



County of Placer
Fish and Game Commission
11477 E Avenue • Auburn, CA 95603 • (530) 889-7372

Letter 6

District 1 - Don Gould
District 2 - Mark Fowler
District 3 - Jim Victorine
District 4 - Gary Flanagan
District 5 - Kari Freidig
District 5 - Mickey Daniels
District 5 - Scott Husmann

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

RE: Sunset Area Plan/Placer Ranch Specific Plan Draft Environmental Impact Report Comments

Dear Ms. Herrington:

On June 27, 2018, the Fish and Game Commission received an informational report and overview by Crystal Jacobsen, Placer County Principal Planner, regarding the Sunset Area Plan and Placer Ranch Specific Plan. The Commissioners also reviewed the DEIR for the project.

Upon review and discussion of the impacts and proposed mitigation measures for waters, aquatic life, fish, plants and wildlife, along with the immensity and scope of the project, it is clear that there will be potentially significant adverse effects and impacts to the environment and to these resources in the development area. Some adverse impacts were listed as not only "significant", but also "unavoidable". Our natural resources, plants, fish, wildlife and their habitat are not the winners in this proposed project.

Therefore, during the January 23, 2019, Fish & Game Commission meeting the Commission voted unanimously (5 in favor, 1 recusal, 1 absent) to recommend that the Board of Supervisors adopt "Alternative 3" of the draft environmental impact report for the Sunset Area Plan and Placer Ranch Specific Plan. This alternative includes a reduced footprint and reduced land development for the designated area. Our recommendation increases total acres in preserves to 3,600 and reduces the total area subject to development compared to the current proposed project.

We believe that the modifications included in Alternative 3 are in the best interest of the native plants, aquatic life, water systems, fish and wildlife of Placer County.

Sincerely,

[Handwritten signature of Mickey Daniels]

Mickey Daniels, Vice Chair
Placer County Fish & Game Commission

cc: Bonnie Gore, Supervisor, District 1
Robert Weygandt, Supervisor District 2
Kirk Uhler, Supervisor, District 4
Jennifer Montgomery, Supervisor, District 5
Todd Leopold, County Executive Officer



6-1

Letter 6	Placer County Fish and Game Commission Mickey Daniels, Vice Chair No date
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- 6-1 The comment recommends that the Placer County Board of Supervisors adopt Alternative 3. As described in Section 6.5, “Environmentally Superior Alternative,” of the Draft EIR, besides the No-Project-1997 SIA Plan Alternative, Alternative 3 is considered environmentally superior because it results in the greatest reduction of impacts, and it appears to meet most of the project objectives.

The comment is directed toward the project approval process and does not address the content, analysis, or conclusions in the Draft EIR. All comment letters submitted during the Draft EIR public review period will be reviewed and considered by the Placer County Planning Commission and Board of Supervisors before a decision on the project is rendered.



PLACER COUNTY WATER AGENCY
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**Letter
7**

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). 7-1
- 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. 7-2
- 3. Exhibit 3-19 should show Sunset Area Point of Connection (POC) at west area, label all PCWA connections as POCs, not inerties. Also should show offsite treated water pipeline extension to highway 65 and included in this EIR. 7-3
- 4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and included in this EIR. 7-4
- 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. 7-5
- 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. 7-6

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. | 7-7 |
| 2. Provide a figure or narrative delineating the separation of the utilities within the roadway; ensuring Title 22 requirements are met. | 7-8 |
| 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. | 7-9 |
| 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. | 7-10 |
| 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. | 7-11 |
| 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. | 7-12 |
| 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 | 7-13 |
| 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. | 7-14 |
| 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. | 7-15 |

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. 7-16
- 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. 7-17
- 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) 7-18
- 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”

Letter 7	Placer County Water Agency Anthony L. Firenzi, P.E., Deputy Director of Technical Services January 31, 2019
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- 7-1 The comment indicates that the PCWA water line is not mentioned in the Draft EIR once it leaves the Placer Parkway right-of-way. As noted in comment 8-1, page 3-66 of the Draft EIR states, “Water and Wastewater Infrastructure outside the PRSP Area,” first bullet point. This section describes the Placer Parkway water lines as included in the definition of “other supporting infrastructure.” Exhibit 3-3 of the Draft EIR clearly shows the PCWA pipeline alignment, including the segment between SR 65 to the eastern boundary of the PRSP area. (Note: See revised Exhibit 3-3 in Chapter 2, “Revisions to the Draft EIR,” which shows the corrected PCWA pipeline alignment within the PRSP area.) The Draft EIR (page 3-53) explains how the PRSP water distribution system would intertie with PCWA’s transmission and distribution system:

along the eastern edge of the plan area at Placer Parkway, Sunset Boulevard, and Nichols Road and would interconnect with the SAP potable water distribution system. The primary transmission backbone would be a 42/36-inch transmission main that would extend from the Placer Parkway tie-in to the western edge of the plan area via the Placer Parkway and Campus Park Boulevard roadway corridors. This would include a linkage to the proposed water storage tank. In addition to delivering water to the PRSP area, the transmission pipeline would also serve portions of the SAP area outside the PRSP area.

The Draft EIR provides further detail regarding the PCWA pipelines on page 3-66 indicating that the three 24-inch water lines would connect together west of the Whitney Ranch interchange into a 42-inch water line. This 42-inch water line would continue west for approximately 5,000 feet from the interchange within the Placer Parkway alignment to the eastern boundary of the PRSP area. This project infrastructure would be installed by PCWA as part of the PCWA Ophir Phase 1 and Phase 2 Infrastructure Project. The 42-inch line in Placer Parkway would become a 30-inch line west of the water tank proposed for the PRSP area. The Draft EIR (page 3-66) indicates that the water lines in Placer Parkway and the SR 65/Whitney Ranch Parkway interchange have already been approved with a certified EIR.

The Draft EIR (page 4-6) describes the organization of the impact analysis noting that each impact discussion is divided into the following subsections and includes a separate CEQA conclusions for each: the net SAP area, PRSP area, and other supporting infrastructure. The Placer Parkway water line falls under other supporting infrastructure as it is defined. Therefore, the conclusions for other supporting infrastructure include the Placer Parkway water by reference/definition of the other supporting infrastructure.

- 7-2 The comment states that Draft EIR Exhibit 3-3 does not correctly reflect the planned location of PCWA’s 42-inch pipeline and that portions of the pipeline east of the PRSP area are not included. See revised Exhibit 3-3 in Chapter 2, “Revisions to the Draft EIR,” which shows the corrected PCWA pipeline alignment within the PRSP area.
- 7-3 The comment requests that Draft EIR Exhibit 3-19 be updated to show the Sunset Area Point of Connection (POC) at the west area and that all PCWA connections be labeled as POCs, not interties. See revised Exhibit 3-19 in Chapter 2, “Revisions to the Draft EIR.”
- 7-4 The comment states that Draft EIR page 3-26 and Exhibit 3-3 should be revised to show offsite recycled water pipelines. Page 3-26 of the Draft EIR describes improvements within the SAP area, not off-site improvements. Improvements located outside of the project area are discussed on page 3-71. These include a description of recycled water pipelines. Also, Exhibit 3-3 shows PRSP-related infrastructure outside the PRSP area but within the SAP area (shown in green on the exhibit). Exhibit 3-3 also shows other supporting infrastructure evaluated in the EIR, which includes improvements

outside of the SAP boundary. Except for the PCWA pipeline alignment, Exhibit 3-3 is not intended to show specific types of pipelines and other improvements, but rather shows the areas where those improvements would be installed in order to inform the environmental analyses. Adding the recycled water pipelines to this graphic would result in the need to identify other specific types of infrastructure, which would require a level of detail that would not be supported by this graphic and would not help inform the environmental analysis of the Draft EIR. No revisions to the Draft EIR are necessary.

- 7-5 The comment seeks identification of pressure reducing station. Exhibit 3-19 in the Draft EIR shows proposed locations for PRV/PSV Stations, which are further detailed in the Placer Ranch Potable Water Master Plan. These stations will also be noted on the Large Lot Final Map for the PRSP.
- 7-6 The comment states that there is no agreement in place for PCWA to be the recycled water purveyor for the project, and that PCWA does not anticipate serving recycled water within the PRSP area, per PCWA's 2015 UWMP. In response to this comment, the ninth paragraph on page 3-53 of the Draft EIR is revised as follows:

The City of Roseville provides wholesale recycled water to PCWA, which ~~would~~ is anticipated to serve as the recycled water retailer for the PRSP area pending further discussion and agreement with the County. All recycled water improvements would be constructed consistent with PCWA and Placer County standards or City of Roseville standards for those lines located in the City of Roseville. Construction of PRSP recycled water infrastructure would be phased as needed to support development, with specific timing and funding obligations detailed in the *Placer Ranch Development Agreement*. Detailed information about the PRSP recycled water facilities and supplies, including technical analysis, is contained in the *Placer Ranch Recycled Water Master Plan* (Appendix G).

- 7-7 The commenter points out that the dates of the Potable Water Master Plan and Recycled Water Master Plan included as appendices to the Draft EIR are not consistent with later versions. As discussed in Chapter 2, "Revisions to the Draft EIR," May 2017 versions of several utilities master plans were included as appendices rather than the more current July 2017 versions. The July 2017 versions are included as Appendices A, B, and C of this Final EIR.
- 7-8 The comment requests a figure or narrative be added to the Draft EIR delineating the separation of utilities within roadways ensuring Title 22 requirements are met. The project is required to meet all local, state, and federal codes, including California Title 22 health and safety code. The Draft EIR does not need to provide details regarding how, specifically, the project would meet the code requirements. No revision to the Draft EIR is required.
- 7-9 The comment suggests a minor correction to the third paragraph on page 4.15-4 of the Draft EIR related to the timing of the Ophir water treatment plant (WTP). Consistent with the requested text change, page 4.15-4 of the Draft EIR is revised as follows:

The Ophir WTP has not yet been constructed, and timing is generally dependent on anticipated need. PCWA also plans to begin construction in 2018 on tThe first phase of the Ophir WTP and associated conveyance pipelines, which are currently under design and would provide treatment capacity of 10 mgd. The Ophir WTP would be constructed in three phases, for a total treatment capacity of 30 mgd (PCWA 2016a:3-4,39).

- 7-10 The comment suggests changes to the text regarding recently passed water conservation legislation. Specifically, the comment request that AB 1668 and SB 606 be discussed in the Draft EIR. SB 606 and AB 1668 establish guidelines for efficient water use and a framework for the implementation and oversight of the new standards, which must be in place by 2022. The two bills strengthen the state's water resiliency in the face of future droughts with provisions that include:

- ▲ Establishing water use objectives and long-term standards for efficient water use that apply to urban retail water suppliers; comprised of indoor residential water use, outdoor residential water use, commercial, industrial and institutional (CII) irrigation with dedicated meters, water loss, and other unique local uses.
- ▲ Providing incentives for water suppliers to recycle water.
- ▲ Identifying small water suppliers and rural communities that may be at risk of drought and water shortage vulnerability and provide recommendations for drought planning.
- ▲ Requiring both urban and agricultural water suppliers to set annual water budgets and prepare for drought.

These new regulations, which were passed in the legislature after the NOP was released, will apply to water suppliers and retailers and require long-term planning and efficiency standards. It is too early to understand, specifically, how (or if) these regulations might affect development in the project area; therefore, no revisions to the Draft EIR are provided. Also, the SAP and PRSP already include water efficiency measures that would be required for future development, and the County's WELO further enhances water efficiency.

7-11 The comment notes that General Plan Policy 4.C.1 does not go far enough to address issues related to water quality associated with proposed on-site wells. In response to this comment and to require additional water quality testing to ensure safety, SAP Policy PFS-3.1 on page 4.15-33 of the Draft EIR is revised as follows (these revisions apply to the SAP and to the Draft EIR):

- ▲ **Policy PFS-3.1: Water Supply Certification.** The County shall require applicants for new development approval to demonstrate the availability of a long-term, reliable surface water supply for all urban uses as well as recycled water, where available, as an optional water supply. The County shall require written certification from the water service provider that a long-term water supply is or will be available for the new development prior to occupancy. The County will also require any proposed on-site wells used for potable water to be evaluated to ensure the groundwater meets California Drinking Water Standards and, if not, that the well is either appropriately relocated (at the applicant's expense) or any necessary water treatment processes and monitoring systems are installed and operating.

The comment does not identify any issues with the analysis or adequacy of the Draft EIR. Other than the SAP policy edit identified above, which supplements General Plan Policy 4.C.1, no further revisions to the Draft EIR are required.

7-12 The comment notes that parcel PR-97 identified as the location for the recycled water tank changed in size from 2.14 acres to 1.09 acres in the revised land use plan. The comment states that no site plan for the smaller site was submitted to PCWA and that the existing site may not be adequate. The comment also suggests that screening of tanks and pump stations should occur off-site, where feasible. The Draft EIR did include an exhibit in the Placer Ranch Recycled Water Master Plan (Appendix G of the Draft EIR, Figure 4-2) that showed a recycled water tank facility could fit on 0.92 acre. Even though the parcel at the time of the study was 2.14 acres, it only utilized 0.92 acre for the tank and infrastructure. Screening of tanks and pump stations could also occur off-site on adjacent Open Space areas if necessary. Further, the County coordinated with PCWA regarding a site plan and design details for the updated PR-97 site. No changes to the Draft EIR are required.

7-13 The comment suggests updating Draft EIR Exhibit 4.15-1 to reflect current infrastructure. The Draft EIR used current information available at the time to establish the baseline. Minor updates in the infrastructure data do not require changes in the analysis or conclusions of the Draft EIR.

Additionally, the SAP is analyzed at a program level in the Draft EIR, and future projects will be required to study and show the most up-to-date infrastructure at that time.

7-14 The comment suggests a change to the text on page 4.15-40 of the Draft EIR regarding available capacity at the Foothill WTP and Sunset WTP. The comment provides a 2019 capacity update for the Foothill WTP and Sunset WTP. The Draft EIR provided the capacity as it was reported by PCWA in 2017, which was after release of the NOP (November 2016). This updated capacity estimate would not change the conclusions of the Draft EIR; therefore, no revisions are necessary.

7-15 The comment suggests a clarification to the text on page 4.15-40 of the Draft EIR regarding the potable water storage tank. Similar to the discussion in response to comment 7-12, the Draft EIR's evaluation of the recycled water tank was not based on a detailed, parcel-level site plan of the tank site. However, in response to the comment, the following additional minor details are added to page 4.15-40 of the Draft EIR:

As shown in Exhibit 4.15-4, PCWA transmission main pipelines would be extended through the PRSP area. The water distribution system in the PRSP area would consist of looping pipelines that form a transmission main grid consisting of 12-inch to 42-inch-diameter mains. The pipelines would be installed within collector and arterial roadway corridors. The system would include a 5.16-million-gallon potable water storage tank (co-located with a pump station and supply lay-down area) in the northwestern portion of the PRSP area, near Placer Parkway. Prior to construction of the water storage tank, site-specific geotechnical analysis would be prepared to confirm site suitability for the storage tank. The key components of the proposed potable water infrastructure system are shown in Exhibit 4.15-4. Note that the PCWA water transmission pipeline that would be installed in the Placer Parkway right-of-way is not identified in Exhibit 4.14-4. Please refer to Exhibit 3-3 for the location of the PCWA pipeline in Placer Parkway.

7-16 The comment seeks amendments to the PRSP. No changes to the Draft EIR are requested. The PRSP, Section 9, Section B. Potable Water will be amended to reflect that the treated water tank site should mention a pump station, an adjacent building and lay down area for storage of parts and equipment. No revisions to the Draft EIR are necessary.

7-17 The comment requests changes to the PRSP. No changes to the Draft EIR are requested. The PRSP text will be revised to describe the design standards of the recycled water purveyor. No revisions to the Draft EIR are necessary.

7-18 The comment seeks minor text amendments to the PRSP and SAP. No changes to the Draft EIR are requested. The PRSP and SAP have been amended to address the comments noted. No revisions to the Draft EIR are necessary.

From: Crystal Jacobsen
Sent: Tuesday, February 19, 2019 7:47 AM
To: Shirlee Herrington; Leigh Chavez
Subject: FW: Placer Ranch meeting follow up

<p>Letter 8</p>

FYI

From: Brian Rickards [mailto:brickards@pcwa.net]
Sent: Friday, February 15, 2019 3:20 PM
To: Michele Kingsbury <MKingsbu@placer.ca.gov>
Cc: Tony Firenzi <tfirenzi@pcwa.net>; 'Vance Jones' <vjones@msce.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Mike Parker <mike.parker@ascentenvironmental.com>; Sydney Coatsworth <sydney.coatsworth@ascentenvironmental.com>
Subject: RE: Placer Ranch meeting follow up

Michele,
 Thank you and Ascent. I appreciate your response. I will update PCWA’s letter to include some language below; although we will still make the comment to provide additional clarity.

8-1

Thank you, have a good weekend!
 Brian

From: Michele Kingsbury [mailto:MKingsbu@placer.ca.gov]
Sent: Thursday, February 14, 2019 3:31 PM
To: Brian Rickards <brickards@pcwa.net>
Cc: Tony Firenzi <tfirenzi@pcwa.net>; 'Vance Jones' <vjones@msce.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Leigh Chavez <LChavez@placer.ca.gov>; Mike Parker <mike.parker@ascentenvironmental.com>; Sydney Coatsworth <sydney.coatsworth@ascentenvironmental.com>
Subject: RE: Placer Ranch meeting follow up

Brian – hopefully below helps answer some questions.

1. PRS fee parcel. I believe you and Vance had spoken on how the LLTM will address that comment. If you need more information, please let me know.
2. Placer Parkway Pipeline from SR 65 to eastern edge of PRSP see page 3 – 66, “Water and Wastewater Infrastructure outside the PRSP Area”, first bullet point. This section describes the Placer Parkway water lines as included in the definition of “Other Supporting Infrastructure.”. Page 4-6 describes the DEIR approach which notes that “each impact discussion is divided into the following subsections and includes a separate CEQA conclusions for each:...The Net SAP Area, PRSP Area, and Other Supporting Infrastructure.” The Placer Parkway water line falls under Other Supporting Infrastructure as it is defined. Therefore, when you read each impact section, the conclusions for Other Supporting Infrastructure include the Placer Parkway water by reference / definition of the Other Supporting Infrastructure.

Let me know fi this makes sense. Michele

From: Brian Rickards [mailto:brickards@pcwa.net]
Sent: Wednesday, February 13, 2019 11:46 AM
To: Michele Kingsbury

Cc: Tony Firenzi; 'Vance Jones'
Subject: RE: Placer Ranch meeting follow up

Hi Michele,
I just spoke with Vance Jones and he said all of the Specific Plan comments are minor and easily addressed. In one month we will be working on carving out a parcel in the LLTM at Campus Park Blvd and Foothills for a Pressure Reducing Station, with possible future pump station.

I plan on finalizing my comment letter on Friday, please let me know if your discussion with Ascent changes the content of the letter. I will include all comments to the Specific and Area Plan.

Thank you,
Brian Rickards

From: Michele Kingsbury [<mailto:MKingsbu@placer.ca.gov>]
Sent: Friday, February 08, 2019 8:57 AM
To: Brian Rickards <brickards@pcwa.net>
Subject: Re: Placer Ranch meeting follow up

I will follow up

Sent from my iPhone

On Feb 8, 2019, at 8:39 AM, Brian Rickards <brickards@pcwa.net> wrote:

Good Morning Michele,
Any update on Ascent's review of PCWA's comments?

Thank you,
Brian

From: Brian Rickards
Sent: Friday, February 01, 2019 9:18 AM
To: 'Vance Jones' <vjones@msce.com>; Michele Kingsbury <MKingsbu@placer.ca.gov>
Cc: Crystal Jacobsen (cjacobse@placer.ca.gov) <cjacobse@placer.ca.gov>; Tony Firenzi <tfirenzi@pcwa.net>; Heather Trejo <htrejo@pcwa.net>; Brent Smith <BSmith@pcwa.net>
Subject: RE: Placer Ranch meeting follow up

Vance and Michele,
Thanks for your time this morning to talk through some of PCWA's comments. Based on our discussion, County staff will speak with Ascent to verify if comments were addressed in other locations and how some of these could be addressed. Michele, please let me know the conclusion of your discussion with Ascent. PCWA will finalize the comment letter within the next two weeks.

Vance, as discussed, you will give me a call next week to discuss some of the comments related to the Specific and Area Plan.

Thank you,

Brian Rickards, PE | Associate Engineer | Technical Services Department, Engineering Division
Placer County Water Agency | www.pcwa.net | 144 Ferguson Road | Auburn, CA 95603
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | brickards@pcwa.net

From: Vance Jones [<mailto:vjones@msce.com>]
Sent: Wednesday, January 30, 2019 11:46 AM
To: Michele Kingsbury <MKingsbu@placer.ca.gov>; Brian Rickards <brickards@pcwa.net>
Subject: RE: Placer Ranch meeting follow up

Folks, I'm open tomorrow or Friday morning. If one of those time slots work, please just send me a meeting invite for a call.

Thanks,

Vance Jones
MacKay & Soms Civil Engineers, Inc. | 1552 Eureka Road, Suite 100 |
Roseville, CA 95661 | P: 916.773.1189 | F: 916.773.2595 | E: vjones@msce.com | W:
www.msce.com
<image001.jpg>

From: Michele Kingsbury <MKingsbu@placer.ca.gov>
Sent: Wednesday, January 30, 2019 9:55 AM
To: Brian Rickards <brickards@pcwa.net>; Vance Jones <vjones@msce.com>
Subject: RE: Placer Ranch meeting follow up

I can make Friday at 8 am if you both can. I assume just a phone call.

From: Brian Rickards [<mailto:brickards@pcwa.net>]
Sent: Wednesday, January 30, 2019 9:04 AM
To: 'Vance Jones'
Cc: Michele Kingsbury
Subject: RE: Placer Ranch meeting follow up

Good Morning Vance,

I am reviewing the Sunset Area Plan/Placer Ranch Specific Plan dEIR and had to go back to our discussions during the Monday, September 10th meeting at the Domes. I was hoping to understand clearly how the PRS fee parcel was addressed as well as the Placer Parkway Pipeline from SR-65 to eastern edge of PRSP. Per the meeting, this EIR was going to address both of these items. Do you have time to discuss a few things with me this week. I am available at the following times:

1. Today 2:30-3:30,
2. Tomorrow after 9:30
3. Friday 7-9:00 am

Thank you,

Brian Rickards, PE | Associate Engineer | Technical Services Department, Engineering Division
Placer County Water Agency | www.pcwa.net | 144 Ferguson Road | Auburn, CA 95603
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | brickards@pcwa.net

From: Vance Jones [<mailto:vjones@msce.com>]
Sent: Tuesday, September 11, 2018 2:12 PM
To: Brian Rickards <brickards@pcwa.net>

Cc: Michele Kingsbury (MKingsbu@placer.ca.gov) <MKingsbu@placer.ca.gov>
Subject: RE: Placer Ranch meeting follow up

Brian- Thanks for following up with this information. ...and very good to meet you yesterday, as well. Couple things:

Regarding the easement for the 42" line, the draft LLTM provides a 25' wide easement along the eastern edge of Parcel PR-87 (previously PR-85), so we'll upsize that to 35'. Easy fix.

For the PRS, I've got a couple ideas that I'd like to bounce off of our team. Thanks for the additional information and parameters, as that will help us tremendously. I'll circle back with you to discuss an approach before we revise any maps or exhibits.

Finally, the updated land use plan is attached for your use – two versions. The larger file plots 36x55 and is at 400-scale. The smaller file prints 11x17 and includes a summary table. The current plan is dated April 20, 2018, so please be sure that this is the version that everyone's using as we move forward.

Thanks,

Vance Jones

MacKay & Soms Civil Engineers, Inc. | 1552 Eureka Road, Suite 100 |
 Roseville, CA 95661 | P: 916.773.1189 | F: 916.773.2595 | E: vjones@msce.com | W:
www.msce.com
 <image002.jpg>

From: Brian Rickards <brickards@pcwa.net>
Sent: Monday, September 10, 2018 12:15 PM
To: Vance Jones <vjones@msce.com>; 'Colleen Karbowski' <ckarbowski@westyost.com>
Cc: Michele Kingsbury - Placer County (mkingsbu@placer.ca.gov) <mkingsbu@placer.ca.gov>; Heather Trejo <htrejo@pcwa.net>; Tony Firenzi <tfirenzi@pcwa.net>; Jeremy Shepard <jshepard@pcwa.net>; Curtis Lam (clam@hydroscience.com) <clam@hydroscience.com>; Mark Sauer <msauer@msce.com>; Brent Smith <BSmith@pcwa.net>; Jeff Apps <JApps@placer.ca.gov>; LaRoy Jones Jr. <ljones@pcwa.net>; Andy Hamilton <ahamilton@pcwa.net>; Frank Helmick - West Yost (fhelmick@westyost.com) <fhelmick@westyost.com>; Sandie Hewston <shewston@pcwa.net>
Subject: Placer Ranch meeting follow up

Vance,

It was nice meeting you today. Below are my action items from today's Placer Ranch EIR meeting (and the Large Lot Final Map preparation).

1. **Width of the 42-inch pipeline easement:** 35 feet
2. **PRS (& future PS) size and location near Campus Park Blvd & Foothills:** See attached exhibit. PCWA will need up to 0.25 Acres (building footprint is approximated at 0.1 acres). The location is preferred to be as close as possible to the intersection to minimize PRVs or eliminate excessive parallel piping; however, we are okay with all of the alternatives. Foothill Blvd will be the delineation between the two pressure zones. *Note: all other Pressure reducing stations will likely not be in a large building and will still need vehicular access to, but is assumed to be within the Highway Easement or PUE.*

Feel free to call to discuss any questions you may have. Please forward me the revised Placer Ranch Land Use Plan when you get a chance.

Colleen,

Can you add a 24" stub to the North on the east side of Placer Ranch's boundary. Each stub, north and south, should be 10' east of the Placer Ranch property line.

Thank you,

Brian Rickards, PE | Associate Engineer | Technical Services Department, Engineering Division
Placer County Water Agency | www.pcwa.net | 144 Ferguson Road | Auburn, CA 95603
Company (530) 823-4886 | Direct (530) 823-4845 | Cell (530) 863-3246 | brickards@pcwa.net

**Letter
8**

Placer County Water Agency
Brian Rickards, P.E., Associate Engineer
September 10, 2018; January 30, 2019; February 1, 2019; February 13, 2019; and
February 15, 2019

-
- 8-1 The comment states that PCWA will update its comment letter dated January 31, 2019 (comment letter 7) to include language that came from discussions between County staff, project engineers, and PCWA. The updated comment letter is included as comment letter 9, below.



PLACER COUNTY WATER AGENCY
SINCE 1957
BOARD OF DIRECTORS
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Primo Santini, District 2
Mike Lee, District 3
Robert Dugan, District 4
Joshua Alpine, District 5
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144 Ferguson Road
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Letter
9

February 22, 2019
File No. Planning

sent via email

cdraecs@placer.ca.gov
Placer County Community Development Resource Agency,
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603

RE: Sunset Area Plan / Placer Ranch Specific Plan (State Clearinghouse No. 2016112012), Draft Environmental Impact Report (EIR)

To whom it may concern:

In review of the subject documents, Placer County Water Agency (PCWA) offers the following comments:

Draft Environmental Impact Report Comments:

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 provide indisputable proof that the pipeline is covered within this document.
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) on the west side, near the terminus. Please label all PCWA connections as "POCs" and all connections with other water purveyors as "interties."
4. Page 3-26 and Exhibit 3-3 should show offsite recycled water pipeline extension and include that extension 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 California Environmental Quality Act (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 to describe this as the intended, but not absolute outcome. Example: Page 3-53, "The City of Roseville

9-1

provides wholesale recycled water to PCWA, which would serve as the recycle water retailer for the PRSP area.”

- 7. Exhibit 3-24: The Placer Parkway pipeline does not appear to be covered by this EIR according to this map. Please provide additional clarity to ensure water line is covered in this document.
- 8. Page 3-66: Construction of the 42-inch pipeline west of the connection at Highway 65 may be constructed by PCWA or deferred to be constructed with and by the PRSP. This EIR should cover this entire pipeline from the tie-in at Highway 65 westward.

9-1
cont.

4.15 Utilities

- 1. Potable Water Master Plan and Recycled Water Master Plan, Appendix F and G respectively, are dated May 2017; however, the report and PCWA approved documents are dated 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. Page 4.15-4: PCWA has deferred the first phase of the Ophir Water Treatment Plant (WTP) past 2019, until demand warrants new treatment capacity. We 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: Senate Bill 606 (SB 606) and Assembly Bill 1668 (AB 1668) have been passed since the completion of the water master plans. These conservation measures authorize further water efficiency measures beyond Senate Bill x7-7, moving away from a comprehensive GPCD target. Even though water efficiency standards have not been fully established, this project should acknowledge this legislation.
- 5. Page 4.15-24, 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 million gallons per day (MGD), or approximately 695 gallons per minute (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 own cost, 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 a 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 the landfill. Policy 4.C.1 partially addresses the comment, but more is needed, including, but not limited to: burdened cost, additional sites, landfill impacts, etc.
- 6. Parcel PR-97, 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. Exhibit 4.15-1: Update the existing water distribution map 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. Page 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.

9-2

- 9. Page 4.15-40: Note that the 5.16 million gallon potable water storage tank will be co-located with a pump station and a lay-down yard for supplies.

9-2
cont.

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.

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.
- 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.
 - Section 10 Implementation
 - Page 10-6
 - Revise entry of Maintenance Funding under Water Infrastructure row in Table 10-1 from “User Fees” to “PCWA fees”; 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 building permits can be pulled without connection charges assessed. PCWA does require a developer to enter into a Facilities Agreement for funding and installation of facilities which can happen after issuance of a building permit. We suggest rewording to “The fee structure requires the payment of fees prior to issuance, or finalization, 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

9-3

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 “per the requirements of the Placer County Code, Division of Drinking Water, and PCWA requirements.”
 - Revise fourth requirement to state “Groundwater wells, the PRV station at Foothills and Campus Park, and pumping stations...”
- Page 05-5
 - The recycled water purveyor will likely be PCWA or Placer County; therefore, we suggest standards for the recycled water infrastructure shall be per the purveyor. PCWA will be the treated water purveyor and shall be constructed per PCWA standards.
- 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

9-3
cont.

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.

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

Sincerely,



Brian Rickards, P.E.
Associate Engineer
brickards@pcwa.net

BR:TF:sw

CC:
Brent Smith, bsmith@pcwa.net
Heather Trejo, htrejo@pcwa.net
Tony Firenzi, tfirenzi@pcwa.net
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Shirlee Herrington, SHerring@placer.ca.gov

Letter 9	Placer County Water Agency Brian Rickards, P.E., Associate Engineer February 22, 2019
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This comment letter is virtually the same as the content of comment letter 7. Therefore, the responses simply cross-reference to responses to this letter.

- 9-1 See responses to comments 7-1 through 7-6.
- 9-2 See responses to comments 7-7 through 7-15.
- 9-3 See responses to comments 7-16 through 7-18.

Churchwell **White** LLP

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**Letter
10**

Robin R. Baral
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February 22, 2019

VIA U.S. MAIL & EMAIL (cdraecs@placer.ca.gov)

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

**Re: Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
(State Clearinghouse No. 2016112012)**

Dear Ms. Herrington:

Churchwell White LLP represents Western Placer Waste Management Authority (the “Authority”) in connection with its review of the Sunset Area Plan/Placer Ranch Specific Plan (the “Project”). This letter provides the Authority’s comments to the draft environmental impact report for the Project (the “Draft EIR”). In addition, attached to this letter is a technical report from environmental consultants who are deeply familiar with operations at the Western Regional Sanitary Landfill (“WRSL”), as their previous work is cited and referenced in Appendix J to the Draft EIR.

As you know, the WRSL is located in the center of the Sunset Area Plan (“SAP”), adjacent to the northern boundary of the Placer Ranch Specific Plan (“PRSP”). The Project, as currently proposed, would replace the existing landfill buffer, which currently prohibits any residential development within one mile of the WRSL site, with a new buffer that would allow residential development up to 1,000 feet from the perimeter of active landfill and recycling operations. The Project could also potentially allow commercial and recreational uses to encroach within the buffer zones of 1,000 feet and 500 feet, respectively.

In December 2016, the Authority submitted comments in response to the Notice of Preparation for the Draft EIR (“NOP”). The Authority’s NOP comments detailed the critical importance of the WRSL site and the existing buffer zone, along with policies for adopting mitigation measures that Placer County (the “County”) should consider as the lead agency for the Project. While the Authority appreciates its ongoing discussions with the County, the Authority has concerns that the Draft EIR does not adequately analyze the reduced buffer zone. In addition, the Draft EIR does not incorporate feasible

10-1

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Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
 February 22, 2019
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mitigation measures, as required under CEQA, to reduce the reasonably foreseeable air quality and other impacts related to the reduced buffer zone and the proposed encroachment of development in close proximity to the WRSL.

If the landfill buffer must be reduced, the attached technical report shows that mitigation measures are available that would likely reduce potential odor impacts at the PRSP to a less-than-significant level. CEQA therefore requires the County to incorporate odor-reducing mitigation measures into the Draft EIR, especially given that the reduced landfill buffer is the central feature of the Project that would directly cause a significant increase in odor impacts if additional measures are not implemented.

10-1
 cont.

1. The proposed buffer zone policy is internally inconsistent with the General Plan.

The Placer County General Plan was last updated by the County Board of Supervisors on May 21, 2013 (the “General Plan”). Under State law, the General Plan must include an integrated, internally consistent, and compatible statement of policies.¹ When elements of a general plan are found to be internally inconsistent, on judicial review, “the appropriate remedy is to issue a writ of mandate requiring a county’s board of supervisors to set aside the inconsistent elements so that they can be amended to achieve the statutorily required correlation and consistency.”² In addition, under CEQA, the Draft EIR must disclose if the Project is inconsistent with any applicable land use plan, policy, or mandatory provision in the General Plan.³

The Project proposes to develop residential, commercial and recreational uses within the existing and proposed landfill buffer zones, along with General Plan amendments that, if adopted, would result in an internal, irreconcilable inconsistency with the following mandatory provision in the General Plan:

10-2

BUFFER ZONE PRESERVATION

Land use buffer zones shall be reserved and guaranteed in perpetuity through land acquisition, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent proposed development projects providing the necessary funding.⁴

Both the PRSP and SAP would authorize commercial, recreational and residential development within the existing and proposed landfill buffer zones. The Draft EIR Project Description, however, makes no reference to this conservation requirement.

¹ Cal. Gov. Code § 65300.5.

² *Murrieta Valley Unified School Dist. v. County of Riverside* (1991) 228 Cal.App.3d 1212, 1235.

³ 14 Cal. Code Reg. § 15125; Placer County Environmental Checklist.

⁴ Placer County General Plan, Part 1, Land Use/Circulation Diagrams and Standards p. 24.

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Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
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Although the Draft EIR refers to agricultural and open space easements in Chapter 4.10 (Land Use) and public trail easements in Chapter 4.13 (Public Services), it makes no reference to the landfill buffer conservation easement requirement, or that adjacent development projects, such as PRSP, must bear the cost of acquiring such easements.

In addition, the Draft EIR does not discuss how the proposed General Plan amendments to further reduce the residential landfill buffer zone from 2,000 to 1,000, or to further reduce the commercial and recreational buffers to less than 1,000 and 500 feet, should be reconciled with the General Plan’s mandatory provision to permanently conserve all land within the buffer zone.

The County’s existing landfill buffer policy culminated after the result of a lengthy, multiyear General Plan update throughout the 1990’s. The conservation easement requirement clearly represents a General Plan policy “adopted for the purpose of avoiding or mitigating an environmental effect.”⁵ If the County’s intent now is to transition from a conservation policy to a development model within the landfill buffer, this change in policy must be thoroughly analyzed in the Draft EIR. The baseline condition requiring the acquisition of conservation easements must be disclosed and analyzed, impacts related to the removal of the conservation requirement must be identified, and additional or functionally equivalent mitigation measures necessary to reduce future land use conflicts with the WRSL must be implemented.

The Authority is willing to discuss functionally equivalent mitigation measures that could preclude the need for conservation easements, provided that such measures include an ongoing enforcement mechanism, similar to an easement in perpetuity. Examples of ongoing mitigation measures are provided in the technical report. In addition, durable finance mechanisms must be adopted to ensure that mitigation measures can be implemented in an incremental, ongoing basis throughout the 80-year buildout scenario contemplated in the Draft EIR. Further refinements to the mitigation measures in the Draft EIR are clearly needed, depending on the County’s proposed resolution of the conservation requirement.

Lastly, to fully ensure General Plan consistency, the County should closely review the requirements set forth in Part III (General Standards for Consideration of Future Amendments to the General Plan). Part III includes other mandatory considerations related to the existing landfill buffer zone and other provisions that must be reconciled with the proposed General Plan amendments for the Project.

10-2
cont.

⁵ Placer County Environmental Checklist.

{CW074049.3}

Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
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2. Solid waste generated by the proposed Project may exceed operational capacities at the WRSL.

Chapter 4.15 of the Draft EIR (Utilities) examines waste management operations at the WRSL. The Environmental Setting in Section 4.15.2 briefly discusses the key components of the WRSL, such as the Materials Recovery Facility (MRF), which includes separate processing of construction and demolition waste, and green waste. The Environmental Setting also briefly describes composting and landfill operations at the WRSL, in addition to the Permanent Household Hazardous Waste Collection Facility.

In the analysis of Impacts and Mitigation Measures, however, Chapter 4.15 examines the capacity of the landfill area only, and does not analyze the individual components that comprise the WRSL site, which were clearly identified in the previous section. On closer review of the MRF, for example, the construction, demolition and green waste operations are currently near their maximum operating capacities. Implementation of the Project could therefore exceed the ability of the WRSL and MRF to adequately process construction, demolition and green waste. As a result, the Draft EIR incorrectly concludes that “[t]he MRF and the WRSL have adequate capacity for disposal of solid waste generated by construction and operation of the PRSP.”⁶ Implementation of the Project will in fact result in potentially significant impacts to the operational capacity of the MRF, and additional mitigation measures are necessary to address this impact.

Although the Draft EIR notes that the Authority is currently proceeding with a master planning process to improve and increase operations at the site, these expansion plans remain highly conceptual and are not yet complete. In addition, even if the master planning process had concluded, the Project must address actual capacity limitations and implement measures to address impacts related to the Project, such as the generation of construction and demolition waste, and green waste, that could potentially exceed the current operational limits at the WRSL.

10-3

3. The Draft EIR must include mitigation measures to finance the facilities, services and personnel that would be required to reduce odors at the WRSL

The Draft EIR finds that the “cumulative demand for solid waste services would be a potentially significant impact.”⁷ In addressing this potential impact, however, the Draft EIR states that the PRSP and SAP would be “required by Placer County General Plan Policies 4.B.1 and 4.B.2 to pay their fair share of the cost of all existing public facilities and the cost of upgrading existing [solid waste processing] facilities or constructing new facilities that would be needed to serve the new development,” and that “[t]hese

10-4

⁶ Draft EIR, p. 4.15-57.

⁷ Draft EIR, p. 4.15-69.

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Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
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policies would serve to avoid any project contribution to significant adverse effects related to solid waste disposal. The impact would be less than significant.”⁸

The Draft EIR, however, does not specifically identify how the Project would contribute fair share fees to contribute towards the new facilities, operations and personnel that would be needed at the WRSL. In addition, additional contributions are needed so that the Authority can implement additional measures to reduce odors, especially where such measures would not otherwise be needed, but for the reduced landfill buffer. Moreover, tipping fees by themselves may be insufficient to generate sufficient revenue over the long term to address the level of odor reduction that may be needed to ensure that future land use conflicts are avoided if the existing landfill buffer is reduced.⁹ In addition, where the need for additional odor reductions are needed directly as a result of development of the PRSP within the landfill buffer, the costs for addressing those impacts should not be spread to all WRSL customers through generally applicable tipping fees.

10-4
cont.

Throughout other sections of the Draft EIR, mitigation measures are proposed to require the payment of fair share fees, and the creation of special taxes and assessments to fund additional facilities, maintenance and personnel costs that will be required as a result of the buildout of the Project.¹⁰ In addition, the Draft EIR includes mitigation measures regarding transportation improvements and the Pleasant Grove Retention Facility, both of which are offsite to the Project. Similar mitigation measures must be implemented to address the new facilities, operational adjustments, and new personnel that will be required at the WRSL to address potential odor impacts directly caused by the development and buildout of the Project within the existing landfill buffer.

4. The Draft EIR’s analysis in Impact 4.3-6 is inconsistent with the odor analyses in Appendix J and must be revised.

The Draft EIR’s analysis of odor impacts raises several concerns that must be corrected prior to the County taking any action to certify the EIR or approve the Project.

Under Impact 4.3-6, the Draft EIR asserts that “odor impacts are subjective and there are no quantifiable thresholds of significance...” Appendix J to the Draft EIR, however, clearly states an established threshold of significance using the dilutions to threshold (“DT”) metric:

10-5

Generally, odor is frequently considered likely to be offensive when it exceeds 10 DT, may be considered offensive when it exceeds 8 DT, and is

⁸ *Id.*

⁹ See, e.g., Landfill Tipping Fees in California, CalRecycle February 2015

¹⁰ See, e.g., Mitigation Measures 4.13-1a, 4.13-2, 4.13-4, 4.13-8,

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Sunset Area Plan/Placer Ranch Specific Plan Draft EIR
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sometimes considered offensive when it exceeds 5 DT. These thresholds are sometimes used as regulatory odor nuisance thresholds and are illustrative of the range of odor concentrations that are considered a nuisance.¹¹

Appendix J therefore provides a quantifiable metric with regard to odor impacts that the Draft EIR should incorporate as its significance threshold for odors.

Moreover, the Draft EIR mistakenly relies on unrelated holdings by the First District Court of Appeal,¹² regarding Receptor Thresholds, to conclude that the Draft EIR is “not strictly required” to evaluate impacts of existing odor sources such as WRSL. The WRSL Incremental Odor Evaluation in Appendix J clearly demonstrates that the Project would exacerbate existing odors generated by the WRSL if additional mitigation measures are not implemented. In addition, odor impacts are directly relevant in this case because the General Plan amendment for the Project proposes to reduce the landfill buffer zone to allow residential, commercial and recreational uses to encroach closer to the WRSL. Reduction of the buffer zone therefore serves as the key Project feature that would potentially expose future residents to odors, and buildout of the Project would generally lead to the production of more waste that would also serve to exacerbate the potential for future odor impacts from the WRSL.

Appendix J analyzes existing, baseline odors, baseline odors plus the Project, and future odors plus the Project, to determine the incremental impact of Project-related odors. Appendix J then concludes that the odor intensity and footprint of the WRSL site will continue to increase, and that the solid waste generated by the Project will play a significant role in contributing to that increase. The Draft EIR, however, ignores the analysis in Appendix J and concludes that “neither Placer County nor PCAPCD has adopted nor subscribes to any specific scheme of odor standards or thresholds.”¹³

Ultimately, Appendix J constitutes substantial evidence of a significant odor impact that would be caused directly by the Project’s proposed removal of the landfill buffer zone, and the Project’s incremental contribution of solid waste disposal at the WRSL.

Whether or not the County applies a quantitative or qualitative significance threshold with regard to odors, the Draft EIR concludes that odor impacts resulting from implementation of the Project would be significant. Despite this significance finding, however, the Draft EIR proposes no mitigation measures to reduce potential odor impacts. On the other hand, the Draft EIR explains that the County rejected a proposal

10-5
cont.

¹¹ Draft EIR, Appendix J, WRSL Incremental Odor Evaluation, p. 6

¹² *California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2016) 2 Cal.App. 5th 1067

¹³ Draft EIR, p. 4.3-50.

{CW074049.3}

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to adopt a regional mitigation fee to address improvements at the WRSL site that would reduce odor impacts.¹⁴

Again, the failure to implement feasible mitigation measures pursuant to Impact 4.3-6 is somewhat baffling, given that the proposed reduction of the landfill buffer zone is a key component for allowing the proposed buildout of the PRSP. Although the Authority is proactively evaluating site improvements at the WRSL to reduce odors, the reduced buffer zone will undoubtedly require the Authority to take additional measures, with additional costs, that would not need to be incurred except due to the development of PRSP and SAP within the existing buffer zones.

As noted above, the Draft EIR references the County’s General Plan policy requiring new developments to pay their fair share for the cost of new facilities and services. Impact 4.3-6 therefore must include enforceable mitigation measures to ensure that fair share contributions are provided through the development of the PRSP and SAP, especially where the need for new services, facilities and personnel is directly caused by the reduced landfill buffer zone. Those costs should not be borne by the Authority, nor its Member Agencies or existing ratepayers.

5. The Draft EIR’s analysis in Impact 4.15-11 must be revised to include enforceable mitigation measures, to reduce potential odor impacts that will be directly caused by the reduced landfill buffer zone.

Under CEQA, the County clearly has the authority to adopt measures requiring the developer and future properties within the SAP or PRSP to mitigate odors at the WRSL, provided that such measures are proportional to the impacts caused by the Project.¹⁵

Under Impact 4.15-11, the Draft EIR finds that the reduced landfill buffer zone will lead to increased complaints regarding the WRSL if additional measures are not taken to reduce odors. Rather than identify mitigation measures to address this impact, however, the Draft EIR states that the Authority is proactively engaged in community outreach, and taking measures to reduce odors from the WRSL. In reciting all of the current actions taken by the Authority to reduce potential odor impacts, the Draft EIR ignores the implementation of mitigation measures to address potential future land use conflicts due to the reduced landfill buffer zone.

The Authority will undoubtedly be required to greatly accelerate its current outreach and odor management operations in order to adjust to residential, commercial and recreational encroachment proposed by the PRSP and SAP. The Draft EIR concludes, however, without any substantial evidence, that the potential risks to expansion of the WRSL due to the reduced buffer zone are speculative. On the contrary, landfill

10-5
cont.

10-6

¹⁴ Draft EIR, p. 4.3-51.

¹⁵ 14 Cal. Code Reg. § 15126.4.

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expansions have constantly been the target of litigation, regardless of the investments made by those agencies, or their importance as assets to the community. Bringing additional residents closer to the landfill buffer will significantly increase the risk of additional lawsuits, especially if the Project does not contribute to suitable measures to reduce odors at the WRSL.

Even with the execution of landowner notices, implementation of the Project will require the Authority to introduce additional odor control measures that would not otherwise be needed if the existing landfill buffer zone remained in place. Existing customers should not be required to incur costs related to new development that is encroaching onto the existing landfill buffer zone.

6. Numerous mitigation measures are available to reduce odor impacts and operational deficiencies at the WRSL caused by the Project.

Mitigation Measure 4.10-2 in the Draft EIR identifies some basic measures for mitigating odor impacts for the properties located within the PRSP and SAP. Building design, landscaping buffers and deed notifications are important elements that should remain as mitigation measures for the Project. Downstream measures to reduce potential odor impacts, however, are far less effective than source controls at the WRSL, which would achieve much greater odor reductions. Mitigation measures must be implemented to require the PRSP and SAP to contribute to operational and facility improvements at the WRSL, in order for the County to justify any reduction to the existing landfill buffer.

In Appendix J, SCS Engineers provides a Review of Odor Management at the WRSL, which expressly finds that additional mitigation measures should be implemented at the WRSL to reduce potential odor impacts, thereby reducing future land use conflicts. For example, the SCS report identifies gas flaring improvements, expanded use of misters, the use of additional covers and other improvements that would reduce odors at the WRSL. Appendix J is based in part on a literature review, including the 2015 EMC report prepared by the CE Schmidt and TR Card, who have prepared the attached technical report.

The attached technical report reviews potential mitigation measures proposed in Appendix J, and the report suggests a broader array of measures for reducing odors at the WRSL. Potential mitigation measures identified by SCS Engineers, and elaborated by the attached report, include the following:

- Improved use of gas flaring and engines;
- Development of an automated gas system to respond to changes in barometric pressure and optimized gas recovery;

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10-6
cont.

10-7

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- Improvements to landfill cover and use of temporary membrane landfill covers;
- Ongoing system-wide assessments;
- Greater use of odor reducing agents;
- Development of a biosolids and wood waste processing facility;
- Incorporation of odor masking agents during the use of misters;
- Improvements to, and scaling up of, aerated static pile composting;
- General odor controls, such as tree lines, meteorological monitoring, odor monitoring on the PRSP and SAP sites; and
- Dedicating Authority personnel to ongoing odor inspection, management and supervision.

The report concludes that effective odor reduction mitigation strategies can be implemented on the WRSL site to achieve an odor emission reduction of around 80%. If such reductions were achieved, the reduced landfill buffer would cause far less odor impacts. Odor episodes would be less frequent, with shorter duration, and with lower concentration or drift to offsite areas of the WRSL.

Based on the attached report, an 80% reduction of the existing odor profile at the WRSL is possible, using known techniques. Over time, additional measures will likely emerge to further control and reduce odors at the WRSL. Under either a qualitative or quantitative approach to analyzing odor impacts, measures to reduce odors must be implemented as enforceable mitigation measures for the Project, in-lieu of the existing requirement in the General Plan to permanently conserve all land within the landfill buffer zone.

Additional air dispersion modeling would help to refine the quantitative (or qualitative) reduction that additional mitigation measures could provide to reduce odors from the WRSL. Those additional mitigation measures must be implemented if the modeling shows that their implementation would significantly reduce the DT level or hedonic tone, especially in the areas proposed for development within the reduced landfill buffer zone. In addition, measures must be implemented to allocate the fair share of those costs to the Project. The Authority looks forward to working with the County in

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10-7
cont.

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this modeling, to identify the most cost-effective measures for the Draft EIR to implement.

10-7
cont.

7. The Draft EIR must examine alternatives to the proposed landfill buffer.

The reduced landfill buffer is a key component of the PRSP, as currently envisioned. Several commenters to the NOP raised concerns regarding the proposed reduction of the landfill buffer. The Draft EIR therefore should have analyzed a Project alternative in which the landfill buffer zone remained in place, with development intensities revised to account for the existing landfill buffer.

10-8

8. The Draft EIR should analyze alternative alignments for water and recycled water lines.

Figure 4.15-4 in the Draft EIR identifies a new 12-inch potable water pipeline extending through the center of the Authority's property located directly to the east of the WRSL. In addition, Figure 7 in Appendix B to the Draft EIR identifies an 8-inch recycled water pipeline extending along this same alignment. The Authority is currently developing a master plan that could entail the placement of a new landfill on the parcel to the east of the WRSL. The placement of pipelines through the Authority's property therefore may be infeasible. Alternative pipeline alignments that do not cut through the Authority's property should be considered in the Final EIR.

In conclusion, the purpose of this letter is to identify areas where the Draft EIR should be revised in accordance with CEQA and, more importantly, to address additional measures that the Draft EIR must implement, as required under CEQA, to mitigate the direct impacts that would result from the reduction of the existing landfill buffer.

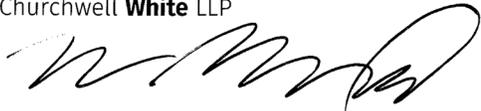
10-9

Although the Authority has additional concerns regarding other aspects of the Project, this letter focuses on the proposed landfill buffer as the key issue that threatens the long-term viability of the WRSL. If warranted, the Authority may submit additional comments regarding other aspects of the Project at a later date.

Lastly, résumés for CE Schmidt and TR Card are provided for reference, to illustrate their extensive background in air quality impacts relative to landfills and project siting; the Authority does not intend for the County to provide any responses to those materials in the Final EIR.

Sincerely,

Churchwell **White** LLP



Robin R. Baral

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Letter 10	Western Placer Waste Management Authority Robin R. Baral, Churchwell White LLP February 22, 2019
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- 10-1 The comment suggests that the Draft EIR does not appropriately analyze the reduction of the landfill buffer, and it states that mitigation measures are available to reduce odor impacts in the PRSP area to a less-than-significant level. See Master Response 4: Odors regarding the Draft EIR's discussion of odors, the landfill buffer, and mitigation measures.
- 10-2 The comment suggests that the project's proposal to amend the County's General Plan sanitary landfill buffer policy is inconsistent with the General Plan's provision related to buffer zone preservation.

The "Land Use Buffer Zone Standards" section on page 18 in the County's General Plan notes:

This General Plan requires the use of buffer zones in several types of development. While the exact dimensions of the buffer zones and specific uses allowed in buffer zones will be determined through the County's specific plan, land use permit, and/or subdivision review process, buffer zones must conform to the following standards (as illustrated conceptually in Figures 1-3 through 1-6); provided, however, different buffer zone standards may be established within a Specific Plan as part of the Specific Plan approval.

This language clearly states that the buffers outlined in the General Plan Land Use Buffer Zone Standards are to be considered, applied, and determined through project review and that different buffer zone standards may be established within a Specific Plan. To that end, the PRSP and any future specific plan proposed within the Sunset Area may propose buffer zones that differ from what is illustrated in the General Plan.

The comment's assertion that the project's proposal to modify the General Plan sanitary landfill buffer zone is inconsistent with the "Buffer Zone Preservation" provision contained within the Land Use Buffer Zone Standard section of the General Plan is incorrect. As outlined above, when applying buffer zone standards through project review, the first step is to assess what buffer applies to the project. Following that determination and application of the applicable buffer zone for a project, the relevant buffer zone standards and related provisions contained within the Land Use Buffer Zone Standard section of the General Plan are then required to be "reserved and guaranteed in perpetuity through land acquisitions, purchase of development rights, conservation easements, deed restrictions, or similar mechanisms, with adjacent proposed development projects providing the necessary funding." The purpose of this provision is to protect and memorialize the established buffer zone after it has been applied to a project. Therefore, the project's proposal to modify the sanitary landfill buffer zone is not inconsistent with this provision.

- 10-3 The comment states that the Draft EIR evaluated the capacity of the landfill only but that it did not evaluate the capacity of the various components. The comment states that the construction, demolition, and green waste operations are nearing maximum capacity and may not have adequate capacity to serve the project as concluded in the Draft EIR. The comment further states that while WPWMA is currently working on expansion plans, these plans are conceptual and not yet complete.

Analyses of impacts related to solid waste capacity do not typically break down the overall capacity of a facility into individual components of a facility. However, for purposes of clarity, additional information is being provided as part of this response. WPWMA's 2016 Transfer Processing Report (TPR) for the MRF provides some of the capacity data for the individual MRF components described by the comment. The TPR (page 8) states that the capacity of the MRF is comprised of the processing capacity (the ability to convey and sort through the waste and other materials) and the storage capacity (the physical ability of the plant to store materials prior to being processed). The

combined processing capacity of the construction and demolition, green and wood waste, and expanded composting areas of the MRF is 400 tons per day. The TPR outlines the typical quantities of materials received per day within these three categories: 185 tons of construction and demolition materials, 173 tons of green waste, and 8 tons of wood waste. Therefore, the facility currently receives 366 tons of these materials per typical day, which represents approximately 29 percent of the typical daily waste received by the MRF, and the MRF has 34 tons per day of available processing capacity for these categories of materials (CalRecycle 2016).

Regarding construction waste, the Draft EIR states that construction in the net SAP area would, after recycling and/or salvaging a minimum of 65 percent of construction waste, generate 115,895 cubic yards, or 66,225 tons (see Draft EIR, page 4.15-54). Spread across an 80-year buildout period, development in the net SAP area would generate 828 tons of construction waste per year, or 2.3 tons per day. Construction in the PRSP area would generate 43,886 tons of construction waste, which, spread across the PRSP’s expected 20-year buildout period, would be 2,194 tons of construction waste per year, or 6 tons per day. Therefore, construction waste generated by development in the net SAP area and PRSP area would be 8.3 tons per day combined, which would represent less than a 5-percent increase in daily construction and demolition waste received at the MRF.

Operation of the project would generate green waste and wood waste. An estimated breakdown and total are provided in Table 3-7. As shown in Table 3-7, the project would generate approximately 10.1 tons of green waste and wood waste per day, which constitutes less than a 6-percent increase in daily green waste and wood waste received at the MRF.

Table 3-7 Estimated Project-Generated Green Waste and Wood Waste¹

Land Use Type	Percent of MSW Stream	Net SAP Area (tons/day)	PRSP Area (tons/day)	Total (tons/day)
Residential ²	5.5	1.1	2.8	3.9
Commercial ³	9.3	3.04	2.2	5.2
Industrial ⁵	1.0	0.7 ⁶	-	0.7
University ⁷	5.4	-	0.3	0.3
Total				10.1

¹ Includes Leaves and Grass, Prunings and Trimmings, and Branches and Stumps from CalRecycle’s waste stream rate table for Placer County

² Uses CalRecycle’s “Residential” waste stream rate tables

³ Uses the “Services-Professional, Technical, and Financial” Business Group from CalRecycle’s Commercial waste stream rate tables

⁴ Includes SAP Categories General Commercial, EMU, and Business Park from Draft EIR Table 4.15-13

⁵ Uses the “Manufacturing-All Other” Business Group from CalRecycle’s Commercial waste stream rate tables

⁶ Includes SAP Categories Innovation Center, Eco-Industrial, and Light Industrial from Draft EIR Table 4.15-13

⁷ Uses the “Education” Business Group from CalRecycle’s Commercial waste stream rate tables

Source: Compiled by Ascent from SAP/PRSP Draft EIR and CalRecycle 2019

The project’s total combined construction and demolition waste, wood waste, and green waste would be 18.4 tons per day, which is approximately 54 percent of the 34 tons per day of available processing capacity for these categories of materials. Therefore, it appears that, even within these individual components of the MRF, there is adequate capacity to serve the project.

Unlike the landfill capacity discussion in the Draft EIR, processing capacity associated with the MRF is not based on a finite resource (such as the area of a landfill). Processing capacity can be increased with an increase in equipment, staffing, etc. Under a buildout horizon of 80-plus years for the net SAP area and 20 years for the PRSP area, the processing capacities associated with the MRF would likely be adjusted. In the unlikely event that processing capacity is not adjusted, and solid waste generated under cumulative buildout conditions exceeds the capacity of these individual components of the MRF, then these types of waste may need to be hauled elsewhere. But this circumstance is speculative and does not require evaluation in the Draft EIR.

Regarding storage capacity, the TPR indicates that the MRF had a storage capacity of 1,800 tons of unprocessed materials and a storage capacity of the construction and demolition waste and wood and green waste of 2,350 tons. The Draft EIR states (page 4.15-57) that, combined, operation of new uses in the net SAP and PRSP areas would generate 201 tons of solid waste on a daily basis. Therefore, the daily waste generated would consist of 11 percent of the storage capacity. However, as stated in the Draft EIR, the daily waste generated is 36 percent of the available daily permitted processing capacity. If the facility has sufficient storage to achieve its processing capacity and the project's daily waste would consume less of the storage capacity than the processing capacity, then the project would likely have enough storage capacity to serve the project. Also, as discussed above, storage capacity is not a finite resource, and given the long-term buildout of the net SAP area and PRSP area, it is likely that storage capacity would be adjusted. If it is not, then waste may need to be hauled elsewhere; however, as discussed above, this scenario is speculative and does not require evaluation in the Draft EIR.

- 10-4 The comment raises questions related to fair-share funding for solid waste service and odor impacts. Section 4.15 of the Draft EIR, "Utilities," evaluated impacts of the project related to solid waste service capacity and determined that implementing the proposed project would result in less-than-significant impacts, both at the individual project level and at the cumulative level. See response to comment 10-3 for more detail. See Master Response 4: Odors regarding payment of fair-share fees to address odor impacts.
- 10-5 The comment takes issue with the Draft EIR's characterization of significance thresholds related to odors. See Master Response 4: Odors regarding the use of thresholds of significance for the odor impact analysis in the Draft EIR and mitigation measures proposed to reduce significant impacts.
- 10-6 The comment states that the Impact 4.15-11 must be revised to include enforceable mitigation measures, to reduce potential odor impacts that would be directly caused by the reduced landfill buffer zone. This issue is addressed in Master Response 4: Odors.
- 10-7 The comment identifies mitigation measures that the comment suggests would reduce odor-related impacts associated with the WRS. See Master Response 4: Odors regarding mitigation measures for odor impacts and potential WRS operational impacts.
- 10-8 The comment states that the Draft EIR should have analyzed an alternative in which the landfill buffer remained in place, with development intensities revised to account for the existing landfill buffer. See Master Response 1: Alternatives Analysis for a general discussion regarding the adequacy of the Draft EIR's alternatives analysis. Master Response 2: Citizen-Initiated Smart Growth Plan describes the constraints related to an alternative design that maintains the 1-mile landfill buffer. As described in the master response, the 1-mile buffer around the centrally located WPWMA property, excludes the entire center of the SAP area, leaving only the corners and edges for development of sensitive land uses (including the Sac State-Placer Center, other schools, and residential land uses). Much of the land in these areas is currently developed with industrial and warehouse uses. In essence, the resulting alternative would closely resemble the 1997 SIA Plan, which is already included in the Draft EIR's alternatives analysis as the No Project Alternative.
- 10-9 The comment suggests that the locations of pipes noted in Figure 4.15-4 and the recycled water pipeline identified in Figure 7 in Appendix B to the Draft EIR are not correct. To clarify, there is no Figure 4.15-4 in the Draft EIR. It is assumed the commenter is referencing Exhibit 4.15-4, Sunset Area Potable Water System. Exhibit 4.15-4 shows a highly conceptual diagram depicting pipeline diameter and general alignment locations to serve proposed development in the SAP area. Potential pipeline alignments were based primarily on existing rights-of-way, and in the absence of rights-of-way, on existing property lines. Within the net SAP area, more specific public rights of ways would be determined at the specific-plan or site-plan stage when those subsequent developments are proposed, and the pipeline alignments would be developed to coincide with those locations.