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RESPONSES TO COMMENTS

This chapter contains responses to each of the comment letters submitted regarding the Whitehawk I & II Projects 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



Development Services Department
311 Vernon Street
Roseville, California 95678-2649
"Working Together to Build a Quality Community"

January 14, 2019

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

Subject: Whitehawk I & II Subdivisions Project - Draft EIR Comments

Dear Ms. Herrington:

The City appreciates the opportunity to review and comment on the Draft Environmental Impact Report (EIR) prepared for the Whitehawk I & II Subdivisions Project. The following was included in the City's February 26, 2018 NOP comment letter:

The City of Roseville requests project traffic impacts to the existing Sierra College Boulevard/Douglas Boulevard intersection be evaluated as part of the EIR's transportation analysis. The City is concerned that this intersection's existing level of service will continue to worsen with addition of vehicle trips generated by this and other pending projects proposed east of Sierra College Boulevard.

1-1

Due to existing capacity constraints on eastbound Douglas Boulevard at Sierra College Boulevard, the PM peak hour is experiencing severe congestion. Without mitigation, adding new PM peak vehicle trips to this intersection will cause additional delay and congestion. Much of the problem is due to underutilization of the outside through lane as a result of the lane drop from 3 to 2 lanes immediately east of Sierra College Blvd. Vehicles tend to avoid this lane due to the immediate lane drop once they are through the intersection. Extending the outside lane past Woodgrove Way would encourage greater use of the outside through lane, increasing intersection capacity, and move the merge point beyond the Douglas/Sierra College intersection. This improvement should be considered with any increase in trip generation to the east of the intersection. The City understands the County is in the process of updating the Granite Bay Community Plan Circulation Element and CIP. The City requests the above, or other similar appropriate mitigation, be identified in the Whitehawk Projects EIR and/or Circulation Element Update as a high priority CIP improvement.

1-2

DEIR mitigation measure 14.3 addresses this impact, and the City is strongly supportive of the construction of the improvements as identified at the earliest possible date. Of concern is the notation that the improvements are not included in the GBCP Circulation Element, is not supported by the local community, and therefore the impact would remain significant and unavoidable. CEQA §21002 requires public agencies to implement feasible mitigation measures which would substantially lessen the significant impacts of a project. The fact that the improvements as described in Mitigation Measure 14.3 are not identified in the Granite Bay Community Plan, and there is a lack of community support, does not render the mitigation measure infeasible.

1-3

Clarification is needed as to the extent to which, or if at all, mitigation measure 14.3 will actually be implemented. Clear improvement trigger events or dates would help remove any ambiguity regarding the completion of the work.

**Letter 1
Cont'd**

Should the County have any questions concerning these comments, please don't hesitate to contact Jason Shykowski, Principal Engineer, with the Roseville Public Works Department at (916) 77 4-5348.

Sincerely,


Terri Shirhall
Acting Environmental Coordinator

LETTER 1: TERRI SHIRHALL, CITY OF ROSEVILLE

Response to Comment 1-1

The comment summarizes the commenter's letter on the Notice of Preparation for the proposed project, specifically related to analysis of the Sierra College Boulevard/Douglas Boulevard intersection. Responses to specific concerns raised by the commenter are provided below.

Response to Comment 1-2

In response to this comment, it is important to emphasize that the traffic analysis evaluates three existing plus project scenarios: 1) development of Whitehawk I (WHI) only; 2) development of Whitehawk II (WHII) only; and 3) development of both WHI and WHII. Impact 14-3 of the Draft EIR evaluates study roadway segment impacts that would result from each of these scenarios. The results will be summarized to clarify the Draft EIR conclusions for the commenter.

WHI Only

The Draft EIR concludes that no significant roadway segment impacts would occur under the WHI only scenario (pg. 14-50).

WHII Only

Woodgrove Way to Seeno Avenue. The Draft EIR concludes that one significant roadway segment impact would occur under the WHII only scenario – Douglas Boulevard from Woodgrove Way to Seeno Avenue (pg. 14-52). This portion of Douglas Boulevard would experience an increase of 440 average daily trips (ADT) over four lanes as a result of the WHII project, thus triggering the County's threshold of significance of 100 ADT per lane. The Draft EIR states that widening the portion of Douglas Boulevard from Woodgrove Way to Seeno Avenue from four to six lanes would mitigate the impact; however, the Granite Bay Community Plan (GBCP) Circulation Element establishes that Douglas Boulevard shall remain a four lane roadway from Cavitt Stallman Road South, east to Auburn Folsom Road (Draft EIR, pg. 14-55; see also Table 9.7-1A, Recommended Future Design Characteristics, of the GBCP Circulation Element). As a result of the Community Plan policies related to ultimate infrastructure configuration of Douglas Boulevard east of Cavitt Stallman Road South, Placer County has not identified or collected funding associated with widening the roadway to six lanes. For this reason, the mitigation measure to widen the portion of Douglas Boulevard from Woodgrove Way to Seeno Avenue from four to six lanes has been determined to be infeasible. As a result, the WHII only impact along Douglas Boulevard, from Woodgrove Way to Seeno Avenue is determined to be significant and unavoidable.

The segment Level of Service methodology presented in the DEIR utilizes the Average Daily Traffic (ADT) information as presented in the Placer County General Plan. In an effort to provide an alternative picture of the segment LOS on Douglas Boulevard between Woodgrove Way and Seeno Avenue, the following analysis is provided which utilizes current Highway Capacity Manual methodology which bases the finding of LOS off of Free Flow Speed, or vehicle speeds.

The table below provides the findings from the Highway Capacity Manual analysis. The roadway segment of Douglas Boulevard from Woodgrove Way from Seeno Avenue performs within the LOS C threshold.

Douglas Blvd: Cavitt Stallman Rd. S to Seeno Ave.		Travel Speed	%BFFS	LOS
Existing	Eastbound	51	83%	A
	Westbound	46	74%	C
Existing + WH I	Eastbound	51	82%	A
	Westbound	46	74%	C
Existing + WH II	Eastbound	47	76%	B
	Westbound	46	74%	C
Existing + WH I & II	Eastbound	47	76%	B
	Westbound	46	74%	C
Cumulative No Project	Eastbound	51	82%	A
	Westbound	45	72%	C
Cumulative + WH I	Eastbound	51	82%	A
	Westbound	45	72%	C
Cumulative + WH II	Eastbound	47	75%	C
	Westbound	45	72%	C
Cumulative + WH I & II	Eastbound	47	75%	B
	Westbound	45	72%	C

Although the Highway Capacity Manual Free Flow Speed methodology is not the current standard set forth in the Placer County General Plan or the Granite Bay Community Plan, it demonstrates a technical basis for consideration of infrastructure need in this segment of Douglas Boulevard east of Cavitt Stallman Road South. based on the most current industry analysis methodology at the date of publication of this document. Furthermore, Placer County Department of Public Works is currently in the process of updating the Granite Bay Community Plan Circulation Element, in which the LOS standards and methodologies used to set those standards will be evaluated.

WHI and WHII Combined

Sierra College Boulevard to Seeno Avenue. The Draft EIR concludes that if both the WHI and WHII projects were developed, the segment of Douglas Boulevard from Sierra College Boulevard to Seeno Avenue would experience a significant impact due to traffic from both projects. The ultimate significance conclusion, however, is different, depending upon the segment in question, as demonstrated below.

Sierra College Boulevard to Cavitt Stallman Road South

The Draft EIR determines that it is feasible to widen this portion of Douglas Boulevard from four to six lanes (Draft EIR, pg. 14-56). This is based on the following factors: Unlike the segments of Douglas Boulevard east of Cavitt Stallman Road South, the GBCP Circulation Element recommends the widening of Douglas Boulevard, from Sierra College Boulevard to Cavitt Stallman Road South, to six lanes (see Table 9.7-1A, Recommended Future Design Characteristics, of the GBCP Circulation Element). In addition, this

widening improvement is included in the Granite Bay Benefit District of the Placer County Countywide CIP (August 2017).

As a result, the Draft EIR includes Mitigation Measure 14-3, which requires the widening of Douglas Boulevard from Sierra College Boulevard to Cavitt Stallman Road South, and determines this mitigation to be feasible and fully implementable. Thus, the ultimate conclusion for this segment of Douglas Boulevard is less than significant. It is important to note, however, that the language of the mitigation measure recognizes that, because this is an impact triggered only by both the WHI and WHII projects combined, this improvement shall be required with the development of the second of the two Whitehawk projects. Further, since projects other than the second of the two WHI and WHII projects to be developed could trigger the requirement for widening of Douglas Boulevard from Sierra College Boulevard to Cavitt Stallman Road South, the mitigation measure language recognizes that if this improvement has been previously constructed by another project, then the project's obligation for constructing this improvement shall be considered satisfied.

Cavitt Stallman Road South to Seeno Avenue

This is the portion of Douglas Boulevard impacted under the WHI and WHII scenario that the Draft EIR determines is infeasible to widen based on the above-described factors (Draft EIR, pg. 14-59). Thus, the ultimate conclusion for this segment of Douglas Boulevard is significant and unavoidable.

Response to Comment 1-3

Please see Response to Comment 1-2.

Letter 2



110 Maple Street, Auburn, CA 95603 • (530) 745-2330 • Fax (530) 745-2373 • www.placer.ca.gov/apcd

Erik C. White, Air Pollution Control Officer

January 14, 2019

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

SENT VIA : SHerrington@placer.ca.gov

SUBJECT: Whitehawk I and Whitehawk II Draft EIR

Dear Ms.Herrington;

2-1 Thank you for submitting the Whitehawk I and Whitehawk II Draft EIR (Project) to the Placer County Air Pollution Control District (District) for review. The District recommends consideration of the following item.

2-2 Based on the CalEEMod's model analysis in the Air Quality Appendix, of the Draft EIR, assumed that there are no wood burning appliances to be installed for this project. To ensure that the project's related air quality and GHG impact remains less than significant the following condition should be included in the project condition of approval and explicitly stated in the project's Covenants, Conditions and Restrictions (CC&R).

Wood burning appliances, including fireplaces and woodstoves, shall not be installed within the residential units. Any permanent built in indoor or outdoor fireplace or stove shall be fueled by natural gas and be clearly delimited on the floor plans for all the building permits.

Thank you for allowing the District this opportunity to review the project. Please do not hesitate to contact me at 530.745.2327 or ahobbs@placer.ca.gov if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Hobbs".

Ann Hobbs
Associate Planner
Planning & Monitoring Section

LETTER 2: ANN HOBBS, PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

Response to Comment 2-1

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

Response to Comment 2-2

The County would require, as a condition of approval, that the Covenants, Conditions, and Restrictions (CC&R) for the WHI and WHII projects prohibit installation of wood burning appliances within the proposed residential units.

Letter 3

January 11, 2019

MEMORANDUM

TO: Placer County Planning Commission

FROM: Strap Ravine Estates Property Owners Association

RE: Proposed Emergency Vehicle Access to Whitehawk II

3-1

Strap Ravine Estates is a subdivision governed by Covenants, Conditions, and Restrictions (“CC&Rs”) directly to the southeast of the proposed Whitehawk II project; several Member parcels will share a common property line with the proposed development. The Strap Ravine Estates Property Owners Association (“Association”) has become aware of a proposed Emergency Vehicle Access (“EVA”) route described throughout the November 2018 draft Environmental Impact Report (“EIR”), but most clearly on pages 3-19 and 3-21. The EVA is proposed to be a 20’ wide, 500’ long access road on the east side of Whitehawk II, south of lot 45, extending within a 25’ wide easement meandering generally southeast through APN 048-142-006, which is a Member parcel within the Association, hereafter “the Wringer parcel,” and terminating at Quartzite Circle, which is a privately-maintained public road supported by annual assessments levied on Association Members. This EVA is unchanged throughout the Chapter 18 discussion of alternatives in both the “buildout pursuant to existing zoning” alternative and the “reduced density” alternative.

3-2

The Association has several concerns relating to this proposal, including maintenance impacts to Quartzite Circle, which is the financial responsibility of the Association, and the possibility that the EVA may become an attractive nuisance to increased pedestrian and other non-motorized through traffic, or unauthorized use of the neighboring vacant Member parcel directly to the south of the proposed EVA through the Wringer parcel. Most importantly, however, the Association believes that the draft EIR incorrectly states that “...the proposed EVA routes would not conflict with any land use restrictions” because the underlying easement and the proposed EVA are inconsistent with the CC&Rs that bind the Wringer parcel and other Association Members. Specifically, Article VIII, General Restrictions, Section 1, “Single Family Dwellings” reads in relevant part:

...and no portion of said property shall be used for any purpose other than for single family dwelling purposes.

3-3

Further, Article VIII, General Restrictions, Section 11, “Businesses” reads in relevant part:

No form of business, commercial, manufacturing, (or) storage enterprise activity shall be conducted or maintained in this subdivision.

These are enforceable land use restrictions. An access road through the Wringer parcel to a third-party property is not consistent with “single family dwelling purposes” and an easement sold by the owners of the Wringer parcel for monetary gain is a prohibited “commercial activity.” The Association understands that the owners of the Wringer parcel have sold an easement for EVA purposes but does not know the current status of said easement. The Association has not been approached for permission by either the owners of the Wringer parcel or the Applicant, and believes the EVA as proposed is inappropriate for our community and directly contrary to our CC&Rs. **The Association’s position is that there should be no EVA to Whitehawk II through Quartzite Circle.** The Association has initiated

**Letter 3
Cont'd**

**3-3
cont'd**

↑ enforcement action against the owners of the Wringer parcel and reminds the Planning Commission that this issue has been brought up repeatedly throughout this process, most recently at the December 13, 2018 Planning Commission hearing.

Respectfully submitted on behalf of the Association at the direction of the Board of Directors, permission effective 12/10/2018, by JEFFREY M CARAVELLI, an Association Member.

END OF DOCUMENT

LETTER 3: STRAP RAVINE ESTATES PROPERTY OWNER’S ASSOCIATION

Response to Comment 3-1

The County agrees that this is a privately-maintained public road (the final parcel map offers “for dedication to the public for road purposes the roads shown hereon...”). Pursuant to South Placer Fire District requirements for dead-end roads, an EVA would also be required in both the “Buildout Pursuant to Existing Zoning” and the “Reduced Density” alternatives shown in Chapter 18 of the Draft EIR.

Response to Comment 3-2

The WHII HOA would be responsible for the ongoing maintenance of the EVA, gates, and signage. The design of the EVA is proposed to use a “Grasscrete” type of system rather than pavement and would allow the surface to be covered with grasses to help conceal the EVA. Additionally, the location and types of gates and fencing are intended to minimize the likelihood of the EVA becoming an attractive nuisance. An additional tube steel triangular-shaped barrier gate would be located across the existing sewer easement road installed at the southeast corner of WHII.

Response to Comment 3-3

The EVA provides a safety feature for the proposed Whitehawk II project as well as the existing Quartzite Circle residents. The EVA would serve residents of either neighborhood in the event of a future emergency which might result in the need for an alternative evacuation route.

Letter 4

Shirlee Herrington

Subject: Whitehawk I and II DEIR is Available for Public Review and Comment

From: Cheryl Berkema [<mailto:cheryl.berkema@gmail.com>]
Sent: Friday, November 30, 2018 10:24 AM
To: Christopher Schmidt; EJ Ivaldi
Cc: Cheryl Berkema
Subject: Re: Whitehawk I and II DEIR is Available for Public Review and Comment

Hello EJ,

4-1 I made a request to Chris Schmidt to ask you to respectfully move this project into the new year. This project has been going on for years and to ask residents during a time of religious holidays to bear the burden of reviewing the lengthy DEIR is unacceptable. I did not receive a response from Chris on your response.

4-2 The traffic circulation document is a mandatory dependency for this project as amendments are being requested. The traffic circulation document has not been released for public review. The circulation element was supposed to include regional traffic impacts. Douglas is a major thoroughfare in Granite Bay, traffic will be a significant impact. The previous traffic study was also deemed faulty by an independent engineering evaluation, all the more reason for releasing the document for public review. To state that the circulation "modeling" was used is insufficient. Planning owes the public the study. The traffic study should be released prior to the evaluation of the WhiteHawks DEIR.

4-3 As I mentioned at the NOP meeting previously, the sewer study is also a prerequisite for the project.

4-4 Again, I ask that the DEIR and hearing be moved to the new year to respect the religious holidays and for the release of the traffic circulation study and sewer study prior to the WhiteHawks DEIR.

Best Regards,
Cheryl

LETTER 4: CHERYL BERKEMA, LETTER 1 OF 5

Response to Comment 4-1

The County has elected not to extend the public comment period for the Draft EIR beyond the State-mandated minimum 45-day period.

Response to Comment 4-2

A number of approved and proposed projects have required, or will require, a General Plan Amendment. The proposed land development projects that have requested a General Plan Amendment include the WHI and WHII projects, Granite Bay Medical Complex (on-hold), Hawk Homestead (withdrawn), Granite Rock Estates (on-hold), Quarry Ridge Professional, and Amazing Facts Residential (pre-development meeting only). These and other pending (or potential) projects have been incorporated into the land use assumptions used for the traffic modeling efforts.

Fehr & Peers, the traffic consultant working on the Granite Bay Circulation Element update and cumulative modeling, prepared the Transportation Impact Study for the WHI and WHII projects. The cumulative traffic model prepared for the Circulation Element update was used to analyze traffic impacts from the WH projects and other proposed Granite Bay projects that are currently under review by the County. The data and modeling platform is consistent across the projects and the cumulative update. Review of individual projects were designed to track together concurrently.

The technical analysis performed by the consultant team identified future traffic volumes and projected regional growth including: anticipated increased traffic, approved, pending, and known projects in the GBCP area, and potential development in Granite Bay based on underlying zoning and the Placer County General Plan land use designations. The future improvements to the transportation network are also incorporated. These improvements are primarily based on the SACOG 2016 MTP/SCS Tier 1 project list and the Granite Bay Capital Improvement Project (CIP) list. The Tier 1 project list includes transportation enhancements and expansions to the roadway, transit, and bicycle and pedestrian facilities in the SACOG region that are expected to occur over the life of the plan (by 2036).

Response to Comment 4-3

The sewer analysis within the Draft EIR relied on best available data for the Granite Bay (SMD 2) sewer system¹ and future development projections. This approach enabled the County to accurately determine whether the projects will result in the need to expand the existing sewer system, as further discussed in Response to Comment 17-18 below.

^{4##} This includes primarily the *Technical Memorandum: Hydraulic Model Analysis* (February 25, 2011), prepared by Brown and Caldwell.##

Response to Comment 4-4

The comment is a concluding statement summarizing the concerns discussed above.

Letter 5

From: Shannon [<mailto:shannoncts@gmail.com>]
Sent: Thursday, December 6, 2018 8:33 AM
To: Christopher Schmidt <CRSchmid@placer.ca.gov>
Subject: Whitehawk I and II DEIR

Chris,

In quickly reviewing the DEIR for Whitehawk I and II, I am concerned with the length 747 pages in total.

As I am sure you are aware per 15141:

15141. Page Limits

The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21100, Public Resources Code.

5-1

Discussion: The recommended page limits encourage agencies to reduce unneeded bulk in EIRs and to help the documents disclose the key environmental issues to the decision-makers and the public. Further, the page limits match the page limits under the federal system. Adopting the same limits as used in the federal system improves compatibility of the two systems.

Several community members expressed concern over the volume of data at last night's MAC meeting. There really does not appear to be extreme complexity to this development that warrants more than doubling the requirement. It seems that in trying to allow each project to stand on its own, which it should not, that the County has made it much more convoluted than need be which defeats the requirement of CEQA to begin with.

At minimum the request for deference to the holiday and due to 747 pages, more than a doubling of the page limit, an extension of the review time at minimum is warranted. Thank you for your consideration.

LETTER 5: SHANNON QUINN, LETTER 1 OF 3

Response to Comment 5-1

The CEQA Guidelines do not include a mandatory page limit for EIRs. The page limits noted in Section 15154 are guidelines, rather than strict standards. The length of the Draft EIR is reflective of the depth of analysis necessary to review separate and combined approval of both the WHI and WHII projects at an appropriate level of detail and address concerns voiced by the public during the NOP public review period for the proposed projects.

The County has elected not to extend the public comment period for the Draft EIR beyond the State-mandated minimum 45-day period.

Letter 6

From: Shannon [<mailto:shannoncts@gmail.com>]
Sent: Thursday, December 6, 2018 12:01 PM
To: Christopher Schmidt <CRSchmid@placer.ca.gov>
Subject: Request for extension to 45 day comment period- WH I & II

Chris,

Please consider this a formal request for an extension of the 45 day comment period for the Whitehawk I & II DEIR.

6-1

This DEIR is a compilation of more than 747 pages which doesn't even begin to include the appendices. The traffic appendix is 402 pages in of itself. Considering that CEQA compliance states that, "the text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300 pages." It would be a fair argument that because the volume of pages is more than double it should equate to a doubling of time for review or at minimum some extension of it.

Also in deference to the religious holiday season for many residents, it is a reasonable request to make to allow for a more thorough review of these very lengthy and detailed documents.

Please consider this part of the official record.

Thank you for your consideration.

Sincerely,
Shannon Quinn

LETTER 6: SHANNON QUINN, LETTER 2 OF 3

Response to Comment 6-1

Please see Response to Comment 5-1.

Letter 7

Shirlee Herrington

From: Larissa Berry <lzberry@peoplepc.com>
Sent: Sunday, December 09, 2018 1:15 PM
To: Christopher Schmidt
Cc: gbca@granitebay.com; defendgb@gmail.com; allianceforenviroleadership@gmail.com; Shirlee Herrington
Subject: Request for extension of WHI, II DEIR

Good morning Chris,

7-1 Please consider this a formal request to extend the public review and comment period for Whitehawk I and II beyond the minimum 45 days.

7-2 The DEIR far exceeds the CEQA recommended 300 pages. As such, it is fair argument to assume that there must be significant impacts which require this volume of information. Based on the timing of the release, in such close proximity to the holidays, an unfair burden is being placed on those residents who wish to comment.

Thank you in advance
Larissa

Sent from my iPhone

LETTER 7: LARISSA BERRY, LETTER 1 OF 3

Response to Comment 7-1

Please see Response to Comment 5-1.

Response to Comment 7-2

Please see Response to Comment 5-1.

Letter 8

Shirlee Herrington

Subject: FW: Whitehawk I and II DEIR is Available for Public Review and Comment

From: Cheryl Berkema [<mailto:cheryl.berkema@gmail.com>]
Sent: Monday, December 10, 2018 12:16 PM
To: EJ Ivaldi
Cc: Leigh Chavez; Shirlee Herrington; Christopher Schmidt
Subject: Re: Whitehawk I and II DEIR is Available for Public Review and Comment

Hello EJ,

Thank you for your response. Please consider the following formal requests from Placer Planning:

8-1

1. The WhiteHawks DEIR far exceeds what is allowed for review for getting Federal Documents on the registry (300 pages is allowed). Supervisor Uhler stated at the last MAC meeting in December that a waiver had to be granted for the 900 page Placer County Conservation Plan (PCCP). The excessive size of the WhiteHawks DEIR and significant appendices calls for at least double the amount of time for public review. Please consider this a formal request to lengthen the amount of time the public has to review the document due to the excessive size of the document and the timing over the holidays.

8-2

2. As has been raised at several public meetings by multiple individuals, the applicants for the WhiteHawks projects have not been the presenters for the projects. Planning has spent significant resource in the research, preparation, and presentation of WhiteHawks projects over the past couple years. The public website, Placer newsletter updates, numerous public presentations, project research involving multiple agencies and project preparation of such huge documents representing WhiteHawks would suggest that Placer Planning is actively promoting WhiteHawks. The WhiteHawks projects are requesting amendments to the Granite Bay Community Plan and multiple entitlements yet offer no benefit to the community. Please provide the total amount of hours spent on the WhiteHawks projects since the application and the total amount the applicants have been billed for the WhiteHawks to date. With all of the needs in Placer County such as affordable housing, traffic improvements, water, and sewer improvements the public deserves to know why such energies are being expended for the benefit of the WhiteHawks applicants.

Thank you for your consideration,
Cheryl Berkema

LETTER 8: CHERYL BERKEMA, LETTER 2 OF 5

Response to Comment 8-1

Please see Response to Comment 5-1 above. Please note that the Draft EIR is an environmental document prepared pursuant to the State CEQA Guidelines. As such, the Draft EIR is not subject to federal page limits.

Response to Comment 8-2

The commenter requests information from the County regarding the processing of the project, and does not address the adequacy of the Draft EIR. This comment has been forwarded to the decision-makers.

Letter 9

From: Stanley Ohara [mailto:stanchara@icloud.com]
Sent: Tuesday, December 11, 2018 5:20 PM
To: Christopher Schmidt <CRSchmid@placer.ca.gov>
Subject: Whitehawk I and II

- 9-1** (1) I recommend that the Applicant evaluate a lower density alternative rather than the No Build option. A lower density alternative would achieve all goals and objectives with fewer significant and unavoidable impacts as well as conform to the rural nature of Granite Bay.
- 9-2** (2) The requested 50% coverage variance should be denied since this is a self-induce variance. a) The Applicant has CHOSEN to reduce the parcel size and as such this would be the granting of special privileges within the zoning district in direct violation of CEQA and CA Gov 65852. b) The reduced parcel size appears to be a "math game" to qualify for a density bonus. Under CEQA, the profitability of a project is not grounds for granting a self-induced variance. c) There is no special feature of this parcel that prohibits the applicant from constructing the project as zoned or even as proposed without the granting of the density bonus. This would eliminate the need for a coverage variance.
- 9-3** (3) The analysis of the As Zoned project is incorrect when it states that Granite Bay already has adequate homes on 1 acre parcels and the project is providing a housing mix. a) The Granite Bay Community Plan has certified Housing and Land Use elements which clarify the appropriate mix of homes to maintain the rural quality of Granite Bay. b) To maintain the rural quality of Granite Bay, projects are encouraged to develop UNDER zoning requirements. c) **9-4** By shifting to higher density, smaller parcel size homes, the project in conjunction with recently approved higher density projects, will shift the balance of the Housing and Land Use elements
- 9-5** (4) South of Douglas to Eureka is defined in the Granite Bay Community Plan as Rural. Approving higher density, small parcel homes would be in direct violation and amount to a re-writing of the Granite Bay Community Plan which can only be done through voter approval. The Plan was recertified in 2012 as such, the alternative to be approved must be the As Zoned.
- 9-6** (5) It is my understanding from residents adjacent to the project, that they are not willing to grant an easement for use of Quartzite as a Secondary EVA.
- 9-7** (6) The project fails to provide adequate transitions to immediately adjacent and contiguous parcels as required by CEQA, GBCP and the PCGP.
- 9-8** (7) The sewer capacity study as well as traffic studies have not been completed and as such impacts cannot be gauged by the community
- 9-9** (8) The project merits no statement of overriding consideration since the proposal is not for the benefit of the community, alters the housing mix in violation of the community plan and is a "spot" rezone within a designated rural district

Regards,
Stan and Janis Ohara
8560 Quail Oaks Dr
Granite Bay

Sent from my iPad

LETTER 9: STAN AND JANIS OHARA

Response to Comment 9-1

As noted on page 18-21 of the Draft EIR, the No Project (No Build) Alternative evaluated in the Draft EIR would be considered a “no build” alternative, wherein the existing environmental setting is maintained. Thus, development at a lower density than the No Project (No Build) Alternative is not possible. Please note that the Buildout Pursuant to Existing Zoning Alternative and Reduced Density Alternative presented in the Draft EIR both represent buildout of the project sites at a reduced density compared to the proposed projects.

Response to Comment 9-2

The layout of the project is designed to maximize natural resource preservation. As originally designed, single-family homes were to be constructed within individual building envelopes of approximately 4,500 to 4,875 square feet (sf) each and a 1,200- to 1,300-sf private residential courtyard. The residential courtyards were not contained within the building envelopes; they were located within a private use easement within the open space/common area. The nearby Greyhawk II and III projects utilize a similar layout.

Subsequent to the circulation of the WHI and WHII Mitigated Negative Declarations, based on market feedback the project developer decided to redesign the project to retain the existing layout but to provide private yards for each unit. The result is not a typical residential subdivision, but a clustered development of homes on “small” (i.e., averaging approximately ¼-acre) lots. The County’s Planned Residential Development regulations are less restrictive in terms of lot size in order to provide flexibility to the land planner in the design of projects which can often result in greater compliance with the goals and policies of the GBCP. The resulting lot sizes range from 9,049 to 16,639 sf in WHI and from 9,007 to 14,501 sf in WHII.

The County’s lot coverage limitations are designed to ensure that lots are not overdeveloped but can impede single-story home construction on smaller lots. Per Sections 17.44.010 and 17.52.040 of the Placer County Code, Planned Residential Development projects are limited to site coverage restrictions of 25 percent maximum for lots 15,000 to 17,000 sf in size, 30 percent maximum for single-story residences on lots 10,000 to 15,000 sf, and 40 percent maximum for single-story residences on lots less than 10,000 sf. The proposed projects would require a Variance to increase the allowable building coverage to 50 percent to allow construction of single-story residences on all of the proposed lots. The proposed increase would allow for development of the WHI and WHII sites at the proposed densities without necessitating the development of two-story homes. By limiting the proposed homes to single-story elevations, the proposed projects would minimize the potential for land use incompatibilities with existing lower density residential development in the project area.

Specific reasons that constitute special circumstances or a hardship upon a parcel are acceptable for the granting of a Variance. Those reasons for the WHI and WHII projects include exceptional topographic conditions including on-site wetlands, the Strap Ravine corridor, and the required 300-foot residential setback along the south side of Douglas Boulevard.

The purpose of Variances is to provide procedures for the adjustment from the development standards of the Placer County Zoning Ordinance only when, because of special circumstances applicable to the property, including location, shape, size, surroundings, or topography, the strict application of the Zoning Code denies the property owner privileges enjoyed by other property owners in the vicinity and under identical zoning districts. Any Variance granted is subject to conditions that will ensure that the Variance does not constitute a granting of special privilege(s) inconsistent with the limitations upon other properties in the vicinity and zoning district in which the property is situated.

The Placer County Zoning Ordinance has specific findings that must be made when granting a Variance; the criteria is set forth in California Government Code Section 65906 and listed in Section 17.60.100 of the Zoning Ordinance. According to state law, a Variance must be limited solely to the physical circumstances of the property and is only for use in unusual, individual circumstances creating an unnecessary hardship for the applicant if the usual zoning standards were imposed.

The comment does not specifically address the adequacy of the Draft EIR. The physical environmental impacts of the proposed projects were analyzed in compliance with CEQA. The decision-makers will make the ultimate determination as to whether the findings for granting a variance can be made.

Response to Comment 9-3

The point of reference in the Draft EIR to which the commenter is referring is not clear. It is noted that page 18-24 of the Draft EIR states the following regarding the Buildout Pursuant to Existing Zoning Alternative:

[...] Granite Bay includes a larger number of large-lot and rural type developments, and the Buildout Pursuant to Existing Zoning Alternative would add to this existing stock without providing housing diversity as sought in project objective 8. [...]

The comment does not specify why the analysis presented in the Draft EIR regarding the Buildout Pursuant to Existing Zoning Alternative is deficient, noting only disagreement with the conclusions the Draft EIR reaches. Thus, a detailed response to the comment cannot be provided.

Response to Comment 9-4

The comment refers to maintaining the same mix of housing types identified in the GBCP to maintain the rural character of the community. In *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, the Appellate Court evaluated whether community character is a consideration in CEQA and whether changes to community character or social impacts constitute an environmental impact under CEQA. The Court determined CEQA does not require an analysis of subjective psychological feelings or social impacts. Rather, CEQA's overriding and primary goal is to protect the physical environment. CEQA defines a "significant effect on the environment" as "substantial, or potentially substantial, adverse changes in physical conditions" (PRC section 21100. subd. (d)). The comment will be forwarded to the decision-makers for consideration.

Response to Comment 9-5

Rather than addressing the adequacy of the Draft EIR, the comment is a policy consideration for the decision-makers as it raises concerns about the proposed higher density WHI and WHII projects, for which an amendment to the General Plan/GBCP is required. It is noted that such an amendment does not require voter approval, as the commenter suggests. General Plan or Community Plan amendments are discretionary actions that require approval from the legislative body, in this case, the Placer County Board of Supervisors. CEQA requires an EIR discuss inconsistencies with applicable plans (CEQA Guidelines Section 15125(d)). Although not required by CEQA, this EIR also discusses consistencies of the proposed projects with applicable General and Community Plan objectives, goals and policies. However, the final determination of whether the proposed projects would be consistent with Placer County General Plan and GBCP rests with the Board of Supervisors as the decision-making body. Thus, to the extent that a commenter disagrees with the EIR's consistency discussion, the comment is noted. However, the Final EIR does not resolve any such disagreements with General Plan or Community Plan goals and policies because the same is beyond the scope of a response to comments under CEQA. The Final EIR, including the commenters' disagreements regarding issues of plan inconsistency will be forwarded to the Planning Commission and Board of Supervisors for consideration during their respective deliberations on the proposed projects.

Response to Comment 9-6

Please see Response to Comment 3-3.

Response to Comment 9-7

Transitions between land uses is a planning consideration not a direct CEQA consideration. The extent to which transitions require evaluation under CEQA is limited to whether transitions are adequate to ensure no adverse physical environmental impacts would occur from the placement of one land use next to another. The evaluation of whether the placement of the proposed single-family homes next to other rural residential uses would result in physical environmental impacts is addressed throughout the technical chapters of the Draft EIR. The Draft EIR determined that all such potential impacts, as noted in GBCP Policy 3.2 (Specific Policies for Intensity of Use, 4 – noise, traffic, night lighting) could be reduced to less-than-significant levels with mitigation.²

Notwithstanding the above, the Draft EIR includes a planning-level discussion of transitions between the proposed projects and adjacent uses on pp. 11-20 and 11-21 of the Draft EIR. With respect to WHI, page 11-20 of the Draft EIR states the following, as slightly amended in Chapter 3 of this Final EIR:

[...] the proposed project would develop 24 single-family detached dwelling units on minimum lot sizes of approximately 9,000 sf, in an area that consists of residential lots

⁵ While significant and unavoidable traffic impacts were identified in the Draft EIR, these were identified for Douglas Boulevard and Sierra College Boulevard, which is not relevant to this discussion of transitions between lower and higher density residential uses.##

ranging from medium density-sized lots to the north, to large lot rural residential lots to the south. While the proposed project would develop homes on lots that are smaller than some of those in the immediate vicinity, there is a wide range of housing types and sizes in the surrounding unincorporated area, and many of the lots along Douglas Boulevard to the north are smaller in size than the average lot size proposed for the project (approximately 10,869 sf). The neighborhood across Douglas Boulevard is also comprised of single-family homes on approximately 9,000-sf lots that are similar in size. The Greyhawk neighborhood to the west is comprised of single-family homes on approximately 15,000-sf minimum lots, which are larger than the proposed project, but not substantially so, as WHI would include lot sizes up to 16,639 sf.

The proposed project is designed to maintain a 300-foot, open space setback from Douglas Boulevard so as to not be visible from the public, scenic roadway. The GBCP acknowledges that adjoining properties could have different zoning and Policy 3.2.6 requires that transitional areas or landscape buffers be constructed to minimize potential land use conflicts (Land Use, Policy 6). Individual home lots are adjacent to the project site boundaries on the east and south sides of the site. A 10-foot landscape lot would be provided at the rear of Lots 1-3 along the site's eastern boundary along with a six-foot tall solid wood fence. A 10-foot landscape easement was proposed along the southern boundary but was eliminated and replaced by an increased sewer easement (from 20 to 30 feet) required by the SMD2. The easement areas would contain existing natural vegetation to lessen the impact of the subdivision on the surrounding property.

Page 11-21 of the Draft EIR further states with respect to WHII:

The proposed project is designed to maintain a 300-foot, open space setback from Douglas Boulevard so as to not be visible from the public, scenic roadway. The GBCP acknowledges that adjoining properties could have different zoning and Policy 3.2.6 requires that transitional areas or landscape buffers be constructed to minimize potential land use conflicts (Land Use, Policy 6). Individual home lots are adjacent to the project site boundaries on the east and south sides of the site. The lots have been oriented so that the main living area windows of the proposed residences do not directly face existing neighboring homes. A 10- to 30-foot landscape area would be provided at the rear of Lots 45 through 47 along the site's eastern boundary, and a 30-foot sewer easement would be provided along the site's southern boundary, which would contain some natural vegetation. The landscape areas would also contain existing natural vegetation, as well as new native plantings, to lessen the impact of the subdivision on the surrounding property.

The above sections of the Draft EIR demonstrate that the proposed projects have been designed to include appropriate transitions (i.e., setbacks) from adjacent rural residential development. It is also important to note that all of the proposed single-family homes within both projects would be single-story to minimize the potential for land use incompatibilities with existing adjacent lower density residential development.

Response to Comment 9-8

Please see Responses to Comments 4-2 and 4-3.

Response to Comment 9-9

The comment expresses an opinion that the project merits no statement of overriding considerations. According to CEQA Guidelines Section 15093,

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

The decision as to whether the benefits of the proposed projects outweigh the unavoidable adverse environmental effects listed on page 17-85 of the Draft EIR is the responsibility of the Placer County Board of Supervisors. This is not a question related to the adequacy of the Draft EIR; and the comment has been forwarded to the decision-makers.

Letter 10

From: Mark Moreno [<mailto:moreno.mark@gmail.com>]

Sent: Tuesday, December 11, 2018 5:46 PM

To: Christopher Schmidt <CRSchmid@placer.ca.gov>; Shirlee Herrington <SHerring@placer.ca.gov>

Subject: WHI & II

As a Granite Bay resident, I ask that you please consider the following thoughts and comments.

- 10-1** 1) I recommend that the Applicant evaluate a lower density alternative rather than the No Build option. A lower density alternative would achieve all goals and objectives with fewer significant and unavoidable impacts as well as conform to the rural nature of Granite Bay.
- 10-2** 2) The requested 50% coverage variance should be denied since this is a self-induce variance.
a) The Applicant has CHOSEN to reduce the parcel size and as such this would be the granting of special privileges within the zoning district in direct violation of CEQA and CA Gov 65852.
b) The reduced parcel size appears to be a "math game" to qualify for a density bonus. Under CEQA, the profitability of a project is not grounds for granting a self-induced variance.
c) There is no special feature of this parcel that prohibits the applicant from constructing the project as zoned or even as proposed without the granting of the density bonus. This would eliminate the need for a coverage variance.
- 10-3** 3) The analysis of the As Zoned project is incorrect when it states that Granite Bay already has adequate homes on 1 acre parcels and the project is providing a housing mix.
a) The Granite Bay Community Plan has certified Housing and Land Use elements which clarify the appropriate mix of homes to maintain the rural quality of Granite Bay.
b) To maintain the rural quality of Granite Bay, projects are encouraged to develop
- 10-4** UNDER zoning requirements.
c) By shifting to higher density, smaller parcel size homes, the project in conjunction with recently approved higher density projects, will shift the balance of the Housing and Land Use elements
- 10-5** 4) South of Douglas to Eureka is defined in the Granite Bay Community Plan as Rural. Approving higher density, small parcel homes would be in direct violation and amount to a re-writing of the Granite Bay Community Plan which can only be done through voter approval. The Plan was recertified in 2012 as such, the alternative to be approved must be the As Zoned
- 10-6** 5) It is my understanding from residents adjacent to the project, that they are not willing to grant an easement for use of Quartzite as a Secondary EVA.
- 10-7** 6) The project fails to provide adequate transitions to immediately adjacent and contiguous parcels as required by CEQA, GBCP and the PCGP.
- 10-8** 7) The sewer capacity study as well as traffic studies have not been completed and as such impacts cannot be gauged by the community
- 10-9** 8) The project merits no statement of overriding consideration since the proposal is not for the benefit of the community, alters the housing mix in violation of the community plan and is a "spot" rezone within a designated rural district.

Warm regards,
Mark

LETTER 10: MARK MORENO

Response to Comment 10-1

Please see Response to Comment 9-1.

Response to Comment 10-2

Please see Response to Comment 9-2.

Response to Comment 10-3

Please see Response to Comment 9-3.

Response to Comment 10-4

Please see Response to Comment 9-4.

Response to Comment 10-5

Please see Response to Comment 9-5.

Response to Comment 10-6

Please see Response to Comment 9-6.

Response to Comment 10-7

Please see Response to Comment 9-7.

Response to Comment 10-8

Please see Responses to Comments 4-2 and 4-3.

Response to Comment 10-9

Please see Response to Comment 9-9.

Letter 11

Shirlee Herrington

Subject: FW: WHI and II Comments for Planning Commission 12/13/18

From: Larissa Berry [mailto:lzberry@peoplepc.com]
Sent: Tuesday, December 11, 2018 7:05 AM
To: Christopher Schmidt <CRSchmid@placer.ca.gov>
Subject: Fw: WHI and II Comments for Planning Commission 12/13/18

11-1 Please correct: CA Gov Code 65852: All such regulations shall be uniform for each class or kind of building or use of land throughout each zone,

----Forwarded Message-----

From: Larissa Berry
Sent: Dec 11, 2018 10:01 AM
To: Christopher Schmidt
Cc: EJ Ivaldi, "SHerring@placer.ca.gov", MAC, "defendgb@gmail.com", GBCA, AEL-Leslie Warren
Subject: WHI and II Comments for Planning Commission 12/13/18

Good morning Chris,

- 11-2** I will not be able to attend the Planning Commission public hearing on the WHI and II proposals. Very cursory comments, since the DEIR is so expansive, are as follow:
- 11-3** 1) I recommend that the Applicant evaluate a lower density alternative rather than the No Build option. A lower density alternative would achieve all goals and objectives with fewer significant and unavoidable impacts as well as conform to the rural nature of Granite Bay.
- 11-4** 2) The requested 50% coverage variance should be denied since this is a self-induce variance.
- 11-5** a) The Applicant has CHOSEN to reduce the parcel size and as such this would be the granting of special privileges within the zoning district in direct violation of CEQA and CA Gov 56852.
- 11-6** b) The reduced parcel size appears to be a "math game" to qualify for a density bonus. Under CEQA, the profitability of a project is not grounds for granting a self-induced variance.
- 11-7** c) There is no special feature of this parcel that prohibits the applicant from constructing the project as zoned or even as proposed without the granting of the density bonus. This would eliminate the need for a coverage variance.
- 11-4** 3) The analysis of the As Zoned project is incorrect when it states that Granite Bay already has adequate homes on 1 acre parcels and the project is providing a housing mix.
- 11-5** a) The Granite Bay Community Plan has certified Housing and Land Use elements which clarify the appropriate mix of homes to maintain the rural quality of Granite Bay.
- 11-6** b) To maintain the rural quality of Granite Bay, projects are encouraged to develop UNDER zoning requirements.
- 11-7** c) By shifting to higher density, smaller parcel size homes, the project in conjunction with recently approved higher density projects, will shift the balance of the Housing and Land Use elements
- 11-6** 4) South of Douglas to Eureka is defined in the Granite Bay Community Plan as Rural. Approving higher density, small parcel homes would be in direct violation and amount to a re-writing of the Granite Bay Community Plan which can only be done through voter approval. The Plan was recertified in 2012 as such, the alternative to be approved must be the As Zoned
- 11-7** 5) It is my understanding from residents adjacent to the project, that they are not willing to grant an easement for use of Quartzite as a Secondary EVA.

**Letter 11
Cont'd**

- 11-8** 6) The project fails to provide adequate transitions to immediately adjacent and contiguous parcels as required CEQA, GBCP and the PCGP.
- 11-9** 7) The sewer capacity study as well as traffic studies have not been completed and as such impacts cannot be gauged by the community
- 11-10** 7) The project merits no statement of overriding consideration since the proposal is not for the benefit of the community, alters the housing mix in violation of the community plan and is a "spot" rezone within a designated rural district.

Thank you for your consideration

Larissa Berry

LETTER 11: LARISSA BERRY, LETTER 2 OF 3

Response to Comment 11-1

The comment provides a correction to the government code section referenced by the commenter in Comment 11-3. The comment does not address the adequacy of the Draft EIR.

Response to Comment 11-2

Please see Response to Comment 9-1.

Response to Comment 11-3

Please see Response to Comment 9-2.

Response to Comment 11-4

Please see Response to Comment 9-3.

Response to Comment 11-5

Please see Response to Comment 9-4.

Response to Comment 11-6

Please see Response to Comment 9-5.

Response to Comment 11-7

Please see Response to Comment 9-6.

Response to Comment 11-8

Please see Response to Comment 9-7.

Response to Comment 11-9

Please see Responses to Comments 4-2 and 4-3.

Response to Comment 11-10

Please see Response to Comment 9-9.

Letter 12

From: Camille Helland [<mailto:geckohell@aol.com>]
Sent: Wednesday, December 12, 2018 10:08 AM
To: Christopher Schmidt <CRSchmid@placer.ca.gov>; Shirlee Herrington <SHerring@placer.ca.gov>
Subject: White Hawk I and II comments

Christopher Schmidt and Shirlee Herrington:

- 12-1 Our community has the following concerns about White Hawk I and II since these projects propose to build virtually zero lot line homes adjacent to sensitive waterways and at the site of a former silver mine. Also, we are aware that previous proposals (unlike this one) were required to maintain the ground cover so as not to spread any contaminants.
- 12-2
- 12-3 1) I recommend that the Applicant evaluate a lower density alternative rather than the No Build option. A lower density alternative would achieve all goals and objectives with fewer significant and unavoidable impacts as well as conform to the rural nature of Granite Bay. 2) The requested 50% coverage variance should be denied since this is a self-induce variance. a) The Applicant has CHOSEN to reduce the parcel size and as such this would be the granting of special privileges within the zoning district in direct violation of CEQA and CA Gov 65852. b) The reduced parcel size appears to be a "math game" to qualify for a density bonus. Under CEQA, the profitability of a project is not grounds for granting a self-induced variance. c) There is no special feature of this parcel that prohibits the applicant from constructing the project as zoned or even as proposed without the granting of the density bonus. This would eliminate the need for a coverage variance. 3) The analysis of the As Zoned project is incorrect when it states that Granite Bay
- 12-4 already has adequate homes on 1 acre parcels and the project is providing a housing mix. a) The Granite Bay Community Plan has certified Housing and Land Use elements which clarify the appropriate mix of homes to maintain the rural quality of Granite Bay. b) To maintain the rural quality of Granite Bay, projects are encouraged to develop UNDER zoning requirements. c) By shifting to higher density, smaller parcel size homes, the project in conjunction with recently approved higher density projects, will shift the balance of the Housing and Land Use elements. 4) South of Douglas to Eureka is defined in the Granite Bay Community Plan as Rural. Approving higher density, small parcel homes would be in direct violation and amount to a re-writing of the Granite Bay Community Plan which can only be done through voter approval. The Plan was recertified in 2012 as such, the alternative to be approved must be the As Zoned. 5) It is my understanding from residents adjacent to the project, that they are not willing to grant an easement for use of Quartzite as a Secondary EVA. 6) The project fails to provide adequate transitions to immediately adjacent and contiguous parcels as required by CEQA, GBCP and the PCGP. 7) The sewer capacity study as well as traffic studies have not been completed and as such impacts cannot be gauged by the community. 8) The project merits no statement of overriding consideration since the proposal is not for the benefit of the community, alters the housing mix in violation of the community plan and is a "spot" rezone within a designated rural district.
- 12-5
- 12-6
- 12-7
- 12-8
- 12-9
- 12-10
- 12-11

Sincerely,

Camille and Rich Helland
9840 Cranleigh Drive
Granite Bay CA 95746
(916) 788-1962

LETTER 12: CAMILLE AND RICH HELLAND

Response to Comment 12-1

The comment is an introductory statement and does not address the adequacy of the Draft EIR. Please note that as discussed on page 3-18 of the Draft EIR, the proposed building setbacks would generally be as follows:

- Front: 20 feet minimum to front-on garage doors, 10 feet to the front of a home (including roof eaves) (Note: corner lots shall only have one ‘front’);
- Rear: 20 feet minimum;
- Sides: five feet minimum; and
- Streetside: 10 feet to side of home (including roof eaves).

Based on the above, the proposed single-family homes would include setbacks, and would not be zero lot line homes as the commenter suggests.

Furthermore, as noted on page 10-37 of the Draft EIR, Mitigation Measures 10-4(a) through 10-4(c) would ensure that the proposed buildings include appropriate setbacks from Strap Ravine and the unnamed tributary within the WHII site.

As illustrated in Figures 9-1, 9-2, and 9-3 of the Hazards and Hazardous Materials chapter of the Draft EIR, extensive soil testing has occurred on both the WHI and WHII sites. The soil sampling efforts and results are described in detail on pages 9-3 through 9-8 for WHI, and pages 9-9 and 9-10 for WHII. The extensive sampling efforts have demonstrated that all metals were found to be present at a concentration that did not pose a risk to human health or the environment. Based on the results, Wallace Kuhl Associates determined that the sites are suitable for residential development (Draft EIR, pp. 9-7 and 9-9).

Response to Comment 12-2

With regard to soil contamination, please see Response to Comment 12-1.

Response to Comment 12-3

Please see Response to Comment 9-1.

Response to Comment 12-4

Please see Response to Comment 9-2.

Response to Comment 12-5

Please see Response to Comment 9-3.

Response to Comment 12-6

Please see Response to Comment 9-4.

Response to Comment 12-7

Please see Response to Comment 9-5.

Response to Comment 12-8

Please see Response to Comment 9-6.

Response to Comment 12-9

Please see Response to Comment 9-7.

Response to Comment 12-10

Please see Responses to Comments 4-2 and 4-3.

Response to Comment 12-11

Please see Response to Comment 9-9.

Letter 13

Shirlee Herrington

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Thursday, December 13, 2018 9:53 AM
To: EJ Ivaldi
Cc: Leigh Chavez; Shirlee Herrington; Christopher Schmidt
Subject: Re: Whitehawk I and II DEIR is Available for Public Review and Comment

Hello Chris,

- 13-1 Unfortunately, I will not be able to make the hearing. Without having had sufficient time to more than gloss over the 770+ page document plus appendices I can only provide a few concerns regarding the WhiteHawks DEIR:
- 13-2 1. Traffic modeling is not sufficient data to consider Granite Bay Community Plan Amendments: 1) The numerous variances granted to many projects in Granite Bay have created cumulative traffic impacts over the
13-3 past couple years. 2) the faulty traffic Granite Bay traffic study identified by an independent expert (not the lead
13-4 agency). 3) Douglas Boulevard is a well known cut through for regional traffic. 4) a significant traffic impact
13-5 was identified forcing an EIR as a response to the White Hawks MND traffic impacts (again not identified by
13-6 the lead agency). Public review and full Placer County disclosure of the traffic circulation update including SACOG data is required for transparency.
- 13-7 2. A sewer study is required for a Granite Bay Community Plan amendment. This study is long overdue. Previously approved projects such as have relied on hokey developer analysis and solutions for sewers.
- 13-8 3. There is no section of overriding consideration. The amendments and variance entitlements are therefore self induced and to approve them would be granting special privilege. The absence of this section speaks volumes.
- 13-9 4. Many of the "goals" of the project look like a rewrite of the Granite Bay Community Plan by the developer and Project Planner. This logic of putting developer goals that are actually in conflict with the Granite Bay Community Plan are self serving and do not reflect what was approved in the Granite Bay Community Plan. I challenge the Planner to reread the Community Plan as written and remove statements from the DEIR that are in conflict with the approved plan.
- 13-10 5. The removal of wetlands and Riparian areas is significant and is avoidable. As was pointed out by the
13-11 ecologist in the Ventura @ Granite Bay project, the County's mitigation program is outdated. The current in lieu
13-12 fees is not a sufficient mitigation for the removal and replacement of trees. Building as zoned would greatly
13-13 reduce the impact. This mitigation program needs significant rework before all of our wetlands are destroyed by a few.
- 13-14 6. The Strap Ravine HOA has not approved the EVA for WhiteHawk II.
- 13-15 7. Having lived near the project area for over 20 years, I can tell you that current flooding in the area is problematic. Attempting to add 4 times the density will create drainage issues.

Thank you for your consideration. Please consider this on the record for the hearing.

Cheryl Berkema

LETTER 13: CHERYL BERKEMA, LETTER 3 OF 5

Response to Comment 13-1

The comment does not address the adequacy of the Draft EIR.

Response to Comment 13-2

Please see Response to Comment 4-2.

Response to Comment 13-3

Please see Response to Comment 4-2.

Response to Comment 13-4

The comment is noted. Regional traffic using Douglas Boulevard is captured in the traffic counts that were conducted for the traffic impact study. Thus, the traffic impact analysis accounts for regional traffic occurring on Douglas Boulevard.

Response to Comment 13-5

The County was not forced to prepare an EIR for the WH projects. Rather, the decision to prepare an EIR was made by Placer County, as the CEQA lead agency, after carefully considering the public comments submitted on the Initial Study/Mitigated Negative Declarations that were released for the WH projects in November 2016.

Response to Comment 13-6

Please see Response to Comment 4-2.

Response to Comment 13-7

The sewer analysis within the Draft EIR relied on best available data for the Granite Bay (SMD 2) sewer system³ and future development projections. This approach enabled the County to accurately determine whether the projects will result in the need to expand the existing sewer system, as further discussed in Response to Comment 17-18 below.

Response to Comment 13-8

Please see Response to Comment 9-2 regarding variance concerns. The comment that there is no section of overriding consideration is unclear. An EIR is not required to include a statement of overriding consideration(s). Such a statement is prepared separately from an EIR, and pursuant to

⁶## This includes primarily the *Technical Memorandum: Hydraulic Model Analysis* (February 25, 2011), prepared by Brown and Caldwell.##

CEQA Guidelines Section 15093, must set forth the benefits of the project that outweigh the unavoidable adverse environmental effects. This statement of overriding consideration(s) must be presented to the decision-making body, in this case the Board of Supervisors, along with the EIR, for consideration of approval.

Response to Comment 13-9

CEQA Guidelines section 15124(b) requires an EIR's project description to describes the purpose of the proposed project including a statement of the objectives sought by the proposed project: "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project."

For a private project such as this, the project applicant routinely proposes the objectives and works with the lead agency to further refine the same to guide the selection of feasible alternatives to be evaluated in the EIR. The County's role as lead agency is to ensure the objectives are not so narrowly drafted as to artificially narrow the range of identified feasible alternatives (see *In re Bay-Delta* (2008) 43 Cal.4th 1143, 1166). In short, the project's objectives are basically the applicant's objectives for the proposed project.

While the commenter states generally that the developer's goals are in conflict with the GBCP, no specific examples of such alleged conflicts are provided.

Response to Comment 13-10

The removal of wetlands and riparian areas was not determined to be significant and unavoidable in the Draft EIR for reasons set forth in the following response to comment. In short, the projects are required by mitigation measures set forth in the Draft EIR to fully offset their impacts to wetlands and riparian areas. It should also be noted that the majority of wetland and riparian resources on both project sites would be avoided. For example, as shown on Table 6-10 and discussed on page 6-58 of the Draft EIR, only 0.9-acre of the 3.9 acres of riparian woodland would be impacted by WHI, and only 0.10-acre of the 2.7 acres of riparian woodland would be impacted by WHII. For wetlands, approximately 75 percent of the wetlands on WHI would be avoided, and approximately 60 percent of the wetlands on WHII would be avoided.

Response to Comment 13-11

The County's mitigation program for oak woodlands is not outdated, as will be demonstrated in the following discussion.

Mitigation for woodland losses within the development footprint must be achieved off-site. For larger projects, there are two mitigation options: preservation of existing woodlands or payment of an in-lieu fee. Both of these options are common approaches to oak woodland mitigation in the region, and are not considered "outdated." In addition, these methods are consistent with Public Resources Code Section 21083.4 regarding oak woodland conservation, which identifies, among

other potential methods, conserving oak woodlands through the use of conservation easements, and contributing funds for the purpose of purchasing oak woodlands conservation easements.

With regard to preserving oak woodlands, the project applicant or project sponsor may dedicate to private or public ownership one or more areas equivalent to twice the area of woodland lost, with County consent. These areas must be acceptable to the County as being equivalent (or better) in quality to the woodlands lost. In addition to the donation of land, an endowment for management must be provided. The County in consultation with the designated owner/manager will determine the amount of the endowment.

The second option is for a project applicant or project sponsor to make an in-lieu payment to the County of \$24,000 for each acre of woodland lost (representing a 2:1 ratio). These funds are used by the County to purchase conservation easements or fee title to other woodlands in the County. A proportion of the funds are set-aside as an endowment for managing the preserved property. Tree preservation funds have been utilized to purchase properties or easements with significant woodland resources including Hidden Falls Regional Park site, an oak tree conservation easement on the Kirk Ranch near Sheridan, and the acquisition of the Harvego/Bear River Preserve. For the WH projects, the applicant is planning to purchase riparian woodland mitigation credits at the Sacramento River Ranch, and for impacts to oak woodlands (2:1 ratio) and cottonwood stands (4:1 ratio), providing funding to the Placer Land Trust to assist with the purchase of the Laursen Outback property within the Lower Bear River Focus Areas of the Spenceville Conceptual Area Protection Plan. It is noted that while cottonwood stands are not protected under County policy or ordinance, the loss of these areas on the WH project sites is being mitigated at the request of CDFW given their status as a sensitive natural community.

Response to Comment 13-12

As summarized in Table 18-9 of the Draft EIR, development of the WHI and WHII sites under the Buildout Pursuant to Existing Zoning Alternative would result in fewer impacts to biological resources compared to the proposed project. The comment does not address the adequacy of the Draft EIR.

Response to Comment 13-13

The County's mitigation approach for wetlands is not outdated, as will be demonstrated in the following discussion. For wetlands, project applicants are required to provide written evidence of payment that compensatory habitat has been established through the purchase of mitigation credits at a wetland mitigation bank. Wetland mitigation banking is a common approach to mitigating wetland impacts that is supported by the U.S. Army Corps of Engineers (USACE), and is not considered "outdated."⁴ The USACE strives to achieve a goal of no net loss of aquatic resources. Consistent with this goal, the amount of money required to purchase credits must be equal to the amount necessary to replace wetland or riparian habitat acreage on a no net loss basis. Evidence of payment must describe the amount and type of habitat purchased at the bank site and resource

⁴ U.S. Army Corps of Engineers. *Mitigation*. Available at: <https://www.spk.usace.army.mil/Missions/Regulatory/Mitigation/>. Accessed February 2019.

values including compensation for temporal loss. The WHI and WHII projects intend to mitigate for CDFW-related impacts to Strap Ravine by preserving riparian habitat at the Sacramento River Ranch Wetlands Mitigation Bank at a 2:1 ratio, thus ensuring no net loss. For impacts to wetlands, the applicant's intent is to purchase wetland credits from a USACE-approved mitigation bank at a 1:1 ratio, thus ensuring no net loss. Although the County in the past has collected wetland impact mitigation fees and has purchased properties with wetlands or credits at mitigation banks with those funds, most applicants elect to purchase credits on their own, satisfying their mitigation obligations under CEQA. Consequently, the County has less than \$150,000 in the wetland preservation fund and this money is expected to be transferred into the Placer County Conservation Plan program once it is approved and operating.

Response to Comment 13-14

Please see Response to Comment 3-3.

Response to Comment 13-15

Runoff from new impervious surfaces would be routed to each project's internal storm drainage system so as to prevent runoff from flowing onto adjacent parcels. Stormwater runoff from new impervious surfaces would be routed through the proposed stormwater drainage systems, including the proposed bio-retention basins, before discharging to Strap Ravine. While some stormwater runoff would infiltrate the soils underlying the bio-retention basins, in general, the proposed stormwater systems would not be designed to provide for detention. As noted on page 10-31 of the Draft EIR, this would be consistent with the County's approach to peak flow management in the watershed. The project site is located in an area identified in the Dry Creek Watershed Flood Control Plan where local stormwater detention is not recommended. Mitigation measures for development in this area include payment of flood control development fees to fund regional detention basins to reduce flooding on major streams in the Dry Creek watershed (see Mitigation Measure 10-3(b) of the Draft EIR).

To assess potential impacts of the WHI and WHII projects on flows within Strap Ravine in the project vicinity, both project sites were modeled with impervious surfaces ranging from 35 percent to 65 percent. It is important to note that these results reflect flows that would result from full buildout of the land uses shown in the various community plans and General Plan for the Dry Creek Watershed. Peak flow rates shown in Table 10-3 of the Draft EIR (pg. 10-32) are for Strap Ravine and include the 187 cubic feet per second (cfs) of flow through the reconstructed unnamed tributary that flows through the WHII site. As shown in the table, the 100-year post development peak flows downstream of the site were shown to increase from 838.5 cfs to 840.8 cfs, approximately 2.3 cfs (conservatively) or 0.28 percent.

While the upstream and downstream 100-year flood water surface elevations would not be significantly increased after development of the sites (0.02-foot to 0.04-foot increase), any base flood water-surface elevation (WSEL) increase from proposed construction within a regulatory floodway requires a Conditional Letter of Map Revision (CLOMR) through FEMA. The Draft EIR includes Mitigation Measures 10-3(a-c) and 10-4(a-f). It is noted that Mitigation Measure 10-4(e) requires the applicant(s) to submit a final drainage report, demonstrating that the proposed

project will not significantly increase the limits or water surface elevation of the Strap Ravine 100-year floodplain upstream and downstream of the project site to the satisfaction of the Engineering and Surveying Division and the Placer County Flood Control District.

Letter 14

Shirlee Herrington

Subject: FW: Whitehawk DEIR

From: Richard Ryan [mailto:ryanoperahouse@gmail.com]

Sent: Tuesday, January 1, 2019 2:29 PM

To: Christopher Schmidt <CRSchmid@placer.ca.gov>

Subject: Whitehawk DEIR

Response to DEIR

14-1

I join in with my fellow resident of Quartzite Circle expressing opposition to the proposed EAV easement. Rather than restate the objection previously made by others, I address potential mitigation measures to eliminate the pedestrian impact onto Quartzite Circle and financial burden on its road.

14-2

- Quartzite Circle is a light duty chip seal road. It deteriorates rapidly when exposed to heavy vehicle traffic. The road is signed prohibiting truck usage. Even occasional fire truck usage for training would adversely impact the road. Quartzite residents pay \$500 each per year toward the road maintenance. The Whitehawk CCRs should require the Whitehawk HOA pay the cost of additional road maintenance in an amount at least equal to that paid by Quartzite residents.

14-3

- A physical barrier to stop pedestrian traffic is needed. The proposed tube gate will have little deterrence to pedestrians who choose to disregard signage and merely go around, over or through a tube gate.
- In addition to the more effective gate, a fence is necessary on either side of the gate. The fence should extend at least 50' on the north side of the gate and the full length of the vacant Quartzite property to the south of the EAV easement. This would preclude trespassers from going around the gate and walking through vacant property onto Quartzite.

14-4

- The primary responsibility for maintaining the signage, gate and fencing should be that of the Whitehawk and addressed in their CCRs. In the event the Whitehawk HOA fails to maintain the the fencing/gate/signage, upon reasonable notice, the Quartzite HOA should have a reimbursable right to maintain the signage, fence and gate.

14-5

- If the fencing is enacted as suggested here, it would eliminate the need for the EAV barriers adjacent to the streets on Quartzite or in Whitehawk which would benefit the optics of both subdivisions.

Richard Ryan

LETTER 14: RICHARD RYAN

Response to Comment 14-1

The comment is an introductory statement and does not address the adequacy of the Draft EIR. Responses to the specific concerns raised by the commenter are provided below.

Response to Comment 14-2

Although Quartzite Circle is signed prohibiting truck traffic, Recology provides weekly household and green waste service to the Granite Bay community, including Quartzite Circle. Recology's trucks weigh 54,000 pounds gross vehicular weight (GVW) and, it was recently confirmed that they are not aware of any damage, complaints, or asserted damage as a result of weekly trips, each using two trucks. According to South Placer Fire District (SPFD), they have driven Quartzite Circle for "National Night Out" on numerous occasions over the past decade. SPFD's fire equipment ranges between 40,000 and 75,000 pounds GVW.

According to SPFD there are 21 EVAs located within Granite Bay neighborhoods (not including two recently-approved projects which have not yet been constructed), none of which have ever been used except perhaps for the final inspection and acceptance of the specific EVA improvement. Consequently, the suggested mitigation is unwarranted given the anticipated (in)frequency of use by future WHII residents. Furthermore, the EVA will also be available to Quartzite residents in the event of an emergency necessitating evacuation through WHII.

Response to Comment 14-3

The details of the gate(s) are not part of the vesting tentative map, but it is the County's understanding that the project applicant intends to install a 4-foot tall wrought iron gate at the eastern property line of the WHII project. Fencing north and south of that gate will be the existing barbed wire, continuing north of the gate along the Wringer's property line, and south of the gate to the top of the bank for the swale, which conveys drainage from the east through the WHII site. The barbed wire fencing will continue from the top of south bank of the swale along the eastern boundary, south to where the southeast corner of WHII intersects with the existing sewer easement. At that wrought iron gate, and at a post and cable fence to be located 30 feet off the edge of pavement of the interior street within WHII, 12" x 18" signs will be placed stating "No Pedestrian Access – Private Property – Emergency Access Only". A simple tube steel triangular-shaped barrier gate will be located 30 feet off the edge of Quartzite Circle's pavement and will include the same signage. The County Development Review Committee will review all improvements including, but not limited to, fencing, the gate features, and signage. The comment does not address the adequacy of the Draft EIR, but will be forwarded to the decision-makers.

Response to Comment 14-4

The WHII HOA will be responsible for the ongoing maintenance of the EVA, gates, and signage. This will be referenced in the project's Conditions of Approval as well as the CC&Rs. The EVA surface will not be paved but instead will be comprised of "Grasscrete" or similar system with an

open honeycomb-like structural concrete or plastic section placed upon a gravel base at a thickness designed to support the weight of emergency equipment and provide a pervious surface for drainage that also allows native grasses or other low-profile plantings to grow through the open structural section resulting in the EVA being far less conspicuous than a paved road. The comment does not address the adequacy of the Draft EIR, but will be forwarded to the decision-makers.

Response to Comment 14-5

The comment is noted. See Response to Comment 14-3.

Letter 15

Shirlee Herrington

From: Judi Bruckman <judibruckman@yahoo.com>
Sent: Wednesday, January 09, 2019 4:58 PM
To: Placer County Environmental Coordination Services
Subject: Halt Whiehawk I and II

15-1

Please stop Whitehall I and II as it does not meet rural Granite Bay zoning requirements.
Thank you.
29 year resident of Granite Bay
Judi Bruckman.

[Sent from Yahoo Mail on Android](#)

LETTER 15: JUDY BRUCKMAN

Response to Comment 15-1

The comment does not address the adequacy of the Draft EIR. The proposed projects are not entirely consistent with the current zoning designations for their respective sites, which is why a rezone is being requested for each project. However, it should be noted that the current zoning district for both sites is Residential Agricultural (RA) and would remain as such. The rezones are related to changing the minimum building site and planned development combining district densities. Rezones are discretionary actions that require approval from the legislative body, in this case, the Placer County Board of Supervisors. This comment has been forwarded to the Planning Commission and Board of Supervisors for consideration during their respective deliberations on the proposed projects.

Letter 16

Shirlee Herrington

From: Holly <hollyjesq@aol.com>
Sent: Saturday, January 12, 2019 8:20 PM
To: Placer County Environmental Coordination Services
Cc: Christopher Schmidt
Subject: Re: Whitehawk I and II - Draft EIR

Correction: Title 14 CCR reference should be to section 15141.

> On Jan 12, 2019, at 8:17 PM, Holly <hollyjesq@aol.com> wrote:

>

> To Whom It May Concern:

>

16-1

> Title 14 of the California Code of Regulations section 151410 provides that the draft EIR should be only 150 pages, with those of unusual scope to be less than 300 pages. The draft EIR for the Whitehawk proposals is 747 pages, plus the 1,638 pages in the appendices for a total of 2,385 pages. Placer County further released this EIR for public comment over the holidays, with no extension in the time period to respond.

>

> Placer County is in violation of the page requirements for the draft EIR pursuant to the California Code of Regulations. Request is hereby made to (1) ensure the Draft EIR complies with the page limitations; and (2) provide for further extension of time for the public to adequately respond.

>

16-2

> Furthermore, there is no adequate justification to approve the increase in density for these projects or to allow zoning modifications to authorize same. There is no adequate mitigation to the increase in traffic and congestion, and to already high level of services, or that which would adequately address the destruction in the nature and beauty of that area on Douglas Boulevard.

>

> Thank you in advance for your consideration.

>

> Holly Johnson

>

LETTER 16: HOLLY JOHNSON, LETTER 1 OF 2

Response to Comment 16-1

Please see Response to Comment 5-1.

Response to Comment 16-2

Regarding the requested variance and density bonus, please see Response to Comment 9-2.

Issues related to traffic and congestion are discussed in Chapter 14, Transportation and Circulation, of the Draft EIR. As noted on pages 14-48 through 14-49, with implementation of mitigation, impacts to study intersections would be less-than-significant. While significant and unavoidable impacts are identified for study roadway segments under the Existing Plus WHII and Existing Plus WHI and WHII conditions, implementation of Mitigation Measure 14-3 would reduce the significance of the impact to the maximum extent feasible.

As noted in Chapter 4, Aesthetics, of the Draft EIR, with implementation of mitigation, impacts to aesthetics resources within the project area were determined to be less-than-significant. It is important to note that each project incorporates and protects a 300-foot scenic setback from Douglas Boulevard, in which all existing natural vegetation would remain, except for that which would be removed for constructing the project entry way. In so doing, the natural appearance of the project sites would be largely retained, as viewed from Douglas Boulevard.

Letter 17

1/13/2019

Good evening Chris,

Please accept my lengthy comments on a lengthy DEIR as part of the administrative record.

Comments on White hawks I and II DEIR:

17-1 State CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. State CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

17-2 The Whitehawk I and II projects DEIR is deficient in the following areas:

- The project fails to demonstrate that adequate transition has been created to immediately adjacent and contiguous parcels. A statement of fact that transition has been created is not substantial evidence.

17-3 ○ A reconfiguration of the project with structures more centrally located with larger setbacks could achieve all of the stated goals.

17-4 ○ Policy 1.O.3 “The County shall require that all new development be designed to be compatible with the scale and character of the area.”

- The character of the rural designated corridor is acre plus parcels. The DEIR has failed to define how a “building envelope” is rural. While the Open space is an asset for the development, the project as proposed could accomplish goals and numbers with a reconfiguration respecting greater setbacks from immediately adjacent and contiguous parcels.

17-5 ○ A redesign of the planned homes could also remove the need for a self-induced coverage variance and/or the developer could achieve his goals of home style by increasing the building envelope to accommodate 40% coverage.

17-6 ○ The DEIR has failed to demonstrate how the project as planned is not in conflict with Policy 1.K.4 “The County shall require that new development incorporates sound soil conservation practices and minimizes land alterations. Land alternations should comply with the following guidelines:

- Limit cut and fill
- Limit grading to the smallest practical area of land

17-7 ○ The project MND called for cuts of 12ft and blasting of a former active silver mine site

- Soil testing should adhere to NIOSH standards and be conducted at blasting depth as per County (exhibit C)

17-8 ○ soil testing should be completed to determine that there are no significant levels of common mining contaminants including cyanide and lead. “Water pollution from mine waste rock and tailings may need to be managed for decades, if not centuries, after closure.” *Safe Drinking Water Foundation.*

**Letter 17
Cont'd**

- 17-9**
 - The DEIR is deficient in that it does not clearly provide a 3D rendering exposing the true impacts including dividing existing neighborhoods, the massive destruction of trees and changing the topography of the project site in violation of Placer County land use elements. (exhibits A , B)
 - 3D aerial renderings of ALL alternatives should be provided to clearly demonstrate the impacts of each alternative to visually determine which has the least impact.
- 17-10**
 - The DEIR has represented the loss of trees in inches rather than in tree numbers. This conversion of loss trees is of no meaning to the average resident and should be clearly expressed both visually and numerically.
- 17-11**
 - The Whitehawk projects claim required densities in order to be economically feasible to pay for upgrades to infrastructure and rely on this statement should the need arise to make road improvements. CEQA considers project recently approved or anticipated in the near future. The DEIR calls on neither and as such, this economic claim cannot be considered.
 - The DEIR has not taken into account that the less dense alternatives may not require infra-structure upgrades. This needs to be properly evaluated.
- 17-12**
 - The statements that the project bring a mix of homes to Granite Bay since there are more than enough acre homes available is a subjective statement and not substantiated with an analysis of the impacts to the Housing and Land Use elements of the GBCP.
 - Since the Community Plan has identified an appropriate mix of housing types to maintain the rural character of the community recognized by both the GBCP and the PCGP as a unique asset of Granite Bay, the DEIR fails to substantiate this claim.
- 17-13**
 - How will this increased density impact the Granite Bay Housing Ratio and impact our perception as a rural community?
- 17-14**
 - Both the General and Community Plan hold this Rural quality as worth preserving even if development is to occur below approved zoning. How will this high-density project not degrade the rural character of GB?
- 17-15**
 - South Placer Fire Department anticipates 974 residential units will be built within the Granite Bay Community and the Horse Shoe Bar Community over the next 10-15 years. The addition of higher than planned for density will accelerate and make inadequate the fire department ability to maintain emergency response rates. A National Fire Safety Standards analysis for emergency response should be included.
- 17-16**
 - The HOA directly adjacent to WHII has not granted the developer access to Quartzite for use as a secondary EVA. The fire department may state that the road is adequate, however, they do not have the authority to grant the developer legal use of the road.
- 17-17**
 - The project, should it be approved, must have as a condition of approval the requirement to secure access from the HOA prior to being granted building permits.
- 17-18**
 - Placer County Specific Policies for Intensity of Use: 2. Population densities within the planning area should be guided by consideration or topography, geology, vegetative cover, preservation of natural terrain and resources, and access to transportation and service facilities.
 - At this time, the Placer County Sewer Capacity study has not yet been released (Due end 2019) and it is fair argument to say that it is unknown if this project will accelerate the need to upgrade the existing sewer capacity.
- 17-19**
 - At this time, the Granite Bay Cumulative Traffic Study is still in progress. It is fair argument to state that traffic impacts may not be fully mitigated.

**Letter 17
Cont'd**

- 17-20** ○ The removal of almost 1000 trees and grading of more than 50% of the parcel is in direct conflict with the Specific policy cited above.
- 17-21** ○ The volume of soil being moved and imported (identified in the MDN), along with cuts of 12ft would appear to require additional studies for the effects of changes in ground water, water shedding, water runoff, contamination of Strap Ravine, contributing to flooding of adjacent parcels (with special attention to the land parcel between White Hawk I and II), effects on the health of the few trees left in place, impacts of the large number of trees being removed. Changes of this magnitude do indeed “substantially change the topography of the parcel” and cannot be mitigated to a less than significant level.

Thank you for considering my comments

Larissa Berry

**Letter 17
Cont'd**

Exhibit A



Exhibit B



**Letter 17
Cont'd**

Exhibit C

MEMORANDUM

OFFICE OF THE
PLACER COUNTY HEALTH AND HUMAN SERVICES
Environmental Health Services

RECEIVED
MAR 02 2006
PLANNING DEPT.

TO: Maywan Krach, Planning Department

FROM: Grant Miller, R.E.H.S. *GM*
Land Use and Water-Resources Section

DATE: March 1, 2006

SUBJECT: Beaver Creek Subdivision (PSUB 05-0366), 3rd Submittal

Environmental Health Services has reviewed the subject document and requests additional information before making an environmental determination.

Our staff Engineering Geologist has reviewed this project and has the following comments. "I reviewed the soil sampling report (Geocon, Feb. 1, 2006) and discussed the results with DTSC staff. The testing identified some low levels of mercury at a couple of locations at the surface and at the 2-foot depth. Arsenic was not found, however, arsenic testing was limited to the upper 6 inches. The shallow testing is useful to predict hazards in areas anticipated to be undisturbed. However, tailings are typically tested at or near the bottom of the deposit in order to determine the worst case conditions and predict what may be encountered in excavations or other disturbed areas. These areas could present health hazards or impacts to groundwater. Deeper testing for metals should be conducted in areas of potential disturbance such as the proposed bridge site, future utilities, and lots located on tailings (future swimming pools, etc.)."

Contact Dave Buck at 530-745-2300 for any questions relative to the technical aspects of the soil sampling protocol for this project.

LETTER 17: LARISSA BERRY, LETTER 3 OF 3

Response to Comment 17-1

The comment cites sections of the CEQA Guidelines that include recommendations for responding to public comments, and does not address the adequacy of the Draft EIR.

Response to Comment 17-2

Please see Comment 9-10 regarding compatibility with the neighboring residential uses.

Response to Comment 17-3

The site configuration suggested by the commenter is similar to the Buildout Pursuant to Existing Alternative evaluated in Chapter 18 of the Draft EIR.

Response to Comment 17-4

As noted by the commenter, the project area contains numerous one-acre or larger residential parcels. However, the project area also includes many considerably smaller parcels that are similar in size to the parcels included in the WHI and WHII projects. The commenter cites Policy 1.O.3 of the General Plan, but omits reference to the recommendations included in the policy, which are intended to ensure that new development is compatible with the scale and character of the area. These recommendations are as follows:

Structures, especially those outside of village, urban, and commercial centers, should be designed and located so that:

- a. They do not silhouette against the sky above ridgelines or hilltops;*
- b. Roof lines and vertical architectural features blend with and do not detract from the natural background or ridge outline;*
- c. They fit the natural terrain; and*
- d. They utilize building materials, colors, and textures that blend with the natural landscape (e.g., avoid high contrasts).*

With respect to ‘a’, because all of the proposed homes would be single-story, they would not silhouette against the sky. With respect to ‘b’, the single-story roof lines would not detract from the natural background. As discussed in Response to Comment 9-10, buffers/setbacks have been included in the proposed project to ensure that native vegetation and/or landscaping is maintained around the project edges to help screen the proposed homes. With respect to ‘c’, it should first be noted that the terrain of both project sites has been altered due to past mining activities. Thus, while cut and fill is required, this is largely a result of the need to create building pads where tailings currently exist. In general, as discussed in the Aesthetics chapter of the Draft EIR (pp. 4-13 through 4-16), the projects have been designed to retain significant portions of natural features. For example, 54 percent, or 9.82 acres, of the WHI project site would be open space including 5.39 acres of ‘restricted open space’, 4.1 acres of ‘open space – common area’, and a 0.33-acre park. For WHII, 47 percent, or 15.47 acres, of the project site would be open space, including 10.8

acres of ‘restricted open space’, 3.8 acres of ‘open space – common area’, and a 0.87-acre park. With respect to ‘d’, as discussed on pg. 3-18 of the Project Description chapter of the Draft EIR, the proposed projects would include a set of design guidelines (Whitehawk Architectural and Design Guidelines) which would establish standards for architectural design, building materials, colors, streetscape design, setbacks, massing, entry features, lighting, landscaping, fencing, and hardscapes. The Whitehawk Architectural and Design Guidelines, enforced by the projects’ Homeowners Association(s), would supplement the Placer County Design Guidelines Manual. Consistent with the Placer County Design Guidelines Manual (i.e., Section E.4., Granite Bay Special District Guidelines), the projects would utilize earth tone colors, and materials, including wood, brick, and stone, that blend with the natural landscape.

The above demonstrates that the proposed projects are compatible with the scale and character of the area. Incorporation of greater setbacks from immediately adjacent parcels is considered in the Alternatives Analysis chapter of the Draft EIR (Chapter 18).

Response to Comment 17-5

The comment does not address the adequacy of the Draft EIR. Regarding the requested variance, see Response to Comment 9-2.

Response to Comment 17-6

Policy 1.K.4 of the Placer County General Plan, quoted by the commenter, pertains to protecting visual and scenic resources (pg. 39 of the Placer County General Plan). While some significant cut and fill work is required for the proposed projects, the soil work would not have the effect of substantially degrading visual and scenic resources, such as could occur with hillside developments. The cut and fill work is primarily required as a result of the varying on-site topography due to past mining activities. Notwithstanding this, approximately half of each project site would remain undisturbed. As noted on page 11-35 of the Draft EIR, overall, approximately 9.82 acres of the WHI site (54 percent) and 15.47 acres of the WHII site (47 percent), including Strap Ravine and the associated floodplain, would be retained as open space; development within the open space would be limited to access roadways and an unpaved public trail. For WHI, of the above amount, approximately 5.39 acres of the site (approximately 30 percent), including Strap Ravine and the associated floodplain, would be retained as restricted open space. For WHII, of the above amount, approximately 10.8 acres of the site (approximately 33 percent), including Strap Ravine and the associated floodplain, would be retained as restricted open space.

As noted on page 11-41 of the Draft EIR, for areas where development is proposed, all proposed grading improvements would conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code). The proposed grading plans would be subject to review by the Placer County Engineering and Surveying Division. Based on the above, grading would be limited to the maximum extent feasible within the project sites.

Response to Comment 17-7

Exhibit C included by the commenter is an internal memo from Placer County Environmental Health to the Planning Department (dated March 1, 2006), which references soil sampling conducted on the WHI project site (formerly known as “Beaver Creek”) in February 2006 by Geocon Consultants, Inc. The memo summarizes discussion between Placer County Environmental Health staff and DTSC regarding said sampling, and indicates that DTSC recommended additional, deeper sampling in areas of potential disturbance such as the proposed bridge site, future utilities, and lots located on tailings (future swimming pools, etc.). As noted on page 9-6 of the Draft EIR (Chapter 9, Hazards and Hazardous Materials), as a result of this recommendation, Geocon conducted deeper testing at WHI for the presence of elevated levels of metals in tailings. More specifically, Geocon excavated five additional exploratory trenches to facilitate observation and sampling of deeper tailings. Each trench was excavated to approximately 10 feet below ground surface (bgs). Representative tailings samples were collected from depths of five and 10 feet bgs. Geocon reported that concentrations of lead and mercury from the deeper tailings samples collected from the WHI site are below the regulatory guidelines for residential soil (Cal-EPA CHHSLs and USEPA PRGs) and appear to be consistent with naturally-occurring background levels of the above metals. Geocon determined that the lack of detections of mercury above background levels in 31 to 34 samples collected from the site, including all ten deeper samples, suggests that impacts from past mining activity were minimal and further environmental investigation of soil and tailings was not warranted.

As discussed on page 9-7 of the Draft EIR, subsequent to Geocon’s 2006 sampling, in July 2014, Wallace Kuhl Associates collected additional soil samples at the WHI property, the objective of which was to evaluate dredge tailings and locations identified to contain imported soil. The results show that the levels detected for all CAM 17 metals do not pose a risk to human health or the environment based on a residential land use.

Similar conclusions were reached for WHII, as noted on page 9-9 of the Draft EIR.

The soil sampling for the project sites was conducted consistent with applicable standards, including DTSC and EPA. The National Institute for Occupational Safety and Health (NIOSH) standards referenced by the commenter do not represent industry standard guidance for soil sampling of development sites.

Response to Comment 17-8

See Response to Comment 17-7.

Response to Comment 17-9

Provision of a 3-D rendering is not necessary, nor required by CEQA, to determine whether the proposed projects, or the alternatives evaluated in Chapter 18, could result in visual impacts. Such an evaluation is often done qualitatively, as is the case for the WHI and WHII analysis, with the exception of the various 2-D figures and the 3-D rendering provided in Figure 4-5 of the Aesthetics chapter. Figure 4-5 provides a typical view of the WHII site from the backyard of one of the nearest

existing residences, located at the terminus of Farschon Place, along with a visual simulation illustrating the potential changes in visual character that could result from implementation of the WHII project. As shown in Figure 4-5, existing vegetation within the proposed open space – common area at the site’s southern boundary would help to screen views of the proposed residences; existing sensitive viewers to the south of the WHII site would have very limited views of proposed homes.

Elsewhere the Draft EIR includes 2-D exhibits (Figures 4-4, 4-6, and 4-7), showing proposed setback dimensions of the WHI and WHII residences from the nearest existing homes. The discussion acknowledges that noticeable changes in visual character of the project sites would occur as a result of the projects. However, the threshold of significance for determining visual impact is whether the changes would *substantially* degrade the visual character of the project site or area (emphasis added; see pg. 4-11 of the Aesthetics chapter for the thresholds of significance). The aesthetics analysis presented on pp. 4-12 through 4-21 of the Draft EIR, along with the associated figures, demonstrates that adequate setbacks have been included in the proposed projects so as to ensure that the visual character of the sites/area would not be *substantially* degraded, as viewed by the nearest sensitive receptors.

For example, for both WHI and WHII, as a result of the required 300-foot scenic setback from Douglas Boulevard, changes to views of the project sites for motorists, bicyclists, and pedestrians traveling on Douglas Boulevard would be limited to frontage improvements, minor road widening, and the proposed gated entryway; all other on-site improvements would be screened from view by the intervening oak woodland on the northern portion of the site.

With respect to alternatives, the Draft EIR determined that both the Buildout Pursuant to Existing Zoning Alternative and the Reduced Density Alternative would have fewer aesthetic impacts than the proposed projects. Sufficient detail is provided in the Alternatives Chapter of the Draft EIR (i.e., conceptual alternative site plans) to enable the comparative visual effects of the alternatives, without the need for 3-D renderings.

Response to Comment 17-10

Discretionary entitlements subject to CEQA review on property occupied by oak woodland of two acres or greater fall under the County’s Oak Woodland Impact Guidelines. Oak woodland is defined as a plant community in which the tree crown canopy coverage is 10 percent/acre or greater and the dominant tree species are native California oaks. Dominance is defined as canopy cover, as viewed from above, >50 percent of total canopy.

Impacts are determined by the development footprint (acres) and additional mitigation is required for any Significant Oak trees (>24 inches in diameter at breast height (DBH) or clumps with the largest stem > 24-inches DBH). The development footprint is the entire area proposed for grading, construction and/or installation of infrastructure necessary to accommodate uses on the site plus a 50-foot buffer surrounding this area.

Mitigation for oak woodland losses within the development footprint must be achieved off-site. No credit is provided for oak woodland preserved on-site. The WHI project would result in the

loss of four Significant Oaks totaling 147 inches DBH, as stated on page 6-58 of the Draft EIR, and the WHII project would result in the removal of 12 Significant Oaks totaling 777 inches DBH, as stated on page 6-61 of the Draft EIR. As also presented on page 6-58 and 6-61 of the Draft EIR, respectively, canopy impacts are 10.9 acres on WHI and 20.9 acres on WHII.

The canopy and Significant Oak impacts for the WHI project are depicted on Figures 6-4 and 6-5 respectively and for WHII, Figures 6-6 and 6-7.

Response to Comment 17-11

The first portion of the comment, before the indented bullet point, is unclear. The County cannot offer a response without entering into speculation as to the meaning of the comment.

The second part of the comment is clear and notes that the Draft EIR has not taken into account that the less dense alternatives may not require infrastructure upgrades. In response, it is noted that the Alternatives Analysis in Chapter 18 states that, similar to the proposed projects, the less intense alternatives would require extension of the water line in Douglas Boulevard so the homes could receive service (pp. 18-24, 18-38). With respect to the cumulative setting, the Alternatives Analysis notes that although the less intense alternatives would result in the generation of a reduced amount of wastewater compared to the proposed project, the alternatives would result in the contribution of some level of wastewater to the wastewater infrastructure in the project area under the cumulative project setting, and upsizing of the North Trunk present within the project sites would still be required (pp. 18-37 and 18-51).

In addition, the majority of roadway improvements identified for the proposed projects would still be required for the less intense alternatives. For example, the westbound left-turn lane lengthening at Douglas Boulevard/Seeno Avenue would still be required for the WHII alternatives (pp. 18-35 and 18-50).

Response to Comment 17-12

The point of reference in the Draft EIR to which the commenter is referring is not clear. The GBCP describes Granite Bay as "... [containing] a mix of suburban and rural-residential parcel sizes. Residential development in Granite Bay covers a spectrum of densities and architectural styles and expressions."⁵ The GBCP also assumes continued population growth in Granite Bay; with the greatest demand for housing continuing to be for single-family homes on large parcels or on somewhat smaller lots, where public services and utilities are available; and the development of higher densities of housing will occur where public services and utilities are available. As the project sites provide direct access to a major roadway and are readily connected to existing utility infrastructure, development of the project sites at a higher density of housing is not unexpected on the project sites.

⁵ Placer County Planning Services Division, Community Development/Resource Agency. 2012 (February). *Granite Bay Community Plan*. Introduction, page 5.

The comment refers to maintaining the same mix of housing types identified in the GBCP to maintain the rural character of the community recognized by both the GBCP and the Placer County General Plan. As noted in Response to Comment 9-4, in *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, the Appellate Court evaluated whether community character is a consideration in CEQA and whether changes to community character or social impacts constitute an environmental impact under CEQA. The Court determined CEQA does not require an analysis of subjective psychological feelings or social impacts. Rather, CEQA's overriding and primary goal is to protect the physical environment. CEQA defines a "significant effect on the environment" as "substantial, or potentially substantial, adverse changes in physical conditions" (PRC section 21100. subd. (d)). The physical impacts on the environment are addressed in the technical chapters of the Draft EIR.

Response to Comment 17-13

Please see Response to Comment 17-12.

Response to Comment 17-14

Please see Response to Comment 17-12.

Response to Comment 17-15

The proposed projects' incremental contribution to cumulative demands on fire protection services is addressed on page 17-44 of the Draft EIR, as follows:

As discussed in Chapter 13, Public Services and Recreation, of this EIR, the response times to the proposed projects would be consistent with General Plan Policy 4.4.2. Both projects would be subject to payment of a Fire Impact Fee, which is used to fund anticipated capital improvement needs identified in the South Placer Fire Protection District Capital Facilities Plan Update 2017 (2017 CFP). In addition, development within the proposed project sites, as well as other future development throughout Granite Bay, would be required to comply with all applicable regulations imposed by the South Placer Fire Protection District (South Placer FD) and the California Fire Code, as adopted by Section 15.04.510 of the Placer County Code.

With payment of the Fire Impact Fee, the proposed projects, in combination with future development occurring under buildout of the GBCP, would not be anticipated to result in the need for new, or physical improvements to existing, fire protection facilities, construction of which could cause significant environmental impacts, and a less-than-significant cumulative impact related to fire protection services would occur.

The above demonstrates that there are no project-level impacts to fire protection services due to the WHI and WHII projects. Cumulative demand can be appropriately addressed through payment of impact fees, as noted on page 17-72 of the Draft EIR.

Furthermore, it is noted that, in the court case *City of Hayward v. Board of Trustees of the California State University*, the First District Court of Appeal affirmed that the analysis of fire

protection services pursuant to CEQA is appropriately limited to the physical environmental impacts that may result from construction of new or expanded fire facilities needed to provide adequate fire protection services to a proposed project.⁶ Response time is not a CEQA issue per se; it can be indirectly related to an environmental effect if a new or expanded fire station, the construction of which could cause environmental effects, is needed to ensure adequate response times can be provided to a project site. As discussed above, a new or expanded fire station is not needed to ensure adequate response times are provided to the Whitehawk projects; thus, a less-than-significant impact would result, and, a National Fire Safety Standards analysis for emergency response is not required.

Response to Comment 17-16

Please see Response to Comment 3-3.

Response to Comment 17-17

Please see Response to Comment 3-3.

Response to Comment 17-18

Chapter 15, Utilities and Services Systems, of the Draft EIR provides a detailed analysis of the Granite Bay sewer system (i.e., SMD 2), based upon best available data for the Granite Bay sewer system.⁷ As discussed on page 15-31 of the Draft EIR, the analysis shows the existing sewer system can accommodate both the proposed WHI and WHII projects in addition to the proposed (“interim”) developments. “Interim” is defined as Granite Bay growth since 2010, when the sewer modeling was performed by Brown and Caldwell.

The proposed projects’ contribution to regional sewer demand, in combination with future buildout of the SMD 2 area, is addressed in detail in the Cumulative chapter of the Draft EIR. Specifically, pp. 17-70 through 17-72 provide an analysis of cumulative wastewater treatment and conveyance. Page 17-71 notes that:

The analysis completed by Brown and Caldwell...showed that portions of the SMD 2 system would experience deficiencies under buildout of the SMD 2 and SMD 3 service areas. The creation of deficiencies due to cumulative buildout of the GBCP area would be considered a significant cumulative impact. Although the majority of the identified deficiencies are upstream of the WHI and WHII project sites, areas of anticipated deficiencies exist downstream from both the WHI and WHII project sites, as well. Because anticipated areas of deficiency are located downstream from the WHI and WHII project sites, the proposed project sites would contribute increased wastewater flows to areas of SMD 2 experiencing deficiencies.

⁹# First District Court of Appeal. *City of Hayward v. Board of Trustees of the California State University*. November 30, 2015.#

⁷ This includes primarily the *Technical Memorandum: Hydraulic Model Analysis* (February 25, 2011), prepared by Brown and Caldwell.

Connection fees for wastewater are required pursuant to Section 13.12.010 of the County Code to provide for the impact of the connection on the existing capacity of the sewerage system. According to CEQA Section 15130(a)(3), paying a “fair share fee” is permissible as effective mitigation for cumulative impacts if the fees are part of a reasonable plan of actual mitigation that the relevant agency commits itself to implementing. The Placer County Board of Supervisors has determined that a development impact fee is needed in order to finance public improvements to wastewater infrastructure and to pay for the development’s fair share of the construction costs of these improvements. The proposed projects, whether implemented independently or together, would be subject to fair share fees, which is estimated at \$2,289.00 per equivalent dwelling unit (EDU).

Mitigation Measure 17-17 of the Draft EIR requires the applicants to pay the applicable sewer fair share fees prior to recordation of the Final Map(s).

In summary, the analysis within the Draft EIR relied on best available data for the SMD 2 sewer system to determine that the projects will contribute to the need to update the sewer system. The Draft EIR appropriately relied on payment of the projects’ fair share sewer impact fees towards future improvements to the existing wastewater infrastructure (Mitigation Measure 17-17) to conclude that the projects’ incremental contribution to impacts on the sewer system would be less than cumulatively considerable.

Response to Comment 17-19

The analysis done for the WHI and WHII projects is consistent with the modeling effort prepared in conjunction with the Circulation Element update. Utilizing this data, Fehr & Peers confirmed that some of the proposed projects’ traffic impacts may not be fully mitigated. It is not necessary to wait for the release of the Circulation Element update in order to accurately predict which immitigable traffic impacts could result from the WH projects. For a list of the significant and unavoidable traffic impacts resulting from the proposed project, see Section 17.6 of the Cumulative Impacts and Other CEQA Sections chapter of the Draft EIR.

Response to Comment 17-20

This comment letter cites more than one policy, so it is unclear which specific policy the commenter is referring to. The following is offered in response. Policy conflicts do not, in and of themselves, constitute a significant adverse environmental impact.⁸ A policy inconsistency is considered to be a significant adverse environmental impact when it is related to a policy adopted for the purpose of avoiding or mitigating an environmental effect. Such policies are addressed in Table 11-5, *Placer County General Plan and Granite Bay Community Plan Policy Discussion*, of the Draft EIR. As can be seen by reviewing these policies, they are designed to provide policy guidance rather than to specify regulatory requirements or prohibitions. Agencies have particularly broad discretion in determining a project’s consistency with such policies. As concluded on page 11-19 of the Draft EIR, the projects as proposed, would be generally consistent with the goals and

⁸ Stephen L. Kostka and Michael H. Zischke. *Practice Under the California Environmental Quality Act, Second Edition* [Oakland: Continuing Education of the Bar, pg. 12-44.1]. March 2018 Update.

policies of the General Plan and Community Plan that are applicable to the sites and their proposed residential land uses.

The physical environmental effects of tree loss are addressed in Chapter 6, Biological Resources, of the Draft EIR. As noted, tree loss due to the proposed projects would be fully mitigated through compliance with Mitigation Measure 6-7(a). In addition to the purchase of mitigation credits for aquatic resource impacts, Mitigation Measure 6-7(a) requires the purchase of mitigation credits for oak woodland impacts at a 2:1 ratio and impacts to cottonwood canopy at a 4:1 ratio. Such mitigation would ensure that while portions of on-site habitat would be lost, a larger amount of habitat within the region would be protected and no net-loss of habitat would occur.

As noted in the Draft EIR, for the WH projects, the applicant is planning to purchase riparian woodland mitigation credits at the Sacramento River Ranch, and for impacts to oak woodlands and cottonwood stands, fee contributions to the Placer Land Trust to assist with the purchase of the Laursen Outback property within the Lower Bear River Focus Areas of the Spenceville Conceptual Area Protection Plan.

Response to Comment 17-21

The following response will demonstrate that additional studies are not required to evaluate the effects of earthwork at the project sites. The effects of soil disturbance, including cuts and fills, are addressed throughout the technical sections of the Draft EIR. Potential contamination of Strap Ravine as a result of project earthwork is addressed in Impacts 8-3 and 10-1 of the Geology and Soils and Hydrology and Water Quality chapters of the Draft EIR, respectively. The Draft EIR determined that the projects could result in a significant impact to Strap Ravine; thus, Mitigation Measures 8-2(a), 8-2(b), 8-3(a), and 8-3(b) are required to ensure that the water quality of Strap Ravine is protected during construction.

With respect to groundwater, page 8-5 of the Draft EIR notes that permanent groundwater was not encountered within the test pits on the project sites, which extended to the maximum depth explored of approximately 10 feet below existing site grades. The permanent groundwater table is indicated to be at a depth of at least 100 feet below existing site grades. Therefore, earthwork at the project sites would not adversely affect groundwater underlying the sites. In the event that any perched groundwater is present during winter or early spring months, dewatering would be appropriately handled through the State National Pollutant Discharge Elimination Permit (Construction General Permit) required for each project.

With respect to flooding of adjacent parcels, runoff from new impervious surfaces would be routed to each project's internal storm drainage system so as to prevent runoff from flowing onto adjacent parcels. Stormwater runoff from new impervious surfaces would be routed through the proposed stormwater drainage systems, including the proposed bio-retention basins, before discharging to Strap Ravine. While some stormwater runoff would infiltrate the soils underlying the bio-retention basins, in general, the proposed stormwater systems would not be designed to provide for detention. As noted on page 10-31 of the Draft EIR, this would be consistent with the County's approach to peak flow management in the watershed. The project site is located in an area identified in the Dry Creek Watershed Flood Control Plan where local stormwater detention is not

recommended. Mitigation measures for development in this area include payment of flood control development fees to fund regional detention basins to reduce flooding on major streams in the Dry Creek watershed (see Mitigation Measure 10-3(b) of the Draft EIR).

To assess potential impacts of the WHI and WHII projects on flows within Strap Ravine in the project vicinity, both project sites were modeled with impervious surfaces ranging from 35 percent to 65 percent. It is important to note that these results reflect flows that would result from full buildout of the land uses shown in the various community plans and General Plan. Peak flow rates shown in Table 10-3 of the Draft EIR (pg. 10-32) are for Strap Ravine and include the 187 cubic feet per second (cfs) of flow through the reconstructed unnamed tributary that flows through the WHII site. As shown in the table, the 100-year post development peak flows downstream of the site were shown to increase from 838.5 cfs to 840.8 cfs, approximately 2.3 cfs (conservatively) or 0.28 percent.

While the upstream and downstream 100-year flood water surface elevations would not be significantly increased after development of the sites (0.02-foot to 0.04-foot increase), any base flood water-surface elevation (WSEL) increase from proposed construction within a regulatory floodway requires a Conditional Letter of Map Revision (CLOMR) through FEMA. The Draft EIR includes Mitigation Measures 10-3(a-c) and 10-4(a-f). It is noted that Mitigation Measure 10-4(e) requires the applicant(s) to submit a final drainage report, demonstrating that the proposed project will not significantly increase the limits or water surface elevation of the Strap Ravine 100-year floodplain upstream and downstream of the project site to the satisfaction of the Engineering and Surveying Division and the Placer County Flood Control District.

With respect to the comments pertaining to trees, Mitigation Measure 6-7(b) includes a list of tree protection methods that will be included on the project improvements plans, which would include the grading plan. Among the methods are the requirements to avoid cuts and fills around trees where feasible; to prohibit soil surface removal greater than one-foot within the driplines of oak trees to be preserved; and to prohibit earthen fill greater than one-foot within the driplines of oak trees to be preserved.

Letter 18

From: Shannon Quinn [mailto:shannoncts@gmail.com]
Sent: Sunday, January 13, 2019 1:50 PM
To: Christopher Schmidt <CRSchmid@placer.ca.gov>
Subject: WHITEHAWK I and II DEIR Comments

Chris,

18-1 Thank you for the opportunity to comment on the DEIR for Whitehawk I and II, please include these in the official record. I am appreciative of the fact that the County took the required steps to produce an EIR after it was proven that the initial MND lacked the ability to prove that all impacts were less than significant.

Unfortunately, in relation to traffic I still find the following elements lacking:

18-2 **1. PHF- Peak Hour Factor:**
The purpose of the Peak Hour Factor is to present a "worst case" indication of intersection delays.
This report utilizes a default value for PHF in the A.M. of .92 and P.M. of .94, six of the twelve intersections, then arbitrarily change to different values for the other 6 intersections only two of which reflect the actual PHF factors that are calculated on the data count sheets. Without any discussion or data sheets to show how these PHF #s were "created" by Fehr & Peers, it would reason that the PHF #s utilized should be the ACTUAL values as calculated on the data sheets. I am most concerned with the intersections that utilize a higher chosen PHF than the actual calculated PHF because they can lead to an underestimation of intersection delay. As an example Sierra College/Eureka in the A.M. Fehr utilizes .92 when the actual is .89- this intersection currently sits at a LOS D with a delay of 41.4 seconds- would the change cause it to fall to a LOS E? How would this then reflect cumulative etc. Please provide a reasoning for not utilizing calculated PHF as well as a breakdown as to how the ones that were utilized were determined.

18-3 **2. Diverted Traffic Evaluation is Faulty:**
Relying on counts taken from over 18 months ago to determine the speeds on Douglas Blvd to determine if people will cut through neighborhoods does not appear to reflect current conditions. The HCS7 calculations are based on these outdated counts as well. One only need drive Douglas and Cavitt Stallman during peak hours today, especially in the PM hours, even beginning as early as 3 PM now, and it would be apparent that these calculations as presented in this analysis are off.

18-4 Was an intersection count done at Olive Ranch and Cavitt Stallman? For drivers coming West on Douglas when they begin to hit the traffic back up they are already exiting through Douglas Ranch and Quail Oaks- this is especially attractive if they are already planning to head North on Sierra College Blvd. Adding any additional homes beyond initial zoning has the ability to divert traffic.

18-5 **3. Granite Bay Circulation Element Update should come first:**
No projects seeking an increase in density that require a rezone should be considered until the Community Plan Circulation Element has been updated by the community. Based on the 2020 population counts it is apparent that many of our roadways are currently beyond capacity (see Counts v Projections tab produced by DPW). These counts taken May 18,2017 are also quite

**Letter 18
Cont'd**

18-6 ¹ likely not even showing the true picture as the traffic has markedly increased just in the last 6 months as experienced by those of us that travel these roadways each day. Much of this increase can be attributed to all of the new housing in all surrounding areas such as Roseville, Rocklin, Folsom, and Eldorado Hills. Many of which have come to market within the last year and are not reflected in these earlier counts. Now that a significant problem has been identified, it would seem reckless to continue without an update and probably not lawful.

18-7 4. Appears to be a conflict in Daily Traffic Volumes:
Based on the #'s that were presented at the Circulation Element Update community workshop- some of the average daily traffic ADT #'s appear to be in conflict with those provided by the County. Being that Fehr & Peers produced both it would seem that they would be in agreement throughout this report.

18-8 5. Douglas Road Widening to Cavitt:
It is apparent from the comments that were received by the City of Roseville that "any" expansion East of Sierra College on Douglas should trigger the road widening up to Cavitt Stallman South. The creative attempt to say that it isn't triggered until the second project seems to be negated by their letter. Especially when you consider this entire calculation produced by Fehr relies on May 2017 counts. Again, due to exploding population counts in surrounding cities that utilize our roadways these counts don't reflect current conditions.

18-9 In addition, I would still question the actual population counts and impacts:
At a recent MAC meeting, Supervisor Uhler produced a slide that showed a study commissioned by the Department of Public Works which was a "rooftop count" in 2017 which showed the following:
Total households 7632. US Census data shows an estimated average of 3.3 per household, which would put us at 25,185. Granite Bay has a holding capacity of 26,000 so a Cumulative analysis should be included in this DEIR. Based on ACT counts between 2015 to 2016 Granite Bay grew from 22,387 to 22,840. For the first time in many years Eureka School District began experiencing an expanding enrollment as of 2016- this would imply that our population is growing and the effects of increasing density have the potential to create impacts and therefore should be included for evaluation.

Thank you for your consideration.

Sincerely,
Shannon Quinn

LETTER 18: SHANNON QUINN, LETTER 3 OF 3

Response to Comment 18-1

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

Response to Comment 18-2

The traffic analysis employs a “global” peak hour and “global” peak hour factor (PHF) for intersections along corridors and in zones where intersections are clustered together in close proximity. The peak hour is identified based on the total traffic at all intersections in that zone. The global PHF is calculated by dividing the total peak hour traffic volume for the zone by the peak 15-minute traffic flow for the zone, per the PHF formula. This results in a global PHF of 0.92 in the AM peak hour and 0.94 in the PM peak hour for Intersections 1-5, 8, and 9 along Douglas Boulevard and Sierra College Boulevard; and a global PHF of 0.90 in the AM peak hour and 0.96 in the PM peak hour for Intersections 7, 11, and 12 along the Auburn Folsom Road corridor. Intersections 6 and 10 are isolated, and therefore use the observed PHF as shown in the traffic count data sheets.

In response to the comment, Fehr & Peers conducted spot analyses of intersections where the individual intersection PHF was lower than the global PHF used in the analysis. The resulting change in delay was no more than 2.5 seconds and did not result in a change in LOS.

Response to Comment 18-3

The May 2017 traffic counts reflect conditions at the time the NOP was released in January 2018. Major land developments or roadway projects in Granite Bay, eastern Roseville, or northern Folsom have not occurred that would have greatly changed traffic levels between May 2017 and January 2018. Therefore, the May 2017 count data is appropriate to use for the HCS7 analysis.

In response to the comment, Fehr & Peers reviewed publicly available traffic count data from the City of Roseville for the intersections of Douglas Boulevard/Sierra College Boulevard, and Douglas Boulevard/Cavitt Stallman Road South, for May 2017, May 2018, October 2018, and January 2019 to verify that traffic volumes have not greatly changed. The daily, AM peak hour and PM peak hour traffic volumes in May 2018 and October 2018 were roughly equal to May 2017 with a maximum deviation of +/-5 percent, which is within the typical range of day-to-day fluctuations. Traffic volumes in January 2019 were generally lower than May 2017 (from roughly equal to a 10 percent decrease).

Response to Comment 18-4

The traffic analysis shows that the projects will not add trips to Olive Ranch/Cavitt Stallman Road intersection, or cause existing traffic to divert to Olive Ranch Road as an alternate to Douglas Boulevard. Therefore, a traffic count was not collected at this intersection.

Response to Comment 18-5

The diverted traffic concern was identified in comment letters on the NOP from February 2018. Therefore, the WHI and WHII traffic study included a diverted traffic evaluation as presented in the report. The traffic counts show minimal westbound traffic on Douglas Boulevard turning right onto Seeno Avenue or Quail Oaks Drive in the PM peak hour to avoid congestion on Douglas Boulevard (18 westbound right-turns at Seeno Avenue; four westbound right-turns at Quail Oaks Drive). These are reasonable amounts of trips into these neighborhoods given the number of residential units. Higher AM peak hour westbound right turns at Seeno Avenue correspond with the start of the school day at Greenhills Elementary. These traffic counts further support the conclusion that diverted traffic from Douglas Boulevard is minimal, even during the busiest (i.e., peak) hours of the day; and that the few trips generated by the proposed projects are not likely to result in an increased diversion of trips from Douglas Boulevard.

Response to Comment 18-6

Please see Responses to Comments 13-2 and 18-3.

Response to Comment 18-7

Fehr & Peers reviewed the ADT numbers presented at the Circulation Element Update workshop on January 9, 2019 and the data presented in Table 5 of the WHI and WHII Traffic Impact Study, and verified that the ADT data is consistent with each other. The graphics presented at the Circulation Element Update workshop do not label every segment due to the scale of the graphic. Therefore, the data in Table 5 is presented at a greater level of detail than the workshop graphics, which may have led to the confusion.

Response to Comment 18-8

The project's impact and need for mitigation is determined by Placer County's Impact Analysis Methodology of Assessment memorandum. This memorandum states that the project would trigger a significant roadway segment impact and therefore require mitigation if the project adds 100 ADT or more per lane. Because this segment of Douglas Boulevard is four lanes, the project would need to add more than 400 ADT to trigger an impact. WHI is forecasted to add 170 ADT to this segment, which does not meet this threshold and therefore does not trigger an impact or require mitigation. Similarly, WHII by itself is forecasted to add 370 ADT to this segment, which also does not meet this threshold and therefore does not trigger an impact or require mitigation. Only the combination of both WHI and WHII exceeds the 400 ADT trigger, with a combined addition of 540 ADT to this segment. This is disclosed as Impact 14-3 and mitigated by Mitigation Measure 14-3 in the Draft EIR.

Response to Comment 18-9

Traffic counts are not a reliable indicator of population growth in Granite Bay because a substantial portion of the traffic is through-traffic from and to neighboring jurisdictions, including Folsom and Roseville.

The GBCP estimated the maximum potential build-out for the GBCP area based upon the Land Use Designations in the Plan at the time. This was a forecast of what the future population would be, based upon the combined acreage of those undeveloped properties within the Plan Area. These growth and population projections are not population caps but an estimate of what the population could be in 2035 based upon “low growth” and “high growth” scenarios. The “low-growth” scenario projected that one-third of unbuilt housing units permitted by the 2012 land use designations and zoning are constructed by 2035. The second assumed a “moderate” development rate with two-thirds of the housing units constructed. Both scenarios assumed that changes to the Land Use diagram to permit higher densities would not occur.

Based on 2012 Land Use Designations and acreages of all properties (developed and undeveloped), there is a potential of 10,493 housing units in the Plan area (there were 7,580 housing units in the Plan area in 2012). Utilizing the household size of 2.75 persons per household (2010 Census), the Land Use Plan has an ultimate estimated “population holding capacity” of 28,855 persons (page 18 in the Population and Housing chapter of the GBCP). Because many areas of Granite Bay have been developed at less than permitted density, the population of Granite Bay would not be expected to reach the 28,855 population level, unless many significant land use changes are made in the future. Therefore, a population of 26,000 at full build-out was deemed a “reasonable assumption.”

In early 2018, the Planning Department analyzed residential building permit data for the number of completed homes since the adoption of the GBCP and the number under construction homes at that point in time in 2018. Staff also compiled information on approved, under-development, and proposed residential projects in the Plan area. This information was used in the wastewater capacity discussion in Section 15-2 of the Draft EIR. Since 2010, 222 new primary and secondary dwelling units have been completed and five units have been demolished for a net of 217 new units. In addition, 28 units were under construction, including primary and secondary units and one demolition permit issued but not finalized, for 27 net new units in process. Since 2010, one congregate care home with 86 beds had been completed.

A number of subdivisions approved since 2010 have come online and still contain vacant lots within them. In addition, new residential projects and congregate care facilities have been approved but have not started construction. Furthermore, other projects such as WHI and WHII have been proposed but not approved. Such approved or possibly future projects include an estimated 456 housing units and 340 congregate care beds.

Based upon the 2010 Census per persons per household count of 2.75, a net increase of 217 residential units and 86 congregate care beds in the 2010 to 2018 time period, the population has increased from 20,825 in 2010 to an estimated 21,508 in 2018, or a total of 3.28 percent.

It should be noted that this 21,508 Granite Bay population estimate for 2018 is slightly reduced from what was included on pages 11-9, and 11-22 through 11-24 of the Draft EIR. The difference is due to a minor calculation error. The Draft EIR estimate is hereby revised on page 11-9 as follows:

Population

According to the 2010 U.S. Census, the population of Granite Bay in 2010 was 20,825⁷. As part of this EIR, the County conducted an analysis of the number of residential units that have been built since 2010, as well as the number of units that are under construction. The resultant Granite Bay population, as of April 2018, is approximately 21,818579⁸.

Corresponding footnote 8 is revised as follows:

Based on 7,910824 units * 2.747 persons per household + 86 new assisted living beds.

The population references on pages 11-22 and 11-24 are similarly revised.

Letter 19

Shirlee Herrington

From: Larissa Berry <lzberry@peoplepc.com>
Sent: Sunday, January 13, 2019 2:40 PM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil; Clayton Cook
Cc: Ashley Brown; GBCA; defendgb@gmail.com; AEL-Leslie Warren
Subject: Time extension request for upcoming DEIRs

Good evening,

19-1 Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

19-2 Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be **less than 150** pages and **for proposals of unusual scope** or complexity should normally be **less than 300.**"

19-3 The County has "dumped" 3 DEIR's upon the public in an unreasonable timeframe. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles.

19-4 The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

19-5 The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

**Letter 19
Cont'd**

19-6

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request,

Larissa Berry

LETTER 19: LARISSA BERRY, LETTER 4 OF 4

Response to Comment 19-1

The County has elected not to extend the public comment period for the Draft EIR beyond the State-mandated 45-day period.

Response to Comment 19-2

Please see Response to Comment 5-1.

Response to Comment 19-3

The comment states that the Draft EIR relies on vague language and relies on analysis of economic feasibility, but does not note a specific deficiency within any particular portion of the analysis presented in the Draft EIR. With regard to aesthetic resources and 3-D imagery, please see Response to Comment 17-9.

Response to Comment 19-4

Contrary to the comment, the purpose of the EIR, pursuant to CEQA Guidelines Section 15121, and as noted on page 1-2 of the Draft EIR, is to (a) inform public agency decision-makers, and the public generally, of the significant environmental effects of the project, (b) identify possible ways to minimize the significant adverse environmental effects, and (c) describe reasonable and feasible project alternatives which reduce environmental effects.

Response to Comment 19-5

The comment does not address the Draft EIR, but references other EIRs released by the County. The commenter's concerns have been forwarded to the decision-makers for their consideration.

Response to Comment 19-6

Please see Response to Comment 5-1.

Letter 20

Shirlee Herrington

From: Amber Beckler <zagnut@hotmail.com>
Sent: Sunday, January 13, 2019 4:04 PM
To: Shirlee Herrington; EJ Ivaldi; CRSchimd@placer.ca.gov; Crystal Jacobsen; KKeding@placer.ca.gov
Subject: Request for extension on WH I and II

20-1 Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

20-2 Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300."

20-3 The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles.

20-4 The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

20-5 The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

20-6 This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the

**Letter 20
Cont'd**

20-7

↑ documents to provide an opportunity to understand the projects impacts should be extended to afford t
community its guaranteed right to comment.

Thank you in advance for your consideration of my request.

Thank you,

Amber Beckler
8970 Benton Acre Rd
Granite Bay, CA 95746

LETTER 20: AMBER BECKLER

Response to Comment 20-1

Please see Response to Comment 19-1.

Response to Comment 20-2

Please see Response to Comment 5-1.

Response to Comment 20-3

Please see Response to Comment 19-3.

Response to Comment 20-4

Please see Response to Comment 19-4.

Response to Comment 20-5

Please see Response to Comment 19-5.

Response to Comment 20-6

Please see Response to Comment 19-6.

Letter 21

Shirlee Herrington

From: Peggy Peterson <peggyjust@yahoo.com>
Sent: Sunday, January 13, 2019 5:23 PM
To: Shirlee Herrington; ejevaldi@placer.ca.gov; Christopher Schmidt; Crystal Jacobsen; Kally Keding-Cecil
Subject: Request for comment deadline extension

- 21-1** Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIRs recently released.
- 21-2** Comments for WHI and II are due by 5:00 pm 1/14. This is a MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totaling roughly 80 homes. CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300." The County has "dumped" 3 DEIRs upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles. The intent of these EIRs appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.
- 21-3** The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, and as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.
- 21-4**
- 21-5**
- 21-6** This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the date for review should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request,

Peggy Just Peterson
Granite Bay, CA

LETTER 21: PEGGY PETERSON

Response to Comment 21-1

Please see Response to Comment 19-1.

Response to Comment 21-2

Please see Response to Comment 5-1.

Response to Comment 21-3

Please see Response to Comment 19-3.

Response to Comment 21-4

Please see Response to Comment 19-4.

Response to Comment 21-5

Please see Response to Comment 19-5.

Response to Comment 21-6

Please see Response to Comment 19-6.

Letter 22

Shirlee Herrington

From: Bj <bjmakesithappen@aol.com>
Sent: Sunday, January 13, 2019 8:22 PM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedingen-Cecil
Subject: Strongly opposed to Whitehawk Development in Granite Bay

22-1 Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released.

22-2 Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be less than 150 pages and for proposals of unusual scope or complexity should normally be less than 300."

22-3 The County has "dumped" 3 DEIR's upon the public in an unreasonable time-frame. These documents contain massive sections of repetitive text, analyses which require keeping multiple tabs open to tie back to number and letter references, use vague language, rely on project economic feasibility and inadequately provide clear and recommended 3D imagery depicting the project from reasonable angles.

22-4 The intent of these EIR's appear to be to confuse, belabor and hide very significant impacts in direct conflict with the intent of DEIRs.

22-5 The Placer Retirement Residence DEIR exceeds recommended length and offices associated with licensing of senior and assisted living facilities are closed due to the shutdown. Impacts for the SIA/PR project are far reaching and of significant impact on the entire county. This project will destroy thousands of acres of farmlands, wetlands, destroy endangered vernal pools, mitigate off-site endangered species = "kill and pay an in-lieu fee", and add to traffic corridors with 10,000 addition homes without providing adequate affordable housing. Information from departments involved in affordable housing and the destruction of endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

22-6 This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request.

BJ Baker

Waterford II HomeOwners Assoc.

Assistant Secretary

LETTER 22: BJ BAKER

Response to Comment 22-1

Please see Response to Comment 19-1.

Response to Comment 22-2

Please see Response to Comment 5-1.

Response to Comment 22-3

Please see Response to Comment 19-3.

Response to Comment 22-4

Please see Response to Comment 19-4.

Response to Comment 22-5

Please see Response to Comment 19-5.

Response to Comment 22-6

Please see Response to Comment 19-6.

Letter 23

Shirlee Herrington

From: hollyjesq@aol.com
Sent: Monday, January 14, 2019 11:09 AM
To: Placer County Environmental Coordination Services
Cc: Christopher Schmidt
Subject: Re: Whitehawk I and II - Draft EIR - ADDITIONALLY Placer Retirement Residence Draft EIR and Cumulative Projects

Thank you.

23-1 It should also be noted that there are several draft EIRs that have been released recently by Placer County, whereby individually and cumulatively they are exceeding the page limitation and the burden placed on the public to adequately respond, which is not reasonable. Request is hereby made for the extension of time to respond to these projects and proposed revisions. My understanding is that the documents and projects proposed include, but are not limited to, Whitehawk I and II; Sunset Area Plan; Placer Retirement Residence draft EIR; Tiny Houses proposed amendments to the Placer County Code; Placer Ranch; Sunset Industrial Area/Placer Ranch draft EIR; and proposed Zoning Text Amendments to the Placer County Code.

23-2 Further, the Placer Retirement Residence draft EIR exceeds the page limitation set forth in regulation under CEQA. The offices associated with licensing and the facilities are closed due to the shutdown. Impacts for the Sunset Industrial Area/Placer Ranch project are far reaching and of significant impact on the entire county. The project will destroy thousands of acres of farmlands, wetlands, endangered species and add to traffic corridors with 10,000 additional homes without providing adequate affordable housing. Information from departments involved in affordable housing and destruction of endangered species are closed due to the federal government shutdown and, as a result, the public is denied access at this time to critical information that would allow pertinent statements.

23-3 It is respectfully submitted that there be an extension of time to respond to these projects. Please allow the public to adequately respond to the numerous projects and voluminous documents set forth by Placer County, and for the County to comply with federal and state mandates.

Thank you,

Holly Johnson

-----Original Message-----

From: Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
To: Holly <hollyjesq@aol.com>
Cc: Christopher Schmidt <CRSchmid@placer.ca.gov>
Sent: Mon, Jan 14, 2019 10:24 am
Subject: RE: Whitehawk I and II - Draft EIR

Thank you for your interest in the subject project and for taking the time to provide comments. This is to confirm that your comments have been received. Also, you are on our master email and/or USPS distribution list for the subject project and, as such, you will receive updates and notifications of future opportunities to for public participation and input.

Thanks.

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

LETTER 23: HOLLY JOHNSON, LETTER 2 OF 2

Response to Comment 23-1

Please see Response to Comment 5-1.

Response to Comment 23-2

The comment references two development projects that are unrelated to the proposed projects. Nonetheless, the commenter's concerns have been forwarded to the decision-makers for their consideration. The comment does not address the adequacy of the Draft EIR.

Response to Comment 23-3

Please see Response to Comment 5-1.

Letter 24

Shirlee Herrington

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, January 14, 2019 11:56 AM
To: Shirlee Herrington; EJ Ivaldi; Christopher Schmidt; Crystal Jacobsen; Kally Kedinger-Cecil; Clayton Cook
Subject: Request for extension of Environmental Document Reviews

Good morning,

24-1 Due to the government shut down, several key offices related to the environment and housing are closed. I am respectfully requesting a reasonable time extension on my behalf and on behalf of those who feel strongly about commenting on DEIR's recently released at the same time for public review and input: The Sunset Area Plan/Placer Ranch Specific Plan, Placer County Government Center Master Plan Update, WhiteHawks I & II DEIR, and Placer Retirement Residence DEIR. Information from departments involved in affordable housing and the destruction of
24-2 endangered species are closed, as such, we the public are being denied access to critical information that would allow for pertinent and accurate statements.

24-3 Several residents have expressed concerns with the timing of multiple environmental documents, the excessive length of the documents, the complexity of the environmental documents, and Placer hearings scheduled so close to religious holidays. Resident appeals to postpone the documents and extend these document deadlines has also been expressed in public meetings. In addition to the environmental documents released at the same time, the WhiteHawks Planning Hearing, the Zoning Text Amendment Board of Supervisors Hearing and Tiny Houses on Wheels Board of Supervisors hearing were scheduled placing heavy burden on residents.

24-4 Comments for WHI and II are due by 5:00 pm 1/14. This MASSIVE 740+ page document with appendices as long as 400+ pages for traffic. This length far exceeds the intent to clearly and easily communicate the impacts for projects totally roughly 80 homes.

CEQA 15141 states: "The text of draft EIRs should normally be **less than 150** pages and **for proposals of unusual scope** or complexity should normally be **less than 300.**"

This page limit recommendation is to allow the public to CLEARLY and EASILY understand the environmental impacts of a project. Since these guidelines have been blatantly ignored, the intent of

**Letter 24
Cont'd**

24-4

↑
the documents to provide an opportunity to understand the projects impacts should be extended to afford the community its guaranteed right to comment.

Thank you in advance for your consideration of my request,

Cheryl Berkema

LETTER 24: CHERYL BERKEMA, LETTER 4 OF 5

Response to Comment 24-1

Please see Response to Comment 19-1.

Response to Comment 24-2

The federal government shutdown has no bearing on being able to perform an adequate review of the Draft EIR. Federal housing agencies do not have input or authority over the WH projects, and no federally threatened or endangered plant or wildlife species were identified as having the potential to be adversely impacted as a result of the projects. Nevertheless, with respect to federal resource agencies, the applicant will be required to coordinate with them to obtain necessary federal permits (i.e., Section 404 Nationwide Permit (or Letter of Permission) from the United States Army Corps of Engineers).

Response to Comment 24-3

The County has elected not to extend the public comment period for the Draft EIR beyond the State-mandated 45-day period.

Response to Comment 24-4

Please see Response to Comment 5-1.

Letter 25

Shirlee Herrington

From: Laura Wilkin <laurawilkinxx@gmail.com>
Sent: Monday, January 14, 2019 3:42 PM
To: Shirlee Herrington
Subject: Whitehawk I and II

- 25-1 I am a resident of the Quail Oaks subdivision on Douglas Blvd in Granite Bay.
I am writing to convey my concerns about the unbridled expansion of development in Granite Bay, especially as it relates to Whitehawk I and Whitehawk II.
- 25-2 These projects, if they move forward, will have a direct and negative impact on my daily life due to the increased traffic and safety issues they would cause. A full EIR is needed to explore and address the traffic anticipated traffic congestion and lane expansion, and the impacts on water, sewer, and emergency services in our neighborhood. The draft EIR did not adequately address any of these issues.
- 25-3 Whitehawk I and Whitehawk II do NOT comply with our carefully-drafted, award-winning Granite Bay Community Plan, which was designed with abundant public input to allow for controlled growth while maintaining the rural setting and high quality of life that attracted us to Granite Bay years ago.
- 25-4 I hope that you will consider the strong and specific wishes of Granite Bay residents by adhering to the Granite Bay Community Plan, and stopping developments that run counter to the expressed desires of this community.

Laura Wilkin

LETTER 25: LAURA WILKIN

Response to Comment 25-1

The comment expresses a concern about development in Granite Bay and has been forwarded to the decision-makers.

Response to Comment 25-2

The commenter expresses concern regarding issues related to traffic, water supply, sewer, and emergency services, and claims that the Draft EIR did not adequately address any of these issues. However, no specific examples are provided. In keeping with CEQA Guidelines Section 15088(c), as recently amended by the State, the level of detail contained in a response may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). The following general responses are offered in response to the comment.

- Traffic – A technical traffic impact study was prepared by Fehr & Peers Transportation Consultants to evaluate the potential traffic impacts resulting from both the WHI and WHII projects. The traffic impact study included an evaluation of project-level impacts and cumulative impacts, resulting from development of the WH projects, in combination with other approved, pending, and reasonably foreseeable projects. The traffic impact study included traffic counts at several intersections and roadway segments, which were proposed by the traffic consultant and approved by Placer County Department of Public Works staff. Using the most recent Granite Bay Circulation Element update traffic model (see Response to Comment 4-2), project-level and cumulative-level impacts were identified and mitigated to the extent feasible. The results of the traffic impact study were incorporated in the Draft EIR. Issues related to traffic are addressed in Chapter 14, Transportation and Circulation, of the Draft EIR, as well as Chapter 17, Cumulative Impacts and Other CEQA Sections (see pp. 17-47 to 17-69).
- Water Supply – Issues related to water supply are discussed in Chapter 15, Utilities and Service Systems, of the Draft EIR. As discussed on pages 15-33 through 15-34, the San Juan Water District (SJWD) has provided Placer County with letters of water availability for the projects, informing the County that SJWD maintains adequate water supplies to serve the WH projects.
- Sewer – Issues related to sewer are discussed in Chapter 15, Utilities and Service Systems, of the Draft EIR. As noted on page 15-22, the proposed projects would not exceed wastewater treatment capacity of the Dry Creek Wastewater Treatment Plant. Please refer to Response to Comment 17-18 for discussion related to the Draft EIR analysis of sewer conveyance infrastructure.
- Emergency Services – Issues related to emergency services are discussed in Chapter 13, Public Services and Recreation, of the Draft EIR. As noted therein, the proposed projects, either separate or combined, would result in less-than-significant impacts related to fire and police protection services.

Based on the above, the Draft EIR adequately addresses the issue areas referenced by the commenter.

Response to Comment 25-3

The comment does not address the adequacy of the Draft EIR, but states that the projects do not comply with the GBCP. The proposed projects require amendments to the General Plan/GBCP to change the land use designations of the project sites (see Draft EIR, pg. 3-27). General Plan and GBCP amendments are discretionary actions that require approval from the legislative body, in this case, the Placer County Board of Supervisors. Please see also Response to Comment 9-5.

Response to Comment 25-4

The comment expresses concern regarding the projects rather than the Draft EIR. The comment has been forwarded to the decision-makers.

Letter 26

Shirlee Herrington

From: William Peterson <bpeterson1958@gmail.com>
Sent: Monday, January 14, 2019 4:20 PM
To: Placer County Environmental Coordination Services
Subject: Whitehawk 1 & 2

26-1 Hi: I have lived on Quartzite Circle since the early 1990's. I was required to abide by Strap Ravine Homeowners Association CC&R's to get my remodel county permits. These CC&R's are filed at Placer County and require all property owners to follow them.

26-2 They do not allow the properties to be split up. This stops the Wringers from legally selling part of their property giving Whitehawk a emergency access road. If the county allows the rules to be broken that would eliminate Strap Ravines HOA ability to enforce any of the CC&R's. The county has required approval from the HOA before permitting any changes to members property.

26-3 Whitehawk 1 & 2 go against curren zoning of the area. The Environmental Impact Report for this property states this property and the properties surrounding these two sites are low density single family land. In addition much of the natural
26-4 protected vegetation would have to be removed.

26-5 The owners say they are two different companies, what they don't say is the primary owners are the same. Another, major issue is there is property
26-6 in between the two subdivisions, which will be developed also. Whitehawk 1 is .75 acres per house and Whitehawk 2 is .6 per house. This does not count the common area and roads and parking areas.
26-7 Which will cause Whitehawk to be a very high density area. This will dramatically change the rural area that so many landowners invested in to enjoy the spacious area.

**Letter 26
Cont'd**

26-8 Traffic is a major issue in the Granite Bay area, which was the major concern of MAC at the meeting in early December. Whitehawk 1 & 2 will put another estimated 240 cars in Granite Bay.

26-9 The Whitehawk's developments could lower property values on Quartzite Circle and surrounding areas for all homeowners as well as cause additional traffic and congestion on Douglas Blvd., Barton, Eureka and East Roseville Parkway.

26-10 Finally, I believe if the county leaders approve these new developments, which so many landowners are against would be a slap in their faces and could create a major movement to get new leaders that care about their constituents. I am against these changes in zoning

Bill Peterson (owner)
8952 Quartzite Circle
Granite Bay CA 95746

LETTER 26: BILL PETERSON

Response to Comment 26-1

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

Response to Comment 26-2

The conveyance of an easement does not result in a property being “split up”. In addition to the proposed EVA easement, the Wringer’s property also includes a waterline easement granted to SJWD for a pipe serving the Quartzite properties. The CC&Rs (Article IV, Section 4) specifically refer to a prohibition against any lot being further divided without the prior consent of the Association and the County of Placer. An example of this would be Unit 2 of Strap Ravine Estates, recorded in 1978, which included a 9.91-acre lot which was split and sold in 1987 by the Wringers.

Response to Comment 26-3

The comment does not address the adequacy of the Draft EIR, but states that the projects go against current zoning of the area. The proposed projects require rezones (see Draft EIR, pg. 3-27). Zone changes are discretionary actions that require approval from the legislative body, in this case, the Placer County Board of Supervisors. Please see also Response to Comment 9-5. It should be noted that the current zoning district for both sites is Residential Agricultural (RA) and would remain as such. The rezones are related to changing the minimum building site and planned development combining district densities.

This comment has been forwarded to the Planning Commission and Board of Supervisors for consideration during their respective deliberations on the proposed projects.

Response to Comment 26-4

“Protected” vegetation as referred to by the commenter, could be considered oak woodlands. The environmental effects of tree loss are addressed in Chapter 6, Biological Resources, of the Draft EIR. As noted, tree loss due to the proposed projects would be fully mitigated through compliance with Mitigation Measure 6-7(a). In addition to the purchase of mitigation credits for aquatic resource impacts, Mitigation Measure 6-7(a) requires the purchase of mitigation credits for oak woodland impacts at a 2:1 ratio and impacts to cottonwood canopy at a 4:1 ratio. Such mitigation would ensure that while portions of on-site habitat would be lost, a larger amount of habitat within the region would be protected and no net-loss of habitat would occur.

Response to Comment 26-5

The comment does not address the adequacy of the Draft EIR.

Response to Comment 26-6

Page 17-83 of the Draft EIR states the following regarding potential future development of the Mac Bride parcel located between the WHI and WHII sites:

As a result of public comments received during the NOP public review period, this EIR includes a discussion of whether development of the WHI and WHII projects, individually or combined, would incentivize/induce development of the 19.2-acre Mac Bride parcel located between the WHI and WHII sites. As discussed in Chapter 14, Transportation of this EIR, north of Lot 1 in WHI and between Lots 1 and 2 in WHII, 26-foot-wide easements would be provided to the property lines of the Mac Bride property to accommodate potential future roadway connections. In addition, an easement between Lots 17 and 18 of WHI would allow for a future trail connection to and through the Mac Bride Family Trust property. The provision of direct access to the Mac Bride parcel as part of the proposed projects would help avoid the addition of another intersection on Douglas, and would pre-determine the vehicular circulation for the future redevelopment of the parcel.

The Mac Bride parcel is not owned or controlled by the project applicant and is improved with an existing single-family residence and numerous outbuildings. While the WHI and WHII projects are proposing to stub internal roadways at their common property boundaries with the Mac Bride property, access to the Mac Bride property as currently developed would still be from Douglas Boulevard, and this access has been in existence for many years and serves as the current owner's sole access. Therefore, the proposed project would not provide access to an area for which existing access is not available. Furthermore, the Mac Bride parcel is currently designated Rural Low Density Residential and Rural Residential. The parcel is zoned Residential Agricultural, minimum Building Site of 100,000 sf (RA-B-100) and Residential Single-Family, combining Agriculture, minimum Building Site of 100,000 square feet [sf], combining Planned Residential Development of one unit per acre (RS-AG-B-100 PD=1). Such existing designations substantially limit the development potential of the parcel. The estimated development potential is eight units, though the on-site natural resources (e.g., Strap Ravine) may further limit the development potential. Thus, development of the Mac Bride parcel with an increased density of residential uses would require an amendment to the GBCP and a Rezone, which are both legislative acts requiring action by the County Board of Supervisors. Separate studies, conceptual plans, and environmental review under CEQA would also be required to consider the environmental effects of increased densities at the Mac Bride property. The potential for the proposed projects to directly enable such development is speculative, rather than a foregone conclusion.

Based on the above, the Mac Bride parcel would not be developed as part of either of the proposed projects, and future development of the parcel would not be a direct or indirect result of the projects.

Response to Comment 26-7

If the overall acreage of WHI was divided by the number of proposed lots it would equate to an average of 0.75 acre per lot, but that does not accurately reflect the proposed density of 1.33 units

per acre or the 54% (9.8 acres) of open space preserved as part of the planned development, including areas along the edges to buffer the adjacent rural areas.

If the overall acreage of WHII was divided by the number of proposed lots it would equate to an average of 0.6 acre per lot, but that does not accurately reflect the proposed density of 1.67 units per acre or the 47% (15.5 acres) of open space preserved as part of the planned development, including areas along the edges to buffer the adjacent rural areas.

This is not considered high density residential, per the density standards of four to ten units per acre included in the GBCP. The commenter's concern about changing the rural area is not a CEQA issue, as discussed further in Response to Comment 9-4.

Response to Comment 26-8

The County recognizes the importance of traffic circulation in the Granite Bay area. Traffic was studied in detail as part of the Draft EIR. A technical traffic impact study was prepared by Fehr & Peers Transportation Consultants to evaluate the potential traffic impacts resulting from both the WHI and WHII projects. The traffic impact study included an evaluation of project-level impacts and cumulative impacts, resulting from development of the WH projects, in combination with other approved, pending, and reasonably foreseeable projects. The traffic impact study included traffic counts at several intersections and roadway segments, which were proposed by the traffic consultant and approved by Placer County Department of Public Works staff. Using the most recent Granite Bay Circulation Element update traffic model (see Response to Comment 4-2), project-level and cumulative-level impacts were identified and mitigated to the extent feasible. The results of the traffic impact study were incorporated in the Draft EIR. Issues related to traffic are addressed in Chapter 14, Transportation and Circulation, of the Draft EIR, as well as Chapter 17, Cumulative Impacts and Other CEQA Sections (see pp. 17-47 to 17-69).

Response to Comment 26-9

Analysis of issues related to property values is not required under the State CEQA Guidelines and, thus, such analysis is not included in the Draft EIR. Specifically, per Section 15064(e), "Economic and social changes resulting from a project shall not be treated as significant effects on the environment. [...]" With regard to potential impacts related to traffic congestion, please see Response to Comment 26-8 above.

Response to Comment 26-10

The comment does not address the adequacy of the Draft EIR. The concerns expressed by the commenter have been forwarded to the decision-makers.

Letter 27

Shirlee Herrington

From: vaughan@quiknet.com
Sent: Monday, January 14, 2019 4:27 PM
To: Christopher Schmidt; Shirlee Herrington
Subject: Comments on Draft EIR for Whitehawk 1 & 2 project

1/14/2019

To CDRA staff,

Comments on Whitehawk I and II DEIR:

27-1 State CEQA Guidelines Section 15204 note that commenters should provide an explanation and evidence supporting their comments. Pursuant to Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

27-2 The Whitehawk I and II projects DEIR is deficient in the following areas:

- The project fails to demonstrate that adequate transition has been created to immediately adjacent and contiguous parcels. A statement of fact that transition has been created is not substantial evidence.

27-3 ○ A reconfiguration of the project with structures more centrally located with larger set-backs could achieve all of the stated goals.

27-4 ○ Policy 1.O.3 "The County shall require that all new development be designed to be compatible with the scale and character of the area."

- The character of the rural designated corridor is acre plus parcels. The DEIR has failed to define how a "building envelope" is rural. While the Open space is an asset for the development, the project as proposed could accomplish goals and numbers with a reconfiguration respecting greater setbacks from immediately adjacent and contiguous parcels.

27-5 ▪ A redesign of the planned homes could also remove the need for a self-induced coverage variance and/or the developer could achieve his

**Letter 27
 Cont'd**

- 27-5
 Cont'd
- ↑ goals of home style by increasing the building envelope to accommodate 40% coverage.
- 27-6
- The DEIR has failed to demonstrate how the project as planned is not in conflict with Policy 1.K.4 "The County shall require that new development incorporates sound soil conservation practices and minimizes land alterations. Land alterations should comply with the following guidelines:
 - Limit cut and fill
 - Limit grading to the smallest practical area of land
- 27-7
- The project MND called for cuts of 12ft and blasting of a former active silver mine site
 - Soil testing should adhere to NIOSH standards and be conducted at blasting depth as per County
- 27-8
- soil testing should be completed to determine that there are no significant levels of common mining contaminants including cyanide and lead. "Water pollution from mine waste rock and tailings may need to be managed for decades, if not centuries, after closure." *Safe Drinking Water Foundation.*
- 27-9
- The DEIR is deficient in that it does not clearly provide a 3D rendering exposing the true impacts including dividing existing neighborhoods, the massive destruction of trees and changing the topography of the project site in violation of Placer County land use elements.
 - 3D aerial renderings of ALL alternatives should be provided to clearly demonstrate the impacts of each alternative to visually determine which has the least impact.
- 27-10
- The DEIR has represented the loss of trees in inches rather than in tree numbers. This conversion of loss trees is of no meaning to the average resident and should be clearly expressed both visually and numerically.
- 27-11
- The Whitehawk projects claim required densities in order to be economically feasible to pay for upgrades to infrastructure and rely on this statement should the need arise to make road improvements. CEQA considers project recently approved or anticipated in the near future. The DEIR calls on neither and as such, this economic claim cannot be considered.
 - The DEIR has not taken into account that the less dense alternatives may not require infra-structure upgrades. This needs to be properly evaluated.
- 27-12
- The statements that the project bring a mix of homes to Granite Bay since there are more than enough acre homes available is a subjective statement and not substantiated with an analysis of the impacts to the Housing and Land Use elements of the GBCP.
 - Since the Community Plan has identified an appropriate mix of housing types to maintain the rural character of the community recognized by both the GBCP and the PCGP as a unique asset of Granite Bay, the DEIR fails to substantiate this claim.
- 27-13
- How will this increased density impact the Granite Bay Housing Ratio and impact our perception as a rural community?

**Letter 27
Cont'd**

- 27-14 ○ Both the General and Community Plan hold this Rural quality as worth preserving even if development is to occur below approved zoning. How will this high-density project not degrade the rural character of GB?
- 27-15 • South Placer Fire Department anticipates 974 residential units will be built within the Granite Bay Community and the Horse Shoe Bar Community over the next 10-15 years. The addition of higher than planned for density will accelerate and make inadequate the fire department ability to maintain emergency response rates. A National Fire Safety Standards analysis for emergency response should be included.
- 27-16 ○ The HOA directly adjacent to WHII has not granted the developer access to Quartzite for use as a secondary EVA. The fire department may state that the road is adequate, however, they do not have the authority to grant the developer legal use of the road.
- 27-17 ○ The project, should it be approved, must have as a condition of approval the requirement to secure access from the HOA prior to being granted building permits.
- 27-18 • Placer County Specific Policies for Intensity of Use: 2. Population densities within the planning area should be guided by consideration or topography, geology, vegetative cover, preservation of natural terrain and resources, and access to transportation and service facilities.
 - At this time, the Placer County Sewer Capacity study has not yet been released (Due end 2019) and it is fair argument to say that it is unknown if this project will accelerate the need to upgrade the existing sewer capacity.
- 27-19 ○ At this time, the Granite Bay Cumulative Traffic Study is still in progress. It is fair argument to state that traffic impacts may not be fully mitigated. Traffic along Douglas Blvd is already at peak and need to be considered.
- 27-20 ○ The removal of almost 1000 trees and grading of more than 50% of the parcel is in direct conflict with the Specific policy cited above.
- 27-21 ○ The volume of soil being moved and imported (identified in the MDN), along with cuts of 12ft would appear to require additional studies for the effects of changes in ground water, water shedding, water runoff, contamination of Strap Ravine, contributing to flooding of adjacent parcels (with special attention to the land parcel between White Hawk I and II), effects on the health of the few trees left in place, impacts of the large number of trees being removed. Changes of this magnitude do indeed “substantially change the topography of the parcel” and cannot be mitigated to a less than significant level.

Scott Vaughan

Concerned Homeowner

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LETTER 27: SCOTT VAUGHAN

Response to Comment 27-1

Please see Response to Comment 17-1.

Response to Comment 27-2

Please see Response to Comment 17-2.

Response to Comment 27-3

Please see Response to Comment 17-3.

Response to Comment 27-4

Please see Response to Comment 17-4.

Response to Comment 27-5

Please see Response to Comment 17-5.

Response to Comment 27-6

Please see Response to Comment 17-6.

Response to Comment 27-7

Please see Response to Comment 17-7.

Response to Comment 27-8

Please see Response to Comment 17-8.

Response to Comment 27-9

Please see Response to Comment 17-9.

Response to Comment 27-10

Please see Response to Comment 17-10.

Response to Comment 27-11

Please see Response to Comment 17-11.

Response to Comment 27-12

Please see Response to Comment 17-12.

Response to Comment 27-13

Please see Response to Comment 17-13.

Response to Comment 27-14

Please see Response to Comment 17-14.

Response to Comment 27-15

Please see Response to Comment 17-15.

Response to Comment 27-16

Please see Response to Comment 17-16.

Response to Comment 27-17

Please see Response to Comment 17-17.

Response to Comment 27-18

Please see Response to Comment 17-18.

Response to Comment 27-19

Please see Response to Comment 17-19.

Response to Comment 27-20

Please see Response to Comment 17-20.

Response to Comment 27-21

Please see Response to Comment 17-21.

Letter 28

Shirlee Herrington

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, January 14, 2019 4:57 PM
To: Shirlee Herrington
Subject: Fwd: WhiteHawks DEIR comments

Thanks for accepting Shirlee!

----- Forwarded message -----

From: **Cheryl Berkema** <cheryl.berkema@gmail.com>
Date: Mon, Jan 14, 2019 at 4:56 PM
Subject: WhiteHawks DEIR comments
To: Christopher Schmidt <CRSchmid@placer.ca.gov>
Cc: Cheryl Berkema <cheryl.berkema@gmail.com>

1/14/2019

Hello Chris,

Please accept my comments on the WhiteHawks DEIR and add these to the official record.

The Whitehawk I and II projects Draft Environmental Report deficiencies:

28-1

- The Notice of Preparation meeting presented slides that descoped what the EIR would cover. This falsely led the public to believe that they could not include comments on the population study and housing elements. The purpose of the NOP was for the public to provide their concerns to help determine scope, not to limit what comments would be accepted.

28-2

- The EIR is excessively lengthy at approximately 770 pages and appendices with traffic alone at approximately 450 pages. This far exceeds CEQA guidelines. There is legal precedent that challenges bombarding citizens with excessive technical data and fail to support the analysis sections with any substantive analysis.

28-3

- WHI and II are requesting a rezone from acre+ to building "envelopes" and a self-induced variance for coverage from 40% to 50%. California and Placer County do not allow this granting of special privileges within a zoning district. This "variance" could be avoided by making the envelopes larger.

28-4

- Traffic study, population study, and sewer study are required to analyze the impacts of these proposed projects.

28-5

- Appendices for soil sample testing state grading plans were "not available". Conclusions about soil testing should not be made without sufficient information about health risks posed with regard to dynamiting, grading and soil contaminants. Recent legal precedent holds government to a higher standard regarding environmental impacts that can affect health. The proposed project site was a previous mining site and therefore rigor should be applied in analyzing the soil testing.

28-6

- The DEIR has provided less relevant data than the MND for the projects. The assumption is significant impacts exposed in the MND are not being surfaced in the DEIR.

28-7

- The Beaver Creek MND (WhiteHawk II) had more impacts identified with 7 units than the 55 unit WHII. Suggests a higher level of transparency with the Beaver Creek MND.

28-8

- The WhiteHawk II project has identified an EVA that fire has said is acceptable, however the fire department cannot grant approval of the easement for use. Strap Ravine HOA has not granted approval and has presented such at the December 13, 2018 hearing.

**Letter 28
Cont'd**

- 28-9 • A cumulative greenhouse gas evaluation should be compared between the as planned and requested densities.
- 28-10 • Drainage reports among the Beaver Creek, Whitehawks MND, and Whitehawks DEIR contain conflicting data (onsite recommended, drainage onto Quartzite, drainage not allowed onsite???).
- 28-11 • The projects will remove hundreds of Oak trees, some protected, as well as grade more than 50% of the parcels. This is in conflict with the Placer County General Plan and Final EIR which both state that GB should be developed under zoning, encourage the preservation of native trees, avoid excessive grading of parcels or change the topography of the land to help maintain PC as a rural county. The Beaver Creek MND avoided environmentally sensitive areas. Greatly reducing the number of lots to avoid those sensitive areas could be accomplished.
- 28-12 • The projects are located in a designated "RURAL" area; as such, building envelopes are in conflict with our community plan. The EIR is claiming that the projects provide a housing mix since there are adequate acre + properties. The GBCP has ALREADY established an appropriate mix of housing. These projects change that mix. Any variances granted or rezones are a rewrite of our community plan.
- 28-13 • The No Project (No Build) Alternative; Buildout Pursuant to Existing Zoning Alternative, and Reduced Density Alternative are not sufficient. The analysis would lead one to believe that the 55 and 24 unit developments are superior less environmentally invasive solutions with great community merit. The analysis is lacking.
- 28-14 • Parking is lacking for the project. Reducing the number of parcels could bring parking numbers into satisfactory range.
- 28-15 • Gates do not meet Granite Bay Community Plan design guidelines.
- 28-16 • The County ignored the Board of Supervisor certified Beaver Creek MND alternative which already had analysis of the site, provided reasonable mitigation and avoided sensitive areas.
- 28-17 • The project fails to demonstrate that adequate transition has been created to immediately adjacent and contiguous parcels. A statement of fact that transition has been created is not substantial evidence. A reconfiguration of the project with structures more centrally located with larger set-backs could achieve all of the stated goals. A redesign of the planned homes could also remove the need for a self-induced coverage variance and/or the developer could achieve his goals of home style by increasing the building envelope to accommodate 40% coverage.
- 28-18 • The DEIR is deficient in that it does not clearly provide a 3D rendering exposing the true impacts including dividing existing neighborhoods, the massive destruction of trees and changing the topography of the project site in violation of Placer County land use elements.
- 28-19 • The DEIR has represented the loss of trees in inches rather than in tree numbers. This conversion of loss trees is of no meaning to the average resident and should be clearly expressed both visually and numerically.
- 28-20 • The Whitehawk projects claim required densities in order to be economically feasible to pay for upgrades to infrastructure. Beaver Creek with 7 units did not make this claim. Bella Terra built as zoned providing the infrastructure. The statements that the project bring a mix of homes to Granite Bay since there are more than enough acre homes available is a subjective statement and not substantiated with an analysis of the impacts to the Housing and Land Use elements of the GBCP.

Thank you for considering my comments on the WhiteHawks Draft Environmental Report

Cheryl Berkema

LETTER 28: CHERYL BERKEMA, LETTER 5 OF 5

Response to Comment 28-1

The scoping meeting PowerPoint slide(s) referred to by the commenter reflect the language on the last page of the NOP, stating that the EIR will include an Effects Not Found to be Significant chapter, which is anticipated to include but not be limited to:

- Agriculture and Forestry Resources;
- Questions related to septic system use (from the Geology and Soils section of Appendix G); and
- Population and Housing

It is clear that this NOP language did not lead the public to believe that they could not include comments on the population study and housing elements given that many public comment letters submitted on the NOP included such comments. Refer to Appendix B of the Draft EIR, which includes all of the public comment letters submitted in response to the NOP.

It is not uncommon for the scope of an EIR to be expanded in response to meaningful public comments made in response to a NOP. This is because the scope of an EIR is not fixed when a NOP is released; rather, the scope reflects the lead agency's preliminary determination as to which issues should be studied in the EIR. The lead agency solicits public input to ascertain whether its preliminary determination is sufficient, or whether additional issues may need to be studied based on meaningful public input. Here, in the case of the WH projects, the County decided to include a more robust population analysis in the EIR in response to the NOP comments.

Response to Comment 28-2

See Response to Comment 5-1. The County is not aware of any "legal precedent" that the commenter appears to be indirectly referring to with respect to excessive technical data. As stated in CEQA Guidelines Section 15147, Technical Detail:

The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

Thus, the CEQA Guidelines clearly allow for inclusion of highly technical and specialized analysis in an Appendix to an EIR, which may be a separate volume(s) from the basic EIR document. Such an approach was taken with the Draft EIR in an effort to keep the highly technical and specialized analysis out of the body of the EIR, but still make it available in a technical appendix for public disclosure purposes.

Response to Comment 28-3

Please see Response to Comment 9-2.

Response to Comment 28-4

Please see Responses to Comments 4-2 and 4-3. With respect to the requested population study, the comment lacks specificity with respect to the desired scope of such a study. Pages 11-22 through 11-25, and pages 17-36 through 17-38, of the Draft EIR include a detailed evaluation of Granite Bay's current and projected population, using best available data, and the effects of the WH projects' incremental population increase.

Response to Comment 28-5

As illustrated in Figures 9-1, 9-2, and 9-3 of the Hazards and Hazardous Materials chapter of the Draft EIR, extensive soil testing has occurred on both the WHI and WHII sites. The soil sampling efforts and results are described in detail on pages 9-3 through 9-8 for WHI, and pages 9-9 and 9-10 for WHII. In addition, grading exhibits, illustrating the proposed areas of cut and fill for both the WHI and WHII project sites, were shared with Wallace Kuhl & Associates, who subsequently determined, based on a review of the results of previous sampling efforts, that no additional samples were warranted.⁹

Response to Comment 28-6

The commenter provides no specific evidence of where the Draft EIR provides "...less relevant data than [sic] the MND for the projects." The assertion that this implies that impacts exposed in the Mitigated Negative Declarations (MNDs) prepared for the projects are not being surfaced in the Draft EIR is speculation and lacks any supporting substantiation.

Response to Comment 28-7

The commenter provides no specific evidence to substantiate the claim. Furthermore, the Beaver Creek MND has no bearing on the Draft EIR and its conclusions. The County prepared a new environmental analysis, independent from previous MNDs, including the Beaver Creek MND, which relied on new technical studies and the best available information.

Response to Comment 28-8

Please see Response to Comment 3-3.

⁹ Email from Dennis Nakamoto PG, CHG, CEG, Senior Hydrogeologist, Wallace-Kuhl & Associates, May 11, 2018. #

Response to Comment 28-9

Legal requirement to prepare a greenhouse gas evaluation of the planned and proposed densities for the project sites do not exist. According to CEQA Guidelines Section 15064.4(b):

A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions...

As seen in part (b)(1), consideration should be given to the extent to which the project may increase or reduce greenhouse gas emissions as compared to the *existing environmental setting* (emphasis added). Nothing requires a comparison to the planned density for a project site. The greenhouse gas emissions analysis conducted for the WHI and WHII projects, contained in Chapter 17, Cumulative Impacts and Other Sections, of the Draft EIR (pp. 17-15 to -31), is consistent with CEQA Guidelines Section 15064.4.

Response to Comment 28-10

The drainage and water quality reports prepared for the WHI and WHII projects are contained in appendices J and K of the Draft EIR. These reports were prepared for the proposed projects, as described in Chapter 3 of the Draft EIR, and were independently reviewed and verified for accuracy by Placer County staff. The drainage systems for the proposed projects would not discharge any runoff onto Quartzite Circle; in fact, drainage from Quartzite Circle flows west through the WHII site before reaching Strap Ravine. All storm water drainage from the developed project sites would be collected and treated on-site via bio-retention basins, after which it will be routed to Strap Ravine.

As discussed on page 10-31 of the Draft EIR, this would be consistent with the County's approach to peak flow management in the watershed. The project site is located in an area identified in the Dry Creek Watershed Flood Control Plan where local stormwater detention is not recommended. Mitigation measures for development in this area include flood control development fees to fund regional detention basins to reduce flooding on major streams in the Dry Creek watershed. The projects will contribute their fair share toward the regional detention facilities through compliance with Mitigation Measure 10-3(b). Furthermore, as noted in Response to Comment 28-7, the County prepared a new environmental analysis for the proposed projects, independent of any previous MNDs.

Response to Comment 28-11

Please see Response to Comment 17-20.

Response to Comment 28-12

Please see Response to Comment 17-12.

Response to Comment 28-13

The comment is unclear as the Draft EIR concludes that both the Buildout Pursuant to Existing Zoning Alternative and the Reduced Density Alternative would have fewer environmental impacts than the proposed projects (see Table 18-9 on page 18-56 of the Draft EIR).

Response to Comment 28-14

The comment does not address the adequacy of the Draft EIR. Parking is not a consideration under CEQA. Notwithstanding, the following response is offered:

A Variance to parking requirements is not required. The Planned Residential Development regulations do allow for flexibility in parking standards. Special parking provisions can be established by the Conditions of Approval of a project's Conditional Use Permit. The Zoning Ordinance requires four off-street parking spaces on roads less than thirty-two feet wide, exclusive of garage parking. Due to the proposed width of the proposed roadways, no on-street parking will be permitted.

For WHI, a total of 96 off-street parking spaces are required by the Zoning Ordinance's parking standards. A total of 83 off-street parking spaces are proposed, exclusive of garage parking. Twenty-four spaces are visitor parking spaces in four parking bays dispersed throughout the site. Eleven of the units will have driveway parking for three cars for a total of 33 spaces. Thirteen of the units will have two spaces in each residence's driveway for 26 spaces. In total, there will be 142 garage, driveway, and parking bay spaces within the development.

The Zoning Ordinance parking standards require WHII to provide 220 off-street parking spaces. A total of 194 off-street parking spaces are proposed, of which, 55 spaces are visitor parking spaces in six parking bays dispersed throughout the site. Twenty-nine of the units will have driveway parking for three cars for a total of 87 spaces. Twenty-six of the units will have two spaces in each residence's driveway for 52 spaces. In total, there will be 333 garage, driveway, and parking bay spaces within the development.

Response to Comment 28-15

The comment does not address the adequacy of the Draft EIR. Notwithstanding, the following response is offered:

The projects are proposing private gated access onto Douglas Boulevard. This is consistent with GBCP Circulation Policy 28, wherein gates are allowed for subdivisions "directly accessed off a Major Arterial roadway", such as Douglas Boulevard. As required in the GBCP, unrestricted pedestrian access would be maintained from dawn to dusk into the neighborhood through a pedestrian gate.

The neighborhood entries on Douglas Boulevard would be landscaped with native vegetation, indigenous features, and marked with enhanced hardscape features. The entries would feature a project-identification monument, a landscaped traffic circle, and a vehicle gate south of the traffic circle. The GBCP contains specific residential gating design guidelines including:

- Wrought iron, natural stone and wood shall be the prime materials.
- Existing vegetation and wooded areas should be incorporated into entrance design.
- The gated entrance design allows for paved adequate turn-around and keypad setback per the Engineering and Surveying Department's recommended design.
- Structural entrance features must satisfy zoning ordinance setback requirements DPW sight-clearance standards, and fire district access requirements. Landscaping should be consistent with the ultimate configuration of the intersection and should include low-lying shrubs and groundcover to maintain adequate site distance.
- Non-native and "formal" type landscape design and vegetation are discouraged.
- Entrance feature lighting should be restricted to identification purposes, minimally illuminative, and with only directed and shielded lighting on the identifying portion of the entrance feature.

The preliminary designs for the gated entryways for WHI and WHII meet these requirements. The final design of the entry features would be reviewed during the County's Improvement Plan Check and Design Review process.

Response to Comment 28-16

The Draft EIR meets CEQA's alternatives requirement by evaluating a reasonable range of alternatives (15126.6(f)). According to 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The alternatives evaluated in the Draft EIR present a range of alternatives that meet most of the basic objectives of the proposed projects and avoid one or more significant effects of the proposed project (15126.6(c)). In doing so, they meet CEQA requirements for an alternatives analysis and foster informed decision making.

Response to Comment 28-17

Please see Response to Comment 9-10.

Response to Comment 28-18

Please see Response to Comment 17-9.

Response to Comment 28-19

Please see Response to Comment 17-10.

Response to Comment 28-20

Please see Response to Comment 17-11.

**Whitehawk I and II Draft EIR
Public Comment Meeting Summary**

Letter 29

Date: December 13, 2018
Time: 10:00 AM
Location: Placer County Community Development Resource Center
Planning Commission Hearing Room
3091 County Center Drive,
Auburn, CA 95603

I. Verbal Comments (arranged in order of “appearance” of commenter):

Jeff Caravelli

29-1

- The commenter states that he is making statements on behalf of the Strap Ravine Estates Property Owners Association (SREPOA).
- Several member parcels will share a common property line with the proposed development.
- The commenter refers to the proposed emergency vehicle access (EVA) road for Whitehawk II on pages 3-19 and -21 of the Draft EIR.
- The EVA would meander through a member parcel and terminate on Quartzite Circle, which is a privately maintained, public road supported by annual assessments levied on association members.
- The commenter states that the SREPOA has concerns related to the maintenance impacts that could occur on Quartzite Circle due to EVA use. SREPOA is financially responsible for Quartzite Circle maintenance, and is also concerned that the EVA may become an “attractive nuisance” to increase pedestrian and other non-motorized through traffic, or unauthorized use of a neighboring vacant member parcel directly to the south of the member parcel in question.

29-2

- The commenter notes that, “most importantly,” the DEIR incorrectly states that the proposed EVA route would not conflict with any land use restrictions. The underlying easement and proposed EVA are inconsistent with CC&Rs that bind the member parcel and other association members. Specifically, there are restrictions that say, “And no portion of said property shall be used for any purpose other than for single-family dwelling purposes,” and also, “No form of business commercial, manufacturing, or storage enterprise activity shall be conducted or maintained in this subdivision.” These are enforceable land use restrictions. An access road through a member’s parcel to a third-party property is not consistent with the concept of single-family dwelling purposes; and an easement sold for monetary gain is a prohibited commercial activity. The association has not been approached for permission, and, therefore, believes the EVA is contrary to CC&Rs.

29-3

- The commenter states that the SREPOA will be researching enforcement options and will submit written comments by the deadline.

**Letter 29
 Cont'd**

Bill Peterson

- 29-4 • The commenter states that the CC&Rs deem the road to be a common area and that the subdivision could be liable if someone were to get hurt on the EVA.
- 29-5 • The commenter states that traffic is a huge problem in the area and the project will greatly increase traffic.
- 29-5 • The commenter states that traffic on Douglas Boulevard is bad and asserts that other EVAs have become public roads to avoid traffic congestion and provide a way out of the subdivision.
- 29-6 • Density should be lowered.

Sandy Harris

- 29-7 • The commenter has concerns with calling the project a “mixed residential opportunity area” as identified in the Community Plan, and states this characterization of the project is a total misconception.
- 29-8 • The commenter notes that the Granite Bay Community Plan (GBCP) states that commercial sites along Douglas Boulevard and Auburn-Folsom Road corridors may provide an opportunity to create such a center if redeveloped with a range of housing, commercial, and employment uses. These are aging commercial sites.
- 29-8 • The commenter states, when the GBCP was being prepared, they talked about existing commercial sites maybe someday, if redeveloped, could include lofts or something similar. The project is not a mixed use. It is totally a housing development.
- 29-9 • The commenter states that she does not know where the connecting road is located as she can see it on Whitehawk II but not on Whitehawk I.
- 29-10 • The commenter has concerns with the increased density to 50 percent coverage and states that reducing the size of proposed residences would solve the problem.
- 29-11 • The commenter states that the Planning Commission has recently supported tiny homes on wheels that could be crammed in her neighborhood without gates or CC&Rs to prevent this type of building.
- 29-11 • The commenter is concerned that the project would not provide affordable housing and states that Placer County has ordinances which require new development projects to have 10 percent affordable housing; but they could meet this obligation by paying in-lieu fees.
- 29-11 • The commenter asks why this development does not have to share the burden of providing affordable housing, yet the county is mandating it in her neighborhood.
- 29-11 • The commenter suggests that bottom lots that back up to 5-acre, 2-acre, and 3-acre lots include smaller houses that could provide affordable housing for maybe seniors.

Chris Anderson

- 29-12 • The commenter notes that he is well-aware of some of the drainage issues.
- 29-12 • The commenter described his credentials as a veteran of the California Department of Housing, as Chief Building Official for residential construction in the State of California. The commenter routinely dealt with State and local agencies in disaster recovery.
- 29-13 • The commenter states that the Commission should consider comments made by the CAL FIRE Director, which recommend that government officials should consider banning home construction in vulnerable areas of California.

**Letter 29
Cont'd**

- 29-13
cont'd
- The commenter states that the project sites are in a wildland-urban interface area and are vulnerable to wildfire.
 - The commenter displayed a Google map of the area and discussed concerns that a wildland fire in the area with strong winds would destroy his house and other areas. Embers advance one to two miles ahead of the flames, creating a hot environment with spot fires all over. This could lead to a wall of flame destroying anything in its path, as seen in Paradise, Santa Rosa, Lake County, Calaveras County, San Diego, etc.
- 29-14
- The commenter states that the Commission should consider other alternatives for housing.

John Millburn

- 29-15
- The commenter states the EIR does not make mention of the undeveloped land between Whitehawk I and Whitehawk II, and should consider the future development of that area as an infill site at the same density as the Whitehawk I and II projects.
- 29-16
- The commenter states that Douglas Boulevard widening traffic mitigation for the combined Whitehawk I and II projects should be applied to whichever phase of the project is built first.
- 29-17
- The commenter states that setbacks should be increased to give a sense of a more rural and undeveloped nature. Proposed setbacks for the Whitehawk projects are 20 feet while current Quartzite properties have 50-foot rear-yard setbacks and 30-foot side-yard setbacks. The commenter would be more comfortable if setbacks, particularly on the southern portion of Whitehawk II, are increased.
- 29-18
- The commenter notes their familiarity with a prior development proposal for the sites involving construction of condominiums, whereas the current proposal includes single-family homes on individual lots.
- 29-19
- The commenter states that the streets are too narrow to accommodate street parking. Twenty percent of Whitehawk II does not have any off-site parking. For lots 45-55 (11 lots), there is no parking. There is no place for visitors to park.

LETTER 29: PUBLIC MEETING COMMENTS

Response to Comment 29-1

Please see Responses to Comments 3-1 and 3-2.

Response to Comment 29-2

Please see Response to Comment 3-3.

Response to Comment 29-3

The comment notes the intent of the commenter to submit written comments on the Draft EIR. The letter that the County subsequently received from the commenter is included herein as Letter 3.

Response to Comment 29-4

The comment does not address the adequacy of the Draft EIR, and has been forwarded to the decision-makers.

Response to Comment 29-5

Please see Response to Comment 26-8 regarding traffic.

The WHII EVA would be used for emergency purposes only, will be conditioned as such in the project's conditions of approval, and would not become a public road for general traffic circulation purposes.

Response to Comment 29-6

The comment does not address the adequacy of the Draft EIR. The comment has been forwarded to the decision-makers for their consideration. Please note that the Buildout Pursuant to Existing Zoning Alternative and Reduced Density Alternative presented in the Draft EIR both represent buildout of the project sites at a reduced density compared to the proposed projects.

Response to Comment 29-7

As noted on page 11-8 of the Draft EIR, in the GBCP, both the WHI and WHII project sites were identified as a potential "Mixed-Residential Opportunity Area." Notably, the GBCP identifies two subcategories of Opportunity Areas – one permitting mixed-uses, including commercial space, and one permitting a mix of residential housing types (GBCP, Land Use Element, pg. 38). The latter is referred to in the GBCP as a "Mixed-Residential Opportunity Area". The GBCP states the following regarding this type of Opportunity Area (pg. 38):

The one suggested Mixed-Residential location consists of vacant parcels on the south side of Douglas immediately east of the Greyhawk subdivision and at the corner of Berg Road and Douglas. Other parcels and locations could also be considered for such designation however.

Housing on a Mixed-Residential Opportunity site may come in a variety of forms. Appropriate residential uses include apartments, lofts, townhomes, live/work units, condominiums, and clustered units.

It is instructive that the description refers to vacant parcels on the south side of Douglas Boulevard, immediately east of the Greyhawk subdivision. Such a description includes the WH project sites.

Response to Comment 29-8

Please see Response to Comment 29-7 above.

Response to Comment 29-9

The comment is unclear, but appears to be referring to the proposed on-site roadway stubs at the eastern property line of WHI and the western property line of WHII. These are shown on the site plan exhibits included in Chapter 3, Project Description, of the Draft EIR and were discussed in Response to Comment 26-6 above.

Response to Comment 29-10

For concerns regarding the requested Variances, please see Response to Comment 9-2 above.

Response to Comment 29-11

The commenter's concerns regarding affordable housing have been forwarded to the decision-makers. The comment does not address the adequacy of the Draft EIR. As noted in Table 11-5 of the Draft EIR,

Pursuant to Placer County Housing Element Policy B-14, the WHI and WHII projects are required to include an affordable housing component. Placer County Housing Element Policy B-14 requires the County to consider projects that increase residential density to include 10 percent of the units to be affordable, pay an in-lieu fee, or provide a comparable affordable housing measure(s) found acceptable to the County. Placer County does not have an adopted affordable housing in-lieu fee at this time.

The applicant is required to provide an affordable housing measure (i.e., construction deed-restricted affordable housing units) and submit an affordable housing plan to the County for review and approval that details how this measure fulfills the projects' Affordable Housing obligation. Considering that the proposed projects would include an affordable housing component executed by an affordable

housing plan approved by the County, the proposed projects would be in compliance with the County's affordable housing requirements, including County Policy B-14. This will be a Condition of Approval of the project(s).

Response to Comment 29-12

Please Response to Comment 13-15.

Response to Comment 29-13

As noted on page 9-11 of the Draft EIR, according to the California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP), the WHI and WHII sites are located within an unincorporated Local Responsibility Area (LRA). An LRA is an area that is not under federal or State responsibility and in which the local agencies have sole responsibility for fire suppression activities. Furthermore, the WHI and WHII sites are not located within a Very High Fire Hazard Severity Zone (VHFHSZ) – see Draft EIR, pg. 9-11. Thus, while the potential for wildfire could exist, the project sites are not in an area which has been classified as being subject to a substantial hazard due to wildland fires. It should also be noted that, according to the South Placer Fire District, the WH projects are not in a wildland urban interface area and would not be subject to Chapter 7A building requirements in the California Building Code.¹⁰

Furthermore, development of the sites for residential uses would reduce the risk of wildland fire because removal of existing vegetation for site improvements, such as roadways, driveways and irrigated landscaping, would reduce readily combustible vegetation. The vegetation on the WH project sites that established after the mining consists primarily of small, multi-stemmed interior live oaks, cottonwoods and a dense understory of native and introduced shrubs. The resulting woodlands have a much more dense understory than normal. This dense understory could serve as ladder fuels during a wildfire – increasing the likelihood that the area could sustain a destructive wildfire. In addition, many of the oak trees in the project have very poor structure (poor branch attachment, co-dominant leaders, cavities, etc.).

An Operations and Management Plan will be prepared by the WHI and WHII HOAs for both sites with open space management strategies including fire/fuel modification, maintenance (e.g. mowing), permitted and prohibited uses, preserve management techniques, and trail and preserve maintenance. The Operations and Management Plan for the open space areas on the sites would require non-intrusive fuel load reduction efforts to reduce the risk of wildfires. As such, the WHI and WHII projects would result in reduced wildfire hazards relative to existing conditions.

In addition, as noted on page 9-25 of the Draft EIR, the projects would be designed in accordance with the latest requirements of the California Fire Code and Placer County. Improvement Plans for WHI and WHII would be routed to the South Placer Fire District, which provides fire prevention services to Placer County, for review and approval.

¹⁰ Mike Ritter, Division Chief, South Placer Fire District. Personal communication [email] with Nick Pappani, Vice President, Raney Planning and Management. January 25, 2019.

Response to Comment 29-14

The commenter's suggestion has been forwarded to the decision-makers for their consideration.

Response to Comment 29-15

Please see Response to Comment 26-6 above.

Response to Comment 29-16

Please see Response to Comment 18-8.

Response to Comment 29-17

The comment does not address the adequacy of the Draft EIR. The commenter's concerns have been forwarded to the decision-makers for their consideration.

Response to Comment 29-18

The comment does not address the adequacy of the Draft EIR.

Response to Comment 29-19

Please see Response to Comment 28-14.