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June 25, 2007

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603

Re: Placer Vineyards Workshop #2

Dear Chairman Kranz and Members of the Board,

We are providing the attached brief analysis of the mitigations proposed for the Placer Vineyards project for its impacts to vernal pool complexes. We hope to clarify the reasons that we believe that the current mitigations are inadequate, placing the county in conflict with the federal agencies which will consider permits under the Clean Water Act and the Endangered Species Act.

SC-1

The US Fish and Wildlife Service (FWS) is required to implement its Vernal Pool Recovery Plan. About half of the Placer Vineyards site is in one of the Vernal Pool Recovery Plan Core Areas. The FWS is required to preserve 85% of existing vernal pool resources within these Core Areas. The mitigations required in the EIR do not provide the kind of onsite avoidance or substantial offsite preservation that is likely to be required for FWS to issue a favorable Biological Opinion.

SC-2

A federal EIS is currently being prepared for the Placer Vineyards project. It will likely require major changes to the project to accommodate additional onsite avoidance, or it may couple onsite avoidance with more resources preserved offsite. The county's EIR should have been combined with the EIS, or processed concurrently in order to determine the appropriate mitigations. In the absence of that, we urge the county to reevaluate its vernal pool mitigations.

SC-3

Sincerely,

Terry Davis
Conservation Program Coordinator

Attachments:

- A: Placer Vineyards – Vernal Pools and Potential Mitigations (Sierra Club)
- B: Potential Onsite Avoidance, including PCCP Alternative Map 6 avoidance (base map from the FEIR; annotated)
- C: Vernal Pool Recovery Plan Core Areas in west Placer (from FWS website)
- D: Vernal Pool Complexes as surveyed for Placer Legacy (from GIS data)

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EXHIBIT 2



Placer Vineyards – Vernal Pools and Potential Mitigations

What are the vernal pool resources present onsite?¹

Project EIR	wetted acres plus 250 ft buffers ²	2,182 acres
Placer Legacy	surveyed vernal pool complexes	2,233 acres

¹ Vernal pool systems include the pools and nearby grasslands (the catchment areas). Combined, they are referred to as vernal pool complexes.

² EIR delineated vernal pool complexes by measuring wetted acres plus surrounding 250 ft buffers; the more scientific method notes certain observable characteristics, as in the county surveys.

How many acres of vernal pool complexes are avoided onsite in the current design?

How many acres could USFWS require to be avoided onsite?

Project EIR	69 acres	1,854 to 1,898 acres ⁴
CDFG	0 acres ³	

³ CA Dept. of Fish and Game states that the avoided areas are too small to be credited as functional habitat (DEIR comment letter, 5/19/06)

⁴ Approximately 3,320 acres of the Placer Vineyards site is in the Vernal Pool Recovery Plan Core Areas. Within these areas, the Recovery Plan guidelines call for preservation of 85% of existing vernal pool complexes. The range is based on differing numbers of vernal pool complex acreage onsite as represented in the project EIR versus Placer Legacy surveys.

How many acres are proposed to be preserved offsite by the proponents?

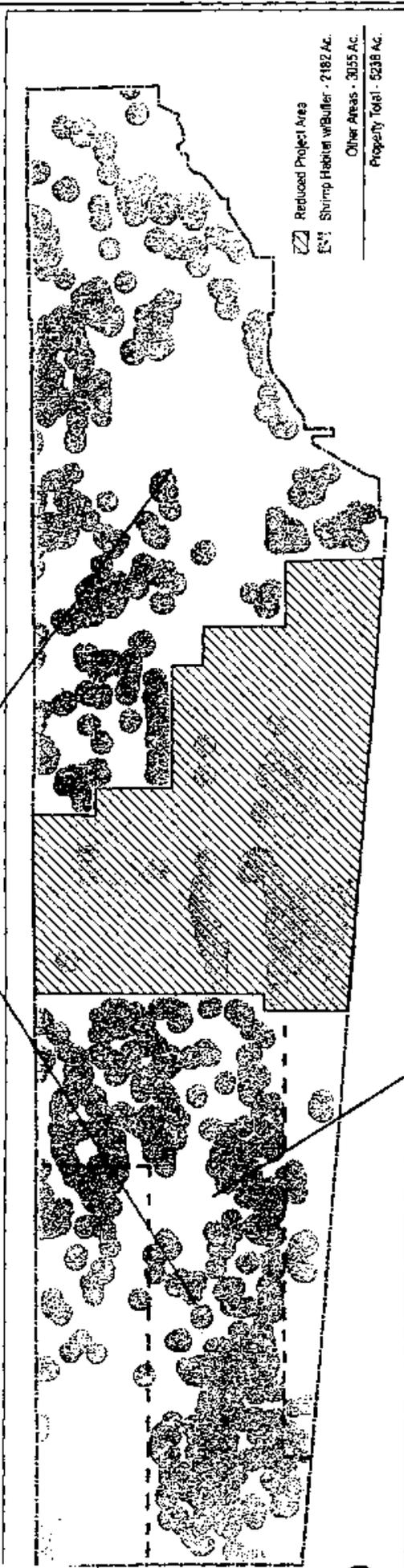
How many acres could USFWS require to be preserved offsite?

190 acres ⁵	11,832 to 12,504 acres ⁶
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⁵ Proponents propose to preserve 190 acres of “vernal pool complex habitat” within the Antonio Mt. Ranch and Redwing properties. They also propose to create an additional 174 acres of vernal pool complexes offsite, but the ability to create fully functional vernal pools is disputed by many scientists. Under the Vernal Pool Recovery Plan USFWS is required to preserve 85% of existing resources.

⁶ The 85% guideline implies a 5.6 to 1 mitigation ratio. The range reflects differing acreages for onsite vernal pool complexes, and whether any avoidance occurs under the current design.

Onsite Avoidance
Declared Infeasible in FEIR



PCCP Map 6
Avoidance Area
(Agency-preferred map)

PLACER VINEYARDS SPECIFIC PLAN
REDUCED PROJECT WITH 85% VERNAL POOL AVOIDANCE

Figure 9

Vernal Pool Recovery Plan Core Areas

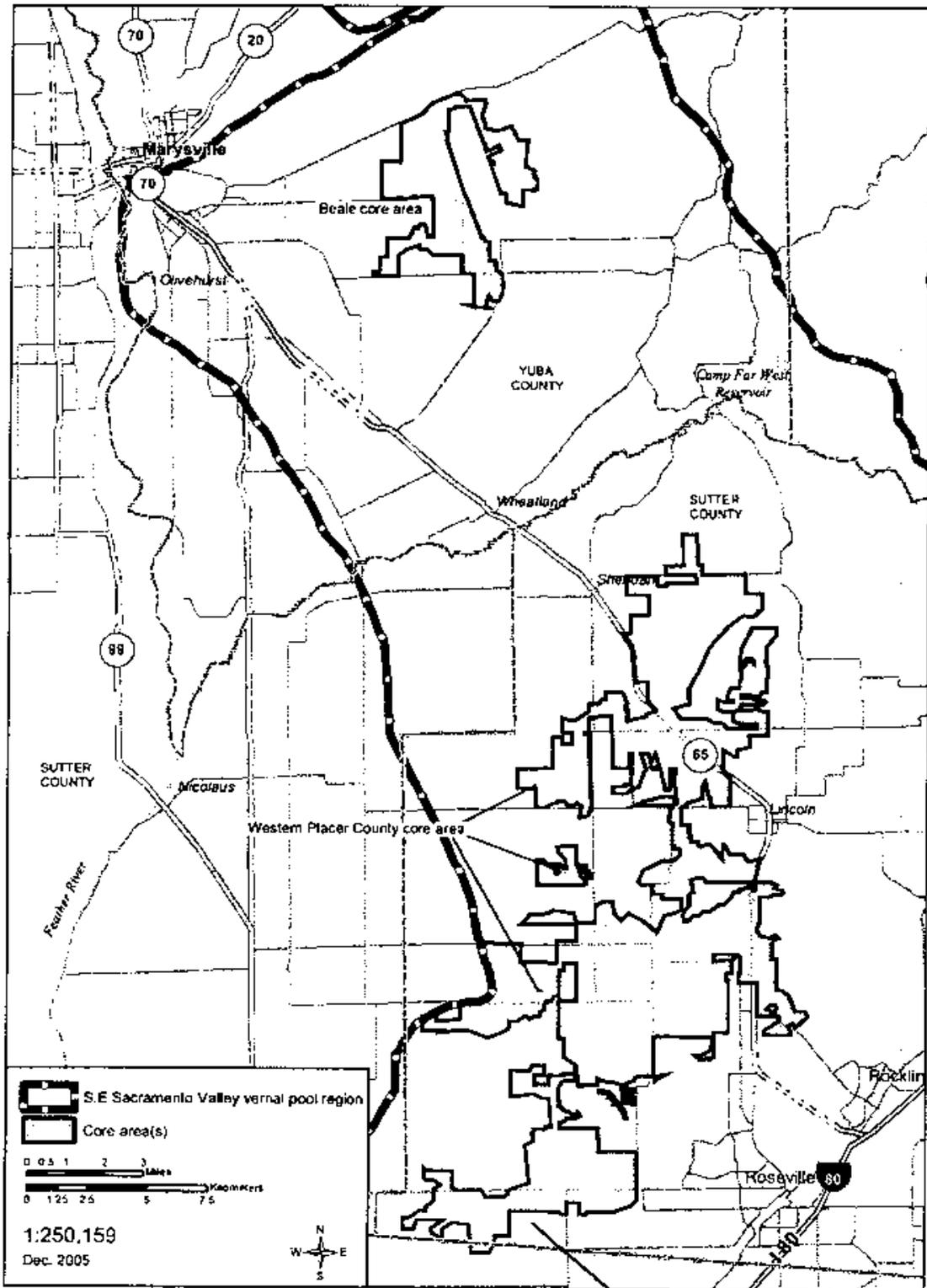


Figure III-14a. Beale and Western Placer County core areas within the Southeastern Sacramento Valley vernal pool region.

III-67

Placer Vineyards Site

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Vernal Pool Complexes on Placer Vineyards Site
Placer Legacy Survey (Glazner)

