

4.0 COMMENTS AND RESPONSES

This section contains the comment letters that were received on the Draft EIR. Following each comment letter is a response by the County intended to either supplement, clarify, or amend information provided in the Draft EIR and, or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues may be discussed or noted for the record. Where text changes in the Draft EIR are warranted based upon comments on the Draft EIR, those changes are generally included following the response to comment. However, in some cases when the text change is extensive, the reader is instead referred to Chapter 2, Text Changes, where all the text changes can be found.



Department of Toxic Substances Control



Linda S. Adams
Secretary for
Environmental Protection

Maureen F. Gorsen, Director
1011 North Grandview Avenue
Glendale, California 91201



Arnold Schwarzenegger
Governor

January 23, 2008

Ms. Maywan Krach (cdraecs@placer.ca.gov)
Placer County Planning Department
3091 County Center Drive, Suite 140
Auburn, California 95603

DRAFT ENVIRONMENTAL IMPACT REPORT FOR REGIONAL UNIVERSITY
SPECIFIC PLAN, CITY OF ROSEVILLE, PLACER COUNTY, CALIFORNIA
(SCH 2005032026)

Dear Ms. Krach:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (DEIR), dated December 10, 2007, for the subject project. The due date to submit comments is January 23, 2008. Based on a review of the DEIR, DTSC would like to provide the following comment:

1. The project includes development of a University campus and mixed-use Community on approximately 1,157.5 acres of land. 1-1
2. Since the site area has been used for agricultural purposes, pesticides (e.g., DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the "Interim Guidance for Sampling Agricultural Soils (Second Revision), dated August 2002." This Guidance should be followed for sampling agricultural properties where development is anticipated. 1-2
3. Several pole-mounted electrical transformers are located on the site. Potential impacts from these transformers should be investigated. It is recommended that PCB samples be collected and analyzed in accordance with DTSC's "Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006." 1-3

4. Pursuant to DTSC's "Interim Guidance – Naturally Occurring Asbestos (NOA) at School Sites, Revised September 24, 2004," further action, such as completion of a Preliminary Endangerment Assessment (PEA), should be conducted to determine whether a naturally occurring hazardous material (e.g., NOA) is present, based on reasonably available information about the property and the area in its vicinity. The PEA should be conducted as part of the California Environmental Quality Act (CEQA) process and prior to any approval or adoption of an EIR for the project. 1-4

5. If demolition of old structures will occur, lead based paint and organochlorine pesticides from termiticide applications may be potential environmental concerns at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers, dated June 9, 2006."* 1-5

If you would like to discuss this matter further, please contact me at (818) 551-2860.

Sincerely,



Ken Chiang
Senior Hazardous Substances Scientist
School Program and Engineering/Geology Support Division

cc: State Clearinghouse (State.clearinghouse@opr.ca.gov)
Office of Planning and Research

Emma Gill (ELGill@pbsj.com)
PBS&J

Julie Hanson (Julie@KTCommunities.com)
KT Development Corporation

Guenther W. Moskat (Gmoskat@dtsc.ca.gov)
CEQA Tracking Center – Sacramento

SPEGSD Reading File - Glendale

CEQA Reading File – Glendale

LETTER 1: DEPARTMENT OF TOXIC SUBSTANCES CONTROL, KEN CHIANG**Response to Comment 1-1**

The description of the basic project land uses and acreage is correct.

Response to Comment 1-2

The Draft EIR includes mitigation measures in Section 6.7, Hazards to ensure that any known hazards due to past use of the site are cleaned up or remediated prior to site preparation/grading activities. If any evidence of soil contamination or other hazards is discovered during site preparation and construction that appropriate controls are implemented to ensure the risk to people and the environment from hazardous materials or wastes are minimized. Mitigation Measure 6.7-3(d) on pages 6.7-22 and 6.7-23 of the Draft EIR requires that properties not previously evaluated with a current Phase I Environmental Site Assessment may be required to complete a Phase I Environmental Site Assessment, as determined by the County's Environmental Health Services. If past commercial agricultural uses are disclosed that could have resulted in persistent contamination, soil sampling shall be conducted within former commercial agriculture areas. In these instances, prior to setting conditions for subdivision development, a soil investigation shall be conducted according to guidelines developed by the California Department of Toxic Substances Control (DTSC) and contained in the DTSC August 2002 *Interim Guidance for Sampling Agricultural Fields for School Sites*, or equivalent protocol. Any necessary contaminate remediation will be required to meet State and County regulations and be completed prior to recordation of the final small lot subdivision map or equivalent final Placer County approval for residential projects. Mitigation Measure 6.7-3(d) requires that risk assessments include a DTSC Preliminary Endangerment Assessment or no further action determination, or equivalent, and that the risk assessment be completed prior to approval of improvement plans or equivalent approval.

Response to Comment 1-3

The comment requests that the project include testing to determine if soil contamination has occurred from transformers on the project site and recommends analysis consistent with DTSC's guidance. As discussed in the Hazards Section of the Draft EIR (pages 6.7-4 and 6.7-5), it is not known at this time if any of the transformers on the site contain polychlorinated biphenyls (PCBs). However, as discussed in Chapter 2, Project Description, of the Draft EIR (see page 2-51), the applicant for each subsequent project proposed within the Specific Plan area is required to complete a Subsequent Conformity Review Questionnaire and additional information, including Hazards/Past Uses Studies, which could include Phase I Environmental Site Assessments, Phase 2 limited soils investigation, and/or Preliminary Endangerment Assessments. Based upon the findings of these studies, the County Environmental Health Services Department (EHS) will determine if additional investigation, such as the recommended PCB investigation is warranted.

Response to Comment 1-4

The comment suggests that the project site be analyzed to determine if naturally occurring asbestos (NOA) is present, "based upon reasonably available information about the property and the area in its vicinity". According to the Department of Conservation, California Geological Survey *Special Report 190: The Relative Likelihood for the Presence of Naturally Occurring Asbestos (NOA) in*

Placer County,¹ the entire area of Regional University is identified as an area "Least likely to contain NOA." This is the lowest level of concern identified by the survey.

Areas defined as "least likely to contain NOA" contain one or more of the following rock types: metamorphosed sedimentary rocks, metamorphosed non-mafic volcanic rocks, granitic rocks, volcanic rocks, alluvium, and glacial deposits. Geologic units in Placer County comprised partly or entirely of one or more of the metamorphic rock types include the Colfax sequence (Fiddle Creek Complex), Calaveras Complex, Shoo Fly Complex, Sailor Canyon Formation, Sierra Buttes Formation, Peale Formation, and Lake Tahoe sequence. The granitic rocks include the Rocklin and Penryn plutons.

The technical documents reviewed during compilation of the map did not indicate the presence of NOA in any of the above rock types within Placer County. The mineral actinolite has been reported at a few localities in the metamorphosed sedimentary rocks, but whether it is asbestos was not reported; in general, non-asbestiform actinolite is much more common than actinolite asbestos in the Sierra Nevada. According to the report, the relative likelihood for the presence of NOA in these areas is lower than that areas identified as "most likely" or "moderately likely" to contain NOA. The report also noted that although small bodies of rock or soil with moderate or higher likelihood for the presence of NOA may occur within some of these areas, those areas remain undiscovered or are too small to depict on the map. Based upon this information, the risk associated with exposure to NOA would not be substantial and the County's Environmental Health Services would not request further evaluation of possible NOA contamination within the RUSP area.

Response to Comment 1-5

There are no structures on the project site, and no structures would be demolished as part of the proposed project. Therefore, the recommendations in the comment would not be required.

1 Department of Conservation, California Geological Survey. <www.consrv.ca.gov/cgs/information/publications/sr/Documents/Placer_County_SR190.pdf>

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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ENVIRONMENTAL COORDINATION SERVICES

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PLANNING DEPT.



January 17, 2008

Maywan Krach
Placer County Planning Department
3091 County Center Drive
Auburn, CA 95603

RE: regional University Specific Plan, SCH# 2005032026

Dear Ms. Krach:

As the state agency responsible for rail safety within California, we recommend that this development project planned in the County be planned with the safety of the rail corridor located to the west in Sutter County in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings.

Although this project appears to have been designed to minimize the access of traffic to the west, we have concerns with the cumulative impact from increased traffic from the numerous large developments occurring in the area on the existing at-grade highway-rail crossings on Riego and Sankey Roads in Sutter County.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles
Environmental Specialist
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Terrel Anderson, Union Pacific Railroad

2-1

LETTER 2: PUBLIC UTILITIES COMMISSION, KEVIN BOLES

Response to Comment 2-1

The comment expresses concern regarding the effect of increased traffic, specifically cumulative traffic from the proposed project as well as other new development in the area on the existing at-grade highway-rail crossings on Riego and Sankey Roads in Sutter County. The rail crossing identified has warning lights and crossing gates, which would be used to keep the tracks clear of vehicles when trains come. These features can be coordinated with the signals at the nearest intersection to ensure that there is time for the intersection and tracks to clear before a train passes. No active railroad routes border or cross the Plan Area, nor is an active rail line within active walking distance of the Plan Area. Therefore, the proposed project would not substantially increase pedestrian crossings of a rail line.

Offsite utilities and roadway improvements could be constructed within existing railroad rights-of-way. The comment states that safety improvements should be considered when approval is sought for new development, and that working with Commission staff early in the conceptual design phase would improve safety to motorists and pedestrians. The rail line nearest the project site is in Sutter County, so Placer County has no jurisdiction over design of the roadway or rail crossing. The PUC must issue a permit for any modification at any grade crossing under Public Utilities Code Sections 201-1205. Therefore, any required modifications to the at-grade crossing would require approval from the PUC. The owners of any affected railroad rights-of-way would be contacted and advised of any activity that could affect their ownership or operations. All steps would be taken during construction to protect the safety of motorists and pedestrians in accordance with standard practices of the railroad and the County.

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 942360001
(916) 653-5791



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ENVIRONMENTAL COORDINATION SERVICES

January 7, 2008

Maywan Krach
Placer County Planning Department
3091 County Center Drive
Auburn, California 95603

Regional University Specific Plan (PEIR T20050187)
State Clearinghouse (SCH) Number: 2005032026

The project corresponding to the subject SCH identification number has come to our attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at <http://recbd.ca.gov/>. Please be advised that your county office also has copies of the Board's designated floodways for your review. If indeed your project encroaches on an adopted food control plan, you will need to obtain an encroachment permit from the Reclamation Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires the securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly.

3-1

If after careful evaluation, it is your assessment that your project is not within the authority of the Reclamation Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Huitt".

Christopher Huitt
Staff Environmental Scientist
Floodway Protection Section

Enclosure

cc: Governor's Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Encroachment Permits Fact Sheet

Basis for Authority

State law (Water Code Sections 8534, 8608, 8609, and 8710 – 8723) tasks the Reclamation Board with enforcing appropriate standards for the construction, maintenance, and protection of adopted flood control plans. Regulations implementing these directives are found in California Code of Regulations (CCR) Title 23, Division 1.

Area of Reclamation Board Jurisdiction

The adopted plan of flood control under the jurisdiction and authority of the Reclamation Board includes the Sacramento and San Joaquin Rivers and their tributaries and distributaries and the designated floodways.

Streams regulated by the Reclamation Board can be found in Title 23 Section 112. Information on designated floodways can be found on the Reclamation Board's website at http://recbd.ca.gov/designated_floodway/ and CCR Title 23 Sections 101 - 107.

Regulatory Process

The Reclamation Board ensures the integrity of the flood control system through a permit process (Water Code Section 8710). A permit must be obtained prior to initiating any activity, including excavation and construction, removal or planting of landscaping within floodways, levees, and 10 feet landward of the landside levee toes. Additionally, activities located outside of the adopted plan of flood control but which may foreseeable interfere with the functioning or operation of the plan of flood control is also subject to a permit of the Reclamation Board.

Details regarding the permitting process and the regulations can be found on the Reclamation Board's website at <http://recbd.ca.gov/> under "Frequently Asked Questions" and "Regulations," respectively. The application form and the accompanying environmental questionnaire can be found on the Reclamation Board's website at <http://recbd.ca.gov/forms.cfm>.

Application Review Process

Applications when deemed complete will undergo technical and environmental review by Reclamation Board and/or Department of Water Resources staff.

Technical Review

A technical review is conducted of the application to ensure consistency with the regulatory standards designed to ensure the function and structural integrity of the adopted plan of flood control for the protection of public welfare and safety. Standards and permitted uses of designated floodways are found in CCR Title 23 Sections 107 and Article 8 (Sections 111 to 137). The permit contains 12 standard conditions and additional special conditions may be placed on the permit as the situation warrants. Special conditions, for example, may include mitigation for the hydraulic impacts of the project by reducing or eliminating the additional flood risk to third parties that may caused by the project.

Additional information may be requested in support of the technical review of

your application pursuant to CCR Title 23 Section 8(b)(4). This information may include but not limited to geotechnical exploration, soil testing, hydraulic or sediment transport studies, and other analyses may be required at any time prior to a determination on the application.

Environmental Review

A determination on an encroachment application is a discretionary action by the Reclamation Board and its staff and subject to the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.). Additional environmental considerations are placed on the issuance of the encroachment permit by Water Code Section 8608 and the corresponding implementing regulations (California Code of Regulations – CCR Title 23 Sections 10 and 16).

In most cases, the Reclamation Board will be assuming the role of a “responsible agency” within the meaning of CEQA. In these situations, the application must include a certified CEQA document by the “lead agency” [CCR Title 23 Section 8(b)(2)]. We emphasize that such a document must include within its project description and environmental assessment of the activities for which are being considered under the permit.

Encroachment applications will also undergo a review by an interagency Environmental Review Committee (ERC) pursuant to CCR Title 23 Section 10. Review of your application will be facilitated by providing as much additional environmental information as pertinent and available to the applicant at the time of submission of the encroachment application.

These additional documentations may include the following documentation:

- California Department of Fish and Game Streambed Alteration Notification (<http://www.dfg.ca.gov/1600/>),
- Clean Water Act Section 404 applications, and Rivers and Harbors Section 10 application (US Army Corp of Engineers),
- Clean Water Act Section 401 Water Quality Certification, and
- corresponding determinations by the respective regulatory agencies to the aforementioned applications, including Biological Opinions, if available at the time of submission of your application.

The submission of this information, if pertinent to your application, will expedite review and prevent overlapping requirements. This information should be made available as a supplement to your application as it becomes available. Transmittal information should reference the application number provided by the Reclamation Board.

In some limited situations, such as for minor projects, there may be no other agency with approval authority over the project, other than the encroachment permit by Reclamation Board. In these limited instances, the Reclamation Board

may choose to serve as the "lead agency" within the meaning of CEQA and in most cases the projects are of such a nature that a categorical or statutory exemption will apply. The Reclamation Board cannot invest staff resources to prepare complex environmental documentation.

Additional information may be requested in support of the environmental review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include biological surveys or other environmental surveys and may be required at anytime prior to a determination on the application.

LETTER 3: DEPARTMENT OF WATER RESOURCES

Response to Comment 3-1

Comment noted. Pursuant to California Code of Regulations, Title 23, and the Designated Floodway Maps cited in the comment and available at the Reclamation Board website, the proposed project falls outside the Dry Creek Designated Floodway. The designated floodway is approximately 3 miles south of the project site. Therefore, the proposed project does not encroach on the State Adopted Plan of Flood Control.

1 530 823 4884 P.02
 PLACER COUNTY WATER AGENCY
LETTER 4
 BOARD OF DIRECTORS BUSINESS CENTER
 Gray Allen, District 1 144 Ferguson Road
 Alex Ferreira, District 2 MAIL
 Lowell Jarvis, District 3 P.O. Box 6570
 Mike Lee, District 4 Auburn, CA 95604
 Otis Wollan, District 5 PHONE
 530.823.4850
 David Breninger, General Manager 800.464.0030
 Ed Tiedemann, General Counsel
 WWW.PCWA.NET



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

Subject: Agency Comments on the Draft Environmental Impact Report for the Regional University Specific Plan (SCH #2005032026)

Dear Ms. Krach:

We have reviewed the Draft Environmental Impact Report (DEIR) for the Regional University Specific Plan and have the following comments.

The DEIR should emphasize that annexation by the Agency Board of Directors is a prerequisite to receiving service. The need for annexation should be mentioned in the first paragraph under Water Supply and Distribution System (Page 2-28), on page 2-48 where Required Permits and Approvals are identified, and in the analysis in section 6-14.

4-1

Page 2-28 (Water Supply and Distribution System, second paragraph) states that PCWA could rely upon groundwater until such time that the surface water infrastructure is in place. PCWA does not currently have the capability to supply groundwater to the Project area and does not support development of the groundwater resources as the first and primary water source for the area. Utilization of the various water supply sources after development will be at the discretion of PCWA.

4-2

Mitigation measure 6.14-1 a) states that the County shall comply with Government Code section 66473.7. This section of the Government Code requires analysis which has already been performed. The mitigation measure should be amended to state that the developer will be required to provide all onsite and offsite water pipelines and facilities required to deliver potable water to and throughout the project area, as identified in the analysis.

4-3

Mitigation measure 6.14-1 c) and d) should be rephrased to eliminate the appearance of obligating PCWA to be responsible for its completion. We suggest, instead of '(PCWA) shall perform...' that the text says 'Developer shall perform an analysis to the satisfaction of the water purveyor...'

4-4

We appreciate the opportunity to comment on this Draft EIR. Should you have any questions, please contact Leslie Gault or Tony Firenzi of my staff at (530) 823-4886.

Sincerely,

R. Brent Smith, P.E.
 Deputy Director of Technical Services

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RBS:LG:vf

z:/EngFiles/WA/regional.univ.specific.plan.deir

W A T E R . E N E R G Y . S T E W A R D S H I P .

LETTER 4: PLACER COUNTY WATER AGENCY, BRENT SMITH

Response to Comment 4-1

The comment states that the need for annexation by the Placer County Water Agency (PCWA) would be required prior to the project receiving service and that this needs to be mentioned in the Draft EIR. This information is already included in the Draft EIR on page 6.14-2, which states “the project will need to request and be annexed to the Agency’s Zone 1 and detached from Zone 5 as a condition of service.”

PCWA is the authorized treated water purveyor for the unincorporated portion of Placer County in which the RUSP is located; the annexation application will be processed solely by PCWA and its Board of Directors. The annexation process is not required to be considered by any other Placer County agency or LAFCO.

This issue is addressed in PCWA Master Facilities Agreement, No. 2330, between PCWA and KT Communities, the project applicant. Section 9 of the agreement states:

9. Annexation to Agency Zone: Within 90 days of certification of environmental documentation the Applicant shall submit an application with all applicable fees for annexation of the Service Area to the Agency’s Zone No. 1 and the Agency shall process the application in an expeditious manner.

The applicant, as required by Section 9, will submit an application for annexation within 90 days of certification of environmental documentation.

Response to Comment 4-2

In response to the Water Supply and Distribution System text that states “PCWA would meet potable water requirements, both initially and at build out, using surface water supplemented by groundwater in dry and critical years; however, PCWA could rely upon groundwater until such time that surface water infrastructure is in place,” the commenter states that PCWA does not currently have the capability to supply groundwater to the Project Area, does not support development of the groundwater resources as the first and primary water source for the area, and utilization of the various water supply sources after development will be at the discretion of PCWA.

The water needs of the RUSP will be met using a supply strategy that integrates surface water, recycled water, and a redundant groundwater supply. Potable water requirements will be met using surface water supplemented by groundwater in periods of drought, emergency, or normal maintenance. Non-potable irrigation requirements will be met using recycled water supplemented by other water sources during peak irrigation demand months.

As a condition of providing treated water service to the RUSP, the Placer County Water Agency will require the developer of the RUSP to design and construct certain water infrastructure. The required facilities are identified in Section 5 of PCWA Master Facilities Agreement, No. 2330, between PCWA and KT Communities. This section states:

5. Facilities Necessary for Water Service: Water service to the Service Area will require the installation of both offsite and onsite infrastructure, which shall be installed under subsequent Facility Agreements with the Agency. In addition to the installation of onsite distribution facilities normally required for any development project, due to the location and character of this Project, prior to receiving any water service to the Service Area the

Applicant agrees to construct the following: a transmission pipeline capable of delivering surface water from the City of Roseville's water system to the Service Area, as shown on Exhibit "A"; metering facilities at the point of interconnection with the City of Roseville's water system; and an onsite groundwater well with storage tank and associated facilities, including, but not limited to, a pumping plant, telemetry and control systems, enclosure and storage structures, security fencing, landscaping, groundwater treatment facilities if necessary, and adequate land around the site sufficient for future anticipated maintenance of the well and associated facilities, hereinafter all collectively referred to as the "Facilities."

In recognition of the RUSP developer's commitment to construct the "Facilities", Section 7 of the Master Facilities Agreement defines PCWA obligations regarding reservation of capacity. This section states:

7. Reservation of Capacity: Except as specifically provided in a written agreement, the Agency does not reserve water or capacity in any facilities for any customer until the applicable WCC has been paid. Because the Applicant will be paying for the Facilities required by this Agreement, the Agency will reserve sufficient capacity in them to serve the build out of the Service Area if those Facilities are constructed in accordance with and at the times required by this Agreement. However, there are presently upstream transmission capacity limitations, and if other parties pay the Agency's WCC and thereby reserve capacity in those upstream pipelines, the Agency may not be able to deliver to the Facilities the full amount of water needed to serve the Service Area. In that event, construction of additional transmission infrastructure will be needed to enable the Agency to deliver the full amount of water to serve the Service Area. It is the Agency's intent, but not an obligation under this Agreement, to insure that such additional transmission infrastructure is constructed in a timely manner so as not to restrict development of the Service Area. If however, such additional transmission infrastructure is not constructed in time to prevent a delay in the development of the Service Area, the Agency will use its best efforts to supply groundwater from the Facilities on an interim basis until the Agency can complete the needed transmission infrastructure to supply surface water. No capacity will be reserved in those additional facilities for the Applicant or others unless or until the applicable WCC has been paid.

As a condition of Section 5, water infrastructure "Facilities" will be installed at initial development to provide treated water service to the project. Onsite transmission pipes will be constructed to provide service within the RUSP and offsite transmission pipes will be constructed to connect to a source of treated surface water. A groundwater well and storage tank will be constructed to provide a source of supplemental potable water. The ownership of these "Facilities" will be transferred to the PCWA.

If a sufficient treated surface water supply is unavailable after the "Facilities" are constructed, PCWA is obligated under the terms of Section 7 to use its best efforts to supply groundwater from the "Facilities" on an interim basis until a sufficient treated surface water supply is available.

Response to Comment 4-3

The comment notes that Mitigation Measure 6.14-1(a) (see page 6.14-21) requires compliance with Government Code section 66473.7 (SB 221), which requires the legislative body of a city, county, or local agency to include as a condition in any tentative map that includes a subdivision a requirement that a sufficient water supply shall be available to serve the subdivision. The comment states that the analysis required under Government Code section 66473.7 has already been performed. However, Mitigation Measure 6.14-1(a) does not require the preparation of a water supply assessment, which has already been prepared; rather, it requires written verification from the water

service provider that indicates that the public water system is able to provide a sufficient water supply that will meet the projected demand associated with the proposed subdivision. The written verification shall be a condition of County approval of any subdivision map or any similar project-specific discretionary approval or entitlement required for non-residential uses.

The comment also states that Mitigation Measure 6.14-1(a) should be amended to state that the developer will be required to provide all on-site and off-site water pipelines and facilities required to deliver potable water to and throughout the project area, as identified in the analysis. The RUSP project includes development of a potable water distribution system that would deliver potable water to and throughout the project site; therefore, it is not necessary to amend the mitigation measure to require the provision of the distribution system. The intent of Mitigation Measure 6.14-1 a) is to identify monitoring criteria for different classes of development projects to insure that proposed water demands do not exceed current infrastructure capabilities. This mitigation measure is not intended to establish the developer's obligation pertaining to potable water infrastructure construction; the RUSP developer's potable water infrastructure obligations are identified in Section 5 of PCWA Master Facilities Agreement, No. 2330, between the Placer County Water Agency and KT Communities. (Please refer to response to Comment 4-2).

Response to Comment 4-4

Comment noted. The text of Mitigation Measure 6.14-1(c) and (d) on page 6.14-22 of the Draft EIR is revised as follows:

- c) *Prior to approval of any small lot tentative subdivision map or similar project level discretionary approval for land uses that do not require a tentative subdivision map, the project applicant, in conjunction with the Placer County Water Agency (PCWA), shall perform an analysis of the remaining wheeling capacity in the City of Roseville's system. This analysis shall consider all of the previously committed demand to Morgan Creek, Placer Vineyards, Regional University or other projects within southwest Placer County that rely on water conveyed through City of Roseville facilities and/or pursuant to the wheeling agreement between the City of Roseville and PCWA, as amended from time to time. The analysis shall be submitted to both the County and the City of Roseville. The County shall confirm with PCWA that uncommitted capacity remains to wheel the required amount of PCWA-supplied water to the Specific Plan area prior to approval of discretionary actions. In the event sufficient uncommitted capacity does not exist, the County shall not grant the proposed tentative subdivision map or other project level discretionary approval until the County determines that a water supply not dependent on water from PCWA that is wheeled through the Roseville system becomes available for the area at issue.*

- d) *Prior to approval of any small lot tentative subdivision map or similar project level discretionary approval for land uses that do not require a tentative subdivision map, the project applicant, in conjunction with the PCWA, shall show that total RUSP groundwater withdrawal will be limited to less than 2,440 AFA for the entire Plan Area.*



January 23, 2008

Attn: Paul Thompson
Placer County Community Development Resource Center
3091 County Center Drive
Auburn, CA 95603

RE: REGIONAL UNIVERSITY SPECIFIC PLAN DRAFT EIR

Dear Mr. Thompson:

Thank you for the opportunity to review the above mentioned DEIR. The Western Placer Waste Management Authority's (WPWMA) comments are as follows:

Public Utilities – Solid Waste

- 1. Page 6.11-12 – The first sentence begins with "After all recyclable material has been removed at the MRF...". The MRF does not remove all recyclable material from the waste; it would be more accurate to state, "After recyclable materials have been sorted at the MRF, the residual waste is transferred..." 5-1
- 2. Page 6.11-12 – Footnote 14 incorrectly lists Eric Oddo's title as Sr. Planner; Mr. Oddo's correct title is Senior Civil Engineer. 5-2
- 3. Page 6.11-18 – The 3rd paragraph states that other landfills would be available to accept waste should the Western Regional Sanitary Landfill be unable to serve the project area. This may not be the case; these sites/counties may have bans which prohibit the acceptance and burial of out of county wastes. How many of the listed landfills accept out-of-county waste? 5-3
- 4. Page 6.11-19 – The DEIR states that Mitigation Measure (b) is subject to review by WPWMA; the source separated green waste program should also be subject to approval by Auburn Placer Disposal Service, the County's franchised waste collector for the project area. 5-4

Page 6.11-19 – The DEIR states that Mitigation Measure (c) will ensure recycling centers in the plan area. The implementation of recycling programs need to be approved by the WPWMA; flow control agreements between WPWMA and participating jurisdictions preclude development and implementation of new recycling programs without prior approval by the WPWMA. 5-5

Regional University Specific Plan Administrative Draft EIR
Paul Thompson
January 23, 2008
Page 2 of 2

Thank you for the opportunity to comment. If you have any questions, please feel free to call me at 530-886-4965.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hanson", written in a cursive style.

Chris Hanson
Senior Planner

LETTER 5: WESTERN PLACER WASTE MANAGEMENT AUTHORITY, CHRIS HANSON**Response to Comment 5-1**

Comment noted. The first sentence of the third paragraph on page 6.11-12 of the Draft EIR is revised as follows:

After ~~all~~ recyclable materials ~~has~~ have been ~~removed~~ sorted at the MRF, the ~~remaining solid residual~~ waste is transferred to the adjacent landfill, the Western Regional Sanitary Landfill (WRSL).

Response to Comment 5-2

Comment noted. Footnote 14 on page 6.11-12 of the draft EIR is revised as follows:

14 Eric Oddo, Senior ~~Planner~~ Civil Engineer, Western Placer Management Authority, personal communication, April 18, 2005.

Response to Comment 5-3

The comment is correct; two landfills on the list currently do not accept out-of-county waste. The list on page 6.11-18 of the Draft EIR is amended as follows:

- ~~• Neal Road Landfill, Butte County, 22,001,876 cubic yards remaining capacity~~
- L and D Landfill, Sacramento County, 5,190,536 cubic yards remaining capacity
- Sacramento County (Keifer) Landfill, Sacramento County, 86,163,462 cubic yards remaining capacity
- Foothill Sanitary Landfill, San Joaquin County, 94,969,466 cubic yards remaining capacity
- Forward Landfill, San Joaquin County, 40,031,058 cubic yards remaining capacity
- North County Landfill, San Joaquin County, 13,239,032 cubic yards remaining capacity
- Hay Road Landfill, Solano County, 22,815,505 cubic yards remaining capacity
- Portero Hills Landfill, Solano County, 8,200,000 cubic yards remaining capacity
- ~~• Tehama County/Red Bluff Landfill, Tehama County, 2,424,448 cubic yards remaining capacity~~
- Fink Road Landfill, Stanislaus County, 10,000,000 cubic yards remaining capacity
- Yolo County Central Landfill, Yolo County, 16,122,000 cubic yards remaining capacity
- Norcal Waste Systems Ostrom Road LF Inc., Yuba County, 11,252,490 cubic yards remaining capacity
- Lockwood Landfill, Sparks, Nevada, 37,500,000 cubic yards remaining capacity

Response to Comment 5-4

Comment noted. Mitigation Measure 6.11-7(b) on page 6.11-19 of the Draft EIR is revised as follows:

- b) *A source separated green waste program shall be implemented within the Plan Area, subject to review and approval by the Western Placer Waste Management Authority and by Auburn Placer Disposal Service.*

Response to Comment 5-5

Comment noted. Mitigation Measure 6.11-7(c) on page 6.11-19 of the Draft EIR is revised as follows:

- c) *The project applicant shall develop and ensure the continuous maintenance of recycling centers within the Plan Area. Recycling centers meeting the standards of the California Integrated Waste Management Board/LEA and County Facility Services Department, including provisions for staffing, continuous maintenance, and resident-friendly hours of operations, shall be a part of the permit conditions for new commercial development. Recycling centers shall accept all types of recyclable waste, shall be fenced and screened from view, and shall be located in commercial areas dispersed throughout the Plan Area. Implementation of all recycling programs shall be approved by the Western Placer Waste Management Authority.*



City of Lincoln • City of Rocklin • City of Roseville • Placer County

January 24, 2008

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

**Re: Regional University Specific Plan Draft EIR
PEIR T20050187 – SCH# 2005032026**

Dear Ms. Krach:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Regional University Specific Plan (Specific Plan).

The South Placer Regional Transportation Authority (SPRTA) and the Federal Highway Administration (FHWA) are working to complete the Placer Parkway Corridor Preservation Project and Tier 1 Environmental Impact Statement/Environmental Impact Report. The Specific Plan lies in the study area of the Placer Parkway Corridor Preservation Project. The Final Tier 1 EIS/EIR for the Placer Parkway Corridor Preservation Project is expected to be completed by summer 2008.

Specific Plan DEIR Comments

Comments were provided (Attachment 1) on the proposed specific plan's Notice of Preparation (NOP) on April 4, 2005. The proposed Specific Plan's DEIR does not appear to contain these comments. We enclose another copy and request that you include it in the Final EIR.

6-1

The Placer Parkway Draft Tier 1 EIS/EIR evaluates five corridor alignment alternatives (Alternatives). Alternatives 1 and 2 cross over the Specific Plan. Alternatives 3, 4, and 5 are to the north.

SPRTA recognizes the County's process to approve this development, including the Specific Plan, is concurrent with the efforts of FHWA and SPRTA to complete the Tier 1 EIR/EIS for the Placer Parkway, and that this concurrent process creates challenges. Because of the complexity of the issues associated with the multiple corridor alignments of the proposed Placer Parkway and the numerous development proposals being considered in western Placer County (including

6-2

this Regional University Specific Plan), SPRTA will continue to work cooperatively with Placer County to assure that the processing of the Final Tier 1 EIR/EIS for the Placer Parkway is not adversely affected. The County has agreed to accept additional detailed comments on the Specific Plan DEIR from SPRTA and to consider such comments in the Specific Plan's Final EIR.

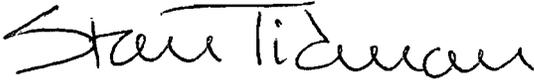
6-2
(con't.)

FHWA and SPRTA will continue to evaluate all five proposed Alternatives for the Placer Parkway, regardless of County action on a particular development proposal. In this regard, the DEIR for the Specific Plan, and other development proposals, should analyze the impacts of all the Placer Parkway Alternatives.

6-3

PCTPA appreciates Placer County's and the specific plan applicant's cooperation and involvement in the Placer Parkway planning and environmental process. If you have any questions, please call Celia McAdam at 823.4030 or me at 823.4033.

Sincerely,



Stan Tidman, Senior Planner

ST:ss
Enclosures

Copies: Celia McAdam, PCTPA Executive Director
Cesar Perez, Federal Highway Administration
Larry Combs, County Administrative Officer
Denise Heick, URS Corporation



PLACER COUNTY
TRANSPORTATION
PLANNING AGENCY

RECEIVED
APR 04 2005

PLANNING DEPT.

April 4, 2005

KATHY SANDS
City of Auburn
SHERRIE BLACKMUN
City of Colfax
TOM COSCROVE
City of Lincoln
MIGUEL UCOVICH
Town of Loomis
KATHY LUND
City of Rocklin
GINA CARBOLINO
City of Roseville
HARRIET WHITE
TED GAINES
Placer County
ROGER IMSDAHL
Citizen Representative
CELIA MCADAM
Executive Director

Lori Lawrence
Placer County Planning Department
11414 "B" Avenue,
Auburn, CA 95603

Re: De La Salle University & Community Specific Plan EIR – Notice of Preparation

Dear Ms. Lawrence,

Thank you for the Notice of Preparation (NOP) for the proposed De La Salle Specific Plan (DLSSP) project. PCTPA, on the behalf of the South Placer Regional Transportation Authority (SPRTA), is working to complete the Placer Parkway Corridor Preservation and Tier 1 Environmental Impact Statement/Environmental Impact Report (Tier 1 EIS/EIR).

The proposed DLSSP lies in the central segment of the Parkway's study area. See the attached vicinity map.

Placer Parkway

Concept

Placer Parkway is a high-priority regional transportation project. It would connect rapidly growing areas of western Placer County at SR 65 to planned development in south Sutter County at SR 70/99.

The concept of the Placer Parkway has been considered for over a decade. Placer County's 1994 General Plan depicts a plan line for it. Later, PCTPA and SACOG Boards adopted preliminary planning documents for the Parkway (2000 Conceptual Plan and 2001 Project Study Report). The project is also identified in the 20022 Placer County Regional Transportation Plan and SACOG's 2025 Metropolitan Transportation Plan. See the PCTPA web site – www.pctpa.org – for more background.

Corridor Preservation Project

The Corridor Preservation project has two phases:

- Phase 1 – identify feasible corridor alignment alternatives.
- Phase 2 – complete the Tier 1 EIS/EIR.

During Phase 1, two public scoping meetings and two public information meetings were held within the study area, and two newsletters were sent to several thousand individuals. Seven Technical Advisory Committee Meetings, comprised of staff of affected jurisdictions and agencies, were held. Five Study Advisory Committee meetings, comprised of stakeholders including a De La Salle representative, were held. Three Public Advisory Committee meetings, comprised of elected officials, and representatives from Caltrans and FHWA, were held. In addition, informational briefings were made to the Placer County and Sutter County Boards of Supervisors, and individual meetings were held with affected jurisdictions and interested members of the public on a variety of topics, including meetings with representatives of De La Salle.

At this time, four potential corridor alignment alternatives and their connections at SR 65 and SR 70/99 have been identified (see attached map). Two of these potential corridor alternatives cross over the proposed DLSSP project area. In addition, two more possible corridor alternatives have also been offered for consideration. Neither of these would cross the proposed project area. Other potential connections/alignments may be also identified through coordination with federal resource agencies.

There is no 'preferred' or 'recommended' corridor alignment for the Placer Parkway, nor will there be until the Tier 1 EIS/EIR is completed. The 500'- to 1,000'-wide corridor alternatives to be studied in the Tier 1 EIS/EIR should be identified later this summer. Federal and State clearances for the corridor preservation environmental work maybe ready by 2008. Once the preferred corridor is determined, key pieces of land can be acquired to preserve right-of-way for the Parkway.

The approximate 300'- to 350'-wide transportation facility will eventually be located within the Parkway corridor. The roadway's precise location within the corridor will be determined by a second project-level environmental review.

NOP Comments

The Placer Parkway is mentioned twice in the NOP. First, DLSSP may be served by the Parkway along with I-80, SR 65, and SR 70/99. Second, project

Lori Lawrence, Placer County Planning Department
April 1, 2005
Page 3

alternatives including Parkway alignments are located along the proposed project's eastern border.

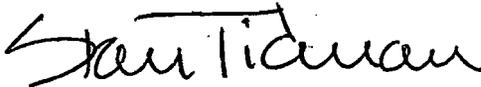
PCTPA recognizes the concurrent development of the DLSSP and EIR along with the Parkway's Corridor Preservation Tier 1 EIS/EIR creates a challenging situation for all involved. We appreciate DLSSP and Placer County involvement in the Placer Parkway planning and environmental process. We will continue to share information on the Placer Parkway. We would be happy to share the Placer Parkway's existing information with the EIR preparers.

The DEIR should:

1. Indicate that there are two potential Placer Parkway corridor alternatives, identified through a public review process, which would cross over the proposed project, and another corridor that lies directly north of it.
2. Address, as an alternative, how the DLSSP could stage or phase development in order to avoid conflict with the Placer Parkway development process.

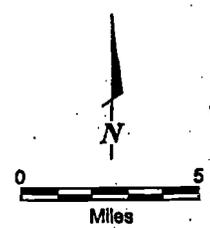
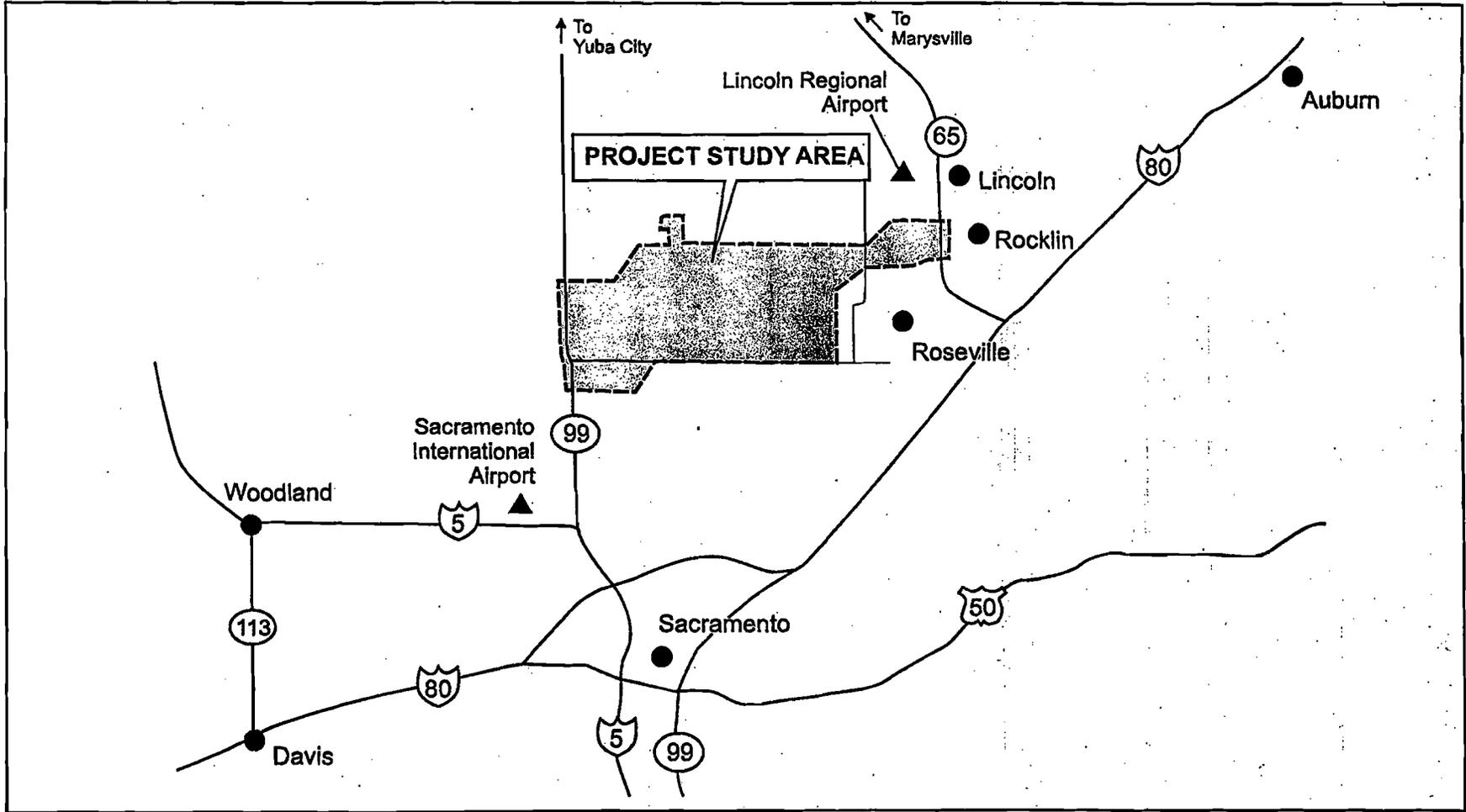
Thank you for the opportunity to comment. If you have any questions, please call Celia McAdam at 823.4030 or me at 823.4033.

Sincerely,



Stan Tidman, Senior Planner

Copies: Celia McAdam, PCTPA Executive Director
Rick Dondro, Placer County -- Deputy Director Public Works
Julie Hanson, KT Communities
Denise Heick, URS Corp.



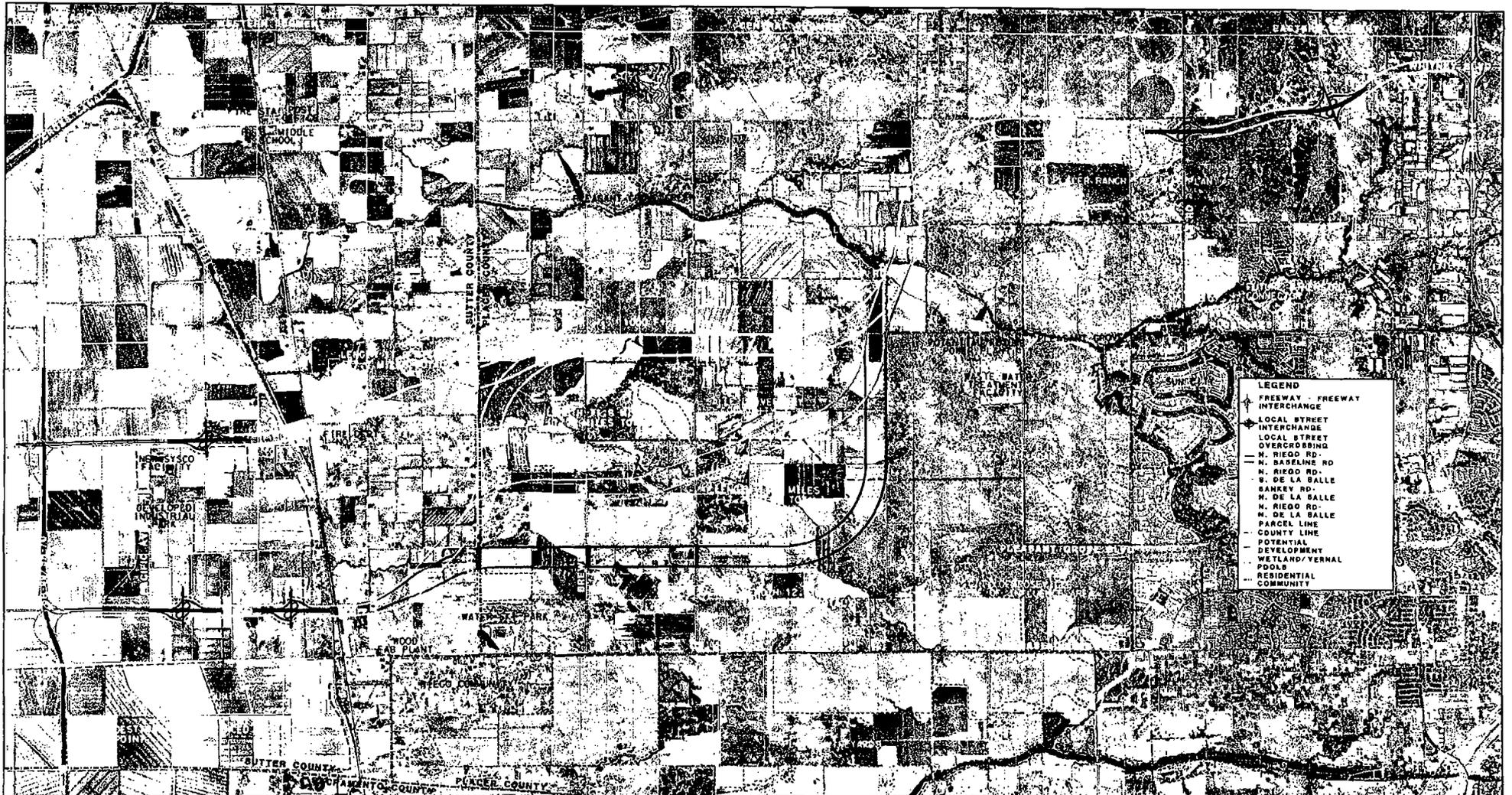
PP PLACER PARKWAY
CORRIDOR PRESERVATION

PROJECT LOCATION MAP

Screening Evaluation of PSR Alternatives
December 2003 Placer Parkway Corridor Preservation
28066593 Tier 1 EIS/EIR

URS

FIGURE 1-1



PP PLACER PARKWAY
PLACER COUNTY

TIER 1 EIS/EIR

POTENTIAL CORRIDOR ALIGNMENT ALTERNATIVES
 FOR EIS/EIR ANALYSIS

AUGUST 2004

**LETTER 6: SOUTH PLACER REGIONAL TRANSPORTATION AUTHORITY, STAN
TIDMAN**

Response to Comment 6-1

Comment noted. The SPRTA's April 4, 2005 comment letter on the EIR Notice of Preparation follows the comment letter on the Draft EIR. Please see Response to Comment 6-3.

Response to Comment 6-2

The commenter's desire to work cooperatively with the County is noted.

Response to Comment 6-3

The comment states that the RUSP EIR should evaluate the impacts of all five Placer Parkway Alternatives. As stated on page 7-8 of the Draft EIR, Placer Parkway Alignments 1 and 2 would pass through the Regional University Specific Plan Area. Because of the location of Placer Parkway Alignments 1 and 2, substantial changes to the land use plan for RUSP would be required in order to accommodate Placer Parkway. The extent of the required changes, particularly for Alignment 2, would reduce the size of the Community portion of the project and hinder the project's ability to function as an integrated community. Therefore, a project alternative that assumed construction of Placer Parkway for Alignments 1 and 2 was not considered in the Draft EIR. The potential for construction of Placer Parkway along Alignments 3, 4, or 5 were considered in the technical sections (Sections 6.1 through 6.14) of the Draft EIR.



MIWOK
MAIDU

United Auburn Indian Community
of the Auburn Rancheria

Jessica Tavares
Chairperson

Kim Dubach
Vice Chair

David Keyser
Secretary

Dolly Suehead
Treasurer

Gene Whitehouse
Council Member

January 17, 2008

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

RECEIVED

JAN 25 2008

ENVIRONMENTAL COORDINATION SERVICES

Subject: Regional University Specific Plan Draft EIR, PEIR T20050187,

Dear Mr. Krach:

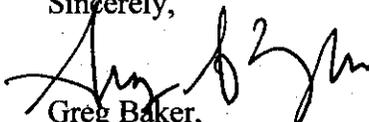
Thank you for the opportunity to review the document referenced above. The United Auburn Indian Community (UAIC) is comprised of Miwok and Maidu people whose traditional homeland includes Placer and Nevada counties, as well as some surrounding areas. The UAIC is concerned about development within ancestral territory that has the potential to impact sites and landscapes that may be of cultural or religious significance. We appreciate the opportunity to comment on the proposed project.

Based on the information provided in the Draft EIR, the UAIC understand that no significant cultural resources have been identified within the project area. We understand that two previously recorded sites were not located during the most recent archaeological survey, due in part to past agricultural activities. We would like to note the possibility for discovery of previously unidentified cultural resources or subsurface deposits remains high for the areas these resources were first reported.

If an inadvertent discovery occurs during development of the proposed project, in addition to contacting the County and a qualified archaeologist, the UAIC also requests to be contacted to provide input on the appropriate course of action. The UAIC is interested in holding conservation easements for culturally significant prehistoric sites should they become known.

Thank you for involving the UAIC in the planning process. If you have any questions please contact Shelley McGinnis, Analytical Environmental Services, at (916) 447-3479.

Sincerely,


Greg Baker,
Tribal Administrator

CC: Shelley McGinnis, AES

7-1

LETTER 7: UNITED AUBURN INDIAN COMMUNITY**Response to Comment 7-1**

The comment requests that the United Auburn Indian Community (UAIC) be contacted should an inadvertent discovery of cultural resources or subsurface deposits occur during development of the proposed project. The request is noted, and Mitigation Measure 6.5-2 on page 6.5-12 of the Draft EIR is revised as follows:

6.5-2 If human remains are discovered at any project construction sites during any phase of construction, all ground-disturbing activity within 50 feet of the remains shall be halted immediately, and the Placer County Planning Department, ~~and~~ the County coroner, and the United Auburn Indian Community shall be notified immediately. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The County shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project applicant shall implement approved mitigation, to be verified by the County, before the resumption of ground-disturbing activities within 50-feet of where the remains were discovered.

The County would also like to express its appreciation of the UAIC's ongoing participation in the Local and Tribal Intergovernmental Consultation (SB 18) process, which requires cities and counties to notify and consult with California Native American Tribes about proposed local land use planning decisions for the purpose of protecting Traditional Tribal Cultural Places. The UAIC's most recent written communication with the County as part of the SB 18 process indicated that the UAIC had reviewed the materials sent by the County describing the RUSP project and did not have any further questions at that time.²

² McGinnis, Shelley, Senior Associate, Analytical Environmental Services. Email communication to Jennifer J. Dzakowic, Senior Planner, Placer County Planning Department, April 11, 2007.



COUNTY OF PLACER
AGRICULTURAL COMMISSION

CHRISTINE E. TURNER
Agricultural Commissioner
Sealer of Weights & Measures

AGRICULTURAL COMMISSION MEMBERS
Tony Aguilar Larry Jordan
Patricia Beard William Morebeck
James Brenner Vicky Morris
Paul Ferrari John Nitta
Wavne Vinevard

11477 E AVENUE
AUBURN, CALIFORNIA 95603
TELEPHONE: (530) 889-7372
FAX: (530) 823-1698
www.placer.ca.gov

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CDRA

January 24, 2008

ENVIRONMENTAL COORDINATION SERVICES

TO: Maywan Krach, Community Development Resource Agency

Wayne Vinevard

FROM: Wayne Vinevard, Chairman, Placer County Agricultural Commission

SUBJECT: **Draft Environmental Impact Report (EIR) for the Regional University Specific Plan dated December 2007**

On behalf of the Placer County Agricultural Commission, the following comments are submitted regarding the Draft Environmental Impact Report (EIR) for the Regional University Specific Plan dated December 2007:

The proposed Regional University Specific Plan area is currently zoned F-B-X (Farm-Combining-80 acre minimum parcel size). The entire site, 1,157 acres, is classified as Important Farmland by the California Department of Conservation with approximately 664 acres in active rice production, 297 acres of inactive rice farmland, and 126 acres in dry land farming or grazing. This does not take into account any off-site impacts to farmland resources. In addition, a portion of the 1,157 acres are under a Williamson Act Contract.

8-1

The Agricultural Commission supports the Placer County General Plan Goals and Policies as they relate to the protection of Agricultural Resources. Specifically, under Section 7, Agricultural and Forestry Resources:

Goal 7.A: To provide for the long-term conservation and use of agriculturally-designated lands.

8-2

Policies

7.A.1. The County shall protect agriculturally-designated areas from conversion to non-agricultural uses.

7.A.2. The County shall ensure that unincorporated areas within city spheres of influence that are designated for agricultural uses are maintained in large parcel sizes of 10-acre minimums or larger.

7.A.3. The County shall encourage continued and, where possible, increased agricultural activities on lands suited to agricultural uses.

7.A.7. The County shall maintain agricultural lands in large parcel sizes to retain viable farming units.

7.A.8. The County shall encourage infill development in urban areas as an alternative to expanding urban boundaries into agricultural areas.

7.A.12. The County shall actively encourage enrollments of agricultural lands in its Williamson Act program.

Goal 7.B: To minimize existing and future conflicts between agricultural and non-agricultural uses in agriculturally-designated areas.

Policies

7.B.1. The County shall identify and maintain clear boundaries between urban/suburban and agricultural areas and require land use buffers between such uses where feasible. These buffers shall occur on the parcel for which the development permit is sought and shall favor protection of the maximum amount of farmland.

The proposed Regional University Specific Plan project is inconsistent with these Placer County General Plan Goals and Policies related to the protection of the County's agricultural/farmland resources.

In addition, there are internal inconsistencies in the Draft EIR.

Page 2-4: Farmland Classification and Soil Types. States, "The entire site is classified as Important Farmland by the California Department of Conservation, with approximately 564 acres of Unique Farmland, approximately 518 acres of Farmland of Local Importance, and approximately 75 acres of Farmland of Statewide Importance." This results in a total of 1,157 acres of farmland within the Specific Plan area, but does not include any off-site farmland that would be impacted.

Page 3-9: Table 3-1, Summary of Impacts and Mitigation Measures. Impact 6.1-1, Mitigation Measure is to, "*Implement Mitigation Measure 6.2-1, which requires that one acre of agricultural land be preserved within Placer County for each acre of agricultural land impacted by the Community and University development within the Specific Plan area.*" The EIR indicates that the entire Regional University Specific Plan area is currently classified as farmland, 1,157 total acres, and that there would no longer be any farming activity within the Plan area if the Specific Plan is approved for development.

Page 3-13: Table 3-1, Summary of Impacts and Mitigation Measures. Impact 6.2-1, Mitigation Measure states, "*In order to mitigate for the loss of farmland resources converted to non-agricultural uses on the project site and on areas designated for off-site improvements, one acre of agricultural land within Placer County shall be preserved for each acre of agricultural land impacted by the Community and University development within the project area. A total of 1,024 acres has been identified to be compensated at this one-to-one ratio.*" The conclusion that only 1,024 acres has to be mitigated for is inconsistent with the facts outlined above. The total mitigation would be for 1,157 acres.

8-2
(con't.)

8-3

Mitigation Measure 6.2-1 goes on to state, *“That portion of the University site consisting of 183.5 acres proposed as open space and not currently in agricultural production and 53 acres of land temporarily impacted do not require mitigation.”* This conclusion is not consistent with the facts outlined above and whether the agricultural land is “currently in production” or not is irrelevant to the loss of the resource. Further, none of the “open space” within the Plan area will include any farming activities and therefore all “open space” within the Plan area also represents agricultural land impacted by the Community and University development within the project area and would therefore also require one-to-one mitigation.

cc: Placer County Agricultural Commission
Christine Turner, Agricultural Commissioner
Paul Thompson, Planning Department

↑
8-3
(cont.)

LETTER 8: COUNTY OF PLACER AGRICULTURAL COMMISSION, WAYNE VINEYARD**Response to Comment 8-1**

The comment refers to acreages within the project site and states that these numbers do not account for any off-site acreage. The comment is correct: the text to which the comment refers (see Draft EIR page 6.2-1 under the heading *RUSP Project Site*) is specifically describing conditions on the project site. Off-site areas are described on pages 6.2-4 and 6.2-6 of the Draft EIR. As shown in Figure 6.2-3 on page 6.2-18 of the Draft EIR, there are no lands within the project site or off-site infrastructure areas that are under a Williamson Act contract.

Response to Comment 8-2

The comment lists Placer County General Plan policies related to agricultural land and states that the proposed project is inconsistent with those policies. The determination of whether the proposed project is consistent with the County's General Plan is at the discretion of the Board of Supervisors. Nonetheless, the Draft EIR considered the physical effects of potential conflicts with General Plan policies that address agricultural land under Impact 6.2-2 on pages 6.2-15 through 6.2-17.

Response to Comment 8-3

The comment refers to text in the Draft EIR that defines the project site as containing 1,157 acres of agricultural land and states that the Draft EIR contains internal inconsistencies because only 1,024 acres is identified for mitigation. As discussed in the Draft EIR on page 6.2-13, the 183.5-acre portion of the project site identified as Farmland of Local Importance referenced in the comment currently supports no agricultural uses because of the dense matrix of naturally occurring and created wetlands that occupy a portion of the acreage. This acreage has not been used for farming and the applicant has recognized that preservation of this land is important to maintain the existing biological resources and the natural drainage needed to support the wetlands. Therefore, this acreage is designated for preservation in Open Space under the proposed project to provide multiple benefits, including passive recreation, habitat, and stormwater detention/retention, and the land will continue to function in a similar manner to its current function.

The comment contends that whether the land is currently in agricultural production is not relevant to the loss of the resource. However, as discussed in the Draft EIR on page 6.2-13, the current use on this portion of the site as upland habitat associated with the wetlands protected in the conservation easement precludes any potential for agricultural activities on this site. This portion of the site is identified as Farmland of Local Importance, which is defined (on page 6.2-2 of the Draft EIR) as:

Land other than Unique Farmland, which may be important to the local economy due to its productivity or value. Determined by each county's board of supervisors and a local advisory committee. In Placer County, Farmland of Local Importance is defined as: Farmlands not covered by the categories of Prime, Statewide, or Unique. They include lands zoned for agriculture by County Ordinance and the California Land Conservation Act as well as dry farmed lands, irrigated pasture lands, and other agricultural lands of significant economic importance to the County and include lands that have a potential for irrigation from Placer County water supplies.

While this portion of the site is currently defined as Farmland of Local Importance, its continued classification as such is dependent upon its value for agricultural production. Given the physical constraints for agricultural production on this portion of the site, it is likely that this portion of the site would be reclassified by the California Department of Conservation (CDC) when the database is

updated. For these reasons, this land was not included in the mitigation acreage for the loss of agricultural land. Therefore, it is the EIR author's opinion that there is not an internal inconsistency in the Draft EIR.

Jan 10-2008 Planning Commission Hearing
Regional University Specific Plan DEIR
Comments from Christine Turner, Placer County Ag Commissioner

34:54 total time for this item

Comments to be found at 24:20

Good morning Christine Turner Placer County Agricultural Commissioner

I am here on behalf of the Agricultural Commission which has been following this project for a number of years now. Just a couple of brief comments I would like to share at this time, the chairperson of the Ag Commission will be submitting comments in writing prior to the close of the public comment period on January 24th . Under the Agricultural Resource section it was noted that this project would represent a loss of farm land. This is 11,157 acres of farm land that is currently zoned farm 80 acre minimum and is recognized by the California Dept of conservation for its farmland resource values. There is an existing Williamson Act contact and the commission is concerned about early cancellation setting an undesirable precedence for other Williamson Acts and potential development projects. This project is also in conflict with a number of our county general plan policies and goals related to the preservation of agriculture, that's an area that the Ag Commission has historically been very concerned about with the number of these large projects. Water supply for increased development also ultimately represents a negative impact for agriculture anytime we enter into a drought situation which is a little hard to think about with all of the weather we have recently gotten but none the less our history in California we will indeed have another drought period. At those times agriculture looses its water supply before any kind of urban development looses their water supply. So that's the reality of just providing service to people that need water. I think that given that this land is certainly in an area that has recognized as farming, is currently farmed, has historically been farmed, would represent that there would be no agriculture taking place on any of the portion of this proposed project area, that those things need to be weighed very carefully in consideration. When we determine that something is significant and unavoidable I think that it is a really important evaluation and determination that we need to take into consideration.

9-1
9-2
9-3
9-4
9-5
9-6

Thank you

End at 27:08

LETTER 9: CHRISTINE TURNER, COUNTY OF PLACER AGRICULTURAL COMMISSIONER (oral comments received in response to the hearing on the Draft EIR)

Response to Comment 9-1

Comment noted.

Response to Comment 9-2

The commenter mistakenly stated that the project site is 11,157 acres. The project site is 1,157 acres. The remainder of the comment is correct.

Response to Comment 9-3

The comment refers to a Williamson Act contract, although not to a specific property. Williamson Act contracts in the vicinity of the project site are shown in Figure 6.2-3 on page 6.2-18 of the Draft EIR. There are no lands within the project site or off-site infrastructure areas that are under Williamson Act contract.

Response to Comment 9-4

Please see Response to Comment 8-2 which addresses the project's consistency with General Plan goals and policies that address agricultural land.

Response to Comment 9-5

The comment states that increased development represents a negative impact on agriculture due to competition for water supplies. As discussed in the Draft EIR, Placer County Water Agency (PCWA) would provide potable water to serve the proposed project. Other water providers in western Placer County, including Sacramento Suburban Water District (SSWD) and Nevada Irrigation District (NID), would also rely on American River water, in addition to groundwater. Each of the water providers would share reliability of the American River source and be subject to the same cutback allocations during a drought period. While some agricultural customers may be requested to cut back water use during a drought period, it is anticipated any cutbacks would be temporary. The reader is also referred to Table 6.14-8 on Draft EIR page 6.14-19, which compares historic groundwater withdrawal for irrigation with the net potable water demand for the proposed project. As shown in the table, historic groundwater withdrawal exceeds the net project demand. Therefore, if a situation should arise that PCWA would serve the entire Plan Area with groundwater, the future use would not exceed historic withdrawals.

Response to Comment 9-6

The comment is noted and forwarded to the decision-makers for their consideration.



SUTTER COUNTY
COMMUNITY SERVICES DEPARTMENT

Planning – Lisa Wilson, Planning Division Chief
Animal Control
Building Inspection
Environmental Health

Director – Larry Bagley
Assistant Director – Randy Cagle
Fire Services – Dan Yager
Emergency Services – John DeBeaux

January 22, 2008

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

Re: Regional University Specific Plan Draft EIR

Dear Mr. Krach:

Sutter County thanks you for the opportunity to comment on the above project.

As you are aware, Sutter County has previously expressed concern about the unmitigated traffic impacts Placer County projects could have upon roadways in our jurisdiction. Our concern continues with this project. Sutter County offers the following comments:

- 1. IMPACT 6.12-1, Exceeding capacity of regional roadway network (existing + project) SU. Mitigation 6.12.-1.6; Payment of impact fees if/when Sutter County enters into an enforceable agreement. Sutter County requests that negotiations commence immediately on the proposed project's "fair share" and a legally enforceable agreement. 10-1
 - 2. IMPACT 6.12-4, Increase daily traffic volumes using Caltrans roadway segments (existing + project) SU. Mitigation 6.12.4 Scenario A-C, pay "fair share" for SR 70/99 widening. Mitigation should address planned interchange at Riego Rd/SR 70/99 and project's fair share. 10-2
 - 3. IMPACT 6.12-7, Increase peak hour traffic volumes using Sutter County intersections (existing + project) SU. Mitigation 6.12-7 refers to an intersection A and B with locations not defined. Section 6.12 of the Draft EIR refers to 24 "numbered" intersections (1-24). Intersection analysis should include intersections at Riego Rd/UP Railroad crossing (east of Natomas Rd) and Riego Rd/Pacific Ave (Caltrans approved Truck Terminal Route). 10-3
- The new traffic signals proposed on Riego Road (existing + project) will impose an annual maintenance burden on Sutter County. A funding mechanism needs to be established to pay for the annual maintenance of these new signals on Riego Road until such time as additional development is established in south Sutter County. 10-4
- Draft EIR Mitigation suggests project "fair share" to widen Riego Rd from two to four lanes between Pleasant Grove Rd (south) and SR 70/99, and refers to Mitigation measure 6.12-1, possible future agreement with Sutter County. This mitigation measure has not been affected. 10-5

Additionally, DEIR Table 6.12-6 does not contain analysis of this segment of roadway. Traffic count data used in the Draft EIR is from May, 2005, (DEIR page 6.12-10). More current data is available and on file with the Placer County Planning Dept (see 2007 Placer Vineyards file and Sutter County correspondence concerning same).

10-6

4. IMPACT 6.12-18, Increase peak hour traffic volumes using Sutter County intersections resulting in unacceptable LOS conditions (cumulative + project) SU. Mitigation 6.12-18 refers to payment of "fair share" and a future agreement (Mitigation 6.12-1). This mitigation measure has not been affected.

10-7

Full cumulative analysis of all five Riego Rd intersections and the UP RR crossing (grade separation) impacts and mitigation are not presented, nor are the widening of Riego Rd and its two bridges (SUT18C0050 and RD 1000 crossing).

10-8

5. IMPACT 6.12-26, Mitigation measure could adversely impact traffic in other jurisdictions. SU. Mitigation 6.12-26, Placer County shall coordinate with....Sutter County to ensure.....improvements....minimize impacts.... Coordination on past projects has not been productive, nor has a "legally enforceable" bi-county agreement been negotiated to date.

10-9

6. Sutter County requests that negotiations commence immediately on the Specific Plan's "fair share" and full impact mitigations, since Sutter County cannot know if impacts will be mitigated until a "legally enforceable" funding agreement is negotiated. Sutter County requests the adoption of the final EIR be delayed until successful negotiations have been concluded and a Funding Agreement has been adopted by our counties.

10-10

Sutter County contends that Placer County is responsible for fully mitigating traffic impacts resulting from Placer County projects upon Sutter County roadways.

In summary, Sutter County has grave concerns about the inadequacy of the Draft EIR and mitigation measures proposed. We request that sufficient time be provided for resolution of the traffic impact issues between our counties. Sutter County will not accept inadequately mitigated effects from this project.

Please provide our office with all future notices regarding this project.

Sincerely,



Doug Libby, AICP
Principal Planner

DL:gg
cc: Al Sawyer, Assistant Public Works Director

LETTER 10: SUTTER COUNTY, DOUG LIBBY**Response to Comment 10-1**

Commenter correctly notes that the Draft EIR concludes that Impact 6.12-1, which states that the proposed project could contribute to traffic volumes that exceed the capacity of the regional roadway network under existing plus project conditions, remains significant and unavoidable after the implementation of mitigation. (Draft EIR, pp. 16.12-80 to 16.12-96.)

Draft EIR Mitigation Measure 6.12-1 makes clear that a fair-share contribution by the project, and similar contributions from all other projects responsible for increasing congestion on these roadway segments, will only be viable after an appropriate fee collection and expenditure mechanism is first established. Because County decision-makers will take action on the Specific Plan without knowing with certainty that the agreements contemplated by Mitigation Measure 6.12-1 will come to fruition, the language of both the measure and the EIR recognize that such success cannot be absolutely guaranteed.

The County believes that the establishment of an enforceable agreement between Caltrans and Placer County, consistent with State law and Placer County General Plan Policy 3.A.15, is a proper prerequisite to the County making the Specific Plan's fair share contributions, and all other projects' fair share contributions, available to Caltrans (see Mitigation Measure 6.12-4). Under the federal and State constitutions, the County cannot impose on the project proponents the obligation to mitigate impacts not attributable to their project. Thus, without the matching, reciprocal funds needed for certain improvements, the collection of fees from the project applicants would be an idle act. Although Caltrans has established methods in place to assist local agencies with the implementation of local development mitigation measures, until Placer County and Caltrans, as well as other local jurisdictions, establish one or more appropriate, enforceable agreements, the Specific Plan's impacts on the State highway system and roadways within other jurisdictions must be considered significant and unavoidable. Without such an agreement or agreements, the mitigation measures identified in the Draft EIR would be infeasible and the identified improvements would not be guaranteed to occur.

The key point here is that, in preparing the Draft EIR, County staff devised a mitigation strategy that represents a good faith attempt to face the challenges of imposing on a local development project the obligation to mitigate its ascertainable significant impacts on the state highway system. At present, the institutional and legal mechanisms for a flow of money from the applicants to the County and thence to Caltrans simply do not exist, and thus must be created. In considering the Specific Plan, the Board of Supervisors will determine whether, if it approves the Specific Plan, it will also adopt Mitigation Measure 6.12-1. If the Board takes both such actions, the County will be legally bound to approach Caltrans, the City of Roseville, and the counties of Sacramento and Sutter with the intention of seeking agreements by which the project can be made to mitigate its impacts on those jurisdictions' facilities.

The County notes that its approach of assessing the project for only its "fair share" of the costs of various improvements is consistent with constitutional limitations (see CEQA Guidelines section 15126.4, subd. (a)(4), and court cases cited therein). Both the CEQA Guidelines (Section 15130, subd. (a)(3)) and CEQA case law are clear that fee-based infrastructure mitigation programs based on fair-share contributions, such as Mitigation Measure 6.12-1, are adequate mitigation measures under CEQA (see, e.g., *Save Our Peninsula v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99).

The County also notes that, with respect to impacts occurring outside the County's unincorporated area, the County proposes to commit to the steps necessary to create the institutional and legal arrangements needed to create a flow of money from the project proponents to the County and thence to other entities such as Caltrans, the City of Roseville, and the Counties of Sacramento and Sutter. The County has disclosed the impacts of its proposed approach in an honest, straightforward, and legally conservative manner. Not all impacts can be mitigated to less than significant levels. In particular, those impacts that can only be mitigated through fair-share contributions to proposed facilities that would be built outside the unincorporated area (see Draft EIR, Mitigation Measure 6.12-1), and that therefore require the cooperation and participation of one or more agencies other than Placer County, have been identified as potentially significant impacts, since the cooperation of those agencies cannot be guaranteed at this time.

The County acknowledges and appreciates Sutter County's willingness to commence negotiations to establish the necessary institutional and legal arrangements between Sutter and Placer counties. CEQA does not require, however, that these arrangements be in place, or that the exact dollar amount of the project's fair share contribution be calculated, prior to project approval. Placer County will work with each jurisdiction/agency in which mitigation measures are identified to determine the appropriate fair share contribution. The County's view is that, because the proposed mitigation measure is to create new funding programs to deal with impacts occurring outside unincorporated Placer County, nothing in CEQA requires that the EIR for the Regional University Specific Plan contain detailed information regarding specific dollar amounts required for various improvements or what fees per dwelling unit or square foot of non-residential development might be within the Specific Plan area.

Notably, however, the two Counties already have a venue in which to commence preliminary discussions regarding extra-territorial traffic impacts of the RUSP. In July 2007, the Placer County Board of Supervisors approved a very similar mitigation strategy when it adopted the Placer Vineyards Specific Plan. In doing so, Placer County committed itself to approaching Sutter County about means of resolving regional transportation issues and, in particular, how to mitigate the extra-territorial impacts of projects approved by both Counties. While the RUSP administrative process continues towards its completion, the two Counties can make progress on the issue of extra-territorial traffic mitigation by laying the groundwork for a detailed agreement that would at first focus on Placer Vineyards and later be expanded to include the RUSP. The RUSP Draft EIR includes mitigation language similar to that found in the Placer Vineyards EIR because there are now three lawsuits, including one filed by Sutter County, seeking to invalidate the Board of Supervisors' approval of the Placer Vineyards Plan. Although Placer County believes it can successfully defend those lawsuits, the County nevertheless deemed it prudent to consider readopting a similar mitigation measure in connection with the RUSP as insurance against a potential adverse result in the Placer Vineyards litigation, as such a result could lead to the invalidation of the adopted mitigation requiring Placer County to try to enter into a mitigation agreement with Sutter County.

Response to Comment 10-2

The comment states that the project should pay its fair share for any improvements required for the SR 70/99/Riego Road interchange. Mitigation Measure 6.12-21 identifies that the project should pay its fair share of mitigation costs for cumulative impacts on Caltrans interchanges identified in Impact 6.12-21. This list includes the SR 70/99/Riego Road interchange.

Response to Comment 10-3

Please see Response to Comment 2-1.

Response to Comment 10-4

The commenter requests that the applicant create a funding mechanism for the maintenance and operational costs of the proposed new traffic signals. While the need for installation of the signals is triggered by the project, the signals are a general safety enhancement that, once installed, benefit all members of the public utilizing this section of roadway, and would not be the sole responsibility of the project. Notwithstanding the foregoing, the County will consider whether to include a temporary component for signal maintenance in the budget of any funding mechanism that is created by the County to maintain roads in the Specific Plan area in order to reimburse Sutter County for a share of the maintenance costs when such mechanism is put in place. If the County chooses to do so, the temporary signal maintenance component would be included in the bi-county agreement referenced in Mitigation Measure 6.12-1(8).

Response to Comment 10-5

The comment states that Mitigation Measure 6.12-1 has not been put into effect. The comment is correct: the mitigation would not be enforceable and put into effect until the EIR for the project is certified and the project is approved. Please refer to Response to Comment 10-1.

Response to Comment 10-6

As noted on Page 6.12-10 of the Draft EIR, the analysis includes intersections, roadway segments, and freeway ramp junctions. Intersections were analyzed in the vicinity of the proposed project where the greatest effects of the project would occur. Interchange ramp junctions were analyzed outside this immediate influence area and capture the potential regional effects of the project, while roadway segments were analyzed further away from the project site.

Potential impacts on the section of Riego Road between Pleasant Grove Road (south) and SR 70/99 were based on intersection analysis. Generally, intersections are the critical nodes that connect and interconnect all individual roadway segments of the system and are usually the critical elements in ensuring that the roadway system operates adequately. Further, the number of through lanes required at an intersection approach determines how many through lanes are required on the connecting roadway segment. As a result, a separate roadway segment analysis in the Draft EIR was not required for this location.

The comment also states that more recent traffic count data is available. The traffic section of the Draft EIR includes impact analysis for existing and cumulative conditions. The cumulative conditions analysis accounts for traffic growth over time and is an appropriate scenario for considering the potential impacts of the project, given its long-term development timeframe. Further, the Notice of Preparation (NOP) was released in March 2005; the traffic counts were conducted May 2005. Therefore, the traffic counts used in the analysis were consistent with the NOP release date as required by CEQA (CEQA Guidelines section 15125a). While more recent traffic counts could be used for the analysis, the project's contribution to traffic would not differ from that contained in the Draft EIR analysis and neither the significance conclusions nor the proposed mitigation measures would differ from those disclosed in the Draft EIR. Therefore, the use of the data referenced in the comment is not required.

Response to Comment 10-7

The commenter correctly notes that the proposed project could increase peak hour traffic volumes using Sutter County intersections, resulting in unacceptable Level of Service (LOS) conditions under cumulative plus project conditions (see Draft EIR Impact 6.12-18). Draft EIR Mitigation Measure

6.12-18 requires the project applicant to pay its fair share of mitigation costs as defined in Mitigation Measure 6.12-1. This fair share funding would be a component of the bi-county agreement referenced in Mitigation Measure 6.12-1(8). The Draft EIR concludes that, while implementation of these mitigation measures would reduce this impact to a less than significant level, some of the identified roadway projects are outside the jurisdiction of Placer County. Caltrans, the City of Roseville, Sacramento County, SPRTA, and Sutter County can and should implement the suggested or similar mitigation measures but may choose not to. If the identified roadway projects are not implemented, the intersection of Riego Road and Pleasant Grove Road would continue to operate at an unacceptable level. Therefore, the County concluded Impact 6.12-18 is significant and unavoidable.

Response to Comment 10-8

The comment refers to the need for additional analysis of additional improvements along Riego Road. However, these improvements were not identified in the Draft EIR as necessary to reduce impacts on this roadway. The Draft EIR found that the intersection improvements identified in the traffic section would improve operations along this roadway to achieve Sutter County's level of service standard.

Response to Comment 10-9

As noted by the commenter, Draft EIR Impact 6.12-26 provides that mitigation measures implemented to reduce transportation impacts could adversely impact traffic in other jurisdictions. Mitigation Measure 6.12-26 requires Placer County to coordinate with the City of Roseville, Sacramento County, Sutter County and Caltrans to ensure the roadway improvements implemented in whole or in part as mitigation for the proposed project are designed to minimize impacts on existing and future roadways and intersections according to the LOS policies of affected jurisdictions.

The commenter states that "coordination on past projects has not been productive, nor has a 'legally enforceable' bi-county agreement been negotiated to date." After Sutter County commenced CEQA litigation against Placer County on the Placer Vineyards Specific Plan EIR, Placer County initiated efforts to establish a bi-county agreement with Sutter County, similar to the Memorandum of Understanding (MOU) established between Placer County and Sacramento County. To date, Sutter County has not responded to Placer County's efforts. As recognized in the Draft EIR, without Sutter County's cooperation in establishing such an agreement, the project's traffic impacts on Sutter County identified in the Draft EIR would remain significant and unavoidable. (Draft EIR, pp. 6.12-102, 6.12-112.) Placer County remains able and willing to commence negotiations with Sutter County to establish a bi-county agreement; however, active participation from Sutter County is required.

Response to Comment 10-10

Commenter requests that the adoption of the Final EIR be delayed until successful negotiations have been concluded and the necessary institutional and legal arrangements between Sutter and Placer counties to facilitate the project's payment of "fair share" traffic impact fees. As noted earlier, Placer County acknowledges and appreciates Sutter County's willingness to commence negotiations to establish this framework; however, CEQA does not require such agreements to be in place prior to project approval. See Response to Comment 10-9.

The County believes that the Draft EIR fully complies with CEQA and adequately identifies, analyzes, and mitigates all potentially significant impacts of the proposed project.



640 Fifth Street • Lincoln, California 95648 • www.ci.lincoln.ca.us

January 22, 2008

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

Subject: Draft EIR Regional University Specific Plan

Dear Ms. Krach

Thank you for the opportunity to comment on the Draft EIR for the Regional University Specific Plan. The following Draft EIR comments have been submitted for your consideration.

Planning and Approved Development in the RUSP Vicinity

In reviewing this section it was noted that no mention was made of the City of Lincoln's Draft 2050 General Plan, which has previously circulated its Draft EIR, SCH No. 2005112003. The Draft 2050 plan is later discussed in the Transportation and Circulation portion of the document however the reader is not provided any basic information about the nature of the plan. We would suggest adding a general description of the City's Draft 2050 General Plan to this section of the RUSP EIR, as well as revising Figure 4-1 to reflect the planning boundaries of the 2050 Plan.

11-1

Demographic/Proposed Project Housing Supply

In the City's March 31, 2005 comment letter on the Notice Of Preparation for this project it had been requested that the document evaluate the projects potential impacts on housing in the surrounding jurisdictions. The Draft RUSP EIR identifies an enrollment of 6,000 students at the University and the provision of 750 student housing units capable of holding some 1,500 students. It is not clear from the analysis how the remaining 4,500 students will be housed and where they will reside. The Draft EIR should evaluate the potential impact on the housing stock of the surrounding jurisdictions.

11-2

Transportation and Circulation

The City of Lincoln requested in writing during the Notice of Preparation period that the EIR provide a modeling effort that addresses impacts to the City of Lincoln based upon the most current information available. The document however does not appear to provide the requested analysis. Under the Local Regulations section of the traffic analysis a listing is provided of the various levels of service required by surrounding jurisdictions as acceptable. This included information for Placer County, the City of Roseville, Sacramento County and Sutter County, but no information is provided regarding City of Lincoln standards for an acceptable level of service. It is not clear from this information whether an analysis of impacts to the City of Lincoln roadways was conducted.

11-3

Based upon a review of the information presented in Figure 6.12.2, (Existing Conditions) the traffic analysis evaluated conditions as far west as State Highway 70 & 99 and south to Antelope Road, but does not include any evaluation north of Sunset Blvd. It is not clear from the information presented if any traffic analysis was conducted on roadways and intersections within the City of Lincoln. In a similar manner while mention is made of the Lincoln SOI Expansion area under the cumulative conditions forecasts no analysis relating to City roadways and intersections is presented in the document. With no information presented in the analysis regarding level of service standards for the City of Lincoln it appears that no evaluation was made in any of the scenarios regarding potential impacts to roadways and intersections within Lincoln or its planning boundaries. As such, it would appear that potentially significant impacts within the City of Lincoln have not been fully considered nor disclosed within the document.

11-4

Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Rodney Campbell
Director Community Development

cc: Gerald Johnson
John Pedri

LETTER 11: CITY OF LINCOLN, RODNEY CAMPBELL**Response to Comment 11-1**

The comment states that the Draft EIR does not provide any information on the nature of the City of Lincoln's ongoing General Plan Update process. The City of Lincoln's adopted existing General Plan has a projected build-out population of 54,100 and the City's existing adopted Sphere of Influence has the potential capacity of 87,600 persons. The City of Lincoln's Draft 2050 General Plan Update (GPU) includes amending the existing Sphere of Influence to accommodate a projected population of 132,000. The Recirculated Draft Program Environmental Impact Report (RDEIR) (SCH #2005112003) was circulated for review from July 16, 2007, through August 29, 2007 and the Draft 2050 GPU was approved March 25, 2008. During the preparation of the RUSP Draft EIR, the City had not adopted the General Plan Update. Therefore, the City's former adopted General Plan was referenced in the Draft EIR analysis and not the newly-adopted 2050 General Plan. Because the analysis in the Draft EIR was based upon the General Plan that was relevant at that time, the boundaries of Figure 4-1 on page 4-3 of the Draft EIR are not amended, nor is language included in the traffic section of the Draft EIR.

Response to Comment 11-2

The comment states that the proposed University would only have housing for 1,500 of the planned 6,000 students and requests information as to where the remaining students would reside. As shown in Table 5-3 on page 5-10 of the Draft EIR, in addition to the on-campus housing (which also includes capacity for a population of 825 in faculty housing and 135 retirement housing), the community portion of the project includes 931 high-density, 1,508 medium-density, and 718 low-density units for a total estimated capacity of 7,427. In all, the proposed project would provide housing for an estimated 10,037 persons, which would be more than sufficient to accommodate all of the students at the University. The Draft EIR does not speculate, however, about where the 4,500 students, who do not live on campus, would choose to locate. It should also be noted that the development of the University would be phased; consequently, not all of the 6,000 students would come to the campus upon its opening.

Response to Comment 11-3

The transportation modeling effort relied on the Placer County travel demand model as discussed on Page 6.12-45 through 6.12-51 of the Draft EIR. This model included the City of Lincoln and the transportation impact analysis considered potential effects of project traffic in Lincoln. To help identify potential transportation analysis locations for the Draft EIR, the model was used to forecast the project traffic distribution on the regional roadway network. The model forecasts along with other information, such as regional land use distribution and existing traffic patterns, were used to establish the project traffic distribution used in the Draft EIR and shown in Figure 6.12-9. As shown in the figure, less than four percent of project traffic was forecast to have origins or destinations north of Blue Oaks Boulevard. Even less project traffic had origins or destinations in the City of Lincoln. Therefore, no further evaluation of City of Lincoln roadways was deemed necessary.

Response to Comment 11-4

Please refer to Response to Comment 11-3.



City of Rocklin

January 23, 2008

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

RECEIVED

JAN 24 2008

SUBJECT: Comments on Regional University Specific Plan Draft EIR ENVIRONMENTAL COORDINATION SERVICES

Dear Maywan:

Thanks for the opportunity to review the above-referenced document. The City of Rocklin has completed its review and has the following comments:

1. Water Supply

The mitigation measures for water supply impacts include an obligation for PCWA to analyze remaining capacity in the City of Roseville's system, with a stipulation that the analysis shall consider all of the previously committed demand to Morgan Creek, Placer Vineyards, Regional University or other projects within southwest Placer County that rely on water conveyed through City of Roseville facilities and/or pursuant to the wheeling agreement between the City of Roseville and PCWA, as amended from time to time. The City of Rocklin has conceptually approved a Downtown Plan that intensifies both residential and commercial development in the City's downtown area and thus creates a greater water demand than currently envisioned within that area. For this reason, the City requests that any future water supply analysis that is conducted by PCWA includes and acknowledges the water supply needs of the City's Downtown Plan.

12-1

Additionally, several of the water supply mitigation measures obligate the PCWA to conduct analyses and studies. The mitigation measures should, specify that the Regional University project is responsible for the funding of such PCWA efforts.

12-2

2. Traffic

a. The traffic analysis of intersections in the cumulative condition did not include the future Whitney interchange at State Route 65. Although such interchange was included as part of the Placer Parkway analysis, and because the certainty and timing of the Placer Parkway is unknown, the analysis of the Whitney interchange at State Route 65 without a Placer Parkway is needed. The traffic analysis should examine project impacts at the future Whitney interchange, and if impacts are identified, funding participation on behalf of the project should be identified as a mitigation measure.

12-3

Information 916.625.5000

- b. The intersection of Blue Oaks Boulevard and State Route 65 is shown to be LOS F in the cumulative condition. What improvements were assumed at this location, and is the poor LOS a function of not enough capacity on State Route 65, or is it more of a localized problem? 12-4
- c. The Trip Generation estimate calculated 58,996 new trips and then deducted 25,981 trips as internal trips, for a new trip total of 33,015. The discussion notes that the internal trip reduction of 44% was based on studies of the UC Davis campus. An internal trip reduction of such magnitude appears to be overly optimistic, even for a university-based project. The traffic analysis elsewhere notes that the 2000 Census indicates that 90% of Placer County residents use an auto for home to work trips and that 1% of Placer County workers use public transportation, and although such information is not given for Yolo County or the City of Davis, presumably the statistics in those jurisdictions would demonstrate greater percentages. Given that the UC Davis and the City of Davis utilize public transit and alternative modes of transportation at a much higher rate than Placer County, and given that the City of Davis has a much more compact base of commercial and personal services directly adjacent to the campus, the application of UC Davis traffic information to a Placer County university is not appropriate and the trip generation rate that was established should be re-examined. 12-5

The traffic analysis also utilizes UC Davis information to estimate trips and parking demand for special event conditions at the proposed stadium. Again for the reasons put forth above relative to higher rates of the use public transit and alternative modes of transportation in Davis as compared to Placer County, the application of UC Davis traffic information to a Placer County university is not appropriate and the special event trip generation and parking demand should be re-examined. 12-6

If there are any questions or need for clarification on any of these comments, please contact David Mohlenbrok at (916) 625-5160. Thanks again for the opportunity to comment.

Sincerely,



Terry A. Richardson
Community Development Director

cc: Carlos Urrutia, City Manager
City Council Members
David Mohlenbrok, Senior Planner