# SECTION 3.0

**RESPONSES TO COMMENTS** 

#### 3.1 GENERAL RESPONSE TO COMMENTS

# General Response 1 – Impacts Associated with Alternative A Hidden Valley Force Main Alignment and the County's Selection of Alternative B as the Proposed Project

**Summary:** Numerous comments were submitted on the Draft Environmental Assessment (EA)/ Environmental Impact Report (EIR) regarding potential environmental impacts resulting from the Alternative A force main segment that extends through the Hidden Valley Community Association's (HVCA's) open space area. Commenters expressed concern that the Alternative A force main alignment and pipeline upsize under Alternative C within the Hidden Valley open space area would result in impacts associated with: aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, hydrology, land use, noise, recreation, and traffic.

**Response:** Based upon information and input gained during the public review period for the Draft EA/EIR, Placer County (County) has identified a modified phasing of Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Please refer to revisions to the Draft EA/EIR Section 2.0, Alternatives, provided in **Chapter 4.0** of this Final EA/EIR. The new Phasing Option 2 of Alternative B, the County's Proposed Project, would result in the construction of the sewer force main entirely within the Auburn-Folsom Road and Joe Rodgers Road right-of-ways (ROWs) as follows:

- The first phase of the pipeline would extend from the Sewer Maintenance District (SMD) 3 wastewater treatment plant (WWTP) boundary south along Auburn-Folsom Road for approximately 13,100 linear feet (LF) connecting to existing pipelines near the intersection of Twin Rocks Road, near manhole (MH) G16-43. Connection to SMD 2 lines may be provided through the installation of a new MH(s) within County ROW or County owned property at the southeast corner of the intersection.
- The second phase would extend the pipeline an additional 10,150 LF south along Auburn-Folsom Road and then Joe Rodgers Road, ultimately connecting to the existing SMD 2 sewer pipelines near the intersection of Joe Rodgers Road and Itchy Acres Road.

Under Phasing Option 2 of Alternative B, the project components related to the pumping station, WWTP decommissioning, grading and drainage, sewer force main alignment and capacity, and project construction would be identical to Phasing Option 1 described and analyzed within the Draft EA/EIR. The modified phasing under Phasing Option 2 of Alternative B would require that the sand filter at the SMD 3 WWTP be re-purposed to provide equalization storage as opposed to emergency storage. As described within the Draft EA/EIR, future expansion of the existing SMD 2 gravity sewer downstream of MH E14-48 will be required to accommodate ultimate build-out of the SMD 3 service area in accordance with approved development densities in the Horseshoe Bar Community Plan. This future expansion would be subject to additional environmental review pursuant to the California Environmental Quality Act (CEQA).

As described within the revised text of Section 4.4 of the Draft EIS, presented in Chapter 4.0 of this Final EA/EIR, implementation of Alternative B would result in potentially greater effects associated with traffic, and the two pipeline crossings of Miners Ravine, all of which can be reduced to a less-than-significant level with the implementation of recommended mitigation measures within Section 3.0 of the Draft EA/EIR; however, it would avoid the potential effects associated with construction within the open space area of the Hidden Valley subdivision, including the removal of approximately 30 mature oak trees and the disturbance of 0.197 acres of riparian habitat (Alternative B would disturb 0.04 acres of riparian habitat). Therefore, in light of the greater potential for adverse impacts under Alternative A, the County has determined that Alternative B is the environmentally superior alternative. Refer to the revised conclusion/findings regarding the environmentally superior alternative in Section 4.4 of the Draft EA/EIR provided in Chapter 4.0 of this Final EA/EIR. All substantive changes to the environmental analysis in Section 3.0 of the Draft EA/EIR as a result of the new phasing option of Alternative B are presented within Chapter 4.0 of this Final EA/EIR. No new environmental impacts were identified as a result of the additional analysis. Should the County later decide to consider an alternative project, the environmental analysis shall be updated or revised as necessary to disclose all potentially significant impacts in accordance with CEQA and National Environmental Protection Act (NEPA).

#### 3.2 RESPONSES TO INDIVIDUAL COMMENTS

The following responses have been prepared for each bracketed comment included in **Chapter 2.0** of this Final EA/EIR. Once an issue has been addressed in a response to a comment, subsequent responses to similar comments reference the initial response. Accordingly, the reader is directed to the general response in **Section 3.1** as appropriate. This format eliminates redundancy where multiple comments have been submitted on the same issue. If necessary, the chapters in the Draft EA/EIR have been modified in response to comments, and the nature and the location of the modification is identified in the response and presented in **Chapter 4.0** of this Final EA/EIR.

#### Letter 1 - Pat Peterson, July 8, 2012

#### **Response to Comment 1-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts addressed by the commenter would not occur.

# Letter 2 – Sandra Casey-Herold, July 15, 2012

#### Response to Comment 2-1

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred

Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur.

# Letter 3 - Mark K. Bowers, July 21, 2012

### **Response to Comment 3-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternative A, addressed by the commenter, would not occur. Please refer to **Response to Comment 19-5** regarding the potential staging areas. The property proposed for use as a staging area at the corner of Twin Rocks Road and Auburn-Folsom Road is a previously disturbed County-owned property; therefore, no impacts to landscaping on private property would occur.

# Letter 4 – Robert D. Peterson, July 23, 2012

#### Response to Comment 4-1

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternative A, addressed by the commenter, would not occur.

# Letter 5 - Chris Sweeney, July 26, 2012

#### **Response to Comment 5-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts addressed by the commenter would not occur.

#### Letter 6 – Errol and Kelli Belt, July 27, 2012

#### Response to Comment 6-1

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur. Any blasting that may

be required to construct the proposed force main would be done within the proposed force main alignment, which is located entirely within the Auburn-Folsom Road and Joe Rodgers Road ROWs under Phasing Option 2 of Alternative B. As described within Section 4.5 of the Draft EA/EIR, coordination with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and California Department of Fish and Game (CDFG) is occurring in accordance with various Federal and State environmental laws and regulations. As of the publication of this document, no concerns have been raised by these agencies regarding the blasting that may occur during the construction of the Proposed Project.

### Letter 7 – Mark T. Mabie and Robbin Connerty, July 31, 2012

#### **Response to Comment 7-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur.

# Letter 8 – Bonnie Walker Forslin and Brent A. Forslin, July 31, 2012

### **Response to Comment 8-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur.

# Letter 9 – Ahmad Kashkoli, State Water Resources Control Board (SWRCB), July 31, 2012

#### **Response to Comment 9-1**

The County is not seeking Clean Water State Revolving Fund (CWSRF) financing for the Proposed Project. The EA/EIR is a joint document prepared to meet the requirements of both NEPA and CEQA. Should CWSRF financing be sought in the future, the EA/EIR would include the necessary elements needed to meet the standards of the CEQA-Plus documentation, with the U.S. Army Corps of Engineers (USACE) taking the lead in ensuring that it meets compliance requirements that fall under the Fish and Wildlife Coordination, Endangered Species, Magnusun-Stevens Conservation and Management, Water Quality, Clean Air, and National Historic Preservation Acts. As it pertains to the USACE overseeing NEPA and ensuring that all requirements are fulfilled to meet compliance with these Acts, and no acknowledgement that the USACE is the Federal agency providing reimbursement for the project, no comments were received from the Central Valley Regional Water Quality Control Board, the Placer County Air Pollution Control District, or the U.S. Environmental Protection Agency. The State Historic

Preservation Officer and USFWS have recently consulted and concurred with the USACE's effects analysis (see **Appendix B** of this Final EA/EIR). Native American consultation letters are included within **Appendix B** of this Final EA/EIR.

# Letter 10 – Tamsen Taylor, August 1, 2012

#### **Response to Comment 10-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts, addressed by the commenter, would not occur.

# Letter 11 – Osha R. Meserve, Soluri Meserve, a law corporation representing Hidden Valley Community Association, August 1, 2012

## **Response to Comment 11-1**

The commenter's request to be mailed and/or emailed notice of any and all hearing and/or actions related to the Proposed Project is noted.

# Letter 12 – Eleanor R. Grenfell, August 1, 2012

#### **Response to Comment 12-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A.

# Letter 13 – Kevin Console, August 2, 2012

#### **Response to Comment 13-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur.

# Letter 14 – Mark K. Bowers, August 2, 2012

# **Response to Comment 14-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment regarding the County's selection of Alternative B as the preferred force main alignment. Under the new Alternative B, the force main will connect to the SMD 2 pipelines near MH G16-43. Please refer to revisions to the Draft EA/EIR Section 2.0, Alternatives, provided in Chapter 4.0 of this Final EA/EIR. The force main and new MH connections will be located entirely within the County's ROW and County owned property, therefore no impacts to landscaping on private property would occur. Please refer to **Response to Comment 19-5** regarding the potential impacts from proposed staging areas.

# Letter 15 – Richard Sambucetti, August 3, 2012

# **Response to Comment 15-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur.

# Letter 16 - Sonja White, August 5, 2012

## **Response to Comment 16-1**

Please refer to General Response 1 above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur. Please refer to revisions to the Draft EA/EIR Section 2.0, Alternatives, provided in Chapter 4.0 of this Final EA/EIR. As described therein, in order to comply with County ordinance 9.36.030 and the Granite Bay Community Plan, construction activities will be limited to the hours of 6 am to 6 pm Monday through Friday and 8 am to 6 pm Saturday. Additionally, as described in Mitigation Measure 3.9-1, the County will designate a disturbance coordinator, such as an employee of the general contractor or the project manager for the County, post the coordinator's contact telephone number conspicuously around the project site, and provide the number to nearby sensitive receptors. The disturbance coordinator shall receive all public complaints, be responsible for determining the cause of the complaints, and implement any feasible measures to alleviate the problem. Compliance with this mitigation measure, as well as other mitigation measures identified in Section 3.0 of the Draft EA/EIR, will ensure that construction of the Proposed Project will result in minimal disturbances to sensitive receptors.

# Letter 17 – Paul Schmidt, Hidden Valley Community Association Board of Directors, August 5, 2012

#### **Response to Comment 17-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As described therein, the new Phasing Option 2 of Alternative B would result in the construction of the sewer force main entirely within the Auburn-Folsom Road and Joe Rodgers Road ROWs. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area. Please refer to the revisions Section 3.12 of the Draft EA/EIR provided in **Chapter 4.0** of this Final EA/EIR regarding potential impacts to the existing wastewater collections systems as a result of the Proposed Project. As stated therein, the direct and cumulative contribution to environmental effects resulting from the construction of new/expanded wastewater collection facilities under Phasing Option 2 of Alternative B is considered to be less than significant.

### Letter 18 – Barbara Pepper, August 5, 2012

#### **Response to Comment 18-1**

Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment. As discussed therein, Placer County has identified Alternative B (Phasing Option 2) as its "Proposed Project" instead of Alternative A. Implementation of the preferred Alternative B would not result in impacts to the Hidden Valley open space area; therefore, potential impacts of Alternatives A and C, addressed by the commenter, would not occur.

# Letter 19 – Osha R. Meserve, Soluri Meserve, a law corporation representing Hidden Valley Community Association, August 6, 2012

#### **Response to Comment 19-1**

Comment Noted.

#### **Response to Comment 19-2**

Comment Noted. Please refer to **General Response 1** above regarding the County's selection of Alternative B as the preferred force main alignment.

#### **Response to Comment 19-3**

The commenter's support of the County's determination to identify Phasing Option 2 of Alternative B as its Preferred Alternative is noted. The scope of comments is noted. As described in **General Response 1**, should the County later decide to consider an alternative project, the environmental analysis shall be updated or revised as necessary to disclose all potentially significant impacts in accordance with CEQA and NEPA.

A detailed description of Alternative B Phasing Option 2 has been added to Section 2.0 of the Draft EA/EIR and is presented in **Chapter 4.0** of this Final EA/EIR. As described therein, and shown on Figure 2-4b, the first phase of Alternative B Phasing Option 2 would extend from the SMD 3 WWTP boundary south along Auburn-Folsom Road for approximately 13,100 LF to existing pipelines near MH G16-43. Please refer to revisions to the Draft EA/EIR Section 2.0, Alternatives, provided in Chapter 4.0 of this Final EA/EIR. The force main and new MH connections will be located entirely within the County's ROW and County owned property. Under Alternative B Phasing Option 2, the construction activities, equipment, staging areas, and best management practices (BMPs) would be similar to those described in Section 2.4.3 and 2.5.3 of the Draft EA/EIR.

#### **Response to Comment 19-5**

As described within Section 2.4.3 of the Draft EA/EIR, staging areas would be utilized in areas near construction sites to store pipe and other materials, construction equipment, and other necessary items. The final determination on the location of staging areas for the Proposed Project would occur during the construction phase of the project. The Draft EA/EIR identified several County-owned properties along the alignment that could be used as contractor staging areas without the need to obtain an easement. These staging areas are shown in Figure 2-3 of the Draft EA/EIR. Should it be determined that alternative staging areas are necessary on private property, short-term staging areas would be negotiated by contractors prior to construction and, if needed, approved by the County. The mitigation measures and BMPs identified within Chapter 3.0 of the Draft EA/EIR would be implemented at any selected construction staging areas to avoid or minimize potential adverse effects associated with construction of the Proposed Project, including both County owned property and/or private property. This includes Mitigation Measure 3.11-1a, which requires that a Traffic Control/Traffic Management Plan be prepared and implemented by the County during the construction of the Proposed Project. The Traffic Control/Traffic Management Plan will be prepared in accordance with professional traffic engineering standards and in compliance with the requirements of Placer County's encroachment permit requirements. Measures within the Traffic Control/Traffic Management Plan will include, but will not be limited to: identifying specific construction methods to maintain traffic flows on affected streets; maintaining the maximum amount of travel lane capacity during non-construction periods and provide flagger control at sensitive sites to manage traffic control and flows; and limiting one-way traffic control to off-peak hours (8:30 am to 3:30 pm). Furthermore Mitigation Measure 3.11-1b requires that the County shall inform the public and local bicycling clubs of scheduled lane closures and/or detours (if required) through public outreach such as attendance at the Municipal Advisory Council (MAC) and postings in the local newspapers. These measures will minimize the Proposed Project's effect on traffic.

#### Response to Comment 19-6

As described in Section 2.5.3 of the Draft EA/EIR, the proposed force main under Alternative B, Phase 1, will cross Miners Ravine at two locations along Auburn-Folsom Road near the intersections of Twin Rocks Road and Willow Lane. Phase 2 of the force main would be installed under Miners Ravine using jack and bore tunneling or directional drilling construction methods that would avoid disturbing the ground surface

within the bed, bank, and channel of Miners Ravine. Both methods were described and analyzed within the Draft EA/EIR. The method of installation will be determined during the final design phase.

#### **Response to Comment 19-7**

Please refer to Section 3.3.3 and 3.7.3 of the Draft EA/EIR for a discussion of mitigation measures to avoid or minimize potential adverse effects associated with biological resources and hydrology and water quality. Also, refer to the Final Mitigation, Monitoring, and Reporting Plan (MMRP) included as **Appendix A** of this Final EA/EIR.

#### **Response to Comment 19-8**

As described in Section 3.12.3 of the Draft EA/EIR, as part of the design phase of the proposed project alternatives, extensive modeling was done to estimate the respective capacity needs for SMD 2 and 3, investigate opportunities for phasing construction, and estimate "trigger points" that alert when growth within the sewer sheds would require additional capacity to accommodate future growth. Hydraulic modeling indicated that SMD 2 pipelines located between MH I17-10 and MH G16-43, and MHF15-13 and F15-16 would require additional upsizing to convey current SMD 2 and SMD 3 PWWF if SMD 3 flows were conveyed through the SMD 2 sewer at MH I17-10. SMD 2 sewers downstream of MH F15-19 would have some additional capacity available to allow a phased construction approach. The future PWWF of 0.77 mgd was identified as the "trigger point" for when capacity of the existing SMD 2 sewer downstream of MH F15-19 would be reached and construction of the remaining force main to connect to MH E14-48 would be required. As presented in Chapter 4.0 of this Final EA/EIR, the analysis of potential impacts to existing wastewater collection systems (Section 3.12 of the Draft EA/EIR) has been expanded to discuss Alternative B Phasing Option 2. As stated therein, under Alternative B Phasing Option 2, sufficient equalization storage capacity will be provided at the SMD 3 WWTP site to eliminate the need to upsize the SMD 2 pipelines located between MH F15-13 and MH F15-16. The equalization storage capacity requirements were determined based on hydrologic modeling. Additionally, the direct and cumulative contribution to environmental effects resulting from the construction of new/expanded wastewater collection facilities under Alternative B Phasing Option 2 is considered to be less than significant.

# **Response to Comment 19-9**

As described in Section 2.0 of the Draft EA/EIR, air release and blow off valves will be designed in accordance with Placer County Standard Details and will include a carbon filter for odor control. As stated in Section 3.2.3 of the Draft EA/EIR, with the implementation of these odor control systems, potential odors from the force main would be mitigated, minimizing nuisance or annoyance to the public. Easements will be required for any valves located outside of County-owned properties or ROW. As described by the commenter in Comment 19-48, any new easement requested within the Hidden Valley subdivision would need to be approved by the HVCA in accordance with its 1953 Articles of Incorporation. The exact location and number of valves will be determined in the final design phase and any easements will be negotiated by the County or contractors prior to construction. As noted in **General Response 1**, Alternative B Phasing Option 2 would occur entirely within the Auburn-Folsom Road and Joe Rodgers Road ROWs and is not expected to require easements from the HVCA.

Because the need for Phase II of Alternative B Phasing Option 2 is based on anticipated population growth within SMD 3, the exact timing of the construction is unknown; however, as stated in Section 2.5.2 of the Draft EA/EIR, hydraulic modeling indicates that construction of Phase II will be triggered in 2021 based on assumed growth rates. As described in Mitigation Measure 3.11-1a, advanced warning of construction activities will be posted to allow motorists to select alternative routes in advance. Additionally, as described in Mitigation Measure 3.9-1, the County will designate a disturbance coordinator, such as an employee of the general contractor or the project manager for the County, post the coordinator's contact telephone number conspicuously around the project site, and provide the number to nearby sensitive receptors. The disturbance coordinator shall receive all public complaints, be responsible for determining the cause of the complaints, and implement any feasible measures to alleviate the problem. Compliance with these mitigation measures as well as other mitigation measures identified in Section 3.0 of the Draft EA/EIR will ensure that construction and operation of the proposed project will result in minimal disturbances to Hidden Valley residents.

### **Response to Comment 19-11**

Please refer to **Responses to Comments 19-4** through **19-10** regarding specific clarifications requested by the commenter. The commenters desire to coordinate with the County on these issues is noted.

#### **Response to Comment 19-12**

The project description within the EA/EIR is adequate to meet CEQA requirements and includes sufficient detail for meaningful comments. Section 2.0, and Figures 1-2, 1-3, 2-1, and 2-4 of the Draft EA/EIR clearly identify the alignment and location of the Proposed Project (Phasing Option 2 of Alternative B) and alternatives. A discussion of specific areas that would be impacted during construction and operation of the Proposed Project is provided within each of the subsections within Section 3.0 of the Draft EA/EIR. Please refer to **Responses to Comments 19-4** through **19-11** regarding specific clarifications requested by the commenter. As noted in **General Response 1**, no additional environmental impacts were identified as a result of the additional analysis.

#### **Response to Comment 19-13**

The "baseline conditions" for each issue area are accurately presented under the Affected Environment / Environmental Setting subsections in each respective section of the analysis within the Draft EA/EIR. Please refer to **Responses to Comments 19-14** and **19-15** regarding specific concerns related to the project setting and impacts.

#### **Response to Comment 19-14**

The scope of the impact analysis was determined by the USACE and the County based on comments received during the scoping period and the results of the initial study (See Chapter 1.0 of the Draft EA/EIR). As described throughout Section 3.0 of the Draft EA/EIR, the thresholds/basis of significance listed for each respective issues area were developed by the lead agencies based on Appendix G of the

CEQA *Guidelines* and relevant agency thresholds. Therefore, the thresholds of significance within the EA/EIR are adequate to meet CEQA and NEPA requirements.

The EA/EIR adequately addresses all potentially significant impacts resulting from the Proposed Project, including a detailed analysis of impacts as a result of decreased flows in Miners Ravine. A hydrologic study was conducted to evaluate the effects that the decommissioning of the SMD 3 WWTP site would have on stream flows in Miners Ravine and included as Appendix I to the Draft EA/EIR. As stated in Section 15150 of the 2012 CEQA Guidelines, an EIR may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public; therefore, references to the technical information included within Appendix I are appropriate.

As concluded within the hydrologic study (Appendix I to the Draft EA/EIR), and discussed in Sections 3.3 (Impact 3.3-2) and 3.7 (Impact 3.7-2) of the Draft EA/EIR, the elimination of wastewater discharge to Miners Ravine would not significantly affect stream stage or habitat suitability for fisheries resources downstream of the SMD 3 WWTP.

### **Response to Comment 19-15**

The commenter's discussion of general CEQA and NEPA requirements is noted. The analysis of potential environmental impacts from the construction and operation of the Proposed Project within EA/EIR is adequate to meet CEQA and NEPA requirements, including those listed by the commenter.

### **Response to Comment 19-16**

The commenter's discussion of general CEQA requirements regarding mitigation measures is noted. Please refer to **Responses to Comments 19-17** through **19-47** regarding the commenter's specific concerns regarding the environmental analysis and recommended alternatives.

#### **Response to Comment 19-17**

The commenter is unclear as to what additional biological setting information is needed to properly analyze the potentially significant impacts of the Proposed Project on biological resources. As such, a response cannot be provided.

The commenter indicates that the DEIR fails to reference or rely on the Miners Ravine Habitat Assessment prepared by the Department of Water Resources (DWR) in 2002. Please refer to Page 3.3-32 of Section 3.3 of the Draft EA/EIR which states the following:

"Although there are no CNDDB records documented for this species within five miles of the project site (CDFG, 2003) a study conducted by the California Department of Water Resources (DWR, 2002) reports that DFG fisheries biologist Titus observed juvenile steelhead trout in Miners Ravine at Dick Cook Road in 2001 providing evidence of spawning in the upper reaches of Miners Ravine. While there are numerous barriers to migration downstream of the SMD 3 WWTP noted in the DWR report the document does indicate that steelhead do have the potential

to access the upper reaches of Miners Ravine during peak winter stream flows. As such, Miners Ravine provides suitable habitat for this species."

This excerpt from Section 3.3 of the Draft EA/EIR both references and relies on the information contained in the noted 2002 Department of Water Resources report. In addition, the Hydrologic Study provided as Appendix I expands upon the reference and discussion of this DWR document and its conclusions regarding salmonid habitat quality within Miners Ravine. Also refer to **Response to Comment 19-14**.

## **Response to Comment 19-18**

The commenter notes that burrowing owl and Swainson's hawk were not addressed in the Draft EA/EIR and that they have the potential to occur in the project area. Appendix E of the Draft EA/EIR contains a California Natural Diversity Database (CNDDB) list of species documented to occur within the quadrangles containing the project area. This list does not indicate that either species noted by the commenter is documented to occur within the project area. In addition, the proposed force main alignment for the preferred alternative (Alternative B Phasing Option 2) is predominantly located in the roadway; in the areas where the project alignment deviates from the existing roadway (within ROW easements) there is no suitable habitat for either of these species. Protocol level surveys are only required if the project area contains suitable habitat and/or there are documented occurrences of these species within the project site and vicinity. Because the project area does not contain suitable habitat for Swainson's hawk or burrowing owl, no further protocol surveys or documentation is required. Furthermore, numerous biological surveys were conducted spanning May 2011 through March of 2012 for which no observations of the noted species were made. The USACE consulted with the USFWS and has recently received a Coordination Act Report (CAR) which concurs with the effects analysis on the affected riparian and oak woodland habitats, prepared by the USACE, and proposes mitigation for Alternative B as disclosed in the June 2012 Draft EA/EIR. The concurrence letter and CAR is included within Appendix B of this Final EA/EIR.

The commenter also notes that acoustical study is necessary given the assertion that field surveys for bats are difficult to execute and often inaccurate. CEQA requires, as does the USACE in order to determine a Finding of No Significant Impact, that mitigation measures are implemented to reduce potential impacts to a less-than-significant level; acoustical surveys are not required to avoid and mitigate potential impacts to bats. The preferred alternative includes the crossing of two bridges along Miners Ravine. Mitigation Measure 3.3-3b ensures that no impact would occur to Pallid Bat if this species is present. In their CAR, the USFWS did not recommend any additional mitigation measures beyond those discussed in the June 2012 Draft EA/EIR for implementation of Alternative B.

#### **Response to Comment 19-19**

The January 25, 2012 technical assistance letter from NMFS was considered during preparation of the Draft EA/EIR and hydrologic study included as Appendix I. After issuance of the technical assistance letter, follow up consultation with NMFS was conducted including numerous phone calls and attendance at a site visit. The methodology of the hydrologic study and analysis within the Draft EA/EIR was developed based on the results of scoping, informal consultation with NMFS, USFWS, CDFG, USACE and Placer County, and results of data review and field studies as described in Section 3.3, pages 16-17

and Appendix I of the Draft EA/EIR. The hydrologic study provides a basis for evaluating potential impacts to salmonids. In accordance with Section 7 of the Endangered Species Act, the USACE has prepared a Biological Assessment and initiated formal consultation with NMFS regarding potential impacts to Federally listed fish species and its critical habitat. USACE approval of the project will not occur until NMFS has concurred that the Proposed Project is unlikely to adversely affect fisheries or issues a Biological Opinion. In the event that a Biological Opinion is issued, all minimization and avoidance measures identified as conditions of approval will be implemented.

The commenter notes that the NMFS technical assistance letter dated January 26, 2012 explicitly states that both fall run Chinook salmon and California Central Valley Steelhead (CCVS) need to be considered. Both of these species were considered in the development of the hydrologic study (Section 2.2) and are discussed in DEIR pages 3.3-16 and 3.3-17. While steelhead are primarily discussed in the Hydrologic Study with regard to life history requirements and the potential effects from stage reductions (due to their potential for occurrence within the study reach) it should be noted that Chinook salmon require a greater depth for passage; at these higher stages the proportion of supplemental stream flow would be greatly reduced and the effect to Chinook salmon would be even more negligible than for steelhead. As such, no impacts would occur to Chinook salmon from the implementation of the project. While potential impacts to Essential Fish Habitat (EFH) for Chinook salmon were discussed and evaluated within the Draft EA/EIR, fall run Chinook salmon is not documented to occur in the area where the hydrologic study was conducted as noted in Table 3.3-1 and under the discussion of Fisheries in Section 3.3.2 page 3.3-16 of the Draft EA/EIR.

Additionally, many of the additional studies recommended by NMFS were determined not to be appropriate or attainable given the fact that Miners Ravine is an ungaged stream with no available records for historic water quality, stream flow, and CDFG fish survey data. The instream flows evaluated during the study were limited to two distinct flow regimes due to local weather patterns and hydrologic trends in Miners Ravine; these environmental conditions are considered uncontrolled variables.

A detailed BMP plan for the project will be included in the Stormwater Pollution Prevention Plan (SWPPP) as part of the National Pollutant Discharge Elimination System (NPDES) permitting for the project. Mitigation Measure 3.7-1a ensures that impacts to water quality will be less than significant with the implementation of the SWPPP. The SWPPP will include a detailed BMP plan which will evaluate each potential source of sediment along the project alignment and will require BMPs for each unique soil, slope, and drainage pathway to surface waters. This plan will ensure that erosion and sedimentation is reduced to a less-than-significant level.

It should be emphasized that the purpose and need for the Proposed Project is to comply with Waste Discharge Requirements adopted by the Central Valley Regional Water Quality Control Board (CVRWQCB) for the SMD 3 system by ceasing discharge into Miners Ravine. As such, the decommissioning of the SMD 3 WWTP will eliminate discharges that could contribute towards exceedance of Basin Plan Water Quality Objectives and will functionally increase the quality of water in Miners Ravine.

The commenter notes that there were numerous deficiencies in the Hydrologic Study (Appendix I). As stated in **Response to Comment 19-19**, the Hydrologic Study was designed and prepared in consultation with NMFS, CDFG, and USACE, with the intent to sufficiently and accurately make conclusions regarding potential effects to fisheries resources based on observed reductions in stage resulting from cessation of the SMD 3 discharge. As discussed in Section 5.2 of the Hydrologic Study the changes observed during the study resulted in a negligible reduction to stream stage when considering steelhead life history requirements. Please see **Response to Comments 19-21** through **19-28** below.

### **Response to Comment 19-21**

Comment noted. While this environmental condition was not present during the study, it is shown in Table 2 of the hydrologic study that the occurrence of flows less than two cubic feet per second (cfs) were recorded in only ten percent of the observations made over the last 12 year period (2000 through 2011). In addition, during the most significant recent period of drought (2010), the average summer low flow period measured at R1 in Miners Ravine (June 1 through October 31) was 2.66 cfs while the average effluent discharge was 0.12 cfs during this period (n=153), which accounted for only 4.4 percent of the average unimpaired stream discharge during this timeframe. Additionally, when considering flow reductions in California coastal salmonid streams, CDFG and NMFS have developed DRAFT Guidelines to evaluate water diversion projects and contain threshold criteria to ensure that cumulative flow reductions (i.e. reductions via diversion or cessation of flows) are protective of salmonids life history requirements. These guidelines state that when cumulative reductions in streams are less than five percent that there is little chance of significant cumulative impacts (from a cumulative reduction in streamflow) and that the project does not require additional studies to assess these impacts. Using these criteria, the most recent low flow data for Miners Ravine, and with the results of the Hydrologic Study, it can be asserted that the reduction in stream flows from the proposed project would not have a significant impact to CCVS or Chinook salmon.

#### **Response to Comment 19-22**

Comment Noted. The evaluation of flow temperature relationships was determined not to be a relevant part of the analysis for the Hydrologic Study because during the development of the Study parameters, and in consultation with NMFS and DFG, it was clear that the SMD 3 discharge as regulated under the NPDES permit requires that all Basin Plan Water Quality Objectives be met for surface waters, including temperature. When considering that the temperature of discharged effluent would have met Basin Plan Water Quality objectives for temperature and the fact that the discharge accounted for approximately 3.2 percent (on average) of the mean stream flow in Miners Ravine over the last 12 years, it is unlikely that removal of this flow would affect the temperature observed within Miners Ravine.

# **Response to Comment 19-23**

Comment noted. The analysis of complex aquatic/terrestrial food web interactions based on the seasonality of streamflow was outside the scope of the Hydrologic Study and not necessary based on the results of the Hydrologic Study and the discussion presented in **Response to Comment 19-21**.

As stated in the hydrologic study, R1 was used to measure flow above the point of discharge before, during and after each data collection effort. Please reference Figure 1 of the Hydrologic Study (Appendix I) which shows the seven (not three) study transects (A-E) established for data collection that are clearly labeled on the inset map. Graphical sections were not deemed necessary as the report evaluated the mean change in stage versus the change in discharge.

#### **Response to Comment 19-25**

Comment noted. Changes in stage were plotted against observed changes in flow for all transects measured to generate a mean stage/discharge relationship for the entire study reach. Table 4 of the Hydrologic Study shows the modeled changes in stage based on the average change in stage across each treatment transect versus the change in stream flow at each transect; this modeled relationship is linear based on the best fit line generated from the regression provided in Attachment 1 of the Hydrologic Analysis.

#### **Response to Comment 19-26**

Comment noted. Please refer to **Response to Comment 19-19** through **19-25**. A Hydraulic Engineering Center (HEC) analysis was not identified as a necessary requirement during the scoping and implementation of the study design with NMFS, CDFG, or the USACE.

### **Response to Comment 19-27**

Comment noted. While this difference in flow may or may not have been attributed to variability such as groundwater and surface water interactions or natural diurnal fluctuations in stream flow, the results from the study results are still valid because the regression equation was generated using the mean change in stage versus the mean change in flow across each transect over the two study dates.

#### **Response to Comment 19-28**

The t-tests were conducted using excels paired two sample for means analysis (e.g. the t-tests were run to evaluate whether there were significant differences between two normal data sets with the same measurement parameters with a standard five percent level of significance); the commenter is unclear as to how these are not replicable or unsubstantiated so a response cannot be provided. The statistics for the test does not report an R value. The commenter is not specific to how the correlation is 'false' and merely indicates that the R^2 value is incorrectly described for the t-test for which an R^2 value was not generated. As such, no further clarification can be provided.

#### **Response to Comment 19-29**

Preparation of an ecological study to evaluate habitat impacts from assumed sediment and/or accidental sewage discharges is not required. The Draft EA/EIR accurately describes the potential for impacts to habitat from potential sedimentation and upset conditions and recommends adequate mitigation to reduce all potential effects to less than significant. Mitigation Measure 3.7-1b includes a spill prevention and frac-

out contingency plan which would be implemented to prevent impacts to water quality from directional drilling under Miners Ravine. With implementation of Mitigation Measure 3.7-1a including the implementation of BMPs and compliance with the requirements included in the SWPPP prepared for the NPDES General Construction Permit, impacts to surface water and groundwater quality from construction activities would be considered less than significant. In addition, adherence to standard engineering practices and County Code design and maintenance requirements would prevent failure of the sewer force main; thus, accidental discharge of sewage from pipe failure is highly unlikely and does not require mitigation.

#### **Response to Comment 19-30**

None of the proposed alternatives in the DEIR include construction within Miners Ravine. In addition, Table ES-1 Impact 3.3-2 contains Mitigation Measure 3.7-1a, Obtain Coverage under the SWRCB NPDES General Permit and Implement Water Quality BMPs to Prevent Sedimentation and Erosion, and Mitigation Measure 3.7-1b, Prepare and Implement a Spill Prevention and Frac-out Contingency Plan. Implementation of these measures would reduce potential impacts to salmonids to a less-than-significant level. Further, the Alternatives that would include construction within or adjacent to the Hidden Valley Development are not preferred (Alternatives A and C) while the preferred Alternative B does not include construction in the Hidden Valley Development or open space areas contiguous with this development. Refer to General Response 1.

### **Response to Comment 19-31**

Comment noted. The USACE has requested a concurrence letter from NMFS on its effects analysis, wherein the USACE makes a finding that the Proposed Project may affect, but is not likely to adversely affect California Central Valley Steelhead (CCVS) and its critical habitat and Essential Fish Habitat (EFH) for Chinook salmon. If necessary, ESA Section 7 consultation between the USACE and NMFS will result in the issuance of a Biological Opinion (BO); this BO will specifically identify whether additional reasonable and prudent measures and/or mitigations would be required to offset potential take or reduce the potential for indirect impacts to occur from the implementation of the proposed project to CCVS or EFH for Pacific salmonids. Refer to Response to Comment 19-19 through 19-30 above.

#### **Response to Comment 19-32**

Impacts resulting from construction were analyzed and described in detail within Section 3.0 of the Draft EA/EIR. Mitigation measures were recommended where necessary to reduce all potentially significant effects to less than significant.

# **Response to Comment 19-33**

A comprehensive noise analysis is provided in Section 3.9 of the Draft EA/EIR. Noise is measured on an exponential scale; therefore, when two or more noise sources occur simultaneously, the resulting noise source is not the sum of the two (i.e. 85 dBA plus 82 dBA does not result in a noise level of 167 dBA, but rather a noise level of 87 dBA) (Caltrans, 2009, reference provided in Section 6.0 of the Draft EA/EIR). Impact 3.9-1 has been revised to clarify potential noise levels at construction sites from use of multiple

pieces of equipment at the same time. Please refer to revised Impact 3.9-1 in Section 4.0 of this Final EA/EIR.

#### **Response to Comment 19-34**

County Code Section 9.36.030 does not include the language quoted by the commenter. The language quoted by the commenter is found in County Code Section 9.36.080, which addresses requests for exceptions to the noise standards established within the code. With the implementation of Mitigation Measure 3.9-1, the project would be exempt from the noise ordinance, which is addressed in Section 9.36.030 of the Placer County Code and an exception to the noise code is not required. Additional language has been added to Mitigation Measure 3.9-1 to clarify that the project is exempt in accordance with County Ordinance 9.36.030. Refer to text revisions to Mitigation Measure 3.9-1 in Chapter 4.0 of this Final EA/EIR.

### **Response to Comment 19-35**

The commenter refers to General Plan Policy 9.A.5, which states that "(w)here proposed non-residential land uses are likely to produce noise levels exceeding the performance standards of Table 9-1 at existing or planned noise-sensitive uses, the County shall require submission of an acoustical analysis as part of the environmental review process so that noise mitigation may be included in the project design." Table 9-1 of the General Plan refers to new land uses, not construction activities, and thus would apply only to operational noise. Section 3.9 of the EA/EIR provides adequate analysis to assess the noise impacts of the Proposed Project and alternatives in order to meet the requirements of the County General Plan, NEPA, and CEQA.

#### **Response to Comment 19-36**

Comment noted. Mitigation Measure 3.9-1 has been modified to state that construction is limited to 6 am to 8 pm Monday through Friday and 8 am to 6 pm on Saturday in order to comply with County ordinance 9.36.030 and the Granite Bay Community Plan. Please refer to changes to Mitigation Measure 3.9-1 in Chapter 4.0 of this Final EA/EIR.

#### **Response to Comment 19-37**

Refer to General Response 1. The Proposed Project would not route the force main through the Hidden Valley open space area. Refer to **Response to Comment 19-33** regarding the County's exemption of construction noise and mitigation provided in the Draft EA/EIR which shows compliance with the section 9.36.030 of the County Code.

#### **Response to Comment 19-38**

As stated in Impact 3.9-5 of the Draft EA/EIR, there are no reasonably foreseeable construction projects in the vicinity of the Proposed Project; therefore, short-term increases in noise from construction of the Proposed Project would not contribute towards cumulative noise effect. As stated in Impact 3.9-5 of the Draft EA/EIR operation of the preferred Alternative would not increase the existing ambient noise level

over existing conditions; therefore, when analyzed in combination with future approved projects the preferred Alternative would not add to the future noise environment. As stated in the analysis of Alternative A, the proposed pump station would not produce audible noise at ground level, and the proposed stand-by generator would be operated on an emergency basis and would not generate noise levels over existing conditions at the WWTP. The analysis does not rely on high baseline noise levels to conclude that cumulative noise impacts would be less than significant.

#### **Response to Comment 19-39**

As described within Section 2.4.2 of the Draft EA/EIR, construction of the proposed force main would occur over two main phases. Construction of the force main/pipeline will be completed as described in Section 2.4.3 of the Draft EA/EIR in segments, to minimize the amount of open trenching within the roadway. Mitigation Measure 3.9-1 in the Draft EA/EIR provides that stationary and mobile noise sources be equipped with shielding or shrouding per the manufacturer's specifications. Mitigation Measure 3.9-1 has been revised to limit construction activities from 6 am to 8 pm Monday through Friday and 8 am to 6pm on Saturday in compliance with the Granite Bay Community Plan. Repaving Auburn-Folsom Road with rubberized asphalt to reduce noise is not necessary given the BMPs to reduce temporary construction noise included within Mitigation Measure 3.9-1 of the Draft EA/EIR. Given that construction will be continuously moving along the force main route and would not be audible by a given sensitive receptor for more than several days, vegetative plantings and earthen berms would not be an efficient noise attenuation measure for construction activities. There is sufficient vegetation both within and outside of the WWTP boundaries on the west, east, and north sides to reduce noise levels at nearby sensitive receptors.

#### **Response to Comment 19-40**

Mitigation Measure 3.9-1 of this Final EA/EIR has been modified in response to comments received on the Draft EA/EIR. Adequate mitigation measures are included in this Final EA/EIR to reduce identified impacts to less-than-significant levels in accordance with CEQA requirements. All mitigation measures pertaining to noise are included in the Final MMRP provided as **Appendix A** to this Final EA/EIR.

# **Response to Comment 19-41**

In accordance with Mitigation Measure 3.2-1, a Construction Emissions/Dust Plan shall be prepared and submitted to the Placer County Air Pollution Control District (PCAPCD). Approval of the Construction Emissions/Dust Plan by the PCAPCD would ensure project compliance with PCAPCD's Rule 228. Additional BMP's have been added to Mitigation Measure 3.2-1 to reduce particulate matter emissions during the construction phase of the project. Mitigation requiring the contractor to water exposed areas as needed would control fugitive dust emitted during earth moving activities; therefore, the addition of paving, using gravel cover, or spraying a dust control agent on haul roads is not necessary. Given the small area of earth moving activities, washing down all earthmoving construction equipment daily, and all haul trucks leaving the site is not warranted. Wind erosion mitigation is provided in Mitigation Measure 3.2-1 of the Draft EA/EIR and erosion control measures are discussed in Section 3.7, Impact 3.7-1, Mitigation Measure 3.7-1a of the Draft EA/EIR.

The potential for the HVCA water supply system to be upgraded in the future is noted. The County will coordinate with HVAC as appropriate to ensure the design of the Phase II pipeline avoids existing and future HVAC water lines.

#### **Response to Comment 19-43**

Generally, underground pipelines are designed to withstand earth and surface load pressures. The County will require that construction contractors consult with HVCA regarding the location of HVCA's water system pipelines and to ensure access to HVCA's operations /maintenance shed in the event that the potential Cavitt Stallman Road staging area is utilized. In order to avoid adverse effects on the HVCA water pipelines, Mitigation Measure 3.6-6 in Section 4 of this Final EA/EIR was added.

## **Response to Comment 19-44**

The parcel at the intersection of Twin Rocks Road and Auburn-Folsom Road, which was identified as a potential staging area and shown on Figure 2-3 of the Draft EA/EIR, is a previously disturbed site where sensitive biological resources are not present (see Section 2.4.3 of the Draft EA/EIR). As described in Section 3.3 of the Draft EA/EIR, with the implementation of mitigation, construction activities, including the use of the staging areas, will have a less-than-significant effect on biological resources. The commenter does not specify how the use of previously disturbed staging areas does not comply with the Biological Resource protection policies of the Granite Bay Community Plan.

In a subsequent meeting with the County, the commenter indicated concern that the construction activities proposed near Miner's Ravine would not meet the set-back requirements for streams. Policy 11 of the Granite Bay Community Plan Natural Resources Conservation Element states, "new construction shall not be permitted within 100 feet of the centerline of permanent streams and 50 feet of intermittent streams, or within the 100 year floodplain, whichever is greater." The intent of this policy can be more clearly understood through the Granite Bay Community Plan's Specific Policy for Preservation / Conservation of Natural Resources (2), which states, "Stream corridors must be kept free of structures and maintained in a natural condition...", clarifying that "new construction" applies to "structures". Structures are defined by the County's Zoning Ordinance (17.04.030) as an "...artifact constructed or erected, the use of which requires attachment to the ground, or over one hundred twenty (120) square feet in area or over six feet in height, or any structure that requires a building permit, including any building, but not including fences or walls six feet or less in height, or concrete flat work such as patios or planters less than twelve (12) inches in height." Since set back requirements apply specifically to structures, they would not apply to activities associated with use of the site for staging activities (e.g. storage of equipment, vehicle parking, etc.) or underground public utilities.

As discussed in detail under Impact 3.3-4 of the Draft EA/EIR, implementation of Mitigation Measure 3.3-4 of the Draft EA/EIR would ensure that use of the County owned property as a staging area would not result in impacts to riparian vegetation, and implementation of Mitigation Measure 3.7-1a of the Draft EA/EIR, would prevent discharge of pollutants to surface waters during construction. With mitigation, the Proposed Project complies with all biological policies of the Granite Bay Community Plan, including Policy

8 which states that "All stream influence areas, including floodplains and riparian vegetation areas shall be retained in their natural condition, while allowing for limited stream crossings for public roads, trails, and utilities." A discussion of consistency with Granite Bay Community Plan biological policies is provided in Impact 3.3-6 of the Draft EA/EIR.

### **Response to Comment 19-45**

The commenter's position regarding whether the County maintains the necessary property interests for the Twin Rocks Road and Cavitt Road staging areas is noted. Please refer to Response to Comment 19-5 regarding the proposed staging areas. As describe therein, the final determination on the location of staging areas for the Proposed Project would occur during the construction phase of the project. The mitigation measures and BMPs identified within Chapter 3.0 of the Draft EA/EIR would be implemented at all selected construction staging areas to avoid or minimize potential adverse effects associated with construction of the Proposed Project, including potential impacts to traffic.

# **Response to Comment 19-46**

As described within the hydrologic study included as Appendix I of the Draft EA/EIR, the mean streamflow of Miners Ravine over an 11 year period (2000 – 2011) was 5.13 cfs and the mean discharge of treated effluent from SMD 3 WWTP over an 18 year period (1994 – 2012) was 0.163 cfs. Therefore, the discharge of treated water from SMD 3 WWTP made up approximately 3.2 percent of mean stream flows. This would not significantly affect the ponds within the Hidden Valley open space area fed by Miners Ravine or HVCA's firefighting capabilities. Furthermore, the Granite Bay Community Plan Policy 8.3.1 (1) requires the strict enforcement of the Uniform Building Code and the Uniform Fire Code which provides minimum requirements for water pressure for fire protection.

#### **Response to Comment 19-47**

Please refer to Response to Comment 19-46, no revisions to the EA/EIR are warranted.

#### **Response to Comment 19-48**

The commenter's discussion of the easements granted to the County to enable the construction of the existing combination gravity/pressure sewer line through common areas and individual parcels of the HVCA in 1973 is noted. As previously discussed, Phasing Option 2 of Alternative B is now the Preferred Alternative and would not require construction or operation activities to take place in the HVCA area; therefore, easements from the HVCA would not be required for the implementation of Alternative B. Regardless, the County would continue to consult with the HVCA regarding public utility projects within their property.

#### **Response to Comment 19-49**

Comment noted. Under the new Alternative B, the force main will connect to the SMD 2 pipelines near MH G16-43. Please refer to revisions to the Draft EA/EIR Section 2.0, Alternatives, provided in Chapter 4.0 of this Final EA/EIR. The force main and new MH connections will be located entirely within the

County's ROW and County owned property. No improvements to the County's SMD 2 sewer pipeline that extends through Hidden Valley are proposed under the County's Preferred Alternative B Phasing Option 2. The County will continue to maintain its facilities as allowed under the sewer easement and will coordinate with the HVCA as necessary.

#### **Response to Comment 19-50**

Please refer to **General Response 1** and **Response to Comment 19-48** above. The commenter's request for a detailed diagram of all proposed construction activities within and near Hidden Valley and discussion regarding protection of the property and easements and desire to cooperate with the County in regards to the Proposed Project is noted.

#### **Response to Comment 19-51**

Comment noted.

### **Response to Comment 19-52**

Comment noted. Approval from the SWRCB of a Petition for Change in the point of wastewater discharge pursuant to Water Code 1211 is listed as a project requirement in Section 1.10 of the Draft EA/EIR.

# **Response to Comment 19-53**

As discussed in detail in Section 3.3 of the Draft EA/EIR, the Proposed Project will not significantly affect flows in Miner's Ravine. Refer to **Response to Comment 19-19** through **19-30** above regarding the sufficiency of the analysis within the Draft EA/EIR and Hydrologic Study. Discharge from the SMD 3 WWTP to Miners Ravine represents less than 5 percent of average stream flows, and thus elimination of the discharge will not change Miners Ravine to an ephemeral watercourse.

#### **Response to Comment 19-54**

This Final EA/EIR properly analyses and mitigates all potentially significant impacts resulting from the Proposed Project in accordance with NEPA and CEQA. The County will continue to coordinate with HVCA as necessary through the construction process.