
5. STATUTORILY REQUIRED SECTIONS

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5.1 INTRODUCTION

The Statutorily Required Sections chapter of the Draft EIR includes discussions regarding those topics that are required to be included in an EIR, pursuant to CEQA Guidelines, Section 15126.2. The chapter includes a discussion of the proposed project's potential to result in growth-inducing impacts; the cumulative setting analyzed in this EIR; significant irreversible environmental changes; and significant and unavoidable impacts caused by the proposed project.

5.2 GROWTH-INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires an EIR to evaluate the potential growth-inducing impacts of a proposed project. Specifically, an EIR must discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or by encouraging and/or facilitating other activities that could induce growth. Examples of projects likely to have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions or office complexes in areas that are currently only sparsely developed or are undeveloped.

The CEQA Guidelines are clear that while an analysis of growth-inducing effects is required, it should not be assumed that induced growth is necessarily significant or adverse. This analysis examines the following potential growth-inducing impacts related to implementation of the proposed project and assesses whether these effects are significant and adverse (see CEQA Guidelines, Section 15126.2[d]):

1. Foster population and economic growth and construction of housing.
2. Eliminate obstacles to population growth.
3. Affect service levels, facility capacity, or infrastructure demand.
4. Encourage or facilitate other activities that could significantly affect the environment.

Foster Population and Economic Growth and Construction of Housing

As discussed in Chapter 4.8, Land Use and Planning/Population and Housing, of this EIR, using a 2.45 persons per household average size for El Dorado County, residential development associated with the Project Development Area is anticipated to house an estimated 274 residents. Development of the Project Development Area and the associated addition of 274 residents would increase the total current population of the BVLHSP area from 1,947 to 2,221, or a 14.1 percent increase. In addition, when considering buildout of the Program Study Area, full Project Buildout could result in a total population increase of approximately 1,807 residents. Development of the proposed project and the associated addition of an estimated 1,807 residents would increase the total current population of the BLHSP area from 1,947 to 3,754, or a 92.8 percent increase. However, the BLHSP projected that the area's population could grow by as many as 4,811 residents by buildout. Therefore, although the proposed project would have the potential to increase the population of the area, such an increase in population is planned and would be within



the range of growth projections assumed in the 2030 El Dorado County General Plan as well as for the BLHSP area. Furthermore, the infrastructure included in the proposed project would serve only the project.

While construction of the proposed project would result in increased construction employment opportunities, which could potentially result in increased permanent population and demand for housing in the vicinity of the project site, employment patterns of construction workers is such that construction workers would not likely, to any significant degree, relocate their households as a result of the construction-related employment opportunities associated with the proposed project. In addition, although the proposed project would include the development of commercial uses, which were not anticipated for the site in the 2030 General Plan, and could provide additional long-term employment opportunities, such opportunities would not be anticipated to result in a substantial increase in permanent population or demand for housing in the vicinity of the project site. The proposed project included development of 56 residential dwelling units reserved for on-site employee housing. In addition, the employment opportunities would likely be filled from the local employee base. As a result, the on-site employment opportunities would not be anticipated to result in a substantial increase in the permanent population or demand for housing in the project vicinity.

Appendix G of CEQA Guidelines has been recently amended to clarify that unplanned population growth would be considered a potentially significant impact. However, growth that is planned, and the environmental effects of which have been analyzed in connection with a land use plan or a regional plan, should not by itself be considered an impact. Consequently, as discussed in further detail under Impacts 4.8-3 and 4.8-5 within the Land Use and Planning/Population and Housing chapter of this EIR, the proposed project would result in population growth within El Dorado County, but such growth would be within the buildout projections for unincorporated areas within El Dorado County. Thus, while the project would foster population and economic growth, such growth would be similar to what has been previously anticipated for the project region as well as the project site, and a less-than-significant impact related to population and economic growth would occur.

Eliminate Obstacles to Population Growth

The elimination of either physical or regulatory obstacles to growth is considered to be a growth-inducing effect. A physical obstacle to growth typically involves the lack of public service infrastructure. The extension of public service infrastructure, including roadways, water mains, and sewer lines, into areas that are not currently provided with these services, would be expected to support new development. Similarly, the elimination or change to a regulatory obstacle, including existing growth and development policies, could result in new growth.

As discussed in Chapter 4.13, Utilities and Service Systems, of this EIR, the project site is not currently served by a water service provider, and would require annexation into the El Dorado Irrigation District (EID) service area to accommodate the proposed project. The nearest existing water line is a 24-inch water main located in Bass Lake Road, approximately 2,000 feet north of the project site. As such, the proposed project would require an off-site water line extension or order to provide water to the project site. The proposed off-site water line extension would either include approximately 3,900 linear feet of new 12-inch water line, which would connect to the existing 24-inch line and extend south within Bass Lake Road to the project site, or would be installed within the alignment of the approved Bass Lake North Bike Trail that is planned to extend



along the east side of Bass Lake Road from Hollow Oaks Drive to Old Country Club Drive for approximately 1,600 linear feet.

In addition, two alternatives are currently proposed for providing sewer service to the project site. The first alternative consists of the construction of an approximately 10,510-linear-foot BLHSP sewer main connecting the project site to the existing 18-inch South Uplands Trunk Sewer-Gravity Main located in Russi Ranch Road, approximately 1.6 miles to the west. In order to receive public sewer service from EID, the project site would need to be annexed into the EID service area. The second alternative includes a septic sewer system as an interim solution for the Project Development Area of the project site. It is anticipated that the Project Development Area would initially include development of the proposed on-site septic system. Connection of the proposed project to the public sewer system is anticipated to occur at such time future development within the Program Study Area commences.

All potential physical environmental impacts that could result from development of the proposed project, including new utility infrastructure, have been evaluated throughout the technical chapters of this EIR. The on- and off-site water and sewer system improvements would be sized to serve only the proposed project and would be financed by the project applicant.

While the proposed project would also include development of an internal roadway system, which would connect to Bass Lake Road to the west and to Country Club Drive to the north, the proposed roadway improvements would improve connectivity to the project site, serving residents, visitors, and employees of the proposed project, and would not be anticipated to eliminate obstacles to population growth.

The aforementioned improvements are essential to support the proposed project and would not eliminate obstacles to growth in a manner that would encourage previously unplanned growth.

Affect Service Levels, Facility Capacity, or Infrastructure Demand

Increases in population that would occur as a result of a proposed project may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental impacts. As discussed in Chapter 4.10, Public Services and Recreation, of this EIR, increased demands for public services, including fire and police protection services, attributable to the proposed project would not necessitate the construction of new or expanded facilities that could cause significant environmental impacts. The proposed project would be required to comply with all General Plan and BLHSP policies and pay applicable fees that support emergency police and fire services. In addition, the project would be required to pay applicable fees to the Buckeye Union School District (BUSD) and El Dorado Union High School District (EDUGSD).

As discussed in Chapter 4.13, Utilities and Service Systems, of this EIR, the County confirmed that the EDH WWTP has adequate capacity to accommodate the full sewer generation from the proposed project, including both the Project Development Area and Program Study Area. In addition, EID is projected to maintain a supply which exceeds its projected demands by greater than 11,000 acre-feet (AF) in normal water years, single dry water years, and multi-year droughts from 2025 through 2045. Therefore, even if the proposed project's 207 acre-feet per year (AFY) of water demand was not included in EID's future demand growth anticipated by the 2020 Urban Water Management Plan (UWMP), EID would still have sufficient water supplies to serve the proposed project. While the proposed project would require an off-site water line connection and



is anticipated to include an off-site sewer connection either during construction of the Project Development Area or during future development of the Program Study Area, the proposed infrastructure improvements are essential to support the proposed project, would be sized to serve only the proposed project, and would be financed by the project applicant. All potential physical environmental impacts that could result from development of the proposed project, including new utility infrastructure, have been evaluated throughout the technical chapters of this EIR.

The landfill that would serve the proposed project has adequate capacity to manage the solid waste generated as a result of the project. Furthermore, mitigation measures set forth in Chapter 4.7, Hydrology and Water Quality, of this EIR would ensure that the proposed project would not create or contribute runoff water that would exceed the capacity of the County's stormwater drainage systems. Therefore, the proposed project would not increase population such that service levels, facility capacity, or infrastructure demand would require construction of new facilities that could cause significant environmental impacts.

Encourage or Facilitate other Activities That Could Significantly Affect the Environment

This EIR provides a comprehensive assessment of the potential for environmental impact associated with implementation of the proposed project. Please refer to Chapters 4.1 through 4.15 of this EIR, which comprehensively address the potential for impacts from development of the proposed project.

5.3 CUMULATIVE IMPACTS

CEQA Guidelines, Section 15130 requires that an EIR discuss the cumulative and long-term effects of the proposed project that would adversely affect the environment. "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines, Section 15355). "[I]ndividual effects may be changes resulting from a single project or a number of separate projects" (CEQA Guidelines, Section 15355, subd. [a]). "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (CEQA Guidelines, Section 15355, subd. [b]).

The need for cumulative impact assessment reflects the fact that, although a project may cause an "individually limited" or "individually minor" incremental impact that, by itself, is not significant, the increment may be "cumulatively considerable," and, thus, significant, when viewed together with environmental changes anticipated from past, present, and probable future projects (CEQA Guidelines, Section 15064, subd. [h(1)], Section 15065, subd. [c], and Section 15355, subd. [b]). Accordingly, particular impacts may be less than significant on a project-specific basis but significant on a cumulative basis if their small incremental contribution, viewed against the larger backdrop, is cumulatively considerable. However, it should be noted that CEQA Guidelines, Section 15064, subdivision (h)(5) states, "[...]the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable." Therefore, even where cumulative impacts are significant, any level of incremental contribution is not necessarily deemed cumulatively considerable.



Section 15130(b) of CEQA Guidelines indicates that the level of detail of the cumulative analysis need not be as great as for the project impact analyses, but that analysis should reflect the severity of the impacts and their likelihood of occurrence, and that the analysis should be focused, practical, and reasonable. To be adequate, a discussion of cumulative effects must include the following elements:

- (1) Either (a) a list of past, present and probable future projects, including, if necessary, those outside the agency's control, or (b) a summary of projections contained in an adopted general plan or related planning document, or in a prior certified EIR, which described or evaluated regional or area-wide conditions contributing to the cumulative impact, provide that such documents are reference and made available for public inspection at a specified location;
- (2) A summary of the individual projects' environmental effects, with specific reference to additional information and stating where such information is available; and
- (3) A reasonable analysis of all of the relevant projects' cumulative impacts, with an examination of reasonable, feasible options for mitigating or avoiding the project's contribution to such effects (Section 15130[b]).

For some projects, the only feasible mitigation measures will involve the adoption of ordinances or regulations, rather than the imposition of conditions on a project-by-project basis (Section 15130[c]). Section 15130(a)(3) states that an EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable, and thus not significant, if a project is required to implement or fund the project's fair share of a mitigation measure or measures designed to alleviate the cumulative impact.

A discussion of cumulative impacts is provided within each of the technical chapters of this EIR pursuant to CEQA Guidelines Section 15130.

Cumulative Setting

The lead agency should define the relevant geographic area of inquiry for each impact category (id., Section 15130, subd. [b][3]), and should then identify the universe of "past, present, and probable future projects producing related or cumulative impacts" relevant to the various categories, either through the preparation of a "list" of such projects or through the use of "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact" (id., subd. [b][1]).

The majority of the cumulative analysis in this EIR is based upon a summary of projections contained in the 2004 El Dorado County General Plan, as well as other reasonably foreseeable projects within the project region that require an amendment to the General Plan, and, thus, are not included in its summary of projections. Local General Plan Amendment projects within El Dorado County for which a formal application has been submitted include, but are not limited to, the following projects:

- **Lime Rock Valley Specific Plan** - The Lime Rock Valley Specific Plan would develop an approximately 740-acre residential community at Deer Creek Road, including 800 residential units, a 15-acre neighborhood park with recreational amenities, and approximately 314 acres of public and private open space.



- **Village of Marble Valley Specific Plan** - The Village of Marble Valley Specific Plan is located on a 2,341-acre property, south of U.S. Highway 50 (US 50) between Bass Lake Road and Cambridge Road. The project would include approximately 3,236 dwelling units, and 475,000 square feet (sf) of commercial uses. Full buildout of the Village of Marble Valley Specific Plan would also include public facilities, such as a Village Center, two public schools, vineyards, a wine and agricultural center, and various open space uses (including a historic park, public and private parks, and trails).
- **EDH52** - The EDH 52 Project is located at the northeast corner of Silva Valley Road and US 50. The project would include the Silva Valley Parkway interchange and road realignment, as well as development of approximately 350,000 sf of commercial uses, including a hotel, drive-thru, gas station, grocery, and pharmacy, as well as various retail and restaurant uses.
- **Bass Lake Regional Park Project** - The Bass Lake Regional Park Project would develop passive and active recreational opportunities, including a dog park, volleyball courts, sport fields, multi-use trails, a fishing dock, and a boat ramp within a 200-acre regional park. The Bass Lake Regional Park Project would also include development of a 2,500-sf museum, educational facility, and outdoor amphitheater.
- **Generations at Green Valley** - The Generations at Green Valley project, located south of Green Valley Road, would include the subdivision of a 280.7-acre parcel into 379 single-family residential lots, a park and nine open space lots, and a clubhouse. Of the 379 proposed units, 214 would be age restricted high density single-family units for residents 55 years or older. The remaining 165 units would include 147 high density non-age restricted single-family units, and 18 residential estate, five-acre (RE-5) lots. The 18 RE-5 zoned lots would be located generally along the northern, eastern, and southern perimeter of the site as well as along Green Valley Road.
- **Cameron Meadows** - The Cameron Meadows Project is located on 104 acres east of the Cameron Park Airport between the Cameron Woods and Cameron Valley subdivisions and would include development of 161 single-family residences, as well as 16 attached accessory dwelling units (ADUs) that would be deed-restricted at a rate affordable to low-income households. The project would preserve approximately 62.64 acres of the site as open space.

Limited situations exist where geographic setting differs between project chapter analysis within a particular region. For example, the cumulative geographic setting for hydrology is the Carson Creek Watershed, in which the project site is located. In addition, the cumulative geographic setting for air quality is the Mountain Counties Air Basin (MCAB). Global climate change is, by nature, a cumulative impact. Greenhouse gas (GHG) emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change (e.g., sea level rise, impacts to water supply and water quality, public health impacts, impacts to ecosystems, impacts to agriculture, and other environmental impacts). A single project could not generate enough GHG emissions to contribute noticeably to a change in the global average temperature. However, the combination of GHG emissions from a project in combination with other past, present, and future projects could contribute substantially to the world-wide phenomenon of global climate change and the associated environmental impacts. Although the geographical context for global climate change is the Earth, for analysis purposes under CEQA, and due to the regulatory context pertaining to GHG emissions and global climate change applicable to the proposed project, the geographical context for global climate change in this EIR is limited to the State of California.



Table 1 below provides a summary of the geographic scope for the cumulative analysis of each environmental resource topic analyzed within this EIR.

Table 1 Geographic Scope	
Resource Topic	Geographic Area
Aesthetics	Project site, in combination with buildout of the BLHSP and the list of reasonably foreseeable projects presented above
Air Quality, GHG Emissions, and Energy	MCAB (Air Quality); State of California (GHG Emissions); Project site, in combination with buildout of the El Dorado County General Plan and the list of reasonably foreseeable projects presented above (Energy)
Biological Resources	Project site, in combination with buildout of the El Dorado County General Plan and the list of reasonably foreseeable projects presented above
Cultural Resources	Project site and site vicinity ¹
Geology and Soils	Project site and site vicinity ¹
Hazards and Hazardous Materials	Project site and site vicinity ¹
Hydrology and Water Quality	Carson Creek Subwatershed
Land Use and Planning/Population and Housing	Project site and site vicinity (Land Use and Planning); BLHSP (Population and Housing)
Noise	Project site, in combination with buildout of the El Dorado County General Plan and the list of reasonably foreseeable projects presented above
Public Services and Recreation	Project site, in combination with buildout of the El Dorado County General Plan and the list of reasonably foreseeable projects presented above
Transportation	Project site, in combination with buildout of the El Dorado County General Plan and the list of reasonably foreseeable projects presented above
Tribal Cultural Resources	Project site and site vicinity ¹
Utilities and Service Systems	Project site, in combination with buildout of the El Dorado County General Plan and the list of reasonably foreseeable projects presented above
Wildfire	Project site and region
¹ The narrower geographic area is generally due to the site-specific nature of this CEQA topic, as further described in the cumulative section of the corresponding technical chapter.	

5.4 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) identifies an impact category that sometimes must be addressed in EIRs: significant irreversible environmental changes that would be caused by the proposed project, should the project be implemented. CEQA Guidelines Section 15127 states that this impact category need be included only in EIRs prepared in connection with certain categories of projects, one of which is “[t]he adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency.” Although the proposed project is not itself a plan, policy, or ordinance, the proposed project does propose amendments to the General Plan. For this reason, the City has conservatively chosen to address this impact category.

An impact would be determined to be a significant and irreversible change in the environment if:



- Buildout of the project area could involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of development could generally commit future generations to similar uses (e.g., a highway provides access to a previously remote area);
- Development of the proposed project could involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing and eventual development of the project could result in an unjustified consumption of resources (e.g., the wasteful use of energy).

The proposed project would likely result in, or contribute to, the following significant irreversible environmental changes:

- Conversion of predominantly vacant land to a fully built-out mixed-use community, thus precluding alternative land uses in the future; and
- Irreversible consumption of goods and services, such as fire, law enforcement, and school services, associated with the future population; and
- Irreversible consumption of energy and natural resources, such as water and electricity, associated with the future residential and commercial uses.

If the County chooses to approve the proposed project, the County will be concluding that the irreversible environmental changes, and the natural resource consumption that accompanies them, are justified in light of the economic, social, or other benefits that the County might invoke in approving the project. For example, the County might conclude that the economic and social benefits created by the proposed project justify the irretrievable loss of environmental and natural resources.

5.5 SIGNIFICANT AND UNAVOIDABLE IMPACTS

According to CEQA Guidelines, an EIR must include a description of those impacts identified as significant and unavoidable should the proposed action be implemented (CEQA Guidelines Section 15126.2[b]). Such impacts would be considered unavoidable when the determination is made that either mitigation is not feasible or only partial mitigation is feasible such that the impact is not reduced to a level that is less-than-significant. This section identifies significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigations imposed by the County. The final determination of the significance of impacts and the feasibility of mitigation measures would be made by the County as part of the County's certification action. The significant and unavoidable impacts of the proposed project are summarized below.

In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point) or, in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality. (Impact 4.1-3)

Both buildout of the Project Development Area and full project buildout would not significantly change views of the project site from Views B and C. However, views of the existing rural character of the project site from Views 1 through 7 (excluding View 3), as well as View A, would be significantly altered by buildout of the Project Development Area; the aforementioned Views, as well as View 3, would also be significantly altered by full project buildout. Therefore, the existing visual character and quality of public views of the site would be substantially degraded by development of both components of the proposed project. The proposed project would be



required to implement Mitigation Measure 4.1-3. However, even with implementation of Mitigation Measure 4.1-3, the proposed project's impact was determined to remain significant and unavoidable.

Long-term changes in visual character associated with development of the proposed project in combination with future buildout of the El Dorado County General Plan. (Impact 4.1-5)

Development of the proposed project would substantially degrade the visual character and the quality of public views of the project site. In context with the planned development in the project vicinity, the proposed project would contribute towards significantly altering the visual character of the surroundings. The proposed project would be required to implement Mitigation Measure 4.1-3. However, even with implementation of Mitigation Measure 4.1-3, the proposed project's impact was determined to remain significant and unavoidable.

Conflict with or obstruct implementation of the applicable air quality plan during project operation. (Impact 4.2-2)

Full buildout of the proposed project, when considering concurrent operation of the Project Development Area and Program Study Area, would result in reactive organic gas (ROG) emissions above the applicable El Dorado County Air Quality Management District (EDCAQMD) thresholds of significance. Implementation of Mitigation Measures 4.2-2(a) and 4.2-2(b) would reduce the proposed project's operational area and mobile source emissions. However, because the proposed project does not currently include any specific development plans, designs, or proposals for the Program Study Area, the determination as to which specific measures included in Mitigation Measure 4.2-2(a) are feasible for development of the Program Study Area, and their relative effectiveness, cannot be conclusively determined at this time. In addition, the effectiveness of the California Air Pollution Control Officers Association (CAPCOA) measures set forth within Mitigation Measure 4.11-3, implementation of which would be required by Mitigation Measure 4.2-2(b), cannot be quantified at this time and subsequent vehicle trip reduction effects cannot be guaranteed. As such, even with implementation of Mitigation Measures 4.2-2(a) and 4.2-2(b), the proposed project's operational ROG and nitrous oxide (NO_x) emissions would continue to exceed the applicable thresholds of significance. Additional feasible mitigation for the reduction of the proposed project's operational ROG and NO_x emissions to below the applicable thresholds of significance is not currently available. Thus, the impact would remain significant and unavoidable.

Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). (Impact 4.2-6)

The proposed project's maximum unmitigated operational emissions of ROG and NO_x would exceed the applicable EDCAQMD thresholds of significance. Even with implementation of Mitigation Measures 4.2-2(a) and 4.2-2(b) for the Program Study Area, the proposed project would result in emissions that exceed the EDCAQMD thresholds of significance during operations. Therefore, as discussed under Impact 4.2-2, because the proposed project's operational ROG and NO_x emissions would still not be reduced to below the applicable thresholds of significance, and additional feasible mitigation sufficient to reduce the proposed project's operational ROG and NO_x emissions to below the EDCAQMD's thresholds of significance is not



currently available, even with implementation of the following mitigation measure, the proposed project's incremental contribution to the significant cumulative effect would remain cumulatively considerable and significant and unavoidable.

Generation of GHG emissions that may have a significant impact on the environment or conflict with an applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. (Impact 4.2-7)

The proposed project would be considered to generate GHG emissions during construction of the Project Development Area and Project Buildout that would have a significant impact on the environment. In addition, project consistency with the Sacramento Metropolitan Air Quality Management District (SMAQMD) best management practices (BMPs) cannot be ensured at this time. Implementation of Mitigation Measures 4.2-7(a) and 4.2-7(b) would reduce the above potential impacts related to construction GHG emissions, as well as project consistency with BMP-1 and BMP-2 to a less-than-significant level. As a result, the Project Development Area's incremental contribution to the cumulatively significant effects of GHG emissions and global climate change would be reduced to a less than cumulatively considerable level.

With regard to BMP-3, as discussed further in Chapter 4.11, Transportation, of this EIR, mitigation for the vehicle miles traveled (VMT) associated with the residential portion of the Program Study Area can be based on measures identified by CAPCOA. However, several of such measures are already inherently included in the design of the project. Additional CAPCOA measures are included as Mitigation Measure 4.11-3 to reduce the number of vehicle trips that would be generated by the residential component of the Program Study Area. However, the CAPCOA measures included in Mitigation Measure 4.11-3 are not anticipated to reduce per capita VMT by the required 13.83 percent needed to meet the applicable threshold of significance. Consequently, the proposed project would still be considered inconsistent with SMAQMD BMP-3, and the incremental contribution to the cumulatively significant effects of GHG emissions and global climate change related to full Project Buildout, specifically, the residential portion of the Program Study Area, would remain cumulatively considerable and significant and unavoidable.

Cumulative loss of habitat for special-status species and oak woodlands. (Impact 4.3-14)

Project-specific impacts to special-status species and habitats, including oak woodlands, would be reduced to a less-than-significant level with the implementation of mitigation set forth within this chapter. However, consistent with the conclusions of the Bass Lake EIR and the El Dorado County General Plan EIR, the combined effects on biological resources resulting from buildout of the proposed project in combination with approved/planned development throughout the County would be considered significant and unavoidable. The proposed project's incremental contribution to cumulative impacts on special-status species habitat, riparian habitat, State and federally protected wetlands, and oak woodlands during buildout of the Project Development Area and Project Buildout, while reduced through the mitigation measures included in this chapter, could be considered cumulatively considerable. Therefore, the project's contribution to the cumulative loss of habitat for special-status species and oak woodlands identified in the El Dorado County General Plan EIR and the Bass Lake EIR would remain significant and unavoidable.



Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. (Impact 4.4-1)

As discussed further in the Project Description chapter of this EIR, the proposed project would include construction of a future private road, which would extend through the southern portion of the project site from Old Country Club Drive to the surface parking area associated with the hotel/event center. The majority of the historical road would be unimpacted by development of the new private road. However, the future private road would impact a small portion of the historic road segment. In addition, the proposed surface parking area associated with the hotel/event center would encroach on the historic road for approximately 100 feet east of Bass Lake Road. Within the off-site sewer alignment alternatives, the proposed project could result in a potential impact to the resource as a result of excavation or trenching activities associated with the off-site sewer line and use of heavy equipment along Old Bass Lake Road (Lincoln Highway), which could damage the old macadam surfaces. Trenching could potentially impact the character-defining features of the road if the road prism is widened or if the road trenching or excavation is not returned close to its previous surface condition. Mitigation to address potential impacts related to the historic road segments of the Sacramento-Placerville Road, Mormon Hill Road-Lincoln Highway would include completion of a Phase II Archaeological Testing Program in order to recover and document any historical artifacts that lie within the road prism, further evaluation of any historical artifacts found, and the placement of temporary drip fencing in order to protect the historic road segment that occurs within the project site. However, construction of the future private road and surface parking area associated with the hotel/event center cannot feasibly avoid the entirety of the on-site segment of the Sacramento-Placerville Road, Mormon Hill Road-Lincoln Highway. Thus, even with implementation of the Mitigation Measures 4.4-1(a) through 4.4-1(d), the impact would remain significant and unavoidable.

Generation of a substantial permanent increase in ambient noise levels associated with Project Buildout in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Based on the predicted noise levels presented in Table 4.9-35 through Table 4.9-40 of this EIR, combined on-site operational noise level exposure associated with full Project Buildout could exceed applicable El Dorado County General Plan daytime, evening or nighttime exterior noise level standards and/or General Plan increase significance criteria at nearby existing sensitive uses. Implementation of Mitigation Measure 4.9-3 would result in the identification of specific noise mitigation measures designed to reduce noise levels associated with operations of full Project Buildout. While some of the potential noise mitigation measures that may be included as part of the noise impact study could provide appreciable noise level decreases, such measures could be infeasible from a cost, site constraint, engineering or safety standpoint, or may not fully mitigate the noise impacts to a state of compliance with applicable El Dorado County noise level criteria. Thus, the successful implementation of the mitigation measures cannot be guaranteed. Furthermore, depending on the site design of the Program Study Area, implementation of measures, should they be warranted, may not fully mitigate combined noise level exposure from on-site operations associated with full Project Buildout to a state of compliance with applicable El Dorado County noise level criteria at nearby existing sensitive uses. However, due to the identified uncertainties, even with implementation of Mitigation Measure 4.9-3, the proposed project's impact was determined to remain significant and unavoidable.



Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). (Impact 4.11-3)

The residential component of the Program Study Area would generate VMT per resident above the unincorporated El Dorado County baseline average. Feasible mitigation measures to reduce VMT for the Program Study Area residential uses, as identified by CAPCOA, are already designed into the proposed project, such as the mixed-use nature of the proposed project and bicycle connectivity. Additional CAPCOA measures ultimately rely upon an alternative transportation mode, such as transit, being available. Mitigation Measure 4.11-3 focuses on reducing the availability of automobiles to discourage travel. However, according to CAPCOA, the Program Study Area would require a 13.83 percent reduction in VMT to facilitate a less-than-significant finding for VMT impacts under CEQA. Because alternative modes of transportation are not available for the residential portion of the Program Study Area and Mitigation Measure 4.11-3 is not anticipated to reduce per capita VMT by the required 13.83 percent, impacts would remain significant and unavoidable.

Cumulatively conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). (Impact 4.11-6)

The dwelling units constructed as part of the Program Study Area would generate a household VMT per resident of 21.4 under super cumulative conditions, and 22.9 under 2040 horizon year cumulative buildout conditions, which would exceed the 18.8 VMT threshold of significance. Therefore, similar to project-specific impacts, under cumulative conditions, Project Buildout would result in a significant impact related to residential VMT. Mitigation measures that would reduce VMT, as identified by CAPCOA, are already inherently included as part of project design. Additional VMT mitigation, included as Mitigation Measure 4.11-3, would serve to reduce VMT, but not to a less-than-significant level. Therefore, VMT impacts would remain cumulatively considerable and significant and unavoidable.

