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## **3.0 RESPONSES TO COMMENTS**

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# Letter 1

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-4082  
(916) 657-5390 - Fax



September 7, 2011

**RECEIVED**

SEP 09 2011

ENVIRONMENTAL COORDINATION SERVICES

Maywan Krach  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

RE: SCH# 2009022009 Amazing Facts Ministry; Placer County.

Dear Ms. Krach:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Completion (NOC) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological information center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **USGS 7.5 minute quadrangle name, township, range and section required.**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached.**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

1-1

Sincerely,  
*Katy Sanchez*  
Katy Sanchez  
Program Analyst  
(916) 653-4040

cc: State Clearinghouse

## Letter 1 Continued

### Native American Contact List Placer County September 7, 2011

Shingle Springs Band of Miwok Indians  
John Tayaba, Vice Chairperson  
P.O. Box 1340                      Miwok  
Shingle Springs, CA 95682      Maidu  
(530) 676-8010  
(530) 676-8033 Fax

United Auburn Indian Community of the Auburn Rancheria  
Marcos Guerrero, Tribal Preservation Committee  
10720 Indian Hill Road              Maidu  
Auburn, CA 95603                  Miwok  
mguerrero@auburnrancheria.com  
530-883-2364  
530-883-2320 - Fax

Rose Enos  
15310 Bancroft Road                  Maidu  
Auburn, CA 95603                  Washoe  
(530) 878-2378

April Wallace Moore  
19630 Placer Hills Road              Nisenan - So Maidu  
Colfax, CA 95713                  Konkow  
530-637-4279                          Washoe

United Auburn Indian Community of the Auburn Rancheria  
David Keyser, Chairperson  
10720 Indian Hill Road              Maidu  
Auburn, CA 95603                  Miwok  
530-883-2390  
530-883-2380 - Fax

United Auburn Indian Community of the Auburn Rancheria  
Gregory S. Baker, Tribal Administrator  
10720 Indian Hill Road              Maidu  
Auburn, CA 95603                  Miwok  
gbaker@auburnrancheria.  
530-883-2390  
530-883-2380 - Fax

Shingle Springs Band of Miwok Indians  
Nicholas Fonseca, Chairperson  
P.O. Box 1340                      Miwok  
Shingle Springs, CA 95682      Maidu  
nfonseca@ssband.org  
(530) 676-8010  
(530) 676-8033 Fax

Shingle Springs Band of Miwok Indians  
Daniel Fonseca  
P.O. Box 1340                      Miwok  
Shingle Springs, CA 95682      Maidu  
(530) 676-8010  
(530) 676-8033 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2009022009 Amazing Facts Ministry; Placer County.

### LETTER 1: KATY SANCHEZ, NATIVE AMERICAN HERITAGE COMMISSION

#### RESPONSE TO COMMENT 1-1

Chapter 7.0 (Cultural Resources) of the Draft EIR identifies the following actions that were taken to evaluate the potential to impact archeological resources on the site as recommended by the Native American Heritage Commission (NAHC):

- A review of the files maintained at the North Central Information Center (NCIC) of the California Historical Resources Information System was conducted by center staff on November 3, 2009.
- The Project site was completely surveyed in 2003 by Peak & Associates. The team covered the area in 5- to 10-meter-wide transects, carefully checking for evidence of prehistoric or historic resources. Where necessary, small holes were excavated to allow examination of the sediments. There was no evidence of prehistoric or historic sites within the Project site.
- PMC requested a new sacred lands search and a list of Native American contacts from the NAHC and received the results on June 23, 2011 (see Appendix 7.0-3 of the Draft EIR). The results again did not identify any Native American sacred lands within the Project site. PMC again contacted all tribal representation groups on the list provided by the NAHC, through written correspondence in July and August 2008.
- Results of research and field review were documented in the report by Peak and Associates, *Determination of Eligibility and Effect for the Amazing Facts Project, Placer County, California*, December 1, 2009.
- Chapter 7.0 identifies mitigation measure 7-2 that addresses potential impacts associated with accidentally discovered archeological resources, including consultation with the United Auburn Indian Community of the Auburn Rancheria for any discovered resources.

# Letter 2



MIWOK  
MAIDU

United Auburn Indian Community  
of the Auburn Rancheria

David Keyser  
Chairman

Kimberly DuBach  
Vice Chair

Gene Whitehouse  
Secretary

Brenda Conway  
Treasurer

Calvin Moman  
Council Member

September 26, 2011

Maywan Krach  
Environmental Coordination Services  
County of Placer  
Community Development Resource Agency

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OCT 13 2011

ENVIRONMENTAL COORDINATION SERVICES

Subject: Amazing Facts Ministry

Dear Ms. Krach,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and ancestral territory spans into El Dorado, Nevada, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects in your jurisdiction.

In order to ascertain whether or not the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that have been, or will be, completed for the project. We also request copies of future environmental documents for the proposed project so that we have the opportunity to comment on potential impacts and proposed mitigation measures related to cultural resources. The UAIC would also like the opportunity to have our cultural consultants accompany you during the field survey. The information gathered will provide us with a better understanding of the project and cultural resources on site and is invaluable for consultation purposes.

2-1

The UAIC's Preservation Committee has identified cultural resources within your project area and/or in close proximity, and would like to request a site visit to confirm their locations and meet with you regarding this project. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the aforementioned documents as requested. Please contact Marcos Guerrero, cultural resources specialist, at (530) 883-2364 or email at [mguerrero@auburnrancheria.com](mailto:mguerrero@auburnrancheria.com) if you have any questions.

Sincerely,

Gregory S. Baker,  
Tribal Administrator

CC: Marcos Guerrero, UAIC

Tribal Office 10720 Indian Hill Road Auburn, CA 95603 (530) 883-2390 FAX (530) 883-2380

LETTER 2: GREGORY S. BAKER, UNITED AUBURN INDIAN  
COMMUNITY OF THE AUBURN RANCHERIA

**RESPONSE TO COMMENT 2-1**

Appendix 7.0 of the Draft EIR contains the Project's archeological report (Peak and Associates, *Determination of Eligibility and Effect for the Amazing Facts Project, Placer County, California*, December 1, 2009), which included information sent to the United Auburn Indian Community of the Auburn Rancheria (UAIC). Mitigation measure 7-2 in the Draft EIR addresses potential impacts associated with accidentally discovered archeological resources and includes consultation with United Auburn Indian Community of the Auburn Rancheria for any discovered resources. The Final EIR will be provided to the UAIC prior to action on the Project, and a site visit was conducted in February 2012 with the Peak and Associates staff. The commenter is also referred to responses to Comment Letter 19.

# Letter 3

## California Regional Water Quality Control Board Central Valley Region Katherine Hart, Chair



Matthew Rodriguez  
Secretary for  
Environmental Protection

11020 Sun Center Drive, #200, Rancho Cordova, California 95670-6114  
(916) 464-3291 • FAX (916) 464-4645  
<http://www.waterboards.ca.gov/centralvalley>



RECEIVED Edmund G. Brown Jr.  
Governor

OCT 07 2011

7 October 2011

ENVIRONMENTAL COORDINATION SERVICES

Maywan Krach, Environmental Coordination Services  
Placer County  
Community Development Resources Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

CERTIFIED MAIL  
7010 3090 0001 4843 3395

### COMMENTS TO DRAFT ENVIRONMENTAL IMPACT REPORT, AMAZING FACTS MINISTRY PROJECT, SCH NO. 2009022009, PLACER COUNTY

Pursuant to the State Clearinghouse's 2 September 2011 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Draft Environmental Impact Report* for the Amazing Facts Ministry Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

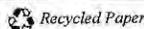
#### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

3-1

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

*California Environmental Protection Agency*



## Letter 3 Continued

Amazing Facts Ministry Project  
SCH No. 2009022009  
Placer County

-2-

7 October 2011

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

3-2

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

3-3

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed for the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

3-4

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916)557-5250.

### **Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. Water Quality Certification must be obtained prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

3-5

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

## Letter 3 Continued

Amazing Facts Ministry Project  
SCH No. 2009022009  
Placer County

-3-

7 October 2011

### **Waste Discharge Requirements**

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

3-6

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

If you have questions regarding these comments, please contact me at (916) 464-4745 or [gsparks@waterboards.ca.gov](mailto:gsparks@waterboards.ca.gov).



Genevieve (Gen) Sparks  
Environmental Scientist  
401 Water Quality Certification Program

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento

### LETTER 3: GENEVIEVE SPARKS, CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

#### **RESPONSE TO COMMENT 3-1**

The requirement for obtaining coverage under the General Permit for Storm Water Discharges Associated with Construction Activities is described on Draft EIR page 13-15 and under Impact 13.1 on Draft EIR page 13-25.

#### **RESPONSE TO COMMENT 3-2**

Phase II MS4 permits are described on Draft EIR page 13-15, and Placer County compliance with the Phase II MS4 permit regulations through the implementation of the Placer County Stormwater Management Plan is described on Draft EIR page 13-20. The Project would be required to address operational water quality impacts consistent with these requirements, and Draft EIR mitigation measure 13-3 requires the provision of permanent best management practices to address operational water quality impacts of the Project. The Placer County Storm Water Management Plan is on file at the Department of Public Works and is available for public review.

#### **RESPONSE TO COMMENT 3-3**

The proposed Project would not consist of industrial-type uses that would require compliance with the Industrial Storm Water General Permit based on review of Attachment 1 of the General Permit.

#### **RESPONSE TO COMMENT 3-4**

Draft EIR page 6-35 identifies anticipated waters of the U.S. that would be filled or indirectly impacted by the proposed Project, as well as the Project's need to obtain permits/approvals under Section 401 and 404 of the Clean Water Act and a 1602 Streambed Alteration Agreement from California Department of Fish and Game. The commenter is referred to mitigation measure 6-6 that provides for obtaining these permits as well as ensuring no net loss of the wetland resources.

#### **RESPONSE TO COMMENT 3-5**

As noted in Response to Comment 3-4, the Draft EIR identifies the need for a 401 Water Quality Certification for the Project.

#### **RESPONSE TO COMMENT 3-6**

The proposed Project does not propose any discharges that would require coverage under a Waste Discharge Permit. Project stormwater discharges are covered as part of the County's compliance with the Phase II Municipal Storm Sewer permit.

## Letter 4

### LAW OFFICES OF DONALD B. MOONEY

DONALD B. MOONEY

129 C Street, Suite 2  
Davis, California 95616  
Telephone (530) 758-2377  
Facsimile (530) 758-7169  
dbm@money@den.org

October 12, 2011

#### VIA ELECTRONIC MAIL AND REGULAR MAIL

Ms. Maywan Krach  
Environmental Coordination Services  
Community Development Resource Agency  
County of Placer  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

**Re: Comments on Draft Environmental Impact Report for Amazing Facts  
Ministry**

Dear Ms. Krach:

The Town of Loomis submits the following comments regarding the Draft Environmental Impact Report ("EIR") for the Amazing Facts Ministry (SCH No. 2009022009).

While the Amazing Facts Ministry Project is located within the County of Placer, Loomis will experience many of the Project's significant environmental impacts in the form of increased traffic on Loomis' roads, including but not limited to Sierra College Boulevard. The Project is one of a series of projects approved by the County and other local agencies that are adjacent to or near the Town of Loomis. The primary access to the new development is from Sierra College Boulevard. A significant portion of Sierra College Boulevard passes through Loomis, which is owned and maintained by Loomis. Thus, not only will Loomis be impacted by the Project's significant traffic and circulation impacts, but Loomis will also be responsible for the improvements and maintenance of Sierra College Boulevard in order to mitigate the Project's significant environmental impacts.

4-1

As discussed below, Loomis objects to the Project on the grounds that the Draft EIR fails to meet the legal requirements as set forth in the California Environmental Quality Act ("CEQA"), Public Resources Code, section 21000 *et seq.*

The Traffic Study prepared for the Project is outdated. Although the Traffic Study is dated August 10, 2010, the Draft EIR indicates that the traffic counts in the Project vicinity were conducted in July 2007. (Draft EIR, p. 9-2.) As a result, the traffic counts relied upon in the Transportation section fail to take into account any development in the vicinity of the Project that has occurred in the last 4 to 5 years. Thus, the Traffic Study is unreliable and does not constitute substantial evidence.

4-2

## Letter 4 Continued

Ms. Maywan Krach  
October 12, 2011  
Page 2

No traffic counts were conducted for the vicinity of Sierra College / Ridge Park Drive intersection. (*Id.*, 9-10.) The Draft EIR indicates that on August 9, 2009, traffic Sierra College / Ridge Park Drive was observed. (*Id.*) The Draft EIR essentially acknowledges that no formal traffic counts were made for this area. The traffic observations were also conducted on a summer weekend when due to vacations there would presumably be more traffic. The traffic counts should have been conducted during a more representative time of the year instead of during the summer months when traffic in this area may be lower. Thus, the traffic study should be updated with current traffic counts conducted at the appropriate time of the year and week.

4-3

The Draft EIR fails to mitigate the traffic impacts at Sierra College Boulevard / Ridge Park Drive. The Draft EIR acknowledges that when Phase II is developed motorists waiting to turn onto Sierra College Boulevard will experience delays that are the equivalent of LOS D, down from an existing condition of LOS C. (Draft EIR p. 9-43.) The Draft EIR attempts to downplay the impact by asserting that the overall condition will remain LOS A. (*Id.*) Contrary to the Draft EIR's conclusions, the change in LOS from C to D constitutes a significant impact that must be mitigated. (See Traffic Impact Analysis, Appendix 9, p. 10 ("At unsignalized intersections LOS C is the minimum, except at locations which already exceed LOS C.") A review of the impacts and mitigation section of the Draft EIR indicates that there is no mitigation for this impact. As a result, the Draft EIR violates CEQA's requirement that impacts be identified and mitigated.

4-4

The Draft EIR indicates that Impact 9.1 will remain significant and unavoidable. (Draft EIR p. 9-39.) The Draft EIR, however, fails to make any determination that there are no feasible mitigation measures that would reduced the impact to less than significant. The proposed mitigation measure is the good faith effort to pay to the City of Rocklin the applicable fair share fee toward the cost of the construction of a second northbound left turn lane. Nothing in the Draft EIR indicates that the construction of the second northbound left turn lane would not be feasible. The failure to address feasible mitigation measures violates CEQA.

4-5

Very truly yours,

  
Donald B. Mooney  
Attorney for Town of Loomis

cc Perry Beck, Town Manager, Town of Loomis  
Matt Lopez, Town Planner  
Jeffrey Mitchell, Town Attorney

### LETTER 4: DONALD B. MOONEY, LAW OFFICES OF DONALD MOONEY

#### RESPONSE TO COMMENT 4-1

Draft EIR Chapter 9.0 (Traffic and Circulation) and Chapter 18.0 (Cumulative, Growth-Inducing, and Irreversible Impacts) provides an extensive analysis of the Project's direct and cumulative traffic impacts to Sierra College Boulevard. While it is acknowledged that the Town of Loomis maintains portions of Sierra College Boulevard, the cities of Rocklin and Roseville and Placer County also maintain portions of this roadway. Mr. Mooney's concerns regarding the adequacy of the Draft EIR traffic analysis are responded to below in Response to Comments 4-2 through 4-5.

#### RESPONSE TO COMMENT 4-2

While Mr. Mooney suggests that the traffic analysis for the Project is outdated as a result of traffic counts being conducted in July 2007, he provides no evidence or technical analysis that identifies how this results in the traffic analysis being inadequate for the purposes of CEQA. The Draft EIR identifies traffic counts for Sierra College Boulevard in the vicinity of the Project site of 19,150 vehicles in 2008, higher than recent traffic counts conducted by the City of Roseville that identified an average daily traffic volume of 17,187 vehicles north of Secret Ravine Parkway in May 2011 (City of Roseville, 2011a).

It should be noted that development activity and growth in the Project area (cities of Roseville and Rocklin, Town of Loomis, and Placer County) have substantially slowed since 2007, which would have impacted traffic volumes in the area to the extent that would alter the conclusions of the traffic analysis and the Draft EIR. Between 2007 and 2010, building permit issuance by the City of Rocklin was reduced by 54 percent for new residential units and 84 percent for new nonresidential uses (commercial and industrial), while building permit issuance by the City of Roseville was reduced by 45 percent for new residential and 87 percent for new nonresidential (City of Rocklin, 2011; City of Roseville, 2011b).

#### RESPONSE TO COMMENT 4-3

The traffic consultant collected traffic count data for the Sierra College Boulevard/Ridge Park Drive intersection on August 9, 2009. The traffic study was updated at that time to include this intersection in the study analysis. Furthermore, the Draft EIR identifies traffic counts for Sierra College Boulevard in the Project site vicinity site of 19,150 vehicles in 2008, higher than recent traffic counts conducted by the City of Roseville in May 2011 that identified an average daily traffic volume of 17,187 vehicles north of Secret Ravine Parkway (City of Roseville, 2011a). The Project applicant's representative has met with the Sierra Ridge Estates Homeowners Association. As noted in Chapter 1.0 (Introduction), the Project applicant has proposed (as part of the Project) to re-stripe a portion of Sierra College Boulevard from Nightwatch Drive to El Don Avenue (see **Figure 1-4**). This re-striping would result in a complete four-lane Sierra College Boulevard from City of Roseville city limits to Interstate 80 (I-80). This re-striping was reviewed by KD Anderson & Associates regarding potential changes in traffic impacts identified in the Draft EIR. This analysis is provided in **Appendix A**. The restriping would improve the delay time for westbound movement at the Sierra College Boulevard/Ridge Park Drive intersection by 4.3 seconds under Existing Plus Approved Projects Plus Project Saturday

Peak Hour Conditions and would improve the level of service (LOS) of this movement from F to E under Cumulative Plus Project Saturday Peak Hour Conditions.

### **RESPONSE TO COMMENT 4-4**

Standard Placer County determination of adequate intersection operation for level of service purposes is based on how the overall intersection operates, rather than a single movement. The majority of traffic volume at the Sierra College Boulevard/Ridge Park Drive intersection is through traffic on Sierra College Boulevard, while only nine vehicles utilized Ridge Park Drive (see Draft EIR Figure 9-8). Thus, this is not considered a significant intersection operation impact in the Draft EIR and no mitigation is required.

### **RESPONSE TO COMMENT 4-5**

The determination of feasibility is based on the fact that this intersection is located within the City of Rocklin and that there is no City capital improvement project for this intersection with a fee program established. This facility is also not identified in SPRTA (see Draft EIR page 9-39). When implementation of a mitigation measure falls outside of the unincorporated areas of Placer County, the impact must be considered “significant and unavoidable” in the EIR because it is not within Placer County’s power to enforce, unless there is a memorandum of understanding with that jurisdiction to implement mitigation measures on Placer County’s behalf.

## Letter 5



110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • [www.placer.ca.gov/apcd](http://www.placer.ca.gov/apcd)

Thomas J. Christofk, Air Pollution Control Officer

### MEMORANDUM

Date: October 13, 2011  
To: Maywan Krach, Environmental Coordinator  
From: Tom R. Thompson, Associate Planner  
Subject: **Review of Draft EIR for Amazing Facts Ministry (PEIR 20080021)**

The Placer County Air Pollution Control District (District) has reviewed the Draft EIR for the Amazing Facts Ministries project and has the following comments:

1. It is not clear why "Path 2" was removed from mitigation measure 16-2d ("Energy Efficient Building Paths"). Previous environmental documents included Paths 1, 2, and 3. Please clarify. In addition, on page 16-20, only Path 1 and Path 3 are listed. The District recommends that the Lead Agency consider re-inserting Path 2 as an option. 5-1
2. Within mitigation measure 16-2d (page 2-59 and page 16-20) the District recommends removal of the wording "... as determined feasible". If a mitigation measure is not feasible, then the DEIR should explain why it is not feasible. 5-2
3. The data in Table 10-9, "Total Long Term Area Source Unmitigated Emissions", appears to be inconsistent with the URBEMIS output files included in the appendices. Note that the "worst case scenario" (either summer emissions or winter emissions, not the average of the two) should be included in the analysis. Please verify and correct where needed. 5-3
4. It is assumed that all of the air quality modeling analysis included data that describes **two** Saturday services for both Phase 1 and Phase 2. The cumulative total number of vehicle trips per day (not "peak hour" trips) should be incorporated into the calculations for all air quality analysis data including GHG emission factors. Please confirm. In addition, to avoid any confusion in the future, all references that the project "may add a second service" should be deleted from the DEIR, particularly if two services were included in the analysis. 5-4
5. Table 16-5 appears to include the total CO<sub>2</sub> reduction with the incorporation of "MM 16-2a – 16-2f". If this statement is correct, then the reduction also includes MM-16-2d, which includes both Path 1 and Path 3. After reviewing the Technical Appendices it is not clear which of these two paths was used to represent the 324 metric tons/year of CO<sub>2</sub> reduction listed in Table 16-5. Please provide a summary of output files as to how this number was achieved. 5-5
6. Within Table 16-2 (page 16-17) transfer "solid waste" (33 tons per year) over to the last column in order to equal the Total CO<sub>2e</sub> emissions. 5-6

## Letter 5 Continued

7. As the District has previously pointed out, when a jurisdiction does not have an established GHG threshold, we recommend that Lead Agencies choose a GHG threshold that has already been established and has been utilized by other jurisdictions and agencies. Within the Draft EIR the project proponent has chosen the San Joaquin Valley Air Pollution Control District's (SJVAPCD) threshold of a 29% reduction of CO<sub>2</sub> as a basis for their GHG analysis. However, the proposed project only achieves a reduction of 20% CO<sub>2</sub> (based on Table 16-5). Please note that, for your consideration, there are many additional mitigation measures which could potentially be included within the scope of this project in order to increase the CO<sub>2</sub> reduction from 20% to 29%, thus meeting the spirit and intent of the SJVAPCD threshold. It is up to the Lead Agency, not the PCAPCD, to determine whether or not the projects proposed 20% reduction is an adequate threshold for meeting the goals of AB32.

5-7

LETTER 5: TOM R. THOMPSON, PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

**RESPONSE TO COMMENT 5-1**

Path 2 consisted of the following:

Provide an on-site renewable energy generation (solar, wind, etc.) system capable of producing at least 12% of the building's total electrical load OR at least 20% of the building's hot water demand.

This mitigation measure was considered infeasible given the anticipated cost of the systems, design of the buildings, and the likely visual impact of these features on the Project. Specifically, given the exposure of portions of the buildings to the south, and the design of the buildings, any roof-mounted solar panels would need to be set on the flat roofs at an angle of approximately 20 percent slope and said panels could cause reflections which would be visible. Based on the Go Solar California Clean Power Estimator, the cost of a photovoltaic solar power-generating system for the Project site would be approximately \$172,000 for each 20 metric tons reduction of GHG emissions per year (as identified in Draft EIR Table 16-5, the Project needs an additional 9 percent reduction [approximately 519 metric tons] in GHG emissions).

The use of any wind-generating devices would likely compromise the architectural integrity of the building elevations and such devices would also be visible to neighboring properties.

**RESPONSE TO COMMENT 5-2**

Mitigation measure 16-2d includes a menu of energy-efficient measures for the Project. It is expected that the Project will implement most if not all of the measures listed under Path 1. Although it is noted on Draft EIR page 16-21 that mitigation measure 16-2d was not factored into greenhouse gas (GHG) reduction estimates given this uncertainty.

**RESPONSE TO COMMENT 5-3**

As stated in Draft EIR Table 10-9, the reported area source emissions (and mobile source emissions) shown do represent the average of summer and winter emissions and are consistent with the URBEMIS output data.

The following tables are added to the Draft EIR after Table 10-9 on page 10-24. This additional information does not alter the less than significant impact conclusion for Impact 10-2.

**TABLE 10-9A**  
**TOTAL LONG-TERM AREA SOURCE UNMITIGATED SUMMER EMISSIONS**  
**(MOBILE SOURCE – SATURDAYS)**

<u>Scenario</u>	<u>Daily Emissions (Lbs/Day)</u>				
	<u>ROG</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM<sub>10</sub></u>	<u>PM<sub>2.5</sub></u>
<b>Project Buildout (Completion of Phase I and Phase II)</b>					
<u>PCAPCD Significance Criteria (lbs/day)</u>	<u>82</u>	<u>82</u>	<u>550</u>	<u>82</u>	<u>N/A</u>
<u>Area Sources</u>	<u>1.62</u>	<u>2.05</u>	<u>4.78</u>	<u>0.01</u>	<u>0.01</u>
<u>Mobile Sources (Saturday)</u>	<u>21.05</u>	<u>30.30</u>	<u>261.00</u>	<u>47.18</u>	<u>9.12</u>
<b>Total</b>	<u>22.67</u>	<u>32.35</u>	<u>265.78</u>	<u>47.19</u>	<u>9.13</u>
<u>Significance Potential?</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>

**TABLE 10-9B**  
**TOTAL LONG-TERM AREA SOURCE UNMITIGATED WINTER EMISSIONS**  
**(MOBILE SOURCE – SATURDAYS)**

<u>Scenario</u>	<u>Daily Emissions (Lbs/Day)</u>				
	<u>ROG</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM<sub>10</sub></u>	<u>PM<sub>2.5</sub></u>
<b>Project Buildout (Completion of Phase I and Phase II)</b>					
<u>PCAPCD Significance Criteria (lbs/day)</u>	<u>82</u>	<u>82</u>	<u>550</u>	<u>82</u>	<u>N/A</u>
<u>Area Sources</u>	<u>1.37</u>	<u>2.01</u>	<u>1.69</u>	<u>0.00</u>	<u>0.00</u>
<u>Mobile Sources (Saturday)</u>	<u>27.14</u>	<u>43.41</u>	<u>298.52</u>	<u>47.18</u>	<u>9.12</u>
<b>Total</b>	<u>28.51</u>	<u>45.42</u>	<u>300.21</u>	<u>47.18</u>	<u>9.12</u>
<u>Significance Potential?</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>	<u>NO</u>

#### RESPONSE TO COMMENT 5-4

As stated on page 10-23 of the Draft EIR, traffic information used to generate the vehicle emissions was gathered from the Traffic Impact Analysis (TIA) for the Project as well as supplemental information provided by KD Anderson & Associates. The Project is estimated to generate 3,700 average daily trips (ADT) during an average Saturday after Phase I and Phase II (KD Anderson & Associates, 2010). The updated analysis included the traffic generated by two Saturday services; thus, no change to the Draft EIR is recommended.

#### RESPONSE TO COMMENT 5-5

As noted above in Response to Comment 5-2, mitigation measure 16-2d was not factored in the quantification of the GHG reductions. The following correction is made to Table 16-5 on Draft EIR page 16-22:

**TABLE 16-5  
SUMMARY OF PROJECT GHG REDUCTIONS**

Emissions Reduction Summary	CO <sub>2</sub> Emissions (Metric Tons/Year)
Total Business-as-Usual (BAU) Emissions	6,132
Project-Related CO <sub>2</sub> e Reduction (mitigation measures 16-2a, b, c, and e—16-2f)	324
Regulatory Reduction	935
Total GHG Emission Reduction	1,259
<b>Remaining Emissions</b>	<b>4,873</b>
Percentage Reduction from Business as Usual	20
District Percentage Reduction Threshold for Less than Significant Determination	29

**RESPONSE TO COMMENT 5-6**

Draft EIR Table 16-2 on page 16-17 is amended as follows:

**TABLE 16-2  
ESTIMATED PROJECT GREENHOUSE GAS EMISSIONS – PROJECT OPERATION  
UNDER BAU OPERATIONS (CO<sub>2</sub>E METRIC TONS PER YEAR)**

Emission Source	Carbon Dioxide (CO <sub>2</sub> )	Methane (CH <sub>4</sub> )	Nitrous Oxide (N <sub>2</sub> O)	Hydrofluorocarbons (HFCs)	Perfluorocarbons (PFCs)	Sulfur Hexafluoride (SF <sub>6</sub> )	CO <sub>2</sub> e
Mobile Source <sup>1</sup> (vehicle)	4,838	N/A	N/A	N/A	N/A	N/A	4,838
Area Source (on-site heating and cooling equipment, landscaping, consumer products)	400	N/A	N/A	N/A	N/A	N/A	400
Stationary Source	Electricity	556	Negl.	Negl.	Negl.	Negl.	556
	Natural Gas	268	Negl.	Negl.	Negl.	Negl.	268
Water and Wastewater Conveyance/Treatment	37	Negl.	Negl.	Negl.	Negl.	Negl.	37
Solid Waste	33	Negl.	Negl.	Negl.	Negl.	Negl.	<del>Negl.</del> 33
<b>Total CO<sub>2</sub>e Emissions (BAU)</b>	<b>6,132</b>						

**RESPONSE TO COMMENT 5-7**

The utilization of San Joaquin Valley Air Pollution Control District thresholds of significance and guidelines for greenhouse gases was utilized in the Draft EIR based on several consultations with the Placer County Air Pollution Control District (PCAPCD) and County staff.

While the PCAPCD suggests there are many mitigation measures that could further reduce GHG emissions, no additional recommendations are provided in this comment letter. As part of the preparation of the Draft EIR, the following mitigation measure options, in addition to Paths 2 and 3, were considered and rejected as infeasible:

- **Provision of transit directly to the site** – Currently neither the City of Roseville nor Placer County Transit provide transit service near the Project (nearest locations along Sierra College Boulevard are at Rocklin Road and Olympus Parkway). Mitigation measure 16-2b includes the provision of a bus stop. However, the operation of a transit service for this use type (house of worship) that has operations limited to a few days and hours in a week and the distribution of its members in the area (rather than concentrated in one area) is considered infeasible.
- **Reductions in parking provided** – While this measure can be effective for mixed-use developments that provide opportunities to accommodate multiple services in one trip with alternative forms of transportation available, the Project is a single use (house of worship) that has operations limited to a few days and hours in a week. In addition, a reduction in parking standards would require approval of a variance and the associated determination of unique circumstances on the site to reduce the standards that could not be met under County standards.
- **Additional energy efficiency and use of renewable energy** – As identified in Response to Comments 5-1 and 5-2, these additional measures were determined infeasible for the Project and could also result in greater visual impacts.

Path 3 was considered, but due to the lack of detailed building plans at this stage, it is not feasible to accurately calculate if the ultimate building design and construction methods will be such that the minimum California energy efficiency standards can be exceeded by 15 percent.

Based on the analysis provided on Draft EIR page 16-22, 519 metric tons of CO<sub>2</sub> equivalent Project GHG emissions reductions are needed to reduce the project's impact to less than significant. The EIR consultant has reviewed additional mitigation measure options in consultation with the Placer County Air Pollution Control District and is proposing the purchase of GHG offset credits (also referred to as carbon credits). A discussion of the current status of GHG offset credits in California is provided below.

### *Overview Carbon Credit Programs*

The AB 32 Scoping Plan identifies cap-and-trade as a key strategy for helping California reduce its GHG emissions. A cap-and-trade program sets the total amount of greenhouse gas emissions allowable for facilities under the cap and allows covered sources, including producers and consumers of energy, to determine the least expensive strategies to comply. The California Air Resources Board (CARB) adopted the final cap-and-trade regulation on October 20, 2011, and AB 32 requires the program to begin in 2013.

While uncertainty remains in the details of cap-and-trade, carbon offset credits are one potential option for achieving emissions reductions. Carbon offset credits are created through the development of projects, such as renewable energy generation or carbon sequestration projects, that achieve the reduction of emissions from activities not otherwise regulated, covered under an emissions cap, or resulting from government incentives. Offsets are verified reductions of emissions whose ownership can be transferred to others. As required by AB 32, any reduction of GHG emissions used for compliance purposes must be real, permanent, quantifiable, verifiable, enforceable, and additional. Offsets used to meet regulatory requirements must be quantified according to CARB-adopted methodologies, and CARB must adopt a regulation to verify and enforce the reductions. The criteria developed will ensure that the reductions are quantified accurately and are not double-counted within the system

Several registries of carbon offset credits have emerged in the United States in recent years. In the absence of mandatory GHG reduction requirements, these registries record and transfer ownership of offset credits for the voluntary market. The voluntary market has developed to serve those individuals, businesses, and institutions wishing to offset their own emissions, even in the absence of a regulatory requirement, or who are preparing for anticipated regulatory requirements. Registries facilitate and give legitimacy to carbon offset credit tracking and trading. One of the leading registries, the Climate Action Reserve (CAR), is anticipated to serve as a source of regulatory offsets under the future California cap-and-trade program. CAR is a spin-off program of the California Climate Action Registry (CCAR), which was created by California state legislation in 2001. It has been involved with CARB throughout the AB 32 implementation process, including the development of its reporting rule, verification scheme, and several sector-specific accounting protocols. CAR is respected as a national project registry that sets standards, accredits verifiers, and registers and tracks projects using sophisticated software to serialize and transfer emission reduction credits. In 2009, CAR transactions accounted for the majority of the U.S. offset market value, and CAR Climate Reserve Tons (CRTs) usually command a premium over the general voluntary offset market.

CRTs are well-respected as being among the highest quality offsets available. They meet the criteria of being real, permanent, additional, verifiable, and enforceable. CAR utilizes a standardized approach for the independent and rigorous verification of GHG emissions reductions reported by project developers into its offset registry. This standardized approach defines a verification process that promotes the relevance, completeness, consistency, accuracy, transparency, and conservativeness of emissions reductions data reported in the CAR.

Project verification is a key aspect of the CAR and its key objectives are to:

- Ensure projects are real, additional, permanent, verifiable and enforceable;
- Minimize the risk of invalid creation or double counting of CRTs;
- Support the transparency and integrity of the data contained within the CAR;
- Maintain that verifications are conducted in a consistent and comparable manner across projects; and
- Assist the Reserve in monitoring project developer's ongoing compliance with the CAR's protocols.

Verification activities differ based on the complexity of project developers' GHG emissions reductions or removals and the underlying data supporting them. However, the verification process will include, at a minimum, the following steps:

- Notification of verification activities and case-by-case evaluation of conflict of interest
- Scoping and planning project verification activities
- Desk review and annual site visit to conduct project verification activities:
  1. Identifying emissions sources and assess risk of material misstatements
  2. Reviewing methodologies and management systems
  3. Verifying emission reduction calculations
- Preparing a project developers verification report, list of findings, and verification statement and submitting them through the CAR, (see <http://www.climateactionreserve.org>)

Based on the above, the purchase of carbon offset credits through the CAR would meet CEQA’s definition of feasible mitigation (CEQA Guidelines Section 15364) and is added to Draft EIR page 16-16 and 16-22 with the following text changes:

Draft EIR page 16-16, the following text changes are made:

**SIGNIFICANCE AFTER MITIGATION**

Mitigation measure **16-1** and **16-2f** would ~~reduce~~ mitigate the Project’s carbon footprint during construction activities during Phase I. Specifically, mitigation measure 16-2f would require the purchase of carbon credits to offset Project construction and operational GHG emissions. This would not offset GHG emissions from construction. ~~While GHG emissions from construction are a temporary condition, there are no established standards of significance for construction GHG emissions to determine if this impact is mitigated.~~ Thus, this impact would be mitigated to less than significant. ~~is considered significant and unavoidable.~~

Draft EIR page 16-22, the following text changes are made:

**SIGNIFICANCE AFTER MITIGATION**

Reductions achieved through state-led GHG-reducing regulations are shown in **Table 16-3**. **Table 16-4** provides estimates of the emissions reductions that will result from implementation of the above proposed Project’s GHG-reducing mitigation. When the reductions from **Table 16-3** and **Table 16-4** are totaled (see **Table 16-5**), the amount of GHG reduction is 1,259 metric tons of CO<sub>2</sub>e per year. This amount represents a reduction of 20 percent from the BAU figure of 6,132 metric tons of CO<sub>2</sub>e per year.

**TABLE 16-5  
SUMMARY OF PROJECT GHG REDUCTIONS**

<b>Emissions Reduction Summary</b>	<b>CO<sub>2</sub> Emissions (Metric Tons/Year)</b>
Total Business-as-Usual (BAU) Emissions	6,132
Project-Related CO <sub>2</sub> e Reduction (mitigation measures 16- a, b, c, and e— <del>16-2f</del> )	324
Regulatory Reduction	935
Total GHG Emission Reduction	1,259
<b>Remaining Emissions</b>	<b>4,873</b>
Percentage Reduction from Business as Usual	20
District Percentage Reduction Threshold for Less than Significant Determination	29

The GHG emissions from the proposed Project are projected to result in 4,873 metric tons of CO<sub>2</sub>e per year (**Tables 16-2** through **16-5**). As the proposed Project would reduce projected BAU emissions by just 20 percent, the Project is not considered consistent with the State of California’s ability to meet its AB 32 goals (project compliance with SJVAPCD guidelines equates to compliance with AB 32). Thus, the following GHG emission offset (carbon credits) mitigation is proposed that would either require the purchase of woodland or forest acreage through the

Climate Action Reserve (CAR) to sequester measurable and verifiable carbon, and/or ensure that other types of carbon credits are purchased through CAR to offset the remaining percent necessary (currently calculated at approximately 519 metric tons annually) to attain the required 29 percent reduction of the Project's GHG emissions. These GHG emission offset credits would be intended to cover the on-going GHG emissions of Project's operation. ~~the proposed Project's contribution to cumulative GHG emissions is considered **cumulatively considerable** and a **significant and unavoidable** impact.~~

### **Mitigation Measure 16.2f Purchase Carbon Credits**

The Project applicant shall purchase carbon offset credits that are 1) from the Climate Action Reserve (CAR) registry or other similar entity as determined acceptable by the Placer County Air Pollution Control District (PCAPCD), and 2) quantified through an approved protocol by either the State of California or other similar entity and verified by a qualified verification body (accredited by either the Climate Action Reserve or the State of California, or other similar entity as determined acceptable by the PCAPCD. These carbon credits may include, but shall not be limited to: woodland, including woodlands preserved through mitigation measure 6-9, or forest acreage to attain measurable and verifiable carbon sequestration, and/or purchase of other types of carbon credits through CAR or other similar entities as determined acceptable by the PCAPCD to offset that amount of greenhouse gas emissions necessary to achieve the required 29 percent reduction of the Project's GHG emissions measured against Business As Usual. These carbon credits would be used to offset both construction and on-going GHG emissions of the Project. Prior to purchase, the applicant shall provide a thorough analysis to the PCAPCD for review and approval. This analysis shall include the Project's estimated emissions, calculation methodology and proposed offset purchase. The applicant shall submit either the purchase certification from CAR registry, or verification certification issued by a qualified verification body for all carbon offset credits purchased, to the Placer County Building Department prior to issuance of building permits.

CAR utilizes a standardized approach for the independent and rigorous verification of GHG emissions reductions reported by project developers into its offset registry. This standardized approach defines a verification process that promotes the relevance, completeness, consistency, accuracy, transparency and conservativeness of emissions reductions data reported in the CAR. Thus, implementation of mitigation measure 16.2f (in combination with mitigation measures 16.2a through e) would reduce the Project GHG emissions 29 percent from BAU, and would reduce this impact to **less than cumulatively considerable**.

Letter 6



**Placer County  
Museums Division**

101 Maple Street, Auburn CA 95603

Tel (530) 889-6500 ♦ Fax (530) 889-6510

**MEMORANDUM**

TO: Maywan Krach  
FROM: Ralph Gibson  
SUBJ: Amazing Facts Ministries Project  
DATE: October 17, 2011

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I have reviewed the materials for the Amazing Facts Ministries project and I reviewed historic maps in our Archives and Research Facility. I also closely examined the Cultural Resources information in the appendices of the EIR. Though a survey by qualified archaeologists failed to uncover any historic or prehistoric sites, I believe the possibility of accidental discovery of artifacts or burials to be moderately high.

Therefore, I recommend a policy be drafted outlining procedures if human remains or artifacts are discovered during the project. Procedures in case of artifact discovery should involve consultation with an archaeologist, a representative from the Placer County Museums, a representative from the California Native American Heritage Commission (if prehistoric), and a representative of the United Auburn Indian Community (if prehistoric).

If you have any questions or need further information please feel free to contact me at:  
530-889-6502 or [rgibson@placer.ca.gov](mailto:rgibson@placer.ca.gov)

6-1

LETTER 6: RALPH GIBSON, PLACER COUNTY MUSEUMS DIVISION

**RESPONSE TO COMMENT 6-1**

Draft EIR Chapter 7.0 identifies mitigation measure 7-2 that addresses potential impacts associated with accidentally discovered archeological resources, including coordination with a qualified archeologist and the Placer County Planning Department and Museums Division, and consultation with the United Auburn Indian Community of the Auburn Rancheria for any discovered resources. The Native American Heritage Commission was consulted during the preparation of the Draft EIR.

Letter 7



PLACER COUNTY WATER AGENCY  
 SINCE 1887  
 BOARD OF DIRECTORS BUSINESS CENTER  
 Gray Allen, District 1 144 Ferguson Road  
 Alex Ferreira, District 2 MAIL  
 Lowell Jarvis, District 3 P.O. Box 6570  
 Mike Lee, District 4 Auburn, CA 95604  
 Ben Mavy, District 5 PHONE  
 David Breninger, General Manager 530.823.4850  
 Ed Tiedemann, General Counsel 800.464.0030  
 WWW.PCWA.NET

October 17, 2011  
File No. WA/Granite Bay

RECEIVED

OCT 18 2011

ENVIRONMENTAL COORDINATION SERVICES

Maywan Krach, Community Development Technician  
Environmental Coordination Services  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

SUBJECT: Environmental Impact Report for the proposed  
Amazing Facts Ministries (PEIR T20080021)  
(APN 046-050-006, 008)

Dear Maywan:

Placer County Water Agency (PCWA) has reviewed the EIR for the project mentioned above and has the following comments.

Treated water can be made available to the project from the Agency's 20" treated water main in Sierra College Boulevard.

Additional demands placed on this system may have a detrimental effect on existing customers due to relatively low system pressures in the system area. The project may require a hydraulic analysis to define whether there is sufficient capacity and pressure to supply the proposed and existing water system under the proposed usage, and to identify any additional improvements necessary to supply the project and maintain adequate pressures throughout the system.

7-1

Other developers have expressed interest in constructing offsite improvements necessary to provide adequate fire flow and pressures for further development in this area. The Agency is currently working with these developers on an offsite improvement Facilities Agreement that may provide for reimbursement of certain costs for projects benefiting from the offsite improvements.

The project description indicates that there is an existing well on the property. Any property with a dual source of water will require the installation of an approved backflow prevention device to protect the public water supply.

7-2

## Letter 7 Continued

In order to obtain service, the developer will have to enter into a facilities agreement with the Agency to provide any on site or off site pipelines or other facilities if they are needed to supply water for domestic or fire protection purposes and pay all fees and charges required by the Agency, including the Water Connection Charges.

7-3

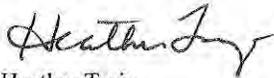
The Agency does not reserve water for prospective customers and this letter in no way confers any right or entitlement to receive water service in the future. The purpose of this letter is to apprise you of the current status of water availability from the Agency's treated water system at the location specified above. The Agency makes commitments for service only upon execution of a facilities agreement and the payment of all fees and charges required by the Agency.

7-4

All water availability is subject to the limitations described above and the prior use by existing customers.

If you have any questions, please call me at the Engineering Department at (530) 823-4886.

Sincerely,



Heather Trejo  
Environmental Specialist

HT:vf

z:/engfiles/pre-dev/wa/046-050.006,008.2

**LETTER 7: HEATHER TREJO, PLACER COUNTY WATER AGENCY**

**RESPONSE TO COMMENT 7-1**

The Draft EIR identifies that the Project area has low system pressures in Impact 14.7.2 on page 14-38 and includes discussion regarding offsite infrastructure. Mitigation measure 14.7-2 requires the Project to enter into a facilities agreement with the Placer County Water Agency (PCWA) for financial participation in any additional improvements required to the existing system.

**RESPONSE TO COMMENT 7-2**

The Project is not proposing to utilize the existing well and would abandon the well as part of site development.

**RESPONSE TO COMMENT 7-3**

The Draft DEIR evaluated off-site water infrastructure and confirmed there is an existing 20-inch line adjacent to the Project, at the intersection of Sierra College and Nightwatch, to which it will connect. As noted above in Response to Comment 7-1, the Project would enter into a facilities agreement associated with mitigation measure 14.7-2.

**RESPONSE TO COMMENT 7-4**

It is acknowledged that the PCWA does not reserve water. Section 14.7 of the Draft EIR identifies that adequate water supplies exist to serve the Project once developed. The project will be conditioned to provide a “will-serve” letter from PCWA for water service prior to approval of improvement plans.

# Letter 8

## City of Rocklin



3970 Rocklin Road  
Rocklin, California 95677-2720  
O | 916.625.5000  
F | 916.625.5095

October 17, 2011 [www.rocklin.ca.us](http://www.rocklin.ca.us)

Maywan Krach  
Environmental Coordination Services  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

RE: Comments on Amazing Facts Ministry Draft EIR

Dear Maywan:

Thanks for the opportunity to review and comment on the above-referenced document. Per the Notice of Availability, the proposed project is a 74.2 acre site bordered by Sierra College Boulevard on the north, between Nightwatch Drive and Ridge Park Drive. The project includes the construction of a 17-acre campus to be constructed in two phases (Phase 1 consists of a 106,800 square foot multi-use building and a separate 11,220 square foot resource center building; phase 2 consists of a 90,000 square foot multi-use building that will serve as the permanent worship facility with seating for 2,000 people).

The City has the following comments, which are noted below:

- 1. Page 9-40, Mitigation Measure 9-2, Significance After Mitigation, third sentence – “The additional northbound through lane, and associated widening of Sierra College Boulevard at the Nightwatch Drive intersection as described in mitigation measure 9-2, would mitigate the effects of the proposed Project at the intersection of Sierra College Boulevard and Nightwatch Drive.” – Mitigation measure 9-2 calls out the addition of a second northbound through lane, but there is no discussion of the associated widening of Sierra College Boulevard at the Nightwatch Drive intersection as implied by the Significance After Mitigation discussion – If there are specific improvements to the intersection beyond widening that would be required, the mitigation measure should identify such. **8-1**
- 2. Page 9-42, Background Improvements – the discussion of anticipated improvements where Sierra College Boulevard would be widened to provide two through lanes in each direction from the El Don Drive intersection north to Interstate 80 should be updated to acknowledge that these improvements have now been completed. **8-2**
- 3. Page 9-54, Impact 9.5 (Impacts to Intersection of Sierra College Boulevard/Nightwatch Drive) – the impact discussion acknowledges that under the Existing Plus Approved Projects (EPAP) scenario, this intersection would operate at LOS D with Phase 1 of the proposed project, and that would exceed the City of Rocklin’s minimum LOS C threshold and would be a significant impact. Mitigation Measure 9.5 refers back to mitigation measure 9-2, which calls out the **8-3**

**Information 916.625.5000**

Administrative Services 916.625.5000 • City Hall 916.625.5560 • Community Development 916.625.5100  
Community Services & Facilities 916.625.5200 • Fire 916.625.5300 • Police 916.625.5400 • Public Works 916.625.5500

## Letter 8 Continued

addition of a second northbound through lane on Sierra College Boulevard, but the timing of the mitigation measure is prior to the issuance of any building permits for Phase II, so such a mitigation measure does not address the identified impact. If the intersection is going to degrade to LOS D with the addition of Phase 1 under the existing plus approved projects scenario, then the addition of a second northbound through lane to Sierra College Boulevard should occur with the development of Phase 1, not with the development of Phase II. The City requested that the project's traffic analysis include an existing plus approved projects scenario because the City believes that such a scenario is a more realistic look at the conditions that could be expected at the time that the proposed project is constructed, and as such, the City's traffic studies and associated environmental documents identify mitigation requirements through the existing plus approved projects plus project scenario and not the existing plus project scenario. Furthermore, it is important to note that many of the projects that were included on the approved projects list provided by the City of Rocklin are in fact now built and occupied, with the expectation that other projects on the list will also be built and occupied prior to the Amazing Facts project being built. For these reasons, the timing of adding a second northbound through lane to Sierra College Boulevard should occur with Phase 1 of the project.

**8-3  
cont.**

4. Page 18-16, Section 18.8.5 Cumulative Year 2025 Plus Project Impacts, second paragraph, second bullet – "Add a third through lane and a separate right turn lane on the southbound Sierra College Boulevard approach for a total of five lanes. The third through lane is included in the SPRTA fee program. The southbound right turn lane is identified as mitigation measure 9-3." - Per the discussion under "Future Improvements" on page 18-12, "...in the area of the project the SPRTA program specifically excludes the third lane in each direction and instead suggests that this work will be the responsibility of the local jurisdiction and fronting developers.", thus the second sentence at the second bullet (The third through lane is included in the SPRTA fee program) is not an accurate statement and the sentence should be removed.

**8-4**

Thanks again for the opportunity to comment. If there are any questions, please do not hesitate to contact David Mohlenbrok, Senior Planner, at (916) 625-5160.

Sincerely,



Sherri Abbas

Community Development Director

cc: David Palmer, Acting City Engineer  
David Mohlenbrok, Senior Planner  
City Manager  
City Councilmembers

## LETTER 8: SHERRI ABBAS, CITY OF ROCKLIN

### RESPONSE TO COMMENT 8-1

The Draft EIR identifies Project improvements that would be made to its frontage along Sierra College Boulevard and the intersection of Sierra College Boulevard and Nightwatch Drive. Draft EIR pages 9-24 and 9-25 specifically note:

Improvements to the Sierra College Boulevard/Nightwatch Drive intersection have been assumed under these initial analysis conditions. Improvements will be made to Sierra College Boulevard west of the intersection to create a right turn lane into the site at Nightwatch Drive. The median on Sierra College Boulevard has been assumed to be reconstructed to create a single left turn lane into the Project site. A two lane northbound Nightwatch Drive approach has been assumed, with these two lanes configured as a dedicated left turn lane and a combined left+through+right turn lane. The existing southbound right turn lane on Nightwatch Drive has been assumed to be restriped to permit through traffic. The Project's frontage widening has been assumed to be striped to accommodate a separate right turn lane into the site at the new access on Sierra College Boulevard.

In order to further address Project traffic impacts to Sierra College Boulevard, the Project applicant has proposed (as part of the Project) to re-stripe a portion of Sierra College Boulevard from Nightwatch Drive to El Don Avenue (see **Figure 1-4**). This re-striping would result in a complete four-lane Sierra College Boulevard from City of Roseville city limits to Interstate 80 (I-80). This re-striping was reviewed by KD Anderson & Associates regarding potential changes in traffic impacts identified in the Draft EIR. This analysis is provided in **Appendix A**. As shown in this analysis, the proposed re-striping would provide for improved intersection operations with Project conditions for "Existing Plus Approved Projects Conditions" (see Draft EIR pages 9-40 through -56 for a description of "Existing Plus Approved Projects Conditions") and "Cumulative Conditions" (see Draft EIR pages 18-7 through -18 for "Cumulative Conditions") for Sierra College Boulevard intersections at Southside Ranch Road, Ridge Park Drive (westbound movement), and Nightwatch Drive as noted below:

#### *Existing Plus Approved Projects Conditions for Saturday Peak Hour*

- Sierra College Boulevard/Nightwatch Drive (from LOS E to LOS C)
- Sierra College Boulevard/Ridge Park Drive (maintains LOS A for overall intersection operations but improves the westbound right- and left-turn movement delay by 4.3 seconds)
- Sierra College Boulevard/Southside Ranch Road (from LOS D to LOS A)
- Sierra College Boulevard/El Don Drive (maintains LOS A conditions).

#### *Cumulative Plus Project Conditions for Saturday Peak Hour*

- Sierra College Boulevard/Nightwatch Drive (from LOS F to LOS C/D)
- Sierra College Boulevard/Ridge Park Drive (maintains LOS A for overall intersection operations but improves the westbound right- and left-turn movement delay by 4.3 seconds)
- Sierra College Boulevard/Southside Ranch Road (from LOS F to LOS A)
- Sierra College Boulevard/El Don Drive (from LOS A to LOS A/B).

Specifically, this improvement would eliminate significant and unavoidable impacts identified in the Draft EIR for the following intersections: Sierra College Boulevard/Southside Ranch Road (Impact 9.4 and cumulative plus Project impact) and Sierra College Boulevard/Nightwatch Drive (Impact 9.5).

### RESPONSE TO COMMENT 8-2

The following correction is made to the Draft EIR on page 9-42:

#### Background Improvements

Various circulation system improvements may be expected to be completed under the short-term horizon. ~~Recently~~~~In the near term~~, Sierra College Boulevard ~~was is to be~~ widened by the City of Rocklin to provide two through lanes in each direction from the El Don Drive intersection north to Interstate 80. This work ~~will~~ creates two complete northbound through lanes at the Sierra College Boulevard/El Don Drive intersection. However, at the Rocklin Road/Sierra College Boulevard intersection, no additional turn lanes will be developed as part of this Project. Under the base condition, no improvements have been assumed at the Sierra College Boulevard/Rocklin Road intersection.

### RESPONSE TO COMMENT 8-3

The following change is made to Draft EIR mitigation measure 9-2 on page 9-40:

#### Mitigation Measure 9-2 Sierra College Boulevard/Nightwatch Drive Intersection Mitigation

Prior to the issuance of any building permits for Phase ~~II~~, construct the following improvements at the intersection at Sierra College Boulevard and Nightwatch Drive.

- Add a second northbound through lane

As noted in Response to Comment 8-1, the Project applicant has proposed (as part of the Project) to re-stripe a portion of Sierra College Boulevard from Nightwatch Drive to El Don Avenue (see **Figure 1-4**). This re-striping would result in a complete four-lane Sierra College Boulevard from City of Roseville city limits to Interstate 80 (I-80).

### RESPONSE TO COMMENT 8-4

The following change is made to the second bullet on page 18-16:

- Add a third through lane and a separate right turn lane on the southbound Sierra College Boulevard approach for a total of five lanes. ~~The third through lane is included in the SPRTA fee program.~~ The southbound right turn lane is identified as mitigation measure **9-3**.

## Letter 9



PLACER COUNTY  
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

---

Ken Grehm, Executive Director  
Brian Keating, District Engineer  
Andrew Darrow, Development Coordinator

October 17, 2011

Maywan Krach  
Placer County  
Community Development Resource Agency  
3091 County Center Drive  
Auburn, CA 95603

**RE: Amazing Facts Ministries / PEIR 20080021, Draft EIR**

Maywan:

We have reviewed the Draft EIR dated September 2011 for the subject project and have the following comments.

Mitigation measure 13-5f states that an assessment of the structural integrity of the project site's dam will be performed. The District requests that a copy of this assessment be provided for our review when it becomes available. Both the District and the City of Roseville have concerns regarding the integrity of the dam and the potential downstream impacts due to a dam failure.

9-1

Please call me at (530) 745-7541 if you have any questions regarding these comments.

A handwritten signature in blue ink, appearing to read "Andrew Darrow".

Andrew Darrow, P.E., CFM  
Development Coordinator

t:\ecsteira\amazing facts ministries\deir\public comment\comment\_fcd.docx

---

3091 County Center Drive, Suite 220 / Auburn, CA 95603 / Tel: (530) 745-7541 / Fax: (530) 745-3531

LETTER 9: ANDREW DARROW, PLACER COUNTY FLOOD CONTROL  
AND WATER CONSERVATION DISTRICT

**RESPONSE TO COMMENT 9-1**

The following changes are made to Draft EIR mitigation measure 13-5f on page 13-34:

**Mitigation Measure 13-5f Improve or Rebuild Dam to Increase Detention Capacity**

The applicant shall retain a qualified engineer to assess the structural integrity of the dam on the Project site based on all applicable state and local standards and will be submitted to the Placer County Flood Control and Water Conservation District for review and approval prior to approval of improvement plans. Based on the results of this assessment, one of the following courses shall be taken:

- 1) If the dam is found to have the required integrity, including a non-seeping core, a new spillway shall be constructed with a lower spill elevation to increase the available detention volume. A lower spill elevation would lower the pond's normal water surface by 1.8 feet. This could cause a loss of wetland habitat. In order for these improvements to be implemented, the pond would be partially drained and there would be disturbance to the spillway area during construction. The U.S. Army Corps of Engineers Section 404 permit for the Project (required under mitigation measure **6-6**) shall address this potential loss of wetlands at the spillway and pond perimeter.
- 2) If the dam is found not to have the required integrity, it shall be rebuilt to meet all structural requirements. The new dam shall be constructed at an elevation 1.8 feet higher than the existing dam's elevation, and the associated spillway shall be constructed at the existing spillway's elevation. This would result in the pond's water surface remaining the same but the footprint of the dam would increase, resulting in a loss of wetland habitat at the spillway. In order for these improvements to be implemented, the pond would be completely drained and there would be disturbance to the pond during construction. The dam slope shall be planted with grass of like kind to the existing site vegetation. Any trees removed shall be replanted with like kind in a compatible location. The U.S. Army Corps of Engineers Section 404 permit for the Project (required under mitigation measure **6-6**) shall address the potential loss of wetland habitat at the spillway.

## Letter 10



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

October 18, 2011

Maywan Krach  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

Subject: Amazing Facts Ministry  
SCH#: 2009022009

Dear Maywan Krach:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 17, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

  
Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

10-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

## Letter 10 Continued

### Document Details Report State Clearinghouse Data Base

**SCH#** 2009022009  
**Project Title** Amazing Facts Ministry  
**Lead Agency** Placer County

**Type** EIR Draft EIR

**Description** The proposed project includes construction of a 17-acre campus to support a new Amazing Facts Ministries facility on a 74.2-acre site. Phase I would include the construction of an approximately 106,800 s.f. multi-use worship facility and an 11,220 s.f. resource center building. Phase II would include a 90,000 s.f. detached facility. The Project proposes approximately 625 on-site parking spaces as part of Phase I and an additional 275 parking spaces as part of Phase II for a total of approximately 900 spaces.

#### Lead Agency Contact

**Name** Maywan Krach  
**Agency** Placer County Community Development Resource Agency  
**Phone** 530 745 3132 **Fax**  
**email**  
**Address** 3091 County Center Drive, Suite 190  
**City** Auburn **State** CA **Zip** 95603

#### Project Location

**County** Placer  
**City** Rocklin  
**Region**  
**Lat / Long** 38° 46' 22.85" N / 121° 12' 35.62" W  
**Cross Streets** Sierra College Boulevard/Nightwatch Drive  
**Parcel No.** 046-050-006&046-050-008  
**Township** **Range** **Section** **Base**

#### Proximity to:

**Highways** I-80, SR-65  
**Airports** No  
**Railways** UPRR  
**Waterways** Secret Ravine Creek  
**Schools** Sierra Elementary  
**Land Use** multiple land use designations

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 2; Department of Parks and Recreation; Central Valley Flood Protection Board; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 3; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

**Date Received** 09/02/2011 **Start of Review** 09/02/2011 **End of Review** 10/17/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER 10: SCOTT MORGAN, GOVERNOR'S OFFICE OF PLANNING  
AND RESEARCH, STATE CLEARINGHOUSE AND PLANNING UNIT

**RESPONSE TO COMMENT 10-1**

Comment letters received from the State Clearinghouse are responded to in this Final EIR.

## Letter 11

To: County of Placer Planning Commission  
**In-Care-of:** Maywan Krach, Environmental Coordination Services  
 Placer County Community Developments Resource Agency  
 3091 County Drive, Suite 190  
 Auburn, CA 95603

Re: Public Comment – Amazing Facts Ministry Application (PEIR 20080021)

As a resident of County of Placer, my objection to the Amazing Facts Project does not rest with the issue associated with having a” house of worship” located on the property in question. Instead, it rests in the size of the project and the commercial / manufacturing nature of the related uses proposed.

11-1

### HISTORICAL ZONING PERSPECTIVE

I think that land use projects being considered for religious purposes should not be considered without first understanding the historical background that led to the intent of considering “houses of worship” in most zones, including residential zones. Up until around the 1930’s locations for traditional houses of worship were not really an issue in the United States, as they were located in surrounding neighborhoods and communities with residents of similar religious beliefs. As U.S. cities initiated zoning, houses of “worship” were allowed in residential zones due to the fact that many households walked to “worship” services, and it wasn’t considered disruptive to have a “house of worship” in a residential district. A typical house of “worship”, regardless of religion, was just that, a place for a congregation to meet, pray as a group, and seek spiritual guidance. However, as populations became more mobile, and the social dynamic of America changed, jurisdictions recognized the need for special use permits to obtain permission to build, or add to a “house of worship” in an effort to protect community residents from the negative issues associated with an ever expanding use, once known specifically as a place to “worship”. Some of the negative issues realized by community leaders included:

11-2

1. Most attendees arrived by automobile, so traffic and parking became an impact to the surrounding neighborhood.
2. Neighborhoods were becoming more religiously diverse, so in a typical community, more houses of worship were infilling neighborhoods and they began holding services at many different times during the week. As a result the traffic situation was not isolated to a couple of hours per week.

## Letter 11 Continued

3. Congregations began taking on more and more roles. Many started housing day care centers, parents day out programs, senior citizen activities, youth recreation, social services, and many other activities at all times of the day and week. And, almost everyone came and went by automobile.

11-2  
cont.

As a result of these change it is easy to say that the “worship” part of a house of worship, as typically constructed today, is overshadowed by many other uses that are typically be directed to other land use zones better defined to deal with the scale and intensity of uses now proposed by many mega church institutions.

### SPECIFIC PROJECT OBJECTIONS

#### *Exploiting Definitions*

As defined by most dictionaries, “worship”, when used in religious terms, is:

- reverence offered a divine being or supernatural power
- an act of expressing such reverence
- a form of religious practice with its creed and ritual

As defined by Placer County’s Zoning Code (17.04.030 Definitions of land uses, specialized terms and phrases) “Houses of worship” (*land use*) means *religious organization facilities operated for worship or promotion of religious activities*, including churches, synagogues, temples, etc., and also includes *religious accessory uses* on the same site, including but not limited to living quarters for staff, and child day care facilities where authorized by the same type of land use permit required for the house of worship itself. *Other establishments maintained by religious organizations*, such as full-time educational institutions, hospitals and other potentially related operations (such as a recreational camp) *are classified according to their respective activities*.

11-3

This definition unfortunately could allow for much interpretation. However, I would ask that County officials utilize common sense when considering approval for a project of this scope /intensity (208,020 sf on 17-net acres) on land primarily intended for residential use per the General Plan / Granite Bay Community Plan, and for agricultural / residential with low population densities in the Farm Zone. In fact, except for a relatively small (50,200 sf) professional office corner (approved as a part of a larger master plan in the City of Rocklin), the

## Letter 11 Continued

surrounding land utilization is exclusively residential measured in sub-urban terms or rural residential densities. It should be noted that size of the development intensities and the non-worship uses proposed by the Amazing Facts project are traditionally located in commercial, office, and industrial zones throughout the County of Placer.

I believe this intensity of use should be an important consideration in locating a large scale project surrounded by residential uses, and if the County official simply removes the word “worship” from the equation, you would be hard pressed to allow the other 118,020 sf of proposed uses for this site without requiring a General Plan Amendment and Zoning Change.

According to the applicants proposal these other than “worship” uses include:

- Producing television, radio, and internet programs
- Broadcasting television programs
- Publishing ministry materials for sale and distribution
- Operating a school of evangelism
- Operating a “multi-use” facility (separate from the “worship” area) for undisclosed activities (totaling 106,800 sf)
- Conducting world wide ministry business from on-site offices.

I believe the applicant is exploiting the idea of a “house of worship” and I ask the County to explain why/how these additional uses fit in the definition of “worship” and not a commercial enterprise (be it for profit or not)!

### ***Questionable Project Objectives***

As identified in the DEIR and by the applicant, some of the proposed Project objectives include:

- Develop the Amazing Facts house of worship facility and offices to accommodate the multifaceted ministry that supports their local and worldwide mission – *This facility will be **much more** than just a place to congregate for worship.*
- Develop a house of worship facility to serve the surrounding community – *exactly what “surrounding community” is the applicant talking about? The immediate surrounding neighborhoods? The county? The region? According to the applicant’s own records the majority of the current members reside many miles away from the site, and the expected congregation growth is to be from a regional perspective. Is this the County’s intended definition of “serving the surrounding community”?*

**11-3  
cont.**

**11-4**

## Letter 11 Continued

- Attain the goal of eventually building a 2,000-seat facility with supporting ministry space – *This does not sound like a facility to serve the “surrounding” community.*
- Provide phasing of the Project that will address the possibility of future growth in the congregation. And, build and provide a worship facility that will accommodate the long-term growth and ultimate congregation size – *How is the ultimate congregation size determined? What is the metric used to predict this growth.*

11-4  
cont.

### ***Adequate Access and Parking Questioned***

As noted by the applicant’s proposed ultimate size (208,020 sf total floor space on 17-net acres; a 2,000 seat worship area, 900 parking spaces, and 97 employees) this is not a small facility and greatly exceeds the size of other church centers in the immediate area. By comparison, the **Bayside Church Facility** (considered a mega church by many), located approximately two miles to the south on Sierra College Boulevard, is a **45% smaller facility** - 94,500 sf on approximately 22-acres of developed net property, versus the Amazing Facts proposal of 208,020 sf on 17-acres of developable net property. Other comparative access and parking issues include:

- The smaller Bayside Church has better access: Bayside is accessed from Sierra College Boulevard via one signalized intersection (Olympus Drive) at a major collector road, and from two other full access intersections north and south (Cavitt Stallman Road) of Olympus Drive (with the northern intersection to be signalized in the future). *The Amazing Facts project will have one signalized access (associated with Nightwatch Drive, a minor collector into a residential subdivision) and one right-in, right-out only access on to Sierra College Boulevard.*
- Bayside is also accessed from Cavitt Stallman Road (with a direct connection of Cavitt Stallman Road to Douglas Boulevard by / through a commercial and office area. *The much larger Amazing Facts facility relies on only two entry points directly on Sierra College.*
- The smaller Bayside has a parking problem: Even though Bayside has a large parking facility of approximately 875-spaces for 94,500 sf of total approved facility, off-site parking is utilized (arranged at various nearby parking lots) and private buses are used to shuttle members to and from the facility during services and events. *The Amazing Facts project proposes only 25 more spaces, at 900 parking spaces, for an additional 113,520 sf of facility. How does this make sense?*

11-5

## Letter 11 Continued

- Bayside utilizes a dedicated internal circulation road that channels traffic to three full-access entry/egress points. The Amazing Facts project utilizes a short dedicated onsite access road with most of the queuing stacked in the parking lot.
- Bayside hosts many high volume traffic events that are not reserved for a “typical” worship day/week scenario, or during “typical” special holiday periods. The Amazing Facts traffic study uses this idea of a “typical” worship day/week traffic as the metric to measure traffic impacts. Obviously, Bayside is an example of not adhering to this metric, and it is reasonable to assume Amazing Facts will not either. Without this consideration, how can the traffic impact study be considered complete?
- In order to help with traffic circulation during most services and large events, Bayside utilizes many people to direct traffic and resolve queuing issues. Will Amazing Facts utilize a similar approach given that there facility has the opportunity to attract more people per potential event? Is this an acceptable mitigation to be allowed by the County? How would the County enforce this issue?

11-5  
cont.

### **Specific DEIR Comments / Concerns**

The following list identifies issues, terms or assumptions made by the EIR preparer that I feel have not been clearly vetted or explained.

- **Significant Impacts Not Balanced:** The DEIR identifies that four of the environmental impacts studied (traffic and circulation, cumulative air quality, climate change, and visual resources) are significant in impact and can not be reduced to less than significant. It is obvious that the intensity of this project as proposed is not what was intended when the land use and zoning for this property was approved as a part of the General Plan, Community Plan, and Zoning Map. We are aware that the General Plan and CEQA process' takes great pains to balance the intensity of uses against the cumulative environmental impacts. So why should it make a difference to allow such an intense use, just because it is loosely defined as a house of worship?

11-6

To use an analogy, let's call the resulting General Plan an environmental budget that has been established by the County to rationally spend a limited amount environmental dollars. Therefore, if the County allows these significant impacts to the environment at this location, does that mean the County will “cut” some other land use of similar intensity in a zone allowed for more intensity? If not, would not this be a basic violation of consistency with the General Plan?

## Letter 11 Continued

- **Unclear Use Terminology:** The term multi-use facility is not clearly defined and the worst case impact of this use on the daily life of the surrounding community is not addressed in the EIR. **11-7**
- **Commercial Use Conflict:** The proposed 11,200 sf resource center is not well defined, but appears to be a media production center/offices for the distribution of for-sale items associated with the business of the ministry. Why is a non-agricultural commercial business allowed in a zone limited to only agricultural type businesses associated with the production of the land? **11-8**
- **Conflict with “Intensity of Land Use Policy” The Granite Bay Community Plan:** The Community Plan recognizes that project area should be a “transition zone” between the urban (sub-urban) densities in Roseville, and the rural character existing south and east of Sierra College Boulevard. Currently, the land use surrounding the project in the County is Rural Estate 4.6-20 acre minimum, with the land immediately to the west being developed as large lot estates (1-unit per 5-acres). However, the DEIR would have you believe a traffic intensive, 208,020 sf business / worship facility, with significant and unavoidable cumulative environmental impacts, is an appropriate transition use that is consistent with the intent of the Community Plan. How is that consistent or rational? **11-9**
- **General Plan Consistency Conflict:** On page 4-21, the Analysis associated with Policy 1.A.5 notes that the project is consistent because it is “zoned for urban development”. This is not true. In fact, in the continuing analysis under Policies 1.H.2 and 1.H.4, it is noted that the project is zoned for agricultural uses. Furthermore, a discussion in the analysis in Policy 1.H.2 notes that the project is not “major commercial” or expected to encourage expansion of urban uses to the surrounding areas. As noted previously, the commercial business of the ministry is expected to be generated from this project of 208,020 sf of floor space. If this is allowed, what is to stop others from using this project as a precedent and making similar arguments to allow commercial type intensive development on surrounding properties of land? **11-10**
- **Community Plan Consistency - Questionable Analysis:** On page 4-23, Policy 2 discusses the intent of proposed land uses in the Community Plan area. The EIR analysis states the project is consistent with this policy because it would serve the on-going needs of the surrounding community. Yet this project is clearly intended by its ultimate size to serve regional needs more than the needs of the immediate surrounding community. **11-11**
- **Community Plan Consistency - Questionable Analysis:** On page 4-24, Intensity of Use Policy 1 discusses the intent of proposed land use in this area is to have low intensity **11-12**

## Letter 11 Continued

development appropriate to the densities/intensity of the adjacent Granite Bay community. The analysis makes the argument that the development is consistent because it is low intensity (on the 72-acre gross property – the rest is not cost efficient to develop due to slope conditions). However, the area of actual development of 208,020 sf on 17-acres is actually high intensity (**a 28% FAR, higher than many commercial strip centers**). Conversely, the analysis makes the argument that the 50,200 sf office development (comparatively low traffic impact, no use at night, little to no use on weekends) is “intensive development”, and therefore the Project is justified as a transitional use. **Does the County really believe this is a fair comparison?** I believe this conclusion is wrong and the project is not a transitional use as intended in the Granite Bay Community Plan.

11-12  
cont.

- **Community Plan Consistency - Questionable Analysis:** On page 4-24, Public and Private Institution Policies, Policy 1 discusses that “the uses shall be limited to those which provide non-commercial services or facilities for local residents and contribute to the well being of the community”. The analysis finds the project consistent with this policy because it provides non-commercial services (*even though **Amazing Facts will be producing for sale production materials and operating business offices***), available to local residents, and contribute to the well being of the community (*How exactly? **How do creating four significant impacts to the environment with direct detrimental effects on the surrounding community contribute to the well being of the community?***) I believe this analysis is wrong and the project is not consistent with the Community Plan policy.
- **Community Plan Consistency - Questionable Analysis:** On page 4-24 and 4-25, Public and Private Institution Policies, Policies 2 and 3 discusses that the use shall be limited to that which is compatible with adjoining land uses and in keeping with the rural character of Granite Bay; the institution should not generate excessive noise or traffic. The analysis finds the Project consistent **only because** it is a “house of worship”. If “only” that were the case this might be true. But, as evident by the other planned uses on the site, the project will be much more, will generate far more traffic than the underlying zone ever intended, and is hardly keeping with the rural character just because the 208,020 sf of structures will be relatively low in appearance and neutral in color. **Exactly how does one justify 900 parking spaces in one area as keeping with the rural character of Granite Bay in the middle of a rural estate area?** I believe this analysis is wrong and the project is not consistent with the Community Plan policy.

11-13

11-14

## Letter 11 Continued

- **Water Supply / Pressure Impacts:** During the summer months PCWA currently can only provide the bear minimum water pressure (approximately 28-psi) in our area because of on-going water delivery issues. In fact, it is our understanding (from PCWA) that the water to our area comes from an agreement with Roseville until an undisclosed time in the future. This issue does not appear to be addressed other than the standard “applicant entering into an agreement with PCWA...” language. I believe that the water delivery / water pressure issue be thoroughly vetted with PCWA and a clear mitigation provided that would not impact surrounding residents (if needed). **11-15**
- **Proposed Traffic Conditions – Analysis is Limited in Scope:** The traffic study assumes that the major traffic issues will occur ONLY on Saturdays during a peak hour and does not discuss the potential for large regular events that would draw from s regional context. Bayside Church (just down the road) is a prime example of a “church” hosting many large scale events on a fairly regular basis, not just during the typical Sunday service window. With the Amazing Facts project proposing a 106,800 sf “Multi-use facility” (on top of a 2000 seat worship facility) it is fair to assume that they do not plan to just host the occasional pot luck. It should also be noted that the ITE definition of house of worship does not account for all of the types of facilities this project is proposing. Given these issues I believe it is appropriate for the EIR to consider the type of events held at Bayside, their impacts on local / regional traffic, and the air quality issues that will be impacted on more than just during “Saturday service”. **11-16**
- **Traffic Impacts Significant Even After Mitigation:** As noted in the EIR there are many improvements needed that require the cooperation of the City of Rocklin. However, there is no guarantee of when or if the City will act on these improvements even when provided a fair share fee instead of constructing improvements. I believe the issue of making all necessary roadway improvements needs to be resolved before any final project approval, either through written agreements with the City of Rocklin or project conditions requiring the applicant to make all necessary traffic improvements before the project opens for business. **11-17**

### CONCLUSION

The narrative in the DEIR continually stresses that the Project is a house of “worship” as the main justification for consistency, in many instances going out of the way to point out that the zoning district allows for houses of worship, or “churches”. As noted throughout this letter, the project is **11-18**

## Letter 11 Continued

intended to be much more than a church and continually calling it so appears as an attempt to deflect from the fact that the Project is a very large institutional / commercial complex, with significant unavoidable environmental impacts better suited in an area associated with commercial, office, or industrial uses.

It is my contention that the County officials (the Planning Commission and Board of Supervisors) should reject this proposal based on its size/intensity not being compatible with the intent of the Grant Bay Community Plan, General Plan Land Use Policies, the generation of unavoidable significant environmental impacts, and the fact that the project is more than just a place to worship.

**I respectfully ask that you apply the same rationale to this project as you would to a similar sized commercial or office project that would not include worship in its use.** Regardless of its religious affiliation, I believe the scale and scope of the project should be a driving force in determining if the project is best suited for one zone or another, not just because it is religiously affiliated. As the earlier historic perspective illustrated, churches use to be much smaller, typically served the immediate neighborhood around the church, provided limited social services, and did not produce commercially marketable materials from “the house of worship”. However, with the advent of a mobile population and the advancement of communication technologies, “churches” have stepped out beyond their traditional bounds to be places of worship, recreation / community centers, schools and have begun operating like businesses. As times changed, zoning laws have left many grey areas that can only be addressed by those with the ability to make change: constituents and public officials.

Toward that end, I respectfully ask that the Planning Commission:

1. Recommend disapproval of the project as proposed, or,
2. Request/recommend major changes, including the elimination of media production / distribution capabilities, and reduction of the total project intensity to less than 60,000 sf of building (compatible with the adjacent office project across the street) before sending this project on to the Board of Supervisors for their review.

Respectfully yours,

Scott Robertson, Placer County Resident, 6320 Galaxy Lane, Rocklin, CA 95677



uawildcats2@comcast.net

**11-18  
cont.**

## LETTER 11: SCOTT ROBERTSON

### **RESPONSE TO COMMENT 11-1**

Comments associated with the size and operation of the proposed Project is noted; however, there is no “manufacturing” proposed with the Project. The Draft EIR provides a detailed description of the Project as well as an analysis of the physical environmental effects of constructing and operating the Project as proposed. The “commercial” aspects of the Project’s operations are considered “promotion of religious activities” and are included under the “House of Worship” definition pursuant to Zoning Ordinance Sec. 17.04.030.

### **RESPONSE TO COMMENT 11-2**

Comments associated with the zoning and evolution of the function of houses of worship is noted. The Draft EIR provides a detailed analysis of the physical environmental effects of constructing and operating the Project as proposed, including consideration of traffic impacts.

### **RESPONSE TO COMMENT 11-3**

Comments expressing concern regarding the appropriateness and compatibility of the proposed Project at the site are noted. Land use conditions and potential land use impacts are addressed in Chapter 4.0 (Land Use and Agriculture) of the Draft EIR (see Draft EIR pages 4-27 and -28). The activities listed are allowed uses pursuant to Zoning Ordinance Sec. 17.04.030.

### **RESPONSE TO COMMENT 11-4**

The Project objectives were identified by the applicant for use in the Draft EIR. It is important to note that Amazing Facts currently provides worship services for its members in nearby Loomis (at the existing Shepherd of the Sierra church), which includes residents from the Granite Bay area. Initial members originally met near the Project site at the Sierra Elementary School on Scarborough Drive, Due to the growth of their membership, they moved to a larger facility and have already reached capacity at Shepherd of the Sierra. Many houses of worship offer services intended to assist people locally as well as worldwide. In addition, Amazing Facts currently operates from offices located in Placer County’s Sunset Industrial Area west of the City of Rocklin and north of the City of Roseville.

### **RESPONSE TO COMMENT 11-5**

It is acknowledged that roadway facilities and available access of the Project site is limited to Sierra College Boulevard. However, there are substantial differences between the Project and Bayside Church which reflect how each church uses its square footage. The number of parking spaces required is a result of the County’s standards and is based upon the amount of square feet allocated to each specific use. The Seventh-Day Adventist faith and practices are different from Bayside’s and as a result the Project will not have as many ancillary activities. The Draft EIR traffic analysis evaluates the traffic operational impacts of the Project’s access configuration, including during the typical peak traffic conditions during services on Saturdays (see Draft EIR Table 9-11 on page 9-42). Additional traffic analysis was completed in 2010 with a more complete list of activities and mitigation is identified to address the Project’s traffic impacts.

Regarding parking, the proposed Project design exceeds parking standards required under Sections 17.54.050 and 17.54.060 of the Placer County Code (see Draft EIR page 9-55). The

comment provides no technical analysis that meeting County parking standards would not provide adequate parking for Project operations.

It is acknowledged that the proposed Project will host a variety of activities on days and evenings other than Saturday, in addition to special events during the holidays. However, activities during the weekdays have been included in the traffic analysis and commonly occur outside of the peak hour traffic conditions, and are not the basis on which the County designs its roadway facilities. Designing roadway facilities to accommodate special-event traffic would result in larger roadways and intersections that could result in further physical impacts to the environment.

While Bayside Church and other large houses of worship in the area (e.g., Adventure Church in the City of Roseville) provide traffic control staff to ensure efficient movement of traffic during special events, it is not anticipated that the Project would require such staffing. However, if any special event were to be of a magnitude where such traffic would be expected, the Project would provide or hire traffic control staff.

### **RESPONSE TO COMMENT 11-6**

As identified in CEQA Guidelines Section 15121, an EIR is an informational document to inform the public and decision-makers of the significant environmental effect of a project and must be considered prior to taking action on a project. If the County ultimately decides to approve the proposed Project, it will be required to balance the benefits of the Project against the unavoidable adverse environmental effects of the Project and determine that the benefits outweigh the environmental effects (see CEQA Guidelines Section 15093).

The commenter is referred to the General Plan consistency analysis provided in Chapter 4.0 (Land Use and Agriculture) of the Draft EIR. The Project was determined to be consistent with the General Plan.

### **RESPONSE TO COMMENT 11-7**

Chapter 3.0 (Project Description) provides a complete description of all proposed facilities and operations on the site that is the basis of the impact analysis in the Draft EIR. The commenter provides no information as to how the multiple uses of the proposed Project are not addressed in the Draft EIR.

### **RESPONSE TO COMMENT 11-8**

A detailed description of the 11,220-square-foot resource building is provided on Draft EIR page 3-13. Operations in this building are supportive activities of the Project's operation as a "house of worship" and are not a separate commercial use, but are considered "promotion of religious activities" and allowed pursuant to Zoning Ordinance Section 17.04.030.

### **RESPONSE TO COMMENT 11-9**

The discussion on Draft EIR page 4-5 provided below specifically identifies that the Project is consistent with this provision of the Granite Bay Community Plan that has resulted in the transitional urban uses including other large houses of worship (e.g., Bayside Church), which also had significant and unavoidable cumulative environmental impacts.

While the Project site is designated RE, the Granite Bay Community Plan recognizes the urban uses in the adjoining areas of the City of Roseville, City of Rocklin, and Sacramento County, and the Community Plan provides for an area transitioning from urban uses to rural uses under “Intensity of Use Policies – Policy 1” that specifically notes:

*The planning area shall have the low intensity of development which is appropriate to its location on the fringe of the urban areas of the City of Roseville and the County of Sacramento, and should provide a transition between the urban densities in the adjoining communities and non-intensive land uses to the north and west. [underscore added for emphasis]*

In part due to implementation of this policy, development along the eastern side of the Sierra College Boulevard corridor (from Old Auburn Road to Rocklin Road) consists of more urban uses and densities which generally transition to more rural uses further east of the Sierra College Boulevard corridor (see **Figure 3-2**).

The site is zoned by Placer County as Farm with a Building Site combining district (F-B-X 20-acre minimum) (see **Figure 4-3**). The intent of the Farm (F) zone is to provide areas for the conduct of commercial agricultural operations that can also accommodate necessary services to support agricultural uses, together with residential land uses at low population densities. Allowable uses within this zone include crop production, equestrian facilities, fisheries and game preserves, forestry, grazing, storage structures, and pipelines and transmission lines. Houses of worship, or churches, are also allowable uses with issuance of a minor use permit (Placer County, 2009a).

As described in Chapter 1 (Introduction), the Granite Bay Community Plan has been updated since release of the Draft EIR. Based on review of the policies of the adopted Granite Bay Community Plan to the consistency analysis provided in Draft EIR Tables 4-7, 8-2, 9-6, 10-6, 11-7, 12-2, 13-2, 14.1-2, 14.2-2, 14.4-4, 14.5-2, 14.7-7, and 15-3, the proposed Project would be generally consistent with the updated Granite Bay Community Plan as identified in these tables.

### **RESPONSE TO COMMENT 11-10**

The analysis for General Plan Policy 1.A.5 has been modified below to correct this statement. The proposed Project is a house of worship and not a commercial use and would not set a precedent of allowing commercial uses on adjoining land areas.

On Draft EIR page 4-21, the following text modifications are made for the analysis of Policy 1.A.5:

The proposed Project does not include the subdivision of any parcels. Furthermore, houses of worship are considered an allowed use within the F-B-X zoning district with a minor use permit ~~the Project site is zoned for urban development.~~

### **RESPONSE TO COMMENT 11-11**

Amazing Facts currently leases a church in Loomis to provide an interim facility providing Saturday worship services for its members in western Placer County, including those who reside in the Granite Bay. It is anticipated that its Granite Bay membership will increase with the construction of the proposed Project. Their business offices are currently located in the Sunset Industrial Area, west of the City of Rocklin and north of the City of Roseville.

As described in Chapter 1 (Introduction), the Granite Bay Community Plan has been updated since release of the Draft EIR. Based on review of the policies of the adopted Granite Bay Community Plan to the consistency analysis provided in Draft EIR Table 4-7, the proposed Project would be generally consistent with the updated Granite Bay Community Plan as identified in this table.

### **RESPONSE TO COMMENT 11-12**

While it is acknowledged that the Project's FAR in the proposed development area of the site would be 28 percent, the Project's FAR for the entire 74.2-acre site would be 6 percent. It should be noted that the Farm zone allows for several uses that could be of similar intensity of site development including electrical generating plants, community centers, colleges and universities, and hospitals (see Zoning Ordinance Section 17.10.010). The commenter is referred to Response to Comment 11-9 regarding Intensity of Use Policies – Policy 1.

As described in Chapter 1 (Introduction), the Granite Bay Community Plan has been updated since release of the Draft EIR. Based on review of the policies of the adopted Granite Bay Community Plan to the consistency analysis provided in Draft EIR Table 4-7, the proposed Project would be generally consistent with the updated Granite Bay Community Plan as identified in this table.

### **RESPONSE TO COMMENT 11-13**

While the proposed Project contains accessory operations (see Draft EIR page 3-13), these operations are accessory to the overall use of the site as a house of worship, are not considered a "commercial use," but are considered "promotion of religious activities" and are allowed uses pursuant to Zoning Ordinance Sec. 17.04.030.

As described in Chapter 1 (Introduction), the Granite Bay Community Plan has been updated since release of the Draft EIR. Based on review of the policies of the adopted Granite Bay Community Plan to the consistency analysis provided in Draft EIR Table 4-7, the proposed Project would be generally consistent with the updated Granite Bay Community Plan as identified in this table.

## RESPONSE TO COMMENT 11-14

As identified in the consistency analysis provided for these policies as well as for the rest of the Granite Bay Community Plan and General Plan in Draft EIR Chapter 4.0 (Land Use and Agriculture), the proposed Project is consistent with both planning documents. The traffic and visual impacts of the Project are addressed in Chapter 9.0 (Traffic and Circulation) and 8.0 (Visual Resources) of the Draft EIR. However, the Draft EIR does acknowledge that the proposed Project and its related intensity would result in significant and unavoidable aesthetic impacts as described in Draft EIR pages 8-14 through -16 and cumulative impacts as described on Draft EIR page 18-6.

As described in Chapter 1 (Introduction), the Granite Bay Community Plan has been updated since release of the Draft EIR. Based on review of the policies of the adopted Granite Bay Community Plan to the consistency analysis provided in Draft EIR Table 4-7, the proposed Project would be generally consistent with the updated Granite Bay Community Plan as identified in this table.

## RESPONSE TO COMMENT 11-15

Draft EIR page 14-38 identifies the water facility improvements associated with the proposed Project as well as the existing water pressure issues in the Project area. The water pressure issue is a pre-existing condition that is not associated with the proposed Project. Mitigation measure 14.7-2 identifies participation in any potentially required additional improvements that might be needed to ensure adequate water pressure and fire flow. The exact details of these potential improvements are not known at this time, but implementation of this mitigation measure would ensure that adequate water service is provided.

## RESPONSE TO COMMENT 11-16

It is acknowledged that the proposed Project will host special events during the holidays. However, these events, as well as a variety of other more frequent weekday evening activities, will commonly occur outside of the peak hour traffic conditions, and are not the basis on which the County designs its roadway facilities. Designing roadway facilities to accommodate special-event traffic would likely result in larger roadways and intersections that could result in further physical impacts to the environment.

Draft EIR pages 9-22 and -23 specifically address accessory uses on the site in addition to the house of worship as noted below. Clarifications to the Draft EIR text are noted:

It should be noted that the proposed resource center building included in Phase I would support the ministry by housing and distributing materials such as CDs, tapes, periodicals, etc., and would not generate any peak hour trips beyond those shown in **Table 9-7** above. Any truck traffic related to the resource center distribution activities would be limited (estimated to be approximately 14 trip-ends per week as described in KD Anderson's May 2011 Traffic Memo (see DEIR Appendix 9.0) and would occur Monday through Thursday only, outside of the peak hours analyzed.

As shown in **Table 9-7**, the initial 1,300 seats proposed for Phase I could generate 780 trips during the Saturday peak hour. Phase I of the Project is only expected to generate 71 trips during the weekday p.m. peak hour. At full occupancy at the end of Phase II, the

Project could generate 1,200 Saturday peak hour trips associated with main church services.

Weekday activities at the site will include typical ancillary activities that accompany house of worship operations. At full buildout, up to 80 persons are expected to work at the site as part of the outreach ministries. These persons would typically work on a normal 8:00 a.m. to 5:00 p.m. schedule. Additional staff will be involved with operating the facilities (total Project employment is estimated at 97 persons). ~~The current Seventh-Day Adventist (SDA) church in Sacramento also offers regular weekday activities, including prayer meetings and small study groups. These events are typically scheduled; refer to KD Anderson's May 2011 letter in the evenings after the peak commute hour or during midday. Appendix 9.0).~~

As noted, the most appreciable traffic volumes associated with the Project would occur on Saturdays before and after worship services. The amount of weekday Project traffic is very low in comparison to Saturday forecasts. Weekday traffic is low enough to suggest that an additional analysis of weekday conditions would not identify additional increased impacts or require additional mitigation measures. Per the standard Placer County practice for analyzing houses of worship, the impact analysis is limited to peak conditions on the day when services will be held, which in this case is Saturday.

### RESPONSE TO COMMENT 11-17

The commenter's suggestion regarding advance approval of roadway improvements with the City of Rocklin is noted. Should the Project be approved, the County may condition the Project to ensure agreements for roadway improvements are in place prior to site construction. Mitigation measure timing identified in the Draft EIR does identify when the improvements should be made.

In order to further address Project traffic impacts to Sierra College Boulevard, the Project applicant has proposed (as part of the Project) to re-stripe a portion of Sierra College Boulevard from Nightwatch Drive to El Don Avenue (see **Figure 1-4**). This re-striping would result in a complete four-lane Sierra College Boulevard from City of Roseville city limits to Interstate 80 (I-80). This re-striping was reviewed by KD Anderson & Associates regarding potential changes in traffic impacts identified in the Draft EIR. This analysis is provided in **Appendix A**. As shown in this analysis, the proposed re-striping would provide for improved intersection operations with Project conditions for "Existing Plus Approved Projects Conditions" (see Draft EIR pages 9-40 through -56 for a description of "Existing Plus Approved Projects Conditions") and "Cumulative Conditions" (see Draft EIR pages 18-7 through -18 for "Cumulative Conditions") for Sierra College Boulevard intersections at Southside Ranch Road, Ridge Park Drive (westbound movement), and Nightwatch Drive as noted below:

#### *Existing Plus Approved Projects Conditions for Saturday Peak Hour*

- Sierra College Boulevard/Nightwatch Drive (from LOS E to LOS C)
- Sierra College Boulevard/Ridge Park Drive (maintains LOS A for overall intersection operations but improves the westbound right- and left-turn movement delay by 4.3 seconds)
- Sierra College Boulevard/Southside Ranch Road (from LOS D to LOS A)
- Sierra College Boulevard/El Don Drive (maintains LOS A conditions).

### *Cumulative Plus Project Conditions for Saturday Peak Hour*

- Sierra College Boulevard/Nightwatch Drive (from LOS F to LOS C/D)
- Sierra College Boulevard/Ridge Park Drive (maintains LOS A for overall intersection operations but improves the westbound right- and left-turn movement delay by 4.3 seconds)
- Sierra College Boulevard/Southside Ranch Road (from LOS F to LOS A)
- Sierra College Boulevard/El Don Drive (from LOS A to LOS A/B).

Specifically, this improvement would eliminate significant and unavoidable impacts identified in the Draft EIR for the following intersections: Sierra College Boulevard/Southside Ranch Road (Impact 9.4 and cumulative plus Project impact) and Sierra College Boulevard/Nightwatch Drive (Impact 9.5).

### **RESPONSE TO COMMENT 11-18**

Issues identified by the commenter are addressed in the responses above.