

UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT

SCH# 2017102081

FINAL ENVIRONMENTAL IMPACT REPORT

PREPARED FOR
PLACER COUNTY



JANUARY 2019

PREPARED BY



1501 SPORTS DRIVE, SUITE A, SACRAMENTO, CA 95834

**United Auburn Indian Community School Project
Final Environmental Impact Report**

SCH# 2017102081

Prepared for
Placer County

Shirlee Herrington
Environmental Coordination Services
(530) 745-3132

Prepared by
Raney Planning & Management, Inc.

Nick Pappani, Vice President
1501 Sports Drive, Suite A
Sacramento, CA 95834
(916) 372-6100

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1. INTRODUCTION AND LIST OF COMMENTERS

1

INTRODUCTION AND LIST OF COMMENTERS

1.1 INTRODUCTION

This Final Environmental Impact Report (EIR) contains agency and resident comments received during the public review period of the United Auburn Indian Community School Project (proposed project) Draft EIR. This document has been prepared by Placer County, as Lead Agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, Section 15132. The Introduction and List of Commenters chapter of the Final EIR discusses the background of the Draft EIR and purpose of the Final EIR, identifies the comment letters received on the Draft EIR, and provides an overview of the Final EIR's organization.

1.2 BACKGROUND

The Draft EIR identified the proposed project's potential impacts and the mitigation measures that would be required to be implemented. The following environmental analysis chapters are contained in the proposed project Draft EIR:

- Air Quality;
- Biological Resources;
- Cultural Resources;
- Hazards and Hazardous Materials;
- Noise;
- Transportation and Circulation;
- Utilities and Service Systems;
- Cumulative Impacts and other CEQA Sections; and
- Alternatives.

In accordance with CEQA, a Notice of Completion (NOC) of the Draft EIR was published on the Placer County Community Development Resource Agency website, and the Draft EIR was sent to the State Clearinghouse (SCH#: 2017102081) for distribution to State agencies on August 17, 2018 for a 45-day public review period, ending on October 1, 2018. The Draft EIR was also posted on the Placer County website, and printed copies of the document were made available for review at: 1) the Loomis Library and Community Center, located at 6050 Library Drive, Loomis, CA, 2) the Placer County Community Development Resource Agency offices in Auburn, located at 3091 County Center Drive, Auburn, CA, and 3) the County Clerk's Office, located at 2954 Richardson Drive, Auburn, CA. In addition, a public hearing was held on September 27, 2018 to solicit public comments regarding the Draft EIR.

1.3 PURPOSE OF THE FINAL EIR

Under CEQA Guidelines, Section 15132, the Final EIR shall consist of:

1. The Draft EIR or a revision of the Draft.
2. Comments and recommendations received on the Draft EIR.
3. A list of persons, organizations, and public agencies commenting on the Draft EIR.
4. The responses to significant environmental points raised in the review process.
5. Any other information added by the Lead Agency.

As required by CEQA Guidelines, Section 15090(a)(1)-(3), a Lead Agency must make the following three determinations in certifying a Final EIR:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency’s independent judgment and analysis.

Under CEQA Guidelines, Section 15091, a public agency shall not approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects. Findings of Fact must be accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The Findings of Fact are included in a separate document that will be considered for adoption by the County’s decision-makers.

In addition, pursuant to CEQA Guidelines, Section 15093(b), when a Lead Agency approves a project that would result in significant and unavoidable impacts, the agency must state in writing the reasons supporting the action (Statement of Overriding Considerations). The Statement of Overriding Considerations shall be supported by substantial evidence. Here, the proposed project would result in project-level and cumulative transportation and circulation impacts that would be significant and unavoidable; thus, a Statement of Overriding Considerations must be adopted if the project is approved. The Statement of Overriding Considerations is included in a separate document that will be considered for adoption by the County’s decision-makers.

1.4 LIST OF COMMENTERS

Placer County received six comment letters during the public comment period on the Draft EIR for the proposed project. The comment letters were authored by the following agencies:

Agencies

- Letter 1 Plan Review Team, Pacific Gas and Electric Company
- Letter 2 Kevin Yount, California Department of Transportation

Letter 3..... Annalise Metzger, California Department of Fish and Wildlife
Letter 4..... Dean Wright, P.G., Department of Toxic Substances Control
Letter 5..... Stephanie Tadlock, Central Valley Regional Water Quality Control Board
Letter 6..... Carie Huff, South Placer Municipal Utility District

It should be noted that a public hearing was held on September 27, 2018, but verbal comments on the project were not received.

1.5 ORGANIZATION OF THE FINAL EIR

The Final EIR is organized into the following chapters:

1. Introduction and List of Commenters

Chapter 1 provides an introduction and overview of the document, describing the background and organization of the Final EIR. Chapter 1 also provides a list of commenters who submitted letters in response to the Draft EIR.

2. Responses to Comments

Chapter 2 presents the comment letters received and responses to each comment. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. The response to each comment will reference the comment number.

3. Revisions to the Draft EIR Text

Chapter 3 summarizes changes made to the Draft EIR text in response to comment letters.

4. Mitigation Monitoring and Reporting Program

CEQA Guidelines, Section 15097, requires lead agencies to adopt a program for monitoring the mitigation measures required to avoid the significant environmental impacts of a project. The intent of the Mitigation Monitoring and Reporting Program (MMRP) is to ensure implementation of the mitigation measures identified within the EIR for the United Auburn Indian Community School Project.

2. RESPONSES TO COMMENTS

2

RESPONSES TO COMMENTS

This chapter contains responses to each of the comment letters submitted regarding the United Auburn Indian Community School Project Draft EIR. Each bracketed comment letter is followed by numbered responses to each bracketed comment. The responses amplify or clarify information provided in the Draft EIR and/or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues (e.g., opinions on the merits of the project that are unrelated to its environmental impacts) are either discussed or noted for the record, as appropriate. Where revisions to the Draft EIR text are required in response to the comments, such revisions are noted in the response to the comment, and are also listed in Chapter 3 of this Final EIR. All new text is shown as double underlined and deleted text is shown as ~~struck through~~.

The changes to the analysis contained in the Draft EIR represent only minor clarifications/amplifications and do not constitute significant new information. In accordance with CEQA Guidelines, Section 15088.5, recirculation of the Draft EIR is not required.

Letter 1



Plan Review Team
Land Management

PGEPlanReview@pge.com
8111 Bollinger Canyon Road 3370A
San Ramon, CA 94583

August 31, 2018

Emily Setzer
Placer County
3091 County Center Dr., Ste 190
Auburn, CA 95603

Ref: Gas and Electric Transmission and Distribution

Dear Ms. Setzer,

1-1

Thank you for submitting PLN17-00018 plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review.

1-2

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.

1-3

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

1-4

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management



Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <http://usanorth811.org/wp-content/uploads/2017/05/CA-LAW-English.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.
4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches $[24/2 + 24 + 36/2 = 54]$ away, or be entirely dug by hand.)

1-5



1-5
Cont'd

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes,



**1-5
Cont'd**

service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.



Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "RESTRICTED USE AREA – NO BUILDING."
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.
8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for

1-6



1-6
Cont'd

proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

LETTER 1: PLAN REVIEW TEAM, PACIFIC GAS AND ELECTRIC

Response to Comment 1-1

The comment is an introductory statement and does not address the adequacy of the Draft EIR.

Response to Comment 1-2

The comment is informational and does not address the adequacy of the Draft EIR.

Response to Comment 1-3

The full scope of the proposed project can be found in Section 3.5 on page 3-6 within the Project Description chapter of the Draft EIR. The Project Description chapter includes all aspects of the proposed project. Gas and electricity facilities and services are addressed in Chapter 10, Utilities and Service Systems, of the Draft EIR. Regulatory context pertaining specifically to PG&E's facilities and services is discussed on page 10-8 in Chapter 10 of the Draft EIR.

Response to Comment 1-4

The project applicant will provide payment of all applicable fees and approvals required should PG&E determine necessary upon receipt of project plans.

Response to Comment 1-5

The comment is an informational attachment and does not address the adequacy of the Draft EIR.

Response to Comment 1-6

The comment is an informational attachment and does not address the adequacy of the Draft EIR.

Letter 2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 3
703 B STREET
MARYSVILLE, CA 95901
PHONE (530) 741-4233
FAX (530) 741-4245
TTY 711
www.dot.ca.gov/dist3



*Making Conservation
a California Way of Life.*

September 5, 2018

GTS# 03-PLA-2017-00301
03-PLA-080 PM 10.023

Shirlee Herrington
Placer County
3091 County Center Drive
Auburn, CA 95603

United Auburn Indian Community School

Dear Shirlee Herrington:

2-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental/application review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

The proposed project consists of demolition of existing on-site structures and construction of a UAIC Pre-K through 8th grade school, a Tribal Education Center, and a Tribal Cultural Center on the northern third of the project site. Access to the site would be provided via Taylor Road to the north of the site. The project would include associated infrastructure to support the proposed development. The project is located in Placer County to the east of the town of Loomis. The following comments are based on the Draft Environmental Impact Report (DEIR) received.

Traffic Operations

2-2

The traffic impact study for this project did not include the Horseshoe Bar Rd/I-80 and Penryn Rd/I-80 interchanges. Table 9-7 shows a significant number of proposed project trips using both interchanges. Current conditions on both AM and Peak periods experience recurring significant off-ramp queues at the Penryn Road/WB-80 intersection. The lack of roadway capacity on Penryn Road and WB-80 intersection impacts both local and freeway traffic operations. Commuters using the Penryn Road on ramp to WB-80 also encounters merging conflicts onto the freeway due to the short merge transition, which could be exacerbated by potential project trips.

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

**Letter 2
Cont'd**

Ms. Shirlee Herrington, Placer County
September 5, 2018
Page 2

2-3

Please update the project traffic study to include the following traffic analysis:

- A traffic analysis for Horseshoe Bar Road and Penryn Road interchanges for future/cumulative conditions on these facilities.

2-4

- The traffic analysis should include both merge/diverge for I-80 and length of queue for off/on ramps at both interchanges.

- Provide a Vehicle Miles Travelled (VMT) analysis to address potential mitigation for the lack of existing bike lanes, pedestrian walkways and public transit.

2-5

We recommend the project applicant add bike lane facilities and facilitate public transportation to mitigate VMT generated by the proposed project.

2-6

We recommend the project applicant contribute to all applicable traffic impact fee programs that contribute towards the improvement of the State Highway System.

2-7

Please provide our office with copies of any further actions regarding this project or future development of the property. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any question regarding these comments or require additional information, please contact David Smith, Intergovernmental Review Coordinator for Placer County, by phone (530) 634-7799 or via email to david.j.smith@dot.ca.gov.

Sincerely,



KEVIN YOUNT, Branch Chief
Office of Transportation Planning
Regional Planning Branch—East

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Response to Comment 2-1

The comment is introductory and does not address the adequacy of the Draft EIR.

Response to Comment 2-2

In order to respond to the comment with regard to potential impacts to Interstate 80 (I-80) interchanges at Penryn Road and Horseshoe Bar Road, the traffic consultant for the proposed project, KD Anderson & Associates, Inc., assembled available information, conducted new traffic counts, and evaluated Level of Service (LOS) impacts as applicable. The results of the additional study are summarized in a memo and included as an appendix to this Final EIR.

The operation of the I-80/Horseshoe Bar Road interchange ramp intersections in Loomis is described in the Draft EIR for the Costco project proposed on Sierra College Boulevard.¹ That document indicates that the signalized westbound (WB) ramps intersection operates at LOS B, while the stop-controlled eastbound (EB) ramps intersection operates at LOS F in the morning and evening peak hours. KD Anderson & Associates, Inc. notes that the Town of Loomis was evaluating its five-year Capital Improvement Program (CIP) at its October 9th Town Council Meeting, and a traffic signal at this location has been included in the Draft CIP.

The impacts of the proposed project were not evaluated at this location in the proposed project Draft EIR based on the small amount of traffic added by the proposed project. The Costco Draft EIR indicates that the Town considers the impact of a project to be insignificant at a deficient unsignalized intersection if its contribution to total peak hour traffic volume is less than five percent of the background volume. In this case, the proposed project's trips at the EB ramp intersection total 16 in the AM peak hour and 1 in the PM peak hour. This represents 1.2 percent of the existing traffic in the AM peak hour and less than one percent in the PM peak hour. As these increments are less than the five percent permitted under Town policy, the proposed project's impacts are not significant.

New AM and PM peak hour traffic counts were conducted at the two I-80/Penryn Road interchange ramp intersections on Tuesday October 9, 2018 and Wednesday October 10, 2018. This data is included in the appendix to this Final EIR and was used to evaluate the current operating LOS, which is noted in Table 1 below.

The current LOS at the signalized WB ramps intersection meets applicable minimum standards. The ramp queues were not observed to be appreciable during the time the counts were conducted.

¹ AECOM. *Loomis Costco Draft Environmental Impact Report*. June 2018.

**Table 1
 Existing Plus Project LOS at the Interstate 80/Penryn Road Interchange**

Intersection	Control	AM Peak Hour (7:15 to 8:30 AM)				PM Peak Hour (4:30 to 5:30 PM)			
		Existing		Existing Plus Project		Existing		Existing Plus Project	
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Penryn Road/WB I-80 ramps	Traffic Signal	25.0	C	27.5	C	21.5	C	21.5	C
Penryn Road/EB I-80 ramps	EB/SB Stop	(20.5)	(C)	(21.0)	(C)	(18.5)	(C)	(19.0)	(C)
• (overall)		7.9	A	7.9	A	7.8	A	7.9	A
• NB left turn		7.8	A	7.8	A	7.6	A	7.6	A
• SB left turn		25.8	C	26.5	D	20.7	C	21.6	C
• EB approach		13.7	B	13.8	B	13.8	B	14.0	B
• WB approach									
Note: The (overall) LOS is based on the weighted average delay for all movements that yield the right of way. Overall average delay is rounded to the nearest 0.5 second.									
Source: KD Anderson & Associates, Inc., October 19, 2018.									

The LOS at the EB ramp intersection is LOS C in the AM and PM peak hour, which satisfies the County's minimum LOS D standard. The volume of existing traffic satisfies peak hour traffic signal warrants based on the "rural" criteria that are appropriate for the speed limit on this segment of Penryn Road. As demonstrated in Table 1, the addition of project trips would not have a significant impact at the EB ramp location under regular weekday conditions. This location is addressed by Placer County's Newcastle/Horseshoe Bar/Penryn traffic impact fee Benefit District where a traffic signal is identified.

It is noted that traffic conditions along the I-80 corridor vary greatly due to mainline I-80 congestion and the choices made by motorists regarding alternative routes. For example, when EB I-80 is slowed due to collisions or weekend congestion in Auburn, many motorists abandon the highway and use alternative parallel routes. Congestion can become severe on Taylor Road and on the ramp connections to that County road. Similarly, on Sundays, WB I-80 traffic is slowed and motorists may leave the highway at the Penryn Road interchange to use Boyington Road to reach Taylor Road. With exception of the occasional special event, typical project traffic would occur during the weekdays.

In summary, the LOS at the WB ramps and EB ramps intersections would remain within the LOS D minimum standard with implementation of the proposed project. While peak hour signal warrants would continue to be satisfied, both LOS and signal warrant criteria need to be satisfied under Placer County methodology to determine a significant impact. Thus, the proposed project's impact is not significant, and no mitigation is required.

Response to Comment 2-3

The Costco Draft EIR traffic study introduced long-term cumulative conditions at the two I-80/Horseshoe Bar Road interchange ramp intersections in Loomis. While the WB ramps intersection was shown to deliver LOS that met applicable Town minimum standards, the EB ramps intersection was shown to operate at LOS F with no improvements. While the Costco Draft EIR traffic study did not discuss any improvements to this location, interchange improvements are included in the Town's traffic impact fee program and are being considered for the Town's short-term CIP.

Under Town of Loomis policy, the additional trips caused by the proposed project would not have a significant traffic impact to the interchange, as the project trips would be too little to cause the WB ramps intersection to reach an unacceptable LOS. In addition, the proposed project trips would represent less than five percent of the cumulative volume at the deficient EB ramp intersection.

Information is not readily available regarding long-term conditions at the I-80/Penryn Road interchange. However, as noted above, the interchange improvements are already included in the Newcastle/Horseshoe Bar/Penryn impact fee. While the significance of the proposed project's cumulative impacts at the I-80/Penryn Road intersection has not been calculated, because this location is addressed by the County's fee program, the proposed project would contribute its fair share to cumulatively needed improvements by paying adopted fees.

Response to Comment 2-4

Ramp merge-diverge LOS is not normally requested as a part of Placer County traffic impact analyses and comments related to such were not received during the public review period for the proposed project's Notice of Preparation. Ramp merge-diverge analysis is beyond the scope of the proposed project analysis and is not required to adequately assess the project's impacts. As noted earlier, interchange improvements are included in the Town of Loomis traffic impact fee program, and the Town is considering including the Horseshoe Bar Road/EB I-80 ramps intersection traffic signal in its short-term CIP.

As discussed above, the proposed project's contribution to peak hour traffic volumes at the I-80/Horseshoe Bar Road ramps intersections is less than the five percent increment permitted under Town of Loomis policy, and, as a result, the proposed project's impact is not significant.

The length of queues at the I-80/Penryn Road interchange were identified as a byproduct of LOS analysis and are noted in Table 2 below. As indicated, under current conditions, the length of peak period queues is well within the available storage provided by the off-ramps. Peak hour queues do not approach the freeway mainline with or without the project. Thus, the impacts of the proposed project on ramp queues are not significant at this location.

As noted above, the possibility exists that conditions on I-80 ramps are occasionally influenced by mainline congestion, which in turn causes motorists to leave the freeway and choose alternative routes. This could be the case on peak Fridays and Sundays when Taylor Road becomes an attractive alternative. The I-80/Penryn Road ramps could be affected at those times. The peak periods of traffic associated with the proposed project are anticipated to be the periods before and after the school day (i.e., 7:00 to 9:00 AM and 2:30 to 3:30 PM). Thus, the proposed project's peak hour traffic volumes would not coincide with the aforementioned peak periods on Fridays and Sundays.

**Table 2
 Existing Plus Project 95th Percentile Ramp Queues at the Interstate 80/Penryn Road Interchange**

Intersection	Storage (feet)	AM Peak Hour (7:15 to 8:30 AM)				PM Peak Hour (4:30 to 5:30 PM)			
		Existing		Existing Plus Project		Existing		Existing Plus Project	
		Volume (vph)	Queue (feet)	Volume (vph)	Queue (feet)	Volume (vph)	Queue (feet)	Volume (vph)	Queue (feet)
Penryn Road/WB I-80 ramps	785	160	145	186	165	177	130	188	135
Penryn Road/EB I-80 ramps									
• EB left turn + thru	750	166	108	166	110	245	113	245	118
• EB right turn ¹	25	96	<25	96	<25	186	<25	186	<25

¹ Observation noted a “defacto” right-turn lane created by shoulder and curb return. Without assumed right-turn lane, lane total queue is 173 (AM Existing), 255 (PM Existing), 178 (AM Existing Plus Project), and 270 (PM Existing Plus Project).

Source: KD Anderson & Associates, Inc., October 19, 2018.

Response to Comment 2-5

In response to the comment, the project’s contribution to regional Vehicle Miles Traveled (VMT) and the associated need for improvements to bicycle, pedestrian, and public transit facilities has been assessed. The Draft EIR included a discussion regarding the current pedestrian and bicycle facilities that are already available in the vicinity of the project site and notes that these facilities are consistent with the County’s long-range plan for Taylor Road. Sidewalks are not applicable in this rural location and the existing Class II bike lane along Taylor Road remains appropriate. The project proponents have elected to include private transit facilities in the project description, and nearly all students would be transported to and from the school by a fleet of vans. Van transport is already provided to the current school site and is a feasible option for the new school. As noted in the Draft EIR traffic analysis, this feature has the effect of reducing project trip generation, and regional VMT. Provision of van service would be included as a condition of approval for the proposed project. Any future decision to remove van service would require a modification to the project’s Conditional Use Permit (CUP) and, thus, would require subsequent environmental analysis.

Response to Comment 2-6

The project will contribute towards regional roadway improvements, including the State Highway System, through payment of the required Placer County Newcastle/Horseshoe Bar/Penryn and South Placer Regional Transportation Authority traffic impact fees.

Response to Comment 2-7

The comment does not address to the adequacy of the Draft EIR. The County will be sure to include the commenter on any future correspondence list regarding the proposed project.

Letter 3

Shirlee Herrington

From: Metzger, Annalise@Wildlife <Annalise.Metzger@wildlife.ca.gov>
Sent: Friday, September 14, 2018 11:05 AM
To: Placer County Environmental Coordination Services
Subject: Comment: United Auburn Indian Community School Project DEIR (SCH 2017102081)

Attn: Shirlee Herrington

Dear Ms. Herrington,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Draft Environmental Impact Report (DEIR) from Placer County for the United Auburn Indian Community School Project (Project) (SCH 2017102081) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its Trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). Based on the Project description, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority (Fish & G. Code, § 1600 et seq.). If the implementation of the Project as proposed may result in "take" as defined by Fish and G. Code § 86 of any species listed pursuant to the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), CDFW may authorize the Project's take by permit. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Act, and other provisions of the Fish and Game Code that afford protection to California's fish and wildlife resources.

Project Description

The proposed Project includes demolition of all buildings within the Project area and construction of approximately 48,650 square feet of new structures. These structures include a UAIC Pre-K through 8th grade school, a Tribal Education Center, and a Tribal Cultural Center, all on the northern third of the Project site. Access to the Project site would be provided via Taylor Road. The proposed Project would also include associated infrastructure improvements to support the proposed development. These infrastructure improvements may include, but are not limited to, the extension of a sewer line through the southern two-thirds of the Project site and enhancements to a 0.97 acre pond located on the Project site.

Letter 3 Cont'd

Migratory Birds and Birds of Prey

Nesting Birds and Raptors

The Project has the potential to disturb bird species or nests protected under the Migratory Bird Treaty Act (MBTA), Fish and Game Code § 3503 and § 3503.5. Species with the potential to occur within the Project area and/or species that have occurred within five (5) miles of the Project area include but are not limited to: Swainson's Hawk (*Buteo swainsoni*), White-tailed kite (*Elanus leucurus*), California Black Rail (*Laterallus jamaicensis coturniculus*), Bald Eagle (*Haliaeetus leucocephalus*), Osprey (*Pandion haliaetus*), and Tricolored Blackbird (*Agelaius tricolor*). Since Project activities may occur during the nesting season (determined by region, species, and climate), construction activities could result in disturbance to nesting raptors and other migratory birds. Raptors and other migratory birds are protected under the MBTA and Fish and Game Code § 3503.5; therefore, potential impacts may be considered potentially significant unless adequate avoidance, minimization and/or mitigation is incorporated. If nests are identified on or adjacent to the Project site, implementation of the Project may adversely impact the success of the nest site and/or take a bird, their eggs and/or nest.

3-2

Mitigation Measures 5-4(a) states that preconstruction surveys will be conducted within 14 days prior to the start of construction. CDFW recommends that this is changed to three (3) days prior to the start of construction. In addition, if there is a break in construction activity of more than 14 consecutive days or if there is a change in the level of disturbance at a site, then subsequent surveys should be conducted. All measures to protect birds should be behavior-based. While some birds may tolerate disturbance within 500 feet of construction activities, other birds may have a different disturbance threshold and "take" (Fish and G. Code § 86) could occur if the no-work buffers are not designed to reduce stress to that individual pair. CDFW recommends including performance-based protection measures for avoiding all nests protected under the Migratory Bird Treaty Act and Fish and Game Code § 3503.5. A 500-foot no-work buffer may be sufficient; however, that buffer may need to be increased based on the birds' tolerance level to the disturbance.

Below is an example of a behavior--based protection measure:

Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the exclusionary buffer will be increased such that activities are far enough from the nest to stop this agitated behavior. The exclusionary buffer will remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with CDFW.

The best method is to have a qualified biologist onsite monitoring activities as birds may nest within pipes or on cleared ground. The removal of a nest tree even if it is not within the breeding season may still constitute a significant impact especially for Swainson's hawk, a state-threatened species listed under CESA and one that has high nest site fidelity. Fish and Game Code § 3503 and § 3503.5 does not specify the nest must be active.

Burrowing Owl

The DEIR states that suitable habitat for burrowing owl is present on and adjacent to the Project site. Measure 5-3(a) states that a single take avoidance survey shall be conducted between 14 days to 30 days prior to commencement of construction and/or other maintenance activities. Under the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012), CDFW recommends a qualified biologist will complete four surveys for burrowing owl. The biologist will conduct 4 survey visits: 1) at least one site visit between 15 February and 15 April, and 2) a minimum of three survey visits, at least three weeks apart, between 15 April and 15 July, with at least one visit after 15 June. Surveys will be conducted on the Project site and within 150 meters of areas that will be directly or indirectly impacted by the Project, where feasible. Surveys shall not be conducted during inclement weather, when burrowing owls are typically less active and visible. If burrowing owls or evidence of burrowing owls (e.g., whitewash or pellets) are not observed during surveys, no additional mitigation is necessary. If the birds are present, then there is potential for impacts to occur and the Project proponent to take a bird protected under Fish and Game Code.

3-3

**Letter 3
Cont'd**

Swainson's Hawk

3-4

There are numerous occurrence records within a 10-mile radius of the Project (CDFW 2018; CNDDDB layer in BIOS). The loss of nesting and foraging habitat due to agricultural and urban expansion has greatly reduced the breeding range and abundance of Swainson's Hawk in California (CDFW 1993; 5-year Status Review: Swainson's Hawk). The Project proposed to remove 104 trees, in which some could serve as suitable nest trees for Swainson's Hawk. Mitigation Measure 5-5(a) and 5-5(b) do not analyze the loss of a nest tree or use of the nest tree after construction is complete and during Project implementation (the urbanization of the area). CDFW recommends that the analysis consider these potentially significant impacts to Swainson's Hawk foraging habitat. The EIR should propose mitigation for the loss of foraging habitat so the impacts to the project can be reduced to a less than significant level. Mitigation strategies should be subject to CDFW approval.

3-5

The proposed Project along with all the development surrounding this site has cumulatively impacted the biological resources in the area. Even if Swainson's Hawk is not observed nesting within a half-mile of the Project site as discussed in Mitigation Measure 5-5(a), the Project is contributing the loss of foraging habitat for this state-listed raptor and other non-listed raptors, reducing the availability of foraging habitat for these species and resulting in their decline. CDFW recommends that the EIR describe the cumulative loss of foraging habitat and describe ways in which the Project could avoid, minimize and mitigate furthering that loss.

Threatened, Endangered and Special Status Species

Townsend's Big-Eared Bat

3-6

There is at least one occurrence of Townsend's Big-Eared Bat, a CDFW Species of Special Concern, within five (5) miles of the Project area. CDFW recommends that a Designated Bat Biologist shall survey each structure in the Project area and 500 feet surrounding each structure. CDFW recommends that the EIR contain the survey to identify if there are potential impacts to bats and propose avoidance, minimization, and mitigation measures to reduce any impacts to Townsend's Big-Eared Bat, in addition to those of Pallid Bat to a level of less than significant. If any bats are found on the Project site, CDFW recommends that potential impacts to the species be addressed in the EIR and a mitigation plan should be developed and proposed to be approved by CDFW.

Pallid Bat

3-7

Mitigation Measure 5-7(a) states that preconstruction surveys will be conducted within 14 days prior to the start of construction. CDFW recommends that this is changes to three (3) days prior to the start of construction. In addition, if there is a break in construction activity of more than 14 consecutive days or if there is a change in the level of disturbance at a site, then subsequent surveys should be conducted.

Western Pond Turtle

3-8

Mitigation Measure 5-2(a) states that the sign in sheet from worker education and awareness will be submitted to the Placer County Community Development Resource Agency. CDFW recommends that a copy be available upon CDFW request.

3-9

Mitigation Measure 5-2(a) states that if Western Pond Turtle (WPT) is found in the vicinity of the Project area, it/they shall be relocated away from the construction zone, but within the Project site. Western Pond Turtle is a CDFW Species of Special Concern. CDFW recommends a preconstruction survey to determine if WPT are present within the Project area. If WPT are found on the Project site, CDFW recommends that potential impacts to the species be addressed in the EIR and a mitigation plan should be developed and proposed to be approved by CDFW. CDFW also recommends that relocation sites be located prior to construction and should be based on available and appropriate habitat, site topography, and physical features present.

California Endangered Species Act

**Letter 3
Cont'd**

3-10

CDFW has regulatory authority pursuant to California Endangered Species Act (CESA) over Projects that have the potential to result in the take of any species of wildlife designated by the California Fish and Game Commission as an endangered, threatened, rare or candidate species. Fish and Game Code § 86 defined "take" as: to "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture, or kill". Take of species protected pursuant to CESA is prohibited (Fish and G. Code § 2080). However, CDFW may authorize the take of these species by permit if the conditions set forth in Fish and Game Code § 2081, subdivisions (b) and (c) are met (See also Cal. Code Regs., title 14, § 783.4).

Oak Woodlands

Impact 5-9 states that only 22 Protected Trees are proposed for removal, however materials provided to the Department for notification for lake and streambed alteration state that 35 trees are Protected under Placer County's tree ordinance. CDFW recommends the total numbers are checked and updated to reflect the most current Project description.

3-11

The EIR should discuss the Project's impact on native oaks. CDFW recommends the Project be designed so that the loss of oak trees is avoided. Every effort should be made to retain and protect "heritage" oaks, those in excess of 24 inches in diameter at breast height. There are 4 "heritage" oaks proposed for removal for the Project. If the loss of oak trees is unavoidable, then a mitigation plan should be developed which includes the following:

- Establishment and maintenance procedures to restore the canopy cover, spatial arrangement, age class distribution and species composition of the oak woodland lost.
- A provision that oak seedlings or acorns be obtained from local genetic stock.
- A restoration site located within contiguous areas of no less than five acres and adjacent to undisturbed or preserved oak woodlands.

Lake and Streambed Alteration

The jurisdiction delineation prepared for the U.S. Army Corps of Engineers (USACOE) for the project should not be used to evaluate the project's impacts to streambed and riparian habitat because the specific methods used by the USACOE to delineate Waters of the U.S. (such as use of ordinary high water mark) often exclude fish and wildlife resources that may be impacted by activities subject to notification under Fish and Game Code § 1602.

3-12

For any activity that will substantially divert or obstruct the natural flow of or substantially change or use any material from the bed, channel, or bank of any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, the Project applicant (or "entity") must provide written notification CDFW pursuant to Fish and Game Code § 1602. Based on this notification and other information, CDFW then determines whether a Lake or Streambed Alteration (LSA) Agreement is required. CDFW's issuance of an LSA Agreement is a "Project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the EIR should fully identify the potential direct and indirect impacts to the lake, stream and/or associated fish and wildlife resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments. CDFW recommends United Auburn Indian Community notify pursuant to Fish and Game Code § 1602 as early as possible, as modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or streambed Alteration notification package, please go to:
<https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

The Project has potential to significantly impact fish and wildlife resources, most notably with enhancements to the 0.97 acre pond located within the Project area. CDFW recommends specific, enforceable mitigation measures designed to avoid, minimize, and mitigate impacts to the resource and any fish and wildlife resources dependent on the pond

**Letter 3
Cont'd**

**3-12
Cont'd**

including, but not limited to largemouth bass (*Micropterus salmoides*) and mosquitofish (*Gambusia affinis*). Any pond enhancement activity or grading activity within the Project area may be subject to Notification under Fish and Game Code § 1600 et seq. The DEIR states that "high visibility/silt fencing shall be erected at the edge of construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance". CDFW recommends that the 50 feet buffer zone be expanded and the buffer be determined by site topography and physical features present.

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

3-13

References

DFG. 2012. Staff Report on Burrowing Owl Mitigation.
CDFW Nongame Bird and Mammal Program. 1993. 5-year Status Review: Swainson's Hawk. Reported to: California Fish and Game Commission.

Thank you for considering our comments. If you could please reply and let me know you received this email, it would be greatly appreciated. Department personnel are available for consultation regarding biological resources and strategies to minimize impacts. If you have questions, please do not hesitate to contact me.

Regards,

Annalise Metzger, Environmental Scientist

Annalise Metzger
Environmental Scientist
Department of Fish and Wildlife
North Central Region
Habitat Conservation Program
annalise.metzger@wildlife.ca.gov
Office: 916-358-1097

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LETTER 3: ANNALISE METZGER, CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Response to Comment 3-1

The comment is an introductory statement that does not address the adequacy of the Draft EIR.

Response to Comment 3-2

In response to the comment, Mitigation Measure 5-4(a), on page 5-44 of the Draft EIR, is revised as follows:

- 5-4(a) *Prior to initiation of ground-disturbing activities, including activities associated with the off-site signalization improvement at the Taylor Road/Penryn Road intersection, if construction is expected to occur during the raptor nesting season (February 15 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal. The pre-construction survey shall be conducted within ~~14~~ three days prior to commencement of ground-disturbing activities. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required. If construction does not commence within ~~14~~ three days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required.*

In addition, Mitigation Measure 5-4(b), on page 5-45 of the Draft EIR, is revised as follows:

- 5-4(b) *If any active nests are located within the study area, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically between 100 feet and 250 feet for migratory bird nests and between 250 feet and 500 feet for a raptor nest. If active nests are found within the project footprint, a qualified biologist shall monitor nests ~~weekly during~~ daily for a minimum of five days to ensure that construction activities are not disturbing the nest. ~~to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest immediately following a construction noise or vibration, then the biologist shall increase the exclusionary buffer such that activities are far enough from the nest to stop this agitated behavior. The biologist shall subsequently monitor the nest for an additional five days to ensure that construction activities are not disturbing the nest. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with CDFW.~~*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their

habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-4(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

The above changes constitute minor adjustments to the existing Draft EIR mitigation measures, made in response to CDFW comments. The changes do not alter the conclusions of the Draft EIR.

With regard to the comment about inactive Swainson's hawk nests, it is noted that Swainson's hawk nests are not documented within the project site or within 5 miles of the project site. Removal of trees would not result in the removal of a remnant Swainson's hawk nest tree, in accordance with the CDFW 1994 guidance.

Response to Comment 3-3

Proposing that four surveys be conducted during different times of the year is useful for planning purposes, when the project site is in an area where burrowing owl routinely occur, so that, if owls are occupying the site, the project applicant has sufficient time to prepare a relocation plan and submit to the CDFW for approval prior to the start of construction. Burrowing owl are not documented within 5 miles of the project site, so the likelihood for burrowing owl to inhabit the project site is low. A single take avoidance measure satisfies the requirements under CEQA. In the event that active burrows are detected during the preconstruction survey, delay of construction activities may be required, as necessary, to fulfill the requirements of Mitigation Measure 5-3(b).

Response to Comment 3-4

Swainson's hawk nests are not documented within the project site or within 5 miles of the project site. Removal of trees would not result in the removal of unoccupied Swainson's hawk nest trees, in accordance with CDFW's (1994) guidance.

As discussed on page 5-46 of the Draft EIR, nest trees are not documented within a 10-mile radius within the last 5 years. Therefore, mitigation for loss of annual grassland associated with the proposed project would not be warranted based on current data. In addition, as discussed in Chapter 11, Cumulative Impacts and Other CEQA Sections, of this EIR, per the Horseshoe Bar/Penryn Community Plan Final Program EIR (Community Plan EIR), buildout of the Community Plan Area, including the proposed project site, would result in a significant and unavoidable impact related to loss of oak woodland and savanna habitats, loss of special-status plant species, and effects on special-status wildlife species. Given that the proposed project would be consistent with the existing land use and zoning designations of the project site, habitat loss associated with buildout of the site has been previously considered per the Community Plan EIR. Considering that impacts related to the forgoing issues was previously considered in the Community Plan EIR, per Section 21083.3 of CEQA, this EIR may focus on potential impacts that would be unique to the

proposed project that have not previously been addressed in prior EIRs, such as the Community Plan EIR.

Furthermore, as noted on page 5-45 of the Draft EIR, the majority of the nesting and foraging habitat present on-site would be preserved as part of the proposed project design. Specifically, of the 6.74 acres of on-site valley foothill riparian habitat, which contains potential nesting trees, only 0.42-acre would be impacted by the project. Similarly, of the 20.69 acres of annual grassland habitat that provides suitable foraging habitat, approximately half (10.25 acres) would be impacted by the project.

Response to Comment 3-5

The habitat loss resulting from the proposed project would combine with related impacts resulting from buildout of the Horseshoe Bar/Penryn Community Plan, as well as buildout of other reasonably foreseeable projects within the project region. As discussed in Chapter 11, Cumulative Impacts and Other CEQA Sections, of this EIR, per the Horseshoe Bar/Penryn Community Plan Final Program EIR (Community Plan EIR), buildout of the Community Plan Area, including the proposed project site, would result in a significant and unavoidable impact related to loss of oak woodland and savanna habitats, loss of special-status plant species, and effects on special-status wildlife species. Given that the proposed project would be consistent with the existing land use and zoning designations of the project site, habitat loss associated with buildout of the site has been previously considered per the Community Plan EIR. Considering that impacts related to the forgoing issues was previously considered in the Community Plan EIR, per Section 21083.3 of CEQA, this EIR may focus on potential impacts that would be unique to the proposed project that have not previously been addressed in prior EIRs, such as the Community Plan EIR. Furthermore, approximately 62 percent of the project site would remain undisturbed after project completion, as development would primarily occur on the northern third of the site. With the exception of a proposed unpaved sewer maintenance access road, the southern two-thirds of the project site would remain vacant and undeveloped. Existing oak woodland along the eastern and southern boundaries of the proposed project site would be retained.

Response to Comment 3-6

In response to the comment, Impact 5-7, and Mitigation Measure 5-7(a), on page 5-49 of the Draft EIR, have been revised as follows:

- 5-7 Have a substantial adverse effect, either directly or through habitat modifications, on ~~pallid~~ special-status bats. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.**

As discussed previously, roost sites for pallid bat typically include caves, crevices in rocky outcrops and cliffs, mines, trees, and various manmade structures (e.g., bridges, barns, porches), and generally have unobstructed entrances/exits. In addition, roosts are often high above the ground, warm, and inaccessible to terrestrial predators. Within the proposed project site, trees and structures within the annual grassland (20.69 acres), valley foothill riparian (6.74 acres), and interior live oak (10.56 acres) provide roosting habitat for the species. The structures would

be demolished and some of the trees would be removed. As shown in Figure 5-3, the proposed project would impact approximately 10.25 acres of annual grassland, 0.42-acre of valley foothill riparian, and 0.51-acre of interior live oak. Based on the above, pallid bat has the potential to occur within the proposed project site. In addition, pallid bat could occur within trees that may require removal as part of the off-site Taylor Road/Penryn Road signalization improvement.

With respect to Townsend's big-eared bat, the Biological Resources Study Report for the project site determined that the site does not provide roosting habitat for this species. However, at least one occurrence of Townsend's big-eared bat, a CDFW Species of Special Concern, is located within five miles of the project site. Out of an abundance of caution, structures should be surveyed prior to demolition to verify presence/absence of this species.

Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on pallid special-status bats. Thus, a **significant** impact could occur.

Mitigation Measure(s)

Implementation of the following mitigation measures would reduce the above impact to a **less-than-significant** level.

5-7(a) *Prior to the removal of suitable trees (larger than 24 inches in diameter at breast height [DBH]) or demolition of existing buildings, a qualified biologist shall conduct a pre-construction survey for special-status bats within ~~14~~three days prior to the start of their removal. If special-status bats are not observed roosting, then a letter report documenting the results of the survey shall be provided to the applicant for their records and submitted to the Placer County Community Development Resource Agency, and additional measures are not required. If tree removal or building demolition does not commence within ~~14~~three days of the pre-construction survey, or halts for more than 14 days, a new survey shall be required.*

The above changes do not alter the conclusions of the Draft EIR.

Response to Comment 3-7

Please see Response to Comment 3-6.

Response to Comment 3-8

In response to the comment, Mitigation Measure 5-2(a), on page 5-42 of the Draft EIR, is hereby revised as follows:

5-2(a) *A worker education and awareness program shall be provided to all on-site personnel by a qualified biologist prior to the commencement of any construction activity including materials staging and ground-disturbing*

activities. The biologist shall explain to construction workers how best to avoid impacts to western pond turtle and shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Handouts, illustrations, photographs, and project mapping showing areas where minimization and avoidance measures would occur may be included as part of the education program. The crew members shall sign a sign-in sheet documenting that they received the training. The completed sign-in sheet shall be submitted to the Placer County Community Development Resource Agency and the California Department of Fish and Wildlife, upon request.

The above changes do not alter the conclusions of the Draft EIR.

Response to Comment 3-9

In response to the comment, Mitigation Measure 5-2(b), on page 5-42 of the Draft EIR, is hereby revised as follows:

5-2(b) *A qualified biologist shall conduct a pre-construction survey within three days prior to vegetation removal, pond draining, and initial grading activities. During the pre-construction survey, the biologist will locate suitable relocation sites based on suitable aquatic and upland habitat within the project site. All vegetation removal, pond draining, and initial grading activities associated with construction and maintenance activities shall be conducted under the supervision of a qualified biologist. If any western pond turtles are detected in the vicinity of the project footprint, the biological monitor shall relocate any western pond turtles found within the construction footprint to suitable habitat away from the construction zone, but within the project site. A letter report documenting the biological monitoring shall be submitted to the Placer County Community Development Resource Agency within 14 days following the final monitoring event.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-2(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

The above changes do not alter the conclusions of the Draft EIR.

In addition, it is noted that the mitigation measure adequately mitigates for western pond turtle under CEQA. Western pond turtle is not a State or federal listed species. Western pond turtle is a

Species of Special Concern. The submittal of a mitigation plan to the CDFW for approval is not necessary to adequately mitigate impacts under CEQA.

Response to Comment 3-10

The comment is informational and does not specifically address the adequacy of the Draft EIR.

Response to Comment 3-11

Table 5-4 and accompanying text on page 5-52 of the Draft EIR identify that 22 trees protected by the County's Tree Preservation Ordinance would be removed during project development. These numbers are accurate and reflect the latest project design.

The project has been designed to avoid impacting oak trees to the extent feasible. For example, per the Arborist Report, a total of 256 oak trees are located on-site. Only 17 oak trees would be removed during project construction. The existing mitigation measure 5-9(a) complies with the Placer County Code and adequately mitigates for the removal of all protected trees, including oak trees.

Response to Comment 3-12

The reason the UAIC wants to enhance the pond is because it is overrun by Himalayan blackberry and the pond water is covered with azolla, which reduces oxygen in the water for wildlife. Largemouth bass and mosquitofish are introduced species that are not native to California and outcompete native species. Mitigation Measure 5-10(a) already states that silt fencing would be constructed at the edge of the construction footprint for work within 50 feet of jurisdictional features and riparian areas. It would be infeasible to expand the avoidance buffer if the construction footprint is within 50 feet of these features.

Response to Comment 3-13

Any special-status species detected during surveys required by the Draft EIR will be reported to CDFW.

Letter 4



Matthew Rodriguez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Edmund G. Brown Jr.
Governor

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SEP 27 2018

CDRA

September 21, 2018

Ms. Shirlee Herrington
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, California 95603

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT, 3141 TAYLOR ROAD,
PLACER COUNTY, CALIFORNIA

Dear Ms. Herrington:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Environmental Impact Report (EIR) dated August 2018 for the United Auburn Indian Community School Project located at 3141 Taylor Road in Placer County, California (Site). The EIR is the California Environmental Quality Act (CEQA) document that describes the potentially significant environmental effects of the project and the mitigation measures that will be followed to eliminate or reduce these effects. The Final EIR will also be used to meet the CEQA requirements for the Removal Action Workplan (RAW) that will be followed to remove contaminated soil from the Site prior to construction of the school. DTSC appreciates the opportunity to evaluate the Draft EIR and is providing the comments below to ensure the final document fully incorporates the RAW.

4-1

- *Section 1.5 Scope of the EIR:* This section should include a brief description of the RAW effort within the 6th bullet titled *Hazards and Hazardous Materials*. The description should indicate that an estimated 1,400 cubic yards of soil contaminated with metals from past use of the property will be removed from four distinct areas of the project site to ensure the Site is safe for occupants of the planned school.

4-2

- *Section 2.2 Environmental Impacts and Proposed and Recommended Mitigation:* This section should indicate that the effort to remove the contaminated soil will also follow all appropriate mitigation measures to ensure impacts to the environment and the surrounding area are minimized.

4-3

**Letter 4
Cont'd**

Ms. Shirlee Herrington
September 19, 2018
Page 2

4-4

- *Section 3.5 Project Components:* Similar to the first bullet above, this section should include a brief description of the contaminated soil removal effort.

4-5

Incorporating the comments above will ensure that the Final EIR can be used as the official CEQA document for the RAW. Once the EIR is final, DTSC requests that a copy be kept at the public repository to accompany a 30-day public comment period for the RAW. A date for the RAW comment period has not yet been scheduled but DTSC is currently anticipating a start date sometime in November 2018. If you have any questions regarding this letter, please contact me via email at Dean.Wright@dtsc.ca.gov or at (916) 255-6528.

Sincerely,



Mr. Dean Wright, P.G.,
Site Evaluation and Remediation Unit

cc:

Tiffany Ann Wilson, AICP
RSC Engineering
2250 Douglas Blvd., Suite 150
Roseville, California 95661

Mr. Peter M. Langtry, P.G., C.E.G.
Senior Principal Geologist
Cornerstone Earth Group
1270 Springbrook Road, Suite 101
Walnut Creek, California 94597

Richard S. Chavez, P.E.
RSC Engineering
2250 Douglas Blvd., Suite 150
Roseville, California 95661

Randy Boehm
Urban Resources, Inc.
2500 NE Sandy Blvd., Suite B
Portland, Oregon 97232

**Letter 4
Cont'd**

Ms. Shirlee Herrington
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Page 3

cc: (continued)

West Bourgault, P.G.
Hazardous Materials and Solid Waste Supervisor
Placer County Health and Human Services Department
Environmental Health Division
3091 County Center Drive, Auburn, California 95603

Ms. Cheryl Mahoney
Senior Environmental Planner
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826

Mr. Steven Becker, P.G., Chief (electronic copy)
Site Evaluation and Remediation Unit
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826
Steven.Becker@dtsc.ca.gov

LETTER 4: DEAN WRIGHT, DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Response to Comment 4-1

The comment is an introductory statement and does not address the adequacy of the Draft EIR.

Response to Comment 4-2

Based on the comment, the following revisions to text were made on page 1-7:

- *Hazards and Hazardous Materials (Items VIII-1 and -4 through -7):* Although a limited amount of potentially hazardous materials could be used on-site during construction and operations, regulations governing the use of such materials and amount anticipated to be used on site would ensure the routine handling, transport, use, or disposal of such materials would not create a significant hazard to the public or the environment, including through upset or accident conditions. Thus, a *less-than-significant* impact associated with such would occur. It should be noted that the potential for soil contamination related to historical agricultural activities conducted on the project site is addressed in detail in the Hazards and Hazardous Materials chapter of this EIR. As discussed in the chapter, a Removal Action Workplan has been prepared, which would require the necessary cleanup of the site, including removal of approximately 1,400 cubic yards of soil contaminated with metals from past use of the property from four distinct areas of the project site to ensure the site is safe for future occupants of the proposed school. The project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip, and is not in an area subject to a substantial risk due to wildland fires. Thus, *no impact* and/or a *less-than-significant* impact related to hazards associated with such would occur.

Response to Comment 4-3

Based on the comment, the following revision to text was made on page 2-1 in Section 2.2 of the Executive Summary chapter of the Draft EIR:

Under the California Environmental Quality Act (CEQA), a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the existing physical conditions within the area affected by the project, including land, air, water, mineral, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Mitigation measures must be implemented as part of the proposed project to reduce potential adverse impacts to a less-than-significant level. With regards to remediation of contaminated soils, all related mitigation measures would be implemented to ensure impacts related to the environment and surrounding area are minimized. Such mitigation measures are found in the following chapters of this EIR, as well as in the Initial Study for the proposed project (Appendix C): Introduction (Initial Study mitigation measures for Geology and Soils and Hydrology and Water Quality); Biological Resources; Cultural Resources; Hazards and Hazardous Materials; Noise; Transportation and Circulation; and Cumulative Impacts and Other CEQA Sections. Where an impact identified in the EIR

remains significant after implementation of all feasible mitigation measures, the impact is determined to be significant and unavoidable.

Response to Comment 4-4

Section 3.5 within the Project Description chapter of the Draft EIR lists soil remediation pursuant to the Removal Action Workplan as part of the Construction and Phasing on page 3-17. However, based on the comment and to further explain the soil remediation, the following revision to text was made on page 3-17:

The proposed project is planned to be phased as follows:

- Abatement of the buildings for asbestos & lead based paint;
- Demolition of the buildings;
- Soil remediation pursuant to the Removal Action Workplan; and
- School Construction: Buildings A, B and E, primary parking lot, and ballfield.

The potential for soil contamination related to historical agricultural activities conducted on the project site is addressed in detail in the Hazards and Hazardous Materials chapter of this EIR. As discussed in the chapter, a Removal Action Workplan has been prepared, which would require the necessary cleanup of the site, including removal of approximately 1,400 cubic yards of soil contaminated with metals from past use of the property from four distinct areas of the project site to ensure the site is safe for future occupants of the proposed school.

Response to Comment 4-5

The County will notify the Department of Toxic Substance Control (DTSC) upon completion of the Final EIR and will include DTSC on all future correspondence regarding the EIR. The County will comply with the necessary processing and filing requirements for the Final EIR pursuant to CEQA.

Letter 5



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SEP 27 2018

CDRA



Central Valley Regional Water Quality Control Board

24 September 2018

Shirlee Herrington
County of Placer
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

CERTIFIED MAIL
7014 3490 0001 3008 4200

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT, SCH# 2017102081, PLACER COUNTY

5-1

Pursuant to the State Clearinghouse's 17 August 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environment Impact Report* for the United Auburn Indian Community School Project, located in Placer County.

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

5-2

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley



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United Auburn Indian
Community School Project
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Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:
http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

5-3

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

5-4

II. Permitting Requirements

Construction Storm Water General Permit

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

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requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

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

5-5

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

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

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

5-6

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

5-7

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by

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

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United Auburn Indian
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Cont'd

the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

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

5-8

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

5-9

Waste Discharge Requirements – Discharges to Waters of the State

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

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

5-10

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver)

R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

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United Auburn Indian
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For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

5-11

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands_for_growers/apply_coalition_group/index.shtml or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

5-12

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from*

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United Auburn Indian
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Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

5-13

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Senior Environmental Scientist

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

LETTER 5: STEPHANIE TADLOCK, CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

Response to Comment 5-1

The comment is an introductory statement and does not address the adequacy of the Draft EIR.

Response to Comment 5-2

The comment provides background regarding the responsibilities of the Central Valley Regional Water Quality Control Board in adopting and updating Basin Plans. The State Water Resources Control Board is discussed on page 10-9, within the Utilities and Service Systems chapter of the Draft EIR. The project site is located within the jurisdiction of the Central Valley Regional Water Quality Control Board.

Response to Comment 5-3

General wastewater treatment and conveyance is discussed on a project-level in Impact 10-1 of Chapter 10, Utilities and Service Systems, of the DEIR, and on a cumulative level on pages 11-44 and 11-45 of the Cumulative Chapter within the Draft EIR. As shown in the foregoing sections of the Draft EIR, the proposed project was not found to have a significant effect on high quality waters.

Response to Comment 5-4

As stated on page 34 of the Initial Study prepared for the proposed project, and included as Appendix C of the Draft EIR, in regards to ground-disturbing activity:

Improvement Plans provided to the County prior to authorization of construction would conform to provisions of the County Grading Ordinance (Article 15.48, Placer County Code) and the Stormwater Quality Ordinance (Article 8.38, Placer County Code) that are in effect at the time of submittal. The preparation of and compliance with a stormwater pollution prevention plan (SWPPP) would be part of the project's NPDES construction stormwater quality permit, issued by the Central Valley Regional Water Quality Control Board (CVRWQCB). Before Improvement Plan approval, the Placer County ESD would require evidence of the State-issued Waste Discharge Identification Number or filing of the Notice of Intent and fees. The SWPPP would include strategies to manage stormwater from the construction site and treat runoff before being discharged from the site. The site-specific SWPPP developed for the project would have protocols to be followed and monitored during construction, including effective response actions if necessary. The SWPPP is considered a "living document" that could be modified as construction activities progress.

In light of the above, the Initial Study prepared for the proposed project included Mitigation Measure VI.4 and VI-5, which require that implementation of the proposed project conform with the above requirements for a SWPPP, and conform with the requirements of the RWQCB. Additionally, the foregoing mitigation measures require proof of compliance with the RWQCB's

regulations be submitted to the Engineering and Surveying Division of Placer County. Therefore, the proposed project would conform with all permitting requirements related to construction storm water.

Response to Comment 5-5

As discussed in Items IX-3 through IX-7 of the Initial Study prepared for the proposed project, included as Appendix C of the Draft EIR, the proposed project would include best management practices (BMPs) and low impact development (LID) measures in order to comply with all applicable storm water requirements including the MS4 NPDES permitting. Compliance with the Phase I and II MS4 permitting requirements would be ensured by Mitigation Measures IX.1 through IX.8, which were included in the Initial Study prepared for the proposed project.

Response to Comment 5-6

The project does not include any industrial uses, and would not result in stormwater discharge associated with industrial sites.

Response to Comment 5-7

The proposed project addresses the required Section 404 permitting in pages 5-60 through 5-63 within the Biological Resources chapter of the Draft EIR. The mitigation measure pertaining to the disruption of wetlands is as follows:

5-10(a) *High visibility and silt fencing shall be erected at the edge of construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.*

5-10(b) *Prior to Improvement Plan approval for the project, a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE “no-net-loss” policy. To the extent feasible, however, the project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area. Mitigation for impacts to both federal and State jurisdictional waters shall be addressed using these guidelines.*

If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.

5-10(c) Prior to Improvement Plan approval for areas that would affect any Valley foothill riparian, lacustrine pond, riverine drainage, drainage ditch or seasonal wetland habitat(s), the applicant shall enter into a 1600 Streambed Alteration with CDFW. This agreement would include measures to minimize and restore riparian habitat. The 1600 Streambed Alteration Agreement would require the project proponent to prepare and implement a riparian vegetation mitigation and monitoring plan for disturbed riparian vegetation. Written verification of the 1600 Streambed Alteration Agreement shall be submitted to the Placer County Community Development Resource Agency.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-10(a), 5-10(b), and 5-10(c) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

5-10(d) Taylor Road/Penryn Road Signal. Prior to Improvement Plan approval, the project applicant shall submit a wetland delineation for the off-site Taylor Road/Penryn Road intersection improvement area that has been verified by the US Army Corps of Engineers. If USACE verifies that jurisdictional features are located within the signalization improvement area, and the improvements would result in discharge of fill within the feature(s), then a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE "no-net-loss" policy. To the extent feasible, however, the signalization project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area.

If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.

Implementation of the foregoing mitigation measures would ensure that proper permitting is acquired for any potential fill of jurisdictional wetlands, and, should a Section 404 permit be obtained, the project applicant shall further be required to obtain a water quality certification from the CVRWQCB.

Response to Comment 5-8

Please see Response to Comment 5-7 above.

Response to Comment 5-9

The US Army Corps of Engineers determined that waters of the State are not present on the property, and thus, the project would not require a Waste Discharge Requirement permit.

Response to Comment 5-10

Groundwater dewatering would not be required for this project because the project's shallowest groundwater occurs about 15 to 20 feet below the ground surface, and construction of the project would not extend that far below the surface. Thus, the comment does not pertain to the adequacy of the Draft EIR.

Response to Comment 5-11

The proposed project would not be used for commercial irrigated agriculture; thus the comment does not address the adequacy of the Draft EIR.

Response to Comment 5-12

Please see Response to Comment 5-10 above.

Response to Comment 5-13

Please see Responses to Comments 5-4 and 5-5 above.

Letter 6



South Placer Municipal Utility District
5807 Springview Drive
Rocklin, CA 95677
(916) 786-8555

September 28, 2018

Emily Setzer
Placer County – Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

**Subject: UAIC Tribal School (PLN17-00018) – Draft Environmental Impact Report
3141 Taylor Road
APN 043-013-010-000**

Dear Ms. Setzer,

6-1

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the UAIC Tribal School in unincorporated Placer County, east of the Town of Loomis. SPMUD understands that the proposed project consists of demolition of existing onsite structures and construction of a UAIC Pre-K through 8th grade school, A Tribal Education Center, and a Tribal Cultural Center on the northern third of the project site. The proposed structures would total approximately 48,650 square feet. Access to the proposed project site would be provided via Taylor Road to the north of the Site. The project would include associated infrastructure improvements to support the proposed development.

The design and construction of all on-site and off-site facilities which may be required as a result of this project, including the acquisition and granting of sewer easements, will be the responsibility of the developer/owner. All work shall conform to the Standard Specifications of SPMUD. Improvement plans shall be submitted to SPMUD for review and approval. A copy of the District's facility map has been provided for your use.

The District has reviewed the DEIR submitted and the following comments apply:

6-2

a. The above referenced property is outside of the SPMUD boundary and must be annexed into the District before a will-serve letter for sewer service can be issued. Attached is an outline of the annexation process for reference. The applicant is encouraged to contact Placer Local Agency Formation Commission (LAFCO) to understand the requirements and timing of the annexation process.

6-3

b. The above referenced property is located within the boundary area of two current refund agreements for trunk sewer improvements constructed downstream which serve this property. The current total of the additional fees required at the time of plan approval for these refund agreements are \$208.08 per EDU (\$68.32 + \$139.76).

6-4

c. Based on the review of record drawings, the project will be required to construct sewer improvements through private property (APN 043-240-019-000) to connect to the closest existing public sewer.

6-5

d. All-weather, drivable access is required over the sewer line. The District's current standards define drivable access as 3-inches of AC on 8-inches of AB; however, the District

1 of 2

**Letter 6
Cont'd**



South Placer Municipal Utility District
5807 Springview Drive
Rocklin, CA 95677
(916) 786-8555

6-5
Cont'd

is open to alternative surface treatments if it can support a 46,000-pound maintenance vehicle and meet operations and maintenance requirements.

- e. Access over the sewer line is required whether the sewer is public or private.
- f. The District will require a sewer access easement to access the existing manhole O14-028 (tie-in location) as well as over the proposed sewer pipe if proposed public. Note that an exhibit will be required in order to demonstrate the District's turning movements and ability to drive over the sewer line (centerline turning radius of 45-feet) with turn-around area at the connection to the existing sewer line.

6-6

- g. Modeling may be required in order to confirm that the existing 6-inch DIP is adequate to handle the existing and proposed flows. Upsizing of existing sewer lines may be required.

6-7

- h. Backwater valves may be required depending on the pad elevation and the upstream manhole elevation.

6-8

- i. Access to the grease interceptor will be required for inspection and maintenance purposes.

6-9

- j. Bolt-down manhole lids will be required for all manholes not located within right-of-way.

6-10

- k. A sewer easement will be required between the District's existing sewer easement and the UAIC property line near the connection with public sewer.

- l. A property line cleanout will be required at the edge of the District's easement.

- m. Permanent structures are not allowed within the District's easement. Trees, including the drip line, may not be planted within the District's sewer easements.

Additional requirements may be required as design information is provided.

Prior to issuing a will-serve letter for sewer service, the owner and/or owner's representative will need to schedule a meeting with District staff in order to discuss the project and to determine specific requirements.

6-11

Please note that the District's Standard Specifications and Improvement Standards for Sanitary Sewers can be viewed at SPMUD's website: <http://spmud.ca.gov/developer-resources/standards-specifications/>.

Please do not hesitate to contact me at (916) 786-8555 extension 311 or chuff@spmud.ca.gov if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads 'Carie Huff'.

Carie Huff, P.E.

Attachments:

Annexation Process Outline
SPMUD Facility Map

**Letter 6
Cont'd**

ANNEXATIONS TO SPMUD

Properties are annexed to SPMUD in two manners:

- 1) by **separate** annexation action processed through SPMUD (*Sections 14051 and 14052 of the MUD Act*), or
- 2) by a **concurrent** annexation action to a City or Town within the District (*Sections 13911 and 13912 of the MUD Act*).

All annexations must be approved by the Placer Local Agency Formation Commission (LAFCO) to become effective.

I. GENERAL REQUIREMENTS

- Property must be within the District's Sphere of Influence.
- Property must be contiguous to the existing District Boundary.
- Property must have a demonstrated need to be in the District (i.e. Development of the property is being proposed/pursued and sewer is/will be required; property is on septic and has a need to connect to sewer).

6-12

II. FEES

- **Annexation Fee to SPMUD**: Fee varies from \$1500 per annexation to \$6000 or more per annexation depending on the type and size and complexity. (See Resolution 10-2 and SPMUD Fee Schedule Budget for changes to the amount of the annexation fee).
- **LAFCO Fees**: Fees vary and are collected separately by LAFCO. (Contact LAFCO for amounts).
- **State Board of Equalization Filing Fee**: Fee varies and is collected by LAFCO (Payments must be made out to the State Board of Equalization). (Contact LAFCO for amounts).

III. PROCEDURE OVERVIEW—SEPARATE ANNEXATIONS to SPMUD

- 1- Applicant makes initial inquiry at SPMUD staff level.
- 2- Applicant submits written request to the District requesting initiation of the annexation and submits:
 - a. Application Form
 - b. Annexation Fee
 - c. Legal property owner's consent for annexation
 - d. Legal description of property
 - e. Proposed development plan/method of sewerage of the property
- 3- Application and request is prepared/submitted to the SPMUD Board of Directors for consideration/approval of Resolution of Support.

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- 3- Application and request is prepared/submitted to the SPMUD Board of Directors for consideration/approval of Resolution of Support.

**Letter 6
Cont'd**

**6-12
Cont'd**

4- Resolution of Support (Certified Copy) provided to applicant

5- Applicant petitions LAFCO for annexation.

(Additional processing between SPMUD and LAFCO at this time: SPMUD prepares "Narrative/Plan for Services. Tax share negotiations/letter, if pursued)

6- LAFCO acts on the annexation

7- LAFCO Certificate of Completion filed, and property is effectively annexed to SPMUD.

(Note: Property must be annexed to SPMUD before connections can be made and sewer service provided)

IV. PROCEDURE OVERVIEW—CONCURRENT ANNEXATIONS to SPMUD

1- SPMUD receives "Request/Referral for Comments" from City/Town on annexation/development, and advises of "automatic" annexation provisions. (Copy of letter to developer/applicant.

(All processing of the annexation is between the City/Town and LAFCO)

2- SPMUD receives Certified Copy of City/Town action (Resolution) related to the annexation. The 90-day time period in which the District can file an objection to the annexation begins.

3- Letter to developer/applicant to advise of need to pay annexation fee (before the expiration of the 90-day period). (Note: the due date for payment needs to be sufficiently before an available Board meeting within the 90-days in order for the Board to authorize an objection before the 90-days lapses in case payment is not made).

4A- Annexation Fee is paid to SPMUD within the 90 days.

- SPMUD Board item—no objection and motion to place annexed area into "X" Ward.
- City/Town advised of no objection.
- Letter to LAFCO and Placer County Elections/Mapping advising that no objection was made and that annexed area is designated into Ward "X".

4B- Annexation Fee is not paid to SPMUD within the 90 days.

- SPMUD Board item—objection made.
- Written objection to the annexation filed with the City/town clerk.
- Annexation to SPMUD not effective.

(In order to thereafter annex to SPMUD the process must follow the "Separate" annexation process/procedure outlined above)

(Note: Property must be annexed to SPMUD before connections can be made and sewer service provided)

- 4- Resolution of Support (Certified Copy) provided to applicant
- 5- Applicant petitions LAFCO for annexation.
(Additional processing between SPMUD and LAFCO at this time: SPMUD prepares "Narrative/Plan for Services. Tax share negotiations/letter, if pursued)
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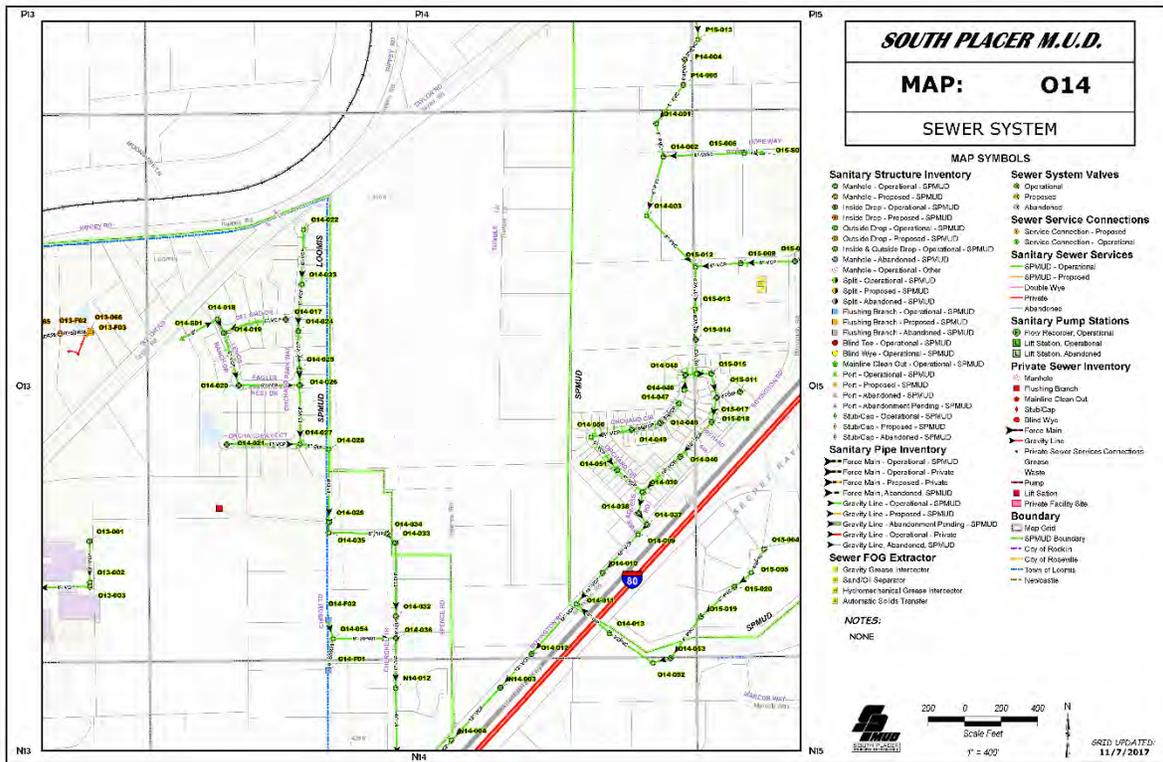
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- SPMUD Board item—objection made.
- Written objection to the annexation filed with the City/town clerk.
- Annexation to SPMUD not effective.

(In order to thereafter annex to SPMUD the process must follow the "Separate" annexation process/procedure outlined above)

(Note: Property must be annexed to SPMUD before connections can be made and sewer service provided)



LETTER 6: CARIE HUFF, SOUTH PLACER MUNICIPAL UTILITY DISTRICT

Response to Comment 6-1

This comment is introductory and does not address the adequacy of the Draft EIR.

Response to Comment 6-2

Annexation into the SPMUD boundary and approval by the Placer County LAFCo of such annexation is discussed in the Project Description chapter of the Draft EIR (see pg. 3-17), as well as in the Utilities and Service Systems chapter of the Draft EIR, specifically on page 10-4, page 10-5, and in Impact 10-1. The comment does not address the adequacy of the analysis provided in the Draft EIR.

Response to Comment 6-3

The project applicant has been made aware of a \$208.08 per EDU fee required at the time of plan approval for two current refund agreements for trunk sewer improvements constructed downstream which serve this property. Payment of such fees is discussed on page 10-18 of the Utilities and Service Systems chapter as well as page 11-44 of the Cumulative Impacts and Other CEQA Sections chapter within the Draft EIR.

Response to Comment 6-4

The required sewer improvements to connect to SPMUD's existing six-inch sanitary sewer main located on private property (within the parcel identified as Assessor's Parcel Number 043-240-019) are described in the Project Description chapter of the Draft EIR. The improvements are discussed in further detail in the Utilities and Service Systems chapter of the Draft EIR, specifically on page 10-25, and shown on Figure 10-8. Such improvements were considered throughout the analysis provided within the Draft EIR.

Response to Comment 6-5

The project applicant has been made aware that drivable access is required over the sewer line and access is required whether the sewer is public or private. The provision of such access is depicted in Figure 10-8 within the Utilities and Service Systems chapter of the EIR, and such improvements were considered throughout the analysis provided within the Draft EIR. As depicted in Figure 10-8, a fence would be replaced with a 16-foot wide access gate centered over the sanitary sewer.

Response to Comment 6-6

As part of a sewer study that was conducted to study the proposed six-inch sewer lines, RSC Engineering found that the existing six-inch sanitary sewer downstream of the proposed UAIC School site has adequate capacity to serve the project. The Draft EIR addresses the future capacity of the existing six-inch sewer line on page 10-26 of the Utilities and Service Systems chapter of the Draft EIR, and states:

Per the Sanitary Sewer Study, accounting for existing development within Sheds 2, 3, and 4, as well as the future development of an additional 22 single-family homes within Shed 3 to account for buildout per Shed 3's current zoning designation, the combined peak flow from Sheds 1 through 4 would be approximately 0.173 mgd, which would be below the allowable/remaining capacity within the downstream six-inch sewer pipe of 0.220 mgd. Thus, the existing six-inch sanitary sewer line downstream of the proposed project site has adequate capacity to serve the proposed project, as well as existing and future development within the other three sheds.

Considering the above information provided within the Draft EIR, and the additional modeling information provided in the sanitary sewer study prepared by RSC Engineering for the proposed project, included as Appendix N of the Draft EIR, the existing six-inch sewer line would have adequate capacity to accommodate existing and future development, including the proposed project, within the three contributing sheds.

Response to Comment 6-7

At the time of preparation of the Draft EIR, project specific plans had not yet been finalized. As such, final designs for backwater valves, grease interceptor access and bolt-down manhole lids have not been finalized; however, future design of such features would be required by SPMUD to meet SPMUD's standards. Furthermore, such features are design-level considerations that would not affect the adequacy of the analysis of the Draft EIR.

Response to Comment 6-8

Sewer easements are discussed on page 10-25 in the Utilities and Service Systems chapter of the Draft EIR. As discussed in the section, a 10-foot easement would be provided along the project frontage at Taylor Road, and new water supply lines would be extended throughout the northern portion of the project site to connect with the PCWA's existing 24-inch water supply. The sewer easement would be extended approximately 10.5-feet to the project site boundary. All improvements would comply with applicable SPMUD Standard Specifications, and have been addressed throughout in the Draft EIR.

Response to Comment 6-9

In Chapter 10, Utilities and Service Systems, of the Draft EIR, a property line cleanout is shown in the Proposed Utility Improvements in Figure 10-8 on page 10-24. The property cleanout and related impacts are addressed throughout the Draft EIR.

Response to Comment 6-10

The proposed project does not include trees planted within the District's sewer easements, as shown in Figure 3-4 in Chapter 3, Project Description, of the Draft EIR.

Response to Comment 6-11

The applicant is aware of needing to schedule a meeting with the District staff in order to discuss the project. The comment does not address the adequacy of the Draft EIR.

Response to Comment 6-12

The comment is an attachment describing the annexation process and does not pertain to the adequacy of the Draft EIR.

3. REVISIONS TO THE DRAFT EIR TEXT

3

REVISIONS TO THE DRAFT EIR TEXT

3.1 INTRODUCTION

The Revisions to the Draft EIR Text chapter presents minor corrections, additions, and revisions made to the Draft EIR initiated by the Lead Agency (Placer County) based on comments received during the public review period by reviewing agencies, the public, and/or consultants.

The changes represent minor clarifications/amplifications of the analysis contained in the Draft EIR and do not constitute significant new information that, in accordance with CEQA Guidelines, Section 15088.5, would trigger the need to recirculate portions or all of the Draft EIR.

3.2 DESCRIPTION OF CHANGES

New text is double underlined and deleted text is ~~struck through~~. Text changes are presented in the page order in which they appear in the Draft EIR.

1 INTRODUCTION

The discussion on page 1-7 in Chapter 1, Introduction, of the Draft EIR is hereby revised as follows:

- *Hazards and Hazardous Materials (Items VIII-1 and -4 through -7):* Although a limited amount of potentially hazardous materials could be used on-site during construction and operations, regulations governing the use of such materials and amount anticipated to be used on site would ensure the routine handling, transport, use, or disposal of such materials would not create a significant hazard to the public or the environment, including through upset or accident conditions. Thus, a *less-than-significant* impact associated with such would occur. It should be noted that the potential for soil contamination related to historical agricultural activities conducted on the project site is addressed in detail in the Hazards and Hazardous Materials chapter of this EIR. As discussed in the chapter, a Removal Action Workplan has been prepared, which would require the necessary cleanup of the site, including removal of approximately 1,400 cubic yards of soil contaminated with metals from past use of the property from four distinct areas of the project site to ensure the site is safe for future occupants of the proposed school. The project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip, and is not in an area subject to a substantial risk due to wildland fires. Thus, *no impact* and/or a *less-than-significant* impact related to hazards associated with such would occur.

The above changes are for clarification purposes and do not alter the analysis or conclusions within the Draft EIR.

2 EXECUTIVE SUMMARY

The following text on page 2-1 in Chapter 2, Executive Summary, of the Draft EIR is hereby revised as follows.

Under the California Environmental Quality Act (CEQA), a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the existing physical conditions within the area affected by the project, including land, air, water, mineral, flora, fauna, ambient noise, and objects of historic or aesthetic significance. Mitigation measures must be implemented as part of the proposed project to reduce potential adverse impacts to a less-than-significant level. With regards to remediation of contaminated soils, all related mitigation measures would be implemented to ensure impacts related to the environment and surrounding area are minimized. Such mitigation measures are found in the following chapters of this EIR, as well as in the Initial Study for the proposed project (Appendix C): Introduction (Initial Study mitigation measures for Geology and Soils and Hydrology and Water Quality); Biological Resources; Cultural Resources; Hazards and Hazardous Materials; Noise; Transportation and Circulation; and Cumulative Impacts and Other CEQA Sections. Where an impact identified in the EIR remains significant after implementation of all feasible mitigation measures, the impact is determined to be significant and unavoidable.

The above change is for clarification purposes and do not alter the analysis or conclusions within the Draft EIR.

For clarification purposes, Table 2-1 in Chapter 2, Executive Summary, of the Draft EIR is hereby revised to reflect revisions made to mitigation measures as part of this Final EIR in the relevant chapters, as presented throughout this chapter. Rather than include the entirety of Table 2-1 with revisions shown where appropriate, only the impacts for which mitigation has been revised or added are presented at the end of this chapter. It should be noted that the mitigation measures added from the Initial Study are not new mitigation measures, but were unintentionally omitted from Table 2-1 within the Draft EIR. The revisions to the Executive Summary table are for clarification purposes only and do not change the conclusions of the Draft EIR.

3 PROJECT DESCRIPTION

The following text on page 3-17 in Chapter 3, Project Description, of the Draft EIR is revised as follows:

The proposed project is planned to be phased as follows:

- Abatement of the buildings for asbestos & lead based paint;
- Demolitions;
- Soil remediation pursuant to the Removal Action Workplan; and
- School Construction: Buildings A, B and E, primary parking lot, and ballfield.

The potential for soil contamination related to historical agricultural activities conducted on the project site is addressed in detail in the Hazards and Hazardous Materials chapter of this EIR. As discussed in the chapter, a Removal Action Workplan has been prepared, which would require the necessary cleanup of the site, including removal of approximately 1,400 cubic yards of soil contaminated with metals from past use of the property from four distinct areas of the project site to ensure the site is safe for future occupants of the proposed school.

The above changes are for clarification purposes and do not alter the analysis or conclusions within the Draft EIR.

5 BIOLOGICAL RESOURCES

Mitigation Measures 5-2(a) and (b) on page 5-42 in Chapter 5 of the Draft EIR are hereby revised as follows:

5-2(a) A worker education and awareness program shall be provided to all on-site personnel by a qualified biologist prior to the commencement of any construction activity including materials staging and ground-disturbing activities. The biologist shall explain to construction workers how best to avoid impacts to western pond turtle and shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Handouts, illustrations, photographs, and project mapping showing areas where minimization and avoidance measures would occur may be included as part of the education program. The crew members shall sign a sign-in sheet documenting that they received the training. The completed sign-in sheet shall be submitted to the Placer County Community Development Resource Agency and the California Department of Fish and Wildlife, upon request.

5-2(b) A qualified biologist shall conduct a pre-construction survey within three days prior to vegetation removal, pond draining, and initial grading activities. During the pre-construction survey, the biologist will locate suitable relocation sites based on suitable aquatic and upland habitat within the project site. All vegetation removal, pond draining, and initial grading activities associated with construction and maintenance activities shall be conducted under the supervision of a qualified biologist. If any western pond turtles are detected in the vicinity of the project footprint, the biological monitor shall relocate any western pond turtles found within the construction footprint to suitable habitat away from the construction zone, but within the project site. A letter report documenting the biological monitoring shall be submitted to the Placer County Community Development Resource Agency within 14 days following the final monitoring event.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-2(a) and (b) may be replaced with the PCCP's mitigation fees and

conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

The above changes are for clarification only and do not alter the conclusions or analysis of the Draft EIR.

Mitigation Measures 5-4(a) and (b) on pages 5-44 and 5-45 in Chapter 5 of the Draft EIR are hereby revised as follows:

- 5-4(a) *Prior to initiation of ground-disturbing activities, including activities associated with the off-site signalization improvement at the Taylor Road/Penryn Road intersection, if construction is expected to occur during the raptor nesting season (February 15 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal. The pre-construction survey shall be conducted within ~~14~~ three days prior to commencement of ground-disturbing activities. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required. If construction does not commence within ~~14~~ three days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required.*
- 5-4(b) *If any active nests are located within the study area, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically between 100 feet and 250 feet for migratory bird nests and between 250 feet and 500 feet for a raptor nest. If active nests are found within the project footprint, a qualified biologist shall monitor nests ~~weekly during~~ daily for a minimum of five days to ensure that construction activities are not disturbing the nest. to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest immediately following a construction noise or vibration, then the biologist shall increase the exclusionary buffer such that activities are far enough from the nest to stop this agitated behavior. The biologist shall subsequently monitor the nest for an additional five days to ensure that construction activities are not disturbing the nest. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with CDFW.*

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own

State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-4(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

The above changes are for clarification only and do not alter the conclusions or analysis of the Draft EIR.

The following text on page 5-49 in Chapter 5 of the Draft EIR is revised as follows:

5-7 Have a substantial adverse effect, either directly or through habitat modifications, on ~~pallid~~ special-status bats. Based on the analysis below and with implementation of mitigation, the impact is *less than significant*.

As discussed previously, roost sites for pallid bat typically include caves, crevices in rocky outcrops and cliffs, mines, trees, and various manmade structures (e.g., bridges, barns, porches), and generally have unobstructed entrances/exits. In addition, roosts are often high above the ground, warm, and inaccessible to terrestrial predators. Within the proposed project site, trees and structures within the annual grassland (20.69 acres), valley foothill riparian (6.74 acres), and interior live oak (10.56 acres) provide roosting habitat for the species. The structures would be demolished and some of the trees would be removed. As shown in Figure 5-3, the proposed project would impact approximately 10.25 acres of annual grassland, 0.42-acre of valley foothill riparian, and 0.51-acre of interior live oak. Based on the above, pallid bat has the potential to occur within the proposed project site. In addition, pallid bat could occur within trees that may require removal as part of the off-site Taylor Road/Penryn Road signalization improvement.

With respect to Townsend's big-eared bat, the Biological Resources Study Report for the project site determined that the site does not provide roosting habitat for this species. However, at least one occurrence of Townsend's big-eared bat, a CDFW Species of Special Concern, is located within five miles of the project site. Out of an abundance of caution, structures shall be surveyed prior to demolition to verify presence/absence of this species.

Therefore, the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on ~~pallid~~ special-status bats. Thus, a ***significant*** impact could occur.

The above changes are for clarification purposes and do not alter the analysis or conclusions within the Draft EIR.

Mitigation Measure 5-7(a) on page 5-49 in Chapter 5 of the Draft EIR is hereby revised as follows:

- 5-7(a) *Prior to the removal of suitable trees (larger than 24 inches in diameter at breast height [DBH]) or demolition of existing buildings, a qualified biologist shall conduct a pre-construction survey for special-status bats within ~~14~~three days prior to the start of their removal. If special-status bats are not observed roosting, then a letter report documenting the results of the survey shall be provided to the applicant for their records and submitted to the Placer County Community Development Resource Agency, and additional measures are not required. If tree removal or building demolition does not commence within ~~14~~three days of the pre-construction survey, or halts for more than 14 days, a new survey shall be required.*

The above changes are for clarification only and do not alter the conclusions or analysis of the Draft EIR.

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
5. Biological Measures			
5-2 Have a substantial adverse effect, either directly or through habitat modifications, on western pond turtle.	S	<p>5-2(a) <i>A worker education and awareness program shall be provided to all on-site personnel by a qualified biologist prior to the commencement of any construction activity including materials staging and ground-disturbing activities. The biologist shall explain to construction workers how best to avoid impacts to western pond turtle and shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Handouts, illustrations, photographs, and project mapping showing areas where minimization and avoidance measures would occur may be included as part of the education program. The crew members shall sign a sign-in sheet documenting that they received the training. The completed sign-in sheet shall be submitted to the Placer County Community Development Resource Agency and the California Department of Fish and Wildlife, upon request.</i></p> <p>5-2(b) <i><u>A qualified biologist shall conduct a pre-construction survey within three days prior to vegetation removal, pond draining, and initial grading activities. During the pre-construction survey, the biologist will locate suitable relocation sites based on suitable aquatic and upland habitat within the project site. All vegetation removal, pond draining, and initial grading activities associated with construction and maintenance activities shall be</u></i></p>	LS

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p><i>conducted under the supervision of a qualified biologist. If any western pond turtles are detected in the vicinity of the project footprint, the biological monitor shall relocate any western pond turtles found within the construction footprint to suitable habitat away from the construction zone, but within the project site. A letter report documenting the biological monitoring shall be submitted to the Placer County Community Development Resource Agency within 14 days following the final monitoring event.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-2(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i></p>	

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p>5-4 Have a substantial adverse effect, either directly or through habitat modifications, on other special-status birds or birds protected under the MBTA.</p>	<p>S</p>	<p>5-4(a) <i>Prior to initiation of ground-disturbing activities, including activities associated with the off-site signalization improvement at the Taylor Road/Penryn Road intersection, if construction is expected to occur during the raptor nesting season (February 15 to August 31), a qualified biologist shall conduct a preconstruction survey prior to vegetation removal. The pre-construction survey shall be conducted within 14 <u>three</u> days prior to commencement of ground-disturbing activities. If the pre-construction survey does not show evidence of active nests, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required. If construction does not commence within 14 <u>three</u> days of the pre-construction survey, or halts for more than 14 days, an additional pre-construction survey shall be required.</i></p> <p>5-4(b) <i>If any active nests are located within the study area, an appropriate buffer zone shall be established around the nests, as determined by the project biologist. The biologist shall mark the buffer zone with construction tape or pin flags and maintain the buffer zone until the end of breeding season or the young have successfully fledged. Buffer zones are typically between 100 feet and 250 feet for migratory bird nests and between 250 feet and 500 feet for a raptor nest. If active nests are found within the project footprint, a qualified biologist shall</i></p>	<p>LS</p>

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p><i><u>monitor nests weekly during daily for a minimum of five days to ensure that construction activities are not disturbing the nest. to evaluate potential nesting disturbance by construction activities. Guidance from CDFW shall be required if establishing the typical buffer zone is impractical. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest immediately following a construction noise or vibration, then the biologist shall increase the exclusionary buffer such that activities are far enough from the nest to stop this agitated behavior. The biologist shall subsequently monitor the nest for an additional five days to ensure that construction activities are not disturbing the nest. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with CDFW.</u></i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-4(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set</i></p>	

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<i>forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i>	
5-7 Have a substantial adverse effect, either directly or through habitat modifications, on pallid <u>special-status bats</u> . Based on the analysis below and with implementation of mitigation, the impact is less than significant.	S	5-7(a) Prior to the removal of suitable trees (larger than 24 inches in diameter at breast height [DBH]) or demolition of existing buildings, a qualified biologist shall conduct a pre-construction survey for special-status bats within 14 <u>three</u> days prior to the start of their removal. If special-status bats are not observed roosting, then a letter report documenting the results of the survey shall be provided to the applicant for their records and submitted to the Placer County Community Development Resource Agency, and additional measures are not required. If tree removal <u>or building demolition</u> does not commence within 14 <u>three</u> days of the pre-construction survey, or halts for more than 14 days, a new survey shall be required.	LS
Initial Study			
VI-8 <u>Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral</u>	<u>S</u>	<u>VI.6: Implement MM VI.3.</u>	<u>LS</u>

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
<p><u>spreading, subsidence, liquefaction, or collapse.</u></p> <p>VI-9 Be located on expansive soils, as defined in Chapter 18 of the California Building Code, creating substantial risks to life or property.</p>			
<p>IX-3 Substantially alter the existing drainage pattern of the site or area?</p> <p>IX-4 Increase the rate or amount of surface runoff?</p>	S	<p><i>IX.1: As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water</i></p>	LS

**TABLE 2-1
 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Level of Significance prior to Mitigation	Mitigation Measures	Level of Significance after Mitigation
		<p><i>Management Manual that are in effect at the time of Improvement Plan submittal.</i></p> <p><i>IX.2: This project is subject to the one-time payment of drainage improvement and flood control fees for the <u>Secret Ravine Watershed</u>, pursuant to the "Dry Creek Watershed Drainage Improvement Ordinance" (Ref: Chapter 15, Article 15.32, Placer County Code.) The current estimated development fee is \$1,950-\$2,179 per gross parcel acreage, payable to the Engineering and Surveying Division prior to Building Permit issuance. The fees to be paid shall be based on the fee program in effect at the time that the application is deemed complete.</i></p> <p><i>IX.3: This project is subject to payment of annual drainage improvement and flood control fees for the <u>Secret Ravine Watershed</u>, pursuant to the "Dry Creek Watershed Drainage Improvement Ordinance" (Ref: Chapter 15, Article 15.32, Placer County Code). Prior to Building Permit issuance, the applicant shall cause the subject property to become a participant in the existing Dry Creek Secret Ravine Watershed County Service Area for purposes of collecting these annual assessments. The current estimated annual fee is \$2,179-\$344 per acre. (MM) (ESD) (<u>DPWF</u>)</i></p>	

4. MITIGATION MONITORING AND REPORTING PROGRAM

4

MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) requires all State and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the United Auburn Indian Community School project (proposed project). The intent of the MMRP is to ensure implementation of the mitigation measures identified within the Environmental Impact Report (EIR) for this project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMRP shall be funded by the applicant.

4.2 COMPLIANCE CHECKLIST

The MMRP contained herein is intended to satisfy the requirements of CEQA as they relate to the EIR and the Initial Study prepared for the proposed project (see Appendix C). This MMRP is intended to be used by Placer County staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMRP were developed in the EIR and Initial Study.

The EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA Guidelines, Section 15370, as a measure that:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

The intent of the MMRP is to ensure the implementation of adopted mitigation measures. The MMRP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by Placer County. The table attached to this report identifies the mitigation measure, the monitoring action for the mitigation measure, the responsible party for the monitoring action, and timing of the monitoring action. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMRP. The County will be responsible for monitoring compliance.

4.3 MITIGATION MONITORING AND REPORTING PROGRAM

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
Chapter 5 – Biological Resources					
5-2	Have a substantial adverse effect, either directly or through habitat modifications, on western pond turtle.	<p>5-2(a) <i>A worker education and awareness program shall be provided to all on-site personnel by a qualified biologist prior to the commencement of any construction activity including materials staging and ground-disturbing activities. The biologist shall explain to construction workers how best to avoid impacts to western pond turtle and shall include topics on species identification, life history, descriptions, and habitat requirements during various life stages. Handouts, illustrations, photographs, and project mapping showing areas where minimization and avoidance measures would occur may be included as part of the education program. The crew members shall sign a sign-in sheet documenting that they received the training. The completed sign-in sheet shall be submitted to the Placer County Community Development Resource Agency and the California Department of Fish and Wildlife, upon request.</i></p>	Placer County Community Development Resource Agency	Prior to commencement of any construction activity	
		<p>5-2(b) <i>A qualified biologist shall conduct a pre-construction survey within three days prior to vegetation removal, pond draining, and initial grading activities. During the pre-construction survey, the biologist will locate suitable relocation sites based on suitable aquatic and</i></p>	Placer County Community Development Resource Agency	Within three days prior to vegetation removal, pond draining, and initial grading activities	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>upland habitat within the project site. All vegetation removal, pond draining, and initial grading activities associated with construction and maintenance activities shall be conducted under the supervision of a qualified biologist. If any western pond turtles are detected in the vicinity of the project footprint, the biological monitor shall relocate any western pond turtles found within the construction footprint to suitable habitat away from the construction zone, but within the project site. A letter report documenting the biological monitoring shall be submitted to the Placer County Community Development Resource Agency within 14 days following the final monitoring event.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-2(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for</i></p>		<p>associated with construction and maintenance activities</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i>			
5-3	Have a substantial adverse effect, either directly or through habitat modifications, on burrowing owl.	<p>5-3(a) <i>Due to the low likelihood of burrowing owl occurrence, a single take avoidance survey shall be conducted between 14 days and 30 days prior to commencement of construction and/or maintenance activities, in accordance with Appendix D of the 2012 CDFW Staff Report on Burrowing Owl Mitigation. The survey area shall include an approximately 500-foot (150-meter) buffer around suitable grassland habitats, where access is permitted. If the results of the survey are negative, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional protective measures are not required.</i></p> <p>5-3(b) <i>If active burrows are observed within 500 feet of the project site, an impact assessment should be prepared and submitted to CDFW in accordance with the 2012 CDFW Staff Report on Burrowing Owl Mitigation. If project activities could result in impacts to nesting, occupied, and satellite burrows and/or burrowing owl habitat, the project applicant shall delay commencement of construction activities until a qualified biologist determines</i></p>	<p>Placer County Community Development Resource Agency</p> <p>Placer County Community Development Resource Agency</p> <p>CDFW (if construction could result in impacts to active</p>	<p>Between 14 and 30 days prior to commencement of construction and/or maintenance activities of any phase of the proposed project</p> <p>Prior to commencement of construction and/or maintenance activities of any phase of the proposed project if the pre-construction survey finds active</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>that the burrowing owls have fledged and the burrow is no longer occupied. If delay of construction activities is infeasible, the project applicant shall consult with CDFW and develop a detailed mitigation plan such that the habitat acreage, number of burrows, and burrowing owls impacted are replaced. The mitigation plan shall be based on the requirements set forth in Appendix A of the 2012 Staff Report. Construction shall not commence until CDFW has approved the mitigation plan.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-3(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by</i></p>	burrows)	burrows on or within 500 feet of the project site	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>between 100 feet and 250 feet for migratory bird nests and between 250 feet and 500 feet for a raptor nest. If active nests are found within the project footprint, a qualified biologist shall monitor nests daily for a minimum of five days to ensure that construction activities are not disturbing the nest. Should construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest immediately following a construction noise or vibration, then the biologist shall increase the exclusionary buffer such that activities are far enough from the nest to stop this agitated behavior. The biologist shall subsequently monitor the nest for an additional five days to ensure that construction activities are not disturbing the nest. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined by a qualified biologist in consultation with CDFW.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-4(a) and (b) may be replaced with</i></p>	<p>typical nest buffer zone)</p>		

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i>			
5-5	Have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawk.	5-5(a) <i>All tree removal activities shall occur outside of the nesting season (September 16 through February 28). Alternatively, prior to the commencement of ground-disturbing activities during the nesting season for Swainson's hawk (between March 1 and September 15), a qualified biologist shall conduct a minimum of one protocol-level pre-construction survey during the recommended survey periods for the nesting season that coincides with the commencement of construction activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. The biologist shall conduct surveys for nesting Swainson's hawk within 0.25-mile of the project site where legally permitted. The biologist shall use binoculars to visually determine whether Swainson's hawk nests occur within the 0.25-mile survey area if</i>	Placer County Community Development Resource Agency	Prior to the commencement of ground-disturbing activities during the nesting season for Swainson's hawk (between March 1 and September 15)	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>access is denied on adjacent properties. If active Swainson's hawk nests are not identified on or within 0.25-mile of the project site within the recommended survey periods, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency within 30 days following the final survey, and further avoidance and minimization measures for nesting habitat are not required.</i></p> <p>5-5(b) <i>If active Swainson's hawk nests are found within 0.25-mile of ground-disturbing activities, the biologist shall contact the Placer County Community Development Resource Agency and CDFW within one day following the preconstruction survey to report the findings. For the purposes of this avoidance and minimization requirement, construction activities are defined to include heavy equipment operation associated with construction (use of cranes or draglines, new rock crushing activities) or other project-related activities that could cause nest abandonment or forced fledging within 0.25-mile of a nest site between March 1 and September 15.</i></p> <p><i>If an active nest is present within 0.25-mile of construction areas, CDFW shall be consulted to establish an appropriate noise buffer,</i></p>	<p>Placer County Community Development Resource Agency</p> <p>CDFW</p>	<p>Within one day following the preconstruction survey if active Swainson's hawk nests are found</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>develop take avoidance measures, determine whether high visibility construction fencing should be erected around the buffer zone, and implement a monitoring and reporting program prior to any construction activities occurring within 0.25-mile of the nest. If the biologist determines that the construction activities are disturbing the nest, the biologist shall halt construction activities until CDFW is consulted. The construction activities shall not commence until CDFW determines that construction activities would not result in abandonment of the nest site. If the biologist determines that the nest has not been disturbed during construction activities within the buffer zone, a letter report summarizing the survey results should be submitted to the Placer County Community Development Resource Agency and CDFW within 30 days following the final monitoring event, and further avoidance and minimization measures for nesting habitat are not required.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-5(a) and (b) may be replaced with</i></p>			

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i>			
5-6	Have a substantial adverse effect, either directly or through habitat modifications, on American badger.	<p>5-6(a) <i>A qualified biologist shall conduct a preconstruction survey for American badger within 14 days prior to the start of ground disturbance. If American badgers or their burrows are not observed, a letter report documenting the results of the survey shall be provided to the Placer County Community Development Resource Agency, and additional measures are not required.</i></p> <p>5-6(b) <i>If American badgers or their dens are found, additional avoidance measures shall be required. Specifically, American badger dens determined to be occupied during the breeding season (February 15 through June 30) shall be flagged, and ground disturbing activities avoided, within 100 feet to protect adults and nursing young. Buffers may be modified by the qualified biologist, provided the badgers are protected, and shall not be removed until the</i></p>	<p>Placer County Community Development Resource Agency</p> <p>Placer County Community Development Resource Agency</p>	<p>Within 14 days prior to the start of ground disturbance</p> <p>Prior to and during construction activities if American badgers or their dens are found</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>qualified biologist has determined that the den is no longer in use. If the den is occupied during the non-maternity period and avoidance is not feasible, badgers shall be relocated by first incrementally blocking the den over a three-day period, followed by slowly excavating the den before or after the rearing season (February 15 through June 30). This slow excavation shall be performed either by hand or with mechanized equipment under the direct supervision of a qualified biologist; no more than four inches depth shall be excavated at a time. Any passive relocation of American badgers shall occur only under the direction of a qualified biologist.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-6(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for</i></p>			

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i>			
5-7	Have a substantial adverse effect, either directly or through habitat modifications, on special-status bats.	<p>5-7(a) <i>Prior to the removal of suitable trees (larger than 24 inches in diameter at breast height [DBH]) or demolition of existing buildings, a qualified biologist shall conduct a pre-construction survey for special-status bats within three days prior to the start of their removal. If special-status bats are not observed roosting, then a letter report documenting the results of the survey shall be provided to the applicant for their records and submitted to the Placer County Community Development Resource Agency, and additional measures are not required. If tree removal or building demolition does not commence within three days of the pre-construction survey, or halts for more than 14 days, a new survey shall be required.</i></p> <p>5-7(b) <i>If bats are found in trees or structures proposed for removal, a minimum 10-foot avoidance buffer shall be established around the roost/maternity until the roost is not occupied. The buffer shall be established under the supervision of a qualified biologist. High-visibility construction fencing shall be installed around the buffer and shall remain in place until the tree or structure is not</i></p>	<p>Placer County Community Development Resource Agency</p> <p>Placer County Community Development Resource Agency CDFW</p>	<p>Within three days prior to the removal of suitable trees (larger than 24 inches DBH) or demolition of existing buildings</p> <p>Prior to and during construction activities if bats are found in trees or structures to be removed</p>	

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		<p><i>occupied by bats. The trees or structures shall not be removed until the biologist has determined that the roost is not occupied by the bats.</i></p> <p><i>If exclusion of roosting bats is necessary, exclusion shall be conducted as recommended by the qualified biologist. If a roosting colony of bats is found, and exclusion is necessary, exclusion shall be conducted as recommended by the qualified biologist in coordination with CDFW. Methods may include acoustic monitoring, evening emergence surveys, and the utilization of two-step tree removal supervised by the qualified biologist. Two-step tree removal involves removal of all branches that do not provide roosting habitat on the first day, and then the next day cutting down the remaining portion of the tree. Building exclusion methods may include such techniques as installation of passive one-way doors, or the installation of netting when the bats are not present to prevent their reoccupation. Once the bats have been excluded, tree or building removal may occur. A letter report summarizing the survey results should be submitted to the Placer County Community Development Resources Agency within 30 days following the final monitoring event.</i></p> <p><i>In the event the Placer County Conservation</i></p>			

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		<i>Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-7(a) and (b) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i>			
5-9	Have a substantial adverse effect on the environment by converting oak woodlands, or conflict with any local policies or ordinances that protect biological resources, including oak woodland resources.	<i>5-9(a) Prior to any removal of protected trees (equal to, or greater than, six inches DBH or 10 inches DBH aggregate for multi-trunked trees), the project applicant shall obtain a tree removal permit from Placer County. In conjunction with submittal of a tree removal permit application, the applicant shall submit a site plan showing all protected trees proposed for removal. In accordance with Chapter 12.16.080 of the Placer County Municipal Code, the applicant shall comply with any permit conditions required by the Planning Services Division, which shall</i>	Placer County Community Development Resource Agency	Prior to any removal of protected trees	

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		<p><i>include one (or a combination) of the following requirements: 1:1 tree replacement using five-gallon size trees or greater, implementation of a revegetation plan, or payment of in-lieu fees.</i></p> <p><i>If the applicant chooses to implement a revegetation plan, the plan shall identify the seed or seedling source of the trees to be propagated, the location of the plots, the methods to be used to ensure success of the revegetation program (e.g., irrigation), an annual reporting requirement, and the criteria to be used to measure the success of the plan. A revegetation program shall not be considered complete until the trees to be propagated have reached one-half inch in diameter or the revegetation plan demonstrates the need for alternative success criteria and achieves mitigation on an inch for inch basis as approved by the Community Development Resource Agency.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then Mitigation Measure 5-9(a) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the</i></p>	Placer County Community Development Resource Agency Planning Services Division	Prior to Improvement Plan approval	

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		<p><i>PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i></p> <p>5-9(b) <i>Prior to Improvement Plan approval, the plans shall include a list of tree protection methods, for review and approval by the Planning Services Division. The list of tree protection methods shall be implemented during construction of the project. The list of tree protection methods shall include, but not limited to, the following:</i></p> <ul style="list-style-type: none"> • <i>The applicant shall install a four-foot tall, brightly colored (yellow or orange), synthetic mesh material fence around all trees to be preserved that are greater than six inches DBH (or 10 inches DBH aggregate for multi-trunked trees). The fencing shall delineate an area that is at least the radius of which is equal to the largest radius of the protected tree's drip line plus one foot. The fence shall be installed prior to any site preparation or construction equipment being moved onsite or any site preparation or construction activities taking place.</i> 	Development Review Committee Representative		

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		<p><i>Development of this site, including grading, shall not be allowed until this condition is satisfied. Any encroachment within the areas listed above, including within driplines of trees to be saved, must first be approved by a designated representative of the Development Review Committee (DRC). Grading, clearing, or storage of equipment or machinery may not occur until a representative of the DRC has inspected and approved all temporary construction fencing. Trees shall be preserved where feasible. This may include the use of retaining walls, planter islands, or other techniques commonly associated with tree preservation. The Improvement Plans shall indicate the location of the fencing and include a note describing the fencing requirements consistent with this mitigation measure.</i></p> <ul style="list-style-type: none"> • <i>The project applicant shall implement the following guidelines before and during grading and construction for protection of all trees to be preserved:</i> <ul style="list-style-type: none"> ○ <i>Plans and specifications shall clearly state protection procedures for trees on the project site. The specifications shall also include a provision for remedies if</i> 			

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		<p><i>trees are damaged;</i></p> <ul style="list-style-type: none"> ○ <i>Before construction commences, those trees within 25 feet of construction sites shall be pruned by an ASI Certified Arborist and the soil aerated and fertilized, as appropriate for the specific species;</i> ○ <i>Vehicles, construction equipment, mobile offices, or materials shall not be parked, stored, or operated within the driplines of trees to be preserved;</i> ○ <i>Cuts and fills around trees shall be avoided where feasible;</i> ○ <i>Soil surface removal greater than one foot shall not occur within the driplines of trees to be preserved. Cuts shall not occur within five feet of their trunks;</i> ○ <i>Earthen fill greater than one foot deep shall not be placed within the driplines of trees to be preserved, and fill shall not be placed within five feet of their trunks;</i> ○ <i>Underground utility line trenching shall not be placed within the driplines of trees to be preserved where feasible without first obtaining approval from a</i> 			

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		<p><i>designated representative of the DRC. If it is necessary to install underground utilities within the driplines of trees, boring or drilling rather than trenching shall be used;</i></p> <ul style="list-style-type: none"> ○ <i>Paving shall not be placed in the vicinity of trees to be preserved (at a minimum, within the dripline of any tree) without first obtaining approval from a designated representative of the DRC; and</i> ○ <i>Irrigation lines or sprinklers shall not be allowed within the dripline of native trees.</i> <ul style="list-style-type: none"> ● <i>If any of the on-site protected trees are heavily damaged during construction activities associated with the proposed project, the project applicant shall pay an in-lieu fee for the damaged tree(s) in accordance with Section 12.16.080 of the Placer County Municipal Code. Payment of such fees shall be ensured as a standard condition of approval by the Planning Services Division.</i> 			
		<p>5-9(c) <u>Taylor Road/Penryn Road Signal.</u> <i>Prior to Improvement Plan approval, the project applicant shall submit an arborist report for the off-site Taylor Road/Penryn Road intersection improvement area. The arborist</i></p>	<p>Placer County Community Development Resource Agency Planning</p>	<p>Prior to Improvement Plan approval</p>	

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		<i>report shall identify the species, size, and condition of all trees within the improvement area and shall note which trees are proposed for removal. In addition, the arborist report shall include a list of recommended tree protection measures for trees to be retained, which are generally consistent with those outlined in Mitigation Measure 5-9(b). All trees which are deemed to be protected by the County's Tree Preservation Ordinance shall be subject to the requirements of Mitigation Measure 5-9(a).</i>	Services Division		
5-10	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by CDFW, the USFWS, the USACE, or the NMFS, and/or have a substantial adverse effect on federal or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or as defined by state statute,	<p><i>5-10(a) High visibility and silt fencing shall be erected at the edge of construction/maintenance footprint if work is anticipated to occur within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance. A biological monitor shall be present during the fence installation and during any initial grading or vegetation clearing activities within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance.</i></p> <p><i>5-10(b) Prior to Improvement Plan approval for the project, a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE "no-net-loss" policy. To the extent feasible, however, the project shall be</i></p>	<p>Placer County Community Development Resource Agency</p> <p>Placer County Community Development Resource Agency</p> <p>USACE</p>	<p>Prior to initiation of construction work within 50 feet of potentially jurisdictional features and riparian areas which are proposed for avoidance</p> <p>Prior to Improvement Plan approval</p>	

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		<p><i>Agency.</i></p> <p><i>In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project or prior to the project's own State and federal permits being obtained for effects associated with listed species and their habitats, waters of the State, and waters of the U.S., then Mitigation Measures 5-10(a), 5-10(b), and 5-10(c) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.</i></p> <p><i>5-10(d) Taylor Road/Penryn Road Signal. Prior to Improvement Plan approval, the project applicant shall submit a wetland delineation for the off-site Taylor Road/Penryn Road intersection improvement area that has been verified by the US Army Corps of Engineers. If USACE verifies that jurisdictional features are located within the signalization improvement area, and the improvements would result in</i></p>	<p>Placer County Community Development Resource Agency</p> <p>USACE</p> <p>RWQCB</p>	<p>Prior to Improvement Plan approval</p>	

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		<p><i>discharge of fill within the feature(s), then a Section 404 permit for fill of jurisdictional wetlands shall be acquired, and mitigation for impacts to jurisdictional waters that cannot be avoided shall conform with the USACE “no-net-loss” policy. To the extent feasible, however, the signalization project shall be designed to avoid and minimize adverse effects to waters of the U.S. or jurisdictional waters of the State of California within the project area.</i></p> <p><i>If a Section 404 permit is obtained, the applicant must also obtain a water quality certification from the RWQCB under Section 401 of the Clean Water Act (CWA). Written verification of the Section 404 permit and the Section 401 water quality certification shall be submitted to the Placer County Community Development Resource Agency.</i></p>			
Chapter 6 – Cultural Resources					
6-2	Cause a substantial adverse change in the significance of a unique archeological resource pursuant to CEQA Guidelines, Section 15064.5	<p><i>6-2 If cultural resources are discovered during construction, then all work must halt within a 100-foot radius of the discovery. A qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards for prehistoric and historic archaeologists, will be called to evaluate the significance of the find. Work cannot continue at the discovery site until the archaeologist</i></p>	<p>Placer County Community Development Resource Agency</p> <p>UAIC</p>	<p>Language of the measure shall be included on future grading plans, utility plans, and improvement drawings.</p> <p>Implementation</p>	

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		<i>conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially significant or eligible for listing on the National Register of Historic Places/State Register. If a potentially-eligible resource is encountered, then the archaeologist, Placer County, and UAIC will arrange for either 1) total avoidance of the resource, if possible; 2) test excavations or total data recovery; or 3) other alternative forms of mitigation. The determination shall be formally documented in writing and submitted to the Placer County as verification that the provisions in CEQA for managing unanticipated discoveries have been met.</i>		shall occur during construction activities	
6-4	Disturb any human remains, including those interred outside of formal cemeteries.	6-4 <i>In the event that evidence of human remains is discovered, construction activities within 100 feet of the discovery will be halted or diverted and the requirements of Mitigation Measure 6-2(a) will be implemented. In addition, the provisions of Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code will be implemented. When human remains are discovered, State law requires that the discovery be reported to the County Coroner (Section 7050.5 of the Health and Safety Code). If the Coroner determines the remains are Native American, the Coroner notifies the Native American Heritage Commission, which</i>	Placer County Community Development Resource Agency County Coroner NAHC	Language of the measure shall be included on future grading plans, utility plans, and improvement drawings. Implementation shall occur during construction activities	

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		<i>then designates a Native American Most Likely Descendant (MLD) for the project (Pub. Res. Code § 5097.98). The designated MLD then has 48 hours to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Pub. Res. Code § 5097.94). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Pub. Res. Code § 5097.98).</i>			
6-5	Have the potential to cause a physical change, which would affect unique ethnic cultural values, restrict existing religious or sacred uses within the potential impact area, or cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code, Section 21074.	6-5 <i>Implement Mitigation Measures 6-2 and 6-4.</i>	See Mitigation Measures 6-2 and 6-4	See Mitigation Measures 6-2 and 6-4	

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		<p><i>removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with California Air Resources Board recommendations and OSHA requirements. If asbestos is found, all construction activities shall comply with all requirements and regulations promulgated through the PCAPD Asbestos Dust Mitigation Plan. The demolition contractor shall be informed that all paint on the buildings shall be considered as containing lead and/or asbestos. The contractor shall follow all work practice standards set forth in the Asbestos National Emission Standards for Hazardous Air Pollutants (Asbestos NESHAP, 40 CFR, Part 61, Subpart M) regulations, as well as Section V, Chapter 3 of the OSHA Technical Manual. Work practice standards generally include appropriate precautions to protect construction workers and the surrounding community, and appropriate disposal methods for construction waste containing lead paint or asbestos in accordance with federal, State, and local regulations subject to approval by the County Engineer.</i></p>			
		<p>7-1(c) <i>Prior to initiation of construction for the UAIC School Project and with an Early Grading Permit from ESD, the project applicant shall provide proof to the County that the arsenic, lead, and chlordanes</i></p>	<p>Placer County Environmental Health Department</p>	<p>Prior to initiation of construction for the UAIC School Project and with an Early Grading</p>	

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		<p><i>contaminated soils on the site have been remediated to the site cleanup goals identified in Table 1 of the DTSC-approved Removal Action Work Plan (RAW), to the satisfaction of the DTSC. Preliminary remedial excavation areas are shown in Figures 7A, 7B, and 7C of the RAW. All construction personnel carrying out the remediation work shall implement the health and safety protocols set forth in the Site Specific Health and Safety Plan (HSP) included as Appendix B to the RAW. Additional RAW requirements are summarized as follows:</i></p> <ul style="list-style-type: none"> • <i><u>Early Grading Permit:</u> Prior to issuance of an Early Grading Permit to allow for the remediation work, the applicant must submit Improvement Plans and any related documents as required by these conditions of approval to the Engineering and Surveying Division (ESD) for review. The review for the initial submittal of the Improvement Plans must be completed by Development Review Committee (DRC) and satisfactorily address issues relating to dust control, tree removal, wetlands, protective fencing, grading, drainage, and erosion control.</i> 	<p>DTSC Development Review Committee Placer County Community Development Resource Agency</p>	Permit from ESD	

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		<p><i>Upon DRC determination that an Early Grading Permit may be issued, the applicant shall prepare a separate Rough Grading Plan and submit it to ESD for review and approval. Separate plan check, inspection and winterization fees shall be required and shall be based on the engineer's estimate. If Design/Site Review process and/or DRC review is required as a condition of approval for this project, said review shall be completed prior to the submittal of the Early Grading Permit.</i></p> <ul style="list-style-type: none"> • <u>Site Security:</u> <i>The Site shall be fenced and gated with a lock to prevent unauthorized access during the remediation operations.</i> • <u>Risk Reduction Measures:</u> <ul style="list-style-type: none"> o <i>Dust and Erosion Control: In addition to implementing dust control measures required by the Air District, the contractor shall prepare and implement a detailed Dust Control Plan for all phases of construction that contact contaminated soil. Dust control best management practices are listed in the RAW.</i> o <i>Air and Meteorological Monitoring: Air monitoring for particulate matter at the site shall</i> 			

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		<p><i>be performed to document worker exposures and off-site migration of dust, during soil removal activities.</i></p> <ul style="list-style-type: none"> <i>o Perimeter Dust Monitoring: Perimeter air monitoring shall be conducted at the site to document the effectiveness of dust control measures. Prior to beginning soil removal activities, a windsock or anemometer shall be used to monitor the wind direction at the site and to help determine the location of monitors along the fence lines. Fence line monitoring shall be conducted at three locations: one upwind and two downwind at the site. Each dust monitor shall be positioned within the breathing zone at approximately five feet above the ground level. Dust monitoring shall be conducted daily during remedial excavation activities, and whenever personal or fence line air monitoring is performed. The following shall be required: <ul style="list-style-type: none"> <i>▪ Real time monitoring of total dust (<10 μm diameter) shall be conducted daily throughout</i> </i> 			

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		<p><i>the duration of the removal action during activities that may significantly disturb contaminants of concern impacted soil. The monitoring shall be performed using three DataRAM PDR-1000 particulate monitors. The meters log the detected airborne dust concentrations.</i></p> <ul style="list-style-type: none"> ▪ <i>The particulate meters shall be monitored by the field engineer or geologist to evaluate if excessive dust is migrating off-site. Each time the meters are checked, the differences between the average upwind dust concentration and the average downwind concentration shall be calculated.</i> ▪ <i>The DTSC-recommended work zone action level is five milligrams per cubic meter (mg/m³). That concentration is half the eight-hour threshold limit value of 10 mg/m³ for total</i> 			

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		<p><i>particulates established by the American Conference of Governmental Industrial Hygienists for occupational exposure. For perimeter dust monitoring, the calculated difference between the upwind and downwind meter shall be compared to the DTSC-recommended action level of 0.05 mg/m³. Trigger levels for dust are established at one-half the action level. Exceedance of the trigger levels would require increased dust mitigation measures until the trigger levels can be achieved.</i></p> <ul style="list-style-type: none"> • <u>Transportation Procedures:</u> <ul style="list-style-type: none"> o <i>The RAW identifies Alternative 3 – Excavation and Off-Site Disposal – as the selected alternative. The following transportation procedures will be followed, based on guidelines contained in the Transportation Plan – Preparation Guidance for Site Remediation (Cal/EPA 1994).</i> <ul style="list-style-type: none"> ▪ <i>The soil will be</i> 			

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		<p><i>transported by a licensed transporter.</i></p> <ul style="list-style-type: none"> ▪ <i>Loaded trucks will exit the Site onto Taylor Road heading north, turn right onto Penryn Road heading south, and turn left onto Boyington Road to merge into westbound Interstate 80. Excavated soils from the Inn/Annex shall be transported to a Class I Landfill – preliminarily identified in the RAW as Kettleman Hill Landfill. All other excavated soils can be transported to a Class II Landfill – preliminarily identified in the RAW as the Ostrom Road Landfill in Wheatland.</i> ▪ <i>Prior to the start of transport operations, the transportation contractor’s Project Manager will contact an Emergency Response Contractor (ERC), who shall be responsible for contacting all appropriate outside agencies if notified of an</i> 			

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		<p><i>emergency by the driver.</i></p> <ul style="list-style-type: none"> ▪ <i>The selected transportation contractor will have an on-going training program for the truck drivers; such a program will be specifically required in the transportation contract.</i> • <u><i>Soil Removal Completion Report:</i></u> <ul style="list-style-type: none"> o <i>After completion of the remedial action, a Soil Removal Completion Report will be prepared and submitted to DTSC and Placer County Community Development Resources Agency. The report will document that the remedial action has been performed in accordance with this document and will include, at a minimum, the following elements:</i> <ul style="list-style-type: none"> ▪ <i>Summary of excavation activities (volume, extent, etc.);</i> ▪ <i>Procedures, location, and results (i.e., analytical reports) of the confirmation soil sampling;</i> ▪ <i>Documentation of off-Site transport and disposal of excavated soil (bills of</i> 			

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		<i>lading, waste manifests); and</i> <ul style="list-style-type: none"> ▪ <i>Health and safety and results of air monitoring.</i> 			
7-2	Emit hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school.	7-2 <i>Implement Mitigation Measure 7-1(c).</i>	See Mitigation Measure 7-1(c)	See Mitigation Measure 7-1(c)	
Chapter 8 – Noise					
8-2	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, due to operation of the proposed project.	8-2 <i>All speakers used during special events shall be located at least 270 feet from the nearest residential property line. Additionally, speakers used during special events shall be oriented away from the nearest residential property line. The orientation of the speakers shall be inspected by a designated operations manager for the UAIC school facilities. The language of this mitigation shall be included as a Condition of Approval for the requested Minor Use Permit.</i>	Placer County Community Development Resource Agency and Planning Services Division	During special events hosted at the project site	
8-3	Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.	8-3 <i>The following criteria shall be included in the grading plan submitted by the applicant for review and approval by the Engineering and Surveying Division prior to issuance of Improvement Plans:</i> <ul style="list-style-type: none"> • <i>Large construction equipment, such as large bulldozer and loaded trucks, shall be replaced with smaller equipment when the construction</i> 	Placer County Planning Services Division	Prior to issuance of grading permits	

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		<i>equipment is within 45 feet of an occupied residence.</i>			
8-4	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project during project construction.	<p>8-4 <i>The following criteria shall be included in the grading plan submitted by the applicant/developer for review and approval by the Department of Public Works and Facilities and Engineering and Surveying Division prior to issuance of Improvement Plans. Exceptions to allow expanded construction activities shall be reviewed on a case-by-case basis as determined by the Community Development Resource Agency Director and/or County Engineer.</i></p> <ul style="list-style-type: none"> • <i>Noise-generating construction activities (e.g. construction, alteration or repair activities), including truck traffic coming to and from the project site for any purpose, shall be limited to the hours outlined in Placer County Board of Supervisors Minute Order 90-08; specifically, a) Monday through Friday, 6:00 AM to 8:00 PM (during daylight savings); b) Monday through Friday, 7:00 AM to 8:00 PM (during standard time); and c) Saturdays, 8:00 AM to 6:00 PM.</i> • <i>Equipment and trucks used for project construction shall utilize the best available noise control techniques, such as improved mufflers, equipment</i> 	<p>Placer County Planning Services Division</p> <p>Community Development Resource Agency Director and/or County Engineer</p>	Prior to issuance of grading permits	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds. The implementation of best control techniques could result in a noise reduction of 10 dB.</i></p> <ul style="list-style-type: none"> • <i>Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10-dB. External jackets on the tools themselves shall be used, to achieve a reduction of 5 dB. Quieter procedures shall be used, such as drills rather than impact equipment.</i> • <i>Stationary noise sources shall be located as far from adjacent receptors as possible, and they will be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures. The use of temporary enclosures or barriers around stationary noise sources (e.g.,</i> 			

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>generators, compressors, pumps, etc.) would result in a noise reduction of up to 10 dB.</i>			
Chapter 9 – Transportation and Circulation					
9-1	Traffic related to construction activities.	<p><i>9-1 Prior to issuance of building permits, the project applicant shall prepare a Construction Traffic Management Plan (CTMP) to the satisfaction of the Placer County Department of Public Works and Facilities and the Engineering and Surveying Division. The plan shall include (but not be limited to) items such as:</i></p> <ul style="list-style-type: none"> • <i>Guidance on the number and size of trucks per day entering and leaving the project site;</i> • <i>Identification of arrival/departure times that would minimize traffic impacts;</i> • <i>Approved truck circulation patterns, including patterns identified in the Transportation Procedures of the Removal Action Work Plan (see also Mitigation Measure 7-2(c) of this EIR);</i> • <i>Locations of staging areas;</i> • <i>Methods for partial/complete street closures (e.g., timing, signage, location and duration restrictions);</i> • <i>Criteria for use of flaggers and other traffic controls;</i> 	<p>Placer County Department of Public Works and Facilities</p> <p>Placer County Engineering and Surveying Division</p>	Prior to issuance of building permits	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<ul style="list-style-type: none"> • <i>Monitoring for roadbed damage and timing for completing repairs; and</i> • <i>Preservation of emergency vehicle access.</i> 			
9-2	Study intersections under Existing Plus Project Conditions.	<p>9-2 <i>The Improvement Plans shall show signalization of the Taylor Road/Penryn Road intersection. Traffic striping shall be done by the developer's contractor. The removal of existing striping and other pavement markings shall be completed by the developer's contractor.</i></p> <p><i>Additional widening may be required to accommodate auxiliary lanes, intersection geometrics, bike lanes, water quality post construction Best Management Practices (BMPs), or conformance to existing improvements. The roadway structural section shall be designed for a Traffic Index of 8.5, but said section shall not be less than 3 inches Asphalt Concrete (AC) over 8 inches Class 2 Aggregate Base (AB), unless otherwise approved by the Department of Public Works and Facilities and the Engineering and Surveying Division. (Ref. Section 4, Land Development Manual).</i></p> <p><i>This signalization improvement is included in the County's adopted fee program and CIP and, thus, the project would receive fee credits and reimbursement towards the cost of the</i></p>	<p>Placer County Department of Public Works and Facilities</p> <p>Placer County Engineering and Surveying Division</p>	Prior to certificate of compliance	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>improvement.</i>			
9-4	Increased impacts to vehicle safety due to roadway design features (i.e. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	9-4 <i>Prior to issuance of building permits, the project applicant shall submit a Traffic Management Plan (TMP) to the County for review and approval. The measures contained in the TMP shall be implemented when identified events of a specific size and schedule (to be specified in the TMP) occur on the project site. Measures may include, but would not be limited to, the use of temporary advance warning signs that inform background traffic of events.</i>	Placer County Department of Public Works and Facilities Placer County Engineering and Surveying Division	Prior to issuance of building permits	
Chapter 11 – Cumulative Impacts and Other CEQA Sections					
11-7	Study intersections under Cumulative Plus Project <u>With Village at Loomis</u> Conditions.	11-7 <i>The proposed project shall be subject to the payment of traffic impact fees that are in effect in the project area (Newcastle/Horseshoe Bar/Penryn District), pursuant to applicable Ordinances and Resolutions. The applicant is notified that the following traffic mitigation fee(s) shall be required and shall be paid to Placer County DPW prior to issuance of any building permits for the project:</i> <i>A. County Wide Traffic Limitation Zone: Article 15.28.010, Placer County Code</i> <i>B. South Placer Regional Transportation Authority (SPRTA)</i> <i>The current estimated fee is \$6,695 per dwelling unit equivalent. The fees were</i>	Placer County Department of Public Works and Facilities Placer County Engineering and Surveying Division	Prior to issuance of building permits	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>calculated using the information supplied. If either the use or the square footage changes, then the fees shall change. The actual fees paid shall be those in effect at the time the payment occurs.</i>			
11-8	Study intersections under Cumulative Plus Project <u>Without Village at Loomis</u> Conditions.	11-8 <i>Implement Mitigation Measures 11-7.</i>	See Mitigation Measures 11-7	See Mitigation Measures 11-7	
Initial Study					
VI-2 VI-3	Result in significant disruptions, displacements, compaction or overcrowding of the soil. Result in substantial change in topography or ground surface relief features.	<i>VI.1: The applicant shall prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual [LDM] that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans shall show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, shall be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, shall be included in the Improvement Plans. The applicant shall pay plan check and inspection fees and, if applicable, Placer</i>	Placer County Engineering and Surveying Division	Prior to issuance of building permits	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>County Fire Department Improvement Plan review and inspection fees, with the 1st Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction costs shall be paid). The cost of the above-noted landscape and irrigation facilities shall be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process shall be completed prior to submittal of Improvement Plans. Record drawings shall be prepared and signed by a California Registered Civil Engineer at the applicant's expense and shall be submitted to the ESD in both hard copy and electronic versions in a format to be approved by the ESD prior to acceptance by the County of site improvements.</i></p> <p><i>Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.</i></p> <p><i>Any Building Permits associated with this project shall not be issued until, at a</i></p>			

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>minimum, the Improvement Plans are approved by the Engineering and Surveying Division.</i></p> <p><i>VI.2: The Improvement Plans shall show all proposed grading, drainage improvements, vegetation and tree removal and all work shall conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance shall occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes shall be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the Engineering and Surveying Division (ESD) concurs with said recommendation.</i></p> <p><i>The applicant shall revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, shall include regular watering to ensure adequate growth. A winterization plan shall be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during,</i></p>	<p>Placer County Engineering and Surveying Division</p> <p>Development Review Committee</p>	<p>Prior to Improvement Plan approval</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>and after project construction. Soil stockpiling or borrow areas, shall have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the ESD.</i></p> <p><i>The applicant shall submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit shall be refunded to the project applicant or authorized agent.</i></p> <p><i>If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans shall be reviewed by the DRC/ESD for a determination of substantial conformance to the project</i></p>			

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.</i></p> <p><i>VI.3: The Improvement Plan submittal shall include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Division (ESD) review. The report shall address and make recommendations on the following:</i></p> <p><i>A. Road, pavement, and parking area design;</i> <i>B. Structural foundations, including retaining wall design (if applicable);</i> <i>C. Grading practices;</i> <i>D. Erosion/winterization;</i> <i>E. Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, potential for smectite clays etc.); and</i> <i>F. Slope stability.</i></p> <p><i>Two copies of the final report shall be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity</i></p>	<p>Placer County Engineering and Surveying Division</p>	<p>Prior to Improvement Plan approval</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>with recommendations contained in the report.</i>			
VI-5	Result in any significant increase in wind or water erosion of soils, either on or off the site.	<p><i>VI.4: The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions).</i></p> <p><i>Construction (temporary) BMPs for the project may include, but are not limited to: Fiber Rolls (SE-5), Straw Bale Barrier (SE-9), Straw Wattles, Storm Drain Inlet Protection (SE-10), Velocity Dissipation Devices (EC-10), Silt Fence (SE-1), Wind Erosion Control (WE-1), Stabilized Construction Entrance (TC-1), Hydroseeding (EC-4), revegetation techniques, and dust control measures.</i></p> <p><i>VI-5: Prior to construction commencing, the applicant shall provide evidence to the Engineering and Surveying Division of a WDID number generated from the State Regional Water Quality Control Board's Stormwater Multiple Application & Reports</i></p>	Placer County Engineering and Surveying Division	Prior to Improvement Plan approval	
VI-6	Result in changes in deposition or erosion or changes in siltation which may modify the channel of a river, stream, or lake.		Placer County Engineering and Surveying Division RWQCB	Prior to initiation of construction activities	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction stormwater quality permit.</i>			
IV-8	Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	<i>VI.6: Implement MM VI.3.</i>	See MM VI.3	See MM VI.3	
IV-9	Be located on expansive soils, as defined in Chapter 18 of the California Building Code, creating substantial risks to life or property.				
IX-3	Substantially alter the existing drainage pattern of the site or area.	<i>IX.1: As part of the Improvement Plan submittal process, the preliminary Drainage Report provided during environmental review shall be submitted in final format. The final Drainage Report may require more detail than that provided in the preliminary report, and will be reviewed in concert with the Improvement</i>	Placer County Engineering and Surveying Division	Prior to Improvement Plan approval	
IX-4	Increase the rate or amount of surface runoff.				

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>Plans to confirm conformity between the two. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report shall be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Storm Water Management Manual that are in effect at the time of Improvement Plan submittal.</i></p> <p><i>IX.2: This project is subject to the one-time payment of drainage improvement and flood control fees for the Secret Ravine Watershed. The current estimated development fee is \$2,179 per gross parcel acreage, payable to the Engineering and Surveying Division prior to Building Permit issuance. The fees to be paid shall be based on the fee program in effect at the time that the application is deemed complete.</i></p>	Placer County Engineering and Surveying Division	Prior to building permit issuance	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<i>IX.3: This project is subject to payment of annual drainage improvement and flood control fees for the Secret Ravine Watershed. Prior to Building Permit issuance, the applicant shall cause the subject property to become a participant in the existing Secret Ravine Watershed County Service Area for purposes of collecting these annual assessments. The current estimated annual fee is \$344 per acre. (MM) (DPWF)</i>	Placer County Department of Public Works and Facilities	Prior to building permit issuance	
IX-5	Create or contribute runoff water which would include substantial additional sources of polluted water.	<i>IX.4: The Improvement Plans shall show that water quality treatment facilities/Best Management Practices (BMPs) shall be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD) such as the Stormwater Quality Design Manual for the Sacramento and South Placer Regions). Storm drainage from on- and off-site impervious surfaces (including roads) shall be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified</i>	Placer County Engineering and Surveying Division	Prior to Improvement Plan approval	
IX-6	Otherwise substantially degrade surface water quality.				
IX-7	Otherwise substantially degrade ground water quality.				

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs shall be designed at a minimum in accordance with the Placer County Guidance Document for Volume and Flow-Based Sizing of Permanent Post-Construction Best Management Practices for Stormwater Quality Protection. Post-development (permanent) BMPs for the project include, but are not limited to: Vegetated Swales (TC-30), Water Quality Inlets (TC-50), Storm Drain Signage (SD-13), Sweeping and Vacuuming Pavement (SE-7), Pervious Pavements (SD-20), etc. No water quality facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.</i></p> <p><i>All BMPs shall be maintained as required to insure effectiveness. The applicant shall provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, shall be provided to ESD upon request. Maintenance of these facilities shall be provided by the project owners/permittees unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming,</i></p>			

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>and catch basin cleaning program shall be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan approval, easements shall be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.</i></p> <p><i>IX-5: The Improvement Plans shall include the message details, placement, and locations showing that all storm drain inlets and catch basins within the project area shall be permanently marked/embossed with prohibitive language such as “No Dumping! Flows to Creek.” or other language and/or graphical icons to discourage illegal dumping as approved by the Engineering and Surveying Division (ESD). ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the project area. The Property Owners’ association is responsible for maintaining the legibility of stamped messages and signs.</i></p> <p><i>IX-6: The Improvement Plans shall show that all stormwater runoff shall be diverted around trash storage areas to minimize contact with pollutants. Trash container areas shall be</i></p>	<p>Placer County Engineering and Surveying Division</p> <p>Placer County Engineering and Surveying Division</p>	<p>Prior to Improvement Plan approval</p> <p>Prior to Improvement Plan approval</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>screened or walled to prevent off-site transport of trash by the forces of water or wind. Trash containers shall not be allowed to leak and must remain covered when not in use.</i></p> <p><i>IX.7: This project is located within the permit area covered by Placer County’s Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000004, Order No. 2013-0001-DWQ), pursuant to the NPDES Phase II program. Project-related stormwater discharges are subject to all applicable requirements of said permit.</i></p> <p><i>The project shall implement permanent and operational source control measures as applicable. Source control measures shall be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and shall be shown on the Improvement Plans.</i></p> <p><i>The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat stormwater,</i></p>	<p>Placer County Engineering and Surveying Division</p>	<p>Prior to Improvement Plan approval</p>	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p><i>and provide baseline hydromodification management to the extent feasible, as determined by ESD.</i></p> <p><i>IX.8: Per the State of California NPDES Phase II MS4 Permit, this project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. A final Storm Water Quality Plan (SWQP) shall be submitted, either within the final Drainage Report or as a separate document that identifies how this project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, shall be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II MS4 permit, projects creating and/or replacing one acre or more of impervious surface are also required to demonstrate hydromodification management of stormwater such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.</i></p>	Placer County Engineering and Surveying Division	Prior to Improvement Plan approval	

MITIGATION MONITORING AND REPORTING PROGRAM UNITED AUBURN INDIAN COMMUNITY SCHOOL PROJECT					
Impact Number	Impact	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
IX-12	Impact the watershed of important surface water resources, including but not limited to Lake Tahoe, Folsom Lake, Hell Hole Reservoir, Rock Creek Reservoir, Sugar Pine Reservoir, French Meadows Reservoir, Combie Lake, and Rollins Lake.	<i>Implement MM IX.4, MM IX.5, MM IX.6, and MM IX.7.</i>	See MM IX.4, MM IX.5, MM IX.6, and MM IX.7	See MM IX.4, MM IX.5, MM IX.6, and MM IX.7	

APPENDIX

October 19, 2018

Mr. Nick Pappani
RANEY PLANNING AND MANAGEMENT
1501 Sports Drive
Sacramento, CA 95834

RE: UNITED AUBURN INDIAN COMMUNITY (UAIC) MASTER PLAN & SCHOOL PROJECT EIR, PLACER COUNTY: RESPONSE TO COMMENTS.

Dear Mr. Pappani:

As we have discussed, our firm prepared the June 25, 2018 traffic impact analysis for the **United Auburn Indian Community (UAIC)'s Master Plan & School Project EIR**. We have reviewed the September 5, 2017 comment letter from Caltrans District 3, and our responses are noted below:

Potential Impacts to I-80 interchanges at Penryn Road and Horseshoe Bar Road.

To respond to Caltrans' comments about these interchanges we assembled available information, conducted new traffic counts and evaluated Level of Service impacts as applicable.

The operation of the **I-80 / Horseshoe Bar Road interchange ramp** intersections in Loomis is described in the Draft Environmental Impact Report for the Costco project proposed on Sierra College Blvd¹. That document indicates that the signalized WB ramps intersection operates at LOS B, while the stop-controlled EB ramps intersection operates at LOS F in the morning and evening peak hours. We are aware that the Town of Loomis was evaluating its five-year Capital Improvement Program (CIP) at its October 9th Town Council Meeting and that a traffic signal at this location was included in the Draft CIP.²

The impacts of the UAIC school were not evaluated at this location based on the small amount of traffic added by the school. The Costco DEIR indicates that the Town considers the impact of a project to be insignificant at a deficient unsignalized intersection if its contribution to total peak hour traffic volume is less than 5% of the background volume. In this case, the UAIC's trips at the eastbound ramp intersection total 16 in the a.m. peak hour and 1 in the p.m. peak hour. This represents 1.2% of the existing traffic in the a.m. peak hour and <1% in the p.m. peak hour. As these increments are less than the 5% permitted under Town policy, the UAIC school's impacts are not significant.

¹ Loomis Costco Draft Environmental Impact Report, AECOM, June 2018

² <https://loomis.ca.gov/town-government/council-agendas/council-agenda-2018/10-9-18-council-agenda/>

New a.m. and p.m. peak hour traffic counts were conducted at the two I-80 / Penryn Road interchange ramp intersections on Tuesday October 9th and Wednesday October 10th. This data is attached and was used to evaluate the current operating Level of Service, which is noted in Table 1.

The current Level of Service at the signalized westbound ramps intersection is very good and meets applicable minimum standards. The ramps queues were not observed to be appreciable at the time of our counts.

The Level of Service at the eastbound ramp intersection is LOS C in the a.m. and p.m. peak hour which satisfies the minimum LOS D standard. However, the volume of traffic satisfies peak hour traffic signal warrants based on the “rural” criteria that are appropriate for the speed limit on this segment of Penryn Road. An all-way stop might be considered and would deliver LOS C. This location is addressed by Placer County’s Newcastle / Horseshoe Bar / Penryn traffic impact fee Benefit District where a traffic signal is identified.

Traffic conditions along the I-80 corridor vary greatly due to mainline I-80 congestion and the choices made by motorists regarding alternative routes. For example, when eastbound I-80 is slowed due to collisions or weekend congestion in Auburn many motorists abandon the highway and use alternative parallel routes. Congestion can become severe on Taylor Road and on the ramp connections to that County road. Similarly on Sundays westbound I-80 traffic is slowed and motorists may leave the highway at the Penryn Road interchange to use Boyington Road to reach Taylor Road.

The addition of project trips would not have a significant impact at either location under regular weekday conditions. The Levels of Service at the Westbound ramps and Eastbound ramps intersections will remain with the LOS D minimums standard. While peak hour signal warrants would continue to be satisfied, both Level of Service and signal warrant criteria need to be satisfied under Placer County methodology to determine a significant impact. Thus, the proposed project’s impact is not significant, and no mitigation is required.

KDA

**TABLE 1
 EXISTING PLUS PROJECT LEVELS OF SERVICE AT THE INTERSTATE 80 / PENRYN ROAD INTERCHANGE**

Intersection	Control	AM Peak Hour				PM Peak Hour			
		Existing		Existing Plus UAIC School		Existing		Existing Plus UAIC School	
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Penryn Road / Westbound I-80 ramps	Traffic Signal	25.0	C	27.5	C	21.5	C	21.5	C
Penryn Road / Eastbound I-80 ramps (overall)	EB/SB Stop	(20.5)	(C)	(21.0)	(C)	(18.5)	(C)	(19.0)	(C)
NB left turn		7.9	A	7.9	A	7.8	A	7.9	A
SB left turn		7.8	A	7.8	A	7.6	A	7.6	A
EB approach		25.8	C	26.5	D	20.7	C	21.6	C
Wb approach		13.7	B	13.8	B	13.8	B	14.0	B

(overall) LOS is based on the weighted average delay for all movements that yield the right of way. Overall average delay rounded to nearest 0.5 sec

**TABLE 2
 EXISTING PLUS PROJECT 95TH PERCENTILE RAMP QUEUES AT THE INTERSTATE 80 / PENRYN ROAD INTERCHANGE**

Intersection	Storage (feet)	AM Peak Hour				PM Peak Hour			
		Existing		Existing Plus UAIC School		Existing		Existing Plus UAIC School	
		Volume (vph)	Queue (feet)	Volume (vph)	Queue (feet)	Volume (vph)	Queue (feet)	Volume (vph)	Queue (feet)
Penryn Road / Westbound I-80 ramps	785	160	145	186	165	177	130	188	135
Penryn Road / Eastbound I-80 ramps	750	166	108	166	110	245	113	245	118
EB left turn+thru									
EB right turn ¹	25	96	<25	96	<25	186	<25	186	<25

¹ observation noted a “defacto” right turn lane created by shoulder and curb return.
 Without assumed right turn lane lane total queue is 173 (AM) 255 (PM), 178 (AM PP) and 270 (PM PP)

KDA

Requested Traffic Study Update

The comments ask for ***future cumulative analysis of the Horseshoe Bar Road and Penryn Road interchanges***. The Costco DEIR traffic study introduced long term cumulative conditions at the two I-80 / Horseshoe Bar Road interchange ramp intersections in Loomis. While the westbound ramps intersection was shown to deliver Level of Service that met applicable Town minimum standards, the eastbound ramps intersection was shown to operate at LOS F with no improvements. While the Costco DEIR traffic study did not discuss any improvements to this location, interchange improvements are included in the Town's traffic impact fee program and are being considered for the Town's short-term CIP.

Under Town of Loomis policy the additional trips caused by the UAIC school would not have a significant traffic impact to the interchange as its trips would be too little to cause the westbound ramps intersection to reach an unacceptable LOS, and UAIC school trips would represent less than 5% of the cumulative volume at the deficient eastbound ramp intersection.

No information is readily available regarding long term conditions at the I-80 / Penryn Road interchange. However, as noted above, the interchange improvements are already included in the Newcastle / Horseshoe Bar / Penryn impact fee. While the significance of UAIC school cumulative impacts at the I-80 / Penryn Road intersection has not been calculated, because this location is addressed by the County's fee program, the UAIC school would contribute its fair share to cumulatively needed improvements by paying adopted fees.

The comments ask for analysis of ***freeway ramp merge-diverge Levels of Service and ramp queues*** at the two interchanges. Ramp merge-diverge Level of Service is not normally requested as a part of Placer County traffic impact analyses and was not mentioned in the response to the UAIC school DEIR's Notice of Preparation. Ramp merge-diverge analysis is beyond the scope of the UAIC school traffic analysis and is not required to adequately assess the project's impacts.

As noted earlier interchange improvements are included in the Town of Loomis traffic impact fee program, and the Town is considering including the Horseshoe Bar Road / eastbound I-80 ramps intersection traffic signal in its short-term CIP.

As noted earlier, the UAIC school's contribution to peak hour traffic volumes at the I-80/ Horseshoe Bar Road ramps intersections is less than the 5% increment permitted under Town of Loomis policy, and as a result the UAIC School's impact is not significant.

The length of queues at the I-80 / Penryn Road interchange were identified as a byproduct of Level of Service analysis and are noted in Table 2. As indicated under current conditions the length of peak period queues is well within the available storage provided by the off-ramps. Peak hour queues do not approach the freeway mainline with or without the project. Thus, the impacts of the UAIC school on ramps queue is not significant at this location.

KDA

As noted in the discussion of Level of Service, it is possible that conditions on I-80 ramps are occasionally influenced by mainline congestion which in turn causes motorists to leave the freeway and choose alternative routes. This could be the case on peak Fridays and Sundays when Taylor Road becomes an attractive alternative. The I-80 / Penryn Road ramps could be affected at those times.

The project's contribution to **regional VMT** and the associated need for improvements to **bicycle, pedestrian and public transit facilities** has been assessed. The DEIR discusses current pedestrian and bicycle facilities that are already available in the vicinity of the UAIC school and notes that these facilities are consistent with the County's long-range plan for Taylor Road. Sidewalks are not applicable in this rural location and the existing Class II bike lane remains appropriate. The project proponents have elected to include private transit facilities in the project description, and nearly all students will be transported to and from the school by a fleet of vans. Van transport is already provided to the current school site and is a feasible option for the new school. As noted in the DEIR traffic analysis this feature has the effect of reducing site trip generation, and logically regional Vehicle Miles Traveled (VMT).

Provision of van service would be included as a condition of approval for the proposed project. Any future decision to remove van service would require a modification to the project's Conditional Use Permit (CUP) and, thus, would require subsequent environmental analysis.

Thank you for your attention to this information. Please don't hesitate to contact me if you have any questions.

Sincerely,

KD Anderson & Associates, Inc.



Kenneth D. Anderson, P.E.
President

Attachments

KD ANDERSON & ASSOCIATES, INC.

(916) 660-1555

Placer County
All Vehicles & Uturns On Unshifted
Bikes & Peds On Bank 1
Nothing On Bank 2

File Name : Penryn Rd & EB I-80 Ramps
Date : 10/10/2018

Unshifted Count = All Vehicles & Uturns

START TIME	Penryn Road Southbound					EB I-80 Ramps Westbound					Penryn Road Northbound					EB I-80 Ramps Eastbound					Total	Uturns Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL		
7:00	2	20	9	0	31	1	1	0	0	2	15	52	2	0	69	21	1	20	0	42	144	0
7:15	2	20	10	0	32	1	2	3	0	6	17	55	1	0	73	43	0	15	0	58	169	0
7:30	2	32	20	0	54	2	3	11	0	16	20	70	1	0	91	50	2	33	0	85	246	0
7:45	1	40	9	0	50	1	0	7	0	8	14	47	0	0	61	39	0	21	0	60	179	0
Total	7	112	48	0	167	5	6	21	0	32	66	224	4	0	294	153	3	89	0	245	738	0
8:00	2	31	13	0	46	5	2	4	0	11	21	55	1	0	77	28	4	27	0	59	193	0
8:15	0	14	14	0	28	1	2	2	0	5	16	42	2	0	60	25	3	15	0	43	136	0
8:30	4	17	11	0	32	1	1	4	0	6	21	39	0	0	60	31	2	21	0	54	152	0
8:45	2	27	10	0	39	1	1	4	0	6	10	44	2	0	56	32	2	38	0	72	173	0
Total	8	89	48	0	145	8	6	14	0	28	68	180	5	0	253	116	11	101	0	228	654	0
12:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:00	1	25	16	0	42	0	1	6	0	7	19	48	1	0	68	64	2	45	0	111	228	0
16:15	3	24	15	0	42	2	2	3	0	7	21	39	3	0	63	62	4	49	0	115	227	0
16:30	3	24	21	0	48	1	2	5	0	8	18	22	1	0	41	51	2	33	0	86	183	0
16:45	1	24	16	0	41	2	1	3	0	6	14	39	3	0	56	56	5	43	0	104	207	0
Total	8	97	68	0	173	5	6	17	0	28	72	148	8	0	228	233	13	170	0	416	845	0
17:00	2	35	28	0	65	5	2	5	0	12	27	50	1	0	78	65	6	53	0	124	279	0
17:15	4	31	17	0	52	2	1	4	0	7	15	30	5	0	50	60	3	46	0	109	218	0
17:30	0	24	19	0	43	4	0	1	0	5	6	35	1	0	42	58	3	39	0	100	190	0
17:45	3	24	19	0	46	1	1	7	0	9	25	35	4	0	64	45	5	48	0	98	217	0
Total	9	114	83	0	206	12	4	17	0	33	73	150	11	0	234	228	17	186	0	431	904	0
Grand Total	32	412	247	0	691	30	22	69	0	121	279	702	28	0	1009	730	44	546	0	1320	3141	0
Apprch %	4.6%	59.6%	35.7%	0.0%		24.8%	18.2%	57.0%	0.0%		27.7%	69.6%	2.8%	0.0%		55.3%	3.3%	41.4%	0.0%			
Total %	1.0%	13.1%	7.9%	0.0%	22.0%	1.0%	0.7%	2.2%	0.0%	3.9%	8.9%	22.3%	0.9%	0.0%	32.1%	23.2%	1.4%	17.4%	0.0%	42.0%	100.0%	

AM PEAK HOUR	Penryn Road Southbound					EB I-80 Ramps Westbound					Penryn Road Northbound					EB I-80 Ramps Eastbound					Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	
Peak Hour Analysis From 07:15 to 08:15																					
Peak Hour For Entire Intersection Begins at 07:15																					
7:15	2	20	10	0	32	1	2	3	0	6	17	55	1	0	73	43	0	15	0	58	169
7:30	2	32	20	0	54	2	3	11	0	16	20	70	1	0	91	50	2	33	0	85	246
7:45	1	40	9	0	50	1	0	7	0	8	14	47	0	0	61	39	0	21	0	60	179
8:00	2	31	13	0	46	5	2	4	0	11	21	55	1	0	77	28	4	27	0	59	193
Total Volume	7	123	52	0	182	9	7	25	0	41	72	227	3	0	302	160	6	96	0	262	787
% App Total	3.8%	67.6%	28.6%	0.0%		22.0%	17.1%	61.0%	0.0%		23.8%	75.2%	1.0%	0.0%		61.1%	2.3%	36.6%	0.0%		
PHF	.875	.769	.650	.000	.843	.450	.583	.568	.000	.641	.857	.811	.750	.000	.830	.800	.375	.727	.000	.771	.800

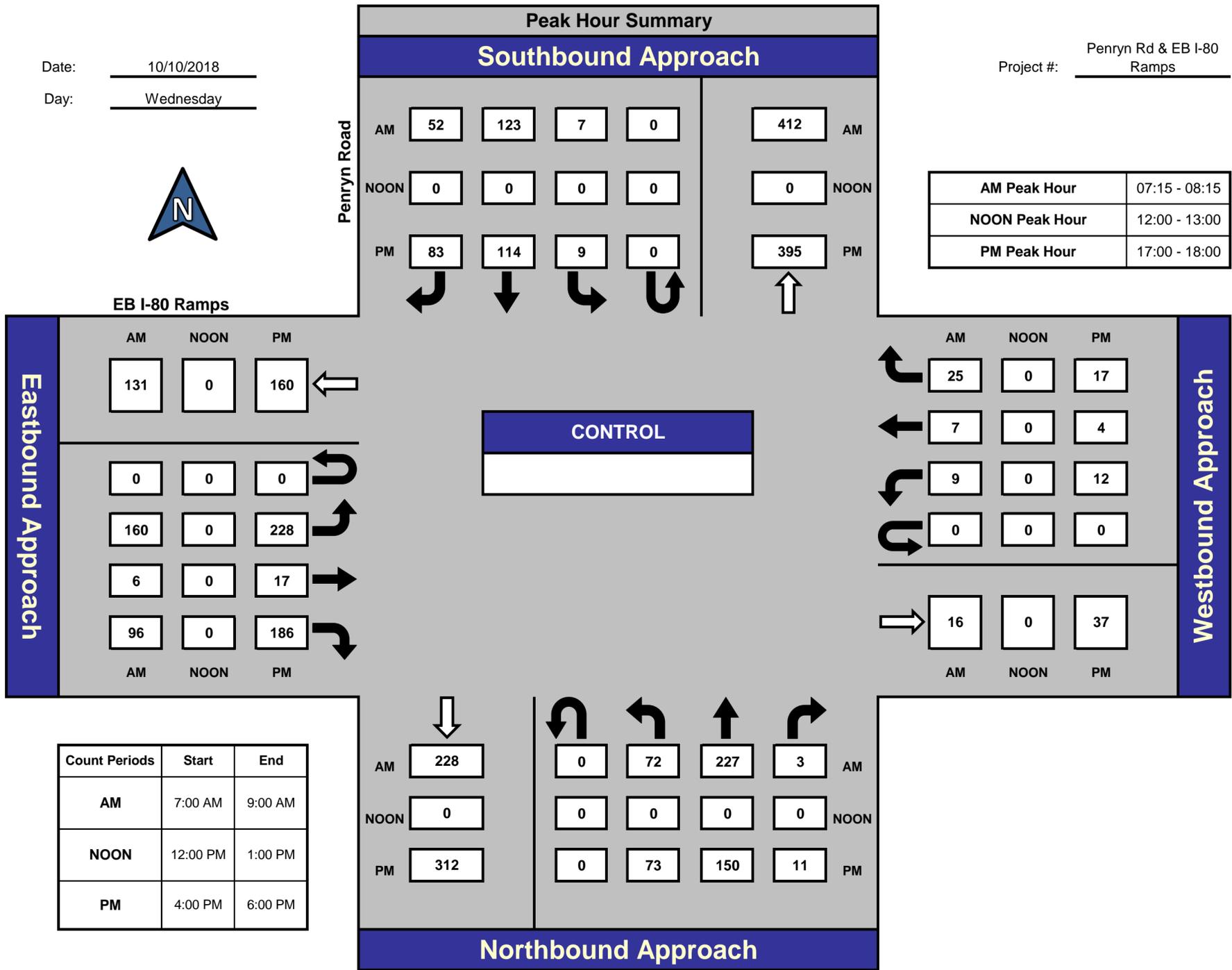
NOON PEAK HOUR	Penryn Road Southbound					EB I-80 Ramps Westbound					Penryn Road Northbound					EB I-80 Ramps Eastbound					Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	
Peak Hour Analysis From 12:00 to 13:00																					
Peak Hour For Entire Intersection Begins at 12:00																					
12:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% App Total	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		
PHF	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000

PM PEAK HOUR	Penryn Road Southbound					EB I-80 Ramps Westbound					Penryn Road Northbound					EB I-80 Ramps Eastbound					Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	
Peak Hour Analysis From 17:00 to 18:00																					
Peak Hour For Entire Intersection Begins at 17:00																					
17:00	2	35	28	0	65	5	2	5	0	12	27	50	1	0	78	65	6	53	0	124	279
17:15	4	31	17	0	52	2	1	4	0	7	15	30	5	0	50	60	3	46	0	109	218
17:30	0	24	19	0	43	4	0	1	0	5	6	35	1	0	42	58	3	39	0	100	190
17:45	3	24	19	0	46	1	1	7	0	9	25	35	4	0	64	45	5	48	0	98	217
Total Volume	9	114	83	0	206	12	4	17	0	33	73	150	11	0	234	228	17	186	0	431	904
% App Total	4.4%	55.3%	40.3%	0.0%		36.4%	12.1%	51.5%	0.0%		31.2%	64.1%	4.7%	0.0%		52.9%	3.9%	43.2%	0.0%		
PHF	.563	.814	.741	.000	.792	.600	.500	.607	.000	.688	.676	.750	.550	.000	.750	.877	.708	.877	.000	.869	.810

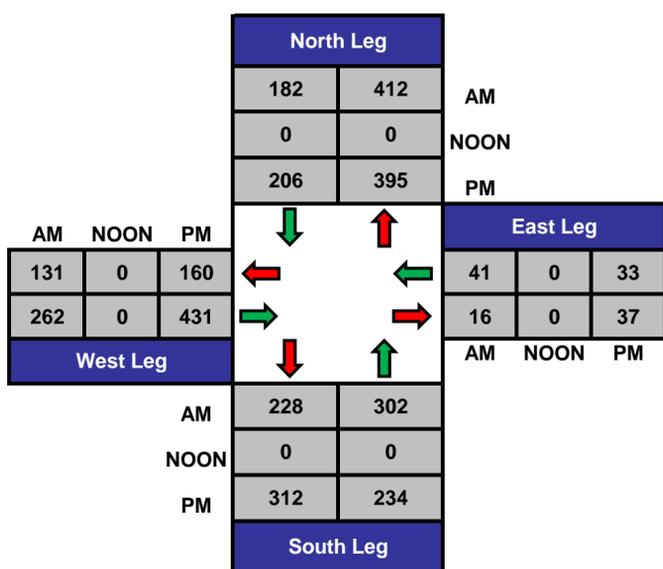
Penryn Rd & EB I-80 Ramps

Date: 10/10/2018
 Day: Wednesday

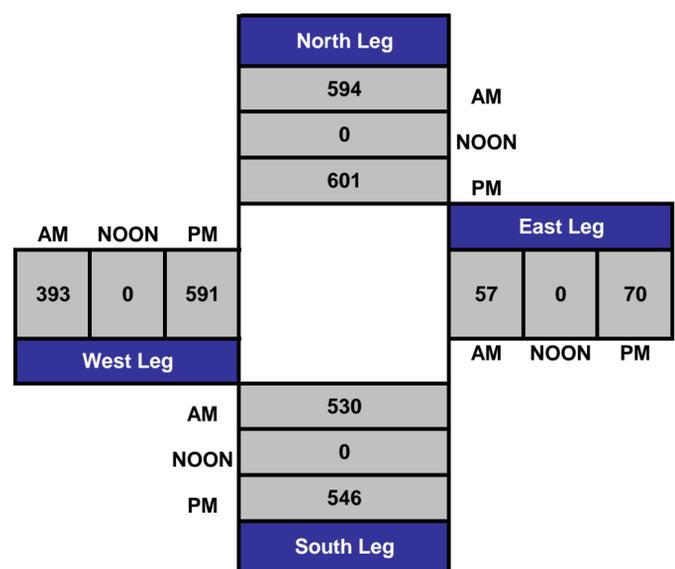
Project #: Penryn Rd & EB I-80 Ramps



Total Ins & Outs



Total Volume Per Leg



KD ANDERSON & ASSOCIATES, INC.

(916) 660-1555

Placer County
All Vehicles & Uturns On Unshifted
Bikes & Peds On Bank 1
Nothing On Bank 2

File Name : Penryn Rd & WB I-80 Ramps
Date : 10/9/2018

Unshifted Count = All Vehicles & Uturns

START TIME	Penryn Road Southbound					WB I-80 Ramps Westbound					Penryn Road Northbound					WB I-80 Ramps Eastbound					Total	Uturns Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL		
7:00	33	19	9	0	61	8	22	8	0	38	12	25	49	0	86	3	13	11	0	27	212	0
7:15	42	11	7	0	60	10	16	10	0	36	16	43	39	0	98	3	10	11	0	24	218	0
7:30	93	23	13	0	129	10	22	10	0	42	25	51	49	0	125	7	22	14	0	43	339	0
7:45	66	24	11	0	101	11	34	11	0	56	12	44	44	0	100	9	23	4	0	36	293	0
Total	234	77	40	0	351	39	94	39	0	172	65	163	181	0	409	22	68	40	0	130	1062	0
8:00	63	31	13	0	107	6	26	6	0	38	14	59	47	0	120	5	14	13	0	32	297	0
8:15	51	15	15	0	81	7	10	7	0	24	22	32	31	0	85	4	15	17	0	36	226	0
8:30	46	14	5	0	65	9	10	9	0	28	12	26	33	0	71	5	27	11	0	43	207	0
8:45	39	9	6	0	54	6	18	6	0	30	11	21	44	0	76	2	12	9	0	23	183	0
Total	199	69	39	0	307	28	64	28	0	120	59	138	155	0	352	16	68	50	0	134	913	0
12:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16:00	31	15	3	0	49	10	14	7	0	31	18	60	30	0	108	7	16	13	0	36	224	0
16:15	39	17	9	0	65	11	18	9	0	38	22	59	42	0	123	5	8	14	0	27	253	0
16:30	27	11	8	0	46	13	8	8	0	29	11	61	28	0	100	2	10	15	0	27	202	0
16:45	31	13	5	0	49	15	20	9	0	44	13	46	23	0	82	5	6	12	0	23	198	0
Total	128	56	25	0	209	49	60	33	0	142	64	226	123	0	413	19	40	54	0	113	877	0
17:00	25	30	8	0	63	8	17	14	0	39	16	54	24	0	94	10	14	15	0	39	235	0
17:15	36	13	4	0	53	9	26	17	0	52	31	68	38	0	137	10	15	17	0	42	284	0
17:30	35	18	5	0	58	11	16	14	0	41	23	64	30	0	117	8	13	17	0	38	254	0
17:45	38	18	9	0	65	10	16	19	0	45	20	54	33	0	107	9	11	10	0	30	247	0
Total	134	79	26	0	239	38	75	64	0	177	90	240	125	0	455	37	53	59	0	149	1020	0
Grand Total	695	281	130	0	1106	154	293	164	0	611	278	767	584	0	1629	94	229	203	0	526	3872	0
Apprch %	62.8%	25.4%	11.8%	0.0%		25.2%	48.0%	26.8%	0.0%		17.1%	47.1%	35.9%	0.0%		17.9%	43.5%	38.6%	0.0%			
Total %	17.9%	7.3%	3.4%	0.0%	28.6%	4.0%	7.6%	4.2%	0.0%	15.8%	7.2%	19.8%	15.1%	0.0%	42.1%	2.4%	5.9%	5.2%	0.0%	13.6%	100.0%	

AM PEAK HOUR	Penryn Road Southbound					WB I-80 Ramps Westbound					Penryn Road Northbound					WB I-80 Ramps Eastbound					Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	
Peak Hour Analysis From 07:30 to 08:30																					
Peak Hour For Entire Intersection Begins at 07:30																					
7:30	93	23	13	0	129	10	22	10	0	42	25	51	49	0	125	7	22	14	0	43	339
7:45	66	24	11	0	101	11	34	11	0	56	12	44	44	0	100	9	23	4	0	36	293
8:00	63	31	13	0	107	6	26	6	0	38	14	59	47	0	120	5	14	13	0	32	297
8:15	51	15	15	0	81	7	10	7	0	24	22	32	31	0	85	4	15	17	0	36	226
Total Volume	273	93	52	0	418	34	92	34	0	160	73	186	171	0	430	25	74	48	0	147	1155
% App Total	65.3%	22.2%	12.4%	0.0%		21.3%	57.5%	21.3%	0.0%		17.0%	43.3%	39.8%	0.0%		17.0%	50.3%	32.7%	0.0%		
PHF	.734	.750	.867	.000	.810	.773	.676	.773	.000	.714	.730	.788	.872	.000	.860	.694	.804	.706	.000	.855	.852

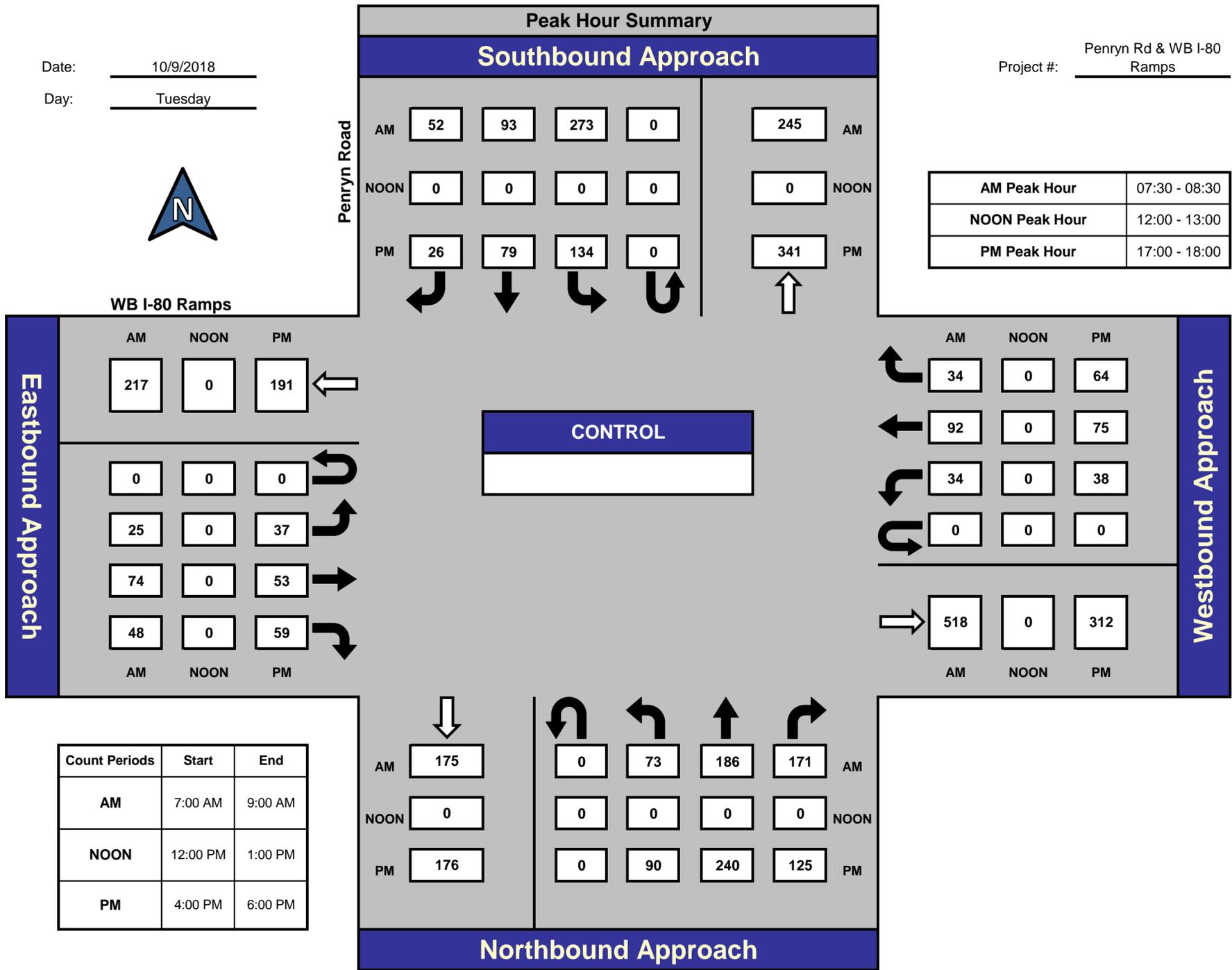
NOON PEAK HOUR	Penryn Road Southbound					WB I-80 Ramps Westbound					Penryn Road Northbound					WB I-80 Ramps Eastbound					Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	
Peak Hour Analysis From 12:00 to 13:00																					
Peak Hour For Entire Intersection Begins at 12:00																					
12:00 PM	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12:45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
% App Total	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%		
PHF	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000	.000

PM PEAK HOUR	Penryn Road Southbound					WB I-80 Ramps Westbound					Penryn Road Northbound					WB I-80 Ramps Eastbound					Total
	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	LEFT	THRU	RIGHT	UTURNS	APP.TOTAL	
Peak Hour Analysis From 17:00 to 18:00																					
Peak Hour For Entire Intersection Begins at 17:00																					
17:00	25	30	8	0	63	8	17	14	0	39	16	54	24	0	94	10	14	15	0	39	235
17:15	36	13	4	0	53	9	26	17	0	52	31	68	38	0	137	10	15	17	0	42	284
17:30	35	18	5	0	58	11	16	14	0	41	23	64	30	0	117	8	13	17	0	38	254
17:45	38	18	9	0	65	10	16	19	0	45	20	54	33	0	107	9	11	10	0	30	247
Total Volume	134	79	26	0	239	38	75	64	0	177	90	240	125	0	455	37	53	59	0	149	1020
% App Total	56.1%	33.1%	10.9%	0.0%		21.5%	42.4%	36.2%	0.0%		19.8%	52.7%	27.5%	0.0%		24.8%	35.6%	39.6%	0.0%		
PHF	.882	.658	.722	.000	.919	.864	.721	.842	.000	.851	.726	.882	.822	.000	.830	.925	.883	.868	.000	.887	.898

Penryn Rd & WB I-80 Ramps

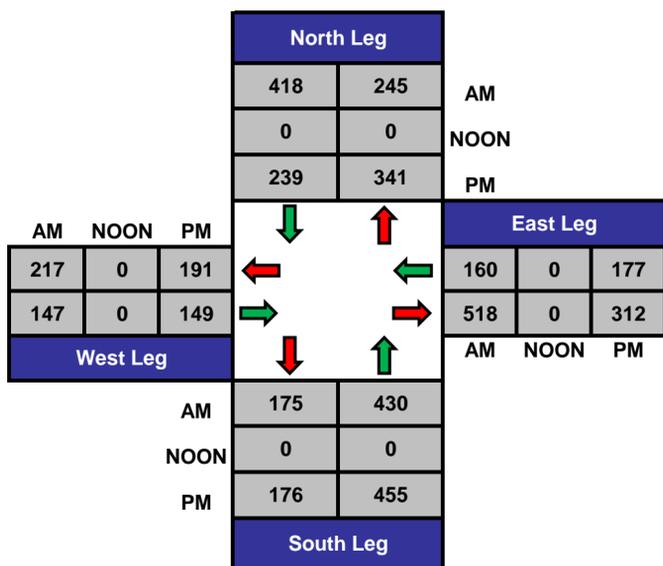
Date: 10/9/2018
Day: Tuesday

Project #: Penryn Rd & WB I-80 Ramps

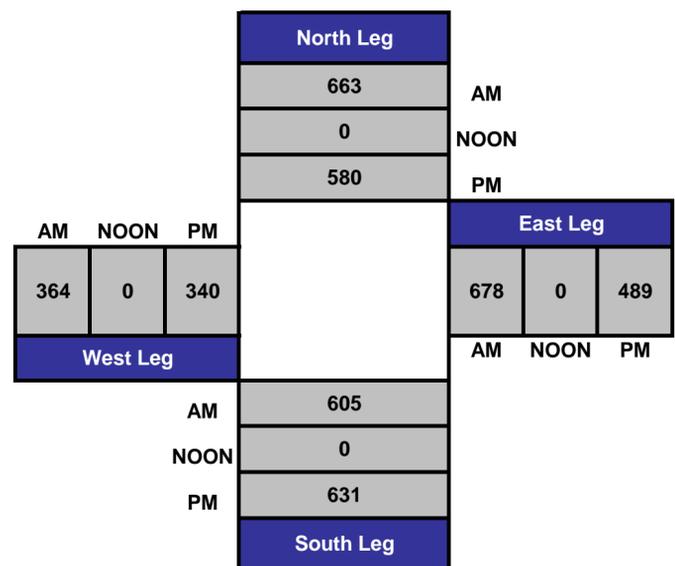


Count Periods	Start	End
AM	7:00 AM	9:00 AM
NOON	12:00 PM	1:00 PM
PM	4:00 PM	6:00 PM

Total Ins & Outs



Total Volume Per Leg



Queues
3: PENRYN ROAD & WB RAMPS

EXISTING AM
10/15/2018



Lane Group	EBT	WBT	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	172	188	86	219	201	321	109	61
v/c Ratio	0.58	0.59	0.47	0.64	0.47	0.76	0.17	0.10
Control Delay	35.6	36.7	45.2	39.8	11.5	43.8	21.9	0.4
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	35.6	36.7	45.2	39.8	11.5	43.8	21.9	0.4
Queue Length 50th (ft)	66	77	39	96	11	141	37	0
Queue Length 95th (ft)	132	146	92	181	63	#312	84	0
Internal Link Dist (ft)	600	465		573			882	
Turn Bay Length (ft)			50		50	75		25
Base Capacity (vph)	448	543	204	454	516	444	707	676
Starvation Cap Reductn	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.38	0.35	0.42	0.48	0.39	0.72	0.15	0.09

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

HCM 6th Signalized Intersection Summary
 3: PENRYN ROAD & WB RAMPS

EXISTING AM
 10/15/2018



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↗	↖	↗	↖	↖	↗
Traffic Volume (veh/h)	25	74	48	34	92	34	73	186	171	273	93	52
Future Volume (veh/h)	25	74	48	34	92	34	73	186	171	273	93	52
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	29	87	56	40	108	40	86	219	201	321	109	61
Peak Hour Factor	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	39	117	75	54	147	54	117	335	284	386	617	523
Arrive On Green	0.13	0.13	0.13	0.14	0.14	0.14	0.07	0.18	0.18	0.22	0.33	0.33
Sat Flow, veh/h	296	887	571	379	1024	379	1781	1870	1585	1781	1870	1585
Grp Volume(v), veh/h	172	0	0	188	0	0	86	219	201	321	109	61
Grp Sat Flow(s),veh/h/ln	1753	0	0	1783	0	0	1781	1870	1585	1781	1870	1585
Q Serve(g_s), s	5.3	0.0	0.0	5.7	0.0	0.0	2.7	6.1	6.7	9.7	2.3	1.5
Cycle Q Clear(g_c), s	5.3	0.0	0.0	5.7	0.0	0.0	2.7	6.1	6.7	9.7	2.3	1.5
Prop In Lane	0.17		0.33	0.21		0.21	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	231	0	0	256	0	0	117	335	284	386	617	523
V/C Ratio(X)	0.75	0.00	0.00	0.74	0.00	0.00	0.73	0.65	0.71	0.83	0.18	0.12
Avail Cap(c_a), veh/h	562	0	0	699	0	0	270	600	508	587	617	523
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.00	1.00	0.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	23.5	0.0	0.0	23.0	0.0	0.0	25.7	21.4	21.7	21.0	13.4	13.1
Incr Delay (d2), s/veh	4.7	0.0	0.0	4.1	0.0	0.0	8.6	2.2	3.3	6.2	0.1	0.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.3	0.0	0.0	2.5	0.0	0.0	1.3	2.7	2.5	4.3	0.9	0.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	28.2	0.0	0.0	27.1	0.0	0.0	34.3	23.6	24.9	27.2	13.5	13.2
LnGrp LOS	C	A	A	C	A	A	C	C	C	C	B	B
Approach Vol, veh/h		172			188			506			491	
Approach Delay, s/veh		28.2			27.1			26.0			22.4	
Approach LOS		C			C			C			C	
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	16.7	15.0		11.9	8.2	23.5		12.6				
Change Period (Y+Rc), s	4.5	5.0		4.5	4.5	5.0		4.5				
Max Green Setting (Gmax), s	18.5	18.0		18.0	8.5	18.0		22.0				
Max Q Clear Time (g_c+I1), s	11.7	8.7		7.3	4.7	4.3		7.7				
Green Ext Time (p_c), s	0.6	1.3		0.6	0.1	0.6		0.8				

Intersection Summary		
HCM 6th Ctrl Delay		25.1
HCM 6th LOS		C

Queues
3: PENRYN ROAD & WB RAMPS

EXISTING PM
10/15/2018



Lane Group	EBT	WBT	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	166	196	100	267	139	149	88	29
v/c Ratio	0.53	0.57	0.49	0.65	0.31	0.62	0.17	0.05
Control Delay	27.4	27.9	39.9	32.4	7.4	43.7	22.4	0.2
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	27.4	27.9	39.9	32.4	7.4	43.7	22.4	0.2
Queue Length 50th (ft)	46	58	37	93	1	55	27	0
Queue Length 95th (ft)	113	131	#111	197	44	#168	72	0
Internal Link Dist (ft)	600	465		573			882	
Turn Bay Length (ft)			50		50	75		25
Base Capacity (vph)	530	642	214	541	555	242	590	594
Starvation Cap Reductn	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.31	0.31	0.47	0.49	0.25	0.62	0.15	0.05

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

HCM 6th Signalized Intersection Summary
3: PENRYN ROAD & WB RAMPS

EXISTING PM
10/15/2018



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↗	↖	↗	↖	↖	↗
Traffic Volume (veh/h)	37	53	59	38	75	64	90	240	125	134	79	26
Future Volume (veh/h)	37	53	59	38	75	64	90	240	125	134	79	26
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	41	59	66	42	83	71	100	267	139	149	88	29
Peak Hour Factor	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	56	81	90	58	115	99	139	385	327	192	441	374
Arrive On Green	0.13	0.13	0.13	0.16	0.16	0.16	0.08	0.21	0.21	0.11	0.24	0.24
Sat Flow, veh/h	426	613	686	373	736	630	1781	1870	1585	1781	1870	1585
Grp Volume(v), veh/h	166	0	0	196	0	0	100	267	139	149	88	29
Grp Sat Flow(s),veh/h/ln	1726	0	0	1738	0	0	1781	1870	1585	1781	1870	1585
Q Serve(g_s), s	4.3	0.0	0.0	5.0	0.0	0.0	2.6	6.2	3.6	3.8	1.8	0.7
Cycle Q Clear(g_c), s	4.3	0.0	0.0	5.0	0.0	0.0	2.6	6.2	3.6	3.8	1.8	0.7
Prop In Lane	0.25		0.40	0.21		0.36	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	227	0	0	272	0	0	139	385	327	192	441	374
V/C Ratio(X)	0.73	0.00	0.00	0.72	0.00	0.00	0.72	0.69	0.43	0.77	0.20	0.08
Avail Cap(c_a), veh/h	668	0	0	822	0	0	287	724	613	325	764	647
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.00	1.00	0.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	19.4	0.0	0.0	18.7	0.0	0.0	20.9	17.1	16.1	20.2	14.2	13.8
Incr Delay (d2), s/veh	4.5	0.0	0.0	3.6	0.0	0.0	6.8	2.2	0.9	6.5	0.2	0.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.8	0.0	0.0	2.0	0.0	0.0	1.2	2.5	1.2	1.8	0.7	0.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	23.9	0.0	0.0	22.2	0.0	0.0	27.8	19.3	17.0	26.7	14.5	13.9
LnGrp LOS	C	A	A	C	A	A	C	B	B	C	B	B
Approach Vol, veh/h		166			196			506				266
Approach Delay, s/veh		23.9			22.2			20.4				21.3
Approach LOS		C			C			C				C
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	9.5	14.6		10.6	8.1	16.0		11.8				
Change Period (Y+Rc), s	4.5	5.0		4.5	4.5	5.0		4.5				
Max Green Setting (Gmax), s	8.5	18.0		18.0	7.5	19.0		22.0				
Max Q Clear Time (g_c+I1), s	5.8	8.2		6.3	4.6	3.8		7.0				
Green Ext Time (p_c), s	0.1	1.4		0.6	0.1	0.4		0.9				

Intersection Summary

HCM 6th Ctrl Delay	21.4
HCM 6th LOS	C

Intersection												
Int Delay, s/veh	11.1											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕	↗		↕		↖	↗		↖	↗	
Traffic Vol, veh/h	228	17	186	12	4	17	73	150	11	9	114	83
Future Vol, veh/h	228	17	186	12	4	17	73	150	11	9	114	83
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None									
Storage Length	-	-	25	-	-	-	50	-	-	40	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	90	90	90	90	90	90	90	90	90	90	90	90
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	253	19	207	13	4	19	81	167	12	10	127	92

Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	540	534	173	641	574	173	219	0	0	179	0	0
Stage 1	193	193	-	335	335	-	-	-	-	-	-	-
Stage 2	347	341	-	306	239	-	-	-	-	-	-	-
Critical Hdwy	7.12	6.52	6.22	7.12	6.52	6.22	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.12	5.52	-	6.12	5.52	-	-	-	-	-	-	-
Follow-up Hdwy	3.518	4.018	3.318	3.518	4.018	3.318	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	453	452	871	388	429	871	1350	-	-	1397	-	-
Stage 1	809	741	-	679	643	-	-	-	-	-	-	-
Stage 2	669	639	-	704	708	-	-	-	-	-	-	-
Platoon blocked, %								-	-	-	-	-
Mov Cap-1 Maneuver	417	422	871	271	400	871	1350	-	-	1397	-	-
Mov Cap-2 Maneuver	417	422	-	271	400	-	-	-	-	-	-	-
Stage 1	760	736	-	638	604	-	-	-	-	-	-	-
Stage 2	611	601	-	519	703	-	-	-	-	-	-	-

Approach	EB		WB		NB		SB	
HCM Control Delay, s	20.7		13.8		2.4		0.3	
HCM LOS	C		B					

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	EBLn2	WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1350	-	-	417	871	447	1397	-	-
HCM Lane V/C Ratio	0.06	-	-	0.653	0.237	0.082	0.007	-	-
HCM Control Delay (s)	7.8	-	-	28.5	10.4	13.8	7.6	-	-
HCM Lane LOS	A	-	-	D	B	B	A	-	-
HCM 95th %tile Q(veh)	0.2	-	-	4.5	0.9	0.3	0	-	-

Queues
3: PENRYN ROAD & WB RAMPS



Lane Group	EBT	WBT	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	172	219	86	219	201	321	16	61
v/c Ratio	0.59	0.64	0.27	0.65	0.47	0.78	0.03	0.11
Control Delay	36.6	36.4	37.2	41.1	11.8	45.5	22.1	0.6
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	36.6	36.4	37.2	41.1	11.8	45.5	22.1	0.6
Queue Length 50th (ft)	67	88	40	99	12	144	5	0
Queue Length 95th (ft)	135	163	93	186	65	#323	21	0
Internal Link Dist (ft)	600	465		573			882	
Turn Bay Length (ft)			50		50	75		25
Base Capacity (vph)	442	535	337	448	511	437	697	668
Starvation Cap Reductn	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.39	0.41	0.26	0.49	0.39	0.73	0.02	0.09

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

HCM 6th Signalized Intersection Summary
3: PENRYN ROAD & WB RAMPS

EXISTING AM PLUS PROJECT

10/15/2018



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↗	↖	↗	↖	↖	↗
Traffic Volume (veh/h)	25	74	48	34	92	60	73	186	171	273	14	52
Future Volume (veh/h)	25	74	48	34	92	60	73	186	171	273	14	52
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	29	87	56	40	108	71	86	219	201	321	16	61
Peak Hour Factor	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85	0.85
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	39	116	75	53	143	94	114	329	279	382	611	517
Arrive On Green	0.13	0.13	0.13	0.17	0.17	0.17	0.06	0.18	0.18	0.21	0.33	0.33
Sat Flow, veh/h	296	887	571	320	864	568	1781	1870	1585	1781	1870	1585
Grp Volume(v), veh/h	172	0	0	219	0	0	86	219	201	321	16	61
Grp Sat Flow(s),veh/h/ln	1753	0	0	1752	0	0	1781	1870	1585	1781	1870	1585
Q Serve(g_s), s	5.6	0.0	0.0	7.0	0.0	0.0	2.8	6.4	7.1	10.2	0.3	1.6
Cycle Q Clear(g_c), s	5.6	0.0	0.0	7.0	0.0	0.0	2.8	6.4	7.1	10.2	0.3	1.6
Prop In Lane	0.17		0.33	0.18		0.32	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	229	0	0	289	0	0	114	329	279	382	611	517
V/C Ratio(X)	0.75	0.00	0.00	0.76	0.00	0.00	0.75	0.67	0.72	0.84	0.03	0.12
Avail Cap(c_a), veh/h	535	0	0	654	0	0	257	571	484	559	611	517
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.00	1.00	0.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	24.7	0.0	0.0	23.5	0.0	0.0	27.1	22.7	22.9	22.2	13.5	13.9
Incr Delay (d2), s/veh	4.9	0.0	0.0	4.0	0.0	0.0	9.6	2.3	3.5	7.4	0.0	0.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.5	0.0	0.0	3.0	0.0	0.0	1.4	2.8	2.7	4.7	0.1	0.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	29.6	0.0	0.0	27.5	0.0	0.0	36.7	25.0	26.4	29.6	13.5	14.0
LnGrp LOS	C	A	A	C	A	A	D	C	C	C	B	B
Approach Vol, veh/h		172			219			506			398	
Approach Delay, s/veh		29.6			27.5			27.6			26.6	
Approach LOS		C			C			C			C	
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	17.2	15.4		12.2	8.3	24.3		14.2				
Change Period (Y+Rc), s	4.5	5.0		4.5	4.5	5.0		4.5				
Max Green Setting (Gmax), s	18.5	18.0		18.0	8.5	18.0		22.0				
Max Q Clear Time (g_c+I1), s	12.2	9.1		7.6	4.8	3.6		9.0				
Green Ext Time (p_c), s	0.5	1.3		0.6	0.1	0.2		1.0				

Intersection Summary

HCM 6th Ctrl Delay	27.5
HCM 6th LOS	C

Queues
3: PENRYN ROAD & WB RAMPS



Lane Group	EBT	WBT	NBL	NBT	NBR	SBL	SBT	SBR
Lane Group Flow (vph)	166	208	100	267	139	149	116	29
v/c Ratio	0.53	0.59	0.49	0.66	0.31	0.62	0.22	0.05
Control Delay	27.6	27.7	40.2	32.8	7.5	44.1	23.2	0.2
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	27.6	27.7	40.2	32.8	7.5	44.1	23.2	0.2
Queue Length 50th (ft)	47	60	37	94	1	56	36	0
Queue Length 95th (ft)	114	136	#112	199	44	#170	91	0
Internal Link Dist (ft)	600	465		573			882	
Turn Bay Length (ft)			50		50	75		25
Base Capacity (vph)	528	641	213	538	553	241	587	592
Starvation Cap Reductn	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.31	0.32	0.47	0.50	0.25	0.62	0.20	0.05

Intersection Summary

95th percentile volume exceeds capacity, queue may be longer.
Queue shown is maximum after two cycles.

HCM 6th Signalized Intersection Summary
3: PENRYN ROAD & WB RAMPS

EXISTING PM PLUS PROJECT

10/15/2018



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↗	↖	↗	↖	↖	↗
Traffic Volume (veh/h)	37	53	59	38	75	75	90	240	125	134	104	26
Future Volume (veh/h)	37	53	59	38	75	75	90	240	125	134	104	26
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	41	59	66	42	83	83	100	267	139	149	116	29
Peak Hour Factor	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90	0.90
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	56	81	90	58	114	114	138	383	324	192	440	373
Arrive On Green	0.13	0.13	0.13	0.17	0.17	0.17	0.08	0.20	0.20	0.11	0.24	0.24
Sat Flow, veh/h	426	613	686	349	690	690	1781	1870	1585	1781	1870	1585
Grp Volume(v), veh/h	166	0	0	208	0	0	100	267	139	149	116	29
Grp Sat Flow(s),veh/h/ln	1726	0	0	1729	0	0	1781	1870	1585	1781	1870	1585
Q Serve(g_s), s	4.4	0.0	0.0	5.4	0.0	0.0	2.6	6.3	3.6	3.9	2.4	0.7
Cycle Q Clear(g_c), s	4.4	0.0	0.0	5.4	0.0	0.0	2.6	6.3	3.6	3.9	2.4	0.7
Prop In Lane	0.25		0.40	0.20		0.40	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	227	0	0	286	0	0	138	383	324	192	440	373
V/C Ratio(X)	0.73	0.00	0.00	0.73	0.00	0.00	0.73	0.70	0.43	0.78	0.26	0.08
Avail Cap(c_a), veh/h	655	0	0	802	0	0	282	710	602	319	750	635
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.00	1.00	0.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	19.8	0.0	0.0	18.8	0.0	0.0	21.4	17.5	16.4	20.6	14.8	14.1
Incr Delay (d2), s/veh	4.5	0.0	0.0	3.5	0.0	0.0	7.1	2.3	0.9	6.6	0.3	0.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	0.0	2.2	0.0	0.0	1.3	2.6	1.2	1.8	0.9	0.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	24.3	0.0	0.0	22.3	0.0	0.0	28.5	19.8	17.3	27.1	15.1	14.2
LnGrp LOS	C	A	A	C	A	A	C	B	B	C	B	B
Approach Vol, veh/h		166			208			506				294
Approach Delay, s/veh		24.3			22.3			20.8				21.1
Approach LOS		C			C			C				C
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	9.6	14.7		10.7	8.2	16.2		12.4				
Change Period (Y+Rc), s	4.5	5.0		4.5	4.5	5.0		4.5				
Max Green Setting (Gmax), s	8.5	18.0		18.0	7.5	19.0		22.0				
Max Q Clear Time (g_c+I1), s	5.9	8.3		6.4	4.6	4.4		7.4				
Green Ext Time (p_c), s	0.1	1.4		0.6	0.1	0.5		1.0				

Intersection Summary

HCM 6th Ctrl Delay	21.6
HCM 6th LOS	C