Letter 9

Foresthill Fire Protection District

P.O. Box 1099 Foresthill, CA 95631
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DISTRICT BOARD
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GARY V. HALL
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Placer County Community Development
3091 County Center Dr., Ste. 140
Auburn, CA 95603
C/O: Crystal Jacobsen

RECEIVED
FEB 25 2008
PLANNING DEPT.

February 5th, 2008

After my recent review of the latest draft Foresthill Community Plan and associated Environmental Impact Reports, I have a number of updates, corrections and concerns for the final document. I will itemize below the updates and corrections by document, page and section. As for the concerns with policy language, I will paraphrase the concern and look to the planning department or executive office of the county to make the appropriate corrections.

Revised Foresthill Divide Community Plan
Dated: November 2007

Page 3-66 Implementation #6

As part of the environmental review process, require demonstration that adequate fire flow can be provided to new developments.

Responsible Agency/Departments are listed as Planning Department and Placer County Fire District.

This should read:
Planning Department and Foresthill Fire Protection District, as all areas within the plan area serviced by municipal water are within the Foresthill Fire Protection District.

A

Page 3-70 Last Two Paragraphs

The 4th paragraph on this page talks about the district comprising of *72* square miles of the plan area. The district actual boundary is ***81*** square miles.

The last Paragraph of page 3-70 refers to the district working on a ***five year*** Capital Improvement Plan. This plan is going to the Board of Supervisors in the next two months. The correction needed is that the plan is a ***twenty year*** plan.

B

Page 3-71 Policy Statement 3.D.13-1

In the previous discussion on page 3-70, it is identified that an ISO rating of 9 or 10 is considered standard for unimproved lands. In this policy statement as written the Foresthill Fire Protection District would be encouraged to obtain an ISO 8 rating in its unimproved lands. This request would not be cost effective in the interests of the district and would require staffing and equipment needs well beyond the Districts financial ability at present time. C

Policy Statement 3.D.13-2 a.

This policy statement encourages the Foresthill Fire Protection District to achieve a response time of 3 minutes "run time" 70% of the time and 6 minutes 100% of the time. ***Due to the topography and travel routes within the community, this request is physically impossible or would require infrastructure well beyond the means of the community.*** **I would recommend that the district be encouraged to meet response time equivalent to those standards set by Sierra Sacramento Valley EMS Authority in the Districts exclusive ALS ambulance operating contract.** The response times are currently established as 15 minutes within developed areas and ASAP within undeveloped or "wilderness" areas. See attached appendix A. D

Policy Statement 3.D.13-3

The County shall encourage the Foresthill Fire Protection District to achieve a response time equal to its run time. *I'm not even sure what this means.* E

Policy Statement 3D13.5 & 3D13.6

Both policy statements should include the Foresthill/Iowa Hill Fire Safe Counsel, as this organization under the governance of the Foresthill Fire Protection District is currently and will continue to work of fire safe mitigation efforts. F

Policy Statement 3D13.11 thru 3D13.16

Both policy statements should include the Foresthill/Iowa Hill Fire Safe Counsel, as this organization under the governance of the Foresthill Fire Protection District is currently and will continue to work of fire safe mitigation efforts. G

Page 3-72 Implementation

1. Require new development improvement plans to be submitted to the Foresthill or Placer County Fire District and CDF for review and approval with regard to fire protection and emergency medical response prior to final map approval.

This statement needs to read: Require new development improvement plans to be submitted to the Foresthill Fire Protection District and CDF for review, ***they may also be required to be submitted to*** *the Placer County Fire District.*

H

All development plans within the "plan area" need to be reviewed and approved by the Foresthill Fire Protection District, as the district is the primary responding agency outside its district boundary's within the entire "plan area" as Placer County Fire does not have any resources in the immediate area. The CDF resources under contract with the county are not staffed approximately 8 months of the year. Even in the event that a Placer County Fire resource responds to an incident, the **Foresthill Fire Protection is the primary advanced life support response in the entire "plan area" for medical emergency care and transport.**

7. This implementation statement should include a link to the Foresthill/Iowa Hill Fire Safe Counsel web site on the Placer County web site.

I

8. We may want to use this implementation section to add language in regards to a long term funding source for development shaded fuel breaks. This language could be taken from the CSA district currently in place within the Monte Verde sub-division of Foresthill. This current CSA requires an assessment which funds the ongoing maintenance of the development fuel break which is governed, implemented and monitored by the Foresthill Fire Protection District.

J

Page 3-74 4th Paragraph

Often the first to respond to medical aids, deputies assist the California Department of Forestry and Foresthill Fire and Ambulance.

This sentence should read:

K

Often the first to respond to medical aids, deputies assist the Foresthill Fire Protection District.

The Foresthill Ambulance "or otherwise known as" the Safety Club no longer exist. The Foresthill Ambulance has been absorbed by the Foresthill Fire Protection District.

Page 3-80 Health Services

Ambulance service in the plan area is provided by AMR ambulance service out of Auburn (under contract with Placer County) and the Safety Club, a volunteer organization that provides emergency medical response to the community. ***This statement is completely incorrect.***

Ambulance service to the "plan area" is provided by the Foresthill Fire Protection District under contract with Sierra Sacramento Valley EMS Authority. The Foresthill Fire Protection District currently holds an exclusive operating contract for advanced life support services including transportation services for a geographical area of approximately 500 sq. miles. The entire "plan area" falls within this scope. L

Appendix B Page 3 H. Services and Infrastructure

M

The Foresthill Safety Club (ambulance / lifesaving service) should ***be removed from the document as this entity no longer exists.***

Appendix E Standards: 1.C.1-6

We may want to use this standards section to add language in regards to a long term funding source for development shaded fuel breaks. This language could be taken from the CSA district currently in place within the Monte Verde sub-division of Foresthill. This current CSA requires an assessment which funds the ongoing maintenance of the development fuel break which is governed, implemented and monitored by the Foresthill Fire Protection District. N

Revised Foresthill Divide Community Plan
Draft Environmental Impact Report
Dated: November 2007

Page 2-12 Table 2-2

I would like to see several additional approval and review criteria added to the table of Subsequent Permits, Approvals, Review and Consultation Requirements

1. Agency- Foresthill Fire Protection District
   Approval- Roadway design for egress and access of evacuees and/or emergency equipment

2. Agency- Foresthill Fire Protection District
   Approval- Required fuel break design with associated funding mechanism for on-going maintenance required for sub-divisions in excess of minor land division

O

3. Agency- Foresthill Fire Protection District
Approval- Hydrant lay-out and spacing requirements before final map approval

O cont.

Page 3-69 1st Paragraph

Paragraph reads that the Foresthill Fire Protection District is comprised of 72 square miles. The District is currently 81 square miles.

P

2nd Paragraph

Paragraph reads the Foresthill Fire Protection Districts is currently working on a **five** year plan. The District has completed a **twenty** year plan which will be going to the Placer County Supervisors for approval in the next two months.

Q

Page 3-71 Health Services

Paragraph currently reads - Ambulance service in the plan area is provided by AMR ambulance service out of Auburn (under contract with Placer County) and the Safety Club, a volunteer organization that provides emergency medical response to the community. ***This statement is completely incorrect.***

Ambulance service to the "plan area" is provided by the Foresthill Fire Protection District under contract with Sierra Sacramento Valley EMS Authority. The Foresthill Fire Protection District currently holds an exclusive operating contract for advanced life support services including transportation services for a geographical area of approximately 500 sq. miles. The entire "plan area" falls within this scope.

R

Page 3-75 Policy Statement 4.I.9.

The County shall ensure that all proposed developments are reviewed for compliance with fire safety standards by responsible local fire agencies per the Uniform Fire Code and other County and Local ordinances.

Following Placer Counties Lead, the Foresthill Fire Protection District has adopted the 2007 California Fire Code based on the 2006 International Fire Code.

S

Page 3-77 Policy Statement 8.C.2.

The referenced Policy Statement should have the word *"fuel"* added and the word *"or"* changed to *"and"*. The policy statement should read as follows:

The County shall require that discretionary permits for new development in fire hazard areas be conditioned to include requirements for fire-resistant vegetation, cleared fire **fuel** breaks, **and** a long term comprehensive fuel management program.

T

Page 3-82 Policy Statement 3.D.13-2

The County shall encourage the Foresthill Fire Protection District to maintain the following standards (expressed as average response times to emergency calls):

a. Property: The arrival of the first fire apparatus at the point of need within 3 minutes "run time" 70% of the time and 6 minutes 100% of the time.

Due to the topography and travel routes within the community, this request is physically impossible or would require infrastructure well beyond the means of the community. **I would recommend that the district be encouraged to meet response time equivalent to those standards set by Sierra Sacramento Valley EMS Authority in the Districts exclusive ALS ambulance operating contract.** The response times are currently established as 15 minutes within developed areas and ASAP within undeveloped or "wilderness" areas. See attached appendix A. U

Or

The language from **Page 3-75 Policy Statement 4.I.2. May be used**:

The County shall encourage local fire protection agencies in the county to maintain the following standards (expressed as average response times to emergency calls):

a. 4 minutes in urban areas
b. 6 minutes in suburban areas
c. 10 minutes in rural areas

Page 3-83 Policy Statement 3.D.13-9

The policy language references again the Uniform Fire Code. V

Following Placer Counties Lead, the Foresthill Fire Protection District has adopted the 2007 California Fire Code based on the 2006 International Fire Code.

Policy Statement 3.D.13-12

This policy statement should read: defensible space fire-resistant vegetation, cleared fire breaks and fuel breaks **"and"** a long-term comprehensive fuel management program. W

Page 3-157 Policy Statement 4.I.9.

The policy language references again the Uniform Fire Code.

X

Following Placer Counties Lead, the Foresthill Fire Protection District has adopted the 2007 California Fire Code based on the 2006 International Fire Code.

Page 3-162 Safety – Goal 1:

2. The policy language references again the Uniform Fire Code.

Y

Following Placer Counties Lead, the Foresthill Fire Protection District has adopted the 2007 California Fire Code based on the 2006 International Fire Code.

Revised Foresthill Divide Community Plan
Draft Environmental Impact Appendices
Dated: November 2007

No noted changes required or comments.

It is obvious that over the course of several years of development many components of the current Draft document are out of date. The Foresthill Fire Protection District has also undergone many significant changes within the past four years. I have tried to capture these changes within my comments and recommended document language. If you have any further questions in regards to my comments or recommendations please feel free to contact me.

Kurt E Snyder

Foresthill Fire Protection District
Fire Chief
530-36-2465

Appendix A

emergency use, and there are other ALS 9-1-1 ambulance(s) staffed and immediately available to meet performance standards as defined herein.

5. PROVIDER shall not permit any of its employees, including dispatchers, to perform services hereunder while under the influence of any alcoholic beverage, medication, narcotic, or other substance which might impair the employee's physical or mental performance.

6. Ambulance personnel shall be neat and clean in public; shall be properly identified by a name tag, company name and insignia, and the employee's level of prehospital care certification.

7. Employees shall treat other professionals, patients, and their families with professionalism and courtesy.

E. Response Times

1. Ambulance response times must meet the standards set forth in Exhibit "B", S-SV Policy, Reference # 415 attached hereto and incorporated herein by reference. Every in-service ambulance unit must be, (unless PROVIDER submits to AGENCY in writing, a modification) equipped and staffed to operate at the advanced life support (paramedic) level on all 9-1-1 ambulance responses.

2. PROVIDER shall have a written policy, and shall make all reasonable efforts to immediately notify the jurisdictional PSAP of the location from where the ambulance is responding.

3. PROVIDER shall submit a monthly response time compliance report, utilizing CAD data, or until available, the S-SV PCR data form to AGENCY.

4. PROVIDER may request that AGENCY issue a written response time waiver for a period of time. PROVIDER shall submit any Response Waiver Request in writing to AGENCY

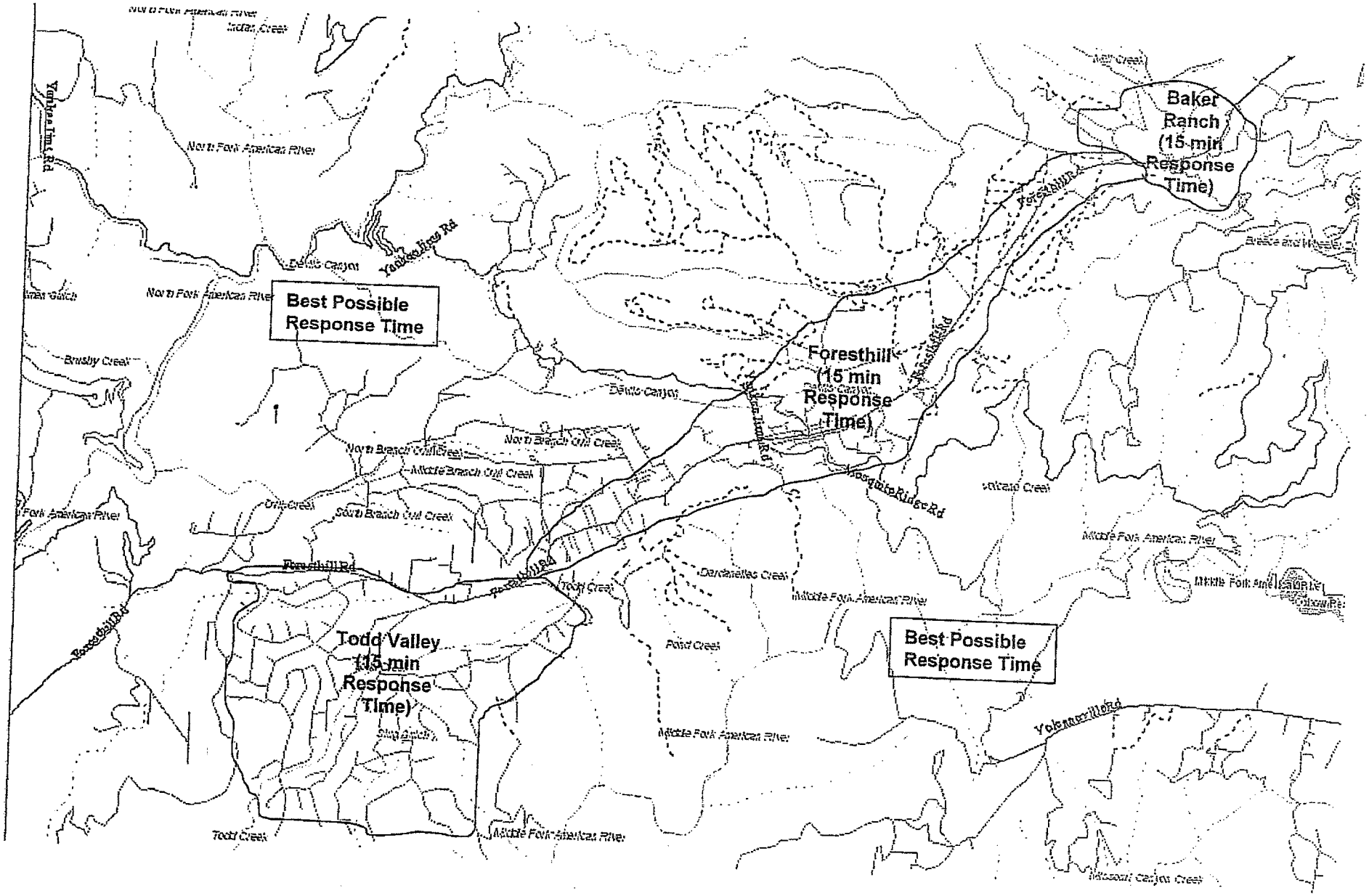
within ten (10) days of the circumstances that form the basis of the Response Waiver Request. The Response Waiver Request shall be detailed and articulate specific reasons for the request. PROVIDER'S Response Waiver Request may be prospective or retrospective depending on the circumstances. AGENCY shall issue its written decision on the Response Waiver Request within ten (10) days of its submission by PROVIDER. AGENCY may grant or deny any Response Waiver Request at its sole discretion.

5. The calculation of the ninety percent (90%) requirement shall be made on a monthly basis.
6. PROVIDER shall always inform the PSAP of such alternate service movements, the back-up providers estimated time of arrival (ETA) to the emergency and responding location, immediately upon dispatch.
7. If PROVIDER accepts mutual aid , PROVIDER shall assure that contractual response time requirements are met.
8. Within reasonable limits, PROVIDER agrees to provide automatic aid, back-up or mutual aid emergency ambulance services when requested by the AGENCY, an EMS Dispatch Center, a PSAP or by EMS providers from neighboring areas. PROVIDER shall ensure that response times are provided to AGENCY in PROVIDER'S monthly report.
9. In the event that the monthly operations report indicates that PROVIDER has not met the 90% response time standard, PROVIDER shall prepare and submit, with the monthly operations report, a written plan which shall detail the corrective actions to be taken by PROVIDER to meet the response time standard, and the time frame for those corrective actions to occur.

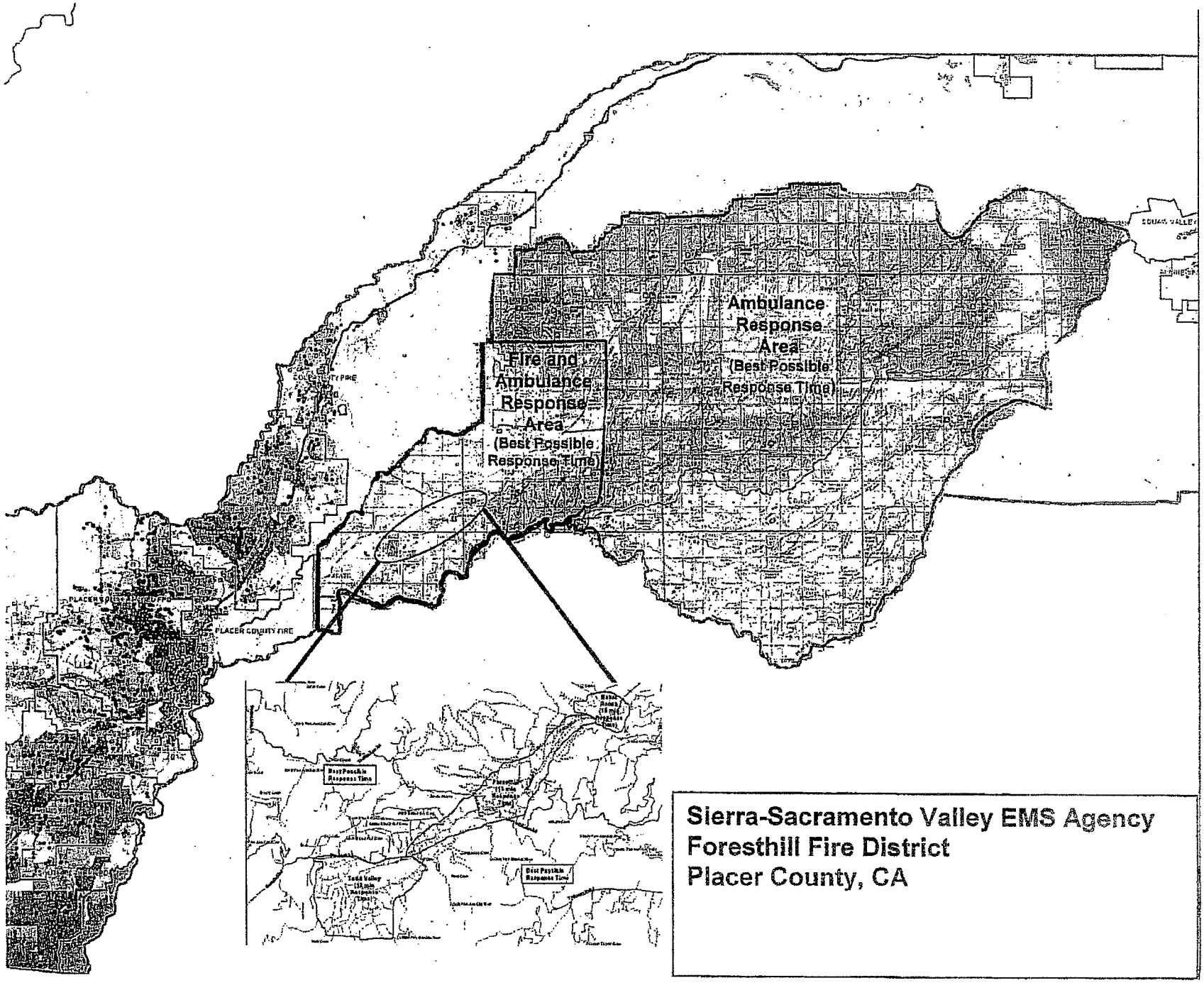
10. PROVIDER may enter into automatic aid agreements with adjacent provider with AGENCY as signator to the Agreement. The exclusive PROVIDER responsible for coverage of the effected area shall retain all rights and responsibilities for that exclusive area. When an automatic aid agreement exists, PROVIDER shall assure that contractual response time requirements are met.
11. PROVIDER will submit a monthly report to AGENCY that will include data mutually agreed to by the parties, i.e., personnel changes, station relocation, etc.
12. Upon installation, the AVL system shall be linked to Agency and provide full report capability.

F. Disaster/Emergencies

1. PROVIDER shall participate in countywide emergency disaster drills, affecting the Foresthill area in Placer County.
2. All field and supervisory personnel shall be trained in SEMS, Incident Command and the OES Region IV or other AGENCY approved plan as it relates to provision of emergency and disaster care.
3. At the scene of an emergency or disaster, PROVIDER shall follow the direction of the Incident Commander or the direction of the Unified Command except as provided in H&SC section 1798.6(a). This includes but is not limited to following directions pertaining to requesting additional resources.
4. PROVIDER shall respond, within PROVIDER'S capability, to any major emergency or disaster that may take place within COUNTY or adjacent counties within the Sierra-Sacramento Valley EMS region, when requested by DIRECTOR or duly authorized



Baker Ranch (15 min Response Time)
Best Possible Response Time
Foresthill (15 min Response Time)
Todd Valley (15 min Response Time)
Best Possible Response Time
North Fork American River
Devils Canyon
Yankee Jims Rd
Foresthill Rd
Mosquito Ridge Rd
Volcano Creek
Middle Fork American River
Dardanelles Creek
Pond Creek
Todd Creek
North Branch Cut Creek
Middle Branch Cut Creek
South Branch Cut Creek
Brushy Creek
Indian Creek
Mill Creek
Missouri Canyon Creek



Sierra-Sacramento Valley EMS Agency
Foresthill Fire District
Placer County, CA

SIERRA-SACRAMENTO VALLEY EMS AGENCY
PROGRAM POLICY

REFERENCE NO. 415-A

SUBJECT: 9-1-1 RESPONSE TIME CRITERIA –PLACER COUNTY

RESPONSE TIME STANDARDS	
PLACER COUNTY	
AMERICAN MEDICAL RESPONSE (AMR)	
Roseville	8 minutes 90% of the time
Rocklin	8 minutes 90% of the time
Auburn City & County All of the City of Auburn and County area – ½ mile West of Hwy 49 from the City of Auburn to Dry Creek Road. East of Hwy 49 up to and including Interstate 80 North to include Bell Road. In addition, ½ mile East of Hwy 49 from Bell Road to Dry Creek Road.	8 minutes 90% of the time
Auburn – East to include Colfax	15 minutes 90% of the time
Auburn West to Rocklin	15 minutes 90% of the time
Lincoln	10 Minutes 90% of the time
AMR Placer County Rural	20 minutes 90% of the time
AMR Placer County - Wilderness	As soon as possible
SOUTH PLACER FIRE PROTECTION DISTRICT	
South Placer FPD	10 minutes 90% of the time
FORESTHILL AMBULANCE	
Foresthill, Todd Valley Estates, Baker Ranch	15 minutes 90% of the time
Foresthill - Wilderness	As soon as possible
NORTH TAHOE FIRE PROTECTION DISTRICT	
Kings Beach and Tahoe City	10 minutes 90% of the time
Remainder of NTFPD	20 minutes 90% of the time
Wilderness	As soon as possible

Effective Date: 01/01/06
Next Review Date: 09/07
Approved:

Date last Reviewed / Revised: 09/05

William Koenig, M.D.
S-SV EMS Medical Director

Leonard R. Inch
S-SV EMS Regional Executive Director

Letter 9: Kurt E. Snyder, Fire Chief, Foresthill Fire Protection District

Response 9-A, 9-B, 9-C, 9-D, 9-E, 9-F, 9-G, 9-H, 9-I, 9-J, 9-K, 9-L, 9-M and 9-N: These comments address policies, implementation actions and standards included in the FDCP Policy Plan, not the DEIR, and do not raise a significant environmental issue that requires a response in this Final EIR. The comments have been noted and referred to Placer County staff.

Response 9-O: Table 2-2 found at page 2-12 of the DEIR is amended as follows at the request of the Foresthill Fire Protection District:

Table 2-2 Subsequent Permits, Approvals, Review, and Consultation Requirements

Agency	Approval
Placer County Air Pollution Control District	Authority to Construct Air Quality Permits
State of California Department of Health Services, Office of Drinking Water	Permits for community water systems
Placer County Environmental Health Services	Permits for individual onsite wells and septic systems
Foresthill Public Utility District	Provision of community water service
Central Valley Regional Water Quality Control Board	Construction Activities Storm Water General Permits NPDES Permits Waste Discharge Requirements Clean Water Act Section 401 permitting
California Department of Fish and Game	Approval of biological mitigation measures California Endangered Species Act consultation Streambed Alteration Agreements
Placer County Transportation Planning Agency, Placer County Department of Public Works, Placer County Department of Engineering and Surveying, Caltrans, U.S. Forest Service, American River Ranger District, Tahoe National Forest	Roadway improvements, encroachment permits, grading and drainage improvements
Placer County	Community Plan approval and subsequent rezoning; tentative maps, parcel maps, conditional use permits
Placer County Local Agency Formation Commission	Formation of and/or annexations to special districts, assessment districts, county service areas, etc. to provide additional municipal services
U.S. Fish and Wildlife Service	Federal Endangered Species Act consultation
U.S. Army Corps of Engineers	Clean Water Act Section 404 permitting

Agency	Approval
Placer County Flood Control and Water Conservation District	Consultation regarding drainage and flood control
Foresthill Fire Protection District	Roadway design for egress and access of evacuees and/or emergency equipment
Foresthill Fire Protection District	Approval of required fuel break design with associated funding mechanism for on-going maintenance for sub-divisions in excess of minor land divisions
Foresthill Fire Protection District	Fire hydrant lay-out and spacing requirements prior to final map approvals

Source: Quad Knopf, 2007

Response 9-P: The last paragraph found at page 3-68 of the DEIR is amended as follows to reflect the correct number of square miles within the Foresthill Fire Protection District:

> The Plan area is located in the Foresthill Fire Protection District and the Placer County Fire District. Fire protection within the town site is provided by paid and volunteer firefighters of the Foresthill Fire Protection District. The District comprises ~~72~~ 81 square miles, of which about 30 percent is in the National Forest. The District has three fire stations; one is staffed by paid firefighters, one is staffed by volunteers, and one functions as an equipment storage building.

Response 9-Q: The second paragraph found at page 3-69 of the DEIR is amended as follows to reflect the current planning effort being completed by the Foresthill Fire Protection District:

> The Foresthill Fire District ~~is currently working on a five-year plan~~ has recently completed a twenty-year plan for consideration by the Board of Supervisors. ~~Although the plan is not completed,~~ Under the proposed plan there are two predictable generalizations: 1) full buildout will require additional fire stations and facilities, and 2) full-time firefighter coverage will be necessary for full buildout. Currently, a 48-cent per square foot development fee is assessed upon new development to support fire protection services.

Response 9-R: In order to provide updated information regarding provision of ambulance service within the FDCP area the second paragraph at page 3-71 of the DEIR is amended as follows:

> Health Services
>
> Limited health and medical services are available in Foresthill. Medical attention is available through Foresthill Medical Center; dentistry and chiropractic services are also available in the Plan area. Emergency care and birthing services are provided through larger hospitals such as Auburn Faith Hospital in north Auburn and Sutter Roseville Hospital located in east Roseville. ~~Ambulance service in the Plan area is provided by AMR ambulance service out of Auburn (under contract with Placer County) and the Safety Club, a volunteer organization that provides emergency medical response to the community.~~ Ambulance service to the plan

area is provided by the Foresthill fire Protection District under contract with Sierra Sacramento Valley EMS Authority. The Foresthill Fire Protection District currently holds an exclusive operating contract for advanced life support services including transportation services for a geographical area of approximately 500 square miles. The entire FDCP area falls within this scope. Med-evac helicopters (Cal Star, under contract with Placer County) can land, as necessary, at the schools, ball fields, and on Foresthill Road.

Response 9-S: The Foresthill Fire Protection District indicates they have adopted the 2007 California Fire Code based on the 2006 International Fire Code in lieu of the Uniform Fire Code referenced in Policy 4.I.9 found at page 3-75 of the DEIR. Policy 4.I.9 is taken from the Countywide General Plan and amendment of such, as requested, would require amendment to the Countywide General Plan at some future date. Because amendment of the Countywide General Plan policy language is beyond the scope of the FDCP project, and because the requested modification is clarifying in nature and does not raise a significant environmental issue, the request is noted, but not incorporated as an amendment to the DEIR.

Response 9-T: The Foresthill Fire Protection District is requesting that Policy 8.C.2 found at page 3-77 of the DEIR be amended by adding a word "fuel" between the words fire and breaks and replacing a word "or" with the word "and" after the word breaks on the second line of the policy statement. Policy 8.C.2 is taken from the Countywide General Plan and amendment of such, as requested, would require amendment to the Countywide General Plan at some future date. Because amendment of the Countywide General Plan policy language is beyond the scope of the FDCP project, and because the requested modification is clarifying in nature and does not raise a significant environmental issue, the request is noted, but not incorporated as an amendment to the DEIR.

Response 9-U: Policy 3.D.13-2 of the FDCP found at page 3-82 of the DEIR is amended as follows to reflect a more realistic response time objective and provide consistency with Policy 4.I.2 of the Countywide General Plan found at page 3-75 of the DEIR:

3.D.13-2 The County shall encourage the Foresthill Fire Protection District to maintain the following standard~~s~~ (expressed as average response time~~s~~ to emergency calls):

a. Property: the arrival of the first fire apparatus at the point of need within ~~3 minutes "run time" 70% of the time and within 6 minutes 100% of the time~~ 10 minutes "run time" in rural areas

Response 9-V: Policy 3.D.13-9 of the FDCP found at page 3-83 of the DEIR is amended as follows to reflect that the Foresthill Fire Protection District and Placer County have adopted the 2007 California Fire Code based on the 2006 International Fire Code in lieu of the Uniform Fire Code:

3.D.13-9 The County shall ensure that all proposed developments are reviewed for compliance with fire safety standards by responsible local fire agencies per the ~~*Uniform Fire Code*~~ *California Fire Code* and other County and local ordinances.

Response 9-W: Policy 3.D.13-12 of the FDCP found at page 3-83 of the DEIR is amended as follows for clarification as requested by the Foresthill Fire Protection District

> 3.D.13-12 The County shall require that discretionary permits for new development in fire hazard areas be conditioned to include requirements for a fire safe community, defensible space fire-resistant vegetation, cleared fire breaks and fuel breaks, and ~~or~~ a long-term comprehensive fuel management program. Fire hazard reduction measures shall be incorporated into the design of development projects in fire hazard areas of Foresthill.

Response 9-X: The Foresthill Fire Protection District indicates they have adopted the 2007 California Fire Code based on the 2006 International Fire Code in lieu of the Uniform Fire Code referenced in Policy 4.I.9 found at page 3-157 of the DEIR. Policy 4.I.9 is taken from the Countywide General Plan and amendment of such, as requested, would require amendment to the Countywide General Plan at some future date. Because amendment of the Countywide General Plan policy language is beyond the scope of the FDCP project, and because the requested modification is clarifying in nature and does not raise a significant environmental issue, the request is noted, but not incorporated as an amendment to the DEIR.

Response 9-Y: The Foresthill Fire Protection District indicates they have adopted the 2007 California Fire Code based on the 2006 International Fire Code in lieu of the Uniform Fire Code referenced in Goal 1 under Safety found at page 3-162 of the DEIR. Goal 1 is taken from the current Foresthill General Plan and amendment of such, as requested, would require amendment to the Foresthill General Plan. Because ultimate adoption of the FDCP will replace the Foresthill General Plan, making amendment to the Foresthill General Plan to address this clarification is moot and because the requested modification is clarifying in nature and does not raise a significant environmental issue, the request is noted, but not incorporated as an amendment to the DEIR.

Letter 10

FORESTHILL PUBLIC UTILITY DISTRICT

www.foresthillpud.com

BOARD OF DIRECTORS
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Duane L. Frink
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Brett C. Grant
George S. Shaw

Kurt W. Reed, General Manager
Paul Chamberlain, District Counsel

received
3-4-08
JEC

March 3, 2008

Mr. Loren Clark, Assistant Director
Natural Resources and Special Projects
Placer County Planning Department
3091 County Center Drive, Suite 280
Auburn, California 95603

Subject: Draft Environmental Impact Report
Foresthill Divide Community Plan
(PEIR T20050537, State Clearing House # 2006022100)

Dear Mr. Clark:

The following written comments by the Foresthill Public Utility District are in support of verbal testimony given by the District at the Planning Commission Hearing held February 28, 2008 on the above referenced Community Plan EIR.

Said comments are in response to current provisions of the EIR regarding water supply which are either based on factually inaccurate or outdated information in light of the updated information contained in the District's January 2008 Water System Master Plan. A

Due to the significance of available water supply for the plan area and based on the inaccurate information in the Draft EIR, the District's position is that the EIR should be revised to include correct, updated information and be re-circulated for public comment. B

Comments:

I. Page 3-67 Water Supply, Fourth Paragraph:
Remove last sentence: "The surplus water supply for the District would only serve approximately 571 additional units outside existing District boundaries." As per District's 2008 Water System Master Plan, no such surplus exists for "outside existing District boundaries". Master Plan states existing Sugar Pine Reservoir safe yield at 2,150 acre feet per year, existing service area build out demand (1981 Foresthill Community Plan) at 3,069 acre feet per year resulting in existing service area deficiency at build out of 919 acre feet. Any such surplus is discussed on Page 3-92 Reconfigured Sugar Pine Dam. C

P.O. Box 266 24540 Main Street Foresthill, California 95631-0266 (530) 367-2511 Fax (530) 367-4385

II. Page 3-80 Policies –

3.D.5-1 Remove: "U.S. Bureau of Reclamation". U.S. Bureau of Reclamation transferred title to Sugar Pine Dam, Reservoir and conveyance facilities to District November 2003.

3.D.5-2 Remove: "PCWA" PCWA does not hold title to nor operate water treatment facilities within the Plan Area. D

3.D.5-3 Remove: "The Foresthill Public Utility District shall continue to pursue the purchase of Sugar Pine Dam and Reservoir from the U.S. Bureau of Reclamation." The District acquired title to the Project in November 2003.

III. Page 3-92 Discussion/Conclusion with incorporation of the Forest Ranch Concept Plan;

Entire section needs re-write. Foresthill Public Utility District has recently updated its 1992 Water System Master Plan by the completion of the January 2008 Foresthill Public Utility District Water System Master Plan. An updated SB610 Water Supply Assessment for the Forest Ranch Project based on the January 2008 Master Plan is anticipated in the near future.

The existing reliable yield of the District's Water Supply is 2,150 acre feet per year based on multiple drought years. Approximately 1,079 acre feet of water per year is needed to satisfy existing development within District boundaries and is well below the estimated reservoir yield during the critical design (drought) period. However, under the build-out condition, (1981 Community Plan) approximately 3,069 acre feet per year is needed to meet projected demands within existing District boundaries. Under the current reservoir configuration (7,000 acre feet maximum capacity) the District would require a 30% reduction in system demands at build out (919 acre feet) during the critical dry period within its present day boundaries.

The 2008 Master Plan performed additional evaluations of water supply benefits of an enlarged Sugar Pine Dam. The addition of 20 feet of surface elevation to Sugar Pine Reservoir would result in an increase of 3,658 acre feet for a total storage volume of 10,658 acre feet. Available yield during the critical design event period would be approximately 3,450 acre feet. E

This figure, 3,450 acre feet, does not include any increased release condition such as fishery flows, recreational storage pool increases or downstream water right requests. The approximate 3,450 acre feet of water minus the existing District boundary build out demand of 3,069 acre feet would result in an approximate 381 acre feet of water supply available to District Sphere-of-Influence areas (not within District boundaries).

The District has previously stated that is has available water supply to serve that portion of the Forest Ranch Project that is presently within existing District boundaries, +/- 530 EDU's (Equivalent Dwelling Units).

As stated the approximate 381 acre feet of surplus water supply could serve approximately 1,032 multi-family EDU's at 330 gallons per day per multi-family unit or 756 single family EDU's at 450 gallons per day per single family unit at build out with the enhanced re-configuration of Sugar Pine Reservoir. Development of the Forest Ranch Project not currently accounted for in the water demand/supply figures for existing District boundaries would require the development of water supplies beyond the scope of the District's 2008 Water System Master Plan.

IV. Page 3-148 Water Supply – Last Paragraph
Rewrite: "Foresthill Public Utility District supplies on average up to 1,200 acre feet of water from Sugar Pine Reservoir and can supplement supply in emergency situations with water from two (2) domestic wells in Todd's Valley.
Water from Mill Creek Springs is also available in normal to high precipitation years but is not reliable in dry conditions therefore is not utilized in long term supply calculations. Sugar Pine Reservoir was designed for expansion of twenty (20) feet of additional elevation. Potentially, said expansion could provide 3,658 acre feet of additional storage capacity (10,658 acre feet total). Reliable yield based on expanded reservoir hydrology would be approximately3,450 acre feet of total water supply. It is important to note that expansion of existing Sugar Pine Dam would not be without significant cost, environmental impact, submerge existing recreational facilities around the reservoir and may jeopardize existing District transfer law and held water rights." F

V. Page 3-197 Impact 3.6-8 Discussion/Conclusion 2nd paragraph: G
Please note the previous comment and insert in this section.

VI. Page 3-198 Impact 3.6-8 Discussion/Conclusion Last paragraph:
"What additional surface and groundwater supplies will be utilized?"
What available water resources are adequate to serve build-out of 22,010 population?
Suggest inclusion of: The District's available, reliable water supply with the re-configuration of Sugar Pine Dam would be approximately 3,450 acre feet. At build out, figures of 450 gallons per day per single family residential water demand equates to .504 acre feet per household per year. 3,450 acre feet ÷ .504 acre feet per household = 6,845 households, 6,845 households x 2.5 average persons per household as stated on Page 3-4 of the existing EIR results in a population of 17,113. H

VII. Chapter 6.0 Mitigation and Reporting Program:
Revise mitigation on Forest Ranch Project as per content of these comments. I

Sincerely,

Kurt W. Reed
General Manager

FORESTHILL PUBLIC UTILITY DISTRICT

www.foresthillpud.com

BOARD OF DIRECTORS
George S. Shaw
Gregory L. Wells
Duane L. Frink
William L. Sadler, Jr.
Brett C. Grant

Kurt W. Reed, General Manager
Paul Chamberlain, District Counsel

February 13, 2008

FEB 15 2008
PLANNING DEPT.

Placer County Community Development Resource Agency
Planning Department
Foresthill Divide Community Plan Team
Attention: Mr. Loren Clark, Assistant Director
3091 County Center Drive
Auburn, CA 95603

Subject: Comments on Draft Foresthill Divide Community Plan; Draft Environmental Impact Report, Revised Foresthill Divide Community Plan; Draft Environmental Impact Report-Appendices- Revised Foresthill Divide Community Plan

Dear Mr. Clark,

At the last regular meeting of the District's Board of Directors held January 9, 2008, the Board, by unanimous vote, approved the January 2008 Foresthill Public Utility District Water System Master Plan. Ms. Crystal Jacobsen of your staff was informed of this action via e-mail on January 25, 2008. Ms. Jacobsen was also provided an electronic copy of said plan and was urged to incorporate any/all references on water supply, yields, system demands, etc., into the Draft Foresthill Divide Community Plan document and to treat same as this District's " Comments " to said Community Plan. The Districts 2008 Water System Master Plan is also available on line at www.foresthillpud.com or if requested, a CD version will be mailed via the US Postal Service.

If you have any questions or require more detailed information please contact General Manager Kurt W. Reed at 530-367-2511 kreed@foresthillpud.com or District Consulting Engineer Gerry LaBudde, ECO: Logic Engineers at 916-773-8100 labudde@ecologic-eng.com

Sincerely,

Gregory L. Wells
President, Board of Directors

From: Crystal Jacobsen
To: Maywan Krach;
cc: Loren Clark; Ron Mauck;
Subject: FW: Foresthill Public Utility District comments-january 25,2008- Foresthill Community Plan (Revised)
Date: Monday, January 28, 2008 7:56:02 AM

FYI – see FHCP comments attached.

****
Crystal Jacobsen
Supervising Planner
Placer County Planning Department
3091 County Center Drive, Suite 140
Auburn, CA 95603
530.745.3085 (Direct)
530.745.3000 (Main)
530.745.3080 (Fax)
cjacobse@placer.ca.gov
****

From: Kurt Reed [mailto:kreed@foresthillpud.com]
Sent: Friday, January 25, 2008 3:55 PM
To: Crystal Jacobsen
Subject: Foresthill Public Utility District comments-january 25,2008- Foresthill Community Plan (Revised)

Ms. Jacobsen and other members of the County Planning staff associated with the Revise of the 1981 Foresthill Community Plan:

Please note the District's recently adopted Master Plan, January 2008 (on-line at www.foresthillpud.com). Section 3). Land Use and Water Demand; and Section 4). Water Supply Yield Study, should be referenced throughout the revised plan when discussing water demands and water availability/reliability within the Districts

existing boundry.

I would appreciate your prompt attention in this matter.

Sincerely,
Kurt W. Reed, General Manager
Foresthill Public Utility District

Letter 10 Kurt W. Reed, General Manager, Foresthill Public Utility District

Response 10-A: The information contained in the Revised DEIR was obtained directly from the Foresthill Public Utility District and was considered accurate at the time the EIR was prepared. The DEIR had already been released for circulation when the District's updated Water System Master Plan was adopted in January.

Response 10-B: The CEQA Guidelines (Section 15088.5) require recirculation when the following circumstances are encountered:

> (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the DEIR for public review under Section 15087, but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
>
> (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
> (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
> (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
> (4) The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In this case, the information presented in the revised Water Supply Master Plan does not constitute significant new information that deprived the public of a meaningful opportunity to comment. The district has re-evaluated their water supply and has determined that the available water supply is slightly less than the supply identified in the SB 610 analysis that the District prepared for the Forest Ranch project completed in February 2004. The District has also changed their assumptions regarding future water demand. This does not constitute significant new information since the data is similar and the conclusions are the same. It is interesting to note that the current water demand has been revised downward. The SB 610 Compliance Study estimated a service population of 5,800 and an existing demand of 1,154 acre-feet per year. The revised Master Plan states that the District serves a population of 5,200 and a current water demand of 1,079 acre-feet. It is unclear why the existing water demand would be less in 2007

than it was in 2004. It is assumed that the District has improved the accuracy of how they calculate existing demand. On a per capita basis, this is an almost identical amount of water use. The District has also increased the projected water use; however, this is also fairly similar to the data presented in the Revised DEIR. For example, the water use demand factor has increased from the 430 gpd/EDU used in the SB 610 analysis to 450 gpd/EDU. When unaccounted water is factored in, that figure rises to 485 gpd/EDU.

The Revised Master Plan also changes the estimated yield of the reservoir. Two different methodologies were utilized resulting in different yield factors. Using the reliability standard the estimated yield for the current reservoir was 2,750 acre-feet which is somewhat higher than the 2,707 acre-feet used in the Forest Ranch SB 610 analysis that was incorporated into the Revised DEIR. The District considers the "Operations simulation" to be a more accurate analysis since it is based on the critical period, the years 1975 through 1978. This method resulted in a yield of 2,150 acre-feet. In all cases, there is sufficient supply to serve the existing population in the District, but insufficient supply to serve buildout within the District boundaries. This is consistent with the conclusion that was reached in the Revised DEIR.

In addition, the Revised DEIR discusses the possibility of raising the level of the dam, but does not recommend it as an implementing measure. Raising the level of the dam is discussed on page 3-93 of the Revised DEIR.

Although the District has changed some assumptions since they prepared the SB 610 analysis, there is no significant change in the water supply or demand figures and no change in the conclusion; therefore, the public was given a meaningful opportunity to comment and re-circulation is not required.

Response 10-C: The Revised Water Supply Master Plan states that the District does not have enough supply to serve the existing District boundaries and there is a deficiency of 919 acre-feet per year. In the Implementation Plan, the District states that a Drought Contingency Plan could possibly be adopted which would result in a 30% reduction in demand, resulting in a savings of 920 acre-feet. This is a reasonable approach to make up the stated shortfall for buildout in District boundaries.

The fourth paragraph on page 3-67 in the DEIR is hereby revised to state:

> The above referenced demand estimate does not take into account the other proposed uses such as the golf course. No other water sources have been identified~~. The surplus water supply for the District would only serve approximately 571 additional units outside existing District boundaries.~~ The Water System Master Plan (January 2008) states that the existing Sugar Pine Reservoir safe yield at 2,150 acre-feet per year. The existing service area build out demand is 3,069 acre-feet per year resulting in an existing service area deficiency at build out of 919 acre-feet.

Response 10-D: This is a comment on the Draft Foresthill Divide Community Plan Policies and is not a comment on the DEIR. These comments will be taken into consideration by Placer

County staff. Since the Community Plan is still in a draft stage, it is possible to make these corrections.

Response 10-E: The information in this section of the EIR came directly from the Foresthill Public Utility District. After the Revised DEIR was circulated for public comment, the District updated the Water System Master Plan and revised some of their assumptions in calculating the total water supply. The following information will be added to the third paragraph on page 3-93 of the Revised DEIR:

> Development of the Forest Ranch Concept Plan residential units not currently accounted for in the water demand figures for the existing district boundaries (1,689 units) would require approximately 845 acre feet of water per year. That demand estimate does not take into account the other proposed uses such as the golf course. The surplus water supply for the District would only serve approximately 571 additional units outside existing District boundaries. Although the District does not currently have any plans to expand water capacity, there are some options that could be explored. As noted in the SB 610 analysis, the District holds water rights to additional water; however, storage facilities are inadequate. It is possible to raise the level of Sugar Pine Dam which would provide the capacity to serve the Forest Ranch Concept Plan site. Additionally, it may be possible to drill new wells to serve the project. For the purpose of this program EIR, it is not necessary to definitely determine the water supply for the Forest Ranch Concept Plan. It is clear that current water supply and treatment facilities are inadequate to serve the project; however, there are potential sources of water that could be developed in the future. The January 2008 Water System Master Plan prepared by the Foresthill Public Utility District contains updated information on water supply and demand. This is a ***potentially significant impact.***

This information is included as Appendix A of this Final EIR. As discussed in Response 10-B above, this updated information does not constitute new information that would alter any of the conclusions or mitigation in this EIR.

Response 10-F: The last paragraph on page 3-148 in the DEIR is revised to state:

> Foresthill PUD supplies on average up to 1,200 acre-feet of water from the Sugar Pine Reservoir, and can supplement the supply in emergency situations with water from two (2) domestic wells in Todd's Valley ~~only~~. Water from Mill Springs is also available in normal to high precipitation years but is not ~~counted in~~ reliable in dry conditions; therefore, it is not utilized in long-term supply calculations. Sugar Pine Reservoir was designed for expansion of twenty (20) feet of additional elevation. Potentially, this expansion could provide 3,658 acre-feet of additional storage capacity (10,658 acre-feet total). Reliable yield based on expanded reservoir hydrology would be approximately 3,450 acre-feet of total water supply. ~~The BLM originally designed the reservoir for eventual capacity expansion; the dam could potentially be raised an additional 4 to 5 feet to~~

~~accommodate an additional 4,000 to 5,000 acre-feet; however, i~~ It is important to note that the expansion of facilities would not be without significant environmental impact, and would submerge existing recreational facilities around the reservoir.

Response 10-G: The second paragraph in the discussion of Impact 3.6-8 on page 3-197 of the DEIR will be revised as follows:

> Foresthill PUD supplies on average up to 1,200 acre-feet of water from the Sugar Pine Reservoir, and can supplement the supply in emergency situations with water from two (2) domestic wells in Todd's Valley ~~only~~. Water from Mill Springs is also available in normal to high precipitation years but is not ~~counted in~~ reliable in dry conditions; therefore, it is not utilized in long-term supply calculations. Sugar Pine Reservoir was designed for expansion of twenty (20) feet of additional elevation. Potentially, this expansion could provide 3,658 acre-feet of additional storage capacity (10,658 acre-feet total). Reliable yield based on expanded reservoir hydrology would be approximately 3,450 acre-feet of total water supply. Water supply and transmission facilities would need to be expanded to serve the build out population of 22,010. ~~The BLM originally designed the reservoir for eventual capacity expansion; the dam could potentially be raised an additional 4 to 5 feet to accommodate an additional 4,000 to 5,000 acre-feet; however, i~~ It is important to note that the expansion of facilities would not be without significant environmental impact, and would submerge existing recreational facilities around the reservoir.

Response 10-H: The Foresthill Divide Community Plan area encompasses an area much larger than what is served by the Foresthill Public Utility District. These areas rely on groundwater supplies. With regard to the additional surface water supplies, the District has water rights to additional surface water and the limiting factor at the present time is the absence of adequate storage facilities. Additional surface water can be made available by expanding storage facilities. A combination of groundwater and surface water will serve the build out under the community plan. During the time horizon of this plan, it is anticipated that a population of 9,620 will reside in the plan area.

As noted previously, the Foresthill Public Utility District serves only a portion of the planning area. The forecast for the entire planning area at 2030, including those areas served by individual wells, is 9,620 persons. The 22,010 population figure is the buildout under the proposed zoning which will not occur during the planning horizon that is evaluated in this document.

Response 10-I: The content of these comments did not result in new or revised mitigation. No changes to the Mitigation Monitoring Program are required.

CALIFORNIA TRAIL USERS COALITION

FRIENDS OF FORESTHILL OHV TRAILS

March 5, 2008

RE: FORESTHILL DIVIDE COMMUNITY PLAN - PEIR - T20070206

CRYSTAL JACOBSEN
Placer County

Dear Crystal:

Thank you for notifying us of the preparation of an DEIR for the Foresthill Community Development Plan. Below are several concerns about this DEIR that I respectfully ask be included in the final environmental reports

1. Will the proposed developments be signed by newly created sign ordnance for developers, as requested by the County Supervisors. A
2. How will the projects affect recreational traffic on Sugarpine Road (especially the Foresthill Rd intersection) and towards Iowa Hill Rd? Are there plans to address Sugarpine road as a County Road? Also review Finning Mill road. B
3. Will protection measures will be taken to address out of area (Recreation) traffic along Foresthill Rd. continuing along the private residential portion just north of downtown. Existing Traffic counts should be generated during the summer months during peak use periods and include in any computation regarding the proposed use of these properties. C
4. What measures will be taken to prevent light pollution for campers at adjacent campgrounds to the east of these proposed developments? It does not appear to have been addressed in the DEIR. D
5. Will the removal of this wildlife habitat be mitigated somewhere else in the area? E
6. Will the final documents identify the current trail system adjacent to the proposed development that are used for OHV or Off Highway vehicles. This use is currently out of ear shot of many homes, and with this proposed development adjacent to this park may create a potential use conflict. Please address this in the final documents. F
7. Indentify the impacts to recreation Equestrian, Hiking, Camping, and **Off highway vehicles** Etc. Will the project continue to provide access for recreations of this nature, or expand this use. OHV use is the primary use on the adjacent USDA Federal property not equestrian; please revise the DEIR to reflect this. G

8. Will the proposed actions impact existing uses in and along the USDA Forest service property? H

9. What measures during construction and post construction will be taken to prevent noise impacts on the nearby recreation use? I

10. What measures will be taken to address the natural look of ridgelines in this area for the protection of existing views for recreational users. J

11. Will the community plan address the jobs lost due to closing recreation areas during winter months? K

12. Will the community plan address additional Jobs due to increases in recreation in the US forest service American River Ranger district? L

Please include me in further updates on this project and place my name on the list to receive the Final EIR. I appreciate your attention to my concerns. FOFOT stands for furthere development in the Foresthill community to provide for long term stability and viability to the local economy.

Respectfully,

John D Gillmore
Director CTUC – FOFOT
A 501 (C) 3

10271 Hillview Rd,

Newcastle, CA 95658.

Letter 11: John D Gillmore, Director, Friends of Foresthill OHV Trails, A Division of California Trails Users Coalition

Response 11-A: Future development projects located within the FDCP area will provide on site signage in accordance with any Placer County ordinances in effect at the time of development.

Response 11-B: It is not anticipated that Off-Highway Vehicle (OHV) recreational traffic will be affected by the FDCP in that lands north and east of Finning Mill Road (roughly the westerly boundary of roads and trails included in the Sugar Pine off-Highway Vehicle Trails System) are designated for 80 acre minimum timberland and Open Space uses which are supportive of, and compatible with, the OHV Trail System. The FDCP does not propose to change the jurisdictional status of roads within the Sugar Pine off-Highway Vehicle Trails System.

Response 11-C: The traffic impact study prepared for the DEIR accounts for total traffic volume projected on public roadways within the FDCP, including recreational traffic. See Response 11-B regarding affects of the FDCP on recreational use of the roadway system. The analysis was based on traffic volume and vehicle classification data collected on Tuesday, May 17, 2005. At the study intersections, AM and PM peak-period (i.e., 7:00 – 9:00 AM and 4:00 – 6:00 PM) turning movement counts were conducted at the I-80 interchange on August 20, 2004. The traffic counts were performed on a summer Friday, in order to capture typical weekend recreational traffic at the I-80/Auburn Ravine Road/Foresthill Road interchange. As such, the counts represent higher-than-average traffic volumes, thereby providing a conservative indication of traffic operations at the study intersections. That data ensured that not only were the most current traffic volumes considered, but also that the analysis incorporated current, accurate information regarding the composition of the traffic on Foresthill Road, particularly with respect to the volume of trucks and other heavy vehicles on the road.

Response 11-D: Campgrounds located within the FDCP area are typically sufficient distance from existing, or proposed residential use areas that could develop in accordance with the FDCP to prevent light pollution. As stated at page 3-62 of the DEIR, the proposed FDCP includes Policies 3.C.3-6, 3.C.5-1, and 3.C.2-3 related to lighting and Implementation Measure #28 for Natural Resources/Conservation/Open Space of the FDCP calls for adoption of a “dark sky” ordinance to protect important nighttime visual resources in the Plan area. Lighting reduction measures are also addressed in the proposed Foresthill Community Design Guidelines.

Response 11-E: Mitigation of impacts resulting from conversion of wildlife habitat that could occur over time with implementation of the FDCP have been addressed by Mitigation Measures related to Impacts 3.6-9 through 3.6-19 of the DEIR found at pages 3-199 through 3-209 of the DEIR.

Response 11-F: The closest segment of the OHV trail system located within the FDCP area is approximately 1.5 miles to the east of lands planned for residential development by the FDCP. At this distance, it is not anticipated that conflict between future residential development and OHV activity will occur.

Response 11-G: It is not anticipated that Off-Highway Vehicle (OHV) recreational opportunities will be affected by the FDCP in that lands north and east of Finning Mill Road (roughly the westerly boundary of roads and trails included in the Sugar Pine off-Highway Vehicle Trails System) are designated for 80 acre minimum timberland and Open Space uses which are supportive of, and compatible with, the OHV Trail System.

Response 11-H: See Response 11-G.

Response 11-I: Potential noise impacts to properties located near sites that could be developed under the land use designations proposed by the FDCP, including nearby recreational use properties, are addressed and mitigated through mitigation measures 3.10-1a through 3.10-1h, mitigation measures 3.10-2a through 3.10-2c and mitigation measure 3.10-4 found at pages 3-320 through 3-331 of the DEIR.

Response 11-J: As stated at page 3-58 of the DEIR, Goal 3.C.9 and Policies 3.C.9-1 through 3.C.9-3, 3.C.9-6, 3.B.3-3, and 3.B.3-7 address the protection of visual and scenic resources within the FDCP area including the avoidance of locating structures along ridgelines and steep slopes such that they would be silhouetted from below or from a public road.

Response 11-K: The proposed FDCP contains policies directed toward economic development and job creation to the extent appropriate for the FDCP area. Adherence to these policies should assist in offsetting reduction in recreational employment during winter months.

Response 11-L: See Response 11-K.