

Letter 12

From: [Bob](#)
To: [Placer County Environmental Coordination Services](#);
cc: [Sans Bob](#);
Subject: Comments on Amazing Facts Ministry Draft EIR
Date: Monday, October 03, 2011 8:20:51 PM

PROPOSED PROJECT: Amazing Facts Ministry (PEIR 20080021 / State Clearinghouse# 2009022009)

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

In accordance with the notice issued by the Placer County Community Development Resource Agency, following are comments on the referenced project's Draft EIR:

Chapter 4, Land Use and Agriculture

The report indicates this proposed project is planned for an area that is zoned by Placer County as Farm with a Building Site combining district and the Placer County General Plan and Granite Bay Community Plan designate as Rural Estate (RE) with 4.6- to 20-acre minimum parcel sizes. The report further states that this area should "have the low intensity of development which is appropriate to its location" but does not address how a facility that is ultimately planned for as many as 2,000 people, a building space of over 200,000 square feet and 900 parking spaces would be considered "low intensity" in an area that is presently largely undeveloped. The report implies that the planned project is similar to the Sierra View Office Park, which is located across the street from the proposed development. No mention is made of the fact the Sierra View Office Park property was zoned for commercial use for a SIGNIFICANT number of years prior to the present development being constructed and that further the developer down-sized the planned commercial development and allowed for more housing construction to help maintain the residential flavor of the area, whereas the Amazing Facts Ministry project is proposed for an area identified as Farm/ Rural Estate. Proposing a house of worship could be a consistent with the

12-1

Letter 12 Continued

use of this parcel but the size of the proposed development does not seem to be consistent with zoning and/or planning use. A mitigation to this problem would be a house of worship that is substantially smaller in size than what is currently proposed.

**12-1
cont.**

Chapter 9, Traffic and Circulation

- There is only passing acknowledgement about traffic impacts that might be caused by this development during the week, yet the report indicates employment at the site of 97 and frequent deliveries to the planned campus. There is indication of usage of the recording facility and resource center distribution activities that “would occur Monday through Thursday only, outside of the peak hours analyzed” yet it is precisely during these Monday through Thursday times when traffic on Sierra College Boulevard is at its heaviest. Further, the report uses data that is now over 4 years old and uses Friday traffic counts in July. Sierra Community College, which generates a considerable amount of traffic on Sierra College Boulevard, is primarily a Monday through Thursday campus and summer enrollment is significantly less than traditional fall and spring classes. Given the reported increase in enrollment at Sierra Community College and the significant traffic constriction on Sierra College Boulevard, particularly in the northbound direction, without any currently identified dates to widen Sierra College Boulevard, there is a significant potential for more seriously degraded travel than indicated in the report and no real mitigation is offered.
- Sierra College Boulevard in the immediate vicinity of the proposed site is widely used by recreational bicyclists, particularly on Saturday mornings. While there is a southbound bicycle lane there is no northbound bicycle lane. The report does not address any potential impacts of such traffic other than dedication of right-of-way.
- Other potential traffic impacts include the fact this congregation currently holds Wednesday evening services at 7:00 pm (per their website) which again represents added traffic to Sierra College Boulevard when it is being heavily used and a Friday Night Young

12-2

12-3

12-4

Letter 12 Continued

Adult Bible Study that, while not presently meeting at their current church worship location, would be a prime candidate to be held at the proposed site. It is disingenuous at best to suggest that such a large facility would be largely unused during the week and a realistic assessment of how this property would be used and what the real impacts on traffic throughout the entire week would be should be included.

**12-4
cont.**

Even if the proposed project were reduced in size the adverse impact on Sierra College Boulevard traffic, particularly in the northbound direction, would likely be substantial. As the project is presently proposed the overall impact on traffic on Sierra College Boulevard as it presently exists would likely result in Level of Service being at Category D or worse. The appropriate mitigation would be to delay consideration of this project until northbound Sierra College Boulevard between Southside Ranch Road and Nightwatch Drive is widened to at least two lanes with a dedicated bicycle lane.

12-5

Thank you for your consideration of these comments.

Very truly yours,

Robert Sans
4630 Longview Drive
Rocklin, CA 95677
rsans@surewest.net

LETTER 12: ROBERT SANS

RESPONSE TO COMMENT 12-1

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 houses of worship (Bayside Church) as well as how the Project is an allowable use in the F-B-X zoning district with the issuance of a minor use permit. No significant land use conflicts were identified in the Draft EIR that would require mitigation.

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 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 12-2

Draft EIR pages 9-22 and -23 specifically address how the traffic analysis was focused on Saturday conditions and weekday conditions were not considered significant as noted below with some minor text changes to clarify the discussion.

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.

In addition, traffic count data for Sierra College Boulevard used in the Draft EIR appears to be higher than current conditions. 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 in May 2011 that identified an average daily traffic volume of 17,187 vehicles north of Secret Ravine Parkway (City of Roseville, 2011a). Thus, the traffic analysis provides an adequate evaluation of project impacts to Sierra College Boulevard and utilizes traffic count data that does not underestimate traffic volumes.

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 12-3

Draft EIR page 9-24 identifies that the Project would improve Sierra College Boulevard along its frontage, which would include widening and the provision of bicycle lanes in front of the Project, which will connect to and extend the existing bicycle lane located adjacent to the northbound lane. As noted above, the Project-proposed re-striping of Sierra College Boulevard would result in a complete four-lane Sierra College Boulevard from City of Roseville city limits to I-80 and includes the provision of bike lanes east of the site. No significant impacts to bicyclists are expected to occur.

RESPONSE TO COMMENT 12-4

The proposed Project is not currently planning to offer a Wednesday service; however, the commenter is referred to Responses to Comment 11-16 and 12-2 regarding the factoring of accessory activities during the week (such as bible study) and the related traffic generation.

RESPONSE TO COMMENT 12-5

Draft EIR Chapter 9.0 (Traffic and Circulation) identifies Project impacts to traffic operations along Sierra College Boulevard and mitigation measures that would be required to maintain acceptable levels of traffic operation. As identified in Response to Comment 12-2, 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. This re-striping would result in a complete four-lane Sierra College Boulevard from City of Roseville city limits to I-80 and would improve intersection operations along Sierra College Boulevard.

Letter 13 Continued

Public Hearing
Amazing Facts – October 13, 2011 – DEIR Adequacy

Even Though the DEIR suggests that the project has mitigated the many impacts, this isn't necessarily true.

The proposed project is regional in scale and larger than anticipated by the GBCP. It transforms the natural scenic qualities to a regional scale facility which will alter the character of the site and initiate potential land use compatibility issues. Even with the proposed mitigations, the perception that the facility is not rural in scale and character still exists. As proposed, the project is not consistent with policies in the GBCP as they relate to size, scale, and character of land development and the intent to maintain a rural setting.

It may come as a surprise, but 59% of GB is .9 to 20 acre zoning with 28% of open space. The area where this project proposes to locate abuts or overlooks about 40% of RR which is 2.3 to 4.6 and RE which is 4.6-20 acre zoning. This is the most rural area of GB.

The Number 1 Project Objective of this project is to accommodate the multifaceted ministry that supports their local and WORLDWIDE MISSION – an irreconcilable conflict with the GBCP which cannot be adequately mitigated.

The project still conflicts with numerous goals and policies of the GBCP listed in the GBCA letter of February 28, 2009, (attached) with regard to intensity, compatibility, and services and facilities for local residents which have not been adequately addressed or mitigated.

Granite Bay Community Association
Sandra H. Harris
P.O. Box 2704
Granite Bay, CA 95746

13-1

PLACER COUNTY
DATE RECEIVED

OCT 13 2011

PLANNING COMMISSION

Sandra Harris



SANDRA HARRIS
Issues Coordinator

Letter 13 Continued

GRANITE BAY COMMUNITY ASSOCIATION

P.O. BOX 2704 * GRANITE BAY, CALIFORNIA 95746 * (916) 791-7427

February 28, 2009

Maywan Krach
Environmental Coordination Services
Community Development Resource Agency
3091 County Center Drive
Suite 190
Auburn, CA 995603

Re: NOP of an EIR for Amazing Facts Ministries project (PEIR T20080021)

Thank you for the opportunity to respond to this NOP.

The major concerns with this project are the scale and aesthetic impacts:

Description in NOP says it all. This is an institutionalized setting dominated by large structures, parking lots, landscaping, and night lighting. The proposed project would introduce new night lighting sources in the form of pole-mounted lighting for parking lots, building lights, and entry feature lighting. In addition, some building materials proposed, such as metal panels, aluminum, and glass could produce daytime glare.

It will be visible from large areas of Granite Bay both night and day. The EIR should include areas from all over the community to determine night and day impacts.

Air quality – This site is in the heart of the “red zone” on bad air days. What is impact of concentrating so many vehicles on the top of a ridge where particulates can be scattered over a large area? There are two major hospitals, several schools, and many homes in the immediate area.

X The scale of this project conflicts with many goals and policies of the Granite Bay Community Plan, a few of which are listed below:

1

Letter 13 Continued

General Community Goals and Policies:

4. To conserve the visual and aesthetics resources of the community, including the significant vistas, woodlands and grasslands, and minimize the disturbance of the natural terrain. (The top of Sierra College Boulevard is considered a scenic vista in the GBCP.)

5. To provide the civic, cultural and recreational facilities and activities needed by the community, which encourage the interaction of residents in the pursuit of common interests and which result in a strong sense of community identity.

7. **To provide only those commercial, professional, and institutional services and facilities which are required to meet the frequently recurring needs of residents of the community and which are scaled to meet only the local residents' needs.**

General Community Policies:

1. Land uses in the GB Community shall be compatible with the Community Plan.

2. Uses of land in the GB Community shall, in general, be restricted to residential sites;
.....

Land Use Element:

B. Purpose - GB has a reputation as a visually pleasing, rural/residential area.

Policies in this element have been formulated to enhance the rural and natural qualities of this unique community. Land use policies are designed to prevent overuse of land and control intensity of use.

3. Compatibility between neighboring land uses should be encouraged.

4. Commercial uses which serve local community needs and which do not detract from the rural-residential setting should be encouraged.

15. Buildings shall be of a size and scale conducive to maintaining the rural residential atmosphere of Granite Bay. The architectural scale of non-residential buildings, as differentiated from size, shall be more similar to that of residential buildings than that of monumental buildings.

16. Non-residential buildings shall generally be of small or moderate size and, where groups of buildings are used, connected by plazas. Terraces, porches, arcades, canopies or roofs, to provide a pleasant environment as well as safety and shelter to pedestrians.

Letter 13 Continued

Specific Policies for Intensity of Use:

3. Intensity of use of individual parcels and buildings shall be governed by considerations of: health and safety; impact on adjoining properties due to noise, traffic, night lighting, or other disturbing conditions, and protection of natural land characteristics.

Specific Policies for Public and Private Institutions:

- * 1. Institutional uses shall be limited to those which provide non-commercial services or facilities for local residents and
- * 2. The intensity of use of an institutional site shall be limited to that which is compatible with adjoining uses and in keeping with the rural character of Granite Bay; the institution should not generate excessive noise or traffic.
- * 3. Institutional buildings shall be of a size and scale compatible with the rural atmosphere of the Community.

Community Design Element:

- 1. Maintain the existing rural character of the area.
- 9. Encourage the development of commercial project designs that do not detract from the rural character of the GB area.
- 11. To the maximum extent possible, all structures, including residences, should complement and blend in with the natural setting of the planning area, and to this end the following principles shall be adhered to:
 - a. The visual impact of the structure shall be mitigated either through reduction of building bulk, increased setbacks, or introduced screening such as landscaping. In general, hillside structures shall be designed to step down the natural hillside in order to achieve a low building profile and minimize grading.
 - c. Largely bare slopes and sparsely wooded ridges visible from large portions of the planning area should be kept free of structures to the maximum extent possible.
 - d. If development does take place on highly visible barren slopes or ridges, It must be unobtrusive and designed to maintain the character of the natural setting.
- 12. The use of natural materials (i.e. wood siding and field stone) is encouraged. Exterior colors shall blend with the surrounding natural landscape. The use of "earth tones" or natural finishes which blend with the natural background is encouraged.

Letter 13 Continued

14. Large, bulky and unscreened structures shall be discouraged, particularly if they are visible from the road.

Implementation:

....These Design Standards are specific to several corridors within the GBCP area... The roads included are Douglas Blvd., Auburn-Folsom Road, Sierra College Boulevard...

MAC Presentation – April 2, 2008

Representatives of Amazing Facts presented a lengthy proposal to MAC for a similar project in April, 2008. After much discussion, MAC and the audience expressed concern about too much density being proposed on just 17 acres of the parcel; the industrial/urban look of the buildings; the height of the proposed 60 foot steeple on the building overlooking the ridge; the height of the proposed buildings on the ridge being too high and intrusive; and the use of the remaining property. It appears that there has been little change to the proposal; in fact, the steeple has been raised two feet. Reducing the building total by 20,000 sf seems insignificant and doesn't address many of the concerns raised by the community.

County Should Re-examine Allowed Uses of Churches in RA zoning

Previously, I have encouraged County to re-examine the use of churches in this zone district. When churches reach a certain size, they are no longer for local residents but become regional in nature, thus creating many impacts to the rural residential/agriculture zone district. Some jurisdictions of the State have recognized this direction of religions to reach mega status and have zoned areas specifically for churches in business/professional or commercial areas where parking can be shared on weekends and impacts to residential neighbors lessened. An example of this locally, is the Valley Springs Presbyterian Church in Roseville in Olympus Point just east of Sierra College Boulevard and north of Douglas. The church is in an area surrounded by business/professional and has plenty of shared parking available on weekends.

Very truly yours,



Granite Bay Community Association

LETTER 13: SANDRA HARRIS, GRANITE BAY COMMUNITY ASSOCIATION

RESPONSE TO COMMENT 13-1

The Draft EIR identifies that several impacts can be mitigated to a less than significant level, but does acknowledge impacts associated with visual resources (project and cumulative), traffic (project and cumulative), and cumulative air quality cannot be mitigated to a less than significant level (see Draft EIR page 18-30).

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 houses of worship (Bayside Church) as well as how the Project is an allowable use in the F-B-X zoning district with the issuance of a minor use permit. No significant land use conflicts were identified in the Draft EIR that would require mitigation.

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).

The Draft EIR also provides an analysis that the proposed Project would be generally consistent with the policy provisions of the Granite Bay Community Plan, including policies applicable to the Project identified in the Granite Bay Community Association February 28, 2009, correspondence (see pages 4-23 through -25 and 8-9 through -12 of the Draft EIR). While it is acknowledged that the Project would be an intensive land use for the proposed development area of the site along Sierra College Boulevard, 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 Draft EIR page 3-11 does identify the following project objective associated with their worldwide mission:

Develop the Amazing Facts house of worship facility and offices to accommodate the multifaceted ministry that supports their local and worldwide mission;

However, it is common for houses of worship and associated religions to have identified objectives (e.g., charity, assistance with other congregations, etc.) that reach beyond the local community. 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 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 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.

The commenter's statements with respect to the Granite Bay Community Plan will be forwarded to the decision-makers for their consideration.

Letter 14



More information on the project is available on the County web site:

<http://www.placer.ca.gov/Departments/CommunityDevelopment/EnvCoordSvcs/EIR/DryCreekTransportation.aspx>

Project Title: Amazing Facts Ministry (PEIR 20080021)

Public Hearing Date: October 13, 2011

Public Review Period: September 2, 2011 to October 17, 2011

- Your comments must be postmarked by October 17, 2011
- Comments must be written legibly with complete contact information in order to be considered.
- Comments may be sent:

By Fax 530-745-3080
 By Email cdraecs@placer.ca.gov
 By Mail Environmental Coordination Services
 Placer County Community Development Resource Agency
 3091 County Center Drive, Suite 190
 Auburn CA 95603

PLACER COUNTY
 DATE RECEIVED
 OCT 13 2011
 PLANNING DIV
 Jane Meyer

- Please attach additional pages if more space is needed.

The proposed project is not consistent with the goals and policies in the Granite Bay Community Plan and the mitigation measures have not resolved this issue. Goal #1 of the G.B.C.P. states "Protect and preserve the unique rural character of the community and maintain the identity of Granite Bay as a scenic, tranquil, family-oriented rural/residential community, compatible with the area's physical constraints and natural features."

14-1

Your Name Jane Dequin
 Mailing Address 4502 Olive Ranch Rd
 City Granite Bay State Ca Zip 95746

Letter 14 Continued

This project does not protect the rural character of the property. It is not compatible with the surrounding zoning which is either R.R. 2.3-4.6 or R.E. 4.6-20 acre zoning.

The fact that this project is focused on reaching people out of our community with a "world wide mission" is one of the main objections to placing it in an area of residential zoning. This incompatibility to our G.B.C.P. cannot be mitigated. The size and scope of this project is more consistent with an area with commercial zoning.

Building this massive compound to serve a current congregation of 350 people is not in keeping with the G.B.C.P. goal to maintain "Sainte Bay as a scene, tranquil, family oriented rural/residential community".

There are many other aspects of this project and its effect on the local community that have not been satisfactorily resolved, visual resources, traffic and circulation, greenhouse gas and climate change along with removal of 5 significant oak trees.

14-1
cont.

LETTER 14: JANE NEGRI

RESPONSE TO COMMENT 14-1

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 houses of worship (Bayside Church) as well as how the Project is an allowable use in the F-B-X zoning district with the issuance of a minor use permit. No significant land use conflicts were identified in the Draft EIR that would require mitigation.

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:

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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).

The Draft EIR also provides an analysis that the proposed Project would be generally consistent with the policy provisions of the Granite Bay Community Plan (see Draft EIR pages 4-23 through -25 and 8-9 through -12 of the Draft EIR associated with land use compatibility and character). While it is acknowledged that the Project would be an intensive land use for the proposed development area of the site along Sierra College Boulevard, 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). As identified in Draft EIR pages 4-27 and -28, no land use impacts would occur from the implementation of the Project.

The Draft EIR page 3-11 does identify the following project objective associated with their worldwide mission:

Develop the Amazing Facts house of worship facility and offices to accommodate the multifaceted ministry that supports their local and worldwide mission;

However, it is common for houses of worship and associated religions to have identified objectives (e.g., charity, assistance with other congregations, etc.) that reach beyond the local community. 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 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 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.

The Draft EIR identifies that several impacts (including tree removal) can be mitigated to a less than significant level, but does acknowledge impacts associated with visual resources (project and cumulative), traffic (project and cumulative), and cumulative air quality cannot be mitigated to a less than significant level (see Draft EIR page 18-30). As identified in Response to Comment 5-7, an additional mitigation measure has been included requiring the purchasing carbon offset credits that are verified and registered with the Climate Action Reserve that would now mitigate this impact to less than significant.

Since release of the Draft EIR, 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) and would further mitigate traffic impacts on intersections along Sierra College Boulevard. A detailed discussion of this improvement is provided in Chapter 1 (Introduction).

The commenter's statements with respect to the Granite Bay Community Plan will be forwarded to the decision-makers for their consideration.

Letter 15



PLACER GROUP
P.O. BOX 7167, AUBURN, CA 95604

October 16, 2011

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Maywan Krach
Environmental Coordination Services
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Ladies and Gentlemen:

RE: Amazing Facts Ministry (PEIR 20080021)

The Sierra Club submits the following comments on the proposed Amazing Facts Ministry project Draft Environmental Impact Report (DEIR). We have grave concerns regarding the proposal's inappropriate-for-setting scale and environmental impacts.

1—Aesthetics [p16/7]

Due to the extremely large footprint of the building(s), as well as vertical elevations and the parking lot(s), the scale of the proposed project is not in keeping with the surroundings or the Granite Bay Community Plan (GBCP). The GBCP is clear in its mandate that buildings shall be of a size and scale conducive to maintaining the rural residential atmosphere. As cited in the DEIR, the GBCP could not be more clearly stated: The architectural scale of non-residential buildings, as differentiated from size, shall be more similar to that of residential buildings than that of monumental buildings.

15-1

General Plan Consistency Analysis clearly indicates in fairly strong language ("The County shall require...") that the proposed project is inconsistent with the County's General Plan. As appreciated as attempts to buffer the project may be, they are inadequate and do not mitigate the noncompliance. It doesn't matter how neutral the materials and colors are; if the project does not comply with the General Plan, it cannot be allowed to proceed.

This proposed project appears to be ignoring both the GBCP and the Placer County General Plan. Please explain how the mandates in both these plans will be enforced with this proposed project.

We submit that this project as proposed is ill-suited for the site. This opinion is supported by a statement in the Initial Study (IS) that the proposed project will "... alter the site from a natural landscape setting to an institutional setting dominated by large structures, parking lots, landscaping and night lighting." This project belongs in an industrial setting and not a rural/ag/res community. Please explore other locations for the proposed project if the buildings and parking lot sizes cannot be downsized.

Light and Glare impacts are not adequately addressed in this DEIR. The existing conditions are spelled out for some surrounding parcels, but the existing conditions on

15-2

Letter 15 Continued

Amazing Facts DEIR Comments, page 2

the 74-acre site, which is relatively much larger than any of the cited surrounding parcels, have not been identified or addressed. The California Environmental Quality Act (CEQA) requires that the existing conditions of the project itself and impacts to that baseline must be analyzed, but this DEIR does no such analysis to either.¹

What cursory discussion is provided seems to be limited in scope. Assuming Amazing Facts will have some activities after dark, not only will outside lighting impacts be an issue, but also night light emitted from windows after dark from a 62' tall structure will be highly significant, not only to surrounding parcels but also to migrating wildlife. It is a well-known and accepted scientific fact that artificial night lighting can and does disorient migratory birds ("positive phototaxis" and/or beacon effect).² Reflection in mist or fog (for which the area is prone) can exacerbate the problem. Please identify and assess light and glare from CEQA's baseline or existing conditions requirement and then identify and assess all light and glare impacts from the proposed project.

15-2
cont.

Please explain why Alternative 2, a scaled-down version, would not be more appropriate for this location when considering aesthetics.

15-3

Although we commend the DEIR preparers for their excellent visual presentations and elevations, we were very disappointed in the architecture of the buildings.³ If ever a stunning landscape parcel deserved first-class architecture, it would be this one. Instead, the proposal will saddle the parcel and all who have to look at it from below, with what appears to be tilt-up industrial buildings with no spirit, no delight, and no relationship or sensitivity to its existing landscape qualities. Those may be subjective values, but aesthetically the design of the structures is blight on an otherwise spectacular piece of property.

15-4

6—Biological Resources

The DEIR appears to have some serious deficiencies in this section.

¹ Sunnyvale West Neighborhood Association, et al Vs City of Sunnyvale, 190 Cal. App. 4th 1351 Court case: This case is a reinforcement of the long-standing CEQA requirement that the environmental impacts of a proposed project must be compared to baseline conditions. Baseline conditions are the existing physical conditions in the affected area as they exist.... The most important point from this case is that a traffic impact analysis, just like any other environmental impact analysis under CEQA, must contain an explicit discussion of future conditions with project compared to the existing baseline conditions..... There must be a comparison back to baseline conditions.

² It is estimated that over 100 million birds die in the United States each year as the result of collisions with windows. Window strikes can be deadly for both large and small bird species. Twice annually, migrating birds travel to and from their wintering and breeding grounds, a distance anywhere from a few hundred miles to a few thousand miles, depending on the species. For many migrants, these long-distance flights take place at night and, because they are attracted to light, thousands die or are injured when they strike illuminated buildings, especially on foggy or rainy nights. (Massachusetts Audubon:

http://www.massaudubon.org/Nature_Connection/wildlife/index.php?subject=Birds:%20General%20Info&id=84)

Additionally, apart from insects, birds that migrate during the night are especially affected (Verheijen 1958). This may cause direct mortality, or may have indirect negative effects through the depletion of their energy reserves. (<http://www.ecologvandsociety.org/vol13/iss2/art47>)

³ Chapter 8-Visual Resources, page 33/44 Figure 8-4d, "Visual Simulation – Phases I & II (Location C)"

Letter 15 Continued

Amazing Facts DEIR Comments, page 3

Vernal Pools. With the alarming loss of vernal pools along the northern foothills and lowlands, it would be a tragedy to lose even one more, let alone 38 more—or impact any one of the 38 on the project site.

15-5

Black Rail. The DEIR gives the standard description of the Black Rail habitat and summarily dismisses the project site as not having suitable habitat. However, the DEIR then seemingly contradicts the unsuitable habitat claim by stating that the project site provides marginally suitable nesting habitat for this species AND that there is one recorded occurrence for this species within 5 miles of the project.

The DEIR is insufficient and inadequate in its Black Rail analysis, or rather, its lack of a proper Black Rail on-the-ground survey using scientifically acceptable protocol.⁴ Black Rails are a rare and secretive marsh bird with a disjointed and poorly understood distribution. Observation and analysis of habitat is not acceptable protocol for determining the presence or lack thereof of Black Rail. Mere assumptions based on perceived or real habitat suitability is totally unacceptable by even the most meager standards.

15-6

From the July, 2008 Journal of Field Ornithology, “Distribution of California Black Rails in the Sierra Nevada Foothills,” by Orien M. Richmond, Jerry Tecklin, and Steven R. Beissinger, renown Black Rail experts, the following information is extracted:

“Our results indicate that Black Rails are more widespread in the Sierra foothills than previously known.... Occupancy surveys may be an improved method for monitoring population trends of this secretive marsh bird where habitat patches are highly fragmented.”

O. M. Richmond, et al, concluded, “Black Rails have a wider distribution in the Sierra foothills than previously known.” For this DEIR to conclude the absence of Black Rails on the project site based on a cursory, conflicting observation-only opinion and without a proper survey does not meet CEQA standards.

Black Rails can be negatively impacted by the presence of people within certain ranges. Please have bona-fide Black Rail experts conduct a proper survey, following rigidly defined scientific protocol, for this listed (MBTA) and CA fully protected species and share the results with the public via a re-circulated or supplemental EIR.

Western spadefoot, as a species of special concern, would appear to be highly likely to be present on the Project Study Area (PSA) and would logically seem dependent upon the 38 vernal pools. The DEIR, Chapter 6, Biological Resources, pages 11-12, does not address what, if any, studies were conducted to identify the species. The habitat is there, but we are not informed as to the species findings nor of any impact conclusions.

15-7

Please provide information as to the findings related to the Western spadefoot in the PSA.

Mitigation Measures (Ch 6, Biological Resources, pg 34-35) appears to be a discussion of mitigation measures (MM), but it is not clear as to exactly how the vernal pools and the wetlands losses will be mitigated in Placer County. There is discussion around permitting, but the impression is that the permits from other regulatory agencies

15-8

⁴ Proper protocol requires occupational surveys with very specific times of day, prescribed sequencing of playbacks, multiple repetitions. Challenges to estimating or detecting Black Rail include breeding status, sexual variances, weather, season, and distance from playback.

Letter 15 Continued

Amazing Facts DEIR Comments, page 4

will either suffice for the mitigation or that we, the public, will learn of the mitigation after those permits are obtained.

CEQA requires that the public be informed of the impacts and the mitigation. This DEIR is lacking much needed information and/or appears to defer it to future state or federal permitting processes, which may or may not require mitigation. Regardless of the conditions for the state or federal permits, the County must have mitigation in place before approving any parts of the DEIR. If the County mitigation satisfies state or federal permitting agencies, so be it. If those jurisdictions require greater mitigation, so be it. Regardless, CEQA requires that mitigation measures be provided.

15-8
cont.

We urge a 3:1 mitigation ratio for the loss of both vernal pools and wetlands, and a no-net loss of the seep, pond, and drainages. All mitigation should be within the same watershed, as mentioned, or at the very least, be in county. Payment to in-lieu fee programs should not be allowed for the mitigation.

“Significant” Tree Mitigation is inadequate. Any significant oak tree that is, for example, 25” dbh has much greater value than 25 trees with 1” dbh. Mitigation on an inch-for-inch basis on oak trees over 24 inches dbh or greater is insufficient. In-lieu fees for acquisition and preservation of oak woodlands (Tree Preservation Fund) in the County has merit, but \$100 per diameter inch is also inadequate. “Current market value” should be determined by the County or other professionals who have no self-serving interest in the determination.

15-9

Mitigation for oak woodland loss and habitat fragmentation that results in payment for a conservation easement on in-kind oak woodland property in Placer County is much more acceptable. However, rather than funds sitting and land values rising, possibly making the funds deflate, the in-kind oak woodlands should be purchased before any construction begins. The payments should be due prior to approval, but the project should not be allowed to begin until the escrow closes on the in-kind conservation easement and the in-perpetuity management component.

13—Hydrology and Water Quality

Granted, the existing drainage patterns and watershed boundaries of the project site are proposed to remain the same—no significant areas being diverted to other watersheds. However, creating almost 12 acres of impervious surfaces is major—a very significant impact to the Miners Ravine and eventually Dry Creek. The existing pond/detention basin may collect and hold “all” project runoff, but with climate change and obvious unpredictability of storms/rainfall totals in any one storm event, it is highly unlikely that the detention basin will indeed hold all runoff from the project under all circumstances. Have all storm ranges and rainfall amounts been factored in with regard to the pond capacity to not overflow? What are the upper limits in terms of rainfall (per inch per hour? or four hours? or longer?) that the system could contain?

15-10

Even assuming the pond has the capacity and ability to hold all runoff, there is no guarantee that the runoff from the impervious surfaces will stay contained in the storm drains leading to the pond. A primary concern is with the runoff from the massive parking lot—oils, greases, brake lining, and other toxic residues associated with vehicles, asphalt, etc. With a 35% grade, once any parking lot runoff “overflows,” its toxins will possibly reach the Dry Creek watershed. With the parking lot being the biggest runoff threat, please investigate alternatives. Please consider the advantages and disadvantages

Letter 15 Continued

Amazing Facts DEIR Comments, page 5

of constructing a multi-story parking garage (above or below ground) to reduce the impervious surface footprint.

The storm drainage collection methods mentioned are not guaranteed to keep toxic runoff from ending up in Miners Ravine and adding pollution to the Dry Creek watershed. BMP's are often "cheap, easy, and ugly." The drainage collection methods are only as reliable as their monitoring—on regular schedules as well as irregular to deal with storm events, or other impediments. Once a filter is plugged, or a basin filled, its capacity to reduce water pollution is diminished or negated. How will residue, sediment, and other particles that build up in the vaults or basins be disposed of? Who will monitor the long-term maintenance issues?

Mandatory inspections of the system and testing of the water below the detention basin by the County should be required, but how will such inspections be funded?

How will violations or noncompliance be handled?

How will rooftop runoff be contained? Will rain barrels, cisterns, or rain gardens be utilized?

Unless impervious surfaces are reduced, possibly by utilizing Low Impact Development (LID) methods (require the project to use pervious pavers or porous concrete for the parking lot, for example), this project will more than likely contribute to the toxic load in the Dry Creek watershed, especially in a major storm event.

The DEIR does not give citizens enough information to ensure toxic runoff will be addressed. What are the possibilities of such runoff eventually entering the Dry Creek watershed? Until the runoff issues are totally resolved, the project should not proceed.

15-10
cont.

Miscellaneous

*The parking lot elevations do not show any shading. With the summer heat causing asphalt gas releases and excessive heat emissions, these are impacts that should be addressed. How will the massive parking lot be shaded to reduce the heat of the lot on hot days?

15-11

*Mentioned in a number of places in the CEQA documents are words to the effect that approximately one acre of the site includes the paved Sierra College Boulevard. One reference is to the "1 acre of the northern Project site." It is unclear whether the reference is to the total of the road easement (linear footage) or if there is a separate acre of land utilized by Sierra College Blvd. Please explain the relevance of the statement regarding one acre of Sierra College Blvd being included in the project. Is there an easement expansion issue? Is Amazing Facts being assessed a special fee for the privilege and value of public road frontage and access?

15-12

Thank you for considering our views,



Marilyn Jasper, Chair

LETTER 15: MARILYN JASPER, SIERRA CLUB

RESPONSE TO COMMENT 15-1

The Draft EIR provides an extensive analysis of both the visual impacts of the proposed Project and its consistency with the policy provisions of the Granite Bay Community Plan (see Chapters 4.0 and 8.0 of the Draft EIR). 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 transitional urban uses including other houses of worship (Bayside Church) as well as how the Project is an allowable use in the F-B-X zoning district with the issuance of a minor use permit.

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.

The commenter’s statements with respect to the Granite Bay Community Plan will be forwarded to the decision-makers for their consideration.

RESPONSE TO COMMENT 15-2

Draft EIR page 8-2 specifically describes current light and glare conditions in the Project area. Given that there is no development on the Project site, there are no existing on-site sources of

light or glare. Lighting impacts identified by the commenter are specifically addressed on Draft EIR page 8-17 under Impact 8.5, which was identified as a potentially significant impact. Mitigation measure 8-5a would require limiting on-site lighting for public safety, as well as shielding, light fixture height restrictions, and fixture coloring to mitigate the lighting impact. Mitigation measure 8-5b requires the use of non-reflective building materials. Thus, this impact has been addressed and mitigated.

As identified on Draft EIR page 3-12, the proposed buildings would range in height from 28 to 58 feet (including antenna and architectural features), which is similar to the height of existing residential homes and commercial buildings in the area. In addition, the Project site is not located within the Pacific Flyway or a critical migratory corridor for birds or raptors. Given that the Project would not impact a critical movement corridor or result in new building structures substantially taller than current development conditions, no significant impacts from bird strikes are expected.

RESPONSE TO COMMENT 15-3

Alternative 2 is Development Under the Existing Zoning Alternative and does not involve the development of a house of worship. Alternative 3 is the reduced scale of the Project. As identified on Draft EIR page 17-15, the buildings under this alternative would be just as visible as the proposed Project and would not provide a substantial reduction in visual impacts.

RESPONSE TO COMMENT 15-4

The commenter's opinion regarding the architectural design of the Project is noted and will be forwarded to the decision-makers for their consideration. The Draft EIR visual impact analysis utilized this design for the analysis, and that analysis indicates there are very few properties from which the Project will be visible due to both the placement and the design of the buildings.

RESPONSE TO COMMENT 15-5

Draft EIR page 6-35 (Impact 6.6) identifies that the proposed Project would impact 0.21 acres of vernal pools on the site (the project wetland delineation identified a total of 0.223 acres of vernal pools). Mitigation measure 6-6 would require that this impact be mitigated to a no-net-loss performance standard.

RESPONSE TO COMMENT 15-6

Draft EIR page 6-13 specifically notes that the potential for the California black rail to occur on the Project site is limited to the existing pond area approximately 100 feet lower than and approximately 1,600 feet south of the nearest building. Mitigation measure 6-6 would require mitigation and likely restoration of the impacted habitat areas associated with the existing pond. Mitigation measure 6-4 states that the applicant shall schedule construction to avoid nesting activities, establish exclusion zones, or complete the construction during the non-breeding season for all potential impacts to special-status avian species that would include the California black rail.

However, the following additional mitigation is added to mitigation measure 6-4 on Draft EIR page 6-44:

- Potential nesting habitat for black rail occurs in the riparian vegetation associated with the detention pond and drainage on the Project site. All ground disturbance and removal of vegetation to these areas shall be avoided during the bird's breeding season (approximately March through May). If construction activities cannot be avoided during the breeding season, a qualified biologist shall be retained to conduct a pre-construction survey to determine presence/absence of active nests. If active nests are found, the applicant shall designate a construction-free buffer zone (typically 250 feet) around the nest.

RESPONSE TO COMMENT 15-7

Impacts to western spadefoot toad are addressed on Draft EIR page 6-32 (Impact 6.2). Impact 6.2 states that implementation of the proposed Project could result in the loss of populations or essential habitat for the western spadefoot toad. The Draft EIR also states that implementation of the proposed Project is not expected to reduce the populations of this species below self-sustaining levels within the region due to the small acreage of loss of potential habitat and that impacts to this species are considered to be less than significant. Therefore, further mitigation measures are not required. In addition, implementation of mitigation measure 6-6 would also serve to mitigate potential impacts on western spadefoot. Surveys, as suggested by the Sierra Club, and mitigation are not necessary.

RESPONSE TO COMMENT 15-8

Mitigation measure 6.6 sets forth a performance standard of “no net loss” of waters of the U.S., including vernal pools, wetlands, seeps, ponds and drainages, and identifies several options to compensate for any loss of such features. Use of performance standards is provided for under CEQA Guidelines Section 15126.4(a)(1)(B). Placer County requires that proof of mitigation be provided prior to commencement of any construction on site.

RESPONSE TO COMMENT 15-9

Mitigation measure 6-8 is consistent with and implements the Placer County Tree Preservation Ordinance that is intended to address and preserve trees considered important to the County. The Sierra Club provides no analysis or rationale why this mitigation approach does not adequately address tree loss or why inch-for-inch or \$100 per diameter (or current market value as identified in mitigation measure 6-8) is not adequate. Both of these performance standards meet the requirements of CEQA Guidelines Section 15126.4a(1) as well as “rough proportionality” (i.e., mitigation requirements must be in proportion to the impact on oak trees) requirements of CEQA Guidelines Section 15126.4(4)(B). Mitigation measure 6-9 differs from mitigation measure 6-8 as it addresses the loss of oak woodland through preservation of other in-kind oak woodlands in the county through in-lieu payment equivalent to the fair market value of a conservation easement for lost oak woodland. Combined, these measures reduce oak tree loss to a less than significant level.

RESPONSE TO COMMENT 15-10

The impact of adding 12 acres of impervious roof, asphalt and concrete surfaces is less significant than one might think for a couple of reasons: First, the impervious surface areas are on top of shallow, stony soil that is immediately underlain by hard Mehrten caprock or

hard andesitic breccia, which is very impermeable. The proposed impervious area comprises approximately 11 acres on site and 1 acre off site for the widening of Sierra College Boulevard. Secondly, the existing pond is proposed to act as a detention basin with a restricted outlet.

The volume of the pond is adequate to fill during a storm event with an incoming flow rate that is higher than the outflow rate. Draft EIR Appendix 13 contains the Preliminary Drainage Study for Amazing Facts that provides flow data for 2-, 10-, 25-, and 100-year storm events. Pages b1 and b2 of Draft EIR Appendix 13 provide a summary of the flow changes from the pond, and Section C contains details modeling assumptions on the storm events and rates of flow. The pond is designed to meet the requirements of the Placer County Flood Control (PCFC) and Water Conservation District Stormwater Management Manual, a copy of which is on file at the Planning Department and available for public review. This means the pond spillway will be modified to meet the required freeboard between the high water level in the pond and the top of the dam during a 100-year storm event to ensure that the pond will not overtop the dam. It also means that the after-development peak storm runoff from the site is equal to or less than the before-development peak runoff for the 2-, 10-, 25-, and 100-year storm events.

Drainage inlets, storm drain pipes, ditches, grass-lined swales, and detention basins are all sized to handle the 100-year storm event pursuant to the PCFC, including designing for 50 percent blockage where required. If in the very unlikely event a drainage inlet were to become blocked and overtop temporarily, the drainage from the blocked inlet would travel into the downhill grass-lined detention swales and then overland via sheet flow through the existing grassland, ending up at the existing pond where there will be additional detention of the runoff prior to leaving the pond as described above. The temporary and permanent drainage best management practices (BMPs) will be designed to address removal of sediments by detaining stormwater runoff to allow settling and removing pollutants such as oils and grease through soil contact, soil absorption, oxidation, root zone uptake, and bacterial breakdown. Prior to construction, a stormwater pollution prevention plan will be prepared and submitted to the Central Valley Regional Water Quality Control Board.

Constructing a multi-story parking structure would not eliminate the possibility of a drainage inlet overflow due to blockage. A reduced footprint may reduce the peak runoff flow rate, but because of the existing site's impervious Mehrten and andesitic breccia rock formation, it is expected to be only a slight reduction. A multi-story parking garage would result in further visual impacts greater than currently identified in the Draft EIR. The use of pervious pavers or porous concrete in the parking lot is not viable as a method to reduce runoff due to the underlying impervious rock formation.

The Project applicant will be required to fund and perform all storm drainage system inspections, monitoring, and maintenance including BMPs. Deposits and sediments in the drainage inlets and grassed swales will be removed during dry weather months, sorted from any trash, and disposed of at an appropriate disposal location. Unauthorized non-stormwater discharges that cause or contribute to an exceedance of any applicable water quality objective or water quality standards are a violation of the Clean Water Act and the Basin Plan and would be reported to the Central Valley Regional Water Quality Control Board. Water quality standards are published in the Basin Plan for the Central Valley Region, the California Toxics Rule, and the National Toxics Rule.

RESPONSE TO COMMENT 15-11

Draft EIR Figures 3-6a and 3-6b show parking lot landscaping that includes the use of trees. The parking lots will be required to be in compliance with County Zoning Ordinance Section 17.54.070A (Parking Lot and Parking Space Design and Layout).

RESPONSE TO COMMENT 15-12

The 1-acre reference is in regard to the frontage and associated frontage improvements with Sierra College Boulevard. There are no proposed expansions of easements or assessment of special fees associated with the Sierra College Boulevard frontage.

Letter 16

From: [Janet Thew](#)
To: [Kathi Heckert](#);
cc: [Maywan Krach](#);
Subject: comments on Amazing Facts draft EIR
Date: Monday, October 17, 2011 4:52:54 PM

I've read the draft EIR summary available on the county website, but did not find the draft EIR itself.

My initial concerns include:

Phases I and II would cause an unacceptable level of service (LOS D) at the Sierra College Blvd./Rocklin Road intersection. The impact would be significant and unavoidable. For those of us who depend on this intersection in our daily lives, this is very disturbing. The project would create a significant amount of Saturday traffic (1200 peak hour trips), which is already heavy. Rocklin is not likely to upgrade that intersection again in the near future, as they just did so. The LOS D would continue for years, no matter how much money the project contributes for traffic impacts. That money would sit in Rocklin's coffers while we sit in traffic.

16-1

The summary clearly states that the project is not consistent with the state's AB 32 goals, another significant and unavoidable impact.

16-2

The cumulative impacts include growth-inducing potential. This is very significant in the CEQA process, and deserves extra scrutiny.

16-3

Alternative 3 uses only a project reduction to Phase I - still over 100,000 sq. ft. and over 600 parking spaces. Another alternative on an even smaller scale should be considered.

16-4

The colossal size of this proposed project does not fit with the Granite Bay Community Plan or the needs of those of us who live nearby.

16-5

Thank you for considering my comments.

Janet Thew
 5572 St. Francis Cir W
 Loomis CA 95650

LETTER 16: JANET THEW

RESPONSE TO COMMENT 16-1

Draft EIR Chapter 9.0 (Traffic and Circulation) identifies Project impacts to traffic conditions along Sierra College Boulevard as well as mitigation measures required to maintain the appropriate level of service.

Since release of the Draft EIR, 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) and would further mitigate traffic impacts on intersections along Sierra College Boulevard. A detailed discussion of this improvement is provided in Chapter 1 (Introduction). 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.

RESPONSE TO COMMENT 16-2

Draft EIR pages 16-16 through 16-22 (Impact 16.2) identify the Project’s climate change impact and mitigation measures to address the Project’s consistency with AB 32. As identified in Response to Comment 5-7, an additional mitigation measure has been included requiring the purchase of carbon offset credits that are verified and registered with the Climate Action Reserve that would now mitigate this impact to less than significant.

RESPONSE TO COMMENT 16-3

The Draft EIR addresses potential growth effects of the Project on Draft EIR pages 18-28 and 18-29. The Project would not directly induce growth through increases in population or significant increases in employment.

RESPONSE TO COMMENT 16-4

Draft EIR alternatives analysis provided in Chapter 17.0 (Alternatives to the Project) evaluates a reasonable range of alternatives that attempts to meet the basic objectives of the Project while avoiding or substantially lessening the significant environmental effects of the proposed Project. Alternative 3 would reduce the size of the Project by 90,000 square feet and would avoid significant traffic impacts at study intersections (with the exception of Sierra College Boulevard/Rocklin Road) (see Draft EIR page 17-15). Additional alternatives that further reduce the size of the Project were not considered reasonable and would not meet the Project’s basic objectives identified below that are associated with the provision of meeting their local and worldwide mission and provision for the growth of the congregation (see Draft EIR page 17-17 and -18).

- Develop the Amazing Facts house of worship facility and offices to accommodate the multifaceted ministry that supports their local and worldwide mission;
- Develop a house of worship facility to serve the surrounding community;

- Attain the goal of eventually building a 2,000-seat facility with supporting ministry space;
- 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.

RESPONSE TO COMMENT 16-5

The Draft EIR provides an analysis that the proposed Project would be generally consistent with the policy provisions of the Granite Bay Community Plan (see Draft EIR pages 4-23 through -25 and 8-9 through -12 of the Draft EIR associated with land use compatibility and character). 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.

It is important to note that 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 Granite Bay. 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. It is anticipated that the Granite Bay membership will continue to grow 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.

Letter 17

From: [Kim Zercie](#)
To: [Maywan Krach](#);
cc: [Alpine Blue Construction](#); [Arlene Hill](#); [Birkland](#); [Bob/ Cindy Shannon](#); [Christina Schuler](#); [Heidi Weiss](#); [Ikeda](#); [Jamie Favero](#); [Jennifer Bean](#); [Jennifer Zins](#); [Jim Fagundes](#); [kathy phelan](#); [mdccompany@surewest.net](#); [Melody](#); [Milo Terzich](#); [Norm Plotkin](#); [Petra Collamer](#); [Rachel Lund](#); [robert simmons](#); [Ryan Byrd \(jenbyrd2001@hotmail\)](#); [Stacy Yow](#); [The Hamm"s](#); [Todd Cook](#); [Tom Martinez](#);
Subject: Comments to the Planning Commission re;Amazing Facts Ministry Draft EIR
Date: Monday, October 17, 2011 1:57:20 PM

We are the residents of Sierra View (located on the West side of Sierra College Blvd.) at Nightwatch and contiguous neighborhoods.

We have met with Dave Cook from The RCH Group and reviewed elements of the Draft EIR. Based upon the information as we understand it we have the following concerns:

- 1.) The original traffic study was done several years ago, prior to the completion of the Sierra College/I-80 interchange. Have traffic counts and models been updated to reflect any regional changes in traffic patterns that have resulted from the new, improved interchange? **17-1**
- 2.) Additionally, the original traffic study predates the full approval and commencement of construction of the regional shopping center on the Northwest corner of Sierra college and I-80. Grading has just begun there – does the traffic study reflect the full build-out and cumulative impact of ALL the projects at that location? **17-2**
- 3.) With potentially 35 shipping trucks/trips (including pickup and drop-off) initiating at the proposed Amazing Facts site. There are several concerns regarding traffic.
 - a. the intersection of Sierra College and Rocklin Road; particularly Southbound is noted in the EIR as being “significantly and unavoidably impacted” should the project go forward as is. Again, what plans are being developed to minimize the negative impact?
 - b. the intersection of Nightwatch and Sierra College was not designed with a commercial or industrial project in mind. Does the traffic study address, and what considerations – if any – have been made to address impact to the residential neighborhood on the Rocklin side and to prevent unacceptable queuing at peak (and non-peak hours). **17-3**
 - c. What about large truck brake noise at the right turn in for the Warehouse

Letter 17 Continued

d. What about large trucks accelerating/decelerating at the entrance for the Warehouse and their impact on traffic coming through the intersection at Nightwatch AND where the road is planned to go back to one northbound lane from two.

**17-3
cont.**

4.) The proposed Warehouse and truck loading dock directly face a residential neighborhood. And, the warehouse itself will sit above Sierra College. Do noise studies and visual impact analyses consider effects on neighbors to the North? The position of the structure on the lot (above the street line and closest to existing residential neighbors), and the industrial nature of its function (4-7 20-foot truck pick-ups/deliveries a day and an 18-wheeler per week) will cause the most negative impacts to those residents (most with small children). Again, the area of Sierra College is predominantly residential, so noisy industrial activities will significantly impact quality of life.

5.) Furthermore, we, the neighbors most directly and negatively impacted by this development, were only recently made aware of this project and the availability of the Environmental Impact Report. While Mr. Cook did reach out to some of us, we were only able to meet with him 6 days prior to comment deadline. It has not been ample time to notify neighbors, understand the impact of the development and make comments. In fact this process has been stressful and a huge, unplanned, time commitment – but we feel it is critical to comment. It is possible that with more time to understand the project we would have additional concerns.

17-4

Thank you for your serious consideration,

The Favero's
6313 Galaxy Lane

The Lund
4654 Longview

The Beans
6409 Cosmos Court

Melody Gardner
6312 Galaxy Lane

Bob and Cindy Shannon
4507 Floradale Ct

The Ikeda's

Letter 17 Continued

4639 Longview Drive

LETTER 17: KIM ZERCIE, ET AL., AND RESIDENTS (SIERRA VIEW)

RESPONSE TO COMMENT 17-1

Traffic count data for Sierra College Boulevard used in the Draft EIR is comparable with current conditions that include conditions with the completion of the Interstate 80/Sierra College Boulevard interchange improvements. 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). The traffic model used for cumulative conditions does assume these interchange improvements are in place.

RESPONSE TO COMMENT 17-2

Draft EIR contains both an existing plus approved project conditions analysis that assumes development in the City of Rocklin (e.g., Rocklin Crossings) provided on Draft EIR pages 9-40 through 9-55, as well as a cumulative traffic impact analysis provided on Draft EIR pages 18-7 through 18-18.

RESPONSE TO COMMENT 17-3

Traffic impacts to the intersection of Rocklin Road and Sierra College Boulevard would be mitigated from Project traffic impacts through the construction of a second northbound left-turn lane on Sierra College Boulevard (mitigation measure 9-1). However, this facility is within the City of Rocklin's jurisdiction and the County cannot ensure that the improvement will be made. 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.

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.

Estimated truck trips were included in the traffic analysis in the Draft EIR and were also used in the noise analysis. Draft EIR pages 11-21 through -27. Truck noise issues were specifically

addressed on Draft EIR pages 11-22, -24 through -27, which included noise associated with truck braking, truck traffic, and operations at the loading dock. The Draft EIR identifies mitigation measures 11-1a through c to mitigate traffic and truck traffic noise impacts.

Since release of the Draft EIR, 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) and would further mitigate traffic impacts (including concerns regarding truck traffic) on intersections along Sierra College Boulevard. A detailed discussion of this improvement is provided in Chapter 1 (Introduction).

RESPONSE TO COMMENT 17-4

The Draft EIR includes both visual impact analysis (see Draft EIR pages 8-14 through -18) and noise analysis of the entire operation of the Project (including loading activities see Draft EIR pages 11-21 through -27). Building elevations and entry features that would be viewed from north of the site are provided in Draft EIR Chapter 3.0 (Project Description) in Figures 3-7a through 3-7f (as well in Draft EIR Figure 8-4a in Chapter 8.0, Visual Resources). The Project applicant has made modifications to the architectural design (façade treatment) of the proposed Resource Center Building in order to address neighbor concerns. No changes in the massing or size of this building are proposed. **Figure 1-3** illustrates this change to the proposed building design.

The commenter is referred Response to Comment 17-3 regarding further discussion of loading dock noise associated with truck use.

A public hearing will be held before the County Planning Commission prior to taking action on the Project where further public input and concerns may be provided to the County.



Letter 18
PLACER COUNTY
SHERIFF
CORONER-MARSHAL



MAIN OFFICE
2929 RICHARDSON DR.
AUBURN, CA 95603
PH: (530) 889-7800 FAX: (530) 889-7899

TAHOE SUBSTATION
DRAWER 1710
TAHOE CITY, CA 96145
PH: (530) 581-6300 FAX: (530) 681-6377

EDWARD N. BONNER
SHERIFF-CORONER-MARSHAL

DEVON BELL
UNDERSHERIFF

LAW ENFORCEMENT IMPACT REPORT
Prepared by the Placer County Sheriff's Department
WAYNE WOO/SOUTH PLACER SUBSTATION COMMANDER

- I. NAME OF PROJECT: Amazing Facts Ministry (PEIR 20080021), Draft EIR**
- II. LOCATION:** Bordered by Sierra College Blvd on the north between Nightwatch and Ride Park Drs. Abuts the City of Rocklin at Sierra College Blvd. along the north property line and extends south to Oak Hill Lane, Granite Bay, CA.
- III. AGENCIES/FIRM REQUESTING REPORT:**
Maywan Krach, Community Development Technician
Environmental Coordination Services
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603
- IV. COMMERCIAL:**
 - A. 1 major complex**
 - Phase I:** 106,800 sq ft multi-use building consisting of an auditorium/gymnasium, ministry offices, Sabbath school classrooms, a fireside chapel, an audio/visual production suite, kitchen facilities, and an 11,220 sq ft resource center building.
 - Phase II:** 90,000 sq ft multi-use building which will replace the Phase I multi-use building's function as the main sanctuary for this ministry and serve as the permanent worship facility with seating for 2,000 people.
 - Approx 625 on-site parking spaces would be provided as part of Phase I and an addition 275 parking space as part of Phase II, for a total of approx 900 spaces.*
 - B.**
- RESIDENTIAL**
 - A.**
 - B.**
- V. BUDGET IMPACT:**
 - A. Personnel (sworn)**
 - 1. At three (3) Deputy hours per week
(1 x 3 x 52) = 156 Deputy hours for field operations per year
 - 2. At two (2) Jail deputy hours per month
(1 x 2 x 12) = 24 Hours per year

18-1

Letter 18

Subject: Amazing Facts Church Project (APN 046-050-006 & -008) – Page 2

Total sworn hours per year: 180 @ \$77.73 per hour = \$ 13,991.00

B. Personnel (non-sworn)

- 1. Dispatch = 1 hour per year
- 2. Records = 1 hour per year
- 3. Clerical = 1 hour per year

Total support personnel hrs year: 3 @ \$50.07 per hour = \$ 150.00

C. Equipment

Vehicles, gasoline, maintenance, printing, weaponry, training, jail buildings
(sworn amt. + support amt. / 3) = \$ 4,714.00

VI. ANNUAL BUDGET INCREASE

Sworn Personnel	\$ 13,991.00
Support Personnel	\$ 150.00
Equipment, etc.	<u>\$ 4,714.00</u>

TOTAL PER YEAR \$ 18,855.00

VII. SPECIAL PROBLEMS: none noted at this time.

VIII. RECOMMENDATIONS: Many of the potential crime problems dealing with circulation systems and structures may be reduced by utilizing the concepts of "Crime Prevention Through Environmental Design" (CPTED). By working closely with law enforcement during all stages of this development, design features that encourage criminal activity can be identified and solutions found to mitigate problem designs.

IX. WILL SERVE:

The Placer County Sheriff's Department's ability to handle law enforcement needs generated by this development are dependant on the Board of Supervisors authorizing funding equivalent to the needs mentioned in this report. Without the additional personnel, equipment, etc., appropriate service will be severely impaired.

**EDWARD N. BONNER
SHERIFF/CORONER/MARSHAL**

prepared by: A. Rogers/Crime Prevention
Placer County Sheriff/Auburn Justice Center
(530) 889-6922 9/14/11

**18-1
cont.**

LETTER 18: A. ROGERS, PLACER COUNTY SHERIFF'S DEPARTMENT

RESPONSE TO COMMENT 18-1

This comment identifies service demands anticipated by the Project. No physical impacts to the environment are expected as a result of the Sheriff Department providing these services to the Project.

Letter 19



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

March 28, 2012

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

Subject: Amazing Facts Ministry Project

Dear Ms. Krach:

Thank you for the opportunity to consult on the above referenced project. I am writing on behalf of the members of the United Auburn Indian Community (UAIC) to oppose the adoption of the proposed permit if further information is not provided in the environmental reports. The UAIC has reviewed the *Amazing Facts Ministry, Draft Environmental Impact Report (DEIR)*, as well as Peak & Associates, Inc. cultural reports titled *Cultural Resources Assessment for the Amazing Facts Property, Placer County, California (2007)*, *Determination of Eligibility and Effect for the Amazing Facts Project Area, Placer County, California (2009)* and *Amazing Facts Property, DPR Forms (2011)*. Based on our review, the UAIC has further archaeological concerns for this project. Upon review, it is reasonable to conclude that the project will result in the alteration of or adverse effect to significant Native American archaeological or historical [REDACTED] sites, structures, objects, or buildings. Furthermore, the project has the potential to cause a permanent physical change to unique and non-renewable cultural resources [REDACTED]

19-1

After having reviewed the *Amazing Facts Ministry, Draft Environmental Impact Report (DEIR)*, prepared by Placer County, and cultural reports titled *Cultural Resources Assessment for the Amazing Facts Property, Placer County, California (2007)*, *Determination of Eligibility and Effect for the Amazing Facts Project Area, Placer County, California (2009)* and *Amazing Facts Property, DPR Forms (2011)* prepared by Peak & Associates, Inc. the UAIC's comments are as follows:

- The reports do not accurately describe all of the cultural resources present within the project;
- In the 2011 report seven sites were identified. Six were considered prehistoric. They include Site's 1, 3, 4, 5, 6 and 7. These sites are in close proximity and actually correspond to one major multicomponent village site [REDACTED]
- Previous to the 2011 report, no resources had been reported or documented by Peak & Associates. To date none of this information has been submitted to the California Historical Resources Information System for listing.

19-2

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

Letter 19 Continued

- We contend that the State Historic Preservation Officer will not concur with these findings, since they do not meet professional standards. In order to meet professional standards, we recommend a complete and accurate survey and inventory report completed for the 72 acres and a formal excavation report drafted documenting all ground disturbing activities completed in the past or in the future.
- [REDACTED]
[REDACTED] This is an adverse effect to the entire site, especially Feature 1 (referred to by Peak as Site 1), and will require further consultation and mitigation.
- The UAIC believes all six prehistoric sites are potentially eligible under Criteria C and D.
- [REDACTED] Numerous sites have been recorded in this landscape, therefore the likelihood of either site to yield potentially significant information under Criterion D should be considered highly sensitive. [REDACTED]
[REDACTED]
- [REDACTED] The ethnographic and subsurface potential need to be addressed and should therefore be considered potentially eligible for the under Criteria C and D.

19-2

Archaeological survey and excavation reports were required and conducted for the project. These reports should have recommended specific measures to mitigate the significant effects. However the reports failed to accurately record the survey and excavation findings conducted by Peak & Associates, Peak & Associates 2007, 2009 and 2011 reports should have made recommendations for mitigation measures or alternatives, as well as curation of any excavated objects to be discussed in the EIR for the project. In order for the project to be approved on the basis of an EIR, the County must adopt a mitigation monitoring and reporting program as required under Section 21081.6. We further request a Memorandum of Agreement to help lay out the terms and conditions of a Historic Resources Treatment Plan (HRTP) that should be required as a result of adverse impacts to significant historic resources.

19-3

When archaeological resources are involved, avoidance or preservation in an undisturbed state is the preferable course of action. Section 21083.2 provides that preservation methods may include:

- Planning construction to avoid archaeological sites;
- Deeding sites into permanent conservation easements;
- Capping or covering sites with a layer of soil before building on the sites;
- Planning parks, greenspace, or other open space to incorporate archaeological sites. If a mitigation bank or environmental easement is chosen the UAIC would like the opportunity to hold the easement and would recommend native plants and resources to be considered in any restoration effort. The UAIC also welcomes restoration and mitigation bank opportunities and programs on Tribal lands.

19-4

Peak & Associates is recommending the testing and excavations they conducted as avoidance, yet no formal or professional report has been produced. Furthermore excavations were conducted without any research design. All of this information must be documented in the EIR prior to approval. Therefore the current reports do not meet professional standards or comply with the CEQA or NEPA requirements.

19-5

Section 21081.6 requires a public agency to adopt a mitigation monitoring and reporting program whenever it makes a finding of significance under subdivision (a) of Section 21081 (also *CEQA*

19-6

Letter 19 Continued

Guidelines Section 15091(a)(1)). This clearly applies to any EIR which identifies adverse effects or potentially adverse effects on unique archaeological resources or historical resources.

**19-6
cont.**

UAIC is requesting all relevant cultural materials from prehistoric sites where excavation and data recovery has been performed and, in addition, is interested in receiving the following information developed in preparation for the Amazing Facts Ministry project area:

- Copies of environmental documents and notices for proposed future projects;
- Any additional confidential cultural and archaeological reports.

19-7

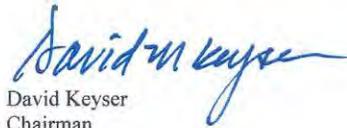
In addition, UAIC would like the opportunity to provide tribal representatives to monitor projects if excavation and data recovery are required for prehistoric cultural areas or in cases where disturbance is proposed at or near sensitive cultural resources.

For these reasons, the United Auburn Indian Community opposes the proposed DEIR until the Peak & Associates, Inc. reports are written to professional standards and legal requirements. We also recommend the development of a program that mitigates all of the significant environmental impacts to cultural resources. We strongly recommend that this program include a MOA, HRTF and monitoring of all testing and excavation by tribal representatives.

19-8

Thank you again for the opportunity to consult on this project. Please contact Marcos Guerrero, cultural resources specialist, at (530) 883-2364 or email at mguerrero@auburnrancheria.com if you have any questions.

Sincerely,



David Keyser
Chairman

CC: Marcos Guerrero, THPO

LETTER 19: DAVID KEYSER, UNITED AUBURN INDIAN COMMUNITY OF THE AUBURN RANCHERIA

Note – Portions of Comment Letter 19 have been redacted to protect cultural resources on the Project site.

RESPONSE TO COMMENT 19-1

Comment noted. Since receipt of the United Auburn Indian Community (UAIC) September 26, 2011 comment letter on the DEIR, County staff and UAIC tribal representatives have been further discussing concerns regarding the Project. The Project applicant and Peak & Associates (cultural resources consultant for the Project) met with UAIC tribal representatives on April 6, 2012. It is the County understands that the participants at that meeting agreed that the DEIR and 2009 Cultural Report contained sufficient information for CEQA purposes, and that the parties will work together in advance of the federal Section 106 process, assuming that the project proceeds forward. Peak & Associates also met with UAIC tribal representatives in the field on April 13, 2012 for field verification purposes. The project's potential for impacts to potentially impacted cultural resources are disclosed in the DEIR. Minor, non substantive clarifications and minor changes to the mitigation requirements are set forth in the revisions to DEIR Chapter 7 in the FEIR (see Chapter 2.0 of this document).

RESPONSE TO COMMENT 19-2

Comment noted. The following responses are bulleted to correspond to the bullets on the comment letter and also refer to **Appendix B** (Peak & Associates April 19, 2012 Correspondence).

- The confidential reports on file with the County accurately describe the cultural resources on the 74 acre Project site and the proximity of the same to the 17 acre proposed Project. As reflected in the 2009 report and the DEIR, one cultural resource lies adjacent to the proposed Project. The 2009 report and 2011 Confidential DPR 523 site form accurately describe this site. See also **Appendix B** (item A).
- While the commenter suggests that the evidence supports the conclusion that this site is part of a larger single complex, tests were performed, and in the professional opinion of Peak & Associates, the tests support the conclusion that the site is not part of a multi-component village site or complex. See also **Appendix B** (item B).
- The site forms will be submitted to the California Resources Information System. See also **Appendix B** (item D).
- While this comment does not pertain to the adequacy of the DEIR, it is Peak & Associates' professional opinion that the State Historic Officer will concur with the findings, as the material to be submitted has been documented and will be submitted pursuant to the professional standards required in this process. See also **Appendix B** (item E).
- The data collected and analyzed by Peak & Associates indicates that one site is adjacent to, but not within what would be considered the proposed Project's anticipated area of potential effect (APE). The area east of Site 1 appears to have been impacted during grading work completed in the late 1960's. Nonetheless, there is no work proposed east

of this site for the proposed Project, access will be limited from the north end only, and additional orange fencing shall be installed along both sides of the proposed spillway construction area to further limit any potential impacts. The area where a single basalt flake was found will be avoided during construction of the proposed Project, as the construction will be located within the area of previous impact, and does not cross between Locus A and B. See also **Appendix B** (item F).

- While this comment does not pertain to the adequacy of the DEIR, Peak & Associates believes that only two sites (1A and 6) are potentially eligible under Criteria C and D. However, all sites will be evaluated as part of the federal Section 106 process.

RESPONSE TO COMMENT 19-3

The DEIR includes the mitigation measures recommended by Peak & Associates. The measures in the DEIR, including curation of recovered artifacts, have been clarified in the revised DEIR Chapter 7 (see Chapter 2.0 of this document). The Mitigation Monitoring and Reporting Plan (MMRP) can be found in Chapter 4.0 of the FEIR. If the proposed Project is approved, one of the actions for said approval will be the adoption of the MMRP. The commenter also suggests that the EIR include a Historic Resources Treatment Plan mitigation. This is not a comment on the adequacy of the EIR, but pertains to the later federal Section 106 process. See also **Appendix B** (item F and G).

RESPONSE TO COMMENT 19-4

The first three measures are reflected in the Draft and Final EIR (see Chapter 2.0 of this document). An easement is an alternative tool for mitigating impacts. The Draft and Final EIR both conclude that the impacts are mitigated to a less than significant level.

RESPONSE TO COMMENT 19-5

Peak & Associates did submit a formal report and site forms to Placer County for review. CEQA requires that the County maintain the confidentiality of such reports and to summarize the findings in the analysis. The second phase subsurface tests completed to determine the extent of subsurface artifacts (site boundary definition testing program) and the subsequent test excavation at Site 1 were conducted and summarized in the 2009 DOEE and 2011 Confidential DPR form update. The other sites were not included as they are not adjacent to, or likely to be impacted by, the proposed Project. It is the opinion of the EIR preparers (PMC) that the reports and site forms meet professional standards and are adequate for purposes of analyzing the cultural resources and potential impacts of the Proposed Project under CEQA.

RESPONSE TO COMMENT 19-6

The Mitigation and Monitoring Program is included in Chapter 4 of the FEIR. See Response to Comment 19-3.

RESPONSE TO COMMENT 19-7

The commenter expressed an interest in the artifacts. Artifacts collected during the excavation are currently stored at Peak & Associates' office. At the direction of the property owner, the artifacts will be placed in accordance with the proposed Historic Properties Management Plan (HPMP), as required as part of the Section 106 process. Placer County has the understanding that if UAIC

has a storage facility which meets federal standards necessary to maintain the collections, the property owner will be provided with that information as a storage option. See also **Appendix B** (item J). It should be noted that artifacts identified on the site do not alter the conclusions of the EIR regarding impacts to cultural resources.

Peak & Associates will provide copies of all confidential cultural and archeological reports to UAIC and other concerned Native American groups as part of the federal permitting process.

The commenter offered the availability of tribal monitors. This information has been incorporated into the mitigation measures in the Final EIR (see Chapter 4.0 of this document).

RESPONSE TO COMMENT 19-8

Comment noted. This comment restates the positions made in comments 19-1 through 19-7. The reader is referred to the corresponding responses.

SUMMARY OF COMMENTS RECEIVED AT THE PLACER COUNTY PLANNING COMMISSION MEETING OCTOBER 13, 2011

COMMENTS FROM JANE NEGRI

The Project is not consistent with the Granite Bay Community Plan (noted Goal 1) and mitigation measures do not mitigate this issue. The proposed Project does not protect the rural character or zoning of the area. The main objection is the Project's world-wide mission of reaching people outside of the area. This Project belongs in a commercial area. Impacts to the community area have not been addressed (e.g., tree loss, greenhouse gases).

RESPONSE TO COMMENT

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 houses of worship (Bayside Church) as well as how the Project is an allowable use in the F-B-X zoning district with the issuance of a minor use permit. No significant land use conflicts were identified in the Draft EIR that would require mitigation.

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).

The Draft EIR also provides an analysis that the proposed Project would be generally consistent with the policy provisions of the Granite Bay Community Plan (see Draft EIR pages 4-23 through -25 and 8-9 through -12 of the Draft EIR associated with land use compatibility and character). While it is acknowledged that the Project would be an intensive land use for the proposed development area of the site along Sierra College Boulevard, 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). As identified in Draft EIR pages 4-27 and -28, no land use impacts would occur from the implementation of the Project.

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.

The Draft EIR page 3-11 does identify the following project objective associated with their worldwide mission:

Develop the Amazing Facts house of worship facility and offices to accommodate the multifaceted ministry that supports their local and worldwide mission;

However, it is common for houses of worship and associated religions to have identified objectives (e.g., charity, assistance with other congregations, etc.) that reach beyond the local community. 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 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.

The Draft EIR identifies that several impacts (including tree removal) can be mitigated to a less than significant level, but does acknowledge impacts associated with visual resources (project and cumulative), traffic (project and cumulative), and cumulative air quality cannot be mitigated to a less than significant level (see Draft EIR page 18-30). As identified in Response to Comment 5-7, an additional mitigation measure has been included requiring the purchasing carbon offset credits that are verified and registered with the Climate Action Reserve that would now mitigate this impact to less than significant.

Since release of the Draft EIR, 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) and would further mitigate traffic impacts on intersections along Sierra College Boulevard. A detailed discussion of this improvement is provided in Chapter 1 (Introduction).

The commenter's statements with respect to the Granite Bay Community Plan will be forwarded to the decision-makers for their consideration.

COMMENTS FROM SANDY HARRIS

The commenter submitted written comments that are provided in Letter 13 in this document.

The Project conflicts with the Granite Bay Community Plan because of its worldwide mission and the EIR does not address these concerns. The commenter cited policies from the Granite Bay Community Plan with which the Project is in conflict. The EIR did not address Granite Bay Community Association Notice of Preparation comments.

RESPONSE TO COMMENT

The Draft EIR identifies that several impacts can be mitigated to a less than significant level, but does acknowledge impacts associated with visual resources (project and cumulative), traffic (project and cumulative), and cumulative air quality cannot be mitigated to a less than significant level (see Draft EIR page 18-30).

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 houses of worship (Bayside Church) as well as how the Project is an allowable use in the F-B-X zoning district with the issuance of a minor use permit. No significant land use conflicts were identified in the Draft EIR that would require mitigation.

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).

The Draft EIR also provides an analysis that the proposed Project would be generally consistent with the policy provisions of the Granite Bay Community Plan, including policies applicable to the Project identified in the Granite Bay Community Association February 28, 2009, correspondence (see pages 4-23 through -25 and 8-9 through -12 of the Draft EIR). While it is acknowledged that the Project would be an intensive land use for the proposed development area of the site along Sierra College Boulevard, 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).

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.

The Draft EIR page 3-11 does identify the following project objective associated with their worldwide mission:

Develop the Amazing Facts house of worship facility and offices to accommodate the multifaceted ministry that supports their local and worldwide mission;

However, it is common for houses of worship and associated religions to have identified objectives (e.g., charity, assistance with other congregations, etc.) that reach beyond the local community. 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 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.

The commenter's statements with respect to the Granite Bay Community Plan will be forwarded to the decision-makers for their consideration.

COMMENTS FROM DAKSHA SHAH

The Project's size and magnitude do not match the rural community. Ms. Shah resides behind the site and is concerned about its impact on them. If approved, Ms. Shah would like to be contacted one-on-one to discuss concerns such as traffic and safety.

RESPONSE TO COMMENT

Draft EIR Chapter 8.0 (Visual Resources) provides an extensive visual analysis and visual simulations associated with views south of the Project site, which identified that the Project would have a significant visual impact that cannot be fully mitigated. Draft EIR Chapter 9.0 (Traffic and Circulation) addresses traffic operational impacts. No significant traffic safety impacts were identified.

Prior to the Planning Commission meeting, the applicant's representative had invited residents of multiple adjacent neighborhoods to a series of small meetings where the Project was presented. Ms. Shah's husband attended one of the meetings, hosted for their particular neighborhood the week following the Planning Commission meeting which included a PowerPoint presentation for the Project. Their questions regarding the Project were related to landscape screening and fencing along the common property line of their home and the Project. The Project applicant has agreed to coordinate with the Shahs during preparation of improvement plans to insure their concerns are met. The Shahs also requested, and were provided with, a copy of the Project traffic study. They have not contacted the Project applicant with any questions or comments since that meeting.