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REVISIONS TO THE DRAFT EIR TEXT

3.1 INTRODUCTION

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

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

3.2 DESCRIPTION OF CHANGES

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

5 Air Quality

On December 24, 2018, subsequent to the publication of the Draft EIR, the California Supreme Court issued a ruling in the case of *Sierra Club v. County of Fresno (Friant Ranch, L.P.)*. The California Supreme Court's ruling in the case clarified the need for EIRs to address potential connections between long-term air quality impacts from criteria pollutants related to implementation of a proposed project and specific health consequences.

It should be noted that Table 5-1 of the Draft EIR presents a summary of health effects, as well as major sources of each criteria pollutant, and further information related to each criteria pollutant of concern is provided on pages 5-4 through 5-8 of the Draft EIR. Nevertheless, given the California Supreme Court's recent decision, County staff has decided to include the following revisions to page 5-38 of the Draft EIR, for clarification purposes.

Naturally Occurring Asbestos

According to the *Special Report 190: Relative Likelihood for the Presence of Naturally Occurring Asbestos in Placer County, California*, prepared by the Department of Conservation, both project sites are located within an area categorized as least likely to contain NOA, because faults and serpentinite outcroppings are not known to be in the project area.¹⁷ Consequently, NOA is not anticipated to be present on the project sites.

¹ California Supreme Court. *Sierra Club v. County of Fresno (Friant Ranch, L.P.)*. December 24, 2018.

Criteria Pollutants

As noted in Impact 5-1 of this chapter, construction-related activities included in the proposed project would have the potential to result in a significant and unavoidable impact related to the emission of criteria air pollutants. In particular, construction related activities associated with implementation of WHII or the combined WHI and WHII projects would result in NO_x emissions in excess of the PCAPCD's thresholds of significance. The largest emission generating activity during project construction would be the use of haul trucks to transport fill material to the project site.

The PCAPCD's thresholds of significance were established with consideration given to the health-based air quality standards established by the NAAQS and CAAQS, and are designed to aid the district in achieving attainment of the NAAQS and CAAQS.² The PCAPCD's thresholds of significance are intended to aid achievement of the NAAQS and CAAQS for which the SVAB is in nonattainment, but the thresholds of significance do not represent a level above which individual project-level emissions would directly result in public health impacts. Rather, the thresholds of significance represent emissions levels that would ensure that project-specific emissions would not inhibit attainment of regional NAAQS and CAAQS. On a regional level, the long-term operational emissions of the proposed project would have a greater potential to affect the attainment of the NAAQS and the CAAQS, compared to short-term construction emissions, given that operational emissions would occur on an on-going basis throughout the life of the project. As discussed under Impact 5-2 of this chapter, the operational emissions of the WHI, WHII, or combined projects would be below the PCAPCD's thresholds of significance. Consequently, the proposed projects would not inhibit attainment of regional NAAQS and CAAQS.

As noted above, construction activity would result in emissions in excess of the PCAPCD's standards; however, several factors would reduce the likelihood that short-term construction-related emissions would result in adverse health impacts. Emissions related to construction activity would occur over a relatively limited amount of time. For instance, site grading, which is the most emissions-intensive phase of project construction, is only anticipated to occur over 30 days. Furthermore, the largest source of emissions during the site grading phase would be the transport of fill material. Emissions from fill hauling would be distributed throughout the entire route taken by the fill hauling vehicles, which would result in the dispersal of emissions from the haul trucks. Criteria pollutant emissions from haul trucks would be dispersed through regional wind patterns throughout the entire SVAB. The SVAB includes all of Sacramento, Yolo, Yuba, Sutter, Colusa, Glenn, Butte, Tehama, and Shasta counties and portions of Solano and Placer Counties. Thus, emissions resulting from project-related construction would be dispersed throughout a large area, and emissions related to the proposed project would represent a small fraction of emissions resulting from activities throughout the SVAB. Dispersal of haul truck emissions would reduce the likelihood that any single receptor would be subject to excess concentrations of criteria pollutants due to project construction sufficient to result in health impacts. In summary, construction-related emissions would occur over a relatively short period of time and would be dispersed throughout the project region as haul trucks move to and from the project site.

² Placer County Air Pollution Control District. *CEQA Air Quality Handbook* [pg. 20]. November 21, 2017.

Standard methodologies for assessing health impacts related to pollutant exposure involve conducting dispersion modeling that considers the location and type of emission sources, the location of existing sensitive receptors, and environmental factors such as climate, wind direction, and topography. There are various sources within the project region that may be used to supply fill material to the project site; however, should the proposed projects be implemented, some of the currently available locations for fill material may have ceased operations, and other sites not yet in operation may become available sources of fill. Thus, the source of fill material and the path taken to deliver such material to the project site cannot be known at this time. Because emissions from construction activity would occur over a large area, and the exact route of haul truck trips to and from the site is not currently known, dispersion modeling for project-related emissions would be highly speculative. Additionally, dispersion models with sufficient computational power to estimate pollutant dispersion and resultant health impacts throughout the entire SVAB are not currently available.

Considering the above, implementation of the proposed projects would not result in long-term emissions of criteria pollutants that would exceed PCAPCD standards, and, thus, would not inhibit attainment of regional NAAQS and CAAQS. In addition, due to the factors discussed above, although construction activity would result in short-term emission of NO_x in excess of the PCACPD's standards, such emissions would be unlikely to result in health impacts because construction emissions would occur over a short-duration and would be dispersed on- and off-site throughout the SVAB.

Conclusion

Based on the above analysis, the proposed residential land uses would not be anticipated to result in the production of substantial concentrations of DPM or localized CO. In addition, the likelihood of NOA being present within either project site is low, and the proposed project would not be anticipated to result in substantial emissions of criteria pollutants resulting in health impacts to sensitive receptors. Therefore, implementation of WHI only, WHII only, or WHI and WHII combined would not result in the exposure of sensitive receptors to substantial pollutant concentrations, and a *less-than-significant* impact would result.

Mitigation Measure(s)

None required.

The above changes have been made in response to recent decisions by the California Supreme Court. As demonstrated within the above, the changes do not alter the analysis or conclusions within the Draft EIR

11 Land Use and Planning/Population and Housing

Page 11-9 of the Draft EIR is hereby revised 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 21,818~~579~~⁸.

In addition, the corresponding footnote 8 is revised as follows:

Based on ~~7,910~~824 units * 2.747 persons per household + 86 new assisted living beds.

The population references on pages 11-22 and 11-24 of the Draft EIR are similarly revised.

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

Page 11-20 of the Draft EIR is hereby revised as follows:

[...] 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 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 ~~east~~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.

In addition, page 11-21 is revised as follows:

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, ~~within~~ 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 forgoing revisions are for clarification purposes only and do not affect the conclusions of the Draft EIR.

Other

All references in the EIR to the Placer County Department of Public Works and Facilities (DPWF) are hereby revised to instead reference the Department of Public Works (DPW). These changes have been made simply to reflect recent name changes to County departments.