



January 31, 2019

Ms. Shirlee I. Herrington
Placer County Planning Services Division
3091 County Center Drive, Suite #190
Auburn, CA 95603

RE: Sunset Area Plan / Placer Ranch Specific Plan (PLN16-00341), Draft Environmental Impact Report Released for Public Review and Comment (February 22, 2019)

Dear Ms. Herrington:

In review of the subject documents, PCWA offers the following comments and may provide additional comments in the future as necessary:

Comments on the following sections of the draft EIR

03-Project Description

1. Per a meeting held on September 10, 2018, County staff agreed to include in this EIR the 42-inch pipeline from highway 65 to the eastern boundary of Placer Ranch. It appears that this document excludes pipelines outside of the Placer Ranch Specific Plan (PRSP). Exhibit 3-3, 3-19, 3-24 and page 3-66 does not incorporate the pipeline within this document. (Michele will talk with Ascent about how this was or was not incorporated).
2. Exhibit 3-3 shows PCWA Pipeline Alignment within Placer Parkway; however, the pipeline will be a transmission main through PRSP, as shown in Exhibit 3-19. The 42-inch pipeline should be included within this EIR, currently areas east of PRSP appear to not be included.
3. Exhibit 3-19 should show Sunset Area Point of Connection (POC) at west area, label all PCWA connections as POCs, not interties. Also should show offsite treated water pipeline extension to highway 65 and included in this EIR.
4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and included in this EIR.
5. This project is building a pressure reducing station at Campus Park Boulevard and Foothills Boulevard. This site should also include a possible future pump station. Please include discussion of a parcel for this infrastructure and modify language to get project level clearance for CEQA moving forward. This site would be granted to PCWA in fee. Criteria was discussed for this parcel and requirements were given at a meeting between PCWA and County staff on September 10, 2018.
6. There is no agreement in place for PCWA being the recycled water purveyor. Although anticipated, please revise areas where PCWA is listed as the recycled water purveyor. Page 3-53 list "The City of Roseville provides wholesale recycled water to PCWA, which would serve as the recycle water retailer for the PRSP area". PCWA does not retail recycled water yet, PCWA's 2015 UWMP does anticipate serving recycled water within this area.

4.15 Utilities

1. Potable Water Master Plan and Recycled Water Master Plan, Appendix F and G respectively, have date May 2017; however, the report and PCWA approved documents are July 18, 2017.
2. Provide a figure or narrative delineating the separation of the utilities within the roadway; ensuring Title 22 requirements are met.
3. 4.15-4 PCWA has deferred the first phase of the Ophir WTP past 2019. Suggest rewording sentence to “The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. Plans to begin construction on the first phase of the Ophir WTP and associated conveyance pipelines, would provide treatment capacity of 10 mgd.” Note, the design and permitting have been completed and construction will begin upon anticipated demand.
4. Page 4.15-19 Water Conservation: SB 606 and AB 1668 have been passed since the completion of the water master plans. These conservation measures authorize further water efficiency measures beyond SB x7-7, moving away from a comprehensive GPCD target. Even though water efficiency standards have not been fully established, this project should address how the new measures apply.
5. General: Policy 4.C.1. Per the Potable Water Master Plan, It is the intent of [the project] that two groundwater wells at either Parcels PR-93, PR-96 PR-97 would each have a projected capacity of 1.0 MGD, or approximately 695 GPM, and groundwater is of such quality that only disinfection will be required to meet California Drinking Water Quality Standards. If the available capacity or water quality does not achieve these objectives, the Developer shall, at its on costs, work with PCWA to relocate the well site within the Project to an alternate mutually agreeable site until these objectives are satisfied. Furthermore, the developer shall conduct groundwater study on the sub-basin’s water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill. Policy 4.C.1 partially addresses the comment, but more is needed, including, but not limited to: cost bore, other sites, if necessary, etc.
6. PR-97, parcel for the recycled water tank, pump station and well, went from 2.14 acres to 1.09 acres in the revised land use plan; however, no site plan was submitted to the Agency for approval. A site plan shall be submitted to confirm adequacy of property. With screening requirements of the infrastructure, the existing site may not be adequate. For tank and pump station locations, suggest screening to occur offsite where feasible – adjacent to park or open space areas.
7. Update the existing water distribution map (Exhibit 4.15-1) with current infrastructure. This infrastructure appears to be approximately 3 years old and several distribution mains appear to be not represented within this map. Distribution maps can be obtained by contacting brickards@pcwa.net
8. 4.15-40, “The Foothill WTP and Sunset WTP have approximately 1.8 mgd of capacity (as of January 2019) remaining” This document states 2.5 mgd, which is approximately 2 years old.
9. 4.15-40, Note that the 5.16 MG potable water storage tank will be co-located with a pump station and a lay-down yard for supplies.

In addition to the review of the draft EIR, PCWA offers the following edits of the Sunset Area Plan and the Placer Ranch Specific Plan. These comments have been carried over from previous Specific Plan comments that were provided as a PDF markup that were not addressed.

Placer Ranch Specific Plan Comments:

1. The treated water tank site should mention a pump station, an adjacent building, and lay down area for storage of parts and equipment.
 2. PCWA should be listed as the potable water purveyor for the region with specific reference to PCWA's Standards regarding water supply, storage, and distribution system infrastructure. Design standards for recycled water should be per the recycled water purveyor.
- Specific Plan Section 9 Utilities
 - Page 09-2
 - Add "of acceptable water quality" to the requirements of the wells within the Water Supply & Demand paragraph
 - Add "corridor, PR-87" after "via the Placer Parkway" in bottom-right paragraph and delete "roadway corridors"
 - Page 09-4
 - Reword the recycled water retailer to "PCWA or Placer County" in bottom-right paragraph. Improvements are to be constructed to retailer's standard
 - Wells are to be constructed to PCWA's standard, not Placer County.
 - PCWA is misspelled in second paragraph
 - Specific Plan Section 10 Implementation
 - Page 10-6
 - Revise entry of Maintenance Funding under Water Infrastructure row in Table 10-1 from "User Fees" to "PCWA fee"; also, add Table 10-1 to Table of Contents. See next comment.
 - Add Placer County Water Agency as a potential recycled water provider, current listing shows Placer County. Maintenance Funding of water and recycled water infrastructure should be the same.
 - Page 10-7
 - Clarification on Public Agency Impact Fees paragraph: PCWA is not part of the building permit process and permits can be pulled without connection charges assessed. PCWA does require a developer to enter into a Facility Agreement for funding and installation of facilities which can happen after issuance of a building permit
 - Other maintenance funding options listed in Table 10-1 should be described in maintenance funding options description (e.g., User Fee and Property Tax)
 - Development Standards Section 5 Public Facilities
 - Page 05-4
 - General Notes
 - If the available capacity or water quality of the groundwater does not achieve PCWA standards, the developer shall work with PCWA to relocate well site within Project to an alternate mutually agreeable site such that objectives are satisfied.
 - Developer shall conduct groundwater study on the sub-basin's water quality, with emphasis on how the basin may be affected by new domestic wells in proximity to landfill

- Replace “Placer County standards” with “all applicable codes” in the first requirement of Potable Water Facilities
 - Revise second requirement to say “Placer County Code, Division of Drinking Water, and PCWA requirements”
 - Revise fourth requirement to say “Groundwater wells, the PRV station at Foothills and Campus Park, and pumping stations...”
 - Page 05-5
 - Standards that apply to the water infrastructure solely is on the purveyor. For treated water it will be PCWA, for recycled water the document should allow for PCWA or Placer County – keeping the language general may be best.
- Design Guidelines Section 2 Landscape Architecture
 - Page 02-10
 - In general, pipelines should be within paved areas. Where select pipelines are within landscape corridors, trees and shrubs shall be prohibited within 10 feet of any water main

Sunset Area Plan Comments:

- Part II Section 9 Implementation
 - 9-5 Infrastructure Finance #5
 - Note that portions of the Sunset Area is within the City of Lincoln’s Sphere of Influence (specifically the Urban Reserve). Lincoln is a retailer for all areas within the City’s boundary and responsible for collecting connection charges.

If you have any questions or require additional information, please contact Brian Rickards at (530) 823-4845.

Sincerely,

Anthony L. Firenzi, P.E.
Deputy Director of Technical Services

TF:BR:sw