

## 5.1 Overview

This chapter includes the following discussions and analyses required by the California Environmental Quality Act (CEQA).

- Cumulative impacts.
- Growth-inducing impacts.
- Significant and unavoidable environmental impacts.
- Significant irreversible environmental impacts.
- Mitigation measures with the potential for environmental effects.

This chapter also evaluates the potential indirect environmental effects of construction and occupancy of secondary dwelling units in the Lime Rock Valley Specific Plan (LRVSP) (proposed project). The project applicant is not proposing secondary dwelling units and is not seeking entitlements for the units. Consequently, they are not part of the proposed project description. However, a proposed land use designation in the LRVSP provides for secondary dwelling units. Secondary dwelling units are allowed by right as provided in the El Dorado County Code of Ordinances and do not in and of themselves require environmental review under CEQA. However, they are a reasonably foreseeable outcome of implementing the LRVSP and, therefore, require CEQA review as indirect (or secondary) effects of the proposed project.

## 5.2 Cumulative Impacts

The State CEQA Guidelines define a *cumulative impact* as two or more individual impacts that, when considered together, are significant or that compound or increase other significant environmental impacts. The incremental impact of a project may be considerable when viewed in the context of other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time (State CEQA Guidelines Section 15355).

State CEQA Guidelines Section 15130(b) indicates that an adequate discussion of significant cumulative impacts requires consideration of either of the following.

(A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

(B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan.

This environmental impact report (EIR) uses a combination of both approaches above. That is, the cumulative analysis is based on the adopted general plan—the projections approach using projected growth consistent with, and within the planning horizon of, the *El Dorado County General Plan* (County General Plan) (El Dorado County 2004)—supplemented by a list of additional projects that are not currently included in the general plan. Together, this combined approach is used to determine whether significant cumulative impacts would occur.

In reaching a conclusion for each resource area (i.e., the topics analyzed in Chapter 3, *Impact Analysis*, Sections 3.1 through 3.14), five considerations were made: (1) the geographic scope of the cumulative impact area for that resource, (2) the timeframe within which project-specific impacts could interact with the impacts of other projects, (3) whether a significant adverse cumulative condition presently exists to which project impacts could contribute, (4) the significance of the incremental project-specific contribution to cumulative conditions, and (5) whether any cumulative impact is significant.

For the purpose of this EIR, significant cumulative impacts would occur if impacts related to project implementation, combined with the environmental impacts of growth consistent with the County General Plan as forecast through its planning horizon, and the additional approved and reasonably foreseeable projects indicated below, would result in an adverse significant effect. For an impact to be considered cumulative, these incremental impacts and potential incremental impacts must be related to the types of impacts caused by the project and evaluated in Chapter 3, *Impact Analysis*.

## 5.2.1 Cumulative Scenario

The cumulative analysis considers impacts of the proposed LRVSP together with the planning horizon under the County General Plan and other reasonably foreseeable projects producing related impacts, as described below.

### General Plan Planning Horizon

The County General Plan, adopted in 2004, presents the County's comprehensive, long-term vision for physical development and resource conservation. Several General Plan elements have since been amended: Public Services and Utilities in 2015, Conservation and Open Space in 2017, and Land Use, Transportation and Circulation, Public Health, Safety, and Noise, and Economic Development in 2019. Growth consistent with the County General Plan through its planning horizon would result in the development of up to 78,692 new housing units beyond the 44,708 units existing in 1999, for a total of 123,400 dwelling units housing an estimated 317,692 people within the unincorporated west slope area (EDAW 2003). The maximum commercial and industrial development permitted through the County General Plan planning horizon is estimated to be 6,684 acres, at a floor area ratio of 0.25, accommodating a total of 117,122 jobs (EDAW 2003).

Practical constraints, such as slope, waterways, biological resources, and availability of roadways and infrastructure, make it unlikely that maximum theoretical density buildout could be achieved and especially not within the planning horizon of the County General Plan. In addition, the proposed project is anticipated to be built out within the planning horizon; therefore, the planning horizon is used as a basis for this cumulative scenario.

El Dorado County's 2021–2029 Housing Element Update identifies that population could grow by an additional 16,846 persons by 2030 from 2020 (El Dorado County 2021). It is expected that the El Dorado County population will increase by 8.8 percent between 2020 and 2030, with an average

annual growth rate of 0.9 percent per year (El Dorado County 2021). It is projected that the County will grow to approximately 225,419 residents by 2040, an increase of approximately 36,413 new residents compared to the current population of 189,006 residents (El Dorado County 2021).. Approximately 17,900 new housing units have been built since 2000, leaving approximately 14,600 remaining housing units to be built in the planning horizon.

In 2013, the County updated the housing and employment growth projections to assist in the preparation of the updated County Travel Demand Model, which was used for the LRVSP traffic analysis (BAE Urban Economics 2013). The traffic study was based on the data available at the time of the Notice of Preparation for the project. The Travel Demand Model was updated in 2020 and used for the project analysis of VMT for CEQA analysis.

Growth allocations based on the distribution of new development in the County between 2000 and 2011 and development applications from 2006 through present were used to extrapolate future growth. In 2010, there were 59,668 existing housing units. In 2035, it was projected that there would be 77,077 housing units. The 2035 planning horizon forecasts differ only slightly from the 2025 planning horizon forecasts done in 2002. This is largely a result of the housing crash in the late 2000s, and the resulting drastic reduction in the rate of growth in El Dorado County. Details on the methodology for the forecasts are presented in the BAE memo, available on the County's website at <https://www.edcgov.us/government/planning/documents/BAE%20Report.pdf>.

The 2019 growth projections cover the western slope of El Dorado County (excluding Placerville) and examine growth from 2018 to a planning horizon (now labeled 2040). Growth allocations based on the distribution of new development in the County between 2000 and 2018 and development applications from 2010 through present were used to extrapolate future growth. Details on the methodology for the forecasts are presented in the BAE memo, available on the County's website at <https://www.edcgov.us/Government/dot/Documents/CIP/Revised%20Draft%20BAE%20Memorandum%20West%20Slope%20Projections.pdf>.

Among the specific projects included in the planning horizon of the County General Plan are those considered to be existing commitments—projects for which a tentative map or development agreement existed before approval of the County General Plan but that were not yet built out at the time the 2004 County General Plan was adopted. These projects have the potential to contribute 14,565 dwelling units to the County General Plan total (EDAW 2003). Since adoption of the County General Plan, several of the approved projects have decreased in size or were partially built out and are now expected to supply an additional 4,357 of the possible 14,300 new dwelling units. These projects include the Bass Lake Hills Specific Plan, Carson Creek Specific Plan, El Dorado Hills Specific Plan, Marble Valley Master Plan, Promontory Specific Plan, and Valley View Specific Plan (Table 5-1).

**Table 5-1. El Dorado County Approved Projects – County General Plan**

Project	Residential Uses (dwelling units)			Commercial and Industrial/ Research and Development Uses (acres)	Parkland and Open Space Uses (acres)
	Entitled	Built	Remaining		
Bass Lake Hills Specific Plan	1,458	162	1,296	0	31 – Park 151 – OS
Carson Creek Specific Plan	1,925	1,544	381	99	37 – Park 200 – OS
El Dorado Hills Specific Plan	6,162	4,929 <sup>a</sup>	1,233	301	60 – Park 808 – OS

Project	Residential Uses (dwelling units)			Commercial and Industrial/ Research and Development Uses (acres)	Parkland and Open Space Uses (acres)
	Entitled	Built	Remaining		
Marble Valley Master Plan <sup>b</sup>	398	0	398	0	54 – Park 1,271 – OS
Promontory Specific Plan	1,100	752 <sup>c</sup>	348	7	35 – Park 101 – OS
Valley View Specific Plan	2,840	2,139	701	40	86 – Park 617 – OS
<b>Total</b>	<b>13,883</b>	<b>9,526</b>	<b>4,347</b>	<b>447</b>	<b>303 – Park 3,148 – OS</b>

OS = Open Space.

<sup>a</sup> As of 2024.

<sup>b</sup> Tentative Map for Marble Valley Master Plan expired.

<sup>c</sup> Includes 16-66 lots that are recorded but not yet built.

### Bass Lake Hills Specific Plan

The 1,196-acre Bass Lake Hills Specific Plan area, approximately 3 miles east of the Sacramento/El Dorado County line and north of U.S. Highway (US) 50 between El Dorado Hills and Cameron Park. The Bass Lake Hills Specific Plan was adopted in 1995 and allows development of 1,458 dwelling units with 31 acres of parks and 151 acres of open space (El Dorado County 1995, 2003). As of February 2024, only 162 dwelling units had been constructed. Town and Country Village, a hotel and resort development, which is part of the Bass Lake Hills Specific Plan is currently under consideration.

### Carson Creek Specific Plan

The Carson Creek Specific Plan, adopted in 1996 and amended in 1999, allows development of an approximately 710-acre area along the Sacramento County line, south of US 50 and adjacent to the El Dorado Hills Business Park. Buildout of the Carson Creek Specific Plan would allow 1,700 dwelling units, with approximately 1,544 constructed as of February 2024, up to 40,000 sf of commercial uses, up to 449,605 sf of research and development uses, and 780,279 square feet of industrial uses, 37 acres of public parkland, and 200 acres of open space (El Dorado County 1999).

### El Dorado Hills Specific Plan

The El Dorado Hills Specific Plan allows development of up to 4,481 dwelling units, 301 acres of commercial uses, 60 acres of parks and public facilities, and 808 acres of open space uses on a 3,646-acre site north of US 50 and south of Green Valley Road, as well as approximately 158 acres of commercial land uses south of US 50 (El Dorado County Community Development Department 1988). Approximately 4,929 dwelling units have been constructed as of February 2024.

### Marble Valley Master Plan

The Marble Valley Master Plan development, a 2,341-acre area south of US 50 between the Bass Lake Road and Cambridge Road interchanges, was approved by the County Board of Supervisors in 1998 for 398 dwelling units, 1,271 acres of open space, and 54 acres of parks and public facilities

(EDAW 2003). However, the tentative map has expired, and this project was not constructed, and there is a new proposed plan, which is described under *Related Projects*, below.

### Promontory Specific Plan

The Promontory Specific Plan allows development of an approximately 1,000-acre area, south of Folsom Reservoir and north of US 50, with up to 1,097 dwelling units, 7 acres of commercial and office uses, 35 acres of parks and public facilities, and 101 acres of public open space (EDAW 2003). As of February 2024, approximately 753 dwelling units have been constructed or lots have been recorded.

### Valley View Specific Plan

The Valley View Specific Plan area covers 2,837 acres south of US 50 in the El Dorado Hills area and allows development of up to 2,840 dwelling units, 40 acres of commercial uses, including mixed-use development, 86 acres of multi-use open space (parks and public facilities), two schools, and 617 acres of passive open space and buffer areas (EDAW 2003). As of February 2024, approximately 2,139 dwelling units have been constructed.

## Other Projects

Other projects not specifically addressed in the County General Plan buildout planning horizon assumptions include Saratoga Estates (formerly Rancho Dorado) residential development, the Tilden Park Project, and the Village of Marble Valley Specific Plan (VMVSP). In addition, the El Dorado Town Center Apartments, a four-story 214-unit apartment complex, approved by the County in 2018, and has been built out and is now occupied, was originally planned as a hotel project and was included as such in the planning horizon assumptions described above in the County General Plan. However, the change in use from hotel to residential results in higher density and required a general plan amendment. The locations of these proposed projects are shown in Figure 5-1. Residential and commercial development, and parks and open space lands associated with these projects are described below and in Table 5-2.

**Table 5-2. Other Projects**

Project	Residential Uses		Commercial and Industrial/ Research and Development Uses (acres)	Parkland and Open Space Uses (acres)
	Dwelling Units	Acres		
El Dorado Hills Town Center Apartments	214	4.6	0	0
Village of Marble Valley Specific Plan	3,236	797	10.9	8 – Park 1,284 – OS
Saratoga Estates	317	70.98	0	5.42 – Park 37.04 – OS
Tilden Park	14	2.97	8.2	0 – Park 1.64 – OS
Montano de El Dorado	-	-	3.3	-

Project	Residential Uses		Commercial and Industrial/ Research and Development Uses (acres)	Parkland and Open Space Uses (acres)
	Dwelling Units	Acres		
Subtotal	3,781	875	22.42	13.42 – Park 1,322 – OS
Combined Park/OS Total	-	-	-	1,335.42

Sources: El Dorado County 2007, 2012a, 2012b, 2020, 2021; G3 Enterprises 2020; Marble Valley Company, LLC 2023.

OS = Open Space.

### Targeted General Plan Amendment/Zoning Ordinance Update

The Board of Supervisors adopted the TGPA/ZOU in December 2015. The TGPA/ZOU does not include any site-specific development proposals, although it does include adoption of guidelines for mixed-use development. Rather, it is limited to amendments to County General Plan policies and a comprehensive revision of the zoning ordinance. Policies pertinent to the proposed project include policies to increase the maximum density for the residential portion of mixed-use projects in Community Regions from 16 dwelling units per acre (du/ac) to 20 du/ac, to amend the Multifamily Residential (MFR) designation to encourage a full range of housing types, and to encourage infill projects.

### El Dorado Hills Town Center Apartments Project

The Town Center Apartments project is a 214-unit apartment complex located at the northwest corner of Town Center Boulevard and Vine Street within the Town Center East Planned Development in El Dorado Hills. The site is within Village T of the El Dorado Hills Specific Plan and was originally planned as a hotel, and as such, is included in the County General Plan planning horizon. The project required an amendment to the County General Plan to increase residential density from 24 du/ac to 55 du/ac, amendments to the El Dorado Hills Specific Plan, rezone, and revisions to the approved Town Center East Development Plan. The County approved the project in 2018. It is now fully built out and occupied.

### Saratoga Estates (Rancho Dorado) Residential Development

The approved Saratoga Estates (formerly Rancho Dorado) residential project, currently under construction, includes development of 317 residential units, 5.42 acres of public parkland, 37.04 acres of open space, and 8.4 acres of public roads in the El Dorado Hills area (El Dorado County 2015). The site is north of US 50 and 0.5 mile west of the intersection of US 50 and El Dorado Hills Boulevard. The first phase of development has been built out and the second phase is underway.

### Tilden Park Subdivision

The proposed Tilden Park subdivision consists of a proposed residential and commercial development on a 12.01-acre site north of Wild Chaparral Drive and 500 feet west of Crosswood Drive in Shingle Springs just north of US 50. The Tilden Park subdivision proposes development of three residential parcels, and a total of 38,550 square feet of commercial development within three commercial lots that would include retail, grocery, restaurant, and office uses, as well as an 80-unit hotel (El Dorado County 2012b).

## Village of Marble Valley Specific Plan

The proposed VMVSP would replace the existing development agreement for the Marble Valley site, and would allow development of up to 3,236 residential units, 475,000 square feet of non-residential uses, 55 acres of agricultural use, 1,284 acres of open space, 87 acres of public facilities/recreational use (including 47 acres of public parkland), and 61 acres of road impact areas and future right-of-way (El Dorado County 2013). As such, buildout of the proposed VMVSP would increase the total number of dwelling units proposed within the Marble Valley site—and the County—by 3,236 dwelling units (note that the original Marble Valley Tentative Map has expired).

## Montano De El Dorado Phase I and II Master Plan

The proposed Montano De El Dorado Phase I and II Master Plan (project), approximately 16.8 acres, would expand the existing Montano de El Dorado retail center (Phase I) to include additional retail space, an office building, hotel, and a small amphitheater. Phase II would consist of a total of 10 buildings for a total floor area of approximately 75,400 square feet and 143,900 square feet of commercial and office uses. The project would also include the provision of outdoor special events within existing Phase I and within the proposed amphitheater and parking lots within Phase II.

## 5.2.2 Analysis of Potential Cumulative Impacts

### Aesthetics

The El Dorado National Forest serves as a natural resource area that is generally protected from, and therefore limits, the eastward expansion of mixed-use development that is occurring and is likely to occur within the western portion of the County. Therefore, the cumulative context for aesthetics includes western El Dorado County, which comprises the central region of the County slated for development, as forested areas to the east would remain largely untouched. The projects occurring in the western County include those identified in the planning horizon of the County General Plan and related projects (El Dorado Town Center Apartments, Rancho Dorado residential development, Tilden Park subdivision, and VMVSP), which all combine to affect visual resources within the western County. Cumulative impacts for aesthetics would occur where a project, when combined with cumulative projects, would contribute to the substantial degradation or alteration of the existing visual character of the vicinity and regional context, associated scenic vista views, and views from scenic highways. Such views can be altered by extensive vegetation removal and landform alteration and the introduction of incompatible anthropogenic features, all which act to transform the visual landscape of the vicinity and the region as a whole. In addition, new sources of light can create light pollution and ambient glow that can affect nighttime views, for example, by reducing the amount of visible dark sky and stars and introducing nuisance light spill.

Development of the LRVSP site would result in the impacts on visual resources identified in Chapter 3, Section 3.1, *Aesthetics*, and would contribute to cumulative visual impacts in the area. These impacts include temporary visual changes as a result of construction activities, changes to scenic vistas, changes in visual character and quality at the project site, and changes in light and glare at the project site and vicinity introduced from new lighting sources. The proposed project would not contribute to cumulative visual impacts on scenic resources along scenic highways.

While construction activities are temporary in nature, they would require the removal of mature native oak trees, manzanita chaparral, and grasslands on the site, which is largely undeveloped.

Compliance with County General Plan Policy 7.4.4.4 and a biological resources study and important habitat mitigation plan would result in the retention and replacement of oak woodland. However, manzanita chaparral and grasslands would still be affected. Construction would occur near sensitive visual receptors along the borders of the site. While the proposed project is designed to retain large portions of oak woodlands located onsite, the quality of available views would be affected by construction activities occurring on an undeveloped site, through the removal of site vegetation, and onsite grading that would all result in negative visual impacts.

As described in Chapter 3, Section 3.1, *Aesthetics*, the area has rolling terrain and affords quality scenic vistas, and the proposed project would be seen from hillsides and in vista views. In addition, the project site is unlit open space, and the surrounding area is minimally lit. Therefore, lighting associated with the proposed project would substantially increase the amount of glare and nighttime lighting and would result in a considerable contribution to a cumulative impact related to ambient light glow and light pollution in the area.

The proposed project would contribute to the transformation of undeveloped, natural open space areas with suburban development and associated infrastructure and alter the existing visual character and quality of the site. The proposed project is located in an area that is not highly developed. The project design retains much of the project site in open space, uses design measures to reduce impacts on onsite natural resources that also serve as a visual amenity, and implementation of Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, AES-4a, and AES-4b would reduce the visual prominence of the proposed project, making it blend better within its existing visual environment. However, even with these measures, the proposed project would permanently convert the site from scenic natural open space to one that is developed with buildings, infrastructure, and utilities; is well-lit; and would reduce the visual quality of views associated with the site and the project vicinity. Therefore, cumulative impacts related to open space conversion is cumulatively considerable. This impact would be significant and unavoidable.

## Air Quality

The County does not currently attain the national ambient air quality standards (NAAQS) or California ambient air quality standards (CAAQS) for ozone, the NAAQS for fine particulate matter (PM<sub>2.5</sub>), or the CAAQS for coarse particulate matter (PM<sub>10</sub>). Certain individuals residing in areas that do not meet the ozone or particulate matter ambient air quality standards, including El Dorado County, could be exposed to pollutant concentrations that cause or aggregative acute and/or chronic health conditions (e.g., asthmas, lost workdays, premature mortality). El Dorado County Air Quality Management District (EDCAQMD) has developed project-level thresholds that are derived from region-specific modeling that demonstrates the air basin can cumulatively accommodate project emissions below the threshold levels without affecting attainment of the health-protective NAAQS or CAAQS, as required by the local air quality plans.

As discussed in Section 3.2, *Air Quality*, the LRVSP Sustainability Element includes several policies that would contribute to criteria pollutant reductions during construction and operation. While these policies are consistent with reduction measures in the Ozone Plan, the project would require amending the County General Plan land use diagram. Construction and combined construction and partial operation of new buildings would also result in emissions in excess of EDCAQMD's significance thresholds (see Section 3.2, Impacts AQ-2a and 2c). Accordingly, build-out of the LRVSP would contribute to the existing regional cumulative air quality impacts before mitigation. Mitigation Measures AQ-2a through AQ-2d, GHG-1, GHG-2, and TRA-2 (and AQ-2e, if needed) would



reduce construction and combined emissions to below EDCAQMD's thresholds. However, conflicts with the Ozone Plan would remain because of required changes to the County General Plan. This impact would be cumulatively considerable even after implementation of all feasible mitigation.

New residents and adjacent sensitive receptors could be exposed to significant health risks from toxic air contaminants (TAC) during buildout of the CEDSP. LRVSP Policy 7.54 and Mitigation Measures AQ-2b, AQ-2c, and GHG-1 would reduce health risks to new receptors and help control TAC emission during construction. However, there may be instances where project-specific conditions preclude the reduction of health risks below EDCAQMD thresholds, indicating that the proposed project's contribution to existing ambient TAC health risks would be cumulatively considerable during construction. Operational sources of TAC would be minor and limited to new commercial uses developed under the project. LRVSP Policy 7.54 would also reduce cumulative exposure of new residents to ambient source of DPM. Accordingly, the project's contribution to operational TAC impacts would be less than cumulatively considerable, and this cumulative impact would be less than significant.

New and existing residents may also be exposed to naturally occurring asbestos (NOA) during construction, which might occur during the same period as other projects in the county. Possible cumulative NOA impacts as a result of these combined activities would be addressed by the standard EDCAQMD measures that apply to construction projects (e.g., Rule 223-2), in addition to project-level mitigation strategies identified for each project, including Mitigation Measure AQ-3. Accordingly, the project's contribution to NOA impacts would be less than cumulatively considerable, and this cumulative impact would be less than significant.

Vehicle trips from build-out of the LRVSP, in combination with existing and future traffic volumes, would not result in local cumulative impacts with respect to CO hot spots. CO hot spots are typically observed at heavily congested roadway intersections where a substantial number of gasoline-powered vehicles idle for prolonged periods throughout the day; however, modeling conducted at intersections with the highest traffic volumes and worst congestion shows that CO concentrations at these intersections would not be in excess of the CAAQS and NAAQS (see Section 3.2, *Air Quality*, Impact AQ-3c). Therefore, the cumulative impact would be less than significant.

Buildout of the LRVSP would not result in new or worsened odors that would affect a substantial number of people. Odors from diesel exhaust, architectural coatings, and cooking would be similar to those generated by the surrounding environment, which includes adjacent residential and commercial land uses, as well as traffic on US 50. Implementation of the project would not exacerbate existing odors associated with wastewater treatment at the Deer Creek WWTP. Accordingly, the project's contribution to odor impacts would be less than cumulatively considerable, and this cumulative impact would be less than significant.

## Biological Resources

As described in the *Aesthetics* discussion above, the El Dorado National Forest generally limits the eastward expansion of mixed-use development that is occurring and is likely to occur within the western portion of the County. Since the National Forest to the east would remain largely undeveloped, the cumulative context for biological resources would include only western El Dorado County, which comprises the central region of the County slated for development. The projects occurring in the western County include those identified in the planning horizon of the County General Plan and related projects (El Dorado Town Center Apartments, Rancho Dorado residential

development, Tilden Park subdivision, and the VMVSP). In combination, these projects will affect sensitive biological resources within the western County. Cumulative impacts for biological resources would occur where a project, when combined with cumulative projects, would contribute to a substantial loss of a sensitive biological resource, including sensitive natural communities, waters of the United States, and special-status species. Substantial loss can occur due to removing vegetation, filling drainages and wetlands, removing special-status plants, and take of special-status wildlife.

Implementation of the proposed project would result in direct, significant impacts on blue oak woodlands, riparian woodland, wetlands, and other waters and potential impacts on special-status plants and animals. At the project level, all impacts would be mitigated to a less-than-significant level. Impacts on riparian woodland, waters of the United States, and special-status plants would not be cumulatively considerable. However, the loss of blue oak woodlands and chaparral habitat for special-status wildlife species would be cumulatively considerable.

Simultaneous construction of other development projects in the vicinity of the project site could result in significant impacts on blue oak woodland and the common wildlife that use this habitat. Considering past, present, and future development in this region, a cumulative impact on blue oak woodlands exists in the region. Based on the criteria in the 2017 Oak Resources Management Plan (ORMP), the proposed project would retain 183 acres (69 percent) of oak woodland within the Open Space/Avoided areas and would incorporate measures to retain additional oak woodland within the development footprint. Approximately 82 acres (31 percent) of oak woodland is within the development footprint. Under the ORMP, the proposed project, and all future projects, would be required to mitigate all oak woodland impacts at a 1:1 ratio where 50 percent or less of on-site oak woodlands are affected. Since the replacement plantings will not account for more than 50 percent of the oak woodland mitigation requirement, half of the project's mitigation requirement would consist of replacement plantings onsite. The remaining half of the project's oak woodland impact mitigation would be implemented in the form of an in-lieu fee payment to the County. The proposed project and all future projects would also be required to replace individual native oak trees based on an inch-to-inch replacement standard, and Heritage Tree replacement based on a 3:1 ratio standard. As a result, project compliance with CEQA and the ORMP would reduce the proposed project's contribution to cumulative effects on oak woodlands and the associated wildlife species. However, the planted trees and acorns would require many years to attain maturity and to function similarly to the existing oak woodland. Due to the large extent of oak woodland to be removed and the long-term impact due to the time for planted trees to mature, this impact on oak woodland would be cumulatively significant and unavoidable.

The proposed project would also result in the removal of 0.286 acre of riparian woodland, which provides habitat for nesting birds, tree-roosting bats, and other native wildlife species; however, avoidance, minimization, and compensatory mitigation for this impact would reduce the project impact to a less-than-significant level. Many of the past, present, and future development projects would also result in loss of riparian habitat, resulting in a cumulative impact. However, because the proposed project would affect a relatively small acreage of riparian habitat and mitigation would fully compensate for the loss, the project would not make a considerable contribution to this cumulative impact.

The proposed project would also result in the removal of waters of the United States, including 0.536 acre of wetlands and 0.365 acre of other waters; however, avoidance, minimization, and compensatory mitigation for this impact would reduce the project impact to a less-than-significant

level. Many of the past, present, and future development projects would also result in loss of waters of the United States, resulting in a cumulative impact. However, because the project would affect a relatively small acreage of waters of the United States, and mitigation would fully compensate for the loss, the project would not make a considerable contribution to this cumulative impact.

The proposed project could affect a population of a federally listed plant, Layne's ragwort. However, implementation of avoidance and minimization measures would avoid this impact and the project would have no contribution to cumulative impacts on this species. The project would also have direct effects on a locally rare, California Rare Plant Rank 3.2 species, Bisbee Peak rush-rose. Other past, present, and future development projects in the region would also remove this plant, resulting in a cumulative impact. However, implementation of mitigation to compensate for this loss by creating and planting additional habitat in the chaparral within open space in the project area would fully compensate for the loss, and the project would not make a considerable contribution to this cumulative impact.

The proposed project would also remove substantial areas of chaparral, which provides habitat for Blainville's horned lizard, a California species of special concern. Little is known about the distribution of Blainville's horned lizard in El Dorado County; however, past, present, and future development in the Sierra Nevada foothills is expected to affect horned lizard populations not only from the reduction of available habitat, but from the introduction of domestic cats into these rural habitats resulting in a cumulative impact (Jennings and Hayes 1994). The development of residential housing and associated population increase would result in a considerable contribution to cumulative impacts on Blainville's horned lizard in the region. This impact would be cumulatively significant and unavoidable.

Implementation of the proposed project would further restrict wildlife movement between fragmented patches of suitable habitat in the County. The cumulative projects in the area would also restrict wildlife movement in the same way, resulting in a cumulative impact. The project area is large and, although open space is planned for a portion of the project area, a large area would be developed. Therefore, the proposed project's contribution to this cumulative impact would be cumulatively considerable, despite implementation of mitigation measures. This cumulative impact on wildlife movement corridors would be significant and unavoidable.

## Cultural Resources

The area considered for cumulative impacts on cultural resources is based on past cultural boundaries and can vary depending on the period. Generally, for precontact resources, the area examined for cumulative impacts can be defined as the ethnographic area of the Native American groups most likely associated with potential resources. For this project, the ethnographic area consists of the drainages of the lower Feather, Yuba, Bear, and American Rivers, between the Sacramento River and the crest of the Sierra Nevada mountains. For historic resources, the cultural area could be somewhat narrower, comprising the foothills of the Sierra Nevada mountains, extending to the city of Sacramento.

Implementation of the proposed project could result in direct impacts on contributing elements of a historic district and three known archaeological resources that are historical resources. In addition, there is the potential for currently unknown cultural resources to be adversely affected by the proposed project. These impacts, however, would be avoided or minimized through project design

and implementation of mitigation measures that would reduce these impacts to a less-than-significant level.

Construction of other development projects in the vicinity of the proposed project could result in significant impacts on archaeological resources that meet the criteria for historical resources and human remains, should they be present in the project site or the vicinity of the project site. Compliance with state law, including identified mitigation measures, would reduce project-level effects to a less-than-significant level.

Despite the implementation of mitigation required by state law and protection measures for cultural resources in the County General Plan and zoning ordinance, based on the size and scope of the cumulative projects and the largely undisturbed nature of their locations, there likely would be a cumulative impact on cultural resources. Project impacts on the Lime Rock Valley Historic District would not constitute a contribution to a cumulative impact because the resource is unique in the area and there would be no cumulative impact on mining company towns in the area. There is likely a cumulative impact on precontact archaeological resources, based on the above factors and the presence of archaeological districts in the vicinity. While the construction of the project would contribute to the cumulative impact on precontact resources in the area, the impacts are minimal and with the implementation of mitigation measures to even further reduce the project's impacts, the contribution would not be considerable. This impact would be less than significant.

## Geology, Soils, Minerals, and Paleontological Resources

### Geology and Soils

The proposed project has a variety of site-specific geological and soil concerns, specifically seismicity, soil erosion, expansive soils, and potentially fracturing bedrock to create appropriate conditions for construction and foundations. Individual impacts can be reduced to a less-than-significant level by project-specific geotechnical investigation, seismic design standards promulgated by the County building codes and ordinances, and by implementing Mitigation Measure GEO-4. The geology and soil impacts are specific to the geographic location of the physical resource and can be mitigated depending on those site-specific conditions. Because these impacts are specific to their geographic location, they are not a cumulative concern. Past, present, and future development impacts would not accumulate with the site-specific impacts of the proposed project.

For individual projects, site-specific soil erosion would be reduced to a less-than-significant level by development and implementation of a stormwater pollution prevention plan (SWPPP), adherence to the applicable County grading ordinance, subdivision ordinance, *County of El Dorado Design and Improvement Standards Manual* (El Dorado County 1990), and *County of El Dorado Drainage Manual* (County Drainage Manual) (El Dorado County 2020) requirements, and adherence to the recommendations to minimize erosion, runoff, and sedimentation contained in the required site-specific geotechnical report. See *Hydrology, Water Quality, and Water Resources* below for additional information. The cumulative impact would be less than significant.

### Minerals

Implementation of the proposed project could affect known important mineral resources of value to the region or residents of the state, although at a less-than-significant level. Effects of future development on mineral resources that are currently in operation are unlikely as these sites are identified in the County General Plan and have established buffer zones. New mineral resources

might be found in mineral resource zones (MRZs) with MRZ-3 and MRZ-4 designations where new and unanticipated mineral development could be proposed. New mineral resource development would undergo environmental and public review, which might prevent or substantially reduce their development. Consequently, there is the potential for a cumulative impact relative to the availability of important mineral resources. However, the potential for the proposed project to impede access to important mineral resources is minimal, as described in Chapter 3, Section 3.5, *Geology, Soils, Minerals, and Paleontological Resources*. Therefore, the proposed project would not result in a considerable contribution to a cumulative impact. This impact would be less than significant.

## Paleontological Resources

Implementation of the proposed project could contribute to regional impacts on paleontological resources. Construction would take place in geologic units sensitive for paleontological resources, such as the limestone deposits and Quaternary alluvium, which are the units of highest sensitivity in the project area. More than 3,000 records of vertebrate fossils are known from limestone caves in the County, and three records of vertebrate fossils are known from Quaternary units in the County (University of California Museum of Paleontology 2013). Although the cave fossils were not discovered in connection with construction, the discovery of fossils in the Quaternary units likely occurred during construction activities and likely indicates that past development has encountered paleontological resources. Future development can be reasonably expected to disturb additional fossils where sensitive geologic units are present because even localized excavation could damage or destroy important paleontological resources. The greater the extent of excavation, the greater the potential impact on paleontological resources.

The proposed project would result in grading and excavation of portions of the project site, thereby creating the potential to contribute to the cumulative damage or destruction of important paleontological resources in the region. Combined with other past, present, and probable future projects and programs in the region, construction associated with the proposed project could result in a cumulative impact on paleontological resources. However, implementation of Mitigation Measures GEO-9a, GEO-9b, and GEO-9c identified in this EIR will ensure that the project's contribution to any cumulative impact would not be considerable. This impact would be less than significant.

## Greenhouse Gas Emissions

Climate change is a global problem, and GHGs are global pollutants, unlike criteria air pollutants (such as ozone precursors, which are primarily pollutants of regional and local concern). Given their long atmospheric lifetimes, GHGs emitted by numerous sources worldwide accumulate in the atmosphere. No single emitter of GHGs is large enough to trigger global climate change on its own. Rather, climate change is the result of the individual contributions of past, present, and future sources. Therefore, GHG impacts presented in Section 3.6, *Greenhouse Gas Emissions*, are inherently cumulative.

As discussed in Section 3.6 although the LRVSP has a diverse suite of strategies that target area and energy source emissions, many of the measures are voluntary, and there is no guarantee that the action would be incorporated into the project design of all future development. Development under the LRVSP would also generate new vehicle trips, which could conflict with the state's goal to reduce regional per-capita VMT. Construction would result in annual GHG emissions from equipment and vehicles.

Mitigation Measures GHG-1, GHG-2, TRA-2, AQ-2b, and AQ-2c are required to reduce GHG emissions generated during construction and operation of the LRVSP. The purpose of these measures is to require specific project GHG emission reductions consistent with California GHG-reduction targets required in SB 32 for 2030, and to support long-term reductions consistent with the need to eventually reach carbon neutrality statewide pursuant to AB 1279. However, because of the long-term buildout of the project, the availability, affordability, and enforceability of specific GHG reduction strategies (including GHG credits) in the future is unknown. Thus, this EIR conservatively finds that the contribution of GHG emissions associated with the project to cumulative GHG emissions would not be reduced to a less-than-significant impact and could substantially contribute to a significant cumulative impact. This impact would be significant and unavoidable.

## Hazards and Hazardous Materials

Construction of development projects, in general, requires use of heavy construction equipment (e.g., excavators, backhoes, grading machines, asphalt machines), the operation and maintenance of which would involve the use and handling of hazardous materials, including diesel fuel, gasoline, lubricants, and solvents. Simultaneous construction of the proposed project and other development projects in the vicinity of the project site could result in significant hazards to the public through the routine transport, use, or disposal of hazardous materials, or the release of hazardous materials into the environment. However, compliance with best management practices (BMPs), and federal, state, and county regulations regarding hazardous materials would minimize the potential for an accidental release of hazardous materials during construction or operation. With the implementation of standard safety measures, the proposed project's contribution to any cumulative impact would not be considerable.

The El Dorado Hills area is at a moderate to high risk for wildland fire hazards. The proposed project and the cumulative projects would introduce new fire hazards or risk to people and structures in the project area. However, existing regulations would be in place to minimize fire hazards. To comply with the County General Plan and fire hazard ordinances, development projects are required to take steps to minimize fire risk. These steps include maintaining defensible space and fire code requirements, as well as ensuring adequate water supply and preparing a wildfire safety plan. Project development would generally be limited to slopes less than 30 percent, and winds are generally mild; therefore, the project would not exacerbate wildfire risks. Because the proposed project, along with all other development projects, would be required to comply with County General Plan Goals 5.7 and 6.2 (which require that projects address protection of life and property through minimization of fire hazards and risks in wildland and developed areas), the El Dorado County Fire Hazard Ordinance, the Vegetation Management and Defensible Space Ordinance (Adopted April 30, 2019), no cumulative impact would result and therefore, there is no cumulative impact to which the project could contribute.

## Hydrology, Water Quality, and Water Resources

This analysis focuses on cumulative impacts on groundwater, flooding, and water quality effects (both construction and long-term effects) within the greater Cosumnes River and Deer Creek watersheds. There would be no depletion of groundwater supplies or interference with groundwater recharge because the project area is underlain by bedrock and groundwater recharge potential would be limited. In addition, the proposed project would not construct or use groundwater resources.

## Hydrology

Cumulative development would alter drainage patterns through the conversion of undeveloped land to developed uses. This would result in an increase in impervious surfaces, which would change the rate and volume of stormwater runoff across the project site, as well as contribute flows to local creeks and streams that drain the various locations. Increased water levels in local creeks and streams resulting from stormwater runoff have the potential to cause flooding. In locations where a 100-year flood hazard risk exists, flooding could be exacerbated. The County's Subdivision Ordinance requires drainage plans be submitted prior to the approval of tentative maps. The drainage analysis must include an analysis of upstream, onsite, and downstream facilities, and offsite drainage facilities. Tentative maps must include details on the location and size of proposed drainage structures. The County's Drainage Manual provides standards for design of drainage improvements. As a performance standard, measures must be implemented to provide for no net increase in peak stormwater discharge relative to current conditions to ensure that 100-year flooding and its potential impacts are maintained at or below current levels and that people and structures are not exposed to additional flood risk. The County also regulates development within the 100-year floodplain under its Flood Damage Prevention Ordinance to ensure development does not increase flood risk or expose new uses to flood hazards. All cumulative projects would be required to comply with these requirements and standards.

The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems because post-development flows would be attenuated via a detention basin within the VMVSP project area, or if the VMVSP is not constructed prior to or concurrent with the LRVSP, then a detention basin would be constructed in an area designated as Open Space in the central area of the project site. Either method would attenuate peak stormwater runoff to a level that does not affect downstream facilities. Cumulative hydrology impacts would be less than significant, and the project's contribution would not be cumulatively considerable.

## Water Quality

Construction activities in the greater Cosumnes River and Deer Creek watersheds could cumulatively increase sediment loading, thereby negatively affecting water quality if measures are not implemented to control the amount of sediment potentially carried to waterways. New development activities in these watersheds, including the proposed project, would involve soil disturbance through such activities as vegetation removal, grading, and excavation. These disturbances would expose the native soil to wind- and water-generated erosion, most likely at accelerated rates. As such, surface runoff could transport increased sediment loads. Sediment from erosion can have short- and long-term water quality effects including increased turbidity, which could result in adverse impacts on fish and wildlife habitat, reduced efficacy of diversion structures, impaired recreation and aesthetic values, and increased downstream flood hazards due to a decrease in channel capacity. Erosive conditions created during grading activities can persist well into the post-construction timeframe. The amount and rate of erosion is variable and depends on a variety of factors, including soil characteristics (e.g., susceptibility to erosion), the time of year of construction activities, the intensity and duration of precipitation, the amount of vegetative cover, and other variables. Another potential source of water quality impairment during construction activities is the accidental release of petroleum-based fluids used in heavy equipment and machinery or from construction materials that contain hazardous materials and/or heavy metals.

All project applicants would be required to apply for coverage and comply with the various federal, state, and local permit requirements described in Chapter 3, Section 3.8, *Hydrology, Water Quality, and Water Resources*. Among these is the General NPDES Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit), which requires the development and implementation of a SWPPP. The project applicant would be required to prepare and retain a SWPPP at each construction site, describing the characteristics of the site, erosion and sediment control strategies, means of waste disposal, implementation of approved local plans and permit requirements, control of postconstruction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. In addition, other federal and state permit requirements (including waste discharge requirements [WDRs] for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems General Permit No. CAS000004 [Order 2013-001-DWQ] [Small MS4 Permit]) regulate water quality impacts. Finally, local ordinances (including the County Grading, Erosion, and Sediment Control Ordinance [Grading Ordinance]) require minimization of impacts from site modification activities.

Other developments in the region are also required to comply with the requirements above, reducing potential water quality impacts. Therefore, because all projects will comply with these measures to protect water quality, no cumulative impact is anticipated.

Post-construction cumulative water quality effects could be expected from continued development in the greater Cosumnes River and Deer Creek watersheds. These developments could increase urban contaminant loading, which would adversely affect water quality. Development in the greater Cosumnes River and Deer Creek watersheds, including the proposed project, would result in increased impervious surfaces that increase the rate and amount of runoff which, in turn, could adversely affect existing water quality. The primary sources of pollution include runoff from roadways and parking lots, runoff from landscaped areas, industrial activities, non-stormwater connections to local drainage systems, accidental spills, and illegal dumping.

Proper measures to maintain water quality after construction would be required by the County. Source and treatment control measures contained in the County's stormwater management plan (El Dorado County 2004) and the County Drainage Manual (El Dorado County 2020) and/or the U.S. Environmental Protection Agency (USEPA) and other related guidance documents would be implemented. General site housekeeping and design control measures incorporated into the project design can include conserving natural areas, protecting slopes and channels, and minimizing impervious areas. Treatment control measures may include use of vegetated swales and buffers, detention basins, wet ponds, or constructed wetlands, infiltration basins, and other measures. For example, the State Water Resources Control Board (State Water Board) is advancing low impact development (LID) in California in various ways. LID technology incorporates site design and stormwater management to maintain the site's pre-development runoff rates and volumes. Examples of LID measures include sidewalk storage, vegetated swales, buffers and strips, tree preservation, permeable pavers, and impervious surface reduction and disconnection. Selection and implementation of these measures would occur on a project-by-project basis depending on project size and stormwater treatment needs. Success criteria and performance standards would be developed in conjunction with the County. These measures can also help comply with the Central Valley Regional Water Resources Control Board (Central Valley Water Board) *Water Quality Control Plan for the California Regional Water Quality Control Board Central Valley Region* (Basin Plan), which specifies water quality objectives and beneficial use requirements.



Although post-construction runoff entering water bodies as a result of the proposed project is not anticipated to increase over pre-project conditions, the proposed project, along with other developments, would contribute to urban contaminant loading, resulting in a cumulative impact. However, mitigation measures would result in the treatment of most contaminants and would reduce the proposed project's contribution to postconstruction water quality impacts to less than cumulatively considerable. The cumulative impact would be less than significant.

## Water Resources

Water supply for the cumulative projects would be supplied by the El Dorado Irrigation District (EID), which currently does not use groundwater as a supply source. There would be no depletion of groundwater supplies or interference with groundwater recharge because the proposed project area is underlain by bedrock and groundwater recharge potential would be limited. In addition, the proposed project would not use groundwater resources. There would be no cumulative impact on groundwater resources. For the analysis of cumulative water supply effects associated with surface water supplies, see *Public Services and Utilities*.

## Land Use Planning and Agricultural Resources

No areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance occur on the project site; therefore, there would be no impact. All but one parcel in the project site is currently zoned Rural Lands. The proposed project includes rezoning the project site to eliminate this zoning. The Rural Lands zone is intended to identify those lands that are suitable for limited residential development and lands that supplement agricultural uses. Therefore, the rezoning of project site parcels from the Rural Lands zone to provide for low- and medium-density residential development would not result in a conflict with existing zoning for agricultural use and no impact would occur.

A number of other proposed projects in the County involve rezoning substantial areas of land from agricultural zoning to non-agricultural (residential) zoning, specifically the Bass Lake North, and Diamond Dorado projects. The rezoning associated with the proposed project would not contribute to a cumulative impact associated with the development for non-agricultural uses of lands zoned for agriculture in the County because the project site parcels are primarily zoned Rural Lands, with one parcel zoned Open Space. The Rural Lands zone is intended primarily for residential uses.

As described in Chapter 3, Section 3.9, *Land Use Planning and Agricultural Resources*, because the project site is not now within a Community Region, the proposed project would be inconsistent with the County General Plan goals of focusing development within Community Regions. However, County General Plan Policy 2.1.1.6 provides that the boundaries of existing Community Regions may be modified through the County General Plan amendment process, and the proposed project includes a general plan amendment to expand the boundaries of the El Dorado Hills Community Region to include the project site. Therefore, the proposed project's incremental contribution to cumulative County General Plan land use inconsistency impacts associated with the development of lands outside Community Regions would not be cumulatively considerable.

The project site is not subject to any habitat conservation plan or natural community conservation plan; therefore, the proposed project would not contribute to cumulative conflicts with applicable habitat conservation plans or natural community conservation plans.

No forest land or timberland exists on the project site or vicinity, and the proposed project would not divide a community. The proposed project would not contribute to the cumulative impacts related to these issues.

## Noise and Vibration

Construction noise and vibration are localized and temporary and primarily affect the land uses in the immediate vicinity of the construction equipment. Thus, no cumulative impact from project-related construction noise is anticipated.

Table 5-3 summarizes traffic noise modeling results under cumulative conditions with and without the proposed project and shows the incremental increase in traffic noise associated with the project. In almost all cases, traffic noise exceeds the County's land use compatibility standards for residential uses ( $L_{dn}$  60 decibels [dB] for low density and  $L_{dn}$  65 dB for high density). As such, significant cumulative traffic noise impacts are considered to occur along these roadways where there are adjacent residential uses, because the existing noise levels already exceed the compatibility standards, and the proposed project would result in additional sensitive land uses being exposed to excessive noise. Mitigation Measure NOI-1b would reduce the amount of cumulative noise that sensitive land uses would be exposed to a less-than-significant level. Therefore, the proposed project would not result in a cumulatively considerable contribution of noise on new sensitive land uses constructed as part of the project.

In some locations the proposed project is predicted to reduce traffic noise levels. In other locations the proposed project is predicted to increase traffic noise by up to 0.7 dB. An increase of 0.7 dB is expected on Marble Valley Road, east of Marble Ridge Road, where there is a single existing residence adjacent to the roadway. The next highest increase in noise is 0.5 dB. An increase of 3 dB is generally considered to be the threshold of a perceptible increase in noise, while an increase of 5 dB is considered clearly noticeable. An increase of 0.7 dB would not be perceptible. In addition, as discussed in Chapter 3, Section 3.10, *Noise and Vibration*, County General Plan Policy 6.5.1.12 sets the noise increments that would be considered significant. Because the cumulative noise at Marble Valley Road, east of Marble Ridge Road, without the proposed project would be above 65 dB, the significant noise increment for this location would be 1.5 dB. The increase of 0.7 dB, therefore, would not exceed 1.5 dB and would not be considered a significant increase. Thus, the proposed project's incremental contribution to significant cumulative noise impacts would not be cumulatively considerable.

**Table 5-3. Cumulative Traffic Noise on Roadway Segments in the Project Area Vicinity**

Roadway	Segment Location	Cumulative $L_{dn}$ (dBA) at 50 Feet from Roadway Centerline	Cumulative + Project $L_{dn}$ (dBA) at 50 Feet from Roadway Centerline	Change in Traffic Noise due to Specific Plan-Generated Traffic (dBA)
Bass Lake Road	Green Valley Road to Bridlewood Drive	65.2	65.4	0.2
	Bridlewood Drive to Serrano Pkwy	67.6	67.7	0.1
	Serrano Pkwy to Hollow Oak Drive	70.7	70.6	-0.1
	Hollow Oak Drive to Country Club	73.0	72.9	-0.1
	Country Club Drive to US 50	73.3	73.3	0.0
Cambridge Road	Green Valley Road to Oxford	63.8	63.8	0.0

Roadway	Segment Location	Cumulative L <sub>dn</sub> (dBA) at 50 Feet from Roadway Centerline	Cumulative + Project L <sub>dn</sub> (dBA) at 50 Feet from Roadway Centerline	Change in Traffic Noise due to Specific Plan-Generated Traffic (dBA)
	Oxford to Knollwood Drive	65.6	65.7	0.1
	Knollwood Drive to Country Club	65.9	66.0	0.1
	Country Club to US 50	68.8	69.0	0.2
Flying C Road	Crazy Horse Road to Deer Creek Road	66.3	66.8	0.5
Cameron Park Drive	Green Valley to Alhambra	68.3	68.3	0.0
	Alhambra to Oxford	70.6	70.7	0.1
	Oxford to Hacienda Drive	71.7	71.7	0.0
	Hacienda Drive to US 50	72.5	72.5	0.0
Country Club Drive	Bass Lake to Merry Chase Drive	66.9	66.9	0.0
	Merry Chase Drive to Knollwood	63.7	63.8	0.1
	Knollwood to Cambridge	63.3	63.3	0.0
	Cambridge to Royal	60.1	60.1	0.0
	Royal to Cameron Park Drive	60.9	60.9	0.0
Durock Road	US 50 to Business Drive	67.2	67.3	0.1
	Business Drive to S. Shingle	65.2	65.3	0.1
Marble Valley Road	East of Marble Ridge Road <sup>a</sup>	75.4	75.8	0.4
Shingle Lime Mine Road	South of Durock Road	49.5	49.5	0.0
Amber Fields Drive	North of S. Shingle Road	51.4	51.4	0.0
S. Shingle Road	US 50 to Amber Fields Drive	67.0	67.0	0.0
	Amber Fields Drive to Latrobe Road	60.0	60.0	0.0
US 50	West of Latrobe/El Dorado Hills	83.8	83.8	0.0
	Between EDH and Silva Valley	83.3	83.4	0.1
	Between Silva Valley and Bass Lake	83.5	83.5	0.0
	Between Bass Lake and Cambridge	82.9	82.9	0.0
	East of Cambridge	83.4	83.4	0.0

Source: ICF and Federal Highway Administration Traffic Noise Model 2.5 Lookup Tables.

<sup>a</sup> Traffic on this roadway was estimated using intersection data, as roadway segment volume data were available. Traffic volumes for the P.M. peak hour that would pass through the eastbound segment of the intersection were summed and inputted into the Traffic Noise Model 2.5 Lookup Tables.

US 50 = U.S. Highway 50.

EDH = El Dorado Hills.

## Population and Housing

Implementation of the LRVSP would result in development of up to 800 single-family residential units, housing approximately 2,336 residents, about 1.2 percent of the County's 2020 population. As described above, development within the planning horizon of the County General Plan is expected to result in an unincorporated County population of 317,692 people. Using the existing household size of 2.21 persons, the other projects (Table 5-2) would be expected to increase the County's population by up to 8,356 additional residents, resulting in a cumulative total population, without the proposed project, of 326,048 in unincorporated El Dorado County. However, as the existing 398-unit Marble Valley development agreement—housing an estimated 1,031 people—would be replaced by the proposed VMVSP's 3,236 units (8,381 people), the cumulative-without-project

population would be approximately 333,398. Development under the LRVSP could add 2,336 residents to that total, for a cumulative-plus-project population of 335,734 people. Therefore, buildout of the LRVSP would not be expected to constitute a considerable contribution to cumulative population growth in the County. However, population growth in and of itself does not constitute a physical environmental impact. As described in this chapter, household and population increases would make substantial contributions to cumulative physical environmental impacts on other resources, including conversion of open space resources; criteria pollutant emissions in excess of the EDCAQMD thresholds; loss of blue oak woodland and chaparral habitat; impacts to Blainville's horned lizard; loss, disturbance, or interference with precontact archaeological resources; increased demand on public services including wastewater treatment capacity; and decreased effectiveness of the transportation system.

The project area currently contains six housing units. Therefore, development of the project sites as proposed would contribute to the cumulative displacement of existing housing units and people; however, as the proposed project would create additional housing in excess of six units it would not necessitate the construction of replacement housing elsewhere. The proposed project would not make a considerable contribution to the cumulative displacement of existing housing units.

## Public Services and Utilities

### Fire and Police Protection, Schools, and Libraries

The area considered for cumulative impacts for public services and utilities is the service area for these providers. Buildout of the proposed project would result in the construction of 800 housing units, including both single-family and duplex units. The proposed project would not result in substantial adverse physical impacts associated with new governmental facilities or a need for new governmental facilities, including potential impacts on fire and police protection, schools, and libraries.

The proposed project would not create a need for new fire or sheriff protection facilities. In accordance with Policies 5.7.1.1, 5.7.3.1, and 5.7.4.1 of the County General Plan, prior to approval of all new development, the project applicant must obtain review and approval of development plans by emergency service providers to ensure adequate levels of service and access. Because all new development in the County must comply with these policies, there would be no cumulative impact to which the proposed project could contribute.

The proposed project is expected to result in 800 households, which could generate approximately 542 school-age children, as described in Chapter 3, Section 3.12, *Public Services and Utilities*. While other anticipated projects would also result in an increase in population within the school district, which would likely include school-age children, all development incurs taxes to compensate for increased population and expansion of school facilities, as necessary. The El Dorado Union High School District and the Buckeye Union School District collect taxes via the El Dorado Schools Financing Authority Community Facilities District, which provides funds for capital facilities to serve students generated from the new development (SchoolWorks 2018). Therefore, increases in school enrollment would not contribute to cumulative impacts associated with the provision of new or physically altered government facilities.

The cumulative impact area for libraries comprises the communities of Cameron Park and El Dorado Hills, as library use is generally local. As described in Chapter 3, Section 3.12, *Public Services and Utilities*, the typical standard threshold used for planning purposes is a minimum of 0.5 square feet

of library space per capita (EDAW 2003a; Amos pers. comm.). Within the project vicinity of El Dorado Hills, the library square footage per capita of 0.32 does not meet the planning standard of 0.5. The proposed project would decrease the standard library planning ratio from a current ratio of 0.32 square feet per capita in El Dorado Hills to 0.31 square feet per capita, which is below the ratio for El Dorado Hills. The proposed project would also decrease the standard library planning ratio from a current ratio of 0.68 square feet per capita in Cameron Park to 0.61 square feet per capita, remaining above the countywide average of 0.35 square feet per capita. With cumulative projects, including the El Dorado Hills Specific Plan, the ratio would likely be reduced below 0.35. However, the reduction of library square footage does not constitute an environmental impact. The two closest libraries to the project area are the Cameron Park and the El Dorado Hills libraries. The proposed project and other development projects within El Dorado Hills would not likely result in the physical degradation of library facilities, and therefore no cumulative impact is anticipated.

## Water Supply

As shown in Chapter 3, Section 3.12, *Public Services and Utilities*, Table 3.12-7, the proposed project is expected to require 573 acre-feet of water per year. The proposed project, combined with existing and proposed development in the EID service area would result in a total projected demand for 67,295 acre-feet of water in 2035. Excluding recycled supplies, EID's secured water rights and entitlements available for the proposed project total 67,190 acre-feet, which would be insufficient to serve the future demand of the proposed project and all planned future projects. However, in addition to the secured water rights and entitlements, EID has planned water assets. These consist of two additional water supplies from the El Dorado County Water Agency (EDCWA) for use within its service area to make available for the proposed project: (1) water under the El Dorado-Sacramento Municipal Utility District (SMUD) Cooperation Agreement, and (2) a Central Valley Project (CVP) water entitlement derived from EDCWA Fazio water supply. Upon State Water Board approval, the El Dorado-SMUD Cooperation Agreement would provide EID with 30,000 acre-feet per year (AFY) of water through 2025 and 40,000 AFY thereafter. The EDCWA Fazio water could provide EID with an additional 7,500 AFY of water from Folsom Reservoir; however, with EID's existing water rights, there is no near-term plan to use the Fazio water (Appendix H, *Water Supply Assessment*:4-8). At some point in the future EID may enter into an Agreement with EDCWA to use up to 7,500 AFY of that water. These planned water assets, although partially secured, are not yet fully available for EID's use. In normal years, the water supplies under these planned assets total 37,500 AFY. In dry years, the water supplies under these planned assets total 10,625 AFY (Appendix H:4-15). EID's water supplies associated with the entire secured and planned water assets total 110,290 AFY. See Section 3.12, *Public Services and Utilities* for additional details about EID's existing and planned water supplies. Therefore, considering the planned water assets, the water supply assessment (WSA) (Appendix H, *Water Supply Assessment*, of this EIR) concludes that EID should have sufficient water available to meet the needs of the proposed project and all other demands in its service area through 2035 and that no new or expanded entitlements would be needed. Therefore, there would be no cumulative impact on water supply and the project would not make a considerable contribution to any cumulative water supply impacts.

## Wastewater

EID provides wastewater service for the project area and, therefore, the cumulative analysis focuses on proposed development within the EID service area, which corresponds to the County. EID projects that the Deer Creek WWTP will approach permitted capacity in 2029 based on the County

General Plan planning horizon and estimates of areas for future known and unknown densities (El Dorado Irrigation District 2013b). EID has determined a capacity of 5.0 million gallons per day (mgd) for the Deer Creek WWTP will be necessary to accommodate future flows and plans to expand the facility by 2029 (El Dorado Irrigation District 2013b:16).

Table 5-4 describes the related projects, as listed in Table 5-2, which are not included in the County General Plan and, therefore, not included in EID’s projections, but if approved, would generate wastewater that would be treated at the Deer Creek WWTP. Because the project area is already zoned for residential and included in the County General Plan, the expected wastewater that would be generated from that zoning is replaced with the amount of wastewater expected from the proposed project.

**Table 5-4. Wastewater Service Demand from Related Projects in Deer Creek WWTP Zone**

Land Use	Unit	Wastewater Generation Rate (gpd/EDU or gpd/acre)	Total Predicted Wastewater (gpd)
Residential (Tilden Park)	14 dwelling units	240 gpd/EDU <sup>a</sup>	3,360
Commercial (Tilden Park)	8.22	500 gpd/EDU	4,110
Village of Marble Valley Specific Plan (as calculated in VMVSP EIR)			803,220
<b>Total</b>			<b>810,690 gpd/0.8 mgd</b>

Source: El Dorado Irrigation District 2013b.

<sup>a</sup> This estimate is calculated based on a conservative generation rate of 240 gallons per day(gpd)/equivalent dwelling unit (EDU), which is used for low-, medium-, and high-density residential units. A lower generation rate would be used for multifamily homes. If these Related Projects consist of any multifamily homes, this calculation will overestimate the wastewater generated.

EIR = environmental impact report.

gpd/EDU = gallons per day/equivalent dwelling unit.

mgd = million gallons per day.

As shown in Table 5-5, the expected flow of 5.0 mgd into the Deer Creek WWTP includes zoning for the existing plan area, which totals 0.01 mgd. After subtracting that, adding in the 0.19 mgd expected under the LRVSP, and the projected wastewater that would be generated from the related projects listed in Table 5-2 and treated at the Deer Creek WWTP, total wastewater generation would total 5.18 mgd. This would exceed the planned and permitted capacity of 5.0 mgd. The EID Wastewater Facilities Master Plan will be amended in 2020 and County General Plan amendments will be reviewed and used as a basis for analysis of future needs. As a standard practice, EID monitors growth and plans to meet community needs. If the LRVSP is approved by the County Board of Supervisors, the next revisions to the EID Wastewater Facilities Master Plan will reflect updated future demand calculations. County General Plan amendments will be reviewed and used as a basis for analysis of future needs to identify what improvements would be required to accommodate additional flows and the timing for when such improvements would be necessary. EID’s current estimate for plant expansion to 5.0 mgd by 2029 is within the facility planning assumptions evaluated in the certified *Deer Creek Wastewater Treatment Plant Expansion Environmental Impact Report* (Deer Creek WWTP Expansion EIR) (El Dorado Irrigation District 1998), which assumed expansion up to 10.0 mgd. Although the proposed project would contribute incrementally to the need for expansion, it would not result in changes to the construction and operational assumptions and associated environmental impacts beyond those identified in the Deer Creek WWTP Expansion

EIR. In addition, mitigation measures identified in the Deer Creek WWTP Expansion EIR to reduce or avoid potential impacts of expansion would be implemented by EID. The proposed project's contribution to the demand for wastewater facilities would not be the sole reason for WWTP expansion and would be less than cumulatively considerable.

**Table 5-5. Future Wastewater Generation for the Deer Creek WWTP**

Land Use	Wastewater for Deer Creek WWTP (mgd)
Existing ADWF	2.64
Future Unplanned Density ADWF	2.25
Future Planned Density ADWF (including 0.09 for Marble Valley 395 EDUs)	0.11
Expected Total for 2025	5.0
Existing plan area (56 EDUs, Low Density Residential) <sup>a</sup>	-0.01
Proposed LRVSP	0.19
Expected Total with LRVSP	5.18
Related Projects from Table 5-4 (including Revised VMVSP)	1.06
Total Expected Wastewater in 2029	6.24

Source: El Dorado Irrigation District 2013b:93.

<sup>a</sup>  $56 \times 240 \text{ gpd} / 1,000,000 = 0.01 \text{ mgd}$ .

WWTP = wastewater treatment plant.

mgd = million gallons per day.

ADWF = average dry weather flow.

EDU = equivalent dwelling unit.

LRVSP = Lime Rock Valley Specific Plan.

gpd = gallons per day.

## Solid Waste

The area examined for cumulative conditions for solid waste is El Dorado County. Construction of cumulative projects and the proposed project would result in solid waste generation. The County's existing Construction and Demolition Debris Diversion Ordinance requires project applicants and their construction contractors to reuse or recycle a minimum of 50 percent of the construction and demolition debris.

**Table 5-6. Waste Calculations for Expected Projects**

Project	Dwelling Units	Anticipated Residents <sup>a</sup>	Total Waste (tons per year) <sup>b</sup>
Marble Valley Specific Plan	3,236	8,381	5,615
Rancho Dorado	185	479	321
Tilden Park	14	36	24
<b>Total</b>	<b>3,435</b>	<b>8,896</b>	<b>5,960</b>
Lime Rock Valley Specific Plan <sup>c</sup> (as described in Impact PSU-7)			1,388
Total waste projection (per year/per day)			7,348 per year, 22.4 per day

<sup>a</sup> As described in Chapter 3, Section 3.12, *Public Services and Utilities*, El Dorado County's average household size = 2.59 average people per EDU.

<sup>b</sup> The average solid waste disposal projection for El Dorado Hills is 0.67 ton per person (El Dorado County Environmental Management Department 2012).

- <sup>c</sup> As calculated in Section 3.12, *Public Services and Utilities*, this solid waste projection is likely overestimated because it does not account for recycling diversions.

As described in Chapter 3, Section 3.12, *Public Services and Utilities*, the proposed project could generate a total of 1,388 tons of solid waste per year (or approximately 3.8 tons per day). As shown in Table 5-6, projected solid waste for the proposed project and other related projects would total 7,348 tons per year (or approximately 22.4 tons per day). That waste would be diverted to the Diamond Springs Material Transfer Facility in El Dorado County, with the remaining waste that could not be diverted sent to either Lockwood Landfill or Potrero Hills Landfill. The Diamond Springs material recovery facility can process 400 tons of waste per day, and currently processes approximately 70 tons per day (Ross pers. comm.). Therefore, the additional 22.4 tons expected from proposed and expected projects would still be well below capacity for this facility. The Potrero Hills Landfill can accept 4,330 tons per day. In 2012, it processed an average of 1,096 tons per day (Potrero Hills Landfill 2013). The additional 22.4 tons expected from the proposed project and related projects would still be well below that capacity. The Lockwood Landfill processes about 5,000 tons of waste per day (Nevada Division of Environmental Protection n.d.). It is permitted for a capacity of approximately 265 million cubic yards, or between 371 and 530 million tons (Eckert pers. comm.). As of May 2014, it had approximately 268 million cubic yards remaining, or between 375 and 536 million tons (Eckert pers. comm.). Therefore, the additional 22.4 tons per day would not exceed the landfill's capacity. Additionally, these estimates are conservative because they do not include recycling waste that would not be diverted, and it is unlikely that all waste from these projects would go to only one landfill. In summary, solid waste generated from the proposed project, when combined with other anticipated projects, would not result in a cumulative impact.

## **Electricity/Natural Gas and Energy Conservation**

Because energy legislation adopted by California and local governments is intended to conserve statewide and regional energy consumption, projects that conflict with applicable plans and policies would contribute to a cumulative energy impact. Accordingly, for the purposes of this analysis, the proposed project would result in a significant cumulative impact if it conflicts with applicable state or local energy standards; as such, the project-level and cumulative impact determinations are identical. As discussed in Section 3.12, *Public Services and Utilities*, the proposed project would incorporate energy-saving measures required by state and local energy policies, including CalGreen and Title 24, enacted since the 1970s to improve energy efficiency and reduce waste. Policies outlined in the LRVSP would also further reduce energy consumption beyond state recommendations. Therefore, the proposed project would assist the region in meeting energy reduction targets established in statewide legislation. Since the proposed project would not conflict with applicable state or local energy standards, it would not result in a cumulative contribution to a significant cumulative impact.

## **Recreation**

The area examined for purposes of analyzing cumulative impacts on parks and recreational facilities consists of the area within the El Dorado Hills Community Services District (CSD) and Cameron Park CSD. As described in Chapter 3, Section 3.13, *Recreation*, the El Dorado Hills CSD and Cameron Park CSD provide park and recreational facilities and services to residents of the El Dorado Hills and Cameron Park areas, which adjoin the project site.



The *El Dorado County General Plan Draft Environmental Impact Report* (County General Plan EIR) (EDAW 2003) states that projected residential development in conformance with the County General Plan would increase demand for parks and recreational facilities, constituting a significant impact on the deterioration of such facilities. Mitigation included in the County General Plan EIR, and adopted and incorporated into the County General Plan, consists of Policy 9.2.2.2 and Policy 9.2.2.5, which ensure funding mechanisms for the development, operation, and maintenance of park facilities. Implementation of these policies reduces the stated impact to a less-than-significant level and requires, in addition to Quimby Act obligations, that new development funds park and recreational improvements and acquisition of parklands to meet minimum neighborhood, community, and regional park standards.

Buildout of the related projects that comprise the remainder of the cumulative development conditions would add 3,781 housing units to those anticipated under the County General Plan, as well as approximately 40 acres of parkland (Table 5-2). Compliance with County General Plan Policies 9.2.2.2 and 9.2.2.5, as well as Quimby Act requirements as implemented by County Code Section 16.12.090, would be required of these projects; this compliance would ensure that the individual projects meet minimum park standards and result in less-than-significant impacts on the physical deterioration of parks and recreational facilities.

Implementation of the proposed project would result in the construction of up to 800 single-family housing units, increasing the population in an area currently deficient in recreational resources. Implementation of Mitigation Measure REC-1 would remedy the project-specific parkland deficiency. Because the proposed project would introduce additional park users without establishing park acreage and active recreational opportunities that exceed the parkland dedication requirements of the Quimby Act, the County General Plan, and the El Dorado Hills and Cameron Park CSDs, the LRVSP would maintain, but not exacerbate, the existing area-wide parkland deficiency. The proposed project would not make a considerable contribution to the less-than-significant cumulative deterioration of existing park facilities.

Construction of park facilities associated with other, cumulative projects could have significant environmental impacts on such resources as aesthetics, air quality, biology, cultural resources, geology, hazards and hazardous materials, water quality, noise, and transportation. With implementation of Mitigation Measure REC-1, the proposed project would either establish additional, private parkland within the LRVSP or provide in-lieu payments that could be used for new park facilities offsite. The potential construction of 5.2 acres of either onsite private park facilities or offsite park facilities as a result of Mitigation Measure REC-1 could have the significant environmental impacts noted above. However, construction of these park facilities would not constitute a considerable contribution to cumulative physical environmental impacts associated with construction of other park facilities.

## Transportation

Under cumulative conditions, the proposed project could contribute to transportation impacts.

### Vehicle Miles Traveled

Under cumulative conditions in 2040, unincorporated El Dorado County VMT per capita and VMT per employee is forecast at 17.1 per capita for residential land use and VMT 12.0 per employee for commercial office land use (Table 5-5). With the project in isolation, residential VMT is projected to be 21.5 per capita, which exceeds the residential VMT per capita threshold of 14.5. Therefore, the

proposed project would exceed thresholds for residential VMT efficiency under cumulative conditions.

**Table 5-5. Lime Rock Valley Specific Plan’s VMT, Residential Component (Cumulative)**

Scenario	Analysis Geography	VMT	Total Population	VMT per Capita
2040 Baseline	Unincorporated El Dorado County	3,102,953	181,914	17.1
2040 Baseline Plus Project	Project Area	50,585	2,358	21.5
<b>VMT Threshold Exceeded?</b>				<b>Yes</b>

Source: Fehr & Peers 2021.

The proposed project does not include commercial land use, but Mitigation Measure TRA-2 includes adding 22,000 square feet of commercial land use, as well as transportation demand management (TDM) strategies including enhancing bicycle and pedestrian facilities. The implementation of mitigation strategies would reduce VMT per capita, but VMT would still exceed thresholds (Table 5-6).

**Table 5-6. Lime Rock Valley Specific Plan’s VMT with 22,000 Square Feet of Commercial Retail Plus TDM Strategies (Cumulative)**

Scenario	Analysis Geography	VMT	Total Employment	VMT per Employee
2040 Baseline	Unincorporated El Dorado County	3,102,953	181,914	17.1
2040 Baseline Plus Project	Project Area	45,090	2,358	19.1
<b>VMT Threshold Exceeded?</b>				<b>Yes</b>

Source: Fehr & Peers 2021.

The LRVSP is proposed east of the proposed Village of Marble Valley Specific Plan and would rely on VMVSP roadways for access. Therefore, the VMT efficiency of the LRVSP was analyzed with the VMVSP (i.e., with its proposed mitigation to shift 25,000 square feet of commercial offices land use to commercial retail land use). With the VMVSP, the LRVSP VMT per capita would reduce further to 14.5, which would satisfy the 2040 threshold. Therefore, this would not constitute a considerable contribution.

### **Pedestrian and Bicycle Circulation**

Implementation of the proposed project, along with other nearby projects, would increase demand for pedestrian and bicycle facilities. Bicycle network improvements are planned in the study area. Chapter 3, Figure 3.14-4 identifies planned bikeways presented in the El Dorado Bicycle Transportation Plan, 2010 Update and the MTP/SCS for 2035. In addition to these improvements in the area, the proposed project includes a number of additional bicycle and pedestrian facilities, as shown in Chapter 2, Figure 2-7, including a network of gravel trails and unpaved hiking trails connecting the El Dorado Trail to the regional park, and linking with the trail system in and through the neighboring Village of Marble Valley. Additionally, sidewalks may be provided on one or both sides of local residential streets.

The provision of these facilities would support County General Plan Goal TC-4 and policies related to providing safe routes to school (specifically, Policies TC-4a and TC-4i) by providing new bicycle

lanes or multi-use paths or trails along Lime Rock Valley Road and other areas in the project area, which would provide bicycle and/or pedestrian access from residential areas to proposed elementary schools in the Village of Marble Valley to the west of the project area.

These improvements, along with improvements associated with future cumulative conditions, would connect and integrate with existing and planned facilities adjacent to the project area, and would not be anticipated to result in a significant cumulative impact related to conflicts with adopted policies, plans, or programs regarding bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

## Transit

No transit enhancements are proposed as part of the proposed project. However, during the processing of tentative maps for the project area, planning for the installation of infrastructure necessary to accommodate school bus turnouts and public transit would be considered in consultation with the school district and EDCTA.

As described in Section 3.14.1, *Existing Conditions*, demand exceeds capacity at the El Dorado Hills park-and-ride lot and existing capacity available at the Cambridge Road park-and-ride lot would likely be exceeded after accounting for additional development associated with cumulative conditions. Therefore, this would be a significant cumulative impact. About one annual commute trip is generated per El Dorado Hills resident, assuming a population of 46,593 (World Population Review 2021) in El Dorado Hills. Therefore, the proposed project's 800 dwelling units could result in demand for about 2,100 annual commute trips (assuming a household population of 2.6 persons), or about 8 commute trips per weekday. Trips are counted as one-way; therefore, it is estimated that the project would result in the need for four parking stalls dedicated to park-and-ride use. Because the proposed project would be anticipated to increase demand for park-and-ride parking spaces and because demand exceeds capacity at the nearest existing park-and-ride lot, this would result in a considerable contribution to a significant cumulative impact. Implementation of Mitigation Measure CUM-A would reduce the proposed project's contribution to this impact such that it would be less than cumulatively considerable.

### **Mitigation Measure CUM-A: Provide alternative park-and-ride facilities**

If the proposed park-and-ride facility within the nearby Village of Marble Valley area is not completed or does not provide 8 dedicated parking stalls for park-and-ride users prior to the construction of the 400th residential unit (the halfway point of project development), the project applicant will make an in-lieu payment toward the planned Bass Lake Hills Multi-Modal Facility if it is constructed at the time when demand for the lot is created by development of the proposed project.

## Emergency Access

The proposed project would have US 50 access at the Bass Lake Road and Cambridge Road interchanges and two emergency access points at Shingle Lime Mine Road in the north and from Amber Fields Road to the southeast. Additionally, emergency access to and through the project area would be maintained during construction activities associated with the proposed project. However, during construction of infrastructure improvements and development associated with the LRVSP in addition to other nearby projects, an increase in truck traffic on offsite roadways could restrict emergency access in and around the project area. Because these projects could result in inadequate

emergency access, this would be a significant cumulative impact. Implementation of Mitigation Measure TRA-4 would reduce the proposed project's contribution to this impact such that it would be less than cumulatively considerable.

**Mitigation Measure TRA-4: Implement site-specific transportation management plan during construction**

## 5.3 Growth-Inducing Impacts

State CEQA Guidelines Section 21100(b)(5) requires an EIR discuss how a project, if implemented, may induce growth and the impacts of that induced growth (see also State CEQA Guidelines Section 15126). CEQA requires the EIR to discuss specifically “the ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment” (State CEQA Guidelines Section 15126.2[d]). The State CEQA Guidelines do not provide specific criteria for evaluating growth inducement and state that growth in any area is not “necessarily beneficial, detrimental, or of little significance to the environment” (State CEQA Guidelines Section 15126.2[d]). CEQA does not require separate mitigation for growth inducement as it is assumed that these impacts are already captured in the analysis of environmental impacts (see Chapter 3, *Impact Analysis*). Furthermore, State CEQA Guidelines Section 15126.2(d) requires that an EIR “discuss the ways” a project could be growth inducing and to “discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment.”

According to the State CEQA Guidelines, a project would have potential to induce growth if it would result in either of the following.

- Remove obstacles to population growth (e.g., through the expansion of public services into an area that does not currently receive these services), or through the provision of new access to an area, or a change in a restrictive zoning or general plan land use designation.
- Result in economic expansion and population growth through employment opportunities and/or construction of new housing.

In general, a project could be considered growth-inducing if it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth significantly affects the environment in some other way. However, the State CEQA Guidelines do not require a prediction or speculation of where, when, and in what form such growth would occur (State CEQA Guidelines, Section 15145).

### 5.3.1 Remove Obstacles to Growth or Provide New Access

The proposed project includes an amendment of the County General Plan and would connect the project area to existing public services, including sewer and water service, through offsite improvements. It would also construct new roadways and connections to existing roadways to accommodate growth. These infrastructure improvements, combined with the proposed project's County General Plan amendment and rezoning, would remove an existing obstacle to growth at the project site and allow the conversion of more acreage to urban use than is currently allowed. The project area is currently surrounded by rural, low-density residential development and infrastructure and connections to services and facilities would be proportionate to the level

necessary to accommodate the project and, therefore, would not in themselves increase development potential of properties outside the project site that were not planned for development in the project description or the County General Plan. Therefore, this impact is considered less than significant, and no mitigation is required.

### 5.3.2 Economic, Population, and Housing Growth

The proposed project would directly affect the population and housing growth in the area by increasing the number of housing units in the area by 800, representing an additional 2,072 people. The existing adopted plans designate the project area as open space and low-density residential (5-acre lots). Current entitlements and land use designations for the project site would allow development of up to 56 residential units that would house an estimated population of 145. The proposed project would amend the County General Plan. The County's population is anticipated to increase by over 20,000 between the years 2010 and 2020, and by over 50,000 between 2010 and 2030; these projections indicate a trend of continuing growth within unincorporated El Dorado County. The additional housing units and population associated with the proposed project would directly contribute to population growth in the County.

## 5.4 Significant and Unavoidable Impacts

State CEQA Guidelines Section 21067 and Sections 15126(b) and 15126.2(b) 15126.2 (b) require that an EIR describe any significant impacts, including those that can be mitigated but not reduced to a less-than-significant level. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should also be described.

A significant and unavoidable impact is one that would cause a substantial adverse effect on the environment and for which no mitigation is available to reduce the impact to a less-than-significant level. Most of the impacts of the LRVSP would be less than significant or would be mitigated to a less-than-significant level. The impacts below are those that would remain significant and unavoidable after mitigation.

### Aesthetics

- Impact AES-1: Temporary visual impacts caused by construction activities
- Impact AES-4: Substantially degrade the existing visual character or quality of the site and its surroundings
- Impact AES-5: Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area

### Air Quality

- Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan
- Impact AQ-3a: Expose sensitive receptors to substantial toxic air contaminant concentrations and health risks during construction

### **Greenhouse Gas Emissions**

- Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
- Impact GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases

### **Noise and Vibration**

- Impact NOI-1a: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance as a result of construction activities
- Impact NOI-1b: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance from project-generated traffic within the LRVSP in excess of standards established in the County General Plan
- Impact NOI-4: Result in noise impacts due to activities associated with project offsite improvements

### **Population and Housing**

- Impact POP-1: Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)

### **Transportation and Circulation**

- Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)

In addition to the significant and unavoidable direct impacts listed above, the project also would result in considerable contributions to significant and unavoidable cumulative impacts in the following resource areas, as described in Section 5.2.2, Analysis of Potential Cumulative Impacts.

- Aesthetics
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions

## **5.5 Significant Irreversible Environmental Changes**

State CEQA Guidelines Section 15126.2 (c) requires that an EIR address any significant irreversible changes that would result from a proposed project and provides the following direction for the discussion of irreversible changes.

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar

uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to ensure that current consumption is justified.

The State CEQA Guidelines describe three distinct categories of significant irreversible changes, including changes in land use that would commit future generations to specific uses; irreversible changes from environmental actions; and consumption of nonrenewable resources.

The construction of residential development and associated amenities would result in the development of undeveloped land, which is a long-term commitment. Though nearly half of the project area would remain in open space, 360 acres of currently undeveloped land would be developed in low- and medium-density residential uses, another 8 acres in village parks, and 39 acres in roads and landscaped lots. Therefore, a total of 407 acres of previously undeveloped land would be developed. Due to the large commitment of capital and infrastructure necessary for site development, it is improbable that the site, once developed, would revert to its current, primarily undeveloped, open space use in the future.

Irreversible environmental changes would result from the actions associated with the conversion of a largely undeveloped site to suburban uses. Implementation of the proposed project would include construction of structures, roads, and other infrastructure, which would be composed of a variety of nonrenewable (metal, gravel, concrete), or slowly renewable resources (wood) and would be fueled using primarily non-renewable fossil fuel sources. In addition, consumption of resources would continue in association with the land uses allowed under the LRVSP. Residential and public uses would use energy and public utilities. However, the Sustainability Element of the LRVSP outlines, and requires the execution of, a number of sustainable development strategies. These strategies include recycling and reuse of construction materials, exceeding energy efficiency standards for building, encouraging alternate means of transportation through design, and incorporating energy and water conservation techniques. Implementation of these strategies would minimize the proposed project's consumption of nonrenewable resources.

## 5.6 Mitigation Measures with the Potential for Environmental Effects under CEQA

State CEQA Guidelines Section 15126.4(a)(1)(D) provides that, “[i]f a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but, in less detail, than the significant effects of the project as proposed.” For each impact considered significant in this EIR, mitigation measures have been designed that would reduce the severity of the impact. However, some of these mitigation measures could have the potential themselves to result in significant impacts. In general, these measures require construction activities and/or ground disturbance. The following sections provide an impact analysis of those commitments and mitigation measures.

## 5.6.1 Transportation Mitigation Measures

### **Mitigation Measure TRA-2: TDM strategies to reduce the impact of the residential component**

Under this measure, the Applicant shall be required to increase the diversity of land use by adding 22,000 SF of commercial/retail to the LRVSP; provide a connected pedestrian/bicycle network within the development; and provide end-of-trip bicycle facilities (i.e., secure bicycle parking and public repair stations) at the commercial retail component of the project.

### **Mitigation Measure TRA-4: Implement site-specific transportation management plan during construction**

Under this measure, the Applicant shall prepare for County review and approval a site-specific construction Transportation Management Plan (TMP) that addresses the specific steps to be taken before, during, and after construction to minimize traffic impacts. The applicant shall ensure this is implemented prior the beginning of construction at a site.

### **Mitigation Measure CUM-A: Provide alternative park-and-ride facilities**

Under this measure, it may be necessary to provide for or contribute to the provision of 8 additional parking stalls at an existing park-and-ride facility.

## Potential Environmental Effects of Transportation Mitigation Measures

Activities associated with these mitigation measures, such as grading or installing new or reconstructed surface treatments, could cause environmental effects through ground disturbance, noise, air emissions, and traffic disruptions. Ground disturbances would result from activities such as grading and reconstruction. These improvements would be located along existing roadways and would likely be within existing rights-of-way; therefore, they would not be anticipated to require substantial disturbances. These ground-disturbing activities, depending on their location and magnitude, could adversely affect species habitats both in the short and long terms. Disturbances would be minimized by implementing Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-1d, BIO-1e, BIO-2, BIO-3a, BIO-3b, and BIO-4, BIO-7, BIO-11a, BIO-11b, BIO-12, and BIO-17.

Increased noise would result from grading and reconstruction, which would have the potential to expose sensitive receptors and noise-sensitive land uses to excessive noise. However, construction-related noise impacts would be minimized and reduced through implementation of Mitigation Measure NOI-1a and by adopting practices to reduce effects on noise-sensitive land uses.

Increased criteria pollutants and GHGs would result from the operation of excavation equipment, at the proposed park-and-ride facility, as well as from use of trucks hauling materials. Mitigation Measures AQ-2b, AQ-2c, AQ-2d, and GHG-1 would be available to address emissions associated with implementing these improvements.

Traffic may also be disrupted as a result of the proposed park-and-ride facility. As described in Impact TRA-4 in Chapter 3, Section 3.14, *Transportation and Circulation*, Mitigation Measures TRA-1e, and TRA-4 would be available to reduce the severity of this impact. Overall, impacts associated with implementation of these mitigation measures would be less than significant.



The addition of 22,000 square feet of commercial/retail to increase the diversity of land use in the project would reduce VMT, resulting in a commensurate reduction in operational GHG and criteria pollutant emissions from mobile sources. Traffic volumes may decrease during the A.M. peak hour and the P.M. peak hour may experience an increase of up to 45 vehicles. The largest increase would occur at the project site. Intersections further from the project site would experience less increase. However, the increase in peak hour trip generation would not result in congested conditions and consequently, would not result in a new (or more severe) localized carbon monoxide impact.

## 5.7 Potential Indirect Effects Associated with Secondary Dwelling Units

### 5.7.1 Background

The LRVSP Land Use Diagram identifies five land use designations that are consistent with the County General Plan. Three residential designations that provide for 800 units (low and medium density single-family residential) accommodate a variety of housing types and both residential designations establish an average density. The residential component of the LRVSP includes two land use designations to achieve the vision of housing diversity. The LRVSP supports the development of small and large conventional-style detached units, and detached product types to appeal to the aging population and changing demographics. Of the two residential land use designations, the Lime Rock Residential - Low (LRL) land use designation creates neighborhoods composed of individually owned, single-family detached homes. Under the LRVSP, up to 550 dwelling units could be constructed in this designation. The LRL designation allows one single-family dwelling and one secondary dwelling unit per legal lot. The LRVSP does not propose secondary dwelling units nor is the project applicant requesting entitlements for secondary units.

General Plan Housing Element Policy HO-1.24 encourages second dwelling units to provide housing that is affordable to very low-, low- and moderate-income households. The current Housing Element (2021–2029) has established, among other objectives to meet regional housing needs, a goal of 584 second dwelling units (Housing Element Measure HO-9). County Code of Ordinances Chapter 130.31, Affordable Housing Density Bonus, further establishes specific requirements to implement Housing Element provisions. Section 130.40.300, Secondary Dwellings, states that the County implements California Government Code Section 65852.150 et seq. regarding secondary dwellings. If the LRVSP is approved, it is, therefore, reasonably foreseeable that secondary dwelling units would likely be constructed within the LRVSP. There is no County requirement, however, that the income level restrictions be applied to the secondary dwelling units.

The County Code of Ordinances Section 130.24.030 sets forth the development standards for secondary dwelling units on a lot with a single-family dwelling. These standards identify maximum floor areas for secondary dwellings relative to the size of the primary dwelling, setbacks, height limits, lot coverage, and other requirements of the zone in which it is located. The secondary dwelling may be attached to the primary dwelling or detached. Typically, the secondary dwelling units range from a studio to one or two bedrooms (much like an apartment).

## 5.7.2 Secondary Dwelling Unit Development Potential in LRVSP

Not all of the 550 lots within the LRL designation in the LRVSP would have a secondary dwelling unit. Secondary dwelling units would only be permitted on certain size lots, and the amount of land remaining to develop a secondary dwelling unit would depend on the primary house size. This information is not available at this stage of the planning process. However, the historical number of secondary dwelling permits issued by the County relative to all single-family building permits issued, is an indicator of the potential number of units. During 2008–2014, the County issued 70 secondary dwelling unit permits countywide. Compared to the total number of single-family residential permits countywide during the same time period (1,411), the number of secondary dwelling units represents approximately 5 percent of residential permits on a countywide basis.

The LRVSP proposes a total of 550 units within the LRL land use designation. Based on an assumption that 5 percent could have secondary dwelling units on the same lot, this would be approximately 28 units.

## 5.7.3 Regulatory Considerations Pertaining to CEQA Review

California State law (Government Code Section 65852.150) requires local agencies to provide a ministerial approval option for secondary dwelling units. Through its adoption of Section 130.40.300 of the County Code of Ordinances, the County has established that secondary dwelling units may be approved as a ministerial action. Section 130.40.300.B of the code states that in all zones that permit single-family residential development, the construction of a new structure for the purpose of creating a secondary dwelling is allowed by right in most situations. That is, the issuance of a building permit for a secondary dwelling is a ministerial, not discretionary action. Public Resources Code Section 21080 and State CEQA Guidelines Section 15268(a) establishes that ministerial projects are exempt from the requirements of CEQA.

As noted above, the project applicant is not requesting any entitlements for secondary dwelling units. However, it is reasonably foreseeable that secondary dwelling units could be constructed within the LRVSP because it provides a land use designation that would allow such use. Consequently, this is considered an indirect (or secondary) effect of the proposed project, which does require evaluation under CEQA (State CEQA Guidelines 15126.2(a)).

## 5.7.4 Potential Environmental Effects of Construction and Occupancy of Secondary Dwelling Units

Secondary dwelling units may only be constructed on single-family residential lots in the LRL designation. Potential impacts that are associated with ground disturbance such as biological resources, cultural resources, geology/soils, construction site runoff, and hazardous materials use in equipment would be as described for the proposed project. If a proposed unit were to result in the need for oak tree or oak woodland removal, it would be subject to General Plan Policy 7.4.4.4 Option A requirements, which are described in Impact BIO-1 in Chapter 3, Section 3.3, *Biological Resources*. The construction of secondary dwelling units would not result in new impacts or increase the severity of the impacts identified for the proposed project. If a secondary dwelling unit were to involve more than 250 cubic yards of soil disturbance, a grading permit would be required (also a

ministerial action). The design of the unit must also comply with the County’s post-construction stormwater runoff requirements to reduce urban pollutants in stormwater runoff.

Construction equipment would be a source of criteria pollutants and GHGs. Only a few pieces of equipment would be needed to construct a second unit, and minimal emissions would be generated. Secondary dwelling units would not all be constructed at once. Historically in the County, the frequency that secondary dwelling units are constructed is limited to a few units per year, at most. Nevertheless, for the purposes of analysis, criteria pollutant and GHG emissions were estimated assuming all 28 units would be constructed at the same time during the first two years of LRVSP construction, followed immediately by full occupancy. Because actual construction and operation would occur over several decades, the emissions analysis represents a worst-case assessment of potential air quality impacts.

The results of the emissions modeling are summarized in Tables 5-7 through 5-10. The analysis accounts for emissions benefits achieved from mandatory LRVSP policies, as discussed in Chapter 3, Sections 3.2, *Air Quality*, and 3.6, *Greenhouse Gas Emissions*. CalEEMod defaults were assumed for construction and operational inputs, with the exception of the following.

- Each unit would be a maximum of 800 square feet (pursuant to LRVSP, the secondary units cannot exceed 30 percent of the square footage of the primary dwelling).
- The secondary dwelling units would result in a demand for approximately 5.0 AFY of potable water (discussed further below).

**Table 5-7. Estimated Maximum Criteria Pollutant Emissions from Construction of Secondary Units (pounds per day) <sup>a</sup>**

Year	ROG	NO <sub>x</sub>	CO	PM10			PM2.5		
				Dust	Exhaust	Total	Dust	Exhaust	Total
Year 1	3	10	14	20	1	21	10	1	11
Year 2	35	7	11	<1	<1	<1	<1	<1	<1
Threshold	82	82	-	BMPs	-	-	BMPs	-	-

Source: Ascent 2024.

<sup>a</sup> Modeling does not account for implementation of Mitigation Measures AQ-2a through AQ-2d, as discussed in Chapter 3, Section 3.2, *Air Quality*. Accordingly, the results are conservative and actual emissions would be less than presented in this table.

BMPs = best management practices.

**Table 5-8. Estimated GHG Emissions from Construction of Secondary Units (metric tons per year) <sup>a</sup>**

Year	CO <sub>2</sub> e
Year 1	325
Year 2	16

Source: Ascent 2024.

<sup>a</sup> Modeling does not account for implementation of Mitigation Measure GHG-1, as discussed in Section 3.6, *Greenhouse Gases*. Accordingly, the results are conservative and actual emissions would be less than presented in this table.

CO<sub>2</sub> = carbon dioxide.

CH<sub>4</sub> = methane.

N<sub>2</sub>O = nitrous oxide.

CO<sub>2</sub>e = carbon dioxide equivalent.

**Table 5-9. Estimated Criteria Pollutant Emissions from Operation of Secondary Units (pounds per day) <sup>a</sup>**

Location	ROG	NO <sub>x</sub>	CO	PM10	PM2.5
Area sources	2	1	8	1	1
Energy sources	<1	<1	<1	<1	<1
Mobile sources	1	1	5	1	<1
Total combined emissions	3	1	13	2	1
EDCAQMD threshold	82	82	CAAQS	CAAQS	CAAQS

Source: Ascent 2024.

<sup>a</sup> Emissions account for reductions achieved by LRVSP Policies 7.45 and 7.46. Modeling does not account for implementation of Mitigation Measure GHG-2, as discussed in Section 3.6, *Greenhouse Gases*. Accordingly, the results are conservative and actual emissions would be less than presented in this table.

ROG = reactive organic gas.

NO<sub>x</sub> = nitrous oxide.

CO = carbon monoxide.

PM10 = CAAQS for coarse particulate matter.

PM2.5 = NAAQS for fine particulate matter.

CAAQS = California Ambient Air Quality Standards.

**Table 5-10. Estimated Greenhouse Gas Emissions from Operation of Secondary Units (metric tons per year) <sup>a</sup>**

Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	HFC	CO <sub>2</sub> e
Area sources	26	<1	<1	-	26
Energy use	52	<1	<1	-	52
Mobile	165	<1	<1	<1	168
Waste generation	2	<1	<1	-	5
Water consumption	1	<1	<1	-	2
Refrigerants	-	-	-	<1	<1
Total combined emissions	244	<1	<1	<1	254

Source: Ascent 2024.

CO<sub>2</sub> = carbon dioxide.

CH<sub>4</sub> = methane.

CO<sub>2</sub>e = carbon dioxide equivalents.

GHG = greenhouse gas.

N<sub>2</sub>O = nitrous oxide.

<sup>a</sup> Values may not add due to rounding. Modeling includes emissions benefits achieved by mandatory LRVSP Policies 7.15, 7.33, 7.37, 7.38, 7.42, 7.45, and 7.46. State regulations designed to reduce GHG emissions (Pavley standards, LCFS, and RPS) are also included in the emissions modeling. Modeling does not account for implementation of Mitigation Measure GHG-2, as discussed in Section 3.6, *Greenhouse Gases*. Accordingly, the results are conservative and actual emissions would be less than presented in this table.

As shown in Tables 5-7 and 5-8, construction of the secondary units would not individually exceed EDCAQMD thresholds. Implementation of Mitigation Measures AQ-2a through AQ-2d and GHG-1 would further reduce construction-related emissions. However, if secondary dwellings were constructed or operated at the same time as part of the proposed project, the emissions may result in a significant contribution to overall emissions of a particular construction year (see Section 3.2, *Air Quality*, Table 3.2-6 and Section 3.6, *Greenhouse Gas Emissions*, Table 3.6-4). Noise from construction equipment would be periodic and limited to a few pieces of equipment. An individual

homeowner constructing a secondary dwelling unit would be required to comply with the County's requirements pertaining to hours of operation (Section 3.10, *Noise*, Table 3.10-7).

In addition to meeting the County's development standards pertaining to height, size, and setbacks (Section 130.40.300(C)), secondary dwelling units constructed in the LRVSP would also be subject to the LRVSP Homeowners' Association design review process, which would address aesthetics impacts. The provision of necessary ingress/access, setbacks, and defensible space would also be reviewed by the County as part of the building permit approval process to ensure fire safety, particularly if a unit were to be constructed near open space. Applicable fire safety fees would be required prior to building permit issuance. Other restrictions may be established by the developer for specific lots.

Secondary dwelling units would consume energy and generate vehicle trips and VMT. Assuming a CalEEMod default trip rate, the 28 units would generate a maximum of 260 daily trips (Saturday). When added to the trips generated by the entire LRVSP project, this would not be enough additional trips, or VMT, to result in any new or more severe impacts because the incremental increase would represent approximately 3.3 percent of all trips. VMT efficiency, measured in VMT per capita would not change because secondary dwellings would be in the same location. At the time of preparation of this Draft EIR, an applicant for a building permit for a secondary dwelling unit would be required to pay the applicable multi-family TIF fee in effect at the time of building permit issuance. However, the 2016 update to the TIF fee program included an off-set program for secondary dwelling units. The CIP and TIF Fee Program Final EIR was certified on December 6, 2016, and the accompanying TIF fees went into effect on February 13, 2017, as amended in 2018 and 2019. An Addendum to the EIR was certified on June 26, 2018, and the fees were updated in 2019 and 2020. A major update to the TIF Fee Program was adopted on December 8, 2020, which renamed the program to the Traffic Impact Fee or TIF Program and went into effect on February 8, 2021.

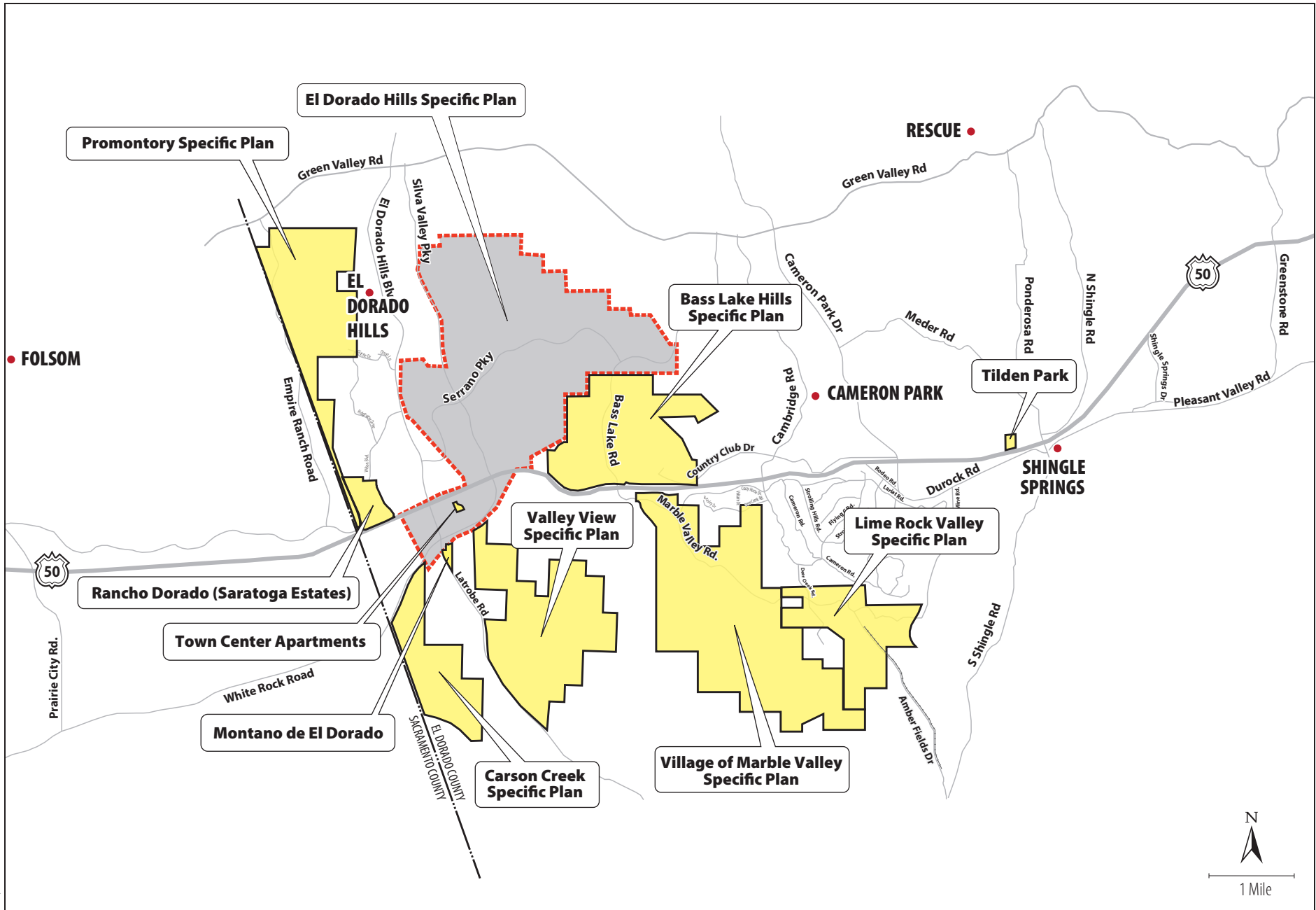
The additional trips and energy consumption would generate criteria pollutant and GHG emissions. As shown in Tables 5-9 and 5-10, operation of the 28 secondary units would not generate criteria pollutants in excess of EDCAQMD thresholds. However, these emissions would be additive with the proposed project's emissions. This Draft EIR has estimated LRVSP air pollutant emissions and has determined they would be less than significant with mitigation. Emissions from secondary dwelling units would contribute to this impact. Mitigation Measures AQ-2e and GHG-2 through GHG-5 would be required to reduce criteria pollutant emissions. While minor, GHG emissions from the secondary units would contribute to the larger LRVSP impact before mitigation. Mitigation Measures GHG-1 through GHG-8 would be required to reduce and offset emissions, as applicable.

Secondary dwelling units would also create a demand for potable water. For a second unit, water demand would be almost entirely indoor demand. As stated in the WSA prepared for the LRVSP (Appendix H, *Water Supply Assessment:2-4*), based on EID meter data for the past several years, the annual indoor water use for a typical single-family residence is approximately 0.18 af/du. The value is less for apartments (or in this case a secondary dwelling unit) as a result of less people living in each unit. The WSA does not state a specific indoor demand for apartments. The approximately 28 secondary dwelling units conservatively would result in a demand for approximately 5.0 AFY of potable water. When added to the LRVSP's water demand (573 AFY), the incremental additional demand (less than 0.8 percent) would have minimal effect on the overall water supply availability for the proposed project, which the WSA has determined is sufficient. The secondary dwelling units would also generate wastewater. Because nearly all of the demand for water would be for indoor use, then a similar amount of wastewater would be generated on a per unit basis (approximately

160 gallons per day, or 0.00016 mgd). On an individual unit basis this would have no measurable effect on Deer Creek Wastewater Treatment Plant capacity. When the additional units are combined with LRVSP project flows (0.12 mgd), the total would only increase to 0.13 mgd. These flows when combined with existing flows treated the plant would still be within the 3.6-mgd plant capacity (see Impact PSU-3 in Section 3.12, *Public Services and Utilities*). Prior to issuance of a building permit, applicants for secondary dwelling units would be required to provide proof of service from EID and pay appropriate EID connection fees.

Occupancy of secondary dwelling units would be expected to result in school-age children who would attend local schools. The County requires payment of school impact fees at the time of issuance of a building permit.

In summary, the construction and occupancy of secondary dwelling units would result in indirect environmental effects that would contribute to the impacts identified in this Draft EIR. However, the contribution would be minimal relative to the proposed project's impacts and would not result in new significant impacts or result in a substantial increase in the severity of an identified impact.



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**Figure 5-1**  
**Locations of Cumulative Projects**

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