

ERRATUM
TO
WHITEHAWK I & II PROJECTS
FINAL ENVIRONMENTAL IMPACT REPORT
(FEBRUARY 28, 2019)

INTRODUCTION

This erratum to the Final Environmental Impact Report (EIR) for the Whitehawk I and II projects has been prepared to provide responses to one (1) additional public comment letter that was inadvertently omitted in the Final EIR released to the public on February 25, 2019. The omission is a result of a clerical error, and as will be shown below, the public comments do not raise new issues, nor do they require changes to the analysis or conclusions contained within the Draft EIR, which remains adequate.

CHANGES TO THE FINAL ENVIRONMENTAL IMPACT REPORT

Page 2-114 of the Final EIR is hereby revised to include the comment letter on the following page (Letter 30) and associated responses.

January 11, 2019

MEMORANDUM

TO: Placer County Planning Commission

FROM: Jeffrey M Caravelli
8953 Quartzite Circle
Granite Bay, CA 95746

RE: Whitehawk EIR comments

Three comments related to the November 2018 draft Environmental Impact Report (“EIR”):

30-1

First, I am a member of the Strap Ravine Estates Property Owners Association (“Association”) and reiterate and support its position regarding the proposed Emergency Vehicle Access (“EVA”) route from Whitehawk II onto Quartzite Circle. The proposed EVA has not been approved by the Association and is contrary to the binding CC&Rs. The County has been informed of this numerous times and it is inappropriate and disappointing that it is included in the draft EIR in its present form under these conditions.

Second, even if the EVA were approved by the Association, it would be useless for its intended purpose to provide adequate emergency services to new Whitehawk II residents. At 13-13, the draft EIR states:

30-2

The South Placer FD has provided a temporary will-serve letter for the WHII project indicating that the District would provide services to the project site.⁹ Fire protection services for the WHII site would be provided by South Placer FD through Station 16, located approximately 1.3 miles north of the site by way of Berg Street. Given the proximity of the site to Station 16, the response time to the WHII site is anticipated to be within the South Placer FD’s 5.5-minute response zone and construction of new fire protection facilities would not be required in order to provide adequate services to the site. (underlining added)

In other words, planned emergency access to Whitehawk II is from the north across Douglas and through the main entrance, not from the south by way of Eureka Road/Quartzite Circle. In the event a resident needed to be taken to the hospital, both Kaiser Roseville and Sutter General are to the north of the project site – Kaiser to the northwest along Douglas and Sutter to the northeast across Douglas on Eureka towards I-80. Emergency vehicles would likely never use the EVA, so why build it?

30-3

Third, the Alternatives Analysis in chapter 18 of the draft EIR is flawed. At 18-21:

The No Project (No Build) Alternative discussed above would be considered a “no build” alternative, wherein the existing environmental setting is maintained. However, failure to proceed with the proposed projects would not necessarily result in the preservation of the

existing environmental conditions, but could rather result in the future buildout of sites pursuant to existing County planning documents. As such, the Existing Zoning Alternative would be considered another type of “no project” alternative.

And at 18-53:

While the Buildout Pursuant to Existing Zoning Alternative would predominantly result in fewer impacts than the Reduced Density Alternative for WHI only, WHII only, and the combined projects, the Buildout Pursuant to Existing Zoning Alternative technically qualifies as a ‘no project’ alternative and cannot be considered the environmentally superior alternative. Therefore, the Reduced Density Alternative for both projects would be considered the environmentally superior alternative to the proposed project.

This is nonsense. The Existing Zoning Alternative would be a master-planned development consisting of 10 homes with designated open space areas protecting Strap Ravine and maintaining the 300-foot setback from Douglas Boulevard, in full compliance with the Granite Bay Community Plan and existing zoning. This is hardly “no project.” The Applicant here is clearly attempting to portray the Existing Zoning Alternative as “no project” to avoid properly declaring it the “Environmentally Superior Alternative” as required by the California Environmental Quality Act. There is a difference between approving 10 homes and denying the Applicant entirely, which would result in the status quo of zero homes being built. This is only “no project” if you are a developer requesting re-zoning and variances to maximize your profits to the detriment of existing local residents.

I support the approval of the Existing Zoning Alternative but without an EVA from Whitehawk II to Quartzite Circle. See draft EIR Figure 18-2 at page 18-23.

Respectfully,

JEFFREY M CARAVELLI
jeff.caravelli@gmail.com

END

**30-3
cont'd**

30-4

Response to Comment 30-1

The commenter reiterates support for the Strap Ravine Estates Property Owners Association’s (“Association”) position regarding the proposed emergency vehicle access (EVA) for Whitehawk II. The Association provided a comment letter on the Draft EIR, which has been included as Letter 3 of the Final EIR. As generally noted by the commenter, the Association finds that the proposed Whitehawk II EVA is contrary to the binding Covenants, Conditions, and Restrictions (CC&Rs) for Strap Ravine Estates. While the County appreciates the concerns expressed by the Association and this commenter regarding the proposed EVA and its consistency with the CC&Rs, this is not a CEQA issue, but rather an issue between the Association and the underlying property owner granting the easement for the EVA.

Response to Comment 30-2

The EVA proposed for WHII is required by the South Placer Fire District. Consistent with South Placer Fire District’s subdivision standards, an EVA is not only intended for emergency vehicles to access a subdivision, but also to allow its residents to evacuate during an emergency. The proposed Whitehawk II EVA is intended to: 1) serve as a secondary EVA for responding emergency vehicles, which would be used if the primary access at Douglas Boulevard were to be obstructed; and 2) provide a safe and expedient means for residents to evacuate either the Strap Ravine Estates or Whitehawk neighborhoods in the event of an emergency.

Response to Comment 30-3

CEQA Guidelines Section 15126.6(e)(3)(B) recognizes that there are two forms of a “no project” alternative:

(B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

The first form is no project/no build, whereby the project site is maintained in its current state. The second form is no project/buildout pursuant to existing zoning, whereby the project’s non-approval could practically result in development of the site consistent with current zoning. CEQA Guidelines Section 15126.6(e)(2), states that “If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the

other alternatives.” It is for this reason that the Whitehawk I and II Draft EIR does not select the Buildout Pursuant to Existing Zoning Alternative as the environmentally superior alternative. Notwithstanding this, the Draft EIR acknowledges on page 18-53 that the Buildout Pursuant to Existing Zoning Alternative is expected to result in fewer environmental impacts than the Reduced Density Alternative. It is based on the requirement of the CEQA Guidelines, however, that the EIR is compelled to identify the environmentally superior alternative as something other than the “no project.”

Response to Comment 30-4

The comment does not address the adequacy of the Draft EIR, but expresses support for approval of the Existing Zoning Alternative without the inclusion of an EVA between Whitehawk II and Strap Ravine Estates. This comment has been forwarded to the decision-makers.