic along these roadways and result in increased noise. This impact would be **significant and unavoidable** under project and cumulative conditions.

Implementation of **Alternative 1** would result in similar traffic noise impacts. Though the noise standards under the existing General Plan are similar to those proposed in the General Plan, none of these policy provisions could fully mitigate this impact. This impact would be **significant** and unavoidable under Alternative 1 as well.

Stationary/Non-Transportation Noise Impacts (Impacts 4.6.3)

Implementation of the proposed project policies and actions would reduce noise associated with new stationary noise sources and the placement of new noise-sensitive land uses over which the city has jurisdiction (e.g., commercial and industrial sites, residential uses). However, some stationary noise impacts cannot be mitigated to a less than significant level due to limitations on the city to control the exact placement of substantial noise-generating uses (e.g., school facilities) in proximity to noise-sensitive land uses (e.g., residential). Accordingly, stationary source noise levels from activities on uses for which the city has limited control could result in noise levels that exceed the city's maximum allowable noise standards. Thus, this impact is considered significant and unavoidable.

Alternative 1 would result in similar noise impacts given that the existing General Plan would also allow for future development and associated noise impacts. This impact would also be **significant and unavoidable** for Alternative 1.

Biological Resources

Impacts to Special-Status Species (Impact 4.8.1)

Development under the proposed project could potentially cause direct and indirect impacts to approximately 16,746 acres of vegetation types that as occupied or potential habitat for listed

species. As the final design and extent of future development is not currently known, the acreages listed in **Table 4.8-8** represent the maximum area that could be directly affected. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 1** encompasses 28,009.75 acres less than that of the proposed project, it would have reduced impacts in comparison to the proposed project given that it would result in less land disturbance. However, it should be noted that the proposed project has more effective policy provisions for addressing and mitigating biological resource impacts as compared to the existing General Plan. This impact therefore remains significant.

Impacts to Species of Concern and Other Non-Listed Special-Status Species (Impact 4.8.2)

Suitable habitat exists in the Planning Area for unlisted but nonetheless special-status species. These species are designated as a species of concern by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Game (CDFG), and/or listed in the CNPS's online inventory as List 2. Direct impacts to these species would occur for the same reasons and in the same manner as direct and indirect impacts to listed species as identified and discussed in Impact 4.8.1. **Table 4.8-9** provides information on the acreages of suitable habitat that would be affected by implementation of the proposed project. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 1** encompasses 28,009.75 acres less than that of the proposed project, it would have reduced impacts in comparison to the proposed project given that it would result in less land disturbance. However, it should be noted that the proposed project has more effective policy provisions for addressing and mitigating biological resource impacts as compared to the existing General Plan. This impact therefore remains **significant**.

Impacts to Sensitive Habitats (Impact 4.8.3)

Implementation of the proposed project could result in disturbance, degradation, and removal of up to 147 acres of valley oak woodland, 3,306 acres of blue oak woodland, 322 acres of blue oak foothill pine, and 821 acres of montane hardwood which has a high potential to support vernal pools, a CDFG sensitive habitat. Vernal pools require the surrounding upland habitat to maintain their habitat value and function. Approximately 501.2 acres of wetland and open water habitat would also be in direct conflict with the proposed land use designation (i.e. industrial, residential and other built environment). Implementation of the proposed project could also result in disturbance, degradation, and removal of riparian habitat, and would result in the conversion of farmland that provides habitat to several listed species and impacts are considered significant.

Since **Alternative 1** encompasses 28,009.75 acres less than that of the proposed project, it would have reduced impacts in comparison to the proposed project given that it would result in less land disturbance. However, it should be noted that the proposed project has more effective policy provisions for addressing and mitigating biological resource impacts as compared to the existing General Plan. This impact therefore remains **significant**.

Impacts to Migratory Corridors (Impact 4.8.4)

Implementation of the proposed project would interfere substantially with the movement of several special status and common wildlife species. Wildlife movement corridors are routes frequently utilized by wildlife that provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat. This would be a **significant** impact.

The existing General Plan contains no policy provisions that address wildlife movement and thus could result in greater impacts to movement and migratory corridors as compared to the proposed project. **Alternative 1,** therefore, would have greater impacts than the proposed project.

Cumulative Biological Resource Impacts (Impact 4.8.6)

Implementation of the proposed project could result in the loss of substantial sensitive habitat areas as well as farmland utilized by state and federally listed species that would add to cumulative loss of such habitat. Given the extent of this potential conversion and loss of habitat, this impact is considered **significant and unavoidable**.

Though **Alternative 1** encompasses 28,009.75 acres less than that of the proposed project, and would have reduced impacts in comparison to the proposed project given that it would result in less land disturbance, the cumulative impact would remain **significant and unavoidable**.

Cultural and Paleontological Resources

Project and Cumulative Prehistoric and Historic Resource Impacts (Impacts 4.9.1, 4.9.2, 4.9.4, and 4.9.5)

Cumulative development in the region would result in the loss and/or degradation of cultural resources. These cumulative effects of development on cultural resources would be significant. Since most of the Planning Area, particularly outside the city limits has not been surveyed for cultural resources, there is the potential for future development to uncover previously undiscovered cultural resources because of the area's historic occupation by Native Americans, Spanish, and other groups of settlers. Buildout of the Planning Area could contribute to the cumulative loss of cultural resources in the region. The proposed project contains several policies and action items that would mitigate its contribution to this impact. Thus, this impact is potentially significant under project and cumulative conditions.

The existing General Plan does not include any policies that address historic or prehistoric resources. Therefore, **Alternative 1** would result in greater impacts than the proposed project and have a **potentially significant** impact with regard to historic and prehistoric resources.

Project and Cumulative Paleontological Resource Impacts (Impacts 4.9.3 and 4.9.6)

A search of the University of California, Berkeley Museum of Paleontology collections database identified only one fossilized plant within the boundaries of the city. The sensitivity of the area for paleontological resources, however, has not been assessed on a parcel by parcel basis, and no formal paleontological investigations were identified for the area. Consequently, implementation of the proposed project could impact undiscovered paleontological resources. This impact is **significant** under project and cumulative conditions. However, the proposed

project policies and action items in the Historic and Cultural Resources Element include provisions that would ensure paleontological resources are protected.

The existing General Plan includes no policy provisions that address paleontological resources. Thus, **Alternative 1** would result in greater impacts than the proposed project and a **significant** impact.

Hydrology and Water Quality

Construction, Operation, Groundwater, and Cumulative Water Quality Impacts (Impacts 4.10.1, 4.10.2, and 4.10.3)

Continued compliance with applicable SWRCB statewide water quality permits and the city's Storm Water Quality Management Program would minimize the pollutant load of storm drainage within the Planning Area from development that could be accommodated under the proposed GPU. Implementation of General Plan Update policies would further protect surface and groundwater quality and mitigate the city's contribution to this impact by protecting natural streams and drainages, reducing potential sources of pollutants, and requiring the use of landscaping and other BMPs to prevent pollutants from entering surface and groundwater resources. As such, the city's contribution to cumulative water quality impacts is considered a significant impact under project and cumulative conditions.

Alternative 1 would result in a **significant** impact similar to the proposed project, and would also have to comply with SWRCB statewide water quality permits and the city's Storm Water Quality Management Programs. However, Alternative 1 would disturb less land area than the proposed project and would have less pollutant loads of storm drainage.

Exposure to Flood Hazards (Impact 4.10.4)

The Planning Area is traversed by several creeks for which 100-year floodplains have been mapped by FEMA or the State of California DWR. Some of the 100-year floodplain area mapping within the Planning Area has only been based on approximate method technical evaluations and does not include detailed information such as base flood (100-year) elevations. In these areas, the possibility of exposing structures and facilities to flood hazards and potential damage as a part of new development is considered to be a **potentially significant** impact.

Though **Alternative 1** encompasses a smaller Planning Area, it would result in a similar **potentially significant** impact as the proposed project, specially since the existing General Plan does not contain as extensive flooding policies (including those addressing recent state flood planning requirements under SB 5) as those provided in the proposed project.

Geology and Soils

Slope Instability and Landslides (Impacts 4.11.3)

Implementation of the proposed project, along with potential development in the Planning Area could result in slope instability near the edges of steep slopes and if temporary or permanent cut and/or fill slopes were made during construction. Therefore, implementation of the proposed project could expose new development within the city limits to hazards associated with slope instability and landslides. This is a **potentially significant** impact.

Alternative 1 would result in similar project impacts related to slope instability. Though this alternative would also result in **significant** impacts, the extent of this impact would be reduced as compared to the proposed project since the No Project Alternative encompasses a Planning Area that is 28,009.75 acres less than that under the proposed project.

Project and Cumulative Loss of Mineral Resources (Impacts 4.11.5 and 4.11.8)

Current mining operations within the Planning Area are designated as Surface Mining (SM) and are anticipated to continue with mining operations and the extraction of mineral resources. Encroachment of urban uses in adjacent areas could result in conflicts with these mining operations and impacts could be potentially significant. This impact is considered **significant** under project conditions and **significant and unavoidable** under cumulative conditions.

Alternative 1 would also result in potential mining operation conflicts, risks, and the associated **significant and unavoidable** impacts. However, the extent of this impact would be reduced as compared to the proposed project as the No Project Alternative encompasses a Planning Area that is 28,009.75 acres less than that under the proposed project.

Naturally Occurring Asbestos Impacts (Impact 4.11.6)

Natural asbestos occurs commonly in ultramafic rocks and the presence of ultramafic rocks within a region indicates the possibility of naturally occurring asbestos materials. The proposed GP Planning Area has the potential to contain these sources of naturally occurring asbestos. Since there are no established safe exposure levels for residential areas, public exposure to any amount of asbestos poses a potential health risk. Impacts are therefore **significant**.

Alternative 1 would have similar **significant** impacts though it includes a smaller Planning Area and has less potential to contain sources of naturally occurring asbestos.

Visual Resources

Alteration of Visual Character (Impact 4.12.3)

The proposed project policy provisions assist in minimizing visual impacts related to the conversion of agricultural lands to urban uses by adopting and enforcing development design, landscape, and façade maintenance standards, building codes, and community standards, as well as by implementing open space preservation techniques and building design standards. However, given the size of the Planning Area, the proposed project would nevertheless result in a substantial change in visual resources in the Planning Area. There are no feasible mitigation measures available to offset this change in visual resources, as the urban uses proposed under the project are fundamentally different from current farmland uses. Thus, this impact is considered significant and unavoidable.

Though implementation of **Alternative 1** would reduce visual impacts by converting less land from agricultural to intense urban uses, urban development allowed under this alternative would still result in significant alteration of existing rural and open space characteristics within the Planning Area. This impact would also be **significant and unavoidable** for Alternative 1.

Daytime Glare and Nighttime Lighting (Impact 4.12.4)

Implementation of the proposed project would result in the intensification of land uses within the Planning Area, which has the potential to create new sources of daytime glare and nighttime illumination. Thus, impacts are **potentially significant**.

Under **Alternative 1**, with a Planning Area of only 3,759.90 acres (versus the 31,769.65-acre Planning Area for the proposed project), though less rural/open space land would be converted for urban uses, the intense urbanization of rural and open spaces would also contribute to increased daytime glare and nighttime lighting. Impacts would therefore remain **significant and unavoidable**.

Cumulative Visual Resource Impacts (Impact 4.12.5)

Implementation of proposed policies and action items would reduce the proposed project's cumulative impacts on visual resources through the adoption and enforcement of development design standards, landscape and façade maintenance programs, building codes, and community standards, as well as the implementation of open space preservation techniques, building design standards, growth boundary programs, and nighttime lighting controls. However, with implementation of the proposed General Plan, increased development would occur and changes to existing scenic resources would be inevitable. Therefore, this impact is considered significant and unavoidable.

Though implementation of **Alternative 1** would reduce visual impacts by converting less land from agricultural to intense urban uses, urban development allowed under this alternative would still result in significant cumulative alterations of existing rural and open space characteristics within the Planning Area. This impact would also be **significant and unavoidable** for Alternative 1.

Public Services and Utilities

Wildland Fire Impacts (Impact 4.13.1.2)

Implementation of the proposed project could result in safety hazards associated with wildland fires in residential, commercial and industrial areas adjacent to open space and natural areas. The Planning Area is located in an area susceptible to risk of wildland fires. The entire County is classified as moderate to very high fire hazard severity based on CALFIRE analysis of fuels, terrain and weather. The rural setting coupled with hot, dry summers, dense clusters of trees as well as dry grasses present the potential for wildland fire. This is considered a **potentially significant** impact.

Even with a smaller Planning Area, **Alternative 1** would result in similar wildfire impacts as that under the proposed project, and this impact would still be considered **potentially significant**.

Waste Discharge Requirements (Impact 4.13.4.2)

The lone secondary WWTP is currently operating under Cease and Desist Order No. R5-2003-0108 (CDO). The CDO was adopted by the Central Valley RWQCB due to concerns with the seepage along the southern creek bank of Sutter Creek to the immediate north of the lone secondary WWTP ponds. It was concluded that the seepage amounted to a discharge of WWTP effluent into Sutter Creek. In addition, the Central Valley RWQCB identified that the percolation ponds were potentially impacting the groundwater quality underlying the plant. The proposed project would increase wastewater flows and disposal of these flows into percolation ponds would

further exacerbate seepage and groundwater impacts identified in the CDO. This impact is **potentially significant**.

Alternative 1 would result in reduced wastewater flows given its reduced development potential as compared to the proposed project. Therefore Alternative 1 would have less of an impact than the proposed project.

6.4 ALTERNATIVE 2 – WESTWARD FOCUSED GROWTH

CHARACTERISTICS

The Westward Focused Growth Alternative would include housing in the northwestern direction of the city with Q Ranch designated for low-density residential and Ringer Ranch designated for high-density residential and affordable housing near the Mule Creek State Prison entrance (see Figure 6.0-2). Commercial uses are proposed at SR 88 and Buena Vista and SR 104. A community park is proposed near the tertiary plant, west of the city. Low-density residential is also proposed in the area to the west of the existing city limits, roughly to the south of Waterman Road and both east and west of SR 124. The Planning Area under Alternative 2 would remain at 31,769.65 acres. At buildout, this alternative would consist of a population of 26,091 persons, 10,113 dwelling units, and 12,800 jobs.

COMPARATIVE ANALYSIS

Land Use and Planning

Land Use Incompatibilities (Impact 4.1.2)

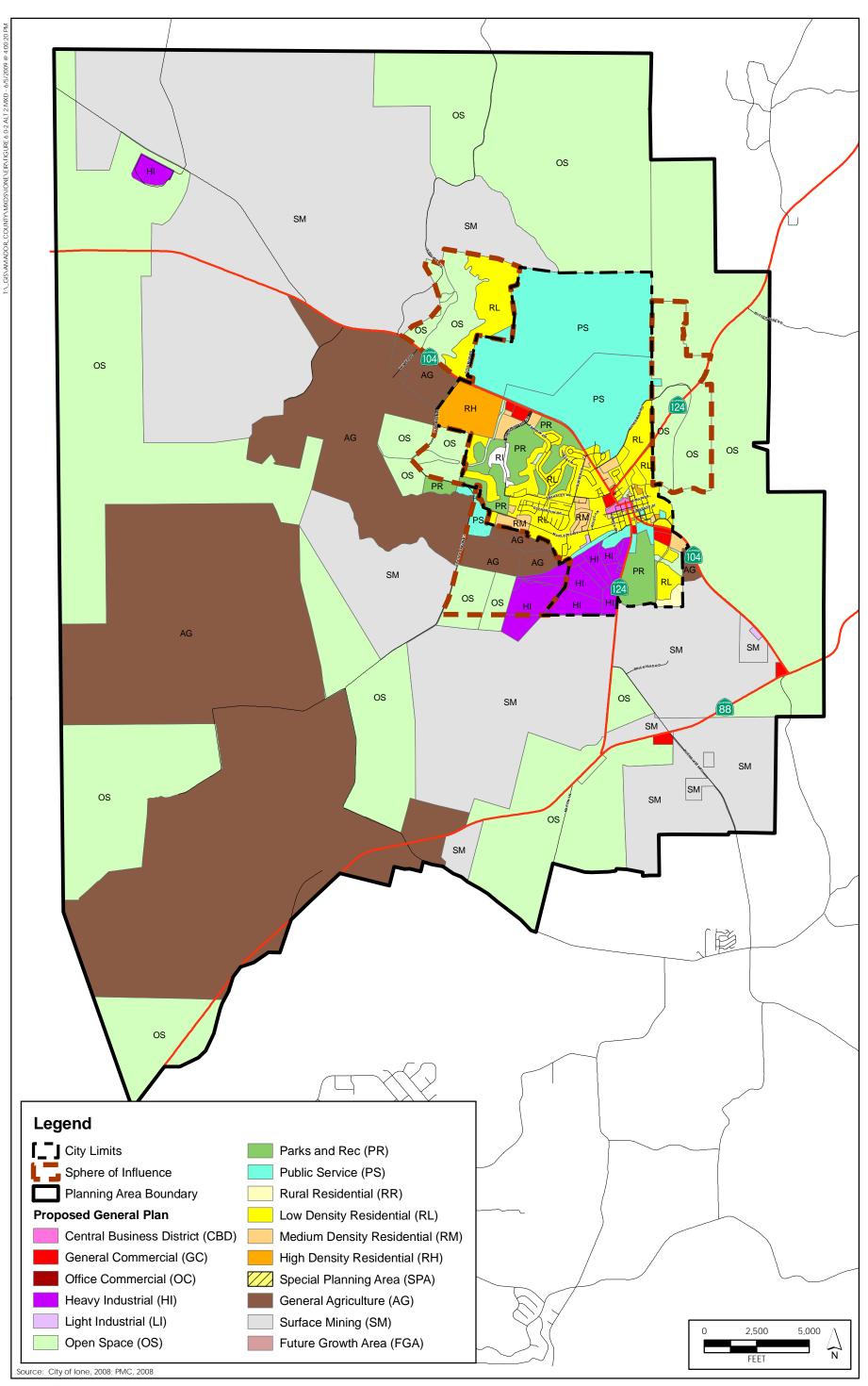
The proposed General Plan Land Use Map was developed with the intent to designate areas for the most appropriate type of land use based on existing land uses, the existing and planned circulation system, the specific needs of lone, environmental constraints, and other factors. Land use designations in the existing city limits are largely unchanged (from the 1982 General Plan Land Use Map). Most of the areas in the city do not have areas of significant potential land use incompatibility. As such, implementation of the proposed Land Use Map would not be expected to result in many significant land use incompatibilities since the proposed GP policies contain language that would assist in mitigating any potential impacts. Areas that could pose potential land use incompatibility include locating residential development such as Castle Oaks and Special Planning Areas (Castle Oaks Gateway, Ringer Ranch, Preston Reuse and 124 Corridor) adjacent to the Mule Creek State Prison and CALFIRE facilities. Therefore this impact is identified as **potentially significant**.

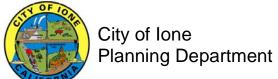
Alternative 2 would also allow residential areas adjacent to the Mule Creek State Prison and CALFIRE facilities. In addition, Alternative 2 would allow Surface Mining land uses adjacent to residential uses in the southeastern portion of the city and High Density Residential uses adjacent to General Agricultural uses in the western portion of the city (area where the Ringer Ranch SPA is located in the proposed project). These areas could result in land use incompatibilities similar to the proposed project. Therefore, land use compatibility impacts associated with Alternative 2 would be similar to those occurring under the proposed project and would remain potentially significant.

<u>Project and Cumulative Consistency Impacts with Relevant Land Use Planning Documents (Impacts 4.1.3 and 4.1.4)</u>

The more intensive land use patterns within the Planning Area under the proposed project would contribute to the environmental effects of growth anticipated to occur in the region in the foreseeable future. The proposed project would increase the existing General Plan Planning Area by approximately 28,009.75 acres and would accommodate a larger population and employment base within the Planning Area through the intensification of development. The proposed project would also designate more land for open space as compared to the existing County General Plan, and the proposed land use pattern and development intensity would substantially contribute to the conversion of land in the region to more urban uses through the designation of currently vacant lands for residential, mixed-use, commercial, and industrial development, and roadway improvement projects including the West Ione Roadway Improvement Strategy (WIRIS). The significant environmental effects of such conversions are discussed and analyzed in greater detail in the various sections of this Draft EIR that relate specifically to those particular issue areas (see Section 4.2 through 4.13). This impact is identified as significant and unavoidable under project and cumulative conditions.

Alternative 2 would increase the city's Planning Area by 28,009.75 acres and would allow for more intensive land use patterns than currently exist in the Planning Area similar to the proposed project. Therefore this impact would remain **significant and unavoidable**. However, Alternative 2 would have less impact than the proposed project, since it proposes more open space within the SOI and the Planning Area outside the City limits and would therefore be less like to conflict with existing county lands identified for agricultural and industrial uses.





Agricultural Resources

Project and Cumulative Loss and Conversion of Agricultural Lands (Impacts 4.2.1 and 4.2.4)

Implementation of the proposed project Land Use Map would designate a total of 293.10 acres of Important Farmland (62.67 acres Prime Farmland + 1.35 acres Unique Farmland + 13.67 acres Farmland of Statewide Importance + 215.41 acres Farmland of Local Importance) within the Planning Area for urban uses. This impact is **significant and unavoidable** under project and cumulative conditions.

Alternative 2 would designate a total of 269.63 acres of Important Farmland (56.07 acres Prime Farmland + 1.35 acres Unique Farmland + 4.91 acres Farmland of Statewide Importance + 207.30 acres Farmland of Local Importance) within the Planning Area for urban uses. Therefore, Alternative 2 would result in the conversion of 23.47 fewer acres of Important Farmland than the proposed project. However, this would still be considered a significant and unavoidable impact.

Agricultural/Urban Interface Conflicts (Impact 4.2.2)

Implementation of the proposed project Land Use Map would place urbanized land uses adjacent to agricultural uses and would replace existing agricultural uses. It is anticipated that as the city builds out, new agriculture/urban interface conflicts may occur, particularly in the areas outside the city limits. This impact is identified as **significant and unavoidable**.

Alternative 2 would also result in potential interface conflicts since it also allows for urban development to occur adjacent to agricultural uses. Therefore, Alternative 2 would result in a similar **significant and unavoidable** impact to the proposed project.

Agricultural Zoned Lands and Williamson Act Contract Conflicts (Impact 4.2.3)

The Planning Area contains approximately 5,077.47 acres currently under a Williamson Act contract and in non-renewal status. However, none of this land is located within the existing city limits, but is in those portions of the Planning Area that lie outside the city limits. Most of this land is designated to as either General Agriculture (AG) or Open Space (OS), thereby allowing these lands to continue in agricultural operation. However, portions of three parcels within the Triangle Planning Area totaling 91.09 acres would be allowed to develop with various types of urban uses. This potential for development would be in violation of Williamson Act contracts and therefore this impact is considered to be **potentially significant**.

Alternative 2 would allow the same Williamson Act lands within the Triangle Planning Area to develop with Surface Mining uses. Therefore, Alternative 2 would result in the loss of 91.09 acres of Williamson Act contract lands. This impact is considered **significant and unavoidable** and the extent of this loss would be identical to the proposed project.

Population and Housing

Project and Cumulative Population, Housing and Employment Increases (Impacts 4.3.1 and 4.3.4)

Development under the proposed project and its associated project components would lead to an increase in population and employment. Development and growth in the city, as a result of the implementation of the proposed project, would contribute to cumulative population and housing conditions in the unincorporated areas of Amador County, as well as in surrounding

cities and counties. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Alternative 2 would result in a population of 26,091 persons in the Planning Area, an increase of 7,909 persons in comparison to the proposed project. Therefore, Alternative 2 would result in a greater increase in population than the proposed project. These increases would involve physical effects to the environment resulting in a **significant and unavoidable** impact. In addition, this alternative would accommodate future growth in the region to a greater extent than the proposed project, which could result in displacement of this growth into other areas of Amador County and the greater Central Valley region.

Jobs/Housing Balance Impact 4.3.3)

Implementation of the proposed project is anticipated to have the capacity for up to 12,800 jobs and approximately 7,475 housing units. This would result in a jobs-per-housing ratio of 1.7. It is generally considered ideal to have approximately one job per housing unit in a jurisdiction. A ratio of 1.7 therefore indicates that the Planning Area would have substantially more jobs than housing. This could potentially result in attracting substantial numbers of workers from outside the Planning Area, thereby resulting in increases in traffic congestion, air emissions, and mobile-source noise. This impact is considered **significant**.

Alternative 2 would result in the same number of jobs as the proposed project (12,800), but would accommodate 10,113 housing units. Therefore, **Alternative 2** would result in a jobs-perhousing ratio of 1.3. Since Alternative 2 would not result the ideal of one job-per-housing unit, this impact would remain **significant**. However, impacts would be improved in comparison to the project as the proposed project would result in a jobs-per-housing ratio of 1.7.

Transportation and Circulation

Project and Cumulative Roadway Segment and Freeway Impacts (Impacts 4.4.1 and 4.4.5)

Implementation of the proposed project would provide service levels consistent with the city's LOS "D" standard with few exceptions. The proposed project would result in LOS F within the General Plan planning horizon on:

- SR 104 between Sutter Lane and SR 124 North
- SR 104 between SR 124 North and E Main Street
- SR 104 between SR 124 South and Foothills Blvd
- SR 124 between E Main Street and Washington Street
- SR 124 between Washington Street and WIRIS
- SR 124 between WIRIS and Buena Vista Road

With full development of the Planning Area and regional growth in traffic, these impacts are anticipated to worsen. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Alternative 2 has greater development and population capacity than the proposed project and therefore more potential for significant impacts to the circulation system as increased population and development would result in increased in local and regional traffic. As such, impacts under Alternative 2 would be **significant and unavoidable** and these impacts would be greater than those of the proposed project.

Project and Cumulative Transit System Impacts (Impact 4.4.3)

Implementation of the proposed project would result in an increase in the demand for public transit service. While Amador Regional Transit (ARTs) currently provides six in-bound and outbound trips per day to Sutter Hill and Buena Vista/Comanche, the growth of the city may eventually require greater decreased headway, additional busses, or additional bus stops. The growth in the population and employment sector proposed by the General Plan may increase ridership beyond what is available or planned. Therefore, future unmet transit demand in lone is a **potentially significant** impact.

Increases in population result in an increase in the demand for public transit service. Therefore, demand for transit under Alternative 2 would be greater than under the proposed project as this alternative has the capacity for a total population of 7,909 more persons than the proposed project. Therefore, impacts would remain **significant**.

Air Quality

Project and Cumulative Impacts on Air Attainment Plans (Impacts 4.5.1 and 4.5.6)

Population growth and the development potential under the proposed project could emit non-attainment pollutants within Amador County that could challenge the region's ability to meet ozone and PM standards. **Tables 4.5-5** and **4.5.-6** indicate the levels of emissions from vehicles and electricity and natural gas use, associated with residential heating in the winter, landscaping activities, etc. Since a General Plan's impacts on cumulative air quality in a region is determined by its consistency with applicable attainment plans, and since there is currently no ozone attainment plan for Amador County, this impact is considered **significant and unavoidable** under project and cumulative conditions.

Without an ozone attainment plan for the region, **Alternative 2** too would result in impacts that are **significant and unavoidable**.

Odor Emissions (Impact 4.5.3)

Implementation of the proposed project has the potential to allow for several types of project that could locate sensitive receptors near existing and future sources of objectionable odors. In addition, future construction activities could result in odorous emissions from diesel exhaust associated with construction equipment. Thus, this impact is **potentially significant**.

Implementation of **Alternative 2** would include land uses that may produce odorous emissions or may allow for the construction of sensitive land uses near existing or future sources or odorous emissions. Since this alternative has the capacity for a total population of 7,909 more persons than the proposed project, it would result in an increased population that could be exposed to objectionable odors. In addition, this alternative proposes 398.09 acres within the Planning Area for industrial uses, as compared to only 398.09 acres of industrial uses in the proposed project. Industrial lands are more likely to develop with odor-producing uses such as transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing, fiberglass manufacturing, auto body shops, rendering plants, and coffee roasters. Therefore, more odor-producing projects are allowed under this alternative and odor emission impacts would be worse than under the proposed project.

Expose Sensitive Receptors to Toxic Air Contaminants (TACs) (Impact 4.5.4)

Trenching, grading, and other excavations associated with future development under the proposed project could expose zones of asbestos-containing rock and possibly cause airborne releases of fibrous minerals in areas containing ultramafic rocks or potentially in areas containing undivided Mesozoic volcanic and metavolcanic rocks. Therefore, implementation of the proposed General Plan Land Use Map could result in releases of, and exposure to, NOA. This is a significant impact.

Areas within the Planning Area that have the potential to contain sources of naturally occurring asbestos are shown in Figure 4.11-2 in Section 4.11, Geology and Soils. Both the proposed project and **Alternative 2** would allow urban development in areas with potential sources of naturally occurring asbestos. However, Alternative 2 would result in increased population that could be exposed to NOA and therefore this impact would be worse in comparison to the proposed project.

Construction CO Emissions (Impact 4.5.5)

The General Plan update and its associated project components includes land use designations that would allow for future construction of residential, commercial, industrial, and other projects. This will result in construction-related emissions from future projects that would generally be short-term in duration, but may still cause adverse air quality impacts. Inhalable PM₁₀ is the pollutant of greatest concern associated with construction activities. PM₁₀ emissions can result from construction activities facilitated by the proposed General Plan, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. This is considered a **potentially significant** impact.

Alternative 2 has the capacity to result in 2,638 more housing units in the Planning Area than the proposed project and therefore more potential to result in construction-related emissions from future projects. As such, impacts under Alternative 2 would be **significant and unavoidable** and these impacts would be greater than those of the proposed project.

Conflict or Obstruct with Implementation of Greenhouse Gas Reduction Measures (Impacts 4.5.7)

Implementation of the proposed project and its associated project components would increase emissions of CO2e by 2030 over existing (2008) conditions. This increase in GHG emissions is inconsistent with AB 32's goal of reducing 2020 greenhouse gas emissions to 1990 levels. Table 4.5-11 illustrates that most of these increases are likely to come from increases in housing associated with the city's population growth. These increases would increase the carbon footprint of lone in 2030. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions will further contribute to climate change. Also, the projected growth in the City of lone could contribute to global increases in temperature that could increase exposure of future development to risk related to significant storm events, sea level rise and flooding resulting from global climate change. The proposed project does include a number of policies that would indirectly help mitigate citywide GHG emissions by reducing activities from several key sources of GHGs, including motor vehicles, water conveyance, waste collection, and energy consumption. However, due to the expected increases in GHG emissions resulting from the growth associated with the proposed project, and since the potential extent and severity of any such risk is

speculative, given the unknown nature of potential impacts of climate change on lone, this impact would be **significant and unavoidable**.

Alternative 2 has the capacity to result in 7,909 more persons and 2,638 more housing units than the proposed project. As discussed above, most of the anticipated GHG increases associated with the proposed project are likely to come from increases in housing associated with the city's population growth. Since this alternative would result in more housing units than the proposed project, it would also result in more GHG emissions than the proposed project. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions associated with Alternative 2 would contribute to climate change to a greater degree than the proposed project and would result in a significant and unavoidable impact.

Noise

Construction Noise Impacts (Impacts 4.6.1 and 4.6.4)

Implementation of the proposed project could result in activities associated with construction could result in elevated noise levels at noise-sensitive land uses. Increases in ambient noise levels, particularly during the nighttime hours, could result in increased levels of annoyance and potential sleep disruption. This impact would be considered **potentially significant**.

Alternative 2 has the capacity to result in 2,638 more housing units than the proposed project. Therefore, Alternative 2 would result in a greater **potentially significant** impact associated with construction related noise resulting from new development than the proposed project.

Project and Cumulative Transportation Noise Impacts (Impacts 4.6.2 and 4.6.5)

Projected future noise contours for major roadways within the city and predicted increases in traffic noise levels associated with future development in the Planning Area are summarized in **Table 4.6-7** and depicted in **Figure 4.6-3** (refer to Impact 4.6-2). Buildout of the Planning Area as set forth in the proposed project would result in additional traffic along these roadways and result in increased noise. This impact would be **significant and unavoidable** under project and cumulative conditions.

Since implementation of **Alternative 2** would result in increased population and development potential in comparison to the proposed project, traffic noise impacts would remain **significant and unavoidable** and would be worse under this alternative than under the proposed project.

Stationary/Non-Transportation Noise Impacts (Impacts 4.6.3)

Implementation of the proposed project policies and actions would reduce noise associated with new stationary noise sources and the placement of new noise-sensitive land uses over which the city has jurisdiction (e.g., commercial and industrial sites, residential uses). However, some stationary noise impacts cannot be mitigated to a less than significant level due to limitations on the city to control the exact placement of substantial noise-generating uses (e.g., school facilities) in proximity to noise-sensitive land uses (e.g., residential). Accordingly, stationary source noise levels from activities on uses for which the city has limited control could result in noise levels that exceed the city's maximum allowable noise standards. Thus, this impact is considered significant and unavoidable.

Alternative 2 would result in worse noise impacts given that it would also allow for increased future development and population and associated noise impacts. This impact would also be **significant and unavoidable** for Alternative 2.

Biological Resources

Impacts to Special-Status Species (Impact 4.8.1)

Development under the proposed project could potentially cause direct and indirect impacts to approximately 16,746 acres of vegetation types that as occupied or potential habitat for listed species. As the final design and extent of future development is not currently known, the acreages listed in **Table 4.8-8** represent the maximum area that could be directly affected. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 2** encompasses the same Planning Area as the proposed project, it has a similar potential to cause direct and indirect impacts to special-status species. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 fewer acres of land disturbance, which would result in fewer potential impacts to special-status species. Therefore, while this impact would remain **significant** under Alternative 2, it would be better than under the proposed project.

Impacts to Species of Concern and Other Non-Listed Special-Status Species (Impact 4.8.2)

Suitable habitat exists in the Planning Area for unlisted but nonetheless special-status species. These species are designated as a species of concern by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Game (CDFG), and/or listed in the CNPS's online inventory as List 2. Direct impacts to these species would occur for the same reasons and in the same manner as direct and indirect impacts to listed species as identified and discussed in Impact 4.8.1. **Table 4.8-9** provides information on the acreages of suitable habitat that would be affected by implementation of the proposed project. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 2** encompasses the same Planning Area as the proposed project, it has a similar potential to cause direct and indirect impacts to unlisted species of concern. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 fewer acres of land disturbance, which would result in fewer potential impacts to special-status species. Therefore, while this impact would remain **significant** under Alternative 2, it would be better than under the proposed project.

Impacts to Sensitive Habitats (Impact 4.8.3)

Implementation of the proposed project could result in disturbance, degradation, and removal of up to 147 acres of valley oak woodland, 3,306 acres of blue oak woodland, 322 acres of blue

oak foothill pine, and 821 acres of montane hardwood which has a high potential to support vernal pools, a CDFG sensitive habitat. Vernal pools require the surrounding upland habitat to maintain their habitat value and function. Approximately 501.2 acres of wetland and open water habitat would also be in direct conflict with the proposed land use designation (i.e. industrial, residential and other built environment). Implementation of the proposed project could also result in disturbance, degradation, and removal of riparian habitat, and would result in the conversion of farmland that provides habitat to several listed species and impacts are considered significant.

Since **Alternative 2** encompasses the same Planning Area as the proposed project, it has a similar potential to cause impacts to sensitive habitats. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 fewer acres of land disturbance, which would result in fewer potential impacts to special-status species. Therefore, while this impact would remain **significant** under Alternative 2, it would be better than under the proposed project.

Impacts to Migratory Corridors (Impact 4.8.4)

Implementation of the proposed project would interfere substantially with the movement of several special status and common wildlife species. Wildlife movement corridors are routes frequently utilized by wildlife that provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat. This would be a **significant** impact.

Alternative 2 could result in increased habitat degradation due to additional traffic, increased human presence, and degradation of the water quality in comparison to the proposed project. This would be considered a **potentially significant** impact and would be worse under Alternative 2 than under the proposed project.

Cumulative Biological Resource Impacts (Impact 4.8.6)

Implementation of the proposed project could result in the loss of substantial sensitive habitat areas as well as farmland utilized by state and federally listed species that would add to cumulative loss of such habitat. Given the extent of this potential conversion and loss of habitat, this impact is considered **significant and unavoidable**.

As discussed above, **Alternative 2** designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 fewer acres of land disturbance, which would result in fewer potential cumulative impacts to biological resources. Therefore, while this impact would remain **significant and unavoidable** under Alternative 2, it would be better than under the proposed project.

Cultural and Paleontological Resources

Project and Cumulative Prehistoric and Historic Resource Impacts (Impacts 4.9.1, 4.9.2, 4.9.4, and 4.9.5)

Cumulative development in the region would result in the loss and/or degradation of cultural resources. These cumulative effects of development on cultural resources would be significant.

Since most of the Planning Area, particularly outside the city limits has not been surveyed for cultural resources, there is the potential for future development to uncover previously undiscovered cultural resources because of the area's historic occupation by Native Americans, Spanish, and other groups of settlers. Buildout of the Planning Area could contribute to the cumulative loss of cultural resources in the region. The proposed project contains several policies and action items that would mitigate its contribution to this impact. Thus, this impact is **potentially significant** under project and cumulative conditions.

Since **Alternative 2** encompasses the same Planning Area as the proposed project, it has similar potential for future development to uncover previously undiscovered cultural resources. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 fewer acres of land disturbance, which would result in fewer potential impacts to previously undiscovered cultural resources. Therefore, while this impact would remain **potentially significant** under Alternative 2, it would be better than under the proposed project.

Project and Cumulative Paleontological Resource Impacts (Impacts 4.9.3 and 4.9.6)

A search of the University of California, Berkeley Museum of Paleontology collections database identified only one fossilized plant within the boundaries of the city. The sensitivity of the area for paleontological resources, however, has not been assessed on a parcel by parcel basis, and no formal paleontological investigations were identified for the area. Consequently, implementation of the proposed project could impact undiscovered paleontological resources. This impact is **significant** under project and cumulative conditions. However, the proposed project policies and action items in the Historic and Cultural Resources Element include provisions that would ensure paleontological resources are protected.

Since **Alternative 2** encompasses the same Planning Area as the proposed project, it has similar potential for future development to uncover previously undiscovered paleontological resources. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 fewer acres of land disturbance, which would result in fewer potential impacts to previously undiscovered paleontological resources. Therefore, while this impact would remain **potentially significant** under Alternative 2, it would be better than under the proposed project.

Hydrology and Water Quality

Construction, Operation, Groundwater, and Cumulative Water Quality Impacts (Impacts 4.10.1, 4.10.2, and 4.10.3)

Continued compliance with applicable SWRCB statewide water quality permits and the city's Storm Water Quality Management Program would minimize the pollutant load of storm drainage within the Planning Area from development that could be accommodated under the proposed GPU. Implementation of General Plan Update policies would further protect surface and groundwater quality and mitigate the city's contribution to this impact by protecting natural streams and drainages, reducing potential sources of pollutants, and requiring the use of landscaping and other BMPs to prevent pollutants from entering surface and groundwater resources. As such, the city's contribution to cumulative water quality impacts is considered a significant impact under project and cumulative conditions.

Alternative 2 has the capacity to result in 7,909 more persons and 2,638 more housing units than the proposed project. Therefore, this alternative would have increased potential to impact water quality. Development projects under this alternative would also have to comply with SWRCB statewide water quality permits and the city's Storm Water Quality Management Programs. However, Alternative 2 would result in a greater population and more development than the proposed project and would therefore result in greater pollutant loads and storm drainage.

Exposure to Flood Hazards (Impact 4.10.4)

The Planning Area is traversed by several creeks for which 100-year floodplains have been mapped by FEMA or the State of California DWR. Some of the 100-year floodplain area mapping within the Planning Area has only been based on approximate method technical evaluations and does not include detailed information such as base flood (100-year) elevations. In these areas, the possibility of exposing structures and facilities to flood hazards and potential damage as a part of new development is considered to be a **potentially significant** impact.

Alternative 2 has the capacity to result in 7,909 more persons and 2,638 more housing units than the proposed project. Therefore, this alternative would result in greater exposure of persons and development to flooding hazards. Alternative 2 would result in a potentially significant impact.

Geology and Soils

Slope Instability and Landslides (Impacts 4.11.3)

Implementation of the proposed project, along with potential development in the Planning Area could result in slope instability near the edges of steep slopes and if temporary or permanent cut and/or fill slopes were made during construction. Therefore, implementation of the proposed project could expose new development within the city limits to hazards associated with slope instability and landslides. This is a **potentially significant** impact.

Alternative 2 would result in similar project impacts related to slope instability. This alternative would also result in **significant** impacts and the extent of this impact would be increased in comparison to the proposed project since this alternative has the capacity to result in 7,909 more persons and 2,638 more housing units than the proposed project.

Project and Cumulative Loss of Mineral Resources (Impacts 4.11.5 and 4.11.8)

Current mining operations within the Planning Area are designated as Surface Mining (SM) and are anticipated to continue with mining operations and the extraction of mineral resources. Encroachment of urban uses in adjacent areas could result in conflicts with these mining operations and impacts could be potentially significant. This impact is considered **significant** under project conditions and **significant and unavoidable** under cumulative conditions.

Alternative 2 designates 9,445.7 acres within the Planning Area for Surface Mining, as compared to only 8,199.05 acres designated for Surface Mining by the proposed project. Therefore, this alternative would result in greater potential mining operation conflicts, risks, and the associated **significant and unavoidable** impacts than the proposed project as more land would be utilized for mining operations.

Naturally Occurring Asbestos Impacts (Impact 4.11.6)

Natural asbestos occurs commonly in ultramafic rocks and the presence of ultramafic rocks within a region indicates the possibility of naturally occurring asbestos materials. The proposed GP Planning Area has the potential to contain these sources of naturally occurring asbestos. Since there are no established safe exposure levels for residential areas, public exposure to any amount of asbestos poses a potential health risk. Impacts are therefore **significant**.

Areas within the Planning Area that have the potential to contain sources of naturally occurring asbestos are shown in Figure 4.11-2 in Section 4.11, Geology and Soils. Both the proposed project and **Alternative 2** would allow urban development in areas with potential sources of naturally occurring asbestos. Therefore, Alternative 2 would have a similar **significant** impact as the proposed project.

Visual Resources

Alteration of Visual Character (Impact 4.12.3)

The proposed project policy provisions assist in minimizing visual impacts related to the conversion of agricultural lands to urban uses by adopting and enforcing development design, landscape, and façade maintenance standards, building codes, and community standards, as well as by implementing open space preservation techniques and building design standards. However, given the size of the Planning Area, the proposed project would nevertheless result in a substantial change in visual resources in the Planning Area. There are no feasible mitigation measures available to offset this change in visual resources, as the urban uses proposed under the project are fundamentally different from current farmland uses. Thus, this impact is considered significant and unavoidable.

Although **Alternative 2** has greater development and population capacity than the proposed project, it designates 11,806.50 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,606.03 more acres of Open Space, which would result in fewer potential impacts to visual resources. Urban development allowed under this alternative would still result in a **significant and unavoidable** alteration of existing rural and open space characteristics within the Planning Area. However, impacts would be less than those of the proposed project.

Daytime Glare and Nighttime Lighting (Impact 4.12.4)

Implementation of the proposed project would result in the intensification of land uses within the Planning Area, which has the potential to create new sources of daytime glare and nighttime illumination. Thus, impacts are **potentially significant**.

Under **Alternative 2**, would increase daytime glare and nighttime illumination in comparison to the proposed project by allowing increased intensification of land uses in comparison to the proposed project. Urban development allowed under this alternative would still result in a **significant and unavoidable** daytime glare and nighttime illumination impacts within the Planning Area.

Cumulative Visual Resource Impacts (Impact 4.12.5)

Implementation of proposed policies and action items would reduce the proposed project's cumulative impacts on visual resources through the adoption and enforcement of development

design standards, landscape and façade maintenance programs, building codes, and community standards, as well as the implementation of open space preservation techniques, building design standards, growth boundary programs, and nighttime lighting controls. However, with implementation of the proposed General Plan, increased development would occur and changes to existing scenic resources would be inevitable. Therefore, this impact is considered significant and unavoidable.

As discussed above, **Alternative 2** would result in 2,606.03 more acres of Open Space within the Planning Area than the proposed project, which would result in fewer potential impacts to visual resources. Urban development allowed under this alternative would still result in a **significant and unavoidable** cumulative alteration of existing rural and open space characteristics within the Planning Area. However, impacts would be less than those of the proposed project.

Public Services and Utilities

Wildland Fire Impacts (Impact 4.13.1.2)

Implementation of the proposed project could result in safety hazards associated with wildland fires in residential, commercial and industrial areas adjacent to open space and natural areas. The Planning Area is located in an area susceptible to risk of wildland fires. The entire County is classified as moderate to very high fire hazard severity based on CALFIRE analysis of fuels, terrain and weather. The rural setting coupled with hot, dry summers, dense clusters of trees as well as dry grasses present the potential for wildland fire. This is considered a **potentially significant** impact.

Alternative 2 has the capacity to result in 7,909 more persons and 2,638 more housing units than the proposed project. Therefore, this alternative would result in greater exposure of persons and development to wildland fire hazards. Therefore, Alternative 2 would result in a worse **potentially significant** impact than the proposed project.

Waste Discharge Requirements (Impact 4.13.4.2)

The lone secondary WWTP is currently operating under Cease and Desist Order No. R5-2003-0108 (CDO). The CDO was adopted by the Central Valley RWQCB due to concerns with the seepage along the southern creek bank of Sutter Creek to the immediate north of the lone secondary WWTP ponds. It was concluded that the seepage amounted to a discharge of WWTP effluent into Sutter Creek. In addition, the Central Valley RWQCB identified that the percolation ponds were potentially impacting the groundwater quality underlying the plant. The proposed project would increase wastewater flows and disposal of these flows into percolation ponds would further exacerbate seepage and groundwater impacts identified in the CDO. This impact is potentially significant.

Alternative 2 would result in increased wastewater flows in comparison to the proposed project given its increased development and population potential as compared to the proposed project. Therefore Alternative 2 would have a greater **potentially significant** impact than under the proposed project.

6.5 ALTERNATIVE 3 – SOUTHWARD FOCUSED GROWTH

CHARACTERISTICS

The Southward Focused Growth Alternative includes residential growth south of the city limits, west of Castle Oaks, low-density residential growth in the Q Ranch area and east of SR 124 around Waterman Road (see **Figure 6.0-3**). Affordable housing is proposed at SR 124 on the eastern edge of town. Commercial uses are proposed at SR 88 and Buena Vista Road, and SR 104 and Buena Vista Road. Areas north of the Old Stockton Policy Area and south of Marlette Street are proposed for Open Space and low-density residential. A community park is proposed near the tertiary plant west of the city. The Planning Area under Alternative 2 would remain at 31,769.65 acres. At buildout, this alternative would consist of a population of 26,757 persons, 10,371 dwelling units, and 12,800 jobs.

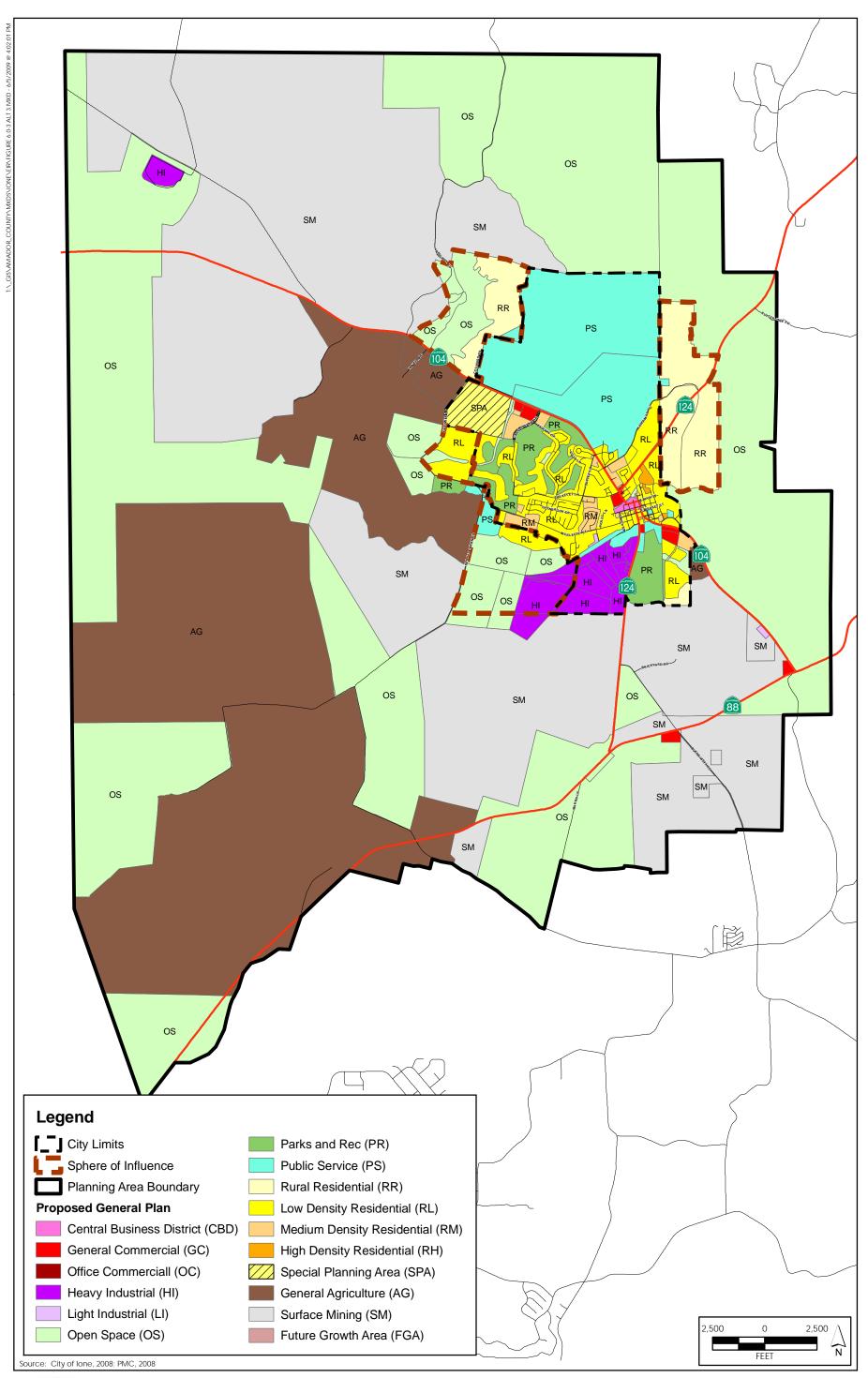
COMPARATIVE ANALYSIS

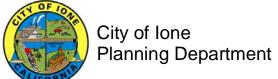
Land Use and Planning

Land Use Incompatibilities (Impact 4.1.2)

The proposed General Plan Land Use Map was developed with the intent to designate areas for the most appropriate type of land use based on existing land uses, the existing and planned circulation system, the specific needs of lone, environmental constraints, and other factors. Land use designations in the existing city limits are largely unchanged (from the 1982 General Plan Land Use Map). Most of the areas in the city do not have areas of significant potential land use incompatibility. As such, implementation of the proposed Land Use Map would not be expected to result in many significant land use incompatibilities since the proposed GP policies contain language that would assist in mitigating any potential impacts. Areas that could pose potential land use incompatibility include locating residential development such as Castle Oaks and Special Planning Areas (Castle Oaks Gateway, Ringer Ranch, Preston Reuse and 124 Corridor) adjacent to the Mule Creek State Prison and CALFIRE facilities. Therefore this impact is identified as **potentially significant**.

Alternative 3 would also allow residential areas adjacent to the <u>Mule Creek State Prison and CALFIRE facilities</u>. In addition, Alternative 2 would allow Surface Mining land uses adjacent to residential uses in the southeastern portion of the city. These areas could result in land use incompatibilities similar to the proposed project. Therefore, land use compatibility impacts associated with Alternative 3 would be similar to those occurring under the proposed project and would remain **potentially significant**.





Project and Cumulative Consistency Impacts with Relevant Land Use Planning Documents (Impacts 4.1.3 and 4.1.4)

The more intensive land use patterns within the Planning Area under the proposed project would contribute to the environmental effects of growth anticipated to occur in the region in the foreseeable future. The proposed project would increase the existing General Plan Planning Area by approximately 28,009.75 acres and would accommodate a larger population and employment base within the Planning Area through the intensification of development. The proposed project would also designate more land for open space as compared to the existing County General Plan, and the proposed land use pattern and development intensity would substantially contribute to the conversion of land in the region to more urban uses through the designation of currently vacant lands for residential, mixed-use, commercial, and industrial development, and roadway improvement projects including the West lone Roadway Improvement Strategy (WIRIS). The significant environmental effects of such conversions are discussed and analyzed in greater detail in the various sections of this Draft EIR that relate specifically to those particular issue areas (see Section 4.2 through 4.13). This impact is identified as significant and unavoidable under project and cumulative conditions.

Alternative 3 would increase the city's Planning Area by 28,009.75 acres and would allow for more intensive land use patterns than currently exist in the Planning Area similar to the proposed project. Therefore this impact would remain **significant and unavoidable**. However, Alternative 3 would have less impact than the proposed project, since it proposes more open space within the SOI and the Planning Area outside the City limits and would therefore be less like to conflict with existing county lands identified for agricultural and industrial uses.

Agricultural Resources

Project and Cumulative Loss and Conversion of Agricultural Lands (Impacts 4.2.1 and 4.2.4)

Implementation of the proposed project Land Use Map would designate a total of 293.10 acres of Important Farmland (62.67 acres Prime Farmland + 1.35 acres Unique Farmland + 13.67 acres Farmland of Statewide Importance + 215.41 acres Farmland of Local Importance) within the Planning Area for urban uses. This impact is **significant and unavoidable** under project and cumulative conditions.

Alternative 3 would designate a total of 312.98 acres of Important Farmland (99.42 acres Prime Farmland + 1.35 acres Unique Farmland + 4.91 acres Farmland of Statewide Importance + 207.30 acres Farmland of Local Importance) within the Planning Area for urban uses. Therefore, Alternative 3 would result in the conversion of 19.88 more acres of Important Farmland than the proposed project. This would be considered a **significant and unavoidable** impact.

Agricultural/Urban Interface Conflicts (Impact 4.2.2)

Implementation of the proposed project Land Use Map would place urbanized land uses adjacent to agricultural uses and would replace existing agricultural uses. It is anticipated that as the city builds out, new agriculture/urban interface conflicts may occur, particularly in the areas outside the city limits. This impact is identified as **significant and unavoidable**.

Alternative 3 would also result in potential interface conflicts since it also allows for urban development to occur adjacent to agricultural uses. This impact is **significant and unavoidable** and the extent of this impact would be similar to the proposed project.

Agricultural Zoned Lands and Williamson Act Contract Conflicts (Impact 4.2.3)

The Planning Area contains approximately 5,077.47 acres currently under a Williamson Act contract and in non-renewal status. However, none of this land is located within the existing city limits, but is in those portions of the Planning Area that lie outside the city limits. Most of this land is designated to as either General Agriculture (AG) or Open Space (OS), thereby allowing these lands to continue in agricultural operation. However, portions of three parcels within the Triangle Planning Area totaling 91.09 acres would be allowed to develop with various types of urban uses. This potential for development would be in violation of Williamson Act contracts and therefore this impact is considered to be **potentially significant**.

Alternative 3 would allow the same Williamson Act lands within the Triangle Planning Area to develop with Surface Mining uses. Therefore, Alternative 3 would result in the loss of 91.09 acres of Williamson Act contract lands. This impact is considered **significant and unavoidable** and the extent of this loss would be identical to the proposed project.

Population and Housing

Project and Cumulative Population, Housing and Employment Increases (Impacts 4.3.1 and 4.3.4)

Development under the proposed project and its associated project components would lead to an increase in population and employment. Development and growth in the city, as a result of the implementation of the proposed project, would contribute to cumulative population and housing conditions in the unincorporated areas of Amador County, as well as in surrounding cities and counties. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Alternative 3 would result in a population of 26,757 persons in the Planning Area, an increase of 8,575 persons in comparison to the proposed project. Therefore, Alternative 3 would result in a greater increase in population than the proposed project. These increases would involve physical effects to the environment resulting in a **significant and unavoidable** impact. In addition, this alternative would accommodate future growth in the region to a greater extent than the proposed project, which could result in displacement of this growth into other areas of Amador County and the greater Central Valley region.

Jobs/Housing Balance Impact 4.3.3)

Implementation of the proposed project is anticipated to have the capacity for up to 12,800 jobs and approximately 7,475 housing units. This would result in a jobs-per-housing ratio of 1.7. It is generally considered ideal to have approximately one job per housing unit in a jurisdiction. A ratio of 1.7 therefore indicates that the Planning Area would have substantially more jobs than housing. This could potentially result in attracting substantial numbers of workers from outside the Planning Area, thereby resulting in increases in traffic congestion, air emissions, and mobile-source noise. This impact is considered **significant**.

Alternative 3 would result in the same number of jobs as the proposed project (12,800), but would accommodate 10,371 housing units. Therefore, Alternative 3 would result in a jobs-perhousing ratio of 1.2. Since Alternative 3 would not result the ideal of one job-per-housing unit, this impact would remain **significant**. However, impacts would be improved in comparison to the project as the proposed project would result in a jobs-per-housing ratio of 1.7.

Transportation and Circulation

Project and Cumulative Roadway Segment and Freeway Impacts (Impacts 4.4.1 and 4.4.5)

Implementation of the proposed project would provide service levels consistent with the city's LOS "D" standard with few exceptions. The proposed project would result in LOS F within the General Plan planning horizon on:

- SR 104 between Sutter Lane and SR 124 North
- SR 104 between SR 124 North and E Main Street
- SR 104 between SR 124 South and Foothills Blvd
- SR 124 between E Main Street and Washington Street
- SR 124 between Washington Street and WIRIS
- SR 124 between WIRIS and Buena Vista Road

With full development of the Planning Area and regional growth in traffic, these impacts are anticipated to worsen. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Alternative 2 has greater development and population capacity than the proposed project and therefore more potential for significant impacts to the circulation system as increased population and development would result in increased in local and regional traffic. As such, impacts under Alternative 3 would be **significant and unavoidable** and these impacts would be greater than those of the proposed project.

Project and Cumulative Transit System Impacts (Impact 4.4.3)

Implementation of the proposed project would result in an increase in the demand for public transit service. While Amador Regional Transit (ARTs) currently provides six in-bound and outbound trips per day to Sutter Hill and Buena Vista/Comanche, the growth of the city may eventually require greater decreased headway, additional busses, or additional bus stops. The growth in the population and employment sector proposed by the General Plan may increase ridership beyond what is available or planned. Therefore, future unmet transit demand in lone is a **potentially significant** impact.

Increases in population result in an increase in the demand for public transit service. Therefore, demand for transit under Alternative 3 would be greater than under the proposed project as this alternative has the capacity for a total population of 8,575 more persons than the proposed project. Therefore, impacts would remain **significant**.

Air Quality

Project and Cumulative Impacts on Air Attainment Plans (Impacts 4.5.1 and 4.5.6)

Population growth and the development potential under the proposed project could emit non-attainment pollutants within Amador County that could challenge the region's ability to meet ozone and PM standards. **Tables 4.5-5** and **4.5.-6** indicate the levels of emissions from vehicles and electricity and natural gas use, associated with residential heating in the winter, landscaping activities, etc. Since a General Plan's impacts on cumulative air quality in a region is determined by its consistency with applicable attainment plans, and since there is currently no ozone attainment plan for Amador County, this impact is considered **significant and unavoidable** under project and cumulative conditions.

Without an ozone attainment plan for the region, **Alternative 3** too would result in impacts that are **significant and unavoidable**.

Odor Emissions (Impact 4.5.3)

Implementation of the proposed project has the potential to allow for several types of project that could locate sensitive receptors near existing and future sources of objectionable odors. In addition, future construction activities could result in odorous emissions from diesel exhaust associated with construction equipment. Thus, this impact is **potentially significant**.

Implementation of **Alternative 3** would include land uses that may produce odorous emissions or may allow for the construction of sensitive land uses near existing or future sources or odorous emissions. Since this alternative has the capacity for a total population of 7,909 more persons than the proposed project, it would result in an increased population that could be exposed to objectionable odors. In addition, this alternative proposes 398.09 acres within the Planning Area for industrial uses, as compared to only 398.09 acres of industrial uses in the proposed project. Industrial lands are more likely to develop with odor-producing uses such as transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing, fiberglass manufacturing, auto body shops, rendering plants, and coffee roasters. Therefore, more odor-producing projects are allowed under this alternative and odor emission impacts would be worse than under the proposed project.

Expose Sensitive Receptors to Toxic Air Contaminants (TACs) (Impact 4.5.4)

Trenching, grading, and other excavations associated with future development under the proposed project could expose zones of asbestos-containing rock and possibly cause airborne releases of fibrous minerals in areas containing ultramafic rocks or potentially in areas containing undivided Mesozoic volcanic and metavolcanic rocks. Therefore, implementation of the proposed General Plan Land Use Map could result in releases of, and exposure to, NOA. This is a significant impact.

Areas within the Planning Area that have the potential to contain sources of naturally occurring asbestos are shown in Figure 4.11-2 in Section 4.11, Geology and Soils. Both the proposed project and **Alternative 3** would allow urban development in areas with potential sources of naturally occurring asbestos. However, Alternative 3 would result in increased population that could be exposed to NOA and therefore this impact would be worse in comparison to the proposed project.

Construction CO Emissions (Impact 4.5.5)

The General Plan update and its associated project components includes land use designations that would allow for future construction of residential, commercial, industrial, and other projects. This will result in construction-related emissions from future projects that would generally be short-term in duration, but may still cause adverse air quality impacts. Inhalable PM₁₀ is the pollutant of greatest concern associated with construction activities. PM₁₀ emissions can result from construction activities facilitated by the proposed General Plan, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. This is considered a **potentially significant** impact.

Alternative 3 has the capacity to result in 2,896 more housing units in the Planning Area than the proposed project and therefore more potential to result in construction-related emissions from future projects. As such, impacts under Alternative 3 would be **significant and unavoidable** and these impacts would be greater than those of the proposed project.

Conflict or Obstruct with Implementation of Greenhouse Gas Reduction Measures (Impacts 4.5.7)

Implementation of the proposed project and its associated project components would increase emissions of CO2e by 2030 over existing (2008) conditions. This increase in GHG emissions is inconsistent with AB 32's goal of reducing 2020 greenhouse gas emissions to 1990 levels. Table 4.5-11 illustrates that most of these increases are likely to come from increases in housing associated with the city's population growth. These increases would increase the carbon footprint of lone in 2030. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions will further contribute to climate change. Also, the projected growth in the City of Ione could contribute to global increases in temperature that could increase exposure of future development to risk related to significant storm events, sea level rise and flooding resulting from global climate change. The proposed project does include a number of policies that would indirectly help mitigate citywide GHG emissions by reducing activities from several key sources of GHGs, including motor vehicles, water conveyance, waste collection, and energy consumption. However, due to the expected increases in GHG emissions resulting from the growth associated with the proposed project, and since the potential extent and severity of any such risk is speculative, given the unknown nature of potential impacts of climate change on lone, this impact would be significant and unavoidable.

Alternative 3 has the capacity to result in 8,575 more persons and 2,896 more housing units than the proposed project. As discussed above, most of the anticipated GHG increases associated with the proposed project are likely to come from increases in housing associated with the city's population growth. Since this alternative would result in more housing units than the proposed project, it would also result in more GHG emissions than the proposed project. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions associated with Alternative 3 would contribute to climate change to a greater degree than the proposed project and would result in a significant and unavoidable impact.

Noise

Construction Noise Impacts (Impacts 4.6.1 and 4.6.4)

Implementation of the proposed project could result in activities associated with construction could result in elevated noise levels at noise-sensitive land uses. Increases in ambient noise levels, particularly during the nighttime hours, could result in increased levels of annoyance and potential sleep disruption. This impact would be considered **potentially significant**.

Alternative 3 has the capacity to result in 2,896 more housing units than the proposed project. Therefore, Alternative 3 would result in a greater **potentially significant** impact associated with construction related noise resulting from new development than the proposed project.

Project and Cumulative Transportation Noise Impacts (Impacts 4.6.2 and 4.6.5)

Projected future noise contours for major roadways within the city and predicted increases in traffic noise levels associated with future development in the Planning Area are summarized in **Table 4.6-7** and depicted in **Figure 4.6-3** (refer to Impact 4.6-2). Buildout of the Planning Area as

set forth in the proposed project would result in additional traffic along these roadways and result in increased noise. This impact would be **significant and unavoidable** under project and cumulative conditions.

Since implementation of **Alternative 3** would result in increased population and development potential in comparison to the proposed project, traffic noise impacts would remain **significant and unavoidable** and would be worse under this alternative than under the proposed project.

Stationary/Non-Transportation Noise Impacts (Impacts 4.6.3)

Implementation of the proposed project policies and actions would reduce noise associated with new stationary noise sources and the placement of new noise-sensitive land uses over which the city has jurisdiction (e.g., commercial and industrial sites, residential uses). However, some stationary noise impacts cannot be mitigated to a less than significant level due to limitations on the city to control the exact placement of substantial noise-generating uses (e.g., school facilities) in proximity to noise-sensitive land uses (e.g., residential). Accordingly, stationary source noise levels from activities on uses for which the city has limited control could result in noise levels that exceed the city's maximum allowable noise standards. Thus, this impact is considered significant and unavoidable.

Alternative 3 would result in worse noise impacts given that it would also allow for increased future development and population and associated noise impacts. This impact would also be **significant and unavoidable** for Alternative 3.

Biological Resources

Impacts to Special-Status Species (Impact 4.8.1)

Development under the proposed project could potentially cause direct and indirect impacts to approximately 16,746 acres of vegetation types that as occupied or potential habitat for listed species. As the final design and extent of future development is not currently known, the acreages listed in **Table 4.8-8** represent the maximum area that could be directly affected. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 3** encompasses the same Planning Area as the proposed project, it has a similar potential to cause direct and indirect impacts to special-status species. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,358.33 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 fewer acres of land disturbance, which would result in fewer potential impacts to special-status species. Therefore, while this impact would remain **significant** under Alternative 3, it would be better than under the proposed project.

Impacts to Species of Concern and Other Non-Listed Special-Status Species (Impact 4.8.2)

Suitable habitat exists in the Planning Area for unlisted but nonetheless special-status species. These species are designated as a species of concern by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Game (CDFG), and/or listed in the CNPS's online inventory as List 2. Direct impacts to these species would occur for the same reasons and in the same manner as direct and indirect impacts to listed species as identified

and discussed in Impact 4.8.1. **Table 4.8-9** provides information on the acreages of suitable habitat that would be affected by implementation of the proposed project. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 3** encompasses the same Planning Area as the proposed project, it has a similar potential to cause direct and indirect impacts to unlisted species of concern. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,358.33 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 fewer acres of land disturbance, which would result in fewer potential impacts to special-status species. Therefore, while this impact would remain **significant** under Alternative 3, it would be better than under the proposed project.

Impacts to Sensitive Habitats (Impact 4.8.3)

Implementation of the proposed project could result in disturbance, degradation, and removal of up to 147 acres of valley oak woodland, 3,306 acres of blue oak woodland, 322 acres of blue oak foothill pine, and 821 acres of montane hardwood which has a high potential to support vernal pools, a CDFG sensitive habitat. Vernal pools require the surrounding upland habitat to maintain their habitat value and function. Approximately 501.2 acres of wetland and open water habitat would also be in direct conflict with the proposed land use designation (i.e. industrial, residential and other built environment). Implementation of the proposed project could also result in disturbance, degradation, and removal of riparian habitat, and would result in the conversion of farmland that provides habitat to several listed species and impacts are considered significant.

Since **Alternative 3** encompasses the same Planning Area as the proposed project, it has a similar potential to cause impacts to sensitive habitats. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,358.33 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 fewer acres of land disturbance, which would result in fewer potential impacts to special-status species. Therefore, while this impact would remain **significant** under Alternative 3, it would be better than under the proposed project.

Impacts to Migratory Corridors (Impact 4.8.4)

Implementation of the proposed project would interfere substantially with the movement of several special status and common wildlife species. Wildlife movement corridors are routes frequently utilized by wildlife that provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat. This would be a **significant** impact.

Alternative 3 could result in increased habitat degradation due to additional traffic, increased human presence, and degradation of the water quality in comparison to the proposed project. This would be considered a **potentially significant** impact and would be worse under Alternative 3 than under the proposed project.

Cumulative Biological Resource Impacts (Impact 4.8.6)

Implementation of the proposed project could result in the loss of substantial sensitive habitat areas as well as farmland utilized by state and federally listed species that would add to cumulative loss of such habitat. Given the extent of this potential conversion and loss of habitat, this impact is considered **significant and unavoidable**.

As discussed above, **Alternative 3** designates 11,358.33 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 fewer acres of land disturbance, which would result in fewer potential impacts to biological resources. Therefore, while this impact would remain **significant and unavoidable** under Alternative 3, it would be better than under the proposed project.

Cultural and Paleontological Resources

Project and Cumulative Prehistoric and Historic Resource Impacts (Impacts 4.9.1, 4.9.2, 4.9.4, and 4.9.5)

Cumulative development in the region would result in the loss and/or degradation of cultural resources. These cumulative effects of development on cultural resources would be significant. Since most of the Planning Area, particularly outside the city limits has not been surveyed for cultural resources, there is the potential for future development to uncover previously undiscovered cultural resources because of the area's historic occupation by Native Americans, Spanish, and other groups of settlers. Buildout of the Planning Area could contribute to the cumulative loss of cultural resources in the region. The proposed project contains several policies and action items that would mitigate its contribution to this impact. Thus, this impact is potentially significant under project and cumulative conditions.

Since **Alternative 3** encompasses the same Planning Area as the proposed project, it has similar potential for future development to uncover previously undiscovered cultural resources. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,358.33 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 fewer acres of land disturbance, which would result in fewer potential impacts to previously undiscovered cultural resources. Therefore, while this impact would remain **potentially significant** under Alternative 3, it would be better than under the proposed project.

Project and Cumulative Paleontological Resource Impacts (Impacts 4.9.3 and 4.9.6)

A search of the University of California, Berkeley Museum of Paleontology collections database identified only one fossilized plant within the boundaries of the city. The sensitivity of the area for paleontological resources, however, has not been assessed on a parcel by parcel basis, and no formal paleontological investigations were identified for the area. Consequently, implementation of the proposed project could impact undiscovered paleontological resources. This impact is **significant** under project and cumulative conditions. However, the proposed project policies and action items in the Historic and Cultural Resources Element include provisions that would ensure paleontological resources are protected.

Since **Alternative 2** encompasses the same Planning Area as the proposed project, it has similar potential for future development to uncover previously undiscovered paleontological resources. However, although this alternative has greater development and population capacity than the proposed project, it designates 11,358.33 acres of Open Space within the Planning Area as

opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 fewer acres of land disturbance, which would result in fewer potential impacts to previously undiscovered paleontological resources. Therefore, while this impact would remain **potentially significant** under Alternative 3, it would be better than under the proposed project.

Hydrology and Water Quality

Construction, Operation, Groundwater, and Cumulative Water Quality Impacts (Impacts 4.10.1, 4.10.2, and 4.10.3)

Continued compliance with applicable SWRCB statewide water quality permits and the city's Storm Water Quality Management Program would minimize the pollutant load of storm drainage within the Planning Area from development that could be accommodated under the proposed GPU. Implementation of General Plan Update policies would further protect surface and groundwater quality and mitigate the city's contribution to this impact by protecting natural streams and drainages, reducing potential sources of pollutants, and requiring the use of landscaping and other BMPs to prevent pollutants from entering surface and groundwater resources. As such, the city's contribution to cumulative water quality impacts is considered a significant impact under project and cumulative conditions.

Alternative 3 has the capacity to result in 8,575 more persons and 2,896 more housing units than the proposed project. Therefore, this alternative would have increased potential to impact water quality. Development projects under this alternative would also have to comply with SWRCB statewide water quality permits and the city's Storm Water Quality Management Programs. However, Alternative 3 would result in a greater population and more development than the proposed project and would therefore result in greater pollutant loads and storm drainage.

Exposure to Flood Hazards (Impact 4.10.4)

The Planning Area is traversed by several creeks for which 100-year floodplains have been mapped by FEMA or the State of California DWR. Some of the 100-year floodplain area mapping within the Planning Area has only been based on approximate method technical evaluations and does not include detailed information such as base flood (100-year) elevations. In these areas, the possibility of exposing structures and facilities to flood hazards and potential damage as a part of new development is considered to be a **potentially significant** impact.

Alternative 3 has the capacity to result in 8,575 more persons and 2,896 more housing units than the proposed project. Therefore, this alternative would result in greater exposure of persons and development to flooding hazards. Alternative 3 would result in a **potentially significant** impact.

Geology and Soils

Slope Instability and Landslides (Impacts 4.11.3)

Implementation of the proposed project, along with potential development in the Planning Area could result in slope instability near the edges of steep slopes and if temporary or permanent cut and/or fill slopes were made during construction. Therefore, implementation of the proposed project could expose new development within the city limits to hazards associated with slope instability and landslides. This is a **potentially significant** impact.

Alternative 3 would result in similar project impacts related to slope instability. This alternative would also result in **significant** impacts and the extent of this impact would be increased in comparison to the proposed project since this alternative has the capacity to result 8,575 more persons and 2,896 more housing units than the proposed project.

Project and Cumulative Loss of Mineral Resources (Impacts 4.11.5 and 4.11.8)

Current mining operations within the Planning Area are designated as Surface Mining (SM) and are anticipated to continue with mining operations and the extraction of mineral resources. Encroachment of urban uses in adjacent areas could result in conflicts with these mining operations and impacts could be potentially significant. This impact is considered **significant** under project conditions and **significant and unavoidable** under cumulative conditions.

Alternative 3 designates 9,445.7 acres within the Planning Area for Surface Mining, as compared to only 8,199.05 acres designated for Surface Mining by the proposed project. Therefore, this alternative would result in greater potential mining operation conflicts, risks, and the associated **significant and unavoidable** impacts than the proposed project as more land would be utilized for mining operations.

Naturally Occurring Asbestos Impacts (Impact 4.11.6)

Natural asbestos occurs commonly in ultramafic rocks and the presence of ultramafic rocks within a region indicates the possibility of naturally occurring asbestos materials. The proposed GP Planning Area has the potential to contain these sources of naturally occurring asbestos. Since there are no established safe exposure levels for residential areas, public exposure to any amount of asbestos poses a potential health risk. Impacts are therefore **significant**.

Areas within the Planning Area that have the potential to contain sources of naturally occurring asbestos are shown in Figure 4.11-2 in Section 4.11, Geology and Soils. Both the proposed project and **Alternative 3** would allow urban development in areas with potential sources of naturally occurring asbestos. Therefore, Alternative 3 would have a similar **significant** impact as the proposed project.

Visual Resources

Alteration of Visual Character (Impact 4.12.3)

The proposed project policy provisions assist in minimizing visual impacts related to the conversion of agricultural lands to urban uses by adopting and enforcing development design, landscape, and façade maintenance standards, building codes, and community standards, as well as by implementing open space preservation techniques and building design standards. However, given the size of the Planning Area, the proposed project would nevertheless result in a substantial change in visual resources in the Planning Area. There are no feasible mitigation measures available to offset this change in visual resources, as the urban uses proposed under the project are fundamentally different from current farmland uses. Thus, this impact is considered significant and unavoidable.

Although **Alternative 3** has greater development and population capacity than the proposed project, it designates 11,358.33 acres of Open Space within the Planning Area as opposed to only 9,200.47 acres for the proposed project. Therefore, this alternative would result in 2,157.86 more acres of Open Space, which would result in fewer potential impacts to visual resources. Urban development allowed under this alternative would still result in a **significant and**

unavoidable alteration of existing rural and open space characteristics within the Planning Area. However, impacts would be less than those of the proposed project.

Daytime Glare and Nighttime Lighting (Impact 4.12.4)

Implementation of the proposed project would result in the intensification of land uses within the Planning Area, which has the potential to create new sources of daytime glare and nighttime illumination. Thus, impacts are **potentially significant**.

Under **Alternative 3**, would increase daytime glare and nighttime illumination in comparison to the proposed project by allowing increased intensification of land uses in comparison to the proposed project. Urban development allowed under this alternative would still result in a **significant and unavoidable** daytime glare and nighttime illumination impacts within the Planning Area.

Cumulative Visual Resource Impacts (Impact 4.12.5)

Implementation of proposed policies and action items would reduce the proposed project's cumulative impacts on visual resources through the adoption and enforcement of development design standards, landscape and façade maintenance programs, building codes, and community standards, as well as the implementation of open space preservation techniques, building design standards, growth boundary programs, and nighttime lighting controls. However, with implementation of the proposed General Plan, increased development would occur and changes to existing scenic resources would be inevitable. Therefore, this impact is considered significant and unavoidable.

As discussed above, **Alternative 3** would result in 2,157.86 more acres of Open Space within the Planning Area than the proposed project, which would result in fewer potential impacts to visual resources. Urban development allowed under this alternative would still result in a **significant and unavoidable** cumulative alteration of existing rural and open space characteristics within the Planning Area. However, impacts would be less than those of the proposed project.

Public Services and Utilities

Wildland Fire Impacts (Impact 4.13.1.2)

Implementation of the proposed project could result in safety hazards associated with wildland fires in residential, commercial and industrial areas adjacent to open space and natural areas. The Planning Area is located in an area susceptible to risk of wildland fires. The entire County is classified as moderate to very high fire hazard severity based on CALFIRE analysis of fuels, terrain and weather. The rural setting coupled with hot, dry summers, dense clusters of trees as well as dry grasses present the potential for wildland fire. This is considered a **potentially significant** impact.

Alternative 3 has the capacity to result in 8,575 more persons and 2,896 more housing units than the proposed project. Therefore, this alternative would result in greater exposure of persons and development to wildland fire hazards. Therefore, Alternative 3 would result in a worse **potentially significant** impact than the proposed project.

Waste Discharge Requirements (Impact 4.13.4.2)

The lone secondary WWTP is currently operating under Cease and Desist Order No. R5-2003-0108 (CDO). The CDO was adopted by the Central Valley RWQCB due to concerns with the seepage along the southern creek bank of Sutter Creek to the immediate north of the lone secondary WWTP ponds. It was concluded that the seepage amounted to a discharge of WWTP effluent into Sutter Creek. In addition, the Central Valley RWQCB identified that the percolation ponds were potentially impacting the groundwater quality underlying the plant. The proposed project would increase wastewater flows and disposal of these flows into percolation ponds would further exacerbate seepage and groundwater impacts identified in the CDO. This impact is potentially significant.

Alternative 3 would result in increased wastewater flows in comparison to the proposed project given its increased development and population potential as compared to the proposed project. Therefore Alternative 3 would have a greater **potentially significant** impact than under the proposed project.

6.6 ALTERNATIVE 4 – WESTERN IONE ROADWAY IMPROVEMENT STRATEGY SEGMENTS ALTERNATIVE

CHARACTERISTICS

Under this alternative, the proposed City of Ione General Plan Update Land Use Policy Map would be modified by including different alignment alternatives for the Western Ione Roadway Improvement Strategy or WIRIS (see **Figure 6.0-4**). These include segment alignments (A-1. F-1, G-1. G-2A, G-2B, G-4 and H-1) that were considered but not selected while the proposed conceptual WIRIS alignment was being developed. All policy provisions of the proposed project would remain as they are currently proposed. At buildout, this alternative would consist of a population of 18,182 person, 7,475 dwelling units, and 12,800 jobs. The WIRIS improvements are a combination of roadway improvements and the construction of new roadways with the primary purpose of routing truck and heavy vehicular traffic away from the downtown core and onto SR 124 and 104.

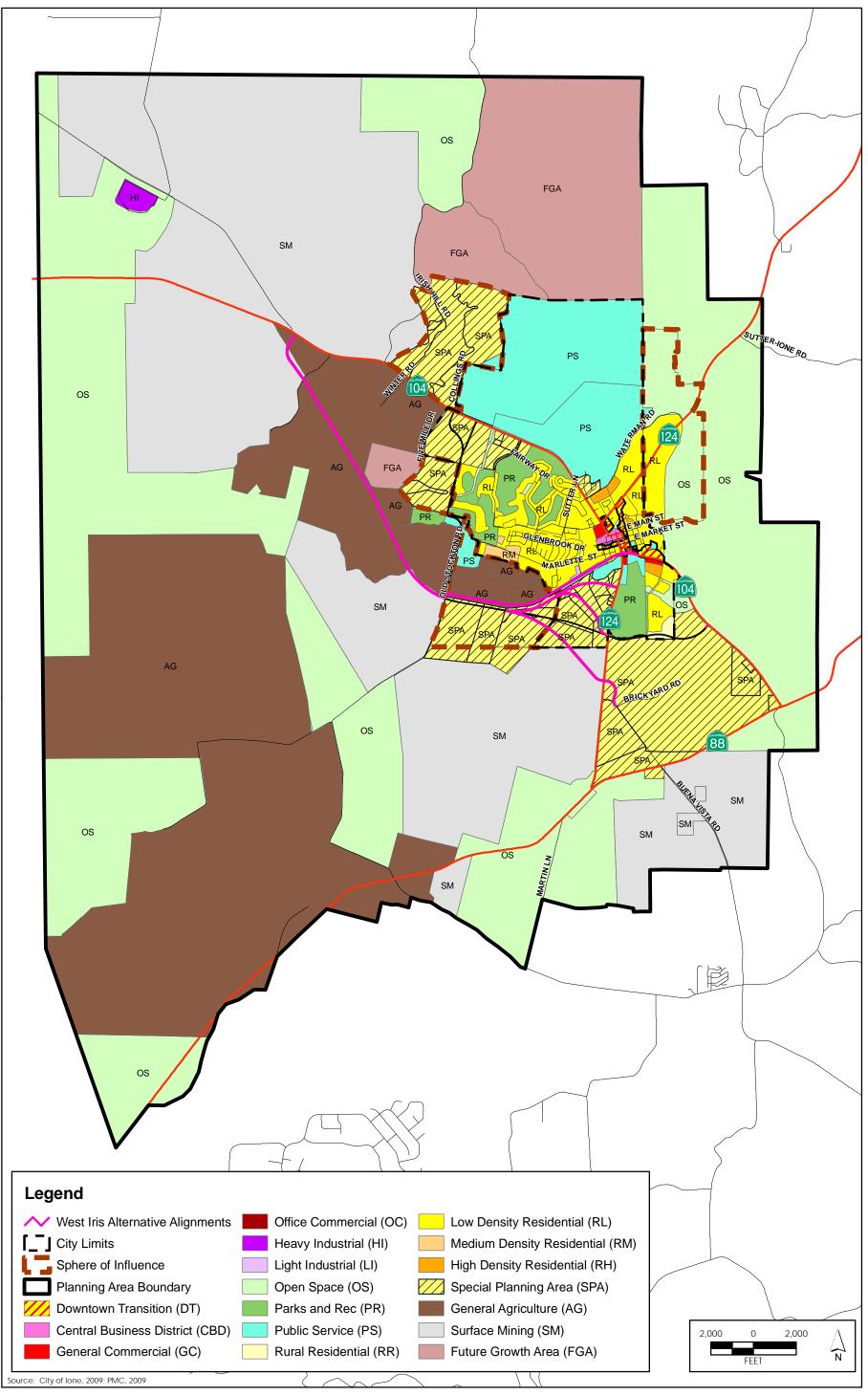




Figure 6.0-4 Alternative 4

ENVIRONMENTAL ANALYSIS

The following analysis is based on the significant environmental impacts identified in Sections 4.1 through 4.13.

COMPARATIVE ANALYSIS

Land Use Incompatibilities (Impact 4.1.2)

The proposed General Plan Land Use Map was developed with the intent to designate areas for the most appropriate type of land use based on existing land uses, the existing and planned circulation system, the specific needs of lone, environmental constraints, and other factors. Land use designations in the existing city limits are largely unchanged (from the 1982 General Plan Land Use Map). Most of the areas in the city do not have areas of significant potential land use incompatibility. As such, implementation of the proposed Land Use Map would not be expected to result in many significant land use incompatibilities since the proposed GP policies contain language that would assist in mitigating any potential impacts. Areas that could pose potential land use incompatibility include locating residential development such as Castle Oaks and Special Planning Areas (Castle Oaks Gateway, Ringer Ranch, Preston Reuse and 124 Corridor) adjacent to the Mule Creek State Prison and CALFIRE facilities. Therefore this impact is identified as **potentially significant**.

Alternative 4 utilizes alignment segments that would impact more intensive land uses than the preferred WIRIS alignment. This alternative would result in the conversion of land uses designated as Parks and Recreation (PR) under the proposed General Plan Land Use Map, particularly along the C, D, E, portions of the alignment, and the conversion of Low Density Residential (RL) and Central Business District (CBD) along alignment segments G-1, G-2A, and H-1. Therefore impacts associated with Alternative 4 would remain **potentially significant** and would be worse than the proposed project

<u>Project and Cumulative Consistency Impacts with Relevant Land Use Planning Documents (Impacts 4.1.3 and 4.1.4)</u>

The more intensive land use patterns within the Planning Area under the proposed project would contribute to the environmental effects of growth anticipated to occur in the region in the foreseeable future. The proposed project would increase the existing General Plan Planning Area by approximately 28,009.75 acres and would accommodate a larger population and employment base within the Planning Area through the intensification of development. The proposed project would also designate more land for open space as compared to the existing County General Plan, and the proposed land use pattern and development intensity would substantially contribute to the conversion of land in the region to more urban uses through the designation of currently vacant lands for residential, mixed-use, commercial, and industrial development, and roadway improvement projects including the West lone Roadway Improvement Strategy (WIRIS). The significant environmental effects of such conversions are discussed and analyzed in greater detail in the various sections of this Draft EIR that relate specifically to those particular issue areas (see Section 4.2 through 4.13). This impact is identified as significant and unavoidable under project and cumulative conditions.

Alternative 4 would allow for similar intensification of land use patterns to the proposed project as it does not reduce the size of the Planning Area or change proposed land uses other than the WIRIS alignment. Therefore, this impact would remain significant and unavoidable and impacts would be similar to the proposed project.

Agricultural Resources

Project and Cumulative Loss and Conversion of Agricultural Lands (Impacts 4.2.1 and 4.2.4)

Implementation of the proposed project Land Use Map would designate a total of 293.10 acres of Important Farmland (62.67 acres Prime Farmland + 1.35 acres Unique Farmland + 13.67 acres Farmland of Statewide Importance + 215.41 acres Farmland of Local Importance) within the Planning Area for urban uses. This impact is **significant and unavoidable** under project and cumulative conditions.

Alternative 4 would allow for similar intensification of land use patterns to the proposed project as it does not reduce the size of the Planning Area or change proposed land uses other than the WIRIS alignment. Therefore impacts would remain **potentially significant** and would be similar to the proposed project.

Agricultural/Urban Interface Conflicts (Impact 4.2.2)

Implementation of the proposed project Land Use Map would place urbanized land uses adjacent to agricultural uses and would replace existing agricultural uses. It is anticipated that as the city builds out, new agriculture/urban interface conflicts may occur, particularly in the areas outside the city limits. This impact is identified as **significant and unavoidable**.

Alternative 4 is anticipated to occur in the same areas within the proposed General Plan Planning Area. However, this alternative would have greater impacts with agricultural/urban interface conflicts as segments for Alternative 4 traverse areas designated for agricultural uses, particularly portions of segments E, F-1 and G-1. The impacts under this alternative are considered **significant and unavoidable** and are worse than those of the proposed project.

Agricultural Zoned Lands and Williamson Act Contract Conflicts (Impact 4.2.3)

The Planning Area contains approximately 5,077.47 acres currently under a Williamson Act contract and in non-renewal status. However, none of this land is located within the existing city limits, but is in those portions of the Planning Area that lie outside the city limits. Most of this land is designated to as either General Agriculture (AG) or Open Space (OS), thereby allowing these lands to continue in agricultural operation. However, portions of three parcels within the Triangle Planning Area totaling 91.09 acres would be allowed to develop with various types of urban uses. This potential for development would be in violation of Williamson Act contracts and therefore this impact is considered to be **potentially significant**.

Portions of alignment segments D and E under **Alternative 4** have the potential to result in the conversion of small areas of land under Williamson Act contracts. Therefore the impact is similar to the proposed project and remains **potentially significant**.

Population and Housing

Project and Cumulative Population, Housing and Employment Increases (Impacts 4.3.1 and 4.3.4)

Development under the proposed project and its associated project components would lead to an increase in population and employment. To be exact, the Planning Area is expected to be developed with about 7,475 new housing units and the city's population would increase to about 18,182 persons. In addition, the Planning Area is projected to have a total of approximately 12,800 jobs in various industries after implementation of the project. Development and growth in the city, as a result of the implementation of the proposed project, would contribute to cumulative population and housing conditions in the unincorporated areas of Amador County, as well as in surrounding cities and counties. This impact is identified as significant and unavoidable under project and cumulative conditions.

Alternative 4 by itself would not result in the need for increased housing or increase population. This alternative proposes different alignment segments from that under the preferred WIRIS alignment. However, implementation of Alternative 4 would also result in a population of 18,182 person, 7,475 dwelling units, and 12,800 jobs within the Planning Area. Therefore, impacts are similar to the proposed project and remain **significant and unavoidable**.

Jobs/Housing Balance Impact 4.3.3)

Implementation of the proposed project is anticipated to have the capacity for up to 12,800 jobs and approximately 7,475 housing units. This would result in a jobs-per-housing ratio of 1.7. It is generally considered ideal to have approximately one job per housing unit in a jurisdiction. A ratio of 1.7 therefore indicates that the Planning Area would have substantially more jobs than housing. This could potentially result in attracting substantial numbers of workers from outside the Planning Area, thereby resulting in increases in traffic congestion, air emissions, and mobile-source noise. This impact is considered **significant**.

Since all project components of the proposed project other than the WIRIS alignment remain the same under **Alternative 4**, the jobs/housing balance would be impacted similarly to the proposed project. Therefore, the impact would remain significant.

Transportation and Circulation

Project and Cumulative Roadway Segment and Freeway Impacts (Impacts 4.4.1 and 4.4.5)

Implementation of the proposed project would provide service levels consistent with the city's LOS "D" standard with few exceptions. The proposed project would result in LOS F within the General Plan planning horizon on:

- SR 104 between Sutter Lane and SR 124 North
- SR 104 between SR 124 North and F Main Street
- SR 104 between SR 124 South and Foothills Blvd
- SR 124 between E Main Street and Washington Street
- SR 124 between Washington Street and WIRIS
- SR 124 between WIRIS and Buena Vista Road

With full development of the Planning Area and regional growth in traffic, these impacts are anticipated to worsen. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Portions of alignment segments G-1, G-2A, and H-1 are proposed to align through areas of the Planning Area designated as Low Density Residential (RL) and Central Business District (CBD). This has the potential to worsen traffic impacts, particularly in the CBD area. Therefore the impact under **Alternative 4** is similar to the proposed project and is considered **significant and unavoidable**.

Project and Cumulative Transit System Impacts (Impact 4.4.3)

Implementation of the proposed project would result in an increase in the demand for public transit service. While Amador Regional Transit (ARTs) currently provides six in-bound and outbound trips per day to Sutter Hill and Buena Vista/Comanche, the growth of the city may eventually require greater decreased headway, additional busses, or additional bus stops. The growth in the population and employment sector proposed by the General Plan may increase ridership beyond what is available or planned. Therefore, future unmet transit demand in lone is a **potentially significant** impact.

Since **Alternative 4** only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, Alternative 4 would have similar increases in demand for public services and conflicts with the level of service that could be provided by ART similarly to the proposed project. This impact therefore remains **potentially significant**.

Air Quality

Project and Cumulative Impacts on Air Attainment Plans (Impacts 4.5.1 and 4.5.6)

Population growth and the development potential under the proposed project could emit non-attainment pollutants within Amador County that could challenge the region's ability to meet ozone and PM standards. **Tables 4.5-5** and **4.5.-6** indicate the levels of emissions from vehicles and electricity and natural gas use, associated with residential heating in the winter, landscaping activities, etc. Since a General Plan's impacts on cumulative air quality in a region is determined by its consistency with applicable attainment plans, and since there are currently no ozone attainment plans for Amador County, this impact is considered **significant and unavoidable** under project and cumulative conditions.

Without an ozone attainment plan for the region, **Alternative 4** too would result in impacts that are **significant and unavoidable**.

Odor Emissions (Impact 4.5.3)

Implementation of the proposed project has the potential to allow for several types of project that could locate sensitive receptors near existing and future sources of objectionable odors. In addition, future construction activities could result in odorous emissions from diesel exhaust associated with construction equipment. Thus, this impact is **potentially significant**.

Since **Alternative 4** includes the same Planning Area as that of the proposed project and only proposes conceptual alternate roadway alignments for the WIRIS, and all other development capacity and projected population increases remain the same, implementation of Alternative 4 would have a similar potential to include land uses that may produce odorous emissions or may allow for the construction of sensitive land uses near existing or future sources or odorous emissions. This impact could be mitigated similar to the proposed General Plan with the proposed policies and mitigation measures identified in Section 4.5, Air Quality. However,

Alternative 4 would still result in a population that could be exposed to objectionable odors and therefore this impact would remain **potentially significant**.

Expose Sensitive Receptors to Toxic Air Contaminants (TACs) (Impact 4.5.4)

Trenching, grading, and other excavations associated with future development under the proposed project could expose zones of asbestos-containing rock and possibly cause airborne releases of fibrous minerals in areas containing ultramafic rocks or potentially in areas containing undivided Mesozoic volcanic and metavolcanic rocks. Therefore, implementation of the proposed General Plan Land Use Map could result in releases of, and exposure to, NOA. This is a significant impact.

Since **Alternative 4** only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, Alternative 4 would involve trenching, grading, and other excavations could expose zones of asbestos-containing rock and possibly cause airborne releases of fibrous minerals in areas containing ultramafic rocks or potentially in areas containing undivided Mesozoic volcanic and metavolcanic rocks. Therefore, this impact would be similar to the proposed project and would remain significant.

Construction CO Emissions (Impact 4.5.5)

The General Plan update and its associated project components includes land use designations that would allow for future construction of residential, commercial, industrial, and other projects. This will result in construction-related emissions from future projects that would generally be short-term in duration, but may still cause adverse air quality impacts. Inhalable PM₁₀ is the pollutant of greatest concern associated with construction activities. PM₁₀ emissions can result from construction activities facilitated by the proposed General Plan, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. This is considered a **potentially significant** impact.

Alternative 4 would require development under the existing General Plan to comply with AAPCD requirements. However, given that the Planning Area, and therefore the development capacity, population increases, increases in traffic remain similar under this alternative as the proposed project, Alternative 4 would also allow for increases in construction related activities as the proposed project and would result in the same **potentially significant** impact.

Conflict or Obstruct with Implementation of Greenhouse Gas Reduction Measures (Impacts 4.5.7)

Implementation of the proposed project and its associated project components would increase emissions of CO2e by 2030 over existing (2008) conditions. This increase in GHG emissions is inconsistent with AB 32's goal of reducing 2020 greenhouse gas emissions to 1990 levels. Table 4.5-11 illustrates that most of these increases are likely to come from increases in housing associated with the city's population growth. These increases would increase the carbon footprint of Ione in 2030. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions will further contribute to climate change. Also, the projected growth in the City of Ione could contribute to global increases in temperature that could increase exposure of future development to risk related to significant storm events, sea level rise and flooding resulting from global climate change. The proposed project does include a number of policies that would

indirectly help mitigate citywide GHG emissions by reducing activities from several key sources of GHGs, including motor vehicles, water conveyance, waste collection, and energy consumption. However, due to the expected increases in GHG emissions resulting from the growth associated with the proposed project, and since the potential extent and severity of any such risk is speculative, given the unknown nature of potential impacts of climate change on lone, this impact would be **significant and unavoidable**.

Implementation of **Alternative 4** would include land uses that may increase emissions of CO2e by 2030 over existing (2008) conditions. As with the proposed project, increase in GHG emissions under Alternative 4 would be inconsistent with AB 32's goal of reducing 2020 greenhouse gas emissions to 1990 levels and projected growth would contribute to project and cumulative impacts on global climate change. Therefore this impact is similar to the proposed project and would remain **significant and unavoidable**.

Noise

Construction Noise Impacts (Impacts 4.6.1 and 4.6.4)

Implementation of the proposed project could result in activities associated with construction could result in elevated noise levels at noise-sensitive land uses. Increases in ambient noise levels, particularly during the nighttime hours, could result in increased levels of annoyance and potential sleep disruption. This impact would be considered **potentially significant**.

Since **Alternative 4** only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the boundary and size of the Planning Area at 31,769.65 acres, Alternative 4 would result in a similar **potentially significant** impact with construction-related noise resulting from new development.

Project and Cumulative Transportation Noise Impacts (Impacts 4.6.2 and 4.6.5)

Projected future noise contours for major roadways within the city and predicted increases in traffic noise levels associated with future development in the Planning Area are summarized in **Table 4.6-7** and depicted in **Figure 4.6-3** (refer to Impact 4.6-2). Buildout of the Planning Area as set forth in the proposed project would result in additional traffic along these roadways and result in increased noise. This impact would be **significant and unavoidable** under project and cumulative conditions.

Alternative 4 only proposes alternate roadway alignments for the WIRIS while the Planning Area and all other development capacity and projected population increases remain the same as that for the proposed project. Similarly, buildout of the Alternative 4 Planning Area would result in additional traffic and thus transportation noise along these roadways. Therefore, this impact would be similar to the proposed project and would remain **significant and unavoidable**.

Stationary/Non-Transportation Noise Impacts (Impacts 4.6.3)

Implementation of the proposed project policies and actions would reduce noise associated with new stationary noise sources and the placement of new noise-sensitive land uses over which the city has jurisdiction (e.g., commercial and industrial sites, residential uses). However, some stationary noise impacts cannot be mitigated to a less than significant level due to limitations on the city to control the exact placement of substantial noise-generating uses (e.g., school facilities) in proximity to noise-sensitive land uses (e.g., residential). Accordingly, stationary source noise levels from activities on uses for which the city has limited control could

result in noise levels that exceed the city's maximum allowable noise standards. Thus, this impact is considered **significant and unavoidable**.

Alternative 4 only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the same Planning Area at 31,769.65 acres. Therefore Alternative 4 would have similar noise impacts given that this alternative would also allow for future development and associated noise impacts. This impact from stationary and non-stationary noise sources would remain **significant and unavoidable**.

Biological Resources

Impacts to Special-Status Species (Impact 4.8.1)

Development under the proposed project could potentially cause direct and indirect impacts to approximately 16,746 acres of vegetation types that are occupied or potential habitat for listed species. As the final design and extent of future development is not currently known, the acreages listed in **Table 4.8-8** in Section 4.8, Biological Resources, represent the maximum area that could be directly affected. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Special-status species and habitat surveys were conducted at a program level for the proposed project. Since **Alternative 4** includes the same Planning Area as that of the proposed project and only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same, this alternative has the same potential as that for the proposed project to impact the habitat of special-status species. Impacts are therefore **significant**.

Impacts to Species of Concern and Other Non-Listed Special-Status Species (Impact 4.8.2)

Suitable habitat exists in the Planning Area for unlisted but nonetheless special-status species. These species are designated as a species of concern by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Game (CDFG), and/or listed in the CNPS's online inventory as List 2. Direct impacts to these species would occur for the same reasons and in the same manner as direct and indirect impacts to listed species as identified and discussed in Impact 4.8.1. **Table 4.8-9** in Section 4.8, Biological Resources, provides information on the acreages of suitable habitat that would be affected by implementation of the proposed project. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Research on unlisted special-status species and potential areas of habitat were conducted at a program level for the proposed project. Since **Alternative 4** includes the same Planning Area as that of the proposed project and only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same, this alternative has the same potential as that for the proposed project to impact the habitat of non-listed special-status species. Impacts are therefore **significant**.

Impacts to Sensitive Habitats (Impact 4.8.3)

Implementation of the proposed project could result in disturbance, degradation, and removal of up to 147 acres of valley oak woodland, 3,306 acres of blue oak woodland, 322 acres of blue oak foothill pine, and 821 acres of montane hardwood which has a high potential to support vernal pools, a CDFG sensitive habitat. Vernal pools require the surrounding upland habitat to maintain their habitat value and function. Approximately 501.2 acres of wetland and open water habitat would also be in direct conflict with the proposed land use designation (i.e. industrial, residential and other built environment). Implementation of the proposed project could also result in disturbance, degradation, and removal of riparian habitat, and would result in the conversion of farmland that provides habitat to several listed species and impacts are considered significant.

Since **Alternative 4** includes the same Planning Area as that of the proposed project and only proposes conceptual alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same, this alternative has the same potential as that for the proposed project to impact sensitive habitats. Implementation of this alternative could also result in disturbance, degradation, and removal of riparian habitat, and would result in the conversion of farmland that provides habitat to several listed species and impacts are considered **significant**.

Impacts to Migratory Corridors (Impact 4.8.4)

Implementation of the proposed project would interfere substantially with the movement of several special status and common wildlife species. Wildlife movement corridors are routes frequently utilized by wildlife that provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat. This would be a **significant** impact.

Alternative 4 includes the same Planning Area as that of the proposed project and only proposes conceptual alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same. Implementation of this alternative also has the potential to substantially interfere with the movement of several special status and common wildlife species, resulting in **significant** impacts.

Cumulative Biological Resource Impacts (Impact 4.8.6)

Implementation of the proposed project could result in the loss of substantial sensitive habitat areas as well as farmland utilized by state and federally listed species that would add to cumulative loss of such habitat. Given the extent of this potential conversion and loss of habitat, this impact is considered **significant and unavoidable**.

Since **Alternative 4** includes the same Planning Area as that of the proposed project and only proposes conceptual alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same, this alternative has the same potential as that for the proposed project to result in cumulative loss of habitat. This impact therefore remains **significant and unavoidable**.

Cultural and Paleontological Resources

<u>Project and Cumulative Prehistoric and Historic Resource Impacts (Impacts 4.9.1, 4.9.2, 4.9.4, and 4.9.5)</u>

Cumulative development in the region would result in the loss and/or degradation of cultural resources. These cumulative effects of development on cultural resources would be significant. Since most of the Planning Area, particularly outside the city limits has not been surveyed for cultural resources, there is the potential for future development to uncover previously undiscovered cultural resources because of the area's historic occupation by Native Americans, Spanish, and other groups of settlers. Buildout of the Planning Area could contribute to the cumulative loss of cultural resources in the region. Thus, this impact is **potentially significant** under project and cumulative conditions.

Alternative 4 includes the same Planning Area as that of the proposed project and only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same. Therefore this alternative would also result in **potentially significant** impacts to prehistoric and historic resources and impacts would be similar to the proposed project.

Project and Cumulative Paleontological Resource Impacts (Impacts 4.9.3 and 4.9.6)

A search of the University of California, Berkeley Museum of Paleontology collections database identified only one fossilized plant within the boundaries of the city. The sensitivity of the area for paleontological resources, however, has not been assessed on a parcel by parcel basis, and no formal paleontological investigations were identified for the area. Consequently, implementation of the proposed project could impact undiscovered paleontological resources. This impact is **significant** under project and cumulative conditions. However, the proposed project policies and action items in the Historic and Cultural Resources Element include provisions that would ensure paleontological resources are protected.

Since **Alternative 4** encompasses the same Planning Area and only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same, this alternative would result in the same **potentially significant** impacts to paleontological resources as the proposed project.

Hydrology and Water Quality

Construction, Operation, Groundwater, and Cumulative Water Quality Impacts (Impacts 4.10.1, 4.10.2, and 4.10.3)

Continued compliance with applicable SWRCB statewide water quality permits and the city's Storm Water Quality Management Program would minimize the pollutant load of storm drainage within the Planning Area from development that could be accommodated under the proposed GPU. Implementation of General Plan Update policies would further protect surface and groundwater quality and mitigate the city's contribution to this impact by protecting natural streams and drainages, reducing potential sources of pollutants, and requiring the use of landscaping and other BMPs to prevent pollutants from entering surface and groundwater resources. As such, the city's contribution to cumulative water quality impacts is considered a significant impact under project and cumulative conditions.

Since **Alternative 4** encompasses the same Planning Area and only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same, this alternative would also result in a similar **significant** impact as the proposed project and would also have to comply with SWRCB statewide water quality permits and the city's Storm Water Quality Management Programs.

Exposure to Flood Hazards (Impact 4.10.4)

The Planning Area is traversed by several creeks for which 100-year floodplains have been mapped by FEMA or the State of California DWR. Some of the 100-year floodplain area mapping within the Planning Area has only been based on approximate method technical evaluations and does not include detailed information such as base flood (100-year) elevations. In these areas, the possibility of exposing structures and facilities to flood hazards and potential damage as a part of new development is considered to be a **potentially significant** impact.

Alternative 4 only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the same Planning Area at 31,769.65 acres. Therefore, since this alternative would potentially expose structures and facilities to flood hazards and damage as a part of new development, this alternative would result in a similar **potentially significant** impact as the proposed project.

Geology and Soils

Slope Instability and Landslides (Impacts 4.11.3)

Implementation of the proposed project, along with potential development in the Planning Area could result in slope instability near the edges of steep slopes and if temporary or permanent cut and/or fill slopes were made during construction. Therefore, implementation of the proposed project could expose new development within the city limits to hazards associated with slope instability and landslides. This is a **potentially significant** impact.

Alternative 4 would result in similar project impacts related to slope instability since Alternative 4 only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the same Planning Area at 31,769.65 acres. Therefore, this alternative would result in similar **significant** impacts.

Project and Cumulative Loss of Mineral Resources (Impacts 4.11.5 and 4.11.8)

Current mining operations within the Planning Area are designated as Surface Mining (SM) and are anticipated to continue with mining operations and the extraction of mineral resources. Encroachment of urban uses in adjacent areas could result in conflicts with these mining operations and impacts could be potentially significant. This impact is considered **significant** under project conditions and **significant and unavoidable** under cumulative conditions.

Alternative 4 only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the same Planning Area at 31,769.65 acres. Therefore this alternative would also result in potential mining operation conflicts, risks, and the associated **significant and unavoidable** impacts.

Naturally Occurring Asbestos Impacts (Impact 4.11.6)

Natural asbestos occurs commonly in ultramafic rocks and the presence of ultramafic rocks within a region indicates the possibility of naturally occurring asbestos materials. The proposed General Plan Planning Area has the potential to contain these sources of naturally occurring asbestos. Since there are no established safe exposure levels for residential areas, public exposure to any amount of asbestos poses a potential health risk. Impacts are therefore significant.

Alternative 4 includes the same Planning Area as that of the proposed project and only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same. Therefore this alternative has the same potential as that for the proposed project to expose sources of naturally occurring asbestos. Impacts are therefore **significant**.

Visual Resources

Alteration of Visual Character (Impact 4.12.3)

The proposed project policy provisions assist in minimizing visual impacts related to the conversion of agricultural lands to urban uses by adopting and enforcing development design, landscape, and façade maintenance standards, building codes, and community standards, as well as by implementing open space preservation techniques and building design standards. However, given the size of the Planning Area, the proposed project would nevertheless result in a substantial change in visual resources in the Planning Area. There are no feasible mitigation measures available to offset this change in visual resources, as the urban uses proposed under the project are fundamentally different from current farmland uses. Thus, this impact is considered significant and unavoidable.

Since **Alternative 4** only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the boundaries and size of the Planning Area at 31,769.65 acres, Alternative 4 would have similar visual impacts by converting less land from agricultural to intense urban uses, urban development allowed under this alternative would still result in significant alteration of existing rural and open space characteristics within the Planning Area. This impact would also be **significant and unavoidable** for Alternative 4.

Daytime Glare and Nighttime Lighting (Impact 4.12.4)

Implementation of the proposed project would result in the intensification of land uses within the Planning Area, which has the potential to create new sources of daytime glare and nighttime illumination. Thus, impacts are **potentially significant**.

Alternative 4 only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, including the same Planning Area at 31,769.65 acres. Therefore impacts to daytime glare and nighttime lighting would remain **potentially significant** under Alternative 4.

Cumulative Visual Resource Impacts (Impact 4.12.5)

Implementation of proposed policies and action items would reduce the proposed project's cumulative impacts on visual resources through the adoption and enforcement of development

design standards, landscape and façade maintenance programs, building codes, and community standards, as well as the implementation of open space preservation techniques, building design standards, growth boundary programs, and nighttime lighting controls. However, with implementation of the proposed General Plan, increased development would occur and changes to existing scenic resources would be inevitable. Therefore, this impact is considered significant and unavoidable.

Since **Alternative 4** only proposes alternate roadway alignments for the WIRIS while all other development capacity and projected population increases remain the same as that for the proposed project, Alternative 4 would have similar cumulative visual resources impacts as the proposed project and those impacts would be considered **significant and unavoidable**.

Public Services and Utilities

Wildland Fire Impacts (Impact 4.13.1.2)

Implementation of the proposed project could result in safety hazards associated with wildland fires in residential, commercial and industrial areas adjacent to open space and natural areas. The Planning Area is located in an area susceptible to risk of wildland fires. The entire County is classified as moderate to very high fire hazard severity based on CALFIRE analysis of fuels, terrain and weather. The rural setting coupled with hot, dry summers, dense clusters of trees as well as dry grasses present the potential for wildland fire. This is considered a **potentially significant** impact.

Since **Alternative 4** encompasses the same Planning Area and has the same development capacity as the proposed project, this alternative would result in similar wildfire impacts to the proposed project and this impact would be considered **potentially significant**.

Waste Discharge Requirements (Impact 4.13.4.2)

The lone secondary WWTP is currently operating under Cease and Desist Order No. R5-2003-0108 (CDO). The CDO was adopted by the Central Valley RWQCB due to concerns with the seepage along the southern creek bank of Sutter Creek to the immediate north of the lone secondary WWTP ponds. It was concluded that the seepage amounted to a discharge of WWTP effluent into Sutter Creek. In addition, the Central Valley RWQCB identified that the percolation ponds were potentially impacting the groundwater quality underlying the plant. The proposed project would increase wastewater flows and disposal of these flows into percolation ponds would further exacerbate seepage and groundwater impacts identified in the CDO. This impact is potentially significant.

Since **Alternative 4** encompasses the same Planning Area and has the same development capacity as the proposed project, it would not result in similar increases in wastewater flows as the proposed project. Therefore, impacts remain **significant and unavoidable**.

6.7 ALTERNATIVE 5 – Q RANCH INCREASED DENSITY ALTERNATIVE

CHARACTERISTICS

Under this alternative, the proposed City of Ione General Plan Update Land Use Policy Map would be modified for an alternate configuration for the boundary and conceptual land use plan for the Q Ranch Policy Area, which is to be developed with 850 units. This alternative includes the following key differences from the version explored in the project:

- Removal of 13.7± acres west of Irish Hill Road in the northwestern corner of the Policy Area and removal of the same area from the city's Sphere of Influence; and
- Addition of 57.3± acres east of Irish Hill Road in the southwestern corner of the Policy Area and addition of the same area to the city's Sphere of Influence (SOI).

This alternative land use plan calls for the same maximum development potential of 850 dwelling units as identified in the proposed project. The conceptual land use plan is substantially the same as the project, except that in the addition area, Open Space and Low Density Residential land uses are proposed. Additionally, the Medium Density Residential (RM) area could be either Low Density Residential or Medium Density Residential.

Figure 6.0-5 describes the alternative conceptual land use plan.

Policy Details of Q Ranch Alternative

The alternative Q Ranch Policy Area is located north along State Route (SR) 104. The Policy Area is approximately 482 acres in size. Collins Road forms most of its eastern boundary; Irish Hill Road forms the western boundary. Immediately east of Q Ranch is Mule Creek State Prison. To the west of the Policy Area are historic mining operations, and to the north is Future Growth Area. The Policy Area is located outside the city limits but within the SOI.

The Q Ranch Policy Area is designated Special Planning Area (SPA). The Policy Area has slopes, although almost all of the Policy Area is sloped less than 30 percent. Dry Creek runs through the Policy Area, generally in the north-south direction. Several ponds are located on the site, north of the end of Collins Road. A significant portion of the site falls within a 100-year floodplain, extending out on both sides of Dry Creek. There are many oak trees within the Policy Area. Portions of the site have been used for grazing and agricultural operations, with one area of the site having undergone voluntary clean-up of contaminated soil.

Due to Q Ranch's location along State Route 104 northwest of Downtown Ione, the Policy Area serves as a gateway to the city and is one of the first areas that residents and visitors see as they enter the city from the north and west. The area across SR 104 from Q Ranch is agricultural and is designated for continued agricultural uses in the General Plan update, much of it being Prime Farmland and Farmland of Statewide Importance. Combined, this stretch of State Route 104 serves as a visual corridor and gateway to Ione.

The land use policy and vision for the Q Ranch Policy Area allows for clustered residential development, the creation of public open space and maintenance of agriculture within the floodplain areas and usable agricultural sites, and the provision of parkland and other public amenities on site. The residential development pattern is required to be consistent with the Conceptual Land Use Plan and maximum unit count of 850 units, with flexibility in the density to allow for clustering of units as clustering may be necessary to avoid site constraints.

Future land planning, either as a Specific Plan or Planned Development Master Plan, is necessary in order to develop the Policy Area, and Sphere of Influence Amendment and annexation is required. Any Specific Plan or Planned Development Master Plan for this site is required to be substantially consistent with the Conceptual Land Use Plan for the Q Ranch Policy Area. The land use plan is required to recognize the impact of development proximate to Dry Creek through the use of an open space preserve and/or additional development setbacks and is required to provide for easy public access to open space around Dry Creek and around ponds within the Policy Area, and accommodate a trail along the creek area for pedestrians, bicycles,

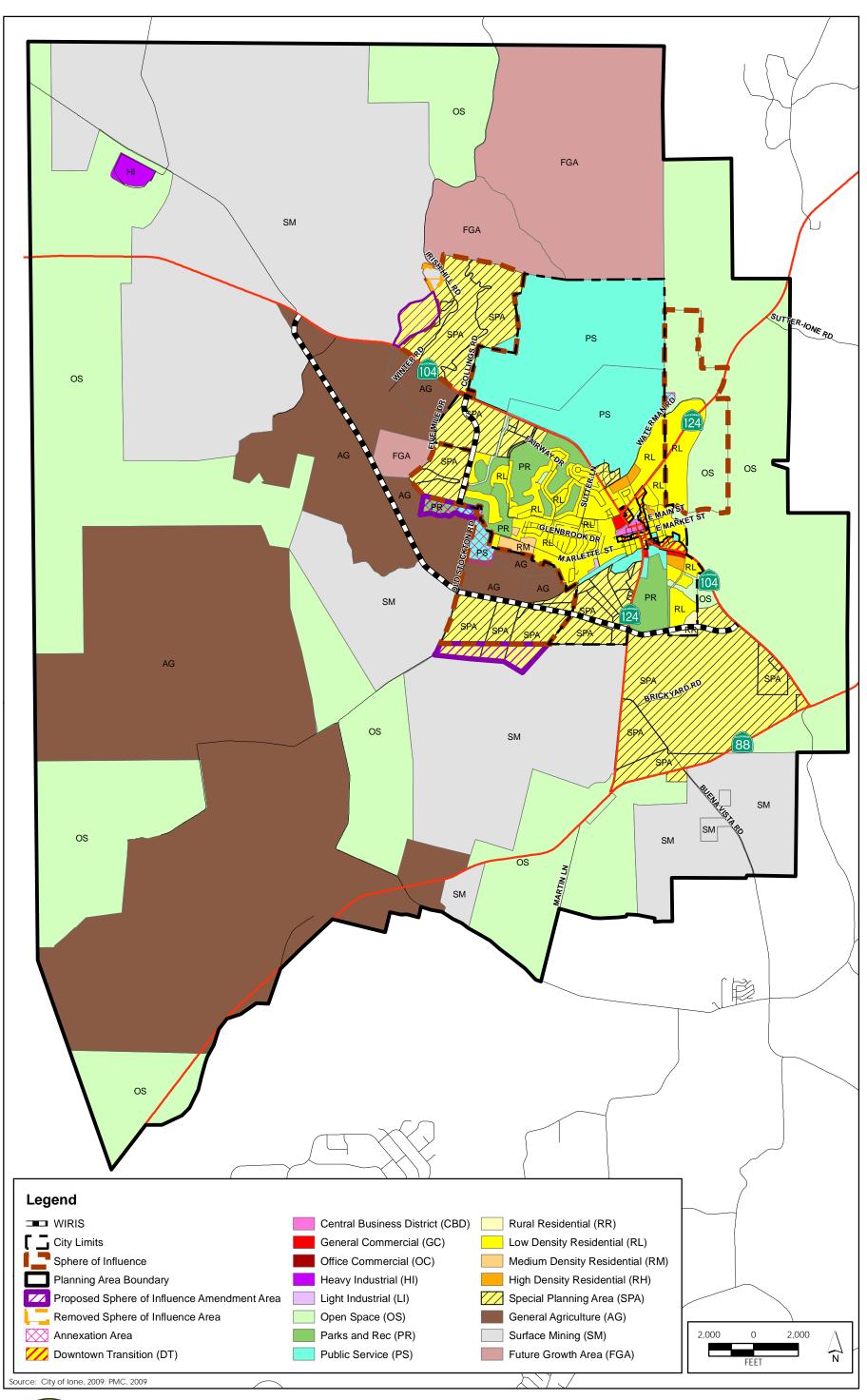
and equestrian use. Future planning would provide linkages, to the extent possible, between the Dry Creek trail and open space and the Mule Creek trail and open space in the vicinity of the Ringer Ranch Policy Area.

The land plan is required to protect heritage trees within the Policy Area pursuant to the city's tree preservation ordinance.

The land use plan is required to recognize the proximity to existing agricultural operations on Q Ranch, historic mining operations to the west, and Mule Creek State prison to the east, that are identified in the General Plan as continued operations in perpetuity, through decreases in development density and intensity, special setbacks, and/or notifications in subsequent property deeds about the proximity of these uses and operations and the right of these operations to continue. The land plan is also required to recognize the proximity to future General Commercial uses along State Route 104 at Collins Road to the east of Q Ranch.

The land plan will be subject to a visual analysis and is required to protect the scenic views offered by Q Ranch from SR 104 by situating development in a manner that least impacts the viewshed wherever possible, and providing a visual buffer setback from SR 104. Future study of the floodplain may change the FEMA approved boundaries of the 100-year floodplain. Such changes may be allowed through the plan review process, however while these changes may increase the developable area, they are not allowed, in and of themselves, to increase the development capacity of the Policy Area beyond the maximum 850 units.

Alternative 5 includes the removal of 13.7± acres west of Irish Hill Road in the northwestern corner of the Policy Area, which would also remove it from the city's Sphere of Influence (SOI); and the addition of 57.3± acres east of Irish Hill Road in the southwestern corner of the Policy Area, which in turn adds this area into the city's SOI (see **Figure 6.0-5**). This additional area is proposed to be designated Open Space and Low Density Residential. At full development, this alternative would still consist of a population of 18,182 persons, 7,475 dwelling units, and 12,800 jobs.





ENVIRONMENTAL ANALYSIS

The following analysis is based on the significant environmental impacts identified in Sections 4.1 through 4.13.

COMPARATIVE ANALYSIS

Land Use and Planning

Land Use Incompatibilities (Impact 4.1.2)

The proposed General Plan Land Use Map was developed with the intent to designate areas for the most appropriate type of land use based on existing land uses, the existing and planned circulation system, the specific needs of lone, environmental constraints, and other factors. Land use designations in the existing city limits are largely unchanged (from the 1982 General Plan Land Use Map). Most of the areas in the city do not have areas of significant potential land use incompatibility. As such, implementation of the proposed Land Use Map would not be expected to result in many significant land use incompatibilities since the proposed GP policies contain language that would assist in mitigating any potential impacts. Areas that could pose potential land use incompatibility include locating residential development such as Castle Oaks and Special Planning Areas (Castle Oaks Gateway, Ringer Ranch, Preston Reuse and 124 Corridor) adjacent to the Mule Creek State Prison and CALFIRE facilities. Therefore this impact is identified as **potentially significant**.

Alternative 5 would result in a similar **potentially significant** impact to the proposed project, since the GP policies regarding land use compatibility that apply to the proposed project would be applicable under this alternative.

<u>Project and Cumulative Consistency Impacts with Relevant Land Use Planning Documents (Impacts 4.1.3 and 4.1.4)</u>

The more intensive land use patterns within the Planning Area under the proposed project would contribute to the environmental effects of growth anticipated to occur in the region in the foreseeable future. The proposed project would increase the existing General Plan Planning Area by approximately 28,009.75 acres and would accommodate a larger population and employment base within the Planning Area through the intensification of development. The proposed project would also designate more land for open space as compared to the existing County General Plan, and the proposed land use pattern and development intensity would substantially contribute to the conversion of land in the region to more urban uses through the designation of currently vacant lands for residential, mixed-use, commercial, and industrial development, and roadway improvement projects including the West lone Roadway Improvement Strategy (WIRIS). The significant environmental effects of such conversions are discussed and analyzed in greater detail in the various sections of this Draft EIR that relate specifically to those particular issue areas (see Section 4.2 through 4.13). This impact is identified as significant and unavoidable under project and cumulative conditions.

Alternative 5 would increase the Planning Area by the same 28,009.75 acres as the proposed project. This would substantially contribute to the conversion of land to urban uses and would therefore also have a similar **significant and unavoidable** impact as the proposed project.

Agricultural Resources

Project and Cumulative Loss and Conversion of Agricultural Lands (Impacts 4.2.1 and 4.2.4)

Implementation of the proposed project Land Use Map would designate a total of 293.10 acres of Important Farmland (62.67 acres Prime Farmland + 1.35 acres Unique Farmland + 13.67 acres Farmland of Statewide Importance + 215.41 acres Farmland of Local Importance) within the Planning Area for urban uses. This impact is **significant and unavoidable** under project and cumulative conditions.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road and the addition of 57.3± acres east of Irish Hill Road. These areas do not contain agricultural uses and are not currently designated for agriculture. Therefore **Alternative 5** would also result in the same loss and conversion of farmland as the proposed project within the Planning Area. This impact would therefore be considered **significant and unavoidable**.

Agricultural/Urban Interface Conflicts (Impact 4.2.2)

Implementation of the proposed project Land Use Map would place urbanized land uses adjacent to agricultural uses and would replace existing agricultural uses. It is anticipated that as the city builds out, new agriculture/urban interface conflicts may occur, particularly in the areas outside the city limits. This impact is identified as **significant and unavoidable**.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road and the addition of 57.3± acres east of Irish Hill Road. These areas do not contain agricultural uses and are not currently designated for agriculture. Therefore impacts under this alternative with regard to potential interface conflicts are identical to those of the proposed project and the impact would remain **significant and unavoidable**.

Agricultural Zoned Lands and Williamson Act Contract Conflicts (Impact 4.2.3)

The Planning Area contains approximately 5,077.47 acres currently under a Williamson Act contract and in non-renewal status. However, none of this land is located within the existing city limits, but is in those portions of the Planning Area that lie outside the city limits. Most of this land is designated to as either General Agriculture (AG) or Open Space (OS), thereby allowing these lands to continue in agricultural operation. However, portions of three parcels within the Triangle Planning Area totaling 91.09 acres would be allowed to develop with various types of urban uses. This potential for development would be in violation of Williamson Act contracts and therefore this impact is considered to be **potentially significant**.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road from the city's SOI and the addition of 57.3± acres east of Irish Hill Road to the city's SOI. These areas do not contain land under Williamson Act contracts. Therefore, the extent of the loss of Williamson Act lands under Alternative 5 would be identical to the proposed project.

Population and Housing

Project and Cumulative Population, Housing and Employment Increases (Impacts 4.3.1 and 4.3.4)

Development under the proposed project and its associated project components would lead to an increase in population and employment. Development and growth in the city, as a result of the implementation of the proposed project, would contribute to cumulative population and housing conditions in the unincorporated areas of Amador County, as well as in surrounding cities and counties. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Alternative 5 has the same development capacity as the proposed project and would therefore result in the same increase in population as the proposed project. Increases in population would have physical effects to the environment resulting in a **significant and unavoidable** impact.

Jobs/Housing Balance Impact 4.3.3)

Implementation of the proposed project is anticipated to have the capacity for up to 12,800 jobs and approximately 7,475 housing units. This would result in a jobs-per-housing ratio of 1.7. It is generally considered ideal to have approximately one job per housing unit in a jurisdiction. A ratio of 1.7 therefore indicates that the Planning Area would have substantially more jobs than housing. This could potentially result in attracting substantial numbers of workers from outside the Planning Area, thereby resulting in increases in traffic congestion, air emissions, and mobile-source noise. This impact is considered **significant**.

Alternative 5 is also anticipated to have the capacity for 12,800 jobs and 7,475 housing units, resulting in a job-per-housing ratio of 1.7. Therefore this alternative would have the same **significant** impacts as that of the proposed project.

Transportation and Circulation

Project and Cumulative Roadway Segment and Freeway Impacts (Impacts 4.4.1 and 4.4.5)

Implementation of the proposed project would provide service levels consistent with the city's LOS "D" standard with few exceptions. The proposed General Plan would result in LOS F within the General Plan planning horizon on:

- SR 104 between Sutter Lane and SR 124 North
- SR 104 between SR 124 North and E Main Street
- SR 104 between SR 124 South and Foothills Blvd
- SR 124 between E Main Street and Washington Street
- SR 124 between Washington Street and WIRIS
- SR 124 between WIRIS and Buena Vista Road

With full development of the Planning Area and regional growth in traffic, these impacts are anticipated to worsen. This impact is identified as **significant and unavoidable** under project and cumulative conditions.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road from the city's SOI and the addition of 57.3± acres east of Irish Hill Road to the city's SOI.

Therefore, **Alternative 5** would result in the same impacts to the Planning Area and regional traffic. Impacts would therefore remain **significant and unavoidable**.

Project and Cumulative Transit System Impacts (Impact 4.4.3)

Implementation of the proposed project would result in an increase in the demand for public transit service. While Amador Regional Transit (ARTs) currently provides six in-bound and outbound trips per day to Sutter Hill and Buena Vista/Comanche, the growth of the city may eventually require greater decreased headway, additional busses, or additional bus stops. The growth in the population and employment sector proposed by the General Plan may increase ridership beyond what is available or planned. Therefore, future unmet transit demand in lone is a **potentially significant** impact.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road from the city's SOI and the addition of 57.3± acres east of Irish Hill Road to the city's SOI. This alternative would therefore result in similar increases in ridership and future unmet transit demand. This impact is also **potentially significant**.

Air Quality

Project and Cumulative Impacts on Air Attainment Plans (Impacts 4.5.1 and 4.5.6)

Population growth and the development potential under the proposed project could emit non-attainment pollutants within Amador County that could challenge the region's ability to meet ozone and PM standards. **Tables 4.5-5** and **4.5.-6** indicate the levels of emissions from vehicles and electricity and natural gas use, associated with residential heating in the winter, landscaping activities, etc. Since a General Plan's impacts on cumulative air quality in a region is determined by its consistency with applicable attainment plans, and since there is currently no ozone attainment plan for Amador County, this impact is considered **significant and unavoidable** under project and cumulative conditions.

Without an ozone attainment plan for the region, **Alternative 5** too would result in impacts that are **significant and unavoidable**.

Odor Emissions (Impact 4.5.3)

Implementation of the proposed project has the potential to allow for several types of project that could locate sensitive receptors near existing and future sources of objectionable odors. In addition, future construction activities could result in odorous emissions from diesel exhaust associated with construction equipment. Thus, this impact is **potentially significant**.

Alternative 5 essentially includes the same Planning Area acreages and conceptual Land Use Map, except for the land swap in the Q Ranch SPA. It also has the potential to allow for several types of project that could locate sensitive receptors near existing and future sources of objectionable odors. This alternative would result in the same **potentially significant** impact as the proposed project.

Expose Sensitive Receptors to Toxic Air Contaminants (TACs) (Impact 4.5.4)

Trenching, grading, and other excavations associated with future development under the proposed project could expose zones of asbestos-containing rock and possibly cause airborne

releases of fibrous minerals in areas containing ultramafic rocks or potentially in areas containing undivided Mesozoic volcanic and metavolcanic rocks. Therefore, implementation of the proposed General Plan Land Use Map could result in releases of, and exposure to, NOA. This is a **significant** impact.

Implementation of **Alternative 5** could expose sensitive receptors to naturally-occurring asbestos (NOA). Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, Alternative 5 would result in the same **potentially significant** impact as the proposed project.

Construction CO Emissions (Impact 4.5.5)

The General Plan update and its associated project components includes land use designations that would allow for future construction of residential, commercial, industrial, and other projects. This will result in construction-related emissions from future projects that would generally be short-term in duration, but may still cause adverse air quality impacts. Inhalable PM₁₀ is the pollutant of greatest concern associated with construction activities. PM₁₀ emissions can result from construction activities facilitated by the proposed General Plan, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle and equipment exhaust. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. This is considered a **potentially significant** impact.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, it would allow for the same increases in construction related activities as the proposed project and would result in the same **potentially significant** impact.

Conflict or Obstruct with Implementation of Greenhouse Gas Reduction Measures (Impacts 4.5.7)

Implementation of the proposed project and its associated project components would increase emissions of CO2e by 2030 over existing (2008) conditions. This increase in GHG emissions is inconsistent with AB 32's goal of reducing 2020 greenhouse gas emissions to 1990 levels. Table 4.5-11 illustrates that most of these increases are likely to come from increases in housing associated with the city's population growth. These increases would increase the carbon footprint of lone in 2030. Even with the proposed policies intended to help reduce GHG emissions from motor vehicles and energy use associated with growth, the net increase in emissions will further contribute to climate change. Also, the projected growth in the City of Ione could contribute to global increases in temperature that could increase exposure of future development to risk related to significant storm events, sea level rise and flooding resulting from global climate change. The proposed project does include a number of policies that would indirectly help mitigate citywide GHG emissions by reducing activities from several key sources of GHGs, including motor vehicles, water conveyance, waste collection, and energy consumption. However, due to the expected increases in GHG emissions resulting from the growth associated with the proposed project, and since the potential extent and severity of any such risk is speculative, given the unknown nature of potential impacts of climate change on lone, this impact would be significant and unavoidable.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, it would have the same increases in GHG emissions resulting from the growth associated with the proposed project. Therefore this impact would be **significant and unavoidable**.

Noise

Construction Noise Impacts (Impacts 4.6.1 and 4.6.4)

Implementation of the proposed project could result in activities associated with construction could result in elevated noise levels at noise-sensitive land uses. Increases in ambient noise levels, particularly during the nighttime hours, could result in increased levels of annoyance and potential sleep disruption. This impact would be considered **potentially significant**.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, construction noise impacts would be similar to the proposed project and would be **potentially significant**.

Project and Cumulative Transportation Noise Impacts (Impacts 4.6.2 and 4.6.5)

Projected future noise contours for major roadways within the city and predicted increases in traffic noise levels associated with future development in the Planning Area are summarized in **Table 4.6-7** and depicted in **Figure 4.6-3** (refer to Impact 4.6-2). Buildout of the Planning Area as set forth in the proposed project would result in additional traffic along these roadways and result in increased noise. This impact would be **significant and unavoidable** under project and cumulative conditions.

The proposed land swap under **Alternative 5** would not change roadway networks from that under the proposed project. Predicted future increases in traffic noise levels would remain the same and would also result in **significant and unavoidable** impacts from transportation noise sources.

Stationary/Non-Transportation Noise Impacts (Impacts 4.6.3)

Implementation of the proposed project policies and actions would reduce noise associated with new stationary noise sources and the placement of new noise-sensitive land uses over which the city has jurisdiction (e.g., commercial and industrial sites, residential uses). However, some stationary noise impacts cannot be mitigated to a less than significant level due to limitations on the city to control the exact placement of substantial noise-generating uses (e.g., school facilities) in proximity to noise-sensitive land uses (e.g., residential). Accordingly, stationary source noise levels from activities on uses for which the city has limited control could result in noise levels that exceed the city's maximum allowable noise standards. Thus, this impact is considered significant and unavoidable.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, this alternative would also result in **significant and unavoidable** impacts associated with stationary and non-transportation noise.

Biological Resources

Impacts to Special-Status Species (Impact 4.8.1)

Development under the proposed project could potentially cause direct and indirect impacts to approximately 16,746 acres of vegetation types that are occupied or potential habitat for listed species. As the final design and extent of future development is not currently known, the acreages listed in **Table 4.8-8** represent the maximum area that could be directly affected. Implementation of the policies and action items in the proposed project would ensure that

impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 5** includes the same Planning Area acreages and conceptual Land Use Map except for the land swap in the Q Ranch SPA, the program level surveys for special status species that were conducted for the proposed project would still be applicable to this alternative since all surveys and research were conducted for the entire Planning Area. The Planning Area encompasses the same area for both the proposed project as well as Alternative 5. Therefore this impact would also be **significant**.

Impacts to Species of Concern and Other Non-Listed Special-Status Species (Impact 4.8.2)

Suitable habitat exists in the Planning Area for unlisted but nonetheless special-status species. These species are designated as a species of concern by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Game (CDFG), and/or listed in the CNPS's online inventory as List 2. Direct impacts to these species would occur for the same reasons and in the same manner as direct and indirect impacts to listed species as identified and discussed in Impact 4.8.1. **Table 4.8-9** in Section 4.8, Biological Resources, provides information on the acreages of suitable habitat that would be affected by implementation of the proposed project. Implementation of the policies and action items in the proposed project would ensure that impacts to special-status species are identified and mitigated to ensure viability of the species, and ensure that habitat areas are avoided or mitigated if avoidance is determined to be infeasible. As such, this impact is considered **significant**.

Since **Alternative 5** includes the same Planning Area acreages and conceptual Land Use Map except for the land swap in the Q Ranch SPA and all surveys and research were conducted for the entire Planning Area, the program level surveys for species of concern and other non-listed special-status species that were conducted for the proposed project would still be applicable to this alternative. Therefore this impact would also be **significant**.

Impacts to Sensitive Habitats (Impact 4.8.3)

Implementation of the proposed project could result in disturbance, degradation, and removal of up to 147 acres of valley oak woodland, 3,306 acres of blue oak woodland, 322 acres of blue oak foothill pine, and 821 acres of montane hardwood which has a high potential to support vernal pools, a CDFG sensitive habitat. Vernal pools require the surrounding upland habitat to maintain their habitat value and function. Approximately 501.2 acres of wetland and open water habitat would also be in direct conflict with the proposed land use designation (i.e. industrial, residential and other built environment). Implementation of the proposed project could also result in disturbance, degradation, and removal of riparian habitat, and would result in the conversion of farmland that provides habitat to several listed species and impacts are considered significant.

Since portions of Dry Creek run through the Q Ranch SPA and this waterway has the potential to support sensitive habitats, the land swap proposed under **Alternative 5** could have **significant** impacts that would be worse than those of the proposed project.

Impacts to Migratory Corridors (Impact 4.8.4)

Implementation of the proposed project would interfere substantially with the movement of several special status and common wildlife species. Wildlife movement corridors are routes frequently utilized by wildlife that provide shelter and sufficient food supplies to support wildlife

species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat. This would be a **significant** impact.

As mentioned above, portions of Dry Creek run through the Q Ranch SPA. This waterway has the potential to support wildlife species during migration. Therefore, the land swap proposed under **Alternative 5** could have **significant** impacts that would be worse than those of the proposed project.

Cumulative Biological Resource Impacts (Impact 4.8.6)

Implementation of the proposed project could result in the loss of substantial sensitive habitat areas as well as farmland utilized by state and federally listed species that would add to cumulative loss of such habitat. Given the extent of this potential conversion and loss of habitat, this impact is considered **significant and unavoidable** under project and cumulative conditions.

The Planning Area encompasses the same area for both the proposed project and **Alternative 5** and potential loss of habitat would be the same for this alternative. Therefore the impact remains **significant and unavoidable**.

Cultural and Paleontological Resources

<u>Project and Cumulative Prehistoric and Historic Resource Impacts (Impacts 4.9.1, 4.9.2, 4.9.4, and 4.9.5)</u>

Cumulative development in the region would result in the loss and/or degradation of cultural resources. These cumulative effects of development on cultural resources would be significant. Since most of the Planning Area, particularly outside the city limits has not been surveyed for cultural resources, there is the potential for future development to uncover previously undiscovered cultural resources because of the area's historic occupation by Native Americans, Spanish, and other groups of settlers. Buildout of the Planning Area could contribute to the cumulative loss of cultural resources in the region. Thus, this impact is **potentially significant** under project and cumulative conditions. The proposed project contains several policies and action items that would mitigate its contribution to this impact.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road from the city's SOI and the addition of 57.3± acres east of Irish Hill Road to the city's SOI. Therefore, **Alternative 5** has the potential to result in the cumulative loss of cultural resources in the region in the same manner as the proposed project. **Alternative 5** would include the same policies to mitigate impacts to prehistoric and historic resources as the proposed project.

Project and Cumulative Paleontological Resource Impacts (Impacts 4.9.3 and 4.9.6)

A search of the University of California, Berkeley Museum of Paleontology collections database identified only one fossilized plant within the boundaries of the city. The sensitivity of the area for paleontological resources, however, has not been assessed on a parcel by parcel basis, and no formal paleontological investigations were identified for the area. Consequently, implementation of the proposed project could impact undiscovered paleontological resources. This impact is **significant** under project and cumulative conditions. However, the proposed project policies and action items in the Historic and Cultural Resources Element include provisions that would ensure paleontological resources are protected.

Under **Alternative 5**, all future urban development is anticipated to occur in the same areas as the proposed project, with the exception of the removal of 13.7± acres west of Irish Hill Road from the city's SOI and the addition of 57.3± acres east of Irish Hill Road to the city's SOI. Therefore, **Alternative 5** has the potential to impact undiscovered paleontological resources in the same manner as the proposed project. In addition, **Alternative 5** would include the same policies to mitigate impacts on paleontological resources as the proposed project.

Hydrology and Water Quality

Construction, Operation, Groundwater, and Cumulative Water Quality Impacts (Impacts 4.10.1, 4.10.2, and 4.10.3)

Continued compliance with applicable SWRCB statewide water quality permits and the city's Storm Water Quality Management Program would minimize the pollutant load of storm drainage within the Planning Area from development that could be accommodated under the proposed GPU. Implementation of General Plan Update policies would further protect surface and groundwater quality and mitigate the city's contribution to this impact by protecting natural streams and drainages, reducing potential sources of pollutants, and requiring the use of landscaping and other BMPs to prevent pollutants from entering surface and groundwater resources. As such, the city's contribution to cumulative water quality impacts is considered a significant impact under project and cumulative conditions.

Since **Alternative 5** encompasses the same Planning Area as the project, this alternative would result in a similar **significant** impact as the proposed project through compliance with SWRCB statewide water quality permits and the city's Storm Water Quality Management Programs.

Exposure to Flood Hazards (Impact 4.10.4)

The Planning Area is traversed by several creeks for which 100-year floodplains have been mapped by FEMA or the State of California DWR. Some of the 100-year floodplain area mapping within the Planning Area has only been based on approximate method technical evaluations and does not include detailed information such as base flood (100-year) elevations. In these areas, the possibility of exposing structures and facilities to flood hazards and potential damage as a part of new development is considered to be a **potentially significant** impact.

Since **Alternative 5** encompasses the same Planning Area as the project, this alternative would result in a similar **significant** impact for flooding hazards.

Geology and Soils

Slope Instability and Landslides (Impacts 4.11.3)

Implementation of the proposed project, along with potential development in the Planning Area could result in slope instability near the edges of steep slopes and if temporary or permanent cut and/or fill slopes were made during construction. Therefore, implementation of the proposed project could expose new development within the city limits to hazards associated with slope instability and landslides. This is a **potentially significant** impact.

Alternative 5 encompasses the same Planning Area as the project and would result in the same development potential. Therefore, Alternative 5 would result in the same slope instability impacts as the proposed project. Therefore, this alternative would result in a similar **significant** impact.

Project and Cumulative Loss of Mineral Resources (Impacts 4.11.5 and 4.11.8)

Current mining operations within the Planning Area are designated as Surface Mining (SM) and are anticipated to continue with mining operations and the extraction of mineral resources. Encroachment of urban uses in adjacent areas could result in conflicts with these mining operations and impacts could be potentially significant. This impact is considered **significant** under project conditions and **significant and unavoidable** under cumulative conditions.

Though **Alternative 5** would also result in potential mining operation conflicts, risks, and the associated **significant/significant** and **unavoidable** impacts, these impacts may be slightly greater than those under the proposed project as Alternative 5 would convert 43.6 acres of surface mining lands to open space and other uses.

Naturally Occurring Asbestos Impacts (Impact 4.11.6)

Natural asbestos occurs commonly in ultramafic rocks and the presence of ultramafic rocks within a region indicates the possibility of naturally occurring asbestos materials. The proposed Planning Area has the potential to contain these sources of naturally occurring asbestos. Since there are no established safe exposure levels for residential areas, public exposure to any amount of asbestos poses a potential health risk. Impacts are therefore **significant**.

Alternative 5 would have similar **significant** impacts though the extent of this could be slightly greater than that of the proposed project since Alternative 5 would include conversion of 43.6 acres of land currently designated for Surface Mining into land that could be developed with residential uses. This may have greater potential to expose residents to sources of naturally occurring asbestos.

Visual Resources

Alteration of Visual Character (Impact 4.12.3)

The proposed project policy provisions assist in minimizing visual impacts related to the conversion of agricultural lands to urban uses by adopting and enforcing development design, landscape, and façade maintenance standards, building codes, and community standards, as well as by implementing open space preservation techniques and building design standards. However, given the size of the Planning Area, the proposed project would nevertheless result in a substantial change in visual resources in the Planning Area. There are no feasible mitigation measures available to offset this change in visual resources, as the urban uses proposed under the project are fundamentally different from current farmland uses. Thus, this impact is considered significant and unavoidable.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, this alternative would also result in alterations of visual character to the same potential areas as the proposed project. Therefore, this impact would be considered **significant and unavoidable**.

Daytime Glare and Nighttime Lighting (Impact 4.12.4)

Implementation of the proposed project would result in the intensification of land uses within the Planning Area, which has the potential to create new sources of daytime glare and nighttime illumination. Thus, impacts are **potentially significant**.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, this alternative would result in the same impacts to daytime glare and nighttime lighting as compared to the proposed project and would also have a **potentially significant** impact.

Cumulative Visual Resource Impacts (Impact 4.12.5)

Implementation of proposed policies and action items would reduce the proposed project's cumulative impacts on visual resources through the adoption and enforcement of development design standards, landscape and façade maintenance programs, building codes, and community standards, as well as the implementation of open space preservation techniques, building design standards, growth boundary programs, and nighttime lighting controls. However, with implementation of the proposed General Plan, increased development would occur and changes to existing scenic resources would be inevitable. Therefore, this impact is considered significant and unavoidable.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, this alternative would result in similar cumulative visual resources impacts as under the proposed project. This impact would be considered **significant and unavoidable**.

Public Services and Utilities

Wildland Fire Impacts (Impact 4.13.1.2)

Implementation of the proposed project could result in safety hazards associated with wildland fires in residential, commercial and industrial areas adjacent to open space and natural areas. The Planning Area is located in an area susceptible to risk of wildland fires. The entire County is classified as moderate to very high fire hazard severity based on CALFIRE analysis of fuels, terrain and weather. The rural setting coupled with hot, dry summers, dense clusters of trees as well as dry grasses present the potential for wildland fire. This is considered a **potentially significant** impact.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, this alternative would result in similar wildfire impacts as under the proposed project, and this impact would be considered **potentially significant**.

Waste Discharge Requirements (Impact 4.13.4.2)

The lone secondary WWTP is currently operating under Cease and Desist Order No. R5-2003-0108 (CDO). The CDO was adopted by the Central Valley RWQCB due to concerns with the seepage along the southern creek bank of Sutter Creek to the immediate north of the lone secondary WWTP ponds. It was concluded that the seepage amounted to a discharge of WWTP effluent into Sutter Creek. In addition, the Central Valley RWQCB identified that the percolation ponds were potentially impacting the groundwater quality underlying the plant. The proposed project would increase wastewater flows and disposal of these flows into percolation ponds would further exacerbate seepage and groundwater impacts identified in the CDO. This impact is potentially significant.

Since Alternative 5 includes the same Planning Area acreages and would allow for the same increases in development and population as the proposed project, this alternative would result

in a similar increase in wastewater flows and this impact would remain **significant and unavoidable**.

6.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. State CEQA Guidelines Section 15126(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Table 6.0-3 provides a summary of the potential impacts of the alternatives evaluated in this section, as compared with the potential impacts of the proposed project. The impact significance is identified for each alternative as well as the ranking of the impact as compared to the proposed project. A "B" ranking means that the alternative would either avoid or lessen the identified environmental impacts of the proposed project, while a "W" ranking means the alternative would result in a greater impact. The "S" ranking identifies where the alternative has a similar impact as the proposed project. Based upon the evaluation described in this section, the Alternative 1 would be the environmentally superior alternative. As stated above, if the environmentally superior alternative is the no project alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. After the no project alternative (Alternative 1), Alternative 2 would be the environmentally superior alternative.

TABLE 6.0-1
SUMMARY COMPARISON OF ALTERNATIVES

Environmental Impacts	Proposed General Plan Updates	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Land Use and Planning						
Land Use Incompatibilities (Impact 4.1.2)	PS	В	S	S	W	S
Project and Cumulative Consistency Impacts with Relevant Land Use Planning Documents (Impacts 4.1.3 and 4.1.4)	S&U	В	В	В	S	S
Agricultural Resources						
Project and Cumulative Loss and Conversion of Agricultural Lands (Impacts 4.2.1 and 4.2.4)	S&U	В	В	W	S	S
Agricultural/Urban Interface Conflicts (Impact 4.2.2)	S&U	В	S	S	W	S
Agricultural Zoned Lands and Williamson Act Contract Conflicts (Impact 4.2.3)	PS	В	S	S	S	S
Population and Housing						
Project and Cumulative Population, Housing and Employment Increases (Impacts 4.3.1 and 4.3.4)	S&U	В	W	W	S	S
Jobs/Housing Balance Impact 4.3.3)	Significant	В	В	В	S	S
Transportation and Circulation						
Project and Cumulative Roadway Segment and Freeway Impacts (Impacts 4.4.1 and 4.4.5)	S&U	В	W	W	S	S

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6.0 Project Alternatives

Environmental Impacts	Proposed General Plan Updates	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
Project and Cumulative Transit System Impacts (Impact 4.4.3)	PS	В	W	W	S	S	
Air Quality							
Project and Cumulative Impacts on Air Attainment Plans (Impacts 4.5.1 and 4.5.6)	S&U	S	S	S	S	S	
Odor Emissions (Impact 4.5.3)	PS	В	W	W	S	S	
Expose Sensitive Receptors to Toxic Air Contaminants (TACs) (Impact 4.5.4)	Significant	В	W	W	S	S	
Construction CO Emissions (Impact 4.5.5)	PS	S	W	W	S	S	
Conflict or Obstruct with Implementation of Greenhouse Gas Reduction Measures (Impacts 4.5.7)	S&U	W	W	W	S	S	
Noise							
Construction Noise Impacts (Impacts 4.6.1 and 4.6.4)	PS	S	W	W	S	S	
Project and Cumulative Transportation Noise Impacts (Impacts 4.6.2 and 4.6.5)	S&U	S	W	W	S	S	
Stationary/Non-Transportation Noise Impacts (Impacts 4.6.3)	S&U	S	W	W	S	S	
Biological Resources							
Impacts to Special-Status Species (Impact 4.8.1)	Significant	В	В	В	S	S	
Impacts to Species of Concern and Other Non-Listed Special- Status Species (Impact 4.8.2)	Significant	В	В	В	S	S	
Impacts to Sensitive Habitats	Significant	В	В	В	S	W	

Environmental Impacts	Proposed General Plan Updates	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	
(Impact 4.8.3)							
Impacts to Migratory Corridors (Impact 4.8.4)	Significant	W	W	W	S	W	
Cumulative Biological Resource Impacts (Impact 4.8.6)	S&U	В	В	В	S	S	
Cultural and Paleontological Resou	ırces						
Project and Cumulative Prehistoric and Historic Resource Impacts (Impacts 4.9.1, 4.9.2, 4.9.4, and 4.9.5)	PS	W	В	В	S	S	
Project and Cumulative Paleontological Resource Impacts (Impacts 4.9.3 and 4.9.6)	Significant	W	В	В	S	S	
Hydrology and Water Quality							
Construction, Operation, Groundwater, and Cumulative Water Quality Impacts (Impacts 4.10.1, 4.10.2, and 4.10.3)	Significant	В	W	W	S	S	
Exposure to Flood Hazards (Impact 4.10.4)	Significant	S	S	S	S	S	
Geology and Soils							
Slope Instability and Landslides (Impacts 4.11.3)	PS	В	W	W	S	S	
Project and Cumulative Loss of Mineral Resources (Impacts 4.11.5 and 4.11.8)	S&U	В	W	W	S	W	
Naturally Occurring Asbestos Impacts (Impact 4.11.6)	Significant	В	S	S	S	W	
Visual Resources	Visual Resources						
Alteration of Visual Character (Impact 4.12.3)	S&U	В	В	В	S	S	

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6.0 Project Alternatives

Environmental Impacts	Proposed General Plan Updates	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Daytime Glare and Nighttime Lighting (Impact 4.12.4)	PS	S	W	W	S	S
Cumulative Visual Resource Impacts (Impact 4.12.5)	S&U	В	В	В	S	S
Public Services and Utilities						
Wildland Fire Impacts (Impact 4.13.1.2)	PS	S	W	W	S	S
Waste Discharge Requirements (Impact 4.13.4.2)	S&U	В	W	W	S	S

Notes:

B: Alternative would result in better conditions than the proposed project.

S: Alternative would result in similar conditions as the proposed project.

W: Alternative would result in worse impacts than the proposed project.

PS - Potentially Significant

S&U – Significant and Unavoidable