

2.7 RESPONSES TO WRITTEN COMMENT LETTERS

The following is a compilation of all letters received by the County during the public comment period. Each letter has been considered by the County and addressed, according to CEQA Guidelines Section 15088.

2.7.1 LETTER I1

Letter I11

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 10:09 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Derek Anderson
Email Address (Optional)	oldharleyjunk@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I11-1 Comments	I support the proposed trail expansions! I live in Placerville and ride singletrack several times a week. This expansion would be a nice addition, as well as reduce crowding on existing trails
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I1: JASON ABRAHAM

Response to Comment I1-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.2 LETTER I2

Letter I2

Date: May 19, 2020

To: Community Development Resource Agency, Placer County Board of Supervisors,
Planning Commission, and Parks Division

From: Linda and Lawrence Adams, 6304 Crater Lake Drive, Roseville, CA 95678

Regarding: Hidden Falls Regional Park Trails Expansion DSEIR

I2-1

We have lived in Placer County since 2002. From the time we moved here, there have been parks and recreation facilities promised in cities and neighborhoods. A proposed park near us has just started development after being "imminent" since 2005, fifteen years. Many others are still waiting for long promised recreation facility development. Although the cost of the Hidden Falls Trails Expansion (HFTE) has not been determined, it has to be significant. Funds used for this single, large project will necessarily take funds from other Placer projects. Concentrating these funds unfairly disadvantages people who live and pay taxes in other parts of our county. Funding should be reasonably distributed to develop projects benefiting a wide range of neighborhoods.

The fact that cost for HFTE has not been determined is another red flag. There is no way to accurately determine return on investment when we don't know the investment. We cannot determine the projects that won't be funded due to money going to HFTE when we don't know the level of funding. It seems grossly inappropriate to even consider HFTE without such a basic piece of information in place as project cost.

Given the neglectful impact to communities not included in the planning and the lack of cost information, I request that you reject the Hidden Falls Regional Park Trails Expansion project.

Please include our letter as part of the public comment permanent record.

Thank you,

Linda and Lawrence Adams

RESPONSE TO COMMENT LETTER I2: LINDA AND LAWRENCE ADAMS

Response to Comment I2-1

The commenter asks a question regarding funding for the project.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Note that no funds belonging to the Cities of Roseville or Rocklin have been used in the development or operation of the existing Hidden Falls Regional Park, and none are proposed for use in the Trails Expansion Project.

2.7.3 LETTER I3

Letter I3

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 10:59 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name Alex Alcaine

Email Address (Optional) alex.alcaine1@gmail.com

Agenda Item (Optional) Hidden Falls Trail Expansion Project

I3-1 | Comments I support the Hidden Falls trail expansion project because it will allow people to increase their ability to social distance on the expanded trails throughout the park as well as provide additional parking capacity and recreational opportunities for both hiking and biking. This is important growth for a beautiful nature area that will benefit future generations as well as current. Please APPROVE this project. Thank you!

Alex Alcaine
Granite Bay, CA

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I3: ALEX ALCAINE

Response to Comment I3-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.4 LETTER I4

Letter I4

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 7:54 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	David Allen
Email Address (Optional)	dmallen100@yahoo.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I4-1 Comments	I support the Hidden Falls Trail Expansion Project because Hidden Falls has captured the attention of so many Placer County residents who enjoy its trails. We need to expand it so more can enjoy its beauty.
Attach a document	Field not completed.

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I4: DAVID ALLEN

Response to Comment I4-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.5 LETTER 15

RECEIVED

MAR 20 2020

March 17, 2020

Letter 15

DDPA I object to the Hidden Falls expansion because:

15-1

- ① Fires
- ② Huge increase in traffic - including speeders and accidents
- ③ Will have to redevelop roads
- ④ Accidents on roads and trails - puts strain on EMT's
- ⑤ Home breakins
- ⑥ Noise, garbage (urine, feces, needles)

I know of this as I have lived on Mount Vernon Rd since 1965.

You will be destroying some of our rural areas of Placer County.

Juan Alexander
9530 Mount Vernon Rd
Oakhorn, CA
95603

RESPONSE TO COMMENT LETTER I5: FRAN ALLENDER

Response to Comment I5-1

The commenter expresses various concerns related to wildfire, traffic, road safety, crime, noise and litter.

Please see the Draft SEIR Section 8.4 “Impacts” for an analysis of transportation and circulation impacts, Section 10.4.3 for an analysis of potential noise impacts and Section 16.4 “Impacts” for an analysis of wildfire impacts.

Please also see Master Response 2 – Wildfire, Safety, and Emergency Response, Master Response 3 – Traffic, Circulation, and Parking, and Master Response 4 – Land Use Compatibility.

The commenter states that the proposed project will destroy more of the rural areas of Placer County. This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the project, nor does it substantiate or support the claims of significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

2.7.6 LETTER I6

Letter I6

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 10:26 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	Nick Almond
Email Address (Optional)	almondnick83@yahoo.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I6-1 Comments	As more and more people discover our regions incredible trail networks and benefit from the health and wellness they provide, we need expanded access to prevent overcrowding and negatively impacting these vital resources.
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I6: NICK ALMOND

Response to Comment I6-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.7 LETTER 17

RESPONSE TO COMMENT LETTER I7: KELLY ALTENA

Response to Comment I7-1

The commenter requests that the public meeting on May 14, 2020 be postponed.

Please see Master Response 1 – Public Comment Process.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

2.7.8 LETTER I8

Letter I8

Date: May 18, 2020

To: Community Development Resource Agency, Placer County Board of Supervisors,
Planning Commission, and Parks Division

From: David and Kelly Altena, 10400 Hubbard Rd., Auburn, CA 95602

Regarding: Hidden Falls Regional Park Trails Expansion SDEIR

As residents of North Auburn and members of *Protect Rural Placer*, we are writing to you today to refute the above referenced document. This SDEIR, as with the previous HFRP EIR, makes weak assumptions and does not take into consideration the full impact that this project will have upon the residents, roads, environment, habitat, agriculture, and fire danger of the nearby community. Specific issues raised are:

Wildfire:

I8-1

- The SDEIR fails to address the link between the number of visitors and the possibility of fire ignitions caused by human beings.
- There is no fire evacuation plan for the residents on these roads (Garden Bar, Lone Star, Cramer and Bell). With the increased traffic to this area (1173 additional vehicles on a single weekend day), it could be disastrous in the event of a fire with potential high loss of life. There are approximately 6000 residences in the HFRP and Trails Expansion area.
- The SDEIR does not address or define "red flag" conditions, PG&E power safety shut offs and plans for closing the park during high fire danger days/red flag days.

Transportation and Circulation:

Regarding the following roads: Bell, Cramer, Lone Star & Garden Bar:

I8-2

- There are over 70 driveways and off shoot roads which have dangerous entrances/exits. **** We have personal experience with this as we live on an off-shoot road with a dangerous entrance/exit.**** and we drive these roads very regularly.
- The roads this project impacts (Garden Bar, Lone Star, Cramer and Bell) are narrow, are full of blind curves with limited visibility.
- The SDEIR estimates 1173 additional vehicles travelling on Bell, Cramer, and Lone Star on a single weekend day. The increase in traffic on these roads will substantially increase the danger on these roads.
- There are many blind rolling hills on these roads and the increase in traffic, both vehicular and bicycle, could be devastating to life safety.

I8-3

Based upon the information in the SDEIR, the assumptions it has made, and the negative impacts to the very communities who were not included in any of the 15-year planning, we request that you reject this project.

Please include our letter as part of the public comment permanent record.

Thank you,

David and Kelly Altena
10400 Hubbard Road
Auburn, CA 95602

RESPONSE TO COMMENT LETTER I8: DAVID AND KELLY ALTENA

Response to Comment I8-1

The commenter expresses concerns about wildfire and evacuation.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I8-2

The commenter expresses concerns about traffic and roadway safety.

Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I8-3

The commenter request that the project be rejected.

The request is noted and will be forwarded to the decision-makers for their consideration. The County will make a decision regarding the project in light of the full record. Thank you for your participation in the environmental review process.

2.7.9 LETTER I9

Letter I9

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 5:18 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	Marila Alvares
Email Address (Optional)	marila_alvares@yahoo.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I support the Hidden Falls Trail Expansion Project because I believe more access to the outdoors is always a worthwhile investment. Hidden Falls is a perfect example of all users groups sharing a common space in a positive way. Hikers, equestrians and mountain bikers cohabitate with few conflicts, but Hidden Falls is a very heavily used trail system. Expanding the existing system with more parking and access would be a great improvement. Thank you, Marila Alvares Sacramento
Attach a document	<i>Field not completed.</i>

I9-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I9: MARILA ALVARES

Response to Comment I9-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.10 LETTER I10

Letter I10

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 9:58 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name Kimberley Alvarez

Email Address (Optional) Kimberleyalvarez@hotmail.com

Agenda Item (Optional) Hidden Falls Expansion

I10-1

Comments I fully support the HiddenFalls trail expansion program! One of the hallmarks of Auburn is it's commitment to outdoor activities for the whole family. Increased parking and trails systems allows more room for both residents and visitors to enjoy our beautiful city. This also promotes increased value in home values and residual business revenue for our local restaurants and small business before and after uses of our wonderful trail systems.

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I10: KIMBERLEY ALVAREZ

Response to Comment I10-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.11 LETTER I11

Letter I11

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 10:09 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	Derek Anderson
Email Address (Optional)	oldharleyjunk@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I1-1 Comments	I support the proposed trail expansions! I live in Placerville and ride singletrack several times a week. This expansion would be a nice addition, as well as reduce crowding on existing trails
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I11: DEREK ANDERSON

Response to Comment I11-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.12 LETTER I12

Letter I12

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:41 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	Matt Anselmino
Email Address (Optional)	skiandbiketahoe@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I12-1 Comments	I support the Hidden Falls Trail Expansion Project because it is a great place to go with my family. I am hoping that we are able to expand parking and access so more people have access and people are able to spread out. Thank you Matt Anselmino Orangevale Ca
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I12: MATT ANSELMINO

Response to Comment I12-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.13 LETTER I13

Letter I13

Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, Ca. 95603

RECEIVED
MAY 08 2020
CDRA

RE: Response to Hidden Falls trail expansion DSEIR, supporting a full buildout options in concert with the Placer Land Trust and their conservation requirements.

Dear Planning Commission,

I support the Hidden Falls Trail expansion project.

I support the full buildout option, including 30 miles of trails, three additional parking areas, including horse trailer parking and other park and safety amenities as discussed in the DSEIR.

I13-1

Issues with traffic for the most part are less than significant and can be mitigated. The two intersections on Highway 49 were shown to be significant. However, these intersections will be improved over time whether or not Hidden Falls is expanded. The DSEIR adequately addressed the concerns about wildfire as being less than significant.

Hidden Falls trail expansion is a great and much-needed project. It provides preservation of open space and rangeland that will be maintained and accessible to the public for healthy outdoor recreation in perpetuity and fulfills "Placers Legacy."

The full buildout option should be the only option, no alternatives, with the understanding that Placer Land Trust will work with Placer County to ensure that trail design, and construction are compatible with conservation objectives.

Sincerely,



RESPONSE TO COMMENT LETTER I13: CINDY ARGENTO

Response to Comment I13-1

The commenter expresses support for the full build-out of the project.

The support is noted. No further response is required.

2.7.14 LETTER I14

Letter I14

From: Teri Ivaldi
Sent: Wednesday, April 22, 2020 11:07 AM
To: 'John Arrabit' <jarrabit@hotmail.com>
Subject: Email fr John Arrabit re Thank You!

Hello Mr. Arrabit,
Thank you for your comments. I will be sure to share your email with the Supervisor Uhler and the other Board members as well.

Take care,
Teri

Teri Ivaldi, Chief of Staff
Placer County Board of Supervisors
175 Fulweiler Ave. Auburn CA
530-889-4010
tivaldi@placer.ca.gov

From: John Arrabit <jarrabit@hotmail.com>
Sent: Wednesday, April 22, 2020 10:23 AM
To: Teri Ivaldi <tivaldi@placer.ca.gov>
Subject: Thank You!

Teri,

I14-1

Just a quick shout out to show my appreciation for Supervisor Uhler's Board comments yesterday. Just before I saw the Facebook post I was discussing the topic with my wife. I told her I was considering contacting the board of Sups to inquire if they understood this shotgun approach to mitigating the COVID 19 pandemic will do more damage than the disease itself. Placer County is not NY, LA or SF. I think we are at a point in time when implementing a laser approach will be in the best interest of all Placer County residents. We can adjust as needed. After viewing Supervisor Uhler's comments on a Facebook post I was reassured we have someone in a leadership position who is passionate and has a common sense approach. He addressed darn near everything I was thinking. Well done! It's good to know there is someone in a leadership position who "gets it" and is advocating for us.

I am a retired California Highway Patrol commander after serving 30 years with the Department. My wife and I followed our entrepreneurial spirit 8 years ago by starting our first of three very successful fitness clubs located in Placer and Nevada Counties. Our success has also afforded me the opportunity to purchase two of the three commercial buildings in which we operate our businesses. We take pride in being a part of our members fitness journeys, and changing their lives along the way. We truly believe Fitness IS Medicine. We are also very proud to employ 20 amazing people. Although my CHP pension is great, it is not enough to support a monthly payroll of over \$50,000. I have applied for a payroll protection loan...but as you know there have been delays and inadequate funding issues. Further, several of my employees have had great difficulty in navigating the states unemployment system; a few have

I14-1
Cont'd

↑ not seen any EDD money since we closed our doors on March 20th. My wife and I have continued to support those who are in greatest need from our own pockets while they navigate the state's unemployment system nightmare.

I've been around the block a few times. In my personal life as a husband, father and citizen; and my professional life as a cop, combat medic, civilian paramedic, businessman and leader, I have been faced with many serious issues/incidents that required analysis and subsequent action. Each and every time there have been extreme opinions and a recommended responses on both sides of the spectrum. My experience has been the truth and correct course of action usually lies somewhere in the middle.

Although we do not know exactly what our return to normal steps will be, that day is coming. We also do not know how much influence each county will have on establishing guidelines for businesses as they re-open. If counties are given some discretion in determining what is best for their county, I confident Placer County will adopt a thoughtful approach to this process. As a fitness club owner we have always implemented common sense measures in an effort to minimize the transmission of any disease within our clubs. We have always prided ourselves on having the cleanest and most sanitary clubs in the area. Many of our social media reviews comment on the cleanliness of our gyms. In addition to our stringent cleaning standards and schedule, I have also recently ordered medical grade air filters that use ultraviolet light and filtration to kill and remove viruses, mold and other pollutants from the air. We will also be making masks available to our members who want to wear them. Although I am already in the process of taking proactive steps, I anticipate other guidelines and rules to be imposed by our local and state government. It is important for these government rules to be intelligent. After working over 30 years in government...developing intelligent rules was always a challenge. An example of an unintelligent rule I've recently heard tossed around in discussions at the national level about our country's reopening was limiting fitness club capacity to 10 people with no consideration for the building's square footage. Ridiculous...and a typical knee jerk governmental solution. I admit, ten people in a 500 square foot building would be a little tight, while ten people in a 10,000 square foot building would be virtually unnoticed.

Most importantly, American citizens should be given the choice to determine their level of risk. The Stay At Home Order was originally implemented for the purpose of flattening the curve so we did not overwhelm our medical care systems. Not even in NY with over 30% of the nation's COVID 19 cases has anyone died due to not receiving the appropriate level of care. I fear certain local and state level leaders, with good intentions, will now modify our response and overprotect. This is the antithesis of a free society, and the slippery slope government often finds itself sliding down.

Looking forward to Placer County pushing for some common sense middle ground in the very near future. If there is anything I can do to assist in this process please let me know.

Respectfully,

John P. Arrabit
(530) 401-0467

ps. Teri, I was our Departments legislative liaison for a few years working with our state legislature and Gov's office. I learned communicating with the Chiefs of Staff was always the best route to get the Member's or Gov's ear. 😊 Keep up

RESPONSE TO COMMENT LETTER I14: JOHN ARRABIT

Response to Comment I14-1

The commenter provides a perspective on the current COVID-19 pandemic.

This comment is not related to the project. It was included inadvertently in the comments on the project. No response is required.

2.7.15 LETTER I15

Letter I15

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 9:39 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

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First and Last Name	Ashely
Email Address (Optional)	visitjupiter@gmail.com
Agenda Item (Optional)	Hidden Falls Trails
Comments	Please consider approving this, unless there's some severe ecological reason not to. The local trails are so vitally important for many community members, including myself. I'm a mountain biker, which sounds like a hobby, but it's also a self-care and mental-health cornerstone in my lifestyle, and access to great trails is really what makes this place Home in an already alienating and crazy world. Thank you for your consideration.
Attach a document	<i>Field not completed.</i>

I15-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I15: [NO FIRST NAME] ASHELY

Response to Comment I15-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.16 LETTER I16

Letter I16

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 11:04 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	Lincoln Bachman
Email Address (Optional)	bachmanlincoln@yahoo.com
Agenda Item (Optional)	Hidden falls trails
Comments	I just saw a map of the proposed new trails for hidden falls. That sounds great . Trails are very important to myself my family and friends. I love to get out in nature and hike and ride bikes.it helps me stay happy. Please please put more trails for us to enjoy. If you need any help you can email me and I will try to help when I can. Trails are great for everyone I'm sure I can get some friends to help also. Thanks for considering more trails
Attach a document	<i>Field not completed.</i>

I16-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I16: LINCOLN BACHMAN

Response to Comment I16-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.17 LETTER I17

Letter I17

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 8:54 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Scott Ball
Email Address (Optional)	scottgball@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I support the Hidden Falls Trail Expansion Project because it works to complement the richness of outdoor recreation resources that makes this area a great place to live and to visit. The natural landscape in the Auburn area holds incredible potential for enjoyment and healthy recreation like mountain biking, running, and hiking. Increasing the network of available trails means people won't travel to other areas when they get bored of what Auburn holds, and it also makes the Auburn area and Placer County more of a destination for outdoor enthusiasts and athletes, which is directly in line with Placer County's marketing for tourism. In addition to giving trail users more options, a more extensive trail network also works to reduce congestion on individual trails as users are able to spread out. The Hidden Falls Trail Expansion Project would provide huge benefit to our community, and it is for this reason that I support it. - Scott Ball, from Auburn
Attach a document	<i>Field not completed.</i>

I17-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I17: SCOTT BALL

Response to Comment I17-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.18 LETTER I18

Letter I18

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

From: Kathy Barger <kbarger7@yahoo.com>

Sent: Wednesday, April 15, 2020 10:12 AM

To: weygand@placer.ca.gov; Shanti Landon <SLandon@placer.ca.gov>

Cc: Placer County Board of Supervisors <BOS@placer.ca.gov>; Todd Leopold <TLeopold@placer.ca.gov>

Subject: May 14, 2020 hearing

4-15-20

To all the Placer County Supervisors,

Thank you for serving us well during the current COVID19 crisis. I love Placer County where I have lived since 1976.

I18-1 I understand there is a scheduled Hidden Falls Regional Park Expansion Project hearing on May 14, 2020. The public will only be able to participate via online streaming. I am writing to request that the supervisors postpone this meeting until the time the public is allowed to gather safely and participate in person in this meeting. Their actual presence, not virtual live streaming, is vital. This can only happen when this corona virus crisis has resolved itself. According to the experts, this will take many more months, certainly not by May 14, 2020.

Once again I ask that you wisely postpone the May 14, 2020 meeting.

Thank you,
Kathryn Barger
Lincoln, CA.

Sent from my iPad

RESPONSE TO COMMENT LETTER I18: KATHRYN BARGER

Response to Comment I18-1

The commenter requests that the public meeting be postponed.

Please see Master Response 1 – Public Comment Process.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

2.7.19 LETTER I19

Letter I19

May 10, 2020

To: Placer County Resource Development Agency

From: Kathryn Barger
857 Wildomar Lane
Lincoln, CA 95648

RECEIVED
MAY 13 2020
CDRA

Regarding: Hidden Falls Regional Park Trails Expansion SDEIR

I19-1

I have lived in Placer County for 44 years, one year in Roseville, 40 years in Newcastle, and 3 years in Lincoln. I have seen unprecedented growth in these three areas. The cities of Roseville and Lincoln have expanded within their city limits with many new neighborhoods and beautiful city parks. And I was initially very happy with the new park developed at Hidden Falls. But I am writing you to voice my concerns with the county's plan to expand the trails of Hidden Falls and build several new parking lots in rural Placer County. I also object to the fact that the county has been planning this for many years and it is only in the last few years that the public has been informed in an appropriate way.

I wish to focus on the Subsequent Draft Environment Impact Report (SDEIR), specifically with the parking and transportation issues.

I19-2

* You are asking some people who live in the rural areas off Bell Road, Cramer Road, and Lone Star to be prepared for significant increases in the traffic along these narrow roads. You are asking these residents to sacrifice their way of life so that others can travel to these rural areas, park their cars and horse trailers and commune with nature. I have driven these roads many times and it is reckless for the county to intentionally increase traffic on them. There will be increased automobile accidents and increased car emissions that will lower air quality. The SDEIR says this is unavoidable but this is a falsehood.

* The largest proposed parking lot will be off Bell Road and is 70% larger than the current parking lot at Hidden Falls. The SDEIR projects over 1400 people could be using this lot on any given weekend. What happens when this lot gets full and people park out on Bell Road? Don't say that it won't happen because it is already happening on Mears Road when the Hidden Falls lot gets full. Rules are ignored and the local residents are asked to put up with this. Is this fair?

I19-3

* The Taylor Preserve would be accessed with this new Bell Road parking lot. On a weekend with 1400 visitors, the 300 acres of this preserve would be overwhelmed by foot traffic, dogs, horses and bicycles. And in the process the risk of a wildfire would be dangerously high. And the noise pollution for the residents nearby will be very undesirable.

I19-4

* Developing the parking lot off Bell Road will very severely affect the aquatic habitat of Orr Creek. The entrance to the new lot would endanger the environment of the Western Pond turtle. The wildlife of this area will be disrupted and permanently damaged. Our county planners need to address these issues in the SDEIR and stop ignoring environmental degradation. Expansion is always chosen over the environment and this is wrong.

RECEIVED
Letter 119
MAY 13 2016
Cont'd
CDPA

119-5

* Additional environmental damage will occur when the trees along Bell Road will be cut down when widening the road for the proposed turn lane into the parking lot. The rural look and feel of this area will be permanently changed.

119-6

In regards to the expansion of Hidden Falls Regional Park, I would like for the Placer County Resource Development Agency to choose Alternative 1 and maintain the current limitation of public access, with docent-led hikes and educational experiences for small groups. In making your decisions I would like to ask each member of this agency how you would feel if the homes or acreages in your neighborhood were sold to build a parking structure or a parking lot for the increase in traffic for a new park nearby or an expansion to an already developed park. What would you say? Probably, "not in my back yard". Please consider the back yards of all our county residents who would be adversely affected by the Hidden Falls expansion.

Please include my letter as part of the public comment permanent record.
Thank you.

Sincerely,


Kathryn Barger

RESPONSE TO COMMENT LETTER I19: KATHRYN BARGER

Response to Comment I19-1

The commenter provides a perspective on the history of planning for the park.

Please see the Draft SEIR Chapter 3.0, “Project Description,” for a discussion of the history of the proposed project.

Response to Comment I19-2

The commenter expresses concerns about traffic and increased car emissions. The commenter also notes that Twilight Ride parking lot will be 70% larger than the Mears parking lot. This assertion is incorrect. The Mears parking lot has 105 auto spaces, plus 12 equestrian spaces, for a total of 117 parking spaces. Adding in the proposed 25 spaces would provide 142 spaces. Therefore, at full build-out, the Twilight Ride parking lot would have 140 spaces, which is less than the Mears parking lot.

Please see Master Response 3 – Traffic, Circulation, and Parking for additional details regarding traffic and parking. Please also see the analysis for Impact 9-2, Long-Term Regional Emissions of Criteria Air Pollutants and Ozone Precursors Associated with Project Operation.

Response to Comment I19-3

The commenter expresses concerns about potential wildfire and noise impacts.

Please see Master Response 2 – Wildfire, Safety and Emergency Response. Please also see Mitigation Measures 10-1 and S10-2 which together, reduce operational noise to less-than-significant.

Response to Comment I19-4

The commenter expresses concerns about potential impacts on biological resources.

Please see the Draft SEIR Section 12.1.2 “HFRP Mitigation Measures Adopted by the County in 2010” for a discussion of Biological Resources, which includes the following mitigation measure:

Mitigation Measure 12-4: Implement Measures to Protect Foothill Yellow-Legged Frog and Northwestern Pond Turtle. The County and its contractor shall implement the following measures to reduce impacts on foothill yellow-legged frogs and northwestern pond turtles:

- Construction of foot bridges and trails across smaller drainages shall occur when the drainages are dry, to the extent feasible.
- Before any work in Coon Creek, the County shall determine, in consultation with DFG, whether aquatic habitat at work sites would support foothill yellow-legged frog and/or northwestern pond turtle habitat. If no aquatic habitat for foothill yellow-legged frog or northwestern pond turtle habitat occurs at a work site, there would be no impacts on these species and no further mitigation is required.

- If aquatic habitat for foothill yellow-legged frog and/or northwestern pond turtle is present at work sites, the County shall minimize impacts on these species by implementing the following measures:
 - Worker awareness training shall be provided to construction crews working in foothill yellow-legged frog and northwestern pond turtle habitat. At a minimum, the training shall include a description of foothill yellow-legged frog and northwestern pond turtle and their habitats and their importance, general measures that are being implemented to conserve foothill yellow-legged frog and northwestern pond turtle as such measures relate to the project, and the boundaries within which construction activities shall occur.
 - Suitable foothill yellow-legged frog and northwestern pond turtle aquatic habitat shall be surveyed within 2 weeks before the start of construction activities. If northwestern pond turtles or foothill yellow-legged frogs, tadpoles, or eggs are found, they may be moved from the project area only with DFG approval. If neither northwestern pond turtle nor foothill yellow-legged frog is identified, construction may proceed.
 - A qualified biologist holding the appropriate permits shall be present at active work sites until the removal of foothill yellow-legged frog and northwestern pond turtle, instruction of workers, and habitat disturbance have been completed. After this time, the County shall designate a person to monitor on-site compliance with all minimization measures.
 - If any work site will be temporally dewatered by pumping, intakes shall be completely screened with wire mesh not larger than 5 millimeters. Water shall be released downstream at an appropriate rate to maintain downstream flows during construction and in such a manner as to prevent erosion. Dewatering structures shall be removed upon completion of the project.
 - Guidelines shall be implemented to protect water quality and prevent erosion, as outlined in the BMPs in Mitigation Measure 11-1, “Obtain Authorization for Construction Activities with the Central Valley Regional Water Quality Control Board and Implement Erosion and Sediment Control Measures as Required.”

Also, please see the Draft SEIR Section 12.4.4 “Impact Analysis” for a discussion of Biological Resources and the 2019 HFRP Trails Expansion Project Impact Analysis. No further response is required.

Response to Comment I19-5

The commenter expresses concerns regarding tree removal along Bell Road as a result of road widening. However, review of the trees adjacent to Bell Road indicates that there are very few mature trees required for removal along the section of Bell Road that would be widened.

Please see the Draft SEIR 12.4.4 “Impact Analysis” for a discussion of Biological Resources and the 2019 HFRP Trails Expansion Project Impact Analysis, which includes the additional following mitigation measure:

Mitigation Measure S12-7: Protect Oak Woodland Habitat

- Prior to any removal of significant trees (equal to, or greater than, six inches DBH or 10 inches DBH aggregate for multi-trunked trees), the project applicant shall obtain a tree removal permit from Placer County. In conjunction with submittal of a tree removal permit application, the applicant shall submit a site plan showing all protected trees proposed for removal. In accordance with Chapter 12.16.080 of the Placer County Code, the applicant shall comply with any conditions required by the Planning Services Division, which shall include payment of in-lieu fees. In-lieu fees shall be paid into the Placer County Tree Preservation Fund at \$100 per DBH removed or impacted.

In the event the Placer County Conservation Program is adopted prior to submittal of improvement plans for this project, then Mitigation Measure 6-10(a) may be replaced with the PCCP's mitigation fees and conditions on covered activities to address this resource impact and avoidance and minimization measures as set forth in the PCCP implementation document. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP mitigation shall apply only to those species and waters that are covered by the PCCP.

- The Site Plans shall include a note and show placement of Temporary Construction Fencing. The applicant shall install a four-foot-tall, brightly colored (usually yellow or orange), synthetic mesh material fence (or an equivalent approved by the Development Review Committee) at the following locations prior to any construction equipment being moved on-site or any construction activities taking place:
 1. Adjacent to any and all open space preserve areas that are within 50 feet of any proposed construction activity;
 2. At the limits of construction, outside the critical root zone of all trees six (6) inches DBH (diameter at breast height), or 10 inches DBH aggregate for multi-trunk trees, within 50 feet of any grading, road improvements, underground utilities, or other development activity; or,
 3. C. Around any and all "special protection" areas such as open space parcels and wetland features.

No further response is required.

Response to Comment I19-6

The commenter expresses support for Alternative 1 (the "No Project" Alternative).

The commenters preference is noted. No further response is required.

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 11:20 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Jeff Barker

Email Address (Optional) jeff-on-trails@comcast.net

Agenda Item (Optional) Hidden Falls Trail Expansion Project

Comments

I fully support the expansion of trails and recreation at Hidden Falls (and surrounding properties) and beg of you to approve all components of it. As the population in Placer County and surrounding foothills continues to grow and grow, and as more and more people discover the physical and mental health benefits of trails (especially during this Covid-19 time!), we are seeing ZERO trail growth in Auburn SRA, Folsom Lake SRA and in BLM-Mother Lode District. Trails are getting crowded and having upwards of 30 more miles of trails would be great for everyone. It will help disperse the trail users and

I, along with about 50 high school kids helped build a couple miles of those trails at Taylor Ranch Preserve about 5 years ago. I have not been able to enjoy the work we did, and all those kids are now in or graduated from college. Why haven't we been able to enjoy these trails? Simple answer: NIMBYISM. This land is not intended to be the private backyard for a couple dozen residents who live adjacent to Hidden Falls. Yes, parking can be worked out... Placer County has done an excellent job improving the initial problems at Hidden Falls proper. They can do the same with the expansion.

Note: I and none of those 50 kids live in Placer County, but having a great trail system helps draw people like me to Placer County to enjoy the trails and spend money at nearby restaurants, gas stations, brew pubs, etc. Trails are an economic driver for rural communities.

I20-1



I20-1
Cont'd ↑

Please don't push this down the road another year or 10. Let's get it going now!

Thank you for taking my comment to heart.

Attach a document

[2015 cycling development team worked hard taylor ranch.jpg](#)

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I20: JEFF BARKER

Response to Comment I20-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Shirlee Herrington

From: Ginny Barnes <ginnyb4u@gmail.com>
Sent: Thursday, May 14, 2020 3:20 PM
To: Placer County Environmental Coordination Services; Placer County Board of Supervisors; Sue Colbert
Subject: [EXTERNAL] Hidden Falls Regional Park Trails Expansion SDEIR

As long time residents of North Auburn I am writing this to disapprove the SDEIR report. It seems the real problems are being over looked and only the good is seen. Many of these problems definitely out weight the good.

- I21-1 * First and foremost to all of us is the potential for fires. There is no immediate access behind our property and since there is only one exit from the park.it would be impossible for everyone to evacuate. The fire could spread so fast we wouldn't even have time to evacuate not to mention losing our home and pets. With that many visitors and pick nickers it wouldn't take much to start a fire.
- I21-2 * Transportation is another major problem. Our roads are narrow with deep ditches, blind curves, blind hills, and people are always driving over the yellow center line, speed is another factor, no one slows down. there is no possible way these roads could handle more traffic. Left and right turn lanes would have to be put in to enter the park but no one has been notified about taking more property for that.
- I21-3 * Traffic is already noisy but add to that all the traffic and noise, from the pick nickers, parties, and loud music. We will never again have our quiet peaceful and private environment we so much enjoy living in our rural area.
- I21-4 * We are all on wells and are concerned about losing our water from the amount of water it will take to supply the park.
- I21-5 * There are people in the immediate area making a living from their property. The park would drastically change that and those who have made their living here for years can't just pack up and move.
- I21-6 * Where there are a lot of people there is a lot of trash which would need to be maintained daily.
- I21-7 * There is also the subject of vandalism, transients, homeless These things are happening at the Mears entrance so we can't see that they would be any different here.

We're asking you to please consider all of these concerns before any final decisions are made.

Thank you,
John, Ginny, Tim Barnes
5355 Bell Road
Auburn, 95602

RESPONSE TO COMMENT LETTER I21: GINNY BARNES

Response to Comment I21-1

The commenter expresses concerns about wildfire risks and evacuation.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I21-2

The commenter expresses concerns about traffic and road safety.

Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0, “Transportation and Circulation,” for a discussion of transportation and circulation impacts analysis.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I21-3

The commenter expresses concerns about traffic and noise.

Please see the Draft SEIR Section 10.4 “Impacts” in Chapter 10.0 “Noise” for the noise impact analysis. Please also see Section 10.5 “Mitigation Measures”, which include the following mitigation measures:

Mitigation Measure 10-1: Restrict General Public Traffic to 6 a.m. to 30 Minutes after Sunset.

The County shall restrict all long-term general public traffic to 6 a.m. to 30 minutes after sunset by ensuring that the expansion area parking gates are closed and locked outside of these times. With implementation of Mitigation Measure 10-1, traffic noise level increases on Garden Bar Road North would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure S10-2, would reduce Impact 10-3 to a less-than-significant level.

Mitigation Measure S10-2: Use of pavement or similar hard material is required when laying the final surface on access roads and limit vehicle speeds to 25 mph.

The County shall use paving or similar hard surfacing material when constructing new access roads to reduce tire noise generated from interaction with gravel. Vehicle speeds on the newly constructed access roads shall be limited to 25 mph. With implementation of Mitigation Measure S10-2 traffic noise level increases would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure 10-1, would reduce Impact 10-3 to a less-than-significant level.

In addition, please see Master Response 3 – Traffic, Circulation, and Parking.

No further response is required.

Response to Comment I21-4

The commenter expresses concerns about water supply.

Please see the Draft SEIR Section 13.4 “Impacts” in Chapter 13.0 “Public Services and Utilities” for a discussion of water supply. Construction of public wells at the various parking areas would require a public well permit from the Placer County Environmental Health Division. Public wells require annual monitoring and sampling. No further response is required.

Response to Comment I21-5

The commenter expresses concern that the proposed project would change the ability for people in the immediate area to make a living from their property. The County and Placer Land Trust are committed to management of the Project properties in a manner that supports continued agricultural production. The County has no evidence that businesses in the vicinity have been negatively affected from the existing operation of Hidden Falls Regional Park.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

Response to Comment I21-6

The commenter expresses concerns about solid waste.

Please see the Draft SEIR Section 13.4 “Impacts” in Chapter 13.0 “Public Services and Utilities” for a discussion of solid waste generation. Also, please refer to Master Response 4 – Land Use Compatibility. No further response is required.

Response to Comment I21-7

The commenter expresses concerns about vandalism and public safety.

Please see Master Response 4 – Land Use Compatibility.

Please also see Impact 13-2, (Public Services and Utilities—Increase in Demand for Police Services) in Chapter 13.0 “Public Services and Utilities” of the Draft SEIR. As discussed in Impact 13-2, the potential increase in crime would be addressed through management strategies, including, but not limited to, limiting operating hours to daylight hours only, controlling the number of visitors to the expansion areas on high volume days through the use of parking reservations, and proportionately increasing the number of ranger staff and County Parks maintenance staff on site to match the increase in trail acreage.

Please see Draft SEIR Section 13.4 “Impacts” in Chapter 13.0 “Public Services and Utilities” for a discussion of law enforcement. No further response is required.

2.7.22 LETTER I22

Letter I22

Shirlee Herrington

From: Ginny Barnes <ginnyb4u@gmail.com>
Sent: Tuesday, April 21, 2020 12:17 PM
To: Cindy Gustafson
Subject: Hidden Falls Expansion public hearing

Follow Up Flag: Follow up
Flag Status: Flagged

I22-1 | To All Supervisors,
We have received information,through word of mouth, that once again you are wanting to change the Hidden Falls public hearing from May,14 to a remote hearing.
That would not be possible in our area. We do not have that kind of connection and others around us do not have it either. That simply will not work.
We are simply asking that you reschedule the meeting so we all may have a chance to voice our opinion.
Stay well

John,Ginny&Tim Barnes
Next door to Twilight Ride Property

RESPONSE TO COMMENT LETTER I22: GINNY BARNES

Response to Comment I22-1

The commenter expresses concern about the public comment process.

Please see Master Response 1 – Public Comment Process.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

MAY 3 2020

Letter I23

PLACER COUNTY COMMENTS
DEVELOPMENT RESOURCE AGENT
ENVIRONMENTAL COORDINATION SERVICES
3091 COUNTY CENTER DR, STE 100
AUBURN, CA 95603

RECEIVED
MAY 10 8 31 AM
CDRA

DEAR SIR/MADAM,

AFTER REVIEWING THE EXECUTIVE SUMMARY TRAFFIC ANALYSIS AND THE COMMENTS TO THE NOP, I HAVE THE BELOW LISTED CONCERNS AND QUESTIONS REGARDING THE SEIR ON THE HIDDEN FALLS REGIONAL PARK TRAILS EXPANSION PROJECT.

I23-1

1. ON PAGE 8-10 THE COLLISION ANALYSIS, HOW COME THERE IS NO REPORT ON GARDEN BAR ROAD? WAS IT OMITTED ON PURPOSE?

I23-2

2. ON PAGE 8/15 IT MENTION SPECIAL EVENTS FOR THE GARDEN BAR RD ENTERANCE, WHAT ARE SPECIAL EVENTS? WILL ALCOHOL BE SERVED AT THESE EVENTS? AND IF IT

②

I23-2
Cont'd

IS SERVED, WHO WILL BE RESPONSIBLE FOR MONITORING THE GUEST? THE COUNTY OR THE EVENT SPONSOR?

I23-3

3. ON PAGE 8-18 IT TALKS ABOUT SATURDAY AND WEEKDAY, BUT THERE IS NO MENTION OF SUNDAYS, ARE SUNDAY TRIPS INCLUDED WITH SATURDAY OR WEEKDAY TRIPS?

I23-4

4. ON PAGE 8-22 SEE COMMENT 3 ABOVE

I23-5

5. IN REGARDS TO THE INTERSECTION OF SR 49 AND LONG STAR ROAD ON PAGE 40 IT MENTION IT WILL OPERATE AT LEVEL OF SERVICE D, BUT THE CHART ON PAGE 41 SHOWS THIS INTERSECTION OPERATING AT A LEVEL OF SERVICE A₁ IN THE TRAFFIC ANALYSIS REPORT, WHICH IS CORRECT.

(3)

I23-5
Cont'd

MY CONCERNS ARE ABOUT
OPENING THE GARDEN BAR ROAD
ENTRANCE PRIOR TO HAVING ALL THE
NECESSARY IMPROVEMENTS TO GARDEN
BAR ROAD BEFORE YOU OPEN IT TO
THE PUBLIC. AND, THAT NO SPECIAL
EVENTS BE ALLOWED UNTIL COMPLETION
OF THE IMPROVEMENTS TO GARDEN BAR
ROAD. UNTIL THESE IMPROVEMENTS
ARE COMPLETED NO GROUP OVER
25 PERSONS BE ALLOWED ENTRANCE TO
THE GARDEN BAR RD AND ONLY WITH
A GUIDE TO LEAD THE GROUP.

I23-6

IN THE COMMENT LETTERS THERE
WAS MENTION OF THE POSSIBILITY OF
FIRES BEING STARTED AT THE PROPOSE
NEW ENTRANCES TO HIDDEN FALLS
PARK. I WAS WONDERING HOW MANY
FIRES HAVE OCCURED AT THE MEARS
ROAD ENTRANCE TO THE PARK?

THANK YOU FOR YOUR TIME IS
THIS MATTER.

SINCERELY

Zoe Burt

LEO BASTON

P.O. BOX 413, SHERIDAN, CA 95681

RESPONSE TO COMMENT LETTER I23: LEE BASTIAN

Response to Comment I23-1

The commenter asks a question about collision data for Garden Bar Road.

Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I23-2

The commenter asks questions about special events at the Garden Bar Road area, and specifically whether alcohol would be served and if events would be monitored.

Please see the Draft SEIR Chapter 3.0 “Project Description” for information on the proposed special events; page 3-26 states the following with regards to Garden Bar Road:

“Phase 1C would allow usage of the 30 parking spaces plus the ability to concurrently accommodate a 200-person special event. All special events in this category would be required to apply for and be granted a Special Event Permit Application (SEPA) through Placer County Parks. These permits analyze traffic control measures, noise, water, garbage and restroom needs and are routed through various County departments, as well as the Sheriff’s Office, Fire Department and California Highway Patrol as applicable. Special Events would be limited to 6 (six) days per year. Permanent restrooms and septic system plus a public well would be constructed with this phase. If sufficient water for a public well is not available, vault toilets may be constructed in lieu of flush toilets.”

Special events could include track meets, boy scout events, nature education classes, etc. as defined in Placer County’s SEPA process. While alcohol is not specifically prohibited by the SEPA process, the type of events anticipated are not typically associated with alcohol consumption. No further response is required.

Response to Comment I23-3

The commenter notes that there is no mention of Sunday trips on pages 8-18 and 8-22 of the Draft SEIR and asks whether Sunday trips are included with Saturday or weekday trips.

Background traffic volumes levels on Sundays are typically lower than those occurring on Saturdays, and Placer County indicates that HFRP use is less on Sundays as well. Thus, Saturday volumes represent the “worst case” weekend condition. However, the County reservation system is expected to be in effect on both days as needed.

Response to Comment I23-4

The commenter has a question about Level of Service at Intersection of SR 49 and Lone Star Road.

The comment refers to the overall Level of Service for the segment of Lone Star Road between Bell Road, which was determined to be LOS A, and the overall Level of Service at the SR 59 / Lone Star Road intersection, which was determined to be LOS D. The two Levels of Service are mutually exclusive because the measurements address different facilities, and the results noted in the Draft SEIR are correct.

Response to Comment I23-5

The commenter has concerns about traffic and road improvements.

Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I23-6

The commenter has concerns about wildfires and wants to know how many fires have occurred at the Mears Road entrance. There have been no wildfires within the Hidden Falls Regional Park property since its purchase by the County in 2003. There was one known small fire in the parking lot that never expanded beyond the bounds of the pavement.

Please see the Draft SEIR 16.4 Impacts for a discussion of Wildfire impacts analysis.

Please also see Master Response 2 – Wildfire, Safety, and Emergency Response.

2.7.24 LETTER I24

Letter I24

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:39 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Todd Beasley
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls expansion
I24-1 Comments	The purposed Hidden Falls trail expansion is a much needed/overdue one for our local and outreaching communities. Providing authorized trails for mixed use is what the "Endurance Capitol of the World" should have.
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I24: TODD BEASLEY

Response to Comment I24-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.25 LETTER I25

Letter I25

Bell Road Access For Hidden Falls Recreation Area

May 17, 2020

To: Community Development Resource Agency
Placer County Board of Supervisors

Regarding: Hidden Falls Regional Park Trails Expansion SDEIR

From: William & June Beatty
10745 Cramer Rd.
Auburn, CA. 95602-9230

To Whom it may concern;

As a longtime resident of North Auburn and member of Protect Rural Placer. We purchased our home in 2001. We are writing to you today because we wish to refute the above referenced document. It is our view that this document (SDIER), like the previous document (HFRP EIR) is detrimental to our way of life. They make assumptions based on weak evidence. While not taking into consideration the FULL IMPACT this project will have on our rural residences. Firstly the roads will deteriorate exponentially, increasing the cost of maintenance. Our peaceful existence along with the wildlife would be greatly influenced (Not In A Good/Healthy Way). Now I shouldn't have to say this but the increase of Fire Danger will also increase dramatically. Here are a list of the specific issues we feel would be detrimental to our wonderful way of life:

I25-1

1. A. Wildfire: As we all know the risk of wildfires increase every year. And along with global warming, people's inconsideration or ignorance seems to increase with it. I would really hate to lose my home or one of the homes nearby. Just because someone was too lazy to empty their ashtray and decided to throw their cigarette out the window into dry grass.

B. Of course even if a new Fire station for this area were built. There are just too many back fields not accessible by roads. Thus allowing a wildfire to have spread substantially before crews can arrive. That includes the air crews.

I25-1
Cont'd

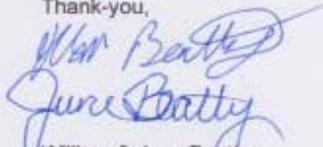
2. Transportation & Circulation: I don't think it really needs saying but there are already too many fatal accidents on HWY 49. The planned changes to 49 are only going to make things worse. True the areas where the middle lane barriers will be improved, maybe! But going into a traffic circle at 45mph, 50mph, 60mph is just an accident waiting to happen. I realize that those figures are not what you have considered as the speed. But by merely slowing down to reach these traffic circles, creates another problem. Even with a special lane for exiting and entering these traffic circles. This will not keep inattentive drivers from hitting the cars in these lanes. Now add to that the increased number of drivers on HWY 49 if the project is approved.

3. Increased Risk to Residents & Wildlife: With the influx of visitors to the rural areas, our wildlife will suffer greatly. Just the risk from garbage alone is enough to re-evaluate this project. Add to that increased noise, property damage, polluted environment & inconsideration of many visitors. Well it just might make it worth our while to move to a different county. But of course we couldn't, could we. No because our property values would increase, but no one would want to buy. Why you ask? Because we buy in the country for safety, peace/quiet, and animals.

Based on the information in the (SDEIR), plus the erroneous assumptions that are made. Adding to that the negative impacts to the very communities who were not included in any of the 15- year planning of this project. I respectfully request that you reject this proposed project.

Please include this letter as part of the Public Comment Permanent Record.

Thank-you,



William & June Beatty
Project Rural Placer

RESPONSE TO COMMENT LETTER I25: WILLIAM & JUNE BEATTY

Response to Comment I25-1

The commenter commented on several topics as noted below:

Wildfire

Please see the Draft SEIR Section 16.4 “Impacts” in Chapter 16.0 “Wildfire” for an analysis of potential wildfire impacts.

Please also see Master Response 2 – Wildfire, Safety, and Emergency Response. The reopening of the Lone Star Fire Station #184 is not a part of the proposed project.

Traffic

The commenter expresses concerns regarding the proposed roundabouts on SR 49. The SR 49 Safety Barrier Project is not part of the propose HFRP Trails Expansion Project. Concerns regarding the roundabouts should be directed to Caltrans District 3. Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0 “Transportation and Circulation” for an analysis of transportation and circulation impacts.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

Noise

Please see the Draft SEIR Section 10.4 “Impacts” in Chapter 10.0 “Noise” for an analysis of noise impacts. Please also see Section 10.5 Mitigation Measures, which include the following:

Mitigation Measure 10-1: Restrict General Public Traffic to 6 a.m. to 30 Minutes after Sunset.

The County shall restrict all long-term general public traffic to 6 a.m. to 30 minutes after sunset by ensuring that the expansion area parking gates are closed and locked outside of these times. With implementation of Mitigation Measure 10-1, traffic noise level increases on Garden Bar Road North would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure S10-2, would reduce Impact 10-3 to a less-than-significant level.

Mitigation Measure S10-2: Use of pavement or similar hard material is required when laying the final surface on access roads and limit vehicle speeds to 25 mph.

The County shall use paving or similar hard surfacing material when constructing new access roads to reduce tire noise generated from interaction with gravel. Vehicle speeds on the newly constructed access roads shall be limited to 25 mph. With implementation of Mitigation Measure S10-2 traffic noise level increases would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure 10-1, would reduce Impact 10-3 to a less-than-significant level.

No further response is required.

Other Concerns

The commenter was not specific about their concerns regarding impacts on wildlife, polluted environment, and land use. Therefore, no further response is required.

The commenter has concerns about loss of property value as a result of the proposed project.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

2.7.26 LETTER I26

Letter I26

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 8:20 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Dan Beever

Email Address (Optional) dbeever@icloud.com

Agenda Item (Optional) Hidden Falls Trail Expansion Project

I26-1

Comments I support the Hidden Falls Trail Expansion Project. It's a great opportunity to add additional options for more outdoor and healthy activities for individuals and families. Hidden Falls has proven to be a popular park. The additional trails and parking will help spread out the crowds to provide a more enjoyable experience for everyone.

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I26: DAN BEEVER

Response to Comment I26-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.27 LETTER I27

Letter I27

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 12:38 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Sandoer Berg
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls Expansion
I27-1 Comments	I just wanted to throw my support behind the proposed Hidden Falls Expansion. We really need more trails for families to explore. This expansion will offer more parking, easier access and miles of excellent trails for our Northern California community. I implore you to allow this expansion to go forward. Thank you!
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I27: SANDOER BERG

Response to Comment I27-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.28 LETTER I28

Letter I28

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 7:25 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Julie bergman
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	<i>Field not completed.</i>
I28-1 Comments	I support hidden trails expansion
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I28: JULIE BERGMAN

Response to Comment I28-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.29 LETTER I29

Letter I29

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 9:10 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Daniel Bergqvist
Email Address (Optional)	berga2000@hotmail.com
Agenda Item (Optional)	Hidden falls expansion
I29-1 Comments	Me and my family are hard working placer / auburn residents and strongly support the expansion of Hidden falls. My 8 and 11y old will have many more memories hiking and biking the new trails
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I29: DANIEL BERGQVIST

Response to Comment I29-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.30 LETTER I30

Letter I30

Randolph & Nancy Bertholf
PO Box 367
Lincoln, CA 95648
916-408-0000

February 27, 2020

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

Subject: Hidden Falls Regional Park Trails Expansion Project (PLN19-00187)

Dear Environmental Coordination Services Division:

I recently received your notice of availability of the Draft SEIR for the Hidden Falls Regional Park Trails Expansion Project (PLN19-00187). In my review of the Draft SEIR and supporting documents I found what I believe to be several errors in Appendix D - Traffic Impact Study prepared by KD Anderson & Associates, Inc. (hereafter KDA) and dated August 1, 2019.

On page 23 KDA states that Godley Road and Wilson Way are private roads that extend north from Mt. Vernon Road. According to my conversation with the County Road Department both Godley Road and Wilson Way are publicly maintained roads and they extend north from Mt Pleasant Road not Mt. Vernon Road. The higher northern portion of these roads may be private but the lower southern portion connected to Mt. Pleasant is a publicly maintained road. Additionally, on page 21 KDA indicates that the posted speed limit on Mt. Pleasant is 40mph; however, the portion of Mt. Pleasant Road in the area of Wilson Way and Godley are currently posted at 45mph.

Additionally, the Draft SEIR retains in the traffic evaluation the 60 privately-owned parking spaces on private lands that were included in the June 4, 2018 Notice of Preparation for the Hidden Falls Regional Park Trails Expansion Project Elements Section, and included in KDA Report, that were subsequently eliminated from the current project. The Draft SEIR indicates on page 8-1 that the extra 60 spaces were retained for consideration in the traffic evaluation because it presents a conservative analysis that

I30-1

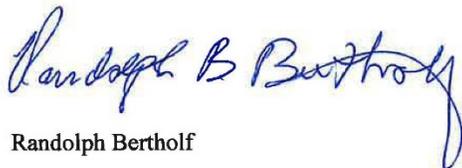
I30-1
Cont'd

↑ considers a circumstance where more trips travel on the roads than under the proposed project. The Draft SEIR should only include circumstances that currently exist, are proposed, or reasonably foreseeable. The inclusion of the 60 privately-owned parking spaces on private lands is a circumstance that is not proposed or reasonably foreseeable. The inclusion of the 60 privately-owned parking spaces appears to be based on no supporting analysis and as stated it presents a conservative analysis that considers a circumstance where more trips travel on the roads than under the proposed project. The traffic study should not consider only the conservative traffic assumptions but should also consider the more likely or higher traffic assumptions and impacts.

As a homeowner on Mt. Pleasant Road I hope your stated traffic impacts are not substantially understated.

I have included a copy of page 21 and 23 of the KDA Report and page 8-1 of the Draft SEIR for your review.

Sincerely,



Randolph Bertholf

Residence: 5286 Mt. Pleasant Road, Lincoln

Physical Characteristics of Project Area Roads

Guidelines and Standards. The physical characteristics of study area roads have been described in terms of existing alignment and width and have been compared to Placer County's standard for roads as part of new construction, as well as guidelines for sight distance and horizontal curves.

A comparison to these standards does not by itself, however, indicate that roadways that do not need the standards for new construction are unsafe nor that the County has plans or funding for major reconstruction to improve rural roadways to meet the current standards.

Placer County's Standard Specifications (2018) / Land Development Manual. Standard specifications include Design Plates that prescribe the configuration roads and intersections. <https://www.placer.ca.gov/DocumentCenter/View/3814/Plates-100-to-127--Roads-PDF> Detail Plate 102 notes that a *Rural Minor Residential* road provides two 12-foot travel lanes. A *Rural Secondary* road has two 16-foot travel lanes. The Land Design Manual <https://www.placer.ca.gov/DocumentCenter/View/3833/Streets-PDF> notes that horizontal curve radii for new construction shall be as specified in the Caltrans Highway Design Manual based on Maximum Comfortable Speed on Horizontal Curves.

Sight Distance. Table 201.1 of the Caltrans Highway Design Manual (HDM) notes minimum stopping sight distance requirements for various speeds. These minimums range from 150 feet at 25 mph, to 200 feet at 30 mph to 360 feet at 45 mph. Placer County Plate 116 notes sight distance requirements for new intersections and driveway that are predicated on HDM Table 405.B Corner Sight Distance Requirements. Plate 116 requirements range from 275 feet at 25 mph to 385 feet at 35 mph and 495 feet at 45 mph.

Curve Radii. The speed at which motorists can negotiate horizontal curves is depended on factors such as the length of radius and the rate of super-elevation. Placer County Land Development Manual makes reference to HDM Table 203.2 "Comfortable Speeds on Horizontal Curves", which has been replaced in the current HCM by Table 202.2 "Maximum Comfortable Speed on Horizontal Curves". This reference suggests that without super-elevation a 30 mph design would justify a 300 foot radius curve, while a 35 mph design would require a 475 foot radius and a 900 foot radius is needed for 45 mph.

Area Roadways. The text which follows describes the general characteristics of area roads.

Mt. Pleasant Road extends for approximately three miles linking Big Ben Road and Mt. Vernon Road. The alignment Mt. Pleasant Road follows the rolling terrain of the foothills west of Auburn. The road itself is 20 to 22 feet wide with graveled shoulders of varying width. The posted speed limit is 40 mph.

Mt. Vernon Road runs easterly from an intersection on Wise Road for about 7 miles into the City of Auburn. Mt. Vernon Road is typically 18-21 feet wide. No Parking signs have been installed in the area of HFRP. The speed limit on Mt Vernon Road is 40 mph.

The following private roads exist in the area around Hidden Falls Regional Park and near the proposed expansion project and would provide access to the new park facilities.

Auburn Valley Road is a private road that extends west from Bell Road to provide access to Auburn Valley Country Club and to an existing residential neighborhood. The paved width of this two-lane road varies from 19 to 22 feet. The alignment of Auburn Valley Road is gently rolling and there are no obvious sight distance limitations. However, the roadway lacks shoulders in what is a developed residential area.

Curtola Ranch Road is a private road that extends north from Auburn Valley Road to a portion of the Harvego Bear River Reserve. The road is paved with a width of 18 to 20 feet for about 700 feet north of Auburn Valley Road. From that point on the roadway is graveled. The width narrows as the road extends northly and is a one-lane facility across a local dam.

The following private roads exist in the area around Hidden Falls Regional Park and near the proposed expansion project. These roads could provide access to new parking facilities on private lands that might be developed exclusive of the actual HFRP facilities, although no proposals for such private parking areas exists today. Further environmental review would be required for any parking on private property.

Godley Road and **Wilson Way** are private roads that extend north from Mt. Vernon Road towards the southern boundary of the existing Hidden Falls Regional Park. Godley Road has an average width of 15 to 18 feet, while Wilson Way is generally 11 to 16 feet wide.

Collision History

Placer County has a robust Traffic Accident Analysis System (TAAS) in which traffic collision data is collected and reviewed on an annual basis. It is recognized that many roadways throughout the County do not conform to current design standards and guidelines; however, the fact that a roadway does not meet current design standards does not necessarily make safety improvements essential. Traffic and roadway engineering design standards and guidelines have evolved over many years; therefore, many roadways that do not display any safety deficiencies no longer meet the current standards simply due to the passage of time since their construction. Conversely, some roadways that meet current standards may display safety deficiencies. The TAAS recognizes that reconstructing all roadways that do not meet current design standards would be financially infeasible, and that doing so would expend funds to upgrade many roadways that operate safely. Through the TAAS program, locations for detailed engineering investigations are identified and improvements to facilitate safe travel for all modes, if necessary, are implemented on a regular basis.

Consistent with the TAAS guidelines, three-years of collision history (January 1, 2014 – December 31, 2016) was obtained for study area roadways. This information was reviewed, and roadway collision rates were calculated based on the number of collisions per Million Vehicle Miles (MVM) of travel. This method permits comparison of roadways carrying different traffic volumes. In addition, reference to average collision rates for various types of facilities is a

KSDA

8.0 TRANSPORTATION AND CIRCULATION

This chapter summarizes the 2010 Hidden Falls Regional Park (HFRP) Certified EIR transportation and circulation findings; describes the existing HFRP and proposed trail network expansion project area (project area) environmental setting (existing roadway network, bikeways, bridges, and parking facilities) and pertinent regulations; evaluates project-related impacts associated with transportation and circulation; and provides mitigation measures as necessary to reduce those impacts. The information and analysis in this section is a summary of the traffic impact study for the proposed project prepared by KD Anderson & Associates, Inc., in August of 2019 contained in Appendix D.

The June 4, 2018 Notice of Preparation for the Hidden Falls Regional Park Trails Expansion Project included in the "Project Elements" section the allowance for a limited number of privately-owned parking areas adjacent to the park boundaries. Subsequent to the preparation of the traffic impact analysis prepared by KD Anderson and Associates, Inc., which included 60 privately-owned parking spaces within the overall traffic calculations, the project description was updated to reflect the elimination of the private parking option. These privately-owned parking areas are therefore not part of the HFRP Trail Expansion Project (see Chapter 3.0, Project Description) evaluated in this SEIR and a refinement of parking numbers is reflected in the other chapters of this SEIR. However, the trip volumes used in the traffic analysis conservatively retain the assumption of 60 spaces on private lands around the entries. In addition, the number of parking spaces proposed at the Garden Bar 40 and Harvego Bear River Preserve access locations have been fine-tuned through the site planning process. The assumption of the extra 60 parking spaces was retained for consideration in the traffic evaluation because it presents a conservative analysis that considers a circumstance where more trips travel on the roads than under the proposed project.

In addition, at the August 14-15, 2019 meeting of the California Transportation Commission (CTC), the SR 49 Safety Improvements Project was approved for inclusion in the 2018 State Highway Operation and Protection Program (SHOPP). The project description states "Near Auburn, from 0.3 mile south of Lorenson Road/Florence Lane to 0.3 mile north of Lone Star Road, construct concrete median barrier and two roundabouts." The programming includes \$26,340,000 in project funding and anticipates construction beginning in 2022. An initial allocation of \$1.5 million in funding for the Project Approval & Environmental Document (PA&ED) phase was also approved as part of the CTC agenda. However, as the project was not fully funded at the time of the Notice of Preparation for the Hidden Falls Regional Park Trails Expansion Project, it was not assumed under cumulative conditions.

Additionally, in late 2018, the Secretary of the Natural Resources Agency promulgated and certified CEQA Guidelines Section 15064.3 to implement Public Resources Code (PRC) Section 21099(b)(2). Public Resources Code Section 21099(b)(2) states that, "upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

In response to PRC 21099(b)(2), CEQA Guidelines Section 15064.3 notes that "Generally, vehicle miles traveled is the most appropriate measure of transportation impacts." The Guidelines section further states that although a lead agency may elect to be governed by this section immediately, lead agencies are not required to utilize VMT as the metric to determine transportation impact until July 1, 2020. The inconsistency between the implementation

RESPONSE TO COMMENT LETTER I30: RANDOLPH BERTHOLF

Response to Comment I30-1

The commenter expresses numerous concerns about traffic and circulation. Please see Master Response 3 - Traffic, Circulation, and Parking.

The Draft SEIR Traffic Study has been corrected as follows.

Godley Road and *Wilson Way* are ~~private-local~~ roads that extend north from Mt. Vernon Road towards the southern boundary of the existing Hidden Falls Regional Park. Godley Road (D7003) is a County Maintained road from Mt. Pleasant Road to the end (1.56 miles) and has an average width of 15 to 18 feet, while Wilson Way (D7002) is a County Maintained road from Mt. Pleasant Road to the end (0.84 miles) and is generally 11 to 16 feet wide.

Information regarding Godley Road and Wilson Way is not a part of the Draft SEIR text, and no changes to the Draft SEIR are required. Errors cited are typographical in nature and have no effect on the analysis or conclusions of the analysis presented in the Draft SEIR.

Mt. Pleasant Road extends for approximately three miles linking Big Ben Road and Mt. Vernon Road. The alignment Mt. Pleasant Road follows the rolling terrain of the foothills west of Auburn. The road itself is 20 to 22 feet wide with graveled shoulders of varying width. The posted speed limit from Crosby Herold Road to Garden Bar Road (S) is 40 mph. The speed limit from Garden Bar Road (S) to Mt. Vernon Road is 45 mph.

Information regarding the speed limit on Mt. Pleasant Road is not a part of the Draft SEIR text, and no change to the Draft SEIR is required. Errors cited are typographical in nature and have no effect on the analysis or conclusions of the analysis presented in the Draft SEIR.

2.7.31 LETTER I31

Letter I31

Shirlee Herrington

From: Erik <tileandsand@gmail.com>
Sent: Monday, February 24, 2020 6:31 AM
To: Placer County Environmental Coordination Services
Subject: Hidden Falls project

I31-1

After fining a abandoned car on Lone Star valley road, I tried to access the traffic survey for the area in your menu on the EIR and was unable to. is that link broken? Residents do not want this project here, I walk my dogs on Lone star road daily and know how dangerous this road is, even after the recent signage and paving Schedule a evening meeting. How is a 15 minute noise survey helpful? Has anyone Walked the roadways affected, Seen the empty bottles of alcohol and trash already thrown out by golfers from Auburn Valley Country Club?

Erik Bewernick

RESPONSE TO COMMENT LETTER I31: ERIK BEWERNICK

Response to Comment I31-1

The commenter expresses concern regarding several issues including noise, traffic, safety, trash, and County meeting. Each of these issues is addressed below.

Noise

Please see Draft SEIR Section 10.4 “Impacts” in Chapter 10.0 “Noise” for a discussion of the noise impacts analysis. Please also see Section 10.5 Mitigation Measures, which include the following:

Mitigation Measure 10-1: Restrict General Public Traffic to 6 a.m. to 30 Minutes after Sunset.

The County shall restrict all long-term general public traffic to 6 a.m. to 30 minutes after sunset by ensuring that the expansion area parking gates are closed and locked outside of these times. With implementation of Mitigation Measure 10-1, traffic noise level increases on Garden Bar Road North would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure S10-2, would reduce Impact 10-3 to a less-than-significant level.

Mitigation Measure S10-2: Use of pavement or similar hard material is required when laying the final surface on access roads and limit vehicle speeds to 25 mph.

The County shall use paving or similar hard surfacing material when constructing new access roads to reduce tire noise generated from interaction with gravel. Vehicle speeds on the newly constructed access roads shall be limited to 25 mph. With implementation of Mitigation Measure S10-2 traffic noise level increases would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure 10-1, would reduce Impact 10-3 to a less-than-significant level.

A short (15 min) noise measurement conducted during a period of representative traffic and use of a site is used to establish a noise “baseline” that reflects typical noise levels. Any increase in noise levels that would result from implementation of a proposed project is then compared against this baseline. This is standard utilized by noise engineers to assess impacts.

Transportation and Circulation

Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0 “Transportation and Circulation” for an analysis of transportation and circulation impacts.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

Public Services and Utilities

Please see the Draft SEIR Section 13.4 “Impacts” in Chapter 13.0 “Public Services and Utilities” for a discussion of solid waste generation. No further response is required.

Please see the Draft SEIR Section 13.4 “Impacts” in Chapter 13.0 “Public Services and Utilities” for a discussion of law enforcement. No further response is required.

Additionally, please see Master Response 4 – Land Use Compatibility for both solid waste and law enforcement comments.

County process (meetings)

Please see Master Response 1 – Public Comment Process.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

Shirlee Herrington

From: Erik <tileandsand@gmail.com>
Sent: Saturday, March 7, 2020 8:57 PM
To: Placer County Environmental Coordination Services
Subject: Re: Hidden Falls project

I32-1

I am writing on behalf of Fred and Faye Bewernick Trustees of 5865 Lone Star Valley Road.

"As noted earlier no funding source has been identified for improvements to the SR 49 corridor north of Dry Creek Road. Placer County could elect to identify a strategy for the overall traffic controls in the area and update its fee program to address the local share of these costs. However, while HFRP could contribute its fair share to the cost of SR 49 corridor improvements by paying adopted fees, Placer County cannot guarantee that funding will be available. As a result, this impact is significant and unavoidable."

Looking at your traffic survey at @ SR 49 is incorrect, Speeds exceed 70+mph and times when two or more vehicles from East bound and West bound of Lone Star Rd are trying to merge onto SR 49 and with vehicles in the North or South bound turn lanes trying to access LoneStar Road from makes for the perfect 140+ mph head on collisions, you have no funding proposed to address speed. It is extremely hazardous when conditions are ideal, I have not seen any study's for inclement weather. The low lying areas that flood on Lone Star Rd, there are 3 where the NID crosses that need to be addressed, There are minimal areas where shoulders exist and most are ditches that exceed 2' in depth, The blind corner that currently exist at the intersection of Lone Star Rd and Lone Star Valley Rd. Daily service of mailboxes put mail carriers and waste management drivers at risk, a prime example is the group of mailboxes for residents of Lone Star Valley Rd that are located on a crest of a hill leading to a blind corner and waste management drivers at risk every stop where a garbage can sits. What do you have planned for this. There are so many driveways hidden behind rock

I32-1
Cont'd

↑
outcroppings, trees, and rolling hills, poorly maintained fences that contain livestock.

I've walked Lone Star Road road from Bell to SR 49 for over 12 years. This road cannot handle the amount of traffic you are going to impose on it. There will be deaths, is this in your plan for recreation?

Sincerely

Erik Bewernick, resident of Lone Star Valley road since 1978

On Wed, Feb 26, 2020 at 2:41 PM Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov> wrote:

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

While the link to Appendix D – Traffic Study appears to be functioning, for your convenience I've attached it here.

Thanks.

Shirlee Herrington
Community Development Technician
Environmental Coordination Services
Placer County Community Development Resource Agency
3091 County Center Drive, Suite 190, Auburn, CA 95603
530-745-3089 fax 530-745-3080

From: Erik <tileandsand@gmail.com>
Sent: Monday, February 24, 2020 6:31 AM
To: Placer County Environmental Coordination Services <CDRAECS@placer.ca.gov>
Subject: Hidden Falls project

After finding an abandoned car on Lone Star valley road, I tried to access the traffic survey for the area in your menu on the EIR and was unable to. Is that link broken? Residents do not want this project here, I walk my dogs on Lone Star road daily and know how dangerous this road is, even after the recent signage and paving. Schedule an evening meeting. How is a 15-minute noise survey helpful? Has anyone walked the roadways affected, seen the empty bottles of alcohol and trash already thrown out by golfers from Auburn Valley Country Club?

Erik Bewernick

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Erik Bewernick

RESPONSE TO COMMENT LETTER I32: ERIK BEWERNICK ON BEHALF OF FRED AND FAYE BEWERNICK

Response to Comment I32-1

The commenters express numerous concerns about funding sources for traffic issues.

The Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

The commenter makes note of three low-lying areas that flood on Lone Star Road where the NID canal crosses the road that need to be addressed. The County Roads Division acknowledges that they have received calls in the past regarding water on the roadway along Lone Star Road at times of extraordinarily heavy rains, when other roads within the County likewise are inundated by increased surface runoff. It should be noted that this is an existing condition, and at times of excessive rain, patronage at the existing park is very low, and visitor use is expected to be similarly low within the Trails Expansion area during extremely rainy periods. The proposed project would not affect the frequency or severity of flooding on the roads. Therefore, no additional measures to address roadway flooding are required as part of the proposed project.

The commenter mentions concerns with road safety along Lone Star Road. Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0 “Transportation and Circulation” for an analysis of transportation and circulation related impacts.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

2.7.33 LETTER I33

Letter I33

Shirlee Herrington

From: Donna Biles <dkbiles@att.net>
Sent: Thursday, February 20, 2020 3:36 PM
To: Placer County Environmental Coordination Services
Subject: Hidden Falls Expansion

I33-1

Thank you for sharing the report. I am sure you can understand my anxiety over having Auburn Valley Road (which is private and that I pay for as part of my association dues) turned into a public thoroughfare for cars/trucks/trailers. Also, Curtola Ranch Road runs directly behind my home on Estates Court and will not only take away my privacy, but will add noise, air pollution and security issues. In addition, my property value is sure to suffer because who wants to back up to a public road. How does the County justify taking all those things from me and my neighbors to put in a parking lot with most people using it not even Placer County resident? I thought the responsibility of county government is protect people's rights against the very intrusions you now have put before us.

Donna Biles
6740 Estates Court
Auburn

RESPONSE TO COMMENT LETTER I33: DONNA BILES

Response to Comment I33-1

The commenter states that Auburn Valley Road is a private road.

Please see Master Response 3 – Traffic, Circulation and Parking.

The commenter expresses concerns about noise, pollution and security at her property.

Please see Master Response 4 – Land Use Compatibility.

The commenter is also concerned about property value suffering due to the proposed project.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382).

No further response is required.

2.7.34 LETTER I34

Letter I34

Date: May 17, 2020

To: Community Development Resource Agency, Placer County Board of Supervisors,
Planning Commission, and Parks Division

From: Donna Biles, 6740 Estates Court, Auburn

Regarding: Hidden Falls Regional Park Trails Expansion DSEIR

As a resident of North Auburn, I am writing to you today to refute the above referenced document. This DSEIR, as with the previous HFRP EIR, makes weak assumptions and does not take into consideration the full impact that this project will have upon the residents, roads, environment, habitat, agriculture, and fire danger of the nearby community. Specific issues raised are:

Wildfire:

There is nothing about how people will act when traveling down these roads. 95% of fires are caused by people and their reckless behavior. Who is going to oversee these new areas and make certain people are following the rules?

There is only one road, Auburn Valley Road, to my house. We are already at high risk to become the next Paradise and adding needless additional traffic and people would create a death trap. Even the SDEIR states that people would be exposed to uncontrolled wildfire from public use.

I34-1

Transportation and Circulation:

I don't even know where to begin because it is so obvious that Lone Star, Bell and Auburn Valley Roads are woefully inadequate and dangerous to support any increase in traffic. Curtola Ranch Road runs directly behind my home and having 500-600 cars would destroy my environment, my property value and greatly increase the fire risk.

Because of COVID-19, all government agencies are experiencing major budget shortfalls. The County should be focused on providing essential services to the public and not yet another park. Given these shortfalls, I can only assume resources will not be dedicated to this development.

Finally, with hundreds of miles of existing trails, why do we need to add more knowing the negative impact this would have to those very people who trusted you to protect them?

Based upon the information in the DSEIR, the assumptions it has made, and the negative impacts to the very communities who were not included in any of the 15-year planning, I request that you reject this project.

Please include my letter as part of the public comment permanent record.

Thank you,

Donna Biles/

RESPONSE TO COMMENT LETTER I34: DONNA BILES

Response to Comment I34-1

The commenter has concerns regarding wildfire, traffic, and land use compatibility.

Wildfire

Please see the Draft SEIR Section 16.4 “Impacts” in Chapter 16.0 “Wildfire” for an analysis of impacts related to wildfire.

Please also see Master Response 2 – Wildfire, Safety, and Emergency Access.

Transportation and Circulation

Please see Draft SEIR Section 8.4 “Impacts” in Chapter 8.0 “Transportation and Circulation” for an analysis of impacts on transportation and circulation.

Please also see Master Response 3 – Traffic, Circulation, and Parking; and Master Response 2 – Wildfire, Safety, and Emergency Response.

Land Use Compatibility

Please see Master Response 4 – Land Use Compatibility.

The commenter also has concerns with the current County budget as a result of COVID-19. The Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

Lastly, the commenter states that the local residents were not included in any of the planning for acquisition of the Trails Expansion properties or for the current Project.

In 2000, the voters of Placer County were presented with a ballot measure to express their desire for the Placer Legacy Open Space and Agricultural Conservation Program (Placer Legacy) through and responded in the affirmative. Placer Legacy established the framework and funding mechanisms for the open space acquisition and outdoor recreational amenities that were brought to fruition through the HFRP and Trails Expansion Project properties. For each of the 11 property acquisitions that make up HFRP and the Trails Expansion Project properties to which the County was a party, beginning in 2003 the actions by the Board of Supervisors were noticed and discussed in public meetings, and the recreational components of each purchase and sale agreement were disclosed (See Appendix B of the Draft SEIR for the public trail descriptions associated with each property). As a development plan proceeded for each property, the County met or exceeded the public outreach guidelines for environmental review for each project including a previous Mitigated Negative Declaration and EIR. In the case of the current Project, the County provided multiple mailed notices to over 6,000 property owners in the vicinity of the Project 7 in 2017 and 2018. There were two Scoping Meetings (in 2017 and 2018) which were both heavily attended by local residents, as evidenced by the Scoping Meeting attendance sheets and speaker sheets. The Project has been discussed in over 40 public meetings since late 2016 (including Scoping Meetings, Municipal Advisory Council meetings throughout western Placer County, Parks Commission, Planning

Commission, Board of Supervisors, and other community groups upon request such as the Greater Auburn Area Fire Safe Council). Notices have been posted on the County web site, and multiple press releases and stories by local media outlets have been broadcast about the Project.

Additionally, the County Parks Division offered to meet with any local residents who wished to discuss the proposed project. Parks staff met on 3 separate occasions with local residents who were interested in meeting with members the Parks Division. In February of 2019, the County invited members of the Protect Rural Placer group to participate in a site visit to the Santa Clara Open Space Authority's Sierra Vista Open Space Preserve to learn how the East Bay area has successfully integrated public use of trails with on-going cattle operations. Additionally, the County met specifically with the Protect Rural Placer group and Supervisor Gore on May 28, 2019 to address the groups' questions and concerns. Lastly, the Notice of Availability for the Draft SEIR was again sent out to over 6,000 homeowners. Over 500 comments were received during the public comment period which included numerous comments from local residents and members of the Protect Rural Placer group.

2.7.35 LETTER I35

Letter I35

Shirlee Herrington

Subject: FW: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

From: noreply@civicplus.com <noreply@civicplus.com>

Sent: Saturday, May 9, 2020 11:26 PM

To: Andrea Dashiell <ADashiel@placer.ca.gov>; Kara Conklin <KConklin@placer.ca.gov>; George Rosasco <GRosasco@placer.ca.gov>

Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Sharon Bitz

Email Address (Optional) Sharonbitz@yahoo.com

Agenda Item (Optional) 30 miles of new trails to Hidden Falls

I35-1 | Comments I am in support to add the extra miles to Hidden Falls.
I am an equestrian and think the park is the most gorgeous park to ride in N. California. I appreciate the trails and how they are maintained and I never take it for granted! Please 🙏

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I35: SHARON BITZ

Response to Comment I35-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.36 LETTER I36

Letter I36

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 4:46 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Jennifer Blake
Email Address (Optional)	chickenqueen@me.com
Agenda Item (Optional)	Hidden Falls Trails expansion
Comments	<p>Dear Board of Supervisors,</p> <p>I am a local Auburn community member and I strongly support the expansion of the Hidden Falls trails. I live about 5 minutes from the Hidden Falls and utilize the trail system often. Placer has done a great job with the reservation system to manage the level of visitors. And the trail maintenance is incredible!</p> <p>These trails are such an asset to our community. These are some of the most beautiful and well maintained trails in the area. By expanding the trail system, we keep this beautiful landscape wild and accessible for everyone to enjoy.</p> <p>Please approve the expansion as a way to preserve our local, natural beauty.</p>
Attach a document	<i>Field not completed.</i>

I36-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I36: JENNIFER BLAKE

Response to Comment I36-1

The commenter expresses support for the project.

The support is noted. No further response is required.

P.C.P.C.,
Environmental Coordination Services
Auburn, Ca.

RECEIVED
MAY 1 2013
CDRA

Re: Hidden Falls expansion DSEIR, Support of full buildout

Dear Planning Commission,

I37-1

my family and I are outdoor enthusiasts and 100% support the full buildout of Hidden Falls. As local Auburn residents we have taken under consideration all of the pros & cons of this endeavor. Without any doubt we feel the pros may outweigh the cons. During this pandemic it is so evident that we all need ways to enjoy the outdoors & breathe the clean air! I know I speak for many but have only one voice. Please enlarge the equestrian parking as it is so limited, allow for only the full buildout. We desperately need more open spaces to hike, bike, ride and ride our horses. I speak for my entire family

Cory Bockenshi
Anne Bockenshi
Colin Easter
Sauron Easter

Jon Blix
Jesa Blix
Joey Bockenshi
Britt Bockenski

And Grand Kids!
♡

RESPONSE TO COMMENT LETTER I37: ANNE BOCHENSKI

Response to Comment I37-1

The commenter expresses support for full build-out of the project as she desires more equestrian parking.

The support is noted. No further response is required.

2.7.38 LETTER I38

Letter I38

Shirlee Herrington

From: Karen Boles <kkboles@yahoo.com>
Sent: Friday, April 17, 2020 11:05 AM
To: Cindy Gustafson
Subject: HFRP Expansion Project Request

Follow Up Flag: Follow up
Flag Status: Flagged

I38-1 | As a resident of Auburn Valley, I am requesting that the May 14th Public Hearing for the HFRP Expansion Project be cancelled or postponed. We deserve to attend this hearing in person, which is impossible until this epidemic is over. I appreciate your support in this difficult time.
| Karen Boles

Sent from my iPhone

RESPONSE TO COMMENT LETTER I38: KAREN BOLES

Response to Comment I38-1

The commenter requests that the public meeting be postponed.

Please see Master Response 1 – Public Comment Process.

2.7.39 LETTER I39

Letter I39

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 3:10 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Aaron Bolshaw
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I and my family of 5 fully support the Hidden Falls Trail Expansion Project. More public access to land like this, when responsibly managed, reduces the overall crowds, gives more trailheads for better options, and benefits healthy, family activities! I'm a Level 3 NICA Mountain Bike coach for the Roseville High School team, and the expansion of the proposed trail near hidden falls regional park would be a great place to ride. Sincerely, Aaron Bolshaw Roseville, CA
Attach a document	<i>Field not completed.</i>

I39-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I39: AARON BOLSHAW

Response to Comment I39-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.40 LETTER I40

Letter I40

Shirlee Herrington

From: noreply@civicplus.com
Sent: Thursday, May 14, 2020 7:20 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Brock Bonnett
Email Address (Optional)	Brockb9q6@gmail.com
Agenda Item (Optional)	Expansion of hidden falls park
I40-1 Comments	Hey guys lets make this happen, the trails we offer are known worldwide. People love it, they get people doing something positive for themself and the community. Thanks
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I40: BROCK BONNETT

Response to Comment I40-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.41 LETTER I41

Letter I41

Shirlee Herrington

From: Tom Boucree <tjboucree@wavecable.com>
Sent: Friday, May 15, 2020 5:45 PM
To: Placer County Environmental Coordination Services
Subject: [EXTERNAL] Hidden falls expansion

Dear planning commission

I41-1

I would like to voice my recommendation for expansion of the park. Placer county is growing rapidly and we have very limited parks. The parks we do have are heavily used. I think expansion would ensure the rural atmosphere of the area as opposed to ruining the beauty with more building of private and commercial use, which would eventually happen. The expansion of the area could be well monitored to ensure safety. Wildlife could be protected and have the area to roam.

Hiking and horseback riding on trails is wonderful. A different access point would be reasonable.

Please expand hidden falls and USE it for good!

Thank you
Judy Boucree

Sent from my iPad

RESPONSE TO COMMENT LETTER I41: TOM BOUCREE

Response to Comment I41-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.42 LETTER I42

Letter I42

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 19, 2020 2:03 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	John Brainard
Email Address (Optional)	brainardej@gmail.com
Agenda Item (Optional)	"Hidden Falls Trail Expansion Project"
Comments	"I support the Hidden Falls Trail Expansion Project as this is a wonderful way to promote healthy visitation to the county, have others invest time and volunteerism into maintaining the trails, which also brings people's dollars to invest and spend in the county businesses. Added parking, and trailhead access will spread out crowds, provide variety to visitors and provide healthy activities or family activities that benefit the visitors as well as the local populous... Mountain bike trail development has proven to bring significant positives to the areas developed. A case study is the development of MTB infrastructure in Arkansas by the Sam Walton grandsons... Millions of dollars developed in a virtually non-existent region. Now it's a MTB resort!"
Attach a document	<i>Field not completed.</i>

I42-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I42: JOHN BRAINARD

Response to Comment I42-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.43 LETTER I43

Letter I43

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 1:40 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Nina Brandt
Email Address (Optional)	brandt.ninja@gmail.com
Agenda Item (Optional)	"Hidden Falls Trail Expansion Project"
I43-1 Comments	I support the Hidden Falls Trail Expansion Project because it would allow for more usable trails for all user groups and allow for less traffic on each individual trail. That will allow for healthy activity options that benefit everyone without overcrowding (especially in these virus times). Nina Brandt, Sacramento
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I43: NINA BRANDT

Response to Comment I43-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.44 LETTER I44

Letter I44

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 3:40 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Amber Briney
Email Address (Optional)	Ajbriney@yahoo.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I 100% support the expansion of these trails and putting money into projects that lead to healthy kids and families. I can't see a better way to do that than to create more healthy outdoors spaces for families to gather and participate in healthy activities. The trails in this area get used. That should be a testament to what the constituents want to financially support.
Attach a document	<i>Field not completed.</i>

I44-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I44: AMBER BRINEY

Response to Comment I44-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.45 LETTER I45

Letter I45

Shirlee Herrington

From: noreply@civicplus.com
Sent: Thursday, May 14, 2020 8:46 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	David Briney
Email Address (Optional)	dbriney@teichert.com
Agenda Item (Optional)	Hidden Falls Trails Expansion
Comments	I am a resident of Auburn and totally enjoy our hidden gem- Hidden Falls- I am completely in support of the opportunity to expand this faculty! I vote YES!!!
Attach a document	<i>Field not completed.</i>

I45-1

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RESPONSE TO COMMENT LETTER I45: DAVID BRINEY

Response to Comment I45-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.46 LETTER I46

Letter I46

Shirlee Herrington

From: noreply@civicplus.com
Sent: Thursday, May 14, 2020 7:16 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Dominic Brissey
Email Address (Optional)	pebrissey@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expasnsion
Comments	Agenda Item: "Hidden Falls Trail Expansion Project" I support the Hidden Falls Trail Expansion Project. More parking, more trailheads, spread out crowds, activities and family activities benefit everyone. Getting outdoors and exercising is an essential part of many people's health and wellness. I strongly urge you to approve this expansion of Hidden Falls.
Attach a document	<i>Field not completed.</i>

I46-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I46: DOMINIC BRISSEY

Response to Comment I46-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.47 LETTER I47

RECEIVED
MAY 15 2020
CDRA
Letter I47

May 10, 2020

To Whom It May concern;

It is unthinkable that our Leaders in Placer County, agreed to pay thousands of their taxpayers money on expanding this unnecessary project "Hidden Falls". What were they thinking? (no common sense)!!!!

It is fine to protect some of our rural areas for future happiness and a quite place to live restoring the past history, but adding hundreds of people to crawl all over property owners land to entertain themselves? why? and my biggest problem is the cost of all the road improvements that will have to be done? another problem for the local taxpayer?. The problems that have been created at the current spot of Hiden Falls should tell the story.

I47-1

All of the roads leading into this new idea are narrow, we have driven them for years, When a horse/trailer meet another car, someone has to pull over. The roads that are serving our taxpayers now are disgraceful; drive up to the stop light @ Maudi across from the Fire Station, the road is coming apart. Drive down Auburn/folsom Rd, one traveled by thousands each day a complete mess. Why or why not take care of our current problems?? And people wonder why California is losing taxpayers by the hundreds, I love Newcastle/Auburn/ area but I am sick of what our leaders are doing to us!!!!

Stan and Susie Brown

2520 Flume Lane

Newcastle, Ca.

RESPONSE TO COMMENT LETTER I47: STAN AND SUSIE BROWN

Response to Comment I47-1

The commenters express concerns about using taxpayer's money for the proposed project.

The Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that "An economic or social change by itself shall not be considered a significant effect on the environment" (CEQA Guidelines Sections 15131 and 15382). No further response is required.

The commenter is concerned with trespassing.

Please see Master Response 4 – Land Use Compatibility

The commenter states concerns regarding road safety.

Please see the Draft SEIR Section 8.4 "Impacts" in Chapter 8.0 "Transportation and Circulation" for an analysis of impacts on transportation and circulation.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

2.7.48 LETTER I48

Letter I48

Date: May 17, 2020

To: Community Development Resource Agency, Placer County Board of Supervisors,
Planning Commission, and Parks Division

From: Steve Brown
5045 Garden Bar Rd. Lincoln, CA 95648

Regarding: Hidden Falls Regional Park Trails Expansion DSEIR

I48-1

As a longtime resident of Lincoln and member of *Protect Rural Placer*, I am writing to you today to refute the above referenced document. This DSEIR, as with the previous HFRP EIR, makes weak assumptions and does not take into consideration the full impact that this project will have upon the residents, roads, and fire danger of the nearby community. As a longtime resident of Garden Bar Rd., I can tell you that the DSEIR is deficient in traffic assumptions pertaining to Garden Bar Rd. Specifically, the County and Parks Division has sited allowing "classroom size" groups with the current road conditions (with minimal additional signage). When pressed to define "classroom size", we were told groups of 250 people. Allowing groups of any size under current road conditions would be nothing short of negligent, putting the lives of residents and park attendees at great risk for the following reasons:

- Under the current condition, Garden Bar Rd has many blind corners and is extremely narrow at many points (as identified in each of EIR's). Even now, residents passing in opposite directions must often stop and pull off the road in precarious locations in order to allow room for the vehicles to pass. To assume that allowing additional traffic with installation of minimal signage would mitigate this existing danger is absurd.
- The proposed section of Garden Bar Rd. is a radial dead end roadway extending north from Mt. Pleasant Rd. and dead ending nearly 6 miles north near the Bear River. In the event of a fire anywhere north of Mt. Pleasant Rd., Garden Bar Rd. south would be the only viable evacuation route. Even with the current road condition and number of residents, it would likely prove impossible to evacuate residents safely should a fire occur. Introducing park goers to this existing insufficient condition would be negligent, putting all at risk.

Based upon the information in the DSEIR, the assumptions it has made, and the negative impacts to the very communities who were not included in any of the 15-year planning, I request that you reject this project.

Please include my letter as part of the public comment permanent record.

Thank you,

Steve Brown
Garden Bar Rd. Lincoln

RESPONSE TO COMMENT LETTER I48: STEVE BROWN

Response to Comment I48-1

The commenter expresses concern about traffic, road safety, wildfire, and evacuation, especially as it relates to Garden Bar Road.

In relation to the commenter's observations about the current geometry and condition of Garden Bar Road, attention is drawn to Table 3-2 of Chapter 3.0, "Project Description," of the Draft SEIR. In Table 3-2, improvements to Garden Bar Road are listed that would be completed prior to the opening of various phases of development to additional public access.

Please also see Master Response 3 – Traffic, Circulation, and Parking, and Master Response 2 – Wildfire, Safety, and Emergency Response.

2.7.49 LETTER I49

Letter I49

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 11:26 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Garrett Brown
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	<i>Field not completed.</i>
I49-1 Comments	Hidden falls is amazing. Biking there is so relaxing and calming. It is an awesome way to be in nature and be outside if hiking is not an option or it is, either hidden falls is where to go.
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I49: GARRET BROWN

Response to Comment I49-1

The commenter expresses his enjoyment of the park.

The expression of enjoyment is noted. No further response is required.

2.7.50 LETTER I50

Letter I50

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 10:25 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Ryan Brown
Email Address (Optional)	ryanbrown03@gmail.com
Agenda Item (Optional)	Hidden falls expansion project
Comments	My family and I love the out doors. We have hiked in the current hidden falls park several times and have also been turned around at the front gate secondary to being to many people. If passed, this would preserve more trails and more access to these trails for your family and thousands of families for years to come.
Attach a document	<i>Field not completed.</i>

I50-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I50: RYAN BROWN

Response to Comment I50-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.51 LETTER I51

Letter I51

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 11:56 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Nora Bruce
Email Address (Optional)	norapedar@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project

I51-1

Comments	Hello, I'm a resident in nearby Arden-Arcade, just down Highway 80. I've been hiking Hidden Falls Regional Park for several years with my husband and our two boys. We've brought family and friends with us to enjoy this beautiful space year-round as well, trying new trails every time we go. It's an incredible asset to the entire region and a rare opportunity for people in this area to experience what Placer County wilderness is like. I absolutely support this proposal to add new trails and trailhead parking to this regional park. As it is, this space is a true gem. The single-access and current parking lot is a pain point though - since so many cars have to be turned away on given days. We've adjusted to the reservation system but the addition of another trailhead and parking lot would certainly allow more of those travelers to adjust and spread out through the park instead of driving back disappointed.
----------	---

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I51: NORA BRUCE

Response to Comment I51-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.52 LETTER I52

Letter I52

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 11:47 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Pedar Bruce
Email Address (Optional)	pbwinginit@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	Hidden Falls is an incredible outdoor connection and destination for so many of us families in the region. We have taken our children there for many years and see many others enjoying this space. The limited parking certainly has been challenging for many people to enjoy this space though. We've gotten used to reserving parking a day before but I can see LOTS of frustrated travelers every time I go. Those are all locals or nearby residents as well - all pretty frustrated that they can't access this huge space, due to a limited parking lot. One additional frustration right now is that unless you're a biker or equestrian, the furthest reaches of the park aren't really utilized by hikers at all. I highly encourage this opportunity to add more trails and more parking access to Hidden Falls Regional Park. This would allow more locals and tourists to enjoy this space and spread out among the beautiful trails instead of impacting the one existing entrance and neighborhood.
Attach a document	<i>Field not completed.</i>

I52-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I52: PEDAR BRUCE

Response to Comment I52-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.53 LETTER I53

Letter I53

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 5:06 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Jeffrey Bruchez
Email Address (Optional)	jbruchez@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	Hello, Thank you for reviewing my comment. As a new resident in the Sacramento region and a passionate bicycle advocate I believe it's critical to our environment's future to have ample bicycle recreation facilities and wholly support the Hidden Falls Trails Expansion Project. Please consider this project as it will reinforce a healthy recreation and climate saving means of joy for many generations to come.
Attach a document	<i>Field not completed.</i>

I53-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I53: JEFFREY BRUCHEZ

Response to Comment I53-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.54 LETTER I54

Letter I54

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 5:39 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Joseph Bryant
Email Address (Optional)	Bryant.joseph.d@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I support the Hidden Falls Trail Expansion Project! The congestion in the park demonstrates just how much pent up demand there is for these types of spaces in our growing county. Adding additional access, parking, and trail heads to help spread out users across the park is greatly needed to ensure that everyone can experience this beautiful and unique asset. Future generations will thank us for preserving access to open spaces where they can recreate and experience the natural environment. I live in Roseville and had been using the park often until it became difficult to arrive before it was full. I had often been recommending it to friends, but now have to give the caveat that it is so busy they should consider recreating elsewhere. For my own sake, I have even attempted to ride my bike to the park but found the roads to the current entrance to be unsafe by bicycle. More access points to the park, even without parking would be quite welcome if they were from roads more conducive to bicycle travel, public transit, or good old fashion walking. I also would fully utilize an expanded trail network, as most trails in the area tend to be too short.
Attach a document	<i>Field not completed.</i>

I54-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I54: JOSEPH BRYANT

Response to Comment I54-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.55 LETTER I55

Letter I55

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:39 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Alexander Bryant
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I support the Hidden Falls Trail Expansion Project because more and more people are committing themselves to healthy lifestyles and to explore new places. It's already a beautiful area and would benefit everyone if more trails were available. Please also add more parking, trailhead to help spread out crowds.
Attach a document	<i>Field not completed.</i>

I55-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I55: ALEXANDER BRYANT

Response to Comment I55-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.56 LETTER I56

Letter I56

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 10:24 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Jason Buckingham
Email Address (Optional)	jason_buckingham@yahoo.com
Agenda Item (Optional)	Hidden Falls trail expansion project
Comments	I support the Hidden Falls trail expansion project. Expanding trail access in the region is important for several reasons. Trails in Placer county attract users from all across the state making them important economic drivers. Responsibly increasing trail options through expansion of the trail map reduces user congestion which increases the user experience. Also, by distributing the trail head parking options we reduce the impact of parking in neighborhoods already experiencing overcrowding.
Attach a document	<i>Field not completed.</i>

I56-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I56: JASON BUCKINGHAM

Response to Comment I56-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Shirlee Herrington

From: Karen Buehler <mtc_kbuehler@yahoo.com>
Sent: Wednesday, May 20, 2020 9:07 PM
To: Placer County Environmental Coordination Services; Placer County Board of Supervisors; Sue Colbert
Cc: Karen Buehler
Subject: [EXTERNAL] Residents at 9220 Cramer Road RE Twilight Ride on Bell Road

Placer County Resource Development Agency, Environmental Coordination Services

- 3091 County Center Drive, Suite 190, Auburn, CA 95603
- cdraecs@placer.ca.gov

Placer County Board of Supervisors

- 175 Fulweiler Avenue, Auburn, CA 95603
- BOS@placer.ca.gov

Placer County Planning Commission

- 3091 County Center Drive, Auburn, CA 95603
- scolbert@placer.ca.gov (Sue Colbert, Planning Commission Clerk)

Dear Agencies, Supervisors & Planning Commissioners:

Let me start off by letting you know that when I wrote this I directed my comments towards the people that have planned this. When you read this please understand my frustration is not directed at you. I think it's better if I don't edit this otherwise it may sound too sterile. I'm submitting as is!

I57-1 | Twilight Ride location is where the County plans to put the largest parking lots of any of the Hidden Falls expansion locations. 40 horse trailer parking and 100 car. See Chapter 7 (Visual Resources) page 11. This shows where they plan to build this gigantic parking lot (shown in red). If you look just above the red area you will see our house and property. It appears this huge parking lot will be butted up against our fence line – this isn't right! We bought this particular piece of property because of the phenomenal view and now you want to build a huge parking lot so we will be looking at concrete, cars, trucks/trailers, etc. when we look out our back window or working out back which is the majority of my time here we will be looking at concrete, vehicles and people. We have a farm with over 80 animals a refuge if you will. We bought this property because it was our dream to live in the country and have lots of animals. The focal point of our property is out the back. I'm on every part of this back part of our property daily.

A 50-acre parcel was purchased, please move the parking lot so it's away from our home!

I57-2 | It is bad enough that our home insurance has doubled which is barely affordable, now it will increase even more, how is that fair? Why should we have to pay more for insurance because you choose to endanger our lives? To be honest, you are signing our death warrants, if or should I say when a fire breaks out, we will be taken out immediately, our animals, our home, our lives. Litter/trash will be flying onto our property every day – so I guess I'm going to have to clean this up? Really? I have enough to do on a day to day basis, working out of town 3 days per week, then I come home to catch up but no I'm sorry, I'll clean the house later, I need to walk the property to pickup other people's trash? Our property value is now going to decrease, we put everything we had into this property and with your project you are taking this away.

I57-3

My husband is very sick with 4th stage cancer, we really didn't need another catastrophic event in our lives. The parking lot is too close to our property, we would hear everything going on over there, this should have been taken into consideration. Unlike most of the surrounding properties, ours is right down there in the mix. We have the right to peace and quiet, we bought this property for that reason. We also have the right to privacy, we will have no privacy if you put that parking lot according to the picture on page 11. We moved out to the country to be in just that – the country! The county purchased 50 acres of property and there's certainly other areas you can build that parking lot [and whatever else you have planned] where you are not blatantly pushing it in our faces and ruining our livelihood and our sense of peace and tranquility. The plans show a complete and utter disregard for us as property owners, city residents and just disregarding us as human beings.

We have the right to not be disturbed or be looking at public concrete and traffic out our back window, the back side of our property is the focal point for this property and you will be taking that away from us. Both Andy Fisher and the woman that works with him her name escapes me at the moment and I really don't have time to look it up but you know who she is, well they came out to our property per our request because we wanted to show them how their parking lot project would affect us. When looking at the location of where they plan to pour the concrete it appears they have not taken any consideration for our property as it's completely visible when I'm outside in back. We are not high on a hill or far away from this parking lot. We are down low within earshot of hearing everything that goes on in said parking lot including children screaming, vehicles pulling in, etc. Do our lives not matter?

I57-4

Home insurance has already doubled for us, if you put this park in it will triple and we won't be able to afford it. There's just not enough money, this isn't right. We fear for our safety. There has already been 2-3 fires on big hill since we moved here in May 2013.

You are signing a death warrant for my family and all of our animals!

Not only does this affect us emotionally, spiritually but also financially. Our property value immediately drops due to this eyesore. What are you going to do about this?

Issues:

Loss of our peaceful, scenic view

Property Value

Fire Danger

I57-5

Trash

Theft

In summary, this is how your proposed park will affect our lives:

Increased cost of FIRE insurance – we need to pay more money because of you

Home value will decrease – we will be losing value in our home

Zero Peace of Mind – we now must worry about the safety of our lives, our animals and our home on a daily basis

Increased Stress – due to worrying about our safety

Now you tell me how is this fair? We can't afford to pay any more money for home insurance than we are now. We are livid, it's just not right for you to ruin the lives of everyone around this 'proposed' park entrance.

I'm an experienced equestrian and I've ridden at Hidden Falls. It's a nice park, but I have to say that I see trash on the trails that really chaps my hide. There's just no excuse for this. People that come to the park and toss their trash like this are disrespectful. Those are the same people that will smoke on the trails that will eventually start a fire that will kill all of us. I don't see anyone enforcing no smoking on the trails, I don't see anyone enforcing anything at Hidden Falls. There's nobody there except to collect money on the weekends at the entrance. There's no one on the trails so once park goers are in they can do whatever they want. Let's face it, most young kids don't care about much. They don't have a sense of responsibility or care about what could be dangerous/hazardous to others. It's more about looking/acting cool amongst their peers.

Let's also come to terms with the fact that the homeless in this area come off as being entitled. They harass my husband when he goes shopping at Safeway. They will find their way onto this 'open space' land and camp out. Who's going to know. You have signs that state when park goers must leave the park but do you check?

I'm going to tell you something; if you choose to put that parking lot and other amenities just on the other side of our fence line which is smack in the middle of where I spend 50% of my time when I'm home then you should expect a lot of interaction between this household and your park goers ~ it's not going to be pleasant. These unpleasant interactions will then be posted on social media sites or perhaps it will even make it on the news. We don't want your concrete around our home. If we were farther away it might not be so offensive but you plan to build this too close to our home.

I57-5
Cont'd

Twilight Ride entrance is a hazard for our roadways which we don't want widened or trees taken out to accommodate. We like our country roads, put yourself in our shoes.

Are you going to compensate us for our losses? This is a tremendous loss to our home/property as well as others, but I'm going to focus on our personal losses as everyone else has had their opportunity to speak about theirs.

We are imploring you to reconsider your plans for twilight ride. It's too big and you are doing this on agricultural la95602nd which is meant to graze cows. PRA – Protect Rural Auburn was put together by a large group of concerned residents in this area. Listen to our concerns – they are real. The letters you get from the opposition basically say 'we want this park so we can exercise, enjoy nature, etc.' This is not a valid reason to ruin the lives of all the people living here. We bought our homes here, this is where we live!! Of course people that don't live here don't give a damn. If the situation was reversed, they would not be in support of the project. There's a plethora of places to go get exercise ...your statistics are rigged.

I understand my comments are all over the place but to be honest, I don't have the time to carefully format my thoughts right now. You can get the gist of what I'm saying without me spending anymore of my time. I imagine you won't do anything about this anyhow so I'm not holding my breathe, but again **please move your plans for parking lot and whatever else you plan to build out there AWAY FROM OUR VIEW!!!!**

It's bad enough that we will see all the people coming through on the trail smack behind us, we shouldn't have to look at the parking lot in addition to our privacy being invaded.

Thank you for reading this as it comes from the heart.

Sincerely,

Karen Buehler

I57-5
Cont'd



9220 Cramer Road
Auburn, CA 95602
650.823.2635

RESPONSE TO COMMENT LETTER I57: KAREN BUEHLER

Response to Comment I57-1

Commenter expresses concern for farm animals in proximity to the Twilight Ride parking lot. Following a site visit to the commenter's property by County staff and discussion about the commenter's animals, site plans were modified to add a buffer zone and interior fence between the proposed parking lot and common property boundary in order to keep park visitors away from the neighboring animals. The buffer zone will also be cleared annually as a fuel break for fire risk reduction.

The commenter has concerns about visual resources.

The area of the Twilight Ride property where the parking area is proposed is mostly obscured from the commenter's home by existing trees and shrubs. The main view from their house of the northwest corner of the Twilight Ride property will not substantially change. No construction is proposed for the northwest corner of the property. Please see Draft SEIR Section 7.4 "Impacts" in Chapter 7.0 "Visual Resources" for an analysis of impacts on visual resources.

Response to Comment I57-2

The commenter is concerned about home insurance increasing due to the proposed Project.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

The commenter is concerned about fires, safety and litter.

Please see the Draft SEIR Section 16.4 "Impacts" in Chapter 16.0 "Wildfire" for an analysis of wildfire impacts.

Please also see Master Response 2 – Wildfire, Safety, and Emergency Response and Master Response 4 – Land Use Compatibility.

The commenter feels that their property value is now going to decrease.

The Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that "An economic or social change by itself shall not be considered a significant effect on the environment" (CEQA Guidelines Sections 15131 and 15382). No further response is required.

Response to Comment I57-3

The commenter is concerned about noise, traffic, and the parking lot.

Please see Response to Comment I57-1.

With regards to noise, the finding of significance is not measured by if sound can be heard but depends on the level of the sound. The operational level of sound from non-transportation sounds must exceed applicable County noise standards to be considered significant. The following Mitigation Measures were determined to reduce operational sound levels to less-than-significant:

Mitigation Measure 10-1: Restrict General Public Traffic to 6 a.m. to 30 Minutes after Sunset.

The County shall restrict all long-term general public traffic to 6 a.m. to 30 minutes after sunset by ensuring that the expansion area parking gates are closed and locked outside of these times. With implementation of Mitigation Measure 10-1, traffic noise level increases on Garden Bar Road North would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure S10-2, would reduce Impact 10-3 to a less-than-significant level.

Mitigation Measure S10-2: Use of pavement or similar hard material is required when laying the final surface on access roads and limit vehicle speeds to 25 mph.

The County shall use paving or similar hard surfacing material when constructing new access roads to reduce tire noise generated from interaction with gravel. Vehicle speeds on the newly constructed access roads shall be limited to 25 mph. With implementation of Mitigation Measure S10-2 traffic noise level increases would be reduced below a substantial amount (3 dBA or more), as shown in Table 10-1. This, in combination with Mitigation Measure 10-1, would reduce Impact 10-3 to a less-than-significant level.

No further response is required.

Response to Comment I57-4

The commenter expresses concerns about insurance cost.

Please see Response to Comment I57-2 above.

Response to Comment I57-5

The commenter is concerned about the emotional, spiritual, and financial effects of the proposed project, including their property value dropping.

As previously stated, the purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). With that said, the County wants to be a good neighbor and will continue an open dialogue with the commenter in order to address future problems should they arise from the proposed parking area on the Twilight Ride property. No further response is required.

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 4:49 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Sherrie Bunk
Email Address (Optional)	sbunkpetersen@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project

<p>Comments</p>	<p>This communication is in support of the Hidden Falls Expansion Project. Expanding the Hidden Falls trail network will be a priceless asset to Placer County, preserving the rural landscape for Placer County residents, our county guests, and for generations to come. Approval of the plan for the trails is vital to families, hikers, runners, equestrians, and bikers and will improve the health of trail users, reduce parking issues, and reduce impact on the most used trails. The new points of access to the expanded trail network system, with parking areas supported by trailhead amenities, including restrooms and picnic areas will vastly improve Hidden Falls while maintaining the natural resources, providing wildlife habitat, and celebrating the county's unique visual character. These additional points of access to Hidden Falls will generate shorter trips on local roads, fewer air emissions, and would decrease activity at the new proposed trailheads.</p> <p>Communities in Placer County have expressed that 91% desire more trails and recreation access to open space. With the majority of growth anticipated to occur in western Placer County over the next ten years, the expanded Hidden Falls Park is a tremendous asset for meeting these needs.</p> <p>I am glad to see Placer County will continue to allow cattle grazing within Hidden Falls Park. Other respected agencies such as the Point Reyes National Park and East Bay Regional Park District in the Bay Area have successfully integrated cattle grazing with public trail use.</p>
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I58-1

Attach a document

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Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I58: SHERRIE BUNK

Response to Comment I58-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.59 LETTER I59

Letter I59

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 8:29 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Rich Burger
Email Address (Optional)	rh.burger@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion

I59-1

Comments	I wish to comment on this awesome opportunity to add to a growing network of trails in Placer County, and why more is going to benefit all of us. I'm a heavy trail user of trails in Placer county and enjoy sharing the trails with all types of users. Runners, hikers equestrian, mountain bikers, all will benefit from a new expanded trail system at Hidden Falls. We need space to do the things we love, and it's so much healthier than other options out there today. Home owners near these trails should love this expansion because their property value will go up. Businesses in Auburn should love it because we all go eat and drink after we exercise, and with more spending and property values the county will get more funding. It's really a win/win for all. Take a look at Bentonville Arkansas and see what the trail system there means to the economy there and neighboring cities. We can do this and it benefits all of us!
----------	--

Rich Burger
7995 S Lake Cir
GB CA 95630

Attach a document	<i>Field not completed.</i>
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RESPONSE TO COMMENT LETTER I59: RICH BURGER

Response to Comment I59-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.60 LETTER I60

Letter I60

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 1:55 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Dayna Burgeson

Email Address (Optional) Burgesonfarm@sbcglobal.net

Agenda Item (Optional) Hidden Falls Expansion

I60-1 | Comments I am writing to strongly encourage a yes vote on the Hidden Falls Expansion. This recent epidemic has emphasized the importance of providing adequate public outdoor spaces for exercise and recreation to promote both physical and mental [health.](#) In many places demand for recreation areas has exceeded supply leading to crowding and restrictions on use of outdoor spaces due to inability to physically distance. The public demand for this access has led to conflict, emphasizing the value of outdoor recreation to society at large. It is critical to provide these resources now and in the future as our county continues to experience an increase in population which will lead to increased demand. A small vocal minority should not circumvent the needs of the overwhelming majority who are in support of this project.

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I60: DAYNA BURGESSON

Response to Comment I60-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.61 LETTER I61

Letter I61

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:31 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Evan burgeson
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls Park trail expansion
Comments	Hidden falls is a huge benefit to our local community and we need to do everything we can to cherish and improve this amazing county resource. Building new trails will help spread the demand for trails over a larger area and decrease user impact and crowding.
Attach a document	<i>Field not completed.</i>

I61-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I61: EVAN BURGESSON

Response to Comment I61-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.62 LETTER I62

Letter I62

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:06 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Jeff Byrne
Email Address (Optional)	Jeff.l.byrne@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I62-1 Comments	I support the expansion of the hidden falls trail system. Living in San Francisco, I make a point to get outside the city and enjoy nature - both on my bike or just hiking with the family. Extensive beautiful trail systems are an essential part of a healthy outdoor lifestyle
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I62: JEFF BYRNE

Response to Comment I62-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.63 LETTER I63

Letter I63

Shirlee Herrington

From: Michele Calbi <calbim09@gmail.com >
Sent: Tuesday, April 14, 2020 8:14 PM
To: Cindy Gustafson
Subject: Public Hearing Request

I63-1

Cindy: Please reschedule the Hidden Falls public hearing when the hearing can facilitate the public.

The internet capability is not sufficient in remote rural Auburn to facilitate many concerned citizens, including myself.

This subject matter is of utmost importance.

Please represent Auburn by requesting postponement until such time as the public can attend this important meeting.

Thank you and please stay healthy and safe.

Michele Calbi
4984 Bell Road

Sent from my iPhone

RESPONSE TO COMMENT LETTER I63: MICHELE CALBI

Response to Comment I63-1

The commenter request that the public meeting be postponed.

Please see Master Response 1 – Public Comment Process.

2.7.64 LETTER I64

Letter I64

Hidden Falls Trails Expansion

Below are my comments as it relates to the HFRPTE Subsequent DEIR due no later than May 20, 2020 at 5 pm.

Executive Summary

Wildfire rated "Less Than Significant"

Do you consider insurance carriers cancelling insurance for area residents near Twilight "Less than Significant"? Please justify

Do you consider the California Fair Plan significant increase in fire insurance premiums for those residents in the Twilight area "Less Than Significant"? Please justify

Physical Improvement in the form of helicopter landing pads, water storage, and a LRV would benefit the entire area, as stated in the Executive Summary. Are these purchased items going to increase real estate tax dollars already having been increased during the past 5 years? If so, do you consider the increase in taxes "Less Than Significant"? Please justify

Mitigation Measures: "None Warranted". Please justify.

I64-1 A pre-plan for evacuation is required and needs to be communicated to residents, visitors, fire protection and police. The "what if" scenarios directly related to the origin of the fire and subsequent evacuation/control is required based on limited and less than substantial roadway exits on Lone Star, Cramer, and Bell Roads.

In addition, the Twilight area and proposed trails require pre-opening preventive fire clean up initially and annually to maintain as safe as possible visitor area. Where will the budget for annual cleanup prior to fire season be allocated?

It is a requirement to make the information obviously available to visitors. Refer to the Emerald Park posted warning signs regarding water level. It is clearly obvious about the dangers as posted on trees throughout the park. Do not downplay the wildfire issue; as our insurance carriers consider the wildfire issue so important they cancelled insurance. Improve the plan from "allow small signs" to large displays at the entrance and throughout the trails.

Due to Wildfire imminent danger recognized by insurance carriers, it is recommended the Twilight access be tabled/cancelled until such time as climate improvements occur to eliminate wildfire hazards to the point where insurance carriers will again insure surrounding properties. Use the re-insurance as a Key Metric in future "go" decisions. You are requested to implement this recommendation or communicate why insurance company decisions are inadequate indicators of the Wildfire danger.

SECTION 16.0 WILDFIRE

The following statement, "Since the opening of HFRP in 2006, there have been no known wildland fires originated by HFRP users." is not a good reason to justify adding Twilight. During 2019, there was a significant fire started by a long time resident requiring fire retardant and helicopter water buckets. If a fire can be started by a long time resident (who should know better than do the activity he was doing at the time); there is a significant chance for a fire in the Twilight area; thus the cancellation of home fire insurance.

Our long time insurance carriers agree with this assessment as most of the area residents have had their fire insurance cancelled and must now pay significant fees for the California Fair Plan. Questionable about how "fair" the insurance charges are now for residents. Should Twilight become a reality; it is guaranteed the rates for fire insurance will continue to increase due to increased traffic and Wildfire risk. What is the County's plan to mitigate these insurance issues?

Why is it so imperative to create a venue (Twilight) with significant Wildfire risk requiring the following equipment purchases:

- 2-3 helicopter pads,
- 12,000 gallon underground water tank,
- bridge structures to accommodate fire equipment,
- 12-foot drivable access from each entry point, and
- purchase a LRV (County funded), to name a few fire curtailments

I64-1
Cont'd

What is the expected tax impact to Placer County residents due to this expensive trail access and fire mitigation equipment?

What is the reasoning of all the equipment when there isn't a Road Exit Plan in the SEIR? We will agree an exit plan is dependent on where the fire starts. However, it is important to have a PLAN from each exit onto the roads to determine whether there is a level of safe capacity to endure without a Paradise event replay (traffic inhibiting the ability to exit the affected fire area).

Should there be a fire near the Twilight Ride, the exits are as follows:

Lone Star Road

Residents from the Auburn Valley Golf Club area and golfers/event participants will use Lone Star.

Approximately 60 residents x 2 cars on average

120 vehicles x 14.7 feet = 1,764 feet

Golfers and event guests 100 cars

100 x 14.7 feet = 1,470 feet

Residents from connecting roads to Lone Star Road? 100 vehicles? The traffic study should include a study of number of residences and the number of evacuation vehicles for these homes.

Approximately 0.9 of a mile traffic

What is the plan to get all of the visitors and residents out using Lonestar Road (1 lane and dangerous curves) with nearly 1 mile or more of vehicular traffic?

Exiting onto Grass Valley Highway making a right hand turn will quickly inhibit the ability of Cramer Road traffic to enter Grass Valley Highway.

Hidden Falls Trails Expansion

Letter I64
Cont'd

↑ Cramer Road

Most of the people parking at Twilight will probably use Cramer Road.

Cramer Road is a dangerous one lane road with blind curves.

The length of Cramer Road is 1.6 miles.

Twilight parking capacity:

102 autos and 38 equestrian vehicles

102 autos x 14.7 feet (average length of an auto) = approximately 1,500 feet

38 equestrian vehicles x (14.7 feet + 15 feet = 29.7 feet) 1,129 feet

Total: 1,500 feet + 1,129 feet = 2,629 or 0.5 miles of Twilight traffic

With 0.5 miles of traffic from Twilight only (consider the parking lot to be full capacity), what is the plan to get Cramer Road residents and Fawn Ridge Winery guests out of the area?

How will you prevent people from taking a left onto Grass Valley Highway causing exit delays if the round about does not deter a left hand turn?

With oncoming traffic on Grass Valley Highway (including Lone Star vehicles exiting), what is the plan to keep all traffic moving without causing accidents?

One accident blocking Cramer Road has the propensity to stop all traffic while the fire is incoming without an additional exit for those vehicles already on Cramer Road.

I64-1
Cont'd

Bell Road

Residents south of Twilight will take Bell Road to Joeger and Grass Valley Highway. Consider that Lone Star and Cramer are spilling into Grass Valley Highway while the Bell Road residents are doing the same. What is the plan to keep traffic moving out of the area?

While the County rated Twilight Ride as *Moderate* fire risk, insurance companies, such as Farmer's, considers the area *High* thus cancelled insurance. What is the reasoning for Placer County to create a venue where more visitors are in this area when insurance companies refuse to insure property due to fire risk? What is the justification?

Page 25, Table 8

Collision Analysis (1/1/2-14 – 12/31/2016)

The study is over 3 years old at the end date.

The report contains irrelevant, aged data considering the increase in traffic since 2016. It is requested the study restate findings through March 2020; which is readily available. Current data is a valid requirement to substantiate all findings.

Please make a note these roads are frequently traveled by local residents. When there is an accident on Cramer and Bell Roads, the accident usually involves an out of area person not familiar with the curves and/or ignores the warning signs. Should Twilight occur, accidents will increase as traffic increases.



I64-1
Cont'd

↑ You are asked to contact the Livingstons who live on the Bell Road curve where most accidents occur and are not reported by the offender. Mr. Livingston had to replace his fence numerous times since 2016. KDA would not have a record of these incidents, however, the accidents should be noted to make a full disclosure decision.

Project Characteristics

Project Site Plans and Improvements Page 28

Twilight Ride Site.

Page 47

KDA indicates, "A left turn lane will be required at the Twilight Ride Site." This is imperative during Phase 1.

Residents and visitors are not less significant than Phase 2 residents and visitors. It is imperative the left turn is mandatory during Phase 1.

Automobile Safety Impacts

Page 52

"the project's impact to safety on Cramer Road is considered to be *potentially* significant." Is an incorrect statement for the following reasons:

GPS directs drivers to Cramer Road for access to Bell Road. When placing the Twilight address on GPS Cramer Road is the directive. The statement should be amended to read, "the project's impact to safety on Cramer Road is considered *significant*."

If the right turns are allowed to access Cramer only due to the roundabouts; Bell Road will then experience significant safety impact. Please address this Bell Road increased traffic issue.

Design of Twilight Road Site Access to Bell Road

Page 53

As previously recommended, installation of a separate northbound left turn lane on Bell Road at the access must be completed in Phase 1; NOT wait until Phase 2.

Section 16.4 Mitigation Measures; Item 8.

"CAL FIRE/Placer County Fire Department will be given room for a small information kiosk at each of the parking areas for use during peak fire season."

Please change this Mitigation Measure to read, "CAL-FIRE/Placer County Fire Department will be given space for a large information kiosk at each of the parking areas for use during peak fire season to post a RED BALL and stating "PEAK FIRE SEASON – NO SMOKING OR FIRES". In addition, signs should also be posted on trees throughout the trails. Please confirm this requirement will be changed to increase fire risk awareness.

How will Placer County prevent people, especially homeless from staying overnight and camping with campfires (4,000 acres)? Locked gates will (supposedly) keep people out, however, how will you prevent people from continuously camping and staying overnight? What is the plan to secure the trails?

↓

Hidden Falls Trails Expansion

Letter I64
Cont'd

SUMMARY

Trails are nice to have; Wildfires are not.
Most Wildfires are started by people; do not increase the risk of Wildfires by increasing the people.
Insurance companies have sophisticated Wildfire risk metrics.
The Planning Commission/Placer County decision-makers need to heed insurance companies' warnings.

I64-1
Cont'd

Due to Wildfire imminent danger recognized by insurance carriers, it is recommended the Twilight access be tabled/cancelled until such time as climate improvements occur to eliminate wildfire hazards to the point where insurance carriers will again insure Twilight surrounding properties.

Use the re-insurance timeframe by insurance companies as a Key Metric in future "go" decisions to open Twilight access. You are requested to implement this recommendation or communicate why insurance company decisions are inadequate and irrelevant indicators of the Wildfire danger.

Thank you for taking this into consideration.



Michele Calbi
4984 Bell Road
Auburn, CA 95602
May 14, 2020

x x x

RESPONSE TO COMMENT LETTER I64: MICHELE CALBI

Response to Comment I64-1

The commenter expresses concerns about wildfire and homeowners' insurance.

Please see Draft SEIR Section 16.4 "Impacts" in Chapter 16.0 "Wildfire" for an analysis of wildfire impacts. Please also refer to Master Response 2 – Wildfire, Safety and Evacuation regarding wildfire and insurance.

The commenter asks whether or not the project improvements will cause a rise in real estate taxes.

Real estate taxes are based upon the value of the home and the land, and not whether or not an open space area is nearby.

The commenter is concerned with evacuation in case of a wildfire.

Please see Master Response 2 – Wildfire, Safety and Evacuation.

The commenter asks where the budget for annual fire maintenance will come from.

Both the County Parks Division and the Placer Land Trust will provide vegetation management on a yearly basis. PLT has stated that they will be continuing cattle grazing within the areas they own as a part of their vegetation management program.

The commenter states that having informational signs for visitors should be a requirement.

If the proposed project is approved, there will be informational kiosks in each of the parking areas, with a separate area for fire-related information. Additionally, educational signage will be strategically placed within the trail system to inform visitors about important issues such as not interacting with range cattle, closing gates as appropriate to keep cattle from escaping, keeping dogs on leash, wildfire warnings (including no smoking/BBQ's/campfires), history of the area and the people who have inhabited it previously (miners and Native Americans), information on the flora and fauna, why keeping on the trails is important for the health of the environment, and a variety of other pertinent and interesting information.

The commenter states that the Twilight Ride portion of the proposed project be tabled/cancelled until such time as wildfire hazards can be eliminated enough so that insurance companies will insure surrounding properties.

Please see Master Response 2 – Wildfire, Safety and Evacuation for a discussion on homeowner's insurance.

The commenter states concern regarding the collision data provided in the Draft SEIR.

Please see the updated collision data provided in Master Response 3 – Traffic, Circulation and Parking.

The commenter states that a left turn lane into the Twilight Ride parking area must be constructed during Phase 1.

The need for a left turn lane is based upon the American Association of State Transportation and Highway Officials (AASHTO) guidelines. Based upon the 2018 AASHTO guidelines, a left turn lane is not required until Phase 2.

The commenter asks how Placer County will prevent people, especially homeless from camping overnight and starting campfires.

The expansion area is rurally located, and the vast majority of people will arrive by car. Each night at the current HFRP, prior to locking the gates for the evening, the rangers conduct a sweep of the park if any cars are remaining in the parking area after hours. The same procedure would be employed within the expansion areas to ensure that people would not stay overnight.

2.7.65 LETTER I65

Letter I65

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 7:42 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Kelly Carducci
Email Address (Optional)	kcmassage@sbcglobal.net
Agenda Item (Optional)	Hidden Falls Expansion
I65-1 Comments	I am in favor of more trails and parking access.
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I65: KELLY CARDUCCI

Response to Comment I65-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.66 LETTER I66

Letter I66

Shirlee Herrington

From: Jeff Carlisle <jeffcarlisle17191@icloud.com>
Sent: Thursday, May 14, 2020 6:45 AM
To: Placer County Environmental Coordination Services
Subject: [EXTERNAL] Hidden Falls Expansion

I66-1

Briefly: as a 5 year Placer County resident, and frequent user of Hidden Falls Trail network, I support the Hidden Falls expansion. In addition to the recreation opportunities, this provides economic benefit to the county.

As an 18 year member of the CHP, I also recognize potential for traffic to increase on small county roadways increasing traffic complaints and potentially creating an unsafe situation with out of area tourists speeding. I also recommend the county budget for traffic calming in and around approaches to trailheads.

Jeff Carlisle, Lincoln

Sent from my iPhone

RESPONSE TO COMMENT LETTER I66: JEFF CARLISLE

Response to Comment I66-1

The commenter expresses support for the project.

The support is noted. No further response is required.

The commenter also suggests considerations to address traffic calming devices around the entrances and speeding on the local roadways.

Please see Master Response 3 – Traffic, Circulation, and Parking. With regards to speeding, the California Highway Patrol (CHP) is responsible for enforcement. CHP has also been responsive to past requests from the County to help enforce parking issues and CHP officers have responded to requests for additional enforcement on segments with speeding issues.

2.7.67 LETTER I67

Letter I67

Shirlee Herrington

From: noreply@civicplus.com
Sent: Saturday, May 16, 2020 5:40 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Colin Carr-Hall
Email Address (Optional)	fishtacoeater@hotmail.com
Agenda Item (Optional)	Hidden Falls Trails Expansion Project
I67-1 Comments	I fully support the trails expansion n project. Hidden Falls is a gem in this area and the current trail system would be greatly enhanced by new and/or improved trails (where needed). I live in Roseville and also spend money at the surrounding wineries and certain eateries on Highway 49 every time I visit.
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I67: COLIN CARR-HALL

Response to Comment I67-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.68 LETTER I68

Letter I68

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 12:25 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Ben Carter
Email Address (Optional)	Tricartertri@yahoo.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I support the Hidden Falls Trail Expansion Project, because it will increase the trail riding opportunities in the area for myself, my friends and my kids. Mountain biking is growing every year, more parking will help with already over capacity parking, more trail heads will help spread people out, and creates more opportunities for people to stay local and be outdoors doing healthy activities. Ben Carter El Dorado Hills
Attach a document	<i>Field not completed.</i>

I68-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I68: BEN CARTER

Response to Comment I68-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.69 LETTER I69

Letter I69

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 8:19 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Patrick Carter
Email Address (Optional)	plcarter1@hotmail.com
Agenda Item (Optional)	Expansion program
I69-1 Comments	I would like to think that the people in charge would reach out to PeopleForBikes in garnering public awareness please.
	A fan of hidden falls
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I69: PATRICK CARTER

Response to Comment I69-1

The commenter asked about outreach to the e-bike community.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

2.7.70 LETTER I70

Letter I70

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:36 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Patrick Carter
Email Address (Optional)	Pcarter1@hotmail.com
Agenda Item (Optional)	Hidden falls expansion
I70-1 Comments	I would hope hidden falls would include class 1, class 2, and embtb Ebikes access for us seniors that think we still have it that want to get out in Mother Nature. With gratitude This 68 year old man
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I70: PATRICK CARTER

Response to Comment I70-1

The commenters asked about e-bike access.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

2.7.71 LETTER I71

Letter I71

Shirlee Herrington

From: Jackie Caswell <jackiefcaswell@gmail.com>
Sent: Friday, April 17, 2020 5:14 PM
To: Cindy Gustafson; Kelly McCaughna
Cc: Robert Weygandt; Shanti Landon; Jim Holmes; Beverly Roberts; Todd Leopold
Subject: Public Hearing for the HFRP Expansion Project

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Cindy, Robert,Jim,Bonnie and Kirk

I71-1

I wanted to thank all of you for continuing to serve the people of Placer County while we all struggle to contain the Coronavirus

Since Dr Aimee Sisson has issued the new ruling that extends the Shelter In Place order through May 1st and probably longer, I would like to request that as our supervisors you will take action to table the Public Hearing for the HFRP Expansion Plan which is on May 14th as no large group gatherings will be possible by that date.

There are many people who wish to attend and remote access is NOT a viable option for a large percentage of the rural population, including myself, because of insufficient internet connectivity. I would be unable to watch live streaming of the meeting, the presentation and the comments. It would make it impossible for me to participate and many people in the area are in the same position as myself.

Please make sure that this vital meeting is postponed or canceled at this time until we can all safely meet and voice our opinions I look forward to hearing from you

Yours sincerely

Jackie and Peter Caswell

Sent from my iPhone

RESPONSE TO COMMENT LETTER I71: JACKIE CASWELL

Response to Comment I71-1

The commenter has concerns about the public outreach process.

Please see Master Response 1 – Public Comment Process.

Shirlee Herrington

From: Peter Caswell <pcaswell@netbase.com>
Sent: Thursday, May 14, 2020 6:20 PM
To: Placer County Environmental Coordination Services
Cc: Jackie Caswell (thecaswells1@comcast.net); Francois, Matthew; Peter Caswell
Subject: [EXTERNAL] Hidden Falls Regional Extension Project

To whoever it may concern,

A script of the call in on Thursday Afternoon from Jackie Caswell who resides at 6599 Curtola Ranch Road is attached below.

Peter & Jackie Caswell
6599 Curtola Ranch Road

CC. Matthew Francios
Rutan & Tucker, LLP

My name is Jackie Caswell and I live at 6599 Curtola Ranch Road

I72-1 | The first thing I would like to point out is that the discussion of Hidden Falls is not in any way shape or form related to essential government business. Speakers are all at a significant disadvantage in a virtual setting. I cannot take part in this discussion at my house because of very poor internet connection so I am putting myself and my hosts at risk by coming to a neighbor's house in order to attend.

I72-2 | I have read the SEIR and it seems highly abbreviated, and not detailed or specific regarding either the impacts executing the plan would have, nor any remediation efforts that would mitigate those impacts. No costs have been addressed, no in-depth studies have been done, and no other federal and state agencies have been consulted despite clear impacts on resources within their regulatory control. I live right next to the property at the end of Curtola Ranch Road where you want to put a large parking lot and buildings and a helicopter pad, and that impact is quite apparent to me.

I72-3 | I have many areas I could cover today but can only address one in the time I have – I've chose to talk about wildlife. This is an area with documented evidence of the following animals:

- Both Mallards and Canada Geese, nest and raise their young in this meadow and are both migratory birds, so any change to this habitat requires analysis and mitigation pursuant to federal law.
- Wood ducks live year-round in the pond next to the proposed parking lot. They are threatened because of the loss of wetlands and associated habitat. The SEIR is silent on this issue.
- Tricolored Blackbirds nest and live in this meadow. They are protected under State Law. This has to be addressed fully. I have contacted the Audubon Society about this issue.
- Osprey, White Egrets and Blue Heron live, nest, and raise their young here. They are migratory birds and again any change in their environment is of interest to federal and state agencies.
- This is an area where Yellow Legged Tree Frogs are found. They are protected and no in-depth study has been done as to the adverse impacts of the project on their habitat.
- I've personally seen River Otters in the lakes, streams and ponds next to the proposed parking lot. I have contacted the Wildlife Conservation Society and the National Wildlife Federation on this issue.

I72-3
Cont'd



- There is an abundance of other wildlife in this area. Bobcats, coyotes, foxes, Grebes, and Bufflehead Ducks to name but a few. The destruction of wildlife corridors for these and other species needs detailed study and mitigation under CEQA.
- In order to complete a correctly structured EIR, a detailed study of each and every one of these topics must be completed by law, but no such studies appear to have been done. These studies must be done properly in coordination and consultation with the appropriate State and Federal authorities.
- Although it is only my opinion, it would seem to me that the Board of Supervisors would not want to be involved in any activities that break either State or Federal Law

Finally, I would like to inform you that you will be receiving a detailed written comment letter from our lawyers at Rutan & Tucker in the next few days on this, and other issues

RESPONSE TO COMMENT LETTER I72: JACKIE CASWELL

Response to Comment I72-1

The commenter has concerns about the public outreach process.

Please see Master Response 1 – Public Comment Process.

Response to Comment I72-2

The commenter believes the Draft SEIR is abbreviated.

The Draft SEIR has been prepared pursuant to the requirements of CEQA, the potential impacts have been thoroughly analyzed, and appropriate mitigation measures have been proposed. No further response is required.

The commenter states that no costs have been addressed.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

The commenter states that no in-depth studies have been done.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. In reviewing Draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204). No further response is required.

The commenter states that no other federal and state agencies have been consulted despite clear impacts on resources within their regulatory control.

Please see the Draft SEIR “Appendix A Scoping Report with Notice of Preparation (NOP),” 4.0 “Project Approvals,” and specifically 4.2 “Approvals Issued by Other Agencies” as provided below:

4.2 Approvals Issued by Other Agencies

The proposed project would require the following actions by entities other than Placer County:

- ▶ Clean Water Act Section 404 permit amendment for stream crossings at Raccoon Creek and other streams (United States Army Corps of Engineers [USACE]);
- ▶ Endangered Species Act Section 7 Consultation (United States Fish and Wildlife Service);
- ▶ Clean Water Act Section 401 Water Quality Certification amendment (Regional Water Quality Control Board – Central Valley Region);

- ▶ Clean Water Act Section 402 National Pollutant Discharge Elimination System permit (Regional Water Quality Control Board – Central Valley Region);
- ▶ Streambed Alteration Agreement amendment for stream crossings (California Department of Fish and Wildlife); and
- ▶ Encroachment permit for any construction within the floodplain of Raccoon Creek (Central Valley Flood Protection Board).

Response to Comment I72-3

The commenter is concerned about impacts on wildlife.

Please see the Draft SEIR Chapter 12.0 “Biological Resources” and specifically Section 12.4 “Impacts” for a detailed analysis of impacts on wildlife. Also, the Draft SEIR includes implementation of the following mitigation measures aimed at the avoidance, minimization and mitigation of impacts on biological resources:

Mitigation Measure S12-1: Implement Measures to Protect Aquatic Habitats and the Native Fish Community

Mitigation Measure S12-2: Replace, Restore, or Enhance Affected Jurisdictional Waters of the United States and Waters of the State.

Mitigation Measure S12-3: Implement Measures to Protect California Red-Legged Frog

Mitigation Measure S12-4: Implement Measures to Protect Foothill Yellow-Legged Frog and Northwestern Pond Turtle

Mitigation Measure S12-5: Implement Measures to Protect Raptors and Other Nesting Birds

Mitigation Measure 12-6: Implement Measures to Protect Ringtail and Townsend’s Big-Eared Bat

2.7.73 LETTER I73



Matthew D. Francois
Direct Dial: (650) 798-5669
E-mail: mfrancois@rutan.com

Letter I73

May 19, 2020

VIA E-MAIL [cdraecs@placer.ca.gov] AND
OVERNIGHT DELIVERY

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

Re: Hidden Falls Regional Park Trails Expansion Project Subsequent
Environmental Impact Report (State Clearinghouse No. 2007062084)

Dear Ms. Herrington:

I73-1 We appreciate this opportunity to submit comments on the proposed Hidden Falls Regional
Park Trails Expansion Project (the "Project"). We write on behalf of our clients, Peter and Jacqueline
Caswell, who own land located at 6599 Curtola Ranch Road. The Caswells' property is immediately
adjacent to the proposed parking and trail access for the proposed Harvego Bear River Preserve
("Harvego"). The Caswells have significant concerns with the adequacy of the Subsequent
Environmental Impact Report ("SEIR") prepared by Placer County (the "County") for the Project.

I73-2 As you know, the California Environmental Quality Act ("CEQA") calls for public review
and comment on environmental documents, such as the SEIR, to assure that the environmental
impacts of proposed projects are accurately identified, fully evaluated in conformity with established
plans and policies, and adequately addressed through the imposition of feasible mitigation measures
and/or the adoption of feasible alternatives. In light of CEQA's important public policies and
concerns, we submit the following comments on the SEIR.

As detailed below, the SEIR (1) is an improper subsequent environmental document and
should have been prepared as a stand-alone EIR, (2) fails to analyze the impacts of the "whole of the
project," as required by CEQA, (3) fails to adequately analyze the Project's significant traffic, air
quality, noise, and other impacts, (4) improperly defers mitigation, (5) fails to analyze a reasonable
range of alternatives to the Project, and
(6) omits a detailed discussion of cumulative impacts.

We respectfully request that these comments and questions be addressed, and that a new,
more comprehensive EIR be prepared and circulated for public review and comment prior to any
County action on the Project.

Rutan & Tucker, LLP | 455 Market Street, Suite 1870
San Francisco, CA 94105 | 650-263-7900 | Fax 650-263-7901
Orange County | Palo Alto | San Francisco | www.rutan.com

2783/036136-0001
14978719.4 a05/19/20

Shirlee Herrington
May 19, 2020
Page 2

I. Hidden Falls Regional Park and its surroundings are already severely stressed by the County's failure to adequately manage visitors and will become even more so as a result of the Project.

The County owns and operates Hidden Falls Regional Park ("HFRP") located northwest of the City of Auburn. HFRP originally opened in 2006 with about 221 acres and subsequently added another 979 acres in 2013. It contains approximately 30 miles of natural-surface, multi-use trails, restrooms, drinking fountains, and picnic areas with public parking provided via Mears Place. Establishment and operation of the existing park was evaluated in an EIR and regulated through a conditional use permit approved by the County's Planning Commission in 2010.¹

I73-3

Since opening to the public in 2013, HFRP has grown in popularity and visitation. (SEIR, p. 3-4.) Beginning in 2014, the parking area at Mears Place had become congested on weekends and during good weather, causing hundreds of cars to overflow onto area streets, including Mears Drive and Mt. Vernon Road. (SEIR, p. 3-18.) Some three years later, the County established a reservation system to try and help regulate parking on weekends and other high use days. (*Id.*) Unfortunately, the County's attempt to solve the current parking problems have not been successful, as acknowledged at the May 14, 2020 hearing to receive comments on the SEIR.

Presently, the County is considering expanding HFRP onto approximately 2,765 acres of land owned in fee or held in easement by the Placer Land Trust ("PLT") and/or the County. The trail expansion area has few roads and includes expansive undeveloped lands within the Raccoon Creek and Bear River watersheds. (SEIR, p. 3-5.) The area is characterized by blue oak woodland and oak-foothill pine woodland. (*Id.*) The land surrounding the trail expansion areas consists of rolling hills and is comprised primarily of private lands used for agriculture, grazing, and rural residences. (*Id.*)

The proposed expansion lands are comprised of various ranches or preserves. The largest, Harvego (1,773 acres), is a working cattle ranch located approximately four miles from the existing HFRP. Access to the Harvego expansion area is proposed through private roads, Auburn Valley Road and Curtola Ranch Road.² While the County and PLT have an easement to use Curtola Ranch Road for a minimal number of docent-led tours per year,³ the easement expressly precludes any

¹ Even though the Planning Commission approved the original use permit, we understand that the Commission may be stripped of approval authority over the Project. Such an action would plainly violate the County Code, which vests the Commission, and the Commission alone, with initial approval authority over a conditional use permit. (Placer County Zoning Code ["PCZC"] § 17.58.130.)

² The SEIR states that access to Auburn Valley Road will be provided by an offer of dedication that the County has not accepted to date. No supporting documentation is included in the SEIR to support this claimed means of access.

³ By letter agreement dated June 7, 2011, PLT also agreed to limit the use of the easement to small group tours, not exceeding 12 per year.

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↑ public use until the road is improved from a dirt road to an all-weather roadway surface of not less than 20 feet in width. Public use of the access easement is also predicated on the completion of an operations, management, and restoration plan for the property.

The SEIR acknowledges that per the terms of the easement, general public use of Curtola Ranch Road is allowed only after the road is widened. (SEIR, p. 3-36.) However, the Project proposes to allow public use in Phase 2 prior to widening of the road to 20 feet and states that as part of Phase 3, Curtola Ranch Road will be widened “except for over an existing dam, where staging locations at each end of the one-lane section would be available to allow waiting cars to yield to oncoming cars.” (SEIR, pp. 3-35 to 3-36.) The easement does NOT contain any exceptions to widening for the dam area. The proposed one-way access is unsafe and fails to comport with accepted fire and emergency access standards.

Taylor Ranch (321 acres) has an existing 3.5 mile loop trail that also connects to an existing 2.5 mile loop trail on the 160-acre Kotomyan Preserve. (SEIR, p. 3-6.) According to the SEIR, approximately 11 acres of land and/or easements were purchased that connect the existing HFRP with Taylor Ranch. (SEIR, p. 3-9.) Liberty Ranch (313 acres) is a privately-owned cattle ranch with no existing trails. (SEIR, p. 3-6.) PLT holds a conservation easement on the Liberty Ranch property and the County has a dedicated 15-foot wide trail easement on the land. (*Id.*) The Outman Preserve (80 acres) also has no existing trails. (SEIR, p. 3-9.) The Twilight Ride property is comprised of two parcels totaling approximately 50 acres located east of Taylor Ranch. The County has been in negotiations to purchase this land since 2018. (SEIR, p. 3-10.)

Physical improvements include construction of:

- 30 miles of additional multi-use trails, including two new major bridges over Raccoon Creek,⁴ 15 trail bridges, 30 stream ford crossings, 20 culvert crossings and three scenic overlooks;
- three new access points, including access road improvements and paved parking for nearly 300 additional vehicles (120 spaces at Harvego, 102 at Twilight Ride, 50 at Garden Bar, and 25 at Mears) and 68 horse trailers (38 at Twilight Ride, 20 at Garden Bar, and 10 at Harvego);
- two restroom buildings and associated septic systems;
- two groundwater wells;
- three, 12,000 gallon water tanks with fire hydrants;

⁴ One of the bridges will have a span of approximately 128 feet long and 10 feet wide, requiring support from two intermediate center columns. (SEIR, p. 3-17.) The other bridge is planned as a pre-manufactured steel truss bridge measuring approximately 100 feet long and 12 feet wide. (*Id.*)

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- two helipads;
- 12 picnic areas;
- three kiosks;
- signs and fencing;
- interpretative displays;
- fish and wildlife habitat restoration;
- trash receptacles;
- entry gates and ranger kiosk;
- landscaping and irrigation; and
- equestrian facilities (horse watering facilities, hitching posts).

(SEIR, pp. 3-11 to 3-13, 3-48.) Allowed uses within the Project area would include recreational use, grazing, agriculture, outdoor education, organized events (e.g., cross country track meets, docent led tours), film & theater production, fishing, and deprecation hunting. (SEIR, p. 3-12.) In Phase 1C, “informal” parking will be provided to accommodate special events for up to 200 persons. (SEIR, p. 3-24.)

I73-4

II. The SEIR fails to comply with CEQA.

A. The County should have prepared an EIR (not a subsequent EIR) for the Project.

A subsequent EIR is only appropriate when there are changes in a project or circumstances under which it will be undertaken that require major revisions of the EIR to address new or substantially more severe impacts. (Public Resources Code § 21166; CEQA Guidelines § 15162.) Here, the Project is separate and distinct from the relatively minor park expansion examined in the 2010 EIR. Thus, the County erred in preparing the SEIR instead of an EIR.

A decision to proceed under CEQA’s subsequent review provisions must . . . necessarily rest on a determination . . . that the original environmental document retains some informational value.” (*Friends of College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.5th 937, 953 [further noting that an agency’s determination to proceed under CEQA’s subsequent review provisions must be supported by substantial evidence].) The 2010 EIR prepared

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↑ more than 10 years ago for the existing park is not relevant to the substantial park expansion proposed by the Project.

The Project increases the park size by over 200 percent. All of the proposed expansion areas are geographically separate (some by four miles or more) from the existing park. Entirely new staging areas and facilities are proposed as part of the Project. The 2010 EIR does not contain any informational value that is useful to the analysis of Project impacts. For instance, it did not analyze impacts related to vehicle miles traveled (“VMT”), GHG emissions, wildfire, or tribal cultural resources. A new General Plan was adopted by the County in the meantime. The SEIR contains no explanation as to how or why the 2010 EIR provides any informational value in regard to the Project.

I73-4
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The SEIR describes the Project as requiring a use permit modification. (SEIR, p. 3-49.) At the May 14, 2020 hearing to receive comments on the SEIR, Staff described the approval as a new permit that would supersede the old one. Staff’s representation, which we believe to be accurate, further undermines the County’s reliance on an SEIR. The Project involves a new permit—not a modification to an old one—and thus requires a new EIR.

The prior EIR is wholly irrelevant to the decisionmaking process concerning the Project. Thus, the County erred in relying on a SEIR. The document should be revised and reformatted as a stand-alone EIR and recirculated for public review. (*Friends of the College of San Mateo Gardens, supra*, 1 Cal.5th at 952, fn. 2.)

B. The SEIR does not provide a full and accurate description of the Project.

I73-5

An accurate and complete project description is necessary for an intelligent evaluation of the potentially significant environmental impacts of the agency’s action. (*Silveira v. Las Gallinas Valley Sanitary Dist.* (1997) 54 Cal.App.4th 980, 990.) “Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal . . . and weigh other alternatives in the balance.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193 [court further observes that an accurate, complete and consistent project description is the sine qua non of informative, legally adequate CEQA review].)

CEQA Guidelines Section 15126 further makes clear that an EIR must take a comprehensive review of the proposed project *as a whole*. “All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation.” (CEQA Guidelines § 15126.) This requirement reflects CEQA’s definition of a “project” as the “*whole of an action*” that may result in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change. (Public Resources Code § 21065; CEQA Guidelines § 15378.)⁵

⁵ Unless otherwise noted, emphasis in quotations herein is supplied and citations are omitted.

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The Project involves paving and widening of approximately 3,600 feet of Curtola Ranch Road from a rural, gravel driveway to a standard County roadway. The SEIR did not consider all of the aspects associated with such construction, including heavy grading, oak tree removal, enlargement of an existing earth dam, construction of a new bridge, fill of wetlands, diversion of riparian areas, and loss of potential habitat for special status species. This construction has the potential to result in significant impacts to air quality, biological resources, noise, traffic, geology, hydrology, and GHG emissions. Yet none of these issues are addressed by the SEIR.

As noted by the May 19, 2020 letter from Milani & Associates, attached hereto as Exhibit A (the “Milani Report”), the Project will actually result in the need for a 30 foot roadway width to meet engineering and operational standards.⁶ (Milani Report, p. 2.) The soils at the existing road most likely have not been adequately compacted to meet County requirements. There is also a good chance that portions of the soils along the canal are saturated. As such, major portions of the existing road will have to be excavated, replaced, and compacted.

The roadway would have to be constructed adjacent to an existing Nevada Irrigation District (“NID”) canal for approximately 1,400 feet. (Milani Report, p. 1.) The canal is not even shown on proposed grading plans. (SEIR, p. 5-19.) Construction of this portion of roadway would require construction of a fill slope to support the westerly road widening. (Milani Report, p. 3.) Milani estimates that this stretch alone will require approximately 30,000 cubic yards of grading. (*Id.*) Milani further observes that “[i]mpacts to existing habitat and wetlands appear extensive in this reach.” (Milani Report, p. 4.)

The proposed road will have to cross an approximately 300 foot long dam. This earthen dam does not appear to have been engineered or designed to support the required fire traffic loads. The dam will most likely have to be completely removed and reconstructed. (*See, e.g.*, General Plan, Policy 8.B.4 [requiring that the design and location of dams and levees be in accordance with applicable design standards and specifications and accepted state-of-the-art design and construction practices].) At minimum, the dam will also have to be widened to accommodate the improved roadway. Such widening will require approximately 7,000 cubic yards of grading and significantly encroach into adjoining wetlands, riparian areas, and/or potential habitat for special status species. (Milani Report, p. 5.)

Additionally, a new bridge will need to be constructed at the terminus of the road to cross an existing drainage channel. In total, the Harvego improvements *alone*—the road plus the three acre parking field—would likely result in the need for more than 80,000 cubic yards of grading. *This is*

⁶ The County has an easement for the existing gravel road, which varies between 10 and 12 feet in width. It needs a dedicated road right-of-way of 30 plus feet plus additional slope easements to support the road improvements. Is the County planning to condemn the land necessary to make the road improvements for the Project? If so, this should be listed as yet another discretionary approval needed for the Project.



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I73-5 ↑ Cont'd **more than fifteen times the amount of grading assumed in the SEIR.** (See Table 5-1 at SEIR, p. 5-18.) This gross underestimation undermines many, if not most, of the SEIR's impact conclusions.⁷

I73-6 While included in the Project Description, the SEIR does not analyze the environmental impacts associated with special events for up to 200 attendees. (SEIR, pp. 3-24 to 3-26.) It also does not analyze the impacts associated with cross country track meets, film & theater production, or outdoor education classes. (SEIR, p. 3-12.) Further, it does not analyze the security or other risks posed by introducing a great number of visitors (many of which are from outside the area) into an area near rural residential uses. This risk is increased by the fact that there are no clear boundaries between County land and private land.

I73-7 The SEIR envisions future development of additional trails within the PLT-owned parcels. "These trails could be added in the future in areas where the County's trail easements are 'blanket' in nature." (SEIR, p. 3-16.) Specifically, future trails could be constructed to provide connectivity with the Bear River and recently constructed BLM trails located north of Harvego. (*Id.*) Additional trails and associated amenities may be developed for visitors with physical handicaps. These additional trails and amenities are reasonably foreseeable consequences of the Project. As such, they are required to be analyzed in the SEIR, but were not.⁸ (*Laurel Heights Improvement Ass'n v. Regents of University of California* (1988) 47 Cal.3d 376 [EIR found inadequate for describing project as occupying only part of a building even though university had plans to occupy the entire building].)

I73-8 The Project Description is also inadequate as it fails to list several discretionary approvals needed for the Project. (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899 [agency erred by failing to include development agreement in list of project approvals].) For instance, it does not mention the NID canal runs along Curtola Ranch Road. At minimum, an encroachment permit or related approval would be needed from NID. Approvals or permits would also be needed for the County to rely on NID water for fire suppression as stated in Mitigation Measure 11-3. In addition to the use permit approval, other approvals, such as grading permits, building permits, tree removal permits, well permits, amendments to Williamson Act contracts, and deviations from County Road Standards may be needed for the Project.⁹ (SEIR, pp. 11-10, 12-38.) Additionally, an authority to construct permit would be needed from Placer County Air Pollution Control District ("PCAPCD") and a land use permit for the helipads would be needed

⁷ The Milani Report examined the necessary grading and related impacts for Harvego. We believe that a detailed geotechnical investigation of Twilight Ride, Mears Road, and Garden Bar 40 would likewise reveal the need for much more grading and thus more significant environmental impacts.

⁸ The SEIR inconsistently states that it evaluates these features, while also noting that these features are not addressed in the SEIR. (SEIR, p. 3-16.)

⁹ For instance, the Williamson Act applicable to the eastern-most Harvego land restricts the use of that land to agricultural and related pursuits.

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I73-8 ↑ from the State Department of Transportation, Division of Aeronautics. (SEIR, p. 9-29; PCZC Cont'd § 17.56.040(B)(2).)

I73-9 Finally, the SEIR also states that it is available for review during normal business hours at the Auburn Library, Lincoln Library, and County offices. (SEIR, p. 1-6.) But such facilities have been closed since at least March 19, 2020, when the Governor issued a statewide shelter in place order. Thus, the SEIR has not been made publicly available for the full comment period, as required by CEQA. (CEQA Guidelines § 15087(g); PCZC § 18.20.050(B)(5).)

C. The SEIR fails to acknowledge and address numerous significant environmental impacts.

1. Land Use and Agricultural Resources

a. Conflict with Williamson Act Contracts

I73-10 The Harvego Preserve is home to a working cattle ranch, and the Taylor Ranch, Kotomyan Preserve, and Outman Preserve also support cattle grazing.¹⁰ It appears that more than two-thirds of the Project area lands, including Harvego, Liberty Ranch, and Taylor Ranch, are under Williamson Act contracts. (SEIR, p. 4-9; *see also* SEIR, p. 4-13 [acknowledging that “large portions of the project area are under active Williamson Act contracts.”])

Even though the majority of the Project area is covered by Williamson Act contracts, the SEIR contains NO analysis of the Project’s potential to conflict with such contracts. The County’s Williamson Act Ordinance includes a list of activities compatible with contracted lands. Parks, trails, equestrian facilities, heliports, parking lots, restrooms, and associated facilities are not among the list of activities deemed compatible with contracted lands. (PCZC § 17.64.090, Table 2.) The fact that PLT has stated publicly that it will continue cattle grazing on a certain portion of the Project site¹¹ does not negate the fact that the Project uses are incompatible with Williamson Act contracts.

b. Conflict with Agricultural Zoning

I73-11 The SEIR fails to analyze and address the Project’s conflict with zoning for agricultural use. The Project area is zoned Farm. The purpose of the Farm zone is to “provide areas for the conduct of commercial agricultural operations that can also accommodate necessary services to support agricultural uses, together with residential land uses at low population densities.” (PCZC § 17.10.010.A) Parks/playgrounds/golf courses and rural recreation uses are allowed with a use permit. (PCZC § 17.10.010.B.)

¹⁰ The Harvego property is also used for bee keeping. (Placer County Property Assessment Bruin Ranch “Phase 1” Baseline Documentation Report [“Phase 1 Report”], p. 2.) The Phase 1 Report is included in Appendix B to the SEIR.

¹¹ (SEIR, pp. 4-2, 4-12, 4-13.)

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Parks/playgrounds/golf courses are defined as “public and private parks, play lots, playgrounds and athletic fields (nonprofessional); golf courses . . . ; bathing beaches, bathhouses and public restrooms; rollerblade parks . . . ; [and] outdoor amphitheaters without fixed seating.” (PCZC § 17.04.030.) Rural recreation uses include facilities for special group activities such as outdoor archery, pistol, rifle and seek clubs; dude and guest ranches; health resorts; water ski/wakeboard lakes and clubs; and hunting and fishing clubs. (*Id.*)

None of the Project uses could be characterized as rural recreation uses. Under common rules of statutory construction, “public and private parks” must be construed with the other items listed. (*1901 First Street Owner, LLC v. Tustin Unified School District* (2018) 21 Cal.App.5th 1186, 1194 [under the rule of statutory construction known as *noscitur a sociis*, “a word takes meaning from the company it keeps.”].) None of those items relate to rural recreational uses like trails, overlooks, bridges, or associated features. Parking lots, helipads, and large water tanks likewise do not qualify as “parks” and are not allowed uses. (PCZC § 17.06.030(A)(1).) The Project thus conflicts with the sites’ agricultural zoning.

Moreover, several of the parcels do not meet the minimum lot size requirements. For instance, Outman Preserve is 80 acres, but has a minimum lot size of 160 acres. (SEIR, pp. 3-9, 4-6.) The Haddad/Campbell/Louden land, also referred to as the “Connectivity Parcels,” has a minimum lot size of 40 acres, but the proposed trails comprise only approximately 11 acres. (SEIR, pp. 3-9, 4-6.) The Garden Bar 40 parcel also has a minimum lot of 40 acres, but appears to be much smaller.¹² (SEIR, p. 4-6.) Per the County’s Zoning Code, each parcel proposed for a development or a new land use, must comply with the minimum parcel size requirements. (PCZC §§ 17.10.010.C, 17.54.040.)

c. Convert Farmland to Non-Agricultural Use

I73-12

The Project area is designated as Farmland of Local Importance. (SEIR, pp. 4-7 to 4-8.) Farmland of Local Importance is land that either is currently producing crops or has the capability of production. (SEIR, p. 4-7.) The SEIR claims that constructing recreational facilities would not result in or encourage the conversion of any surrounding farmland to nonagricultural use “as outdoor recreation is compatible with agriculture in Williamson Act documentation . . .” (SEIR, p. 4-14.) The Project will result in the conversion of farmland to nonagricultural use. Those lands will not be able to be used for grazing or other agricultural activities. There is no assurance or guarantees that cattle grazing or other agricultural activities will continue on the Project site. Increased public use of the lands makes that prospect very unlikely. The County allowed cattle grazing leases to expire on the existing park lands in 2013. (SEIR, p. 4-15.) And, as noted above, the Project uses are NOT compatible uses of Williamson Act contracted lands.

¹² Other properties, including Kotomyan Preserve and Twilight Ride, just meet the minimum lot size requirements assuming that the acreage information provided in the SEIR is accurate. (SEIR, pp. 3-8, 3-10, 4-6.)

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d. Conflict with Policies Adopted to Avoid or Mitigate Environmental Effects

The Project results in significant but unacknowledged impacts with respect to the Project's conflict with land use policies adopted for the purpose of avoiding or mitigating environmental impacts. (CEQA Guidelines, Appendix G, Section X.b; *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903.) The SEIR contains NO analysis of the Project's conflicts with land use policies adopted for the purpose of mitigating environmental impacts, even though analysis of that topic is required by CEQA and it is identified as a significance criterion.¹³ Typically a chart or table of such policies is included in an EIR's land use section. No such chart or table is included in the SEIR.

I73-13

The Project lands have a General Plan designation of Agriculture/Timberland-80 Acre Minimum. (General Plan, Figure 1-2.) The Agricultural designation allows for agriculture and related uses. (General Plan, p. 11.) Typical land uses allowed include: crop production, orchards and vineyards, grazing, pasture and rangeland, hobby farms; other resource extraction activities; facilities that directly support agricultural operations, such as agricultural products processing; and necessary public utility and safety facilities. (*Id.*) Nowhere in this designation does it indicate that parks, trails, or other uses are allowed.

The Timberland designation is applied to mountainous areas of the County where the primary land uses relate to the growing and harvesting of timber and other forest products. (General Plan, p. 12.) Per Goal 7.E, the County must conserve forest resources, enhance the quality and diversity of forest ecosystems, reduce conflicts between forestry and other uses, and encourage a sustained yield of forest products. The County shall encourage the sustained productive use of forest land as a means to provide open space and conserve other resources and discourage development that conflicts with timberland management. (Policies 7.E.1 and 7.E.2.)

In regard to agriculturally-designated lands, the County's established goals are to: (1) provide for the long-term conservation and use of agriculturally-designated lands; (2) minimize existing and future conflicts between agricultural and non-agricultural uses in agriculturally-designated areas; (3) protect and enhance the economic viability of the County's agricultural operations; and (4) maximize the productivity of the County's agriculture uses by ensuring adequate supplies of water. (Goals 7.A, 7.B, 7.C, and 7.D.) Implementing policies call for the County to protect agriculturally-designated areas from conversion to non-agricultural uses; encourage continued and increased agricultural activities on lands suited to agricultural uses; identify and maintain clear boundaries between agricultural and non-agricultural uses with appropriate land use buffers between such uses; and support efforts to deliver adequate surface water to agricultural uses and work with local irrigation districts to preserve local water rights. (Policies 7.A.1, 7.B.1, 7.D.1, 7.D.5.)

¹³ While land use related policies are cited in this section, other environmental-policies are cited and discussed in the appropriate sections below.

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Per Policy 1.H.1, the County is to “maintain agriculturally-designated areas for agricultural uses and direct urban uses to designated urban growth areas and/or cities.” The County is also to seek to ensure that new development and public works projects do not encourage expansion of urban uses into designated agricultural areas. (Policy 1.H.2.) The County shall allow “the conversion of agricultural land to urban uses *only* within community plan or specific plan areas, within city spheres of influence, or where designated for urban development on the General Plan Land Use Diagram.” (Policy 1.H.4.)

Contrary to these goals and policies, the Project would convert lands designated for agricultural and timberland purposes to non-agricultural and non-timberland purposes. There is no binding commitment to maintain agricultural uses on the land nor any assurance that appropriate boundaries and buffers will be maintained between the two. The Project would use groundwater supplies for a non-agricultural use and may adversely impact surface supplies as well. The Project area is not designated for urban uses or development on the General Plan Land Use Diagram.

Most of the policies cited in the regulatory setting section of the SEIR derive from the Recreation and Cultural Resources Element of the SEIR. The Project area is NOT designated for regional parks and trails. Even if it were designated for recreational uses, the Project would conflict with several key policies: Policy 5.A.11 [“regional and local *recreation facilities should reflect the character of the area* and the existing and anticipated demand for such facilities.”]; Policy 5.A.12 [“*The County shall encourage recreational development that complements the natural features of the area*, including topography, waterways, vegetation, and soil characteristics.”]; and Policy 5.A.13 [“*The County shall ensure that recreational activity is distributed and managed according to an area’s carrying capacity*, with special emphasis on controlling adverse environmental impacts, conflict between uses, and trespass.”].)

In addition to the SEIR being deficient for failing to identify the Project’s conflicts with policies as significant impacts, the Project cannot be approved by the City because it conflicts with fundamental, mandatory, and clear policies of the City’s General Plan. (*Spring Valley Lake Assn. v. City of Victorville* (2016) 248 Cal.App.4th 491; *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777; *California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603.) Due to such inconsistencies, any such approval of the Project by the City would be void *ab initio*. (Gov. Code § 65860(a); *Leshner v. Communications v. City of Walnut Creek* (1990) 52 Cal.3d 531.)

2. Soils, Geology, Seismicity, and Mineral Resources

I73-14

The SEIR acknowledges that some slopes within the Project area could be prone to sliding or slumping because gradients reach 70 percent in some areas. (SEIR, p. 5-11.) Instead of analyzing potential impacts and imposing mitigation for them, the SEIR ignores such impacts. Specifically, it claims that because “the trail alignment would be routed in a manner to provide physical and ecological sustainability, and the proposed parking lots and entry improvements are planned in areas

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↑ that are relatively flat, and no areas of shallow slope instability are known to occur, the project would not result in exposure of structures or people to landslides.” (SEIR, p. 5-30.) This is not correct as noted by the discussion of Curtola Ranch Road improvements above and the fact that the topography of the sites range from 500 to 1,613 feet above mean sea level. (SEIR, p. 5-2.) The SEIR also improperly defers analysis of impacts by stating that trail alignment, bridge location, and placement of overlooks “would be subject to micro siting during final design in order to avoid sensitive natural resources and to provide sustainable trail design . . .” (SEIR, p. 5-30.)

Because soils in the Project area consist of a shallow soil horizon underlain by bedrock, they are generally unsuitable for conventional septic systems. (SEIR, p. 5-9.) The SEIR nonetheless concludes that preliminary tests found areas suitable for a “pretreatment septic system” at each of the proposed parking areas. (SEIR, p. 5-31.) The SEIR does not explain the meaning of a pretreatment septic system or how the testing results demonstrate areas suitable for use of septic systems. Thus, there is no substantial evidence to support the SEIR’s conclusion that impacts related to septic systems will be less than significant.

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. In landslide hazard areas, the County is to prohibit avoidable alteration of land in a manner that could increase the hazard, including concentration of water through drainage, irrigation, or septic systems; removal of vegetative cover; and steepening of slopes and undercutting the bases of slopes. (Policy 8.A.5; see also Policy 8.A.11 [County shall limit development in areas of steep or unstable slopes to minimize hazards caused by landslides or liquefaction].) Contrary to General Plan Policies 8.A.1 and 8.A.4, there is no mitigation requiring further investigation of the identified geologic landslide hazard and incorporation of appropriate design provisions to prevent such slides.

3. Cultural and Trial Cultural Resources

I73-15

Under CEQA, a project significantly impacts a historical or archaeological resource if it causes a substantial adverse change in the significance of it. (CEQA Guidelines § 15064.5(b).) The SEIR dismisses the potential impacts to two identified “historic-era” resources—Rock Walls (HF-2016-1) and Water Conveyance Ditch and Stacked Rock Wall (HF-2017-1) by concluding that they are not “significant cultural resources.” (Impact 6-1 at SEIR, pp. 6-18 to 6-19.) The phrase “significant cultural resources” does not exist under CEQA. The SEIR should have assumed the resources were historical resources, and analyzed the Project’s potential to impact them.

“Evidence of historic Native American habitation includes several grinding holes and other archaeological sites spread across the [Harvego] property, including the presence of Nisenan, Maidu, and Martis peoples.” (Phase 1 Report, 2.) According to the Phase 1 Report, a Cultural Assessment Report detailing more complete historic and cultural resources is on file at the offices of PLT. (*Id.*) Yet, neither this report nor the resources it identified are mentioned in the SEIR.

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The lode gold mine on the Taylor Ranch property was not analyzed as a potential historic resource. Per the SEIR, this feature will be removed if it located in close proximity to a Project facility. (SEIR, p. 14-15.) Assuming that this is a historic resource, the Project may significantly impact it.

The SEIR finds that the Project has the potential to disturb undiscovered cultural resources. The SEIR states that implementing Mitigation Measure 6-2 would reduce this impact to a less than significant level. (SEIR, p. 6-20.) But there is no explanation of how these measures will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)

The SEIR acknowledges that the Project may significantly impact tribal cultural resources. (Impact 6-4 at 6-21 to 6-22.) It states that a cultural resource was located on the Twilight Ride parcel but was determined to be “well outside the project development zone.” (SEIR, p. 6-22.) Is this resource referred to as the shallow mortar (MF1) on page 6-10 of the SEIR? If not, the SEIR does not analyze the Project’s potential to impact that resource.

While acknowledging that new ground disturbance could have a potentially significant impact on tribal cultural resources, the SEIR concludes that implementation of Mitigation Measure S6-4 will reduce this impact to a less than significant level. That measure merely provides for tribal access post grading and prior to public access. The impacts will have already occurred and the proposed minimization strategies of avoiding the resource or treating it with culturally appropriate dignity will be of limited efficacy. This measure is substantially similar to the measure recently struck down by the Second District Court of Appeal as inadequate to avoid or mitigate significant impacts to a tribal cultural resource. (*See Save Agoura Cornell Knoll v. City of Agoura Hills* (2020) 46 Cal.App.5th 665, 686-690.)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Goal 5.D of the County’s General Plan calls on the County to identify, protect, and enhance the County’s important historical, archaeological, paleontological, and cultural sites as well as their contributing environments. Implementing policies require the County to identify and protect cultural resources and to avoid potential impacts to them whenever possible. (Policies 5.D.6 and 5.D.7.) As the above analysis shows, these policies were not adhered to. Further, it does not appear that the SEIR’s analysis of the Project’s impacts was made by qualified consultant(s), as required by Policy 5.D.7.

4. Visual Resources

I73-16

For the analysis of visual impacts, the SEIR claims that four key observation points (“KOPs”) were selected. (SEIR, p. 7-4.) The KOPs are shown in Exhibits 7-2 through 7-5. (SEIR, p. 7-4.) For certain KOPs, the views depicted are not illustrative of Project site conditions. (*Cf.* SEIR, Exhibit 7-2 [view facing blind curve hundreds of feet from proposed parking lot] and Exhibit 7-3 [view facing the existing parking lot as opposed to the opposite direction where the parking lot addition is proposed].) Exhibit 7-9 lacks representative photographs of the smaller parking lot, the

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↑ ranger shack, and the necessary roadway expansion especially through what appears to be relatively heavy wooded area. None of the photographs for the Twilight Ride property show the key angle of the proposed parking area from Bell Road. (SEIR, Exhibit 7-5.)

The photographs of the “before” settings are flawed for the reasons explained above. Moreover, no “after” simulations were provided, as is typical. The SEIR summarily concludes that post-Project views would appear like views of existing structures in the Project area. (SEIR, p. 7-20.) In light of existing conditions and the proposed Project improvements, it defies logic to suggest that the Project will not result in a visual impact to these current conditions. (See, e.g., Exhibit 7-9 [depicting the bucolic field where the County is proposing to construct a 130-space parking lot, permanent restroom and septic leach fields, 12,000 gallon water tank, and helipad, among other features]; see also Exhibit 7-1b.)¹⁴ As such, there is no evidence, let alone substantial evidence as is required, to support the SEIR’s conclusion that Project impacts to visual resources will be less than significant.

Visual impacts to Garden Bar Road were discussed in the 2010 EIR. It was determined that there would be significant and unavoidable impacts to the visual resources associated with the improvements to Garden Bar Road at full build-out as road widening and corresponding oak tree removal would be required. (SEIR, p. 7-17.) The SEIR finds that the same significant unavoidable impact applies to the proposed parking and trail improvements at Garden Bar 40. To address the potential degradation of visual quality, it requires revegetation and restoration of disturbed areas (Mitigation Measure 7-1) and payment of fees into the County-approved Oak Woodland Preservation Fund (Mitigation Measure S12-7).

Even though similar impacts will occur along Curtola Ranch Road, no such impacts were identified or mitigation imposed. The SEIR acknowledges that “the aesthetics along segments of Curtola Ranch Road would be changed permanently from a narrow, gravel road to a 20-foot wide, paved road in order to safely accommodate vehicles,” noting that the road widening “would require encapsulation of a small canal, select tree and brush removal . . . and placement of soil to create a fill slope to support the expanded road width.” (SEIR, p. 7-21.)¹⁵ But the SEIR avoids finding a significant aesthetic impact by stating Curtola Ranch Road is not a scenic vista or state highway. (SEIR, p. 7-21.) ***This directly contradicts the SEIR’s claim that it is examining impacts to KOPs, including Curtola Ranch Road.*** (SEIR, p. 7-4.)

↓ The SEIR acknowledges that private views “may change substantially” as a result of the Project. (SEIR, p. 7-21.) It dismisses those impacts by claiming that it is not a threshold used by CEQA to determine impacts. Yet, the 2010 EIR considered views from adjacent residences, off-

¹⁴ The SEIR does not even mention certain of these features, like the water tanks, which alone have a reasonable probability of resulting in significant visual impacts.

¹⁵ Encapsulation of the NID canal is not feasible as discussed in the Milani Report. Even if it were, the impacts of such action are not analyzed in the SEIR. For instance, if the canal is covered, it will likely result in significant flooding impacts.

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↑ site locations, and the surrounding area. (SEIR, pp. 7-19, 7-20.) The approach taken by the County now conflicts with the approach taken then, and it appears solely designed to avoid identifying a new impact.

The SEIR relies on several measures to avoid significant aesthetic impacts. For instance the SEIR states that the County will avoid removing trees greater than five inches in diameter at breast height (“dbh”), construct facilities and structures of natural materials and colors, and use lighting that is low wattage and directed downward to minimize excess glare or skyglow. (SEIR, pp. 7-18 to 7-20, 7-22.) Contrary to CEQA, these measures are not imposed as legally-binding or enforceable mitigation measures. (CEQA Guidelines § 15126.4(a)(2).)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purpose of avoiding or mitigating environmental effects. Goal 1.K calls for protection of the visual and scenic resources of the County as important quality-of-life amenities for residents and a principal asset in the promotion of recreation and tourism. Policy 1.K.5 requires the County to minimize visual impacts associated with new road, parking, and utilities and calls for roadways and parking areas to be designed to conform to the natural terrain. Policy 1.K.6 requires new development on hillsides to employ design, construction, and maintenance techniques that maintain the character and visual quality of the hillside. As noted above, the Project proposes to place a 130-space parking lot on a hillside and is not designed to conform to the natural terrain or to maintain the character and visual quality.

5. Transportation and Circulation

a. Conflict with Plans or Programs Addressing the Circulation System

I73-17

The SEIR purports to analyze the Project’s potential conflicts with adopted programs, plans, ordinances, or policies addressing the circulation system in Impact 8-1 and 8-2. But the analysis under Impact 8-1 relates to construction traffic impacts. There is no analysis under Impact 8-2. Instead, the SEIR states that vehicle delay based on level of service (“LOS”) is no longer considered a significant impact under CEQA. (SEIR, p. 8-21.) Based on this statement, the SEIR concludes that the Project “does not conflict with any adopted program, plan, ordinance, or policy under existing plus project conditions.” (*Id.*) We believe that the statement is incorrect as noted below.

Conflicts with adopted programs, plans, ordinances, or policies addressing the circulation system are again addressed under Impact 8-4. But that analysis focuses on whether the proposed access points create any traffic safety hazards. Only a cursory analysis is provided of the Garden Bar 40 access. No analysis is provided of the Curtola Ranch Road entrance.

Access for Twilight Road is determined to have significant impacts. (SEIR, pp. 8-26 to 8-27.) Even with mitigation consisting of a tapered entrance and northbound left-turn lane, the Project still results in significant impacts that have not been acknowledged or addressed. Specifically, the

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I73-17 ↑ SEIR notes that an alternative access point and/or deviations from County standards may be needed
Cont'd ↓ due to line-of-sight issues. (SEIR, pp. 8-24 to 8-25.) An exception may also be needed for the left
turn lane design. (SEIR, p. 8-26.)

b. Trip Generation

“The current trip generation at Mears Drive parking area with the reservation system was compared to the number of available permits or parking supply and resulting trip generation were created on a ‘per permit’ basis.” (SEIR, p. 8-18.) No explanation is provided as to why trip generation was based on permits issued as opposed to actual counts. (SEIR, p. 8-16.) The reservation system only applies on weekends, not weekdays. There is no justification or explanation for why this methodology is reasonable or appropriate.

I73-18 The Project’s Saturday trip generation is estimated to be: 2,036 daily trips, of which 215 will be peak hour trips. (SEIR, pp. 8-16, 18-6.) More than half of these peak hour trips are attributed to the Harvego improvements. (SEIR, p. 10-22.) The Project’s weekday trip generation is estimated to be: 944 daily trips, of which 94 will be PM peak hour trips. (SEIR, pp. 8-17, 18-6.) These figures appear to be understated because at least some of the weekday data was conducted on a Friday as opposed to the typical Tuesday, Wednesday, or Thursday. (SEIR, Appendix D, p. 13.) Additionally, only one-third of the trips currently caused by turn-aways at Mears were factored into the analysis. (Table 8-5, note 4 at SEIR, p. 8-16.) Parking demand too appears to be understated. (SEIR, p. 3-47 [peak parking demand at Mears was reported to be 148 spaces; far fewer spaces will be provided at Garden Bar (50), Twilight Ride (102), and Harvego (120)].)

c. Level of Service

I73-19 The SEIR claims that LOS is not a significant impact citing *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609. (SEIR, pp. 8-2, 8-12.) But nothing in that case purports to absolve an agency from analyzing and treating as significant LOS impacts at least in the absence of an adopted VMT standard. The agency in that case had in fact prepared an EIR that examined LOS impacts. Moreover, agencies throughout the state are routinely preparing EIRs which reach significance conclusions based on LOS pending adoption of VMT standards by July 1, 2020.

The SEIR did not provide an explanation for omitting analysis of weekday AM peak period conditions. It did not analyze freeway volumes even though it acknowledges that the majority of weekend park visitors come from outside the County. (SEIR, p. 8-18.) It also confusingly examines segments of Auburn Valley Road that are mere hundreds of feet in length, *e.g.*, from Bell Road to View Ridge Drive and Fairway Court to Curtola Ranch Road.

The intersection of SR 49/Lone Star Road currently operates at LOS F. The Project will add more than 2.5 seconds of delay to this deficient intersection under both existing plus project and

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↑ cumulative plus project conditions.¹⁶ (SEIR, pp. 8-43, 8-51.) Under cumulative plus project conditions, the Project adds 54.5 seconds (nearly one minute) of delay to the intersection in the Saturday peak hour. (SEIR, p. 8-51.) The Project also causes the intersection of SR 49/Cramer Road to degrade from an acceptable LOS D to an unacceptable LOS E during the weekend PM peak under cumulative plus project conditions. Both the traffic study and SEIR describe this as a significant impact that cannot be mitigated, but the SEIR does not acknowledge it as a significant unavoidable impact. (SEIR, p. 8-52.)

d. Vehicle Miles Traveled

I73-20

Even based on likely deflated trip generation numbers, the SEIR acknowledges that the Project would result in a substantial increase in VMT over existing conditions. (SEIR, pp. 8-22, 18-7.) Specifically, the analysis indicates that the Project would generate 78,000 VMT on a peak Saturday. (*Id.*) The existing HFRP generates approximately 18,000 VMT on a peak Saturday. (*Id.*) By comparison, average daily VMT for Placer County (excluding the Tahoe Basin) is projected to be 11,360 VMT in 2020. (SEIR, p. 15-6.) The SEIR further states that the Project, located on lands not identified for development under the Metropolitan Transportation Plan/Sustainable Communities Strategy (“MTP/SCS”), would conflict with the MTP/SCS strategy for reducing VMT through investments in roadway and multi-modal infrastructure in urban areas. (SEIR, p. 8-22.)

Because the Project generates additional VMT beyond the baseline condition and it is not consistent with the MTP/SCS land use plan, the SEIR concludes that the Project results in a significant and unavoidable impact to VMT. (SEIR, p. 8-22.) The SEIR claims that the “only feasible mitigation measure” is the proposed parking reservation system. (SEIR, p. 8-22.) The SEIR does not impose the parking reservation system as a mitigation measure. In other words, NO mitigation is imposed for an acknowledged significant unavoidable impact.

Moreover, it is well settled that an EIR cannot simply declare an impact significant and unavoidable without considering and imposing feasible mitigation measures. (Public Resources Code § 21081(a)(3); CEQA Guidelines § 15091(a)(3); *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 982; *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, 369.) Notwithstanding the SEIR’s summary rejection, the addition of bike lanes, transit, and pedestrian improvements all appear to be feasible mitigation. The SEIR acknowledges that several future study area bicycle facilities are proposed in the study area and references bus access to the park via Garden Bar Road. (SEIR, pp. 8-8, 8-27.)¹⁷ The Governor’s Office of Planning & Research also lists several VMT Reduction Strategies, including VMT

¹⁶ This is true under both peak periods examined—weekday PM peak and Saturday peak.

¹⁷ The SEIR’s claim that cyclists who would use Project facilities would generally not ride their bicycles to the site relies on the unsupported and speculative assumption that such users would need only bike to access the site and a different bike to use the site. (SEIR, p. 8-28.)

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Reduction in Rural Areas.¹⁸ The SEIR should explain in detail why none of the State's recommended strategies are feasible.

e. Hazards

The SEIR claims that potential hazards to pedestrians will be reduced to less than significant by posting No Parking restrictions along public roads to discourage off-site parking and limit pedestrian movement between off-site parking and each project entry. (Mitigation Measure S8-2 at SEIR, p. 8-30.) But, as the SEIR acknowledges, Auburn Valley Road and Curtola Ranch Road (providing access to Harvego) are private roads. (SEIR, p. 8-5.) Because this measure cannot be feasibly implemented, the impact remains significant and unavoidable.

I73-21

The SEIR further states that increasing the traffic volumes on rural roads from 34 to 664 vehicles on peak days "would not appreciably worsen the existing situation for bicyclists." (SEIR, p. 8-28.) There is no evidence, let alone substantial evidence as required, to support this conclusion.

The SEIR acknowledges that the Project will add a significant volume of traffic to Cramer Road, a roadway that currently experiences collisions at a rate that greatly exceeds the statewide average for similar facilities. (SEIR, pp. 8-28 to 8-29; *see also* SEIR, p. 8-10.) The SEIR states that Measure S8-3 will reduce this significant impact to a less than significant level. But the SEIR does not explain how that measure, which merely requires installation of traffic control devices, will reduce the impact to a less than significant impact. Additionally, the collision rate on several other roadways approach (and in two cases) exceed the statewide average. (*See* SEIR, p. 8-10 [Baxter Grade Road, Bell Road, Fowler Road, Mt. Vernon Road-Wise Road to Joeger Road, Ridge Road, Virginiatown Road, Wise Road-McCourtney Road to Ophir Road].) Yet no analysis of the Project's potential to significantly impact hazards on these roadways is provided.

f. Emergency Access

I73-22

The Project would provide public access to relatively remote areas not accessible from public roads. Some of the trails and bridges are only five to ten feet wide. Although not allowed under the terms of the easement, the County is proposing to provide single-lane access across an earthen dam to the Harvego parking area.¹⁹ There is only one-way in and one-way out of this area. Auburn Valley Road dead ends at the golf course. The SEIR acknowledges that no designated emergency evacuation plans are in place for the existing residential areas surrounding the Project area. Yet remarkably, the SEIR concludes that the Project, located in an area of high fire danger, will not result in inadequate emergency access. This conclusion is not supported by the facts or evidence.

¹⁸ (<http://www.opr.ca.gov/ceqa/updates/sb-743/>)

¹⁹ These facts directly negate the SEIR's claim that the proposed trail network "is designed at a sufficient width to allow emergency vehicles to reach a call for serve at remote locations and for people to exit HFRP and the expansion area in an emergency." (SEIR, p. 8-29.)

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g. Conflict with Policies Adopted to Avoid or Mitigate Environmental Effects

Failure to comply with even one general plan policy is enough to render a project “inconsistent” with the general plan, and any project approvals would be invalid. (*See, e.g., Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 789 [project’s failure to comply with a single general plan provision calling for use of a prescribed traffic study methodology]; *accord, Spring Valley Lake Assn. v. City of Victorville* (2016) 248 Cal.App.4th 91, 101 [invalidating city’s approval of development because of failure to show consistency with one general plan policy] and *California Native Plant Society v. City of Rancho Cordova* (2009) 172 Cal.App.4th 603, 640-642 [finding a project to be inconsistent with an agency’s general plan based on its failure to comply with a single policy requiring the agency to “coordinate” with specified resource agencies on mitigation for impacts to special-status species].)

I73-23

Even assuming for the sake of argument that vehicle delay is not considered a significant environmental impact, a conflict with LOS standards still constitutes an inconsistency with the General Plan. The Project conflicts with the County’s LOS policies and is inconsistent with the General Plan. (*See* Goal 3.A and Policies 3.A.1, 3.A.7, 3.A.9, 3.A.11, 3.A.12, 3.A.13, 3.A.14; *see also* Placer County Impact Analysis Methodology of Assessment at SEIR, p. 8-34.)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Per General Plan Policy 1.G.2, *the County “shall strive to have new recreation areas located and designed to encourage and accommodate non-automobile access.”* Policy 3.C.4 requires proposed projects to meet Trip Reduction Ordinance requirements. Policy 3.D.4 requires the County to promote non-motorized travel through appropriate facilities, programs, and information. Per Policies 3.D.5 and 3.D.7, project proponents are to finance and install pedestrian walkways, equestrian trails, multi-purpose paths, and sheltered transit stops. The County is to provide safe and comfortable routes for walking, cycling, and public transportation. (Policy 3.D.12; *see also* Policies 3.D.8 through 3.D.11.) As explained above, the Project includes none of these features. The Project is not located and designed to encourage and accommodate non-automobile access. To the contrary, it is focused, depends, and is predicated on automobile use.

6. Air Quality

I73-24

The SEIR finds that Project construction emissions would be less than significant. Such emissions are estimated to generate 82 pounds per day of NOx. (SEIR, p. 9-25.) The significance threshold is 82 pounds per day. (*Id.*) As noted above, the SEIR appears to have grossly underestimated construction air quality emissions for Harvego. *The amount of grading required for the Harvego road improvements alone is estimated to be more than fifteen times the amount assumed.* The SEIR itself acknowledges that the “exact project-specific data for each construction phase (*e.g.*, required types and numbers of construction equipment and maximum daily acreage disturbed) were not available at the time of this analysis” and that project-generated emissions were modeled based

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on “general information provided in the project description . . . and default CalEEMOD settings and parameters attributable to the construction period and site location.” (SEIR, p. 9-25.) Had the SEIR done an actual worst-case analysis of concurrent air quality construction emissions, they would far exceeded the significance threshold. This significant impact MUST be disclosed and addressed. This will necessitate revisions and recirculation of the EIR.

The SEIR claims that the Project will not expose sensitive receptors to toxic air contaminants (“TACs”) such as diesel particulate matter because “construction emissions would be temporary and would rapidly dissipate with distance from the source.” (Impact 9-3 at SEIR, p. 9-27.) First, construction emissions are not temporary. The SEIR states that construction activities are expected to last five years for Phase 1 alone. (SEIR, p. 9-24.) Second, sensitive receptors are located in close proximity (as close as 40 feet) to construction activities. (SEIR, p. 10-9.) A health risk assessment should have been prepared to substantiate the SEIR’s conclusion that the Project would result in less than significant impacts related to TACs.

The SEIR states that Project implementation “would not lead to the operation of any stationary source of TACs.” (SEIR, p. 9-29.) But the SEIR acknowledges that the Project will include backup generators. (SEIR, pp. 9-26, 9-29.) Such equipment tends to be diesel-powered.

The air quality analysis is based on the trip generation assumptions. (SEIR, p. 9-22.) As explained in Section II.C.5.b above, the trip generation assumptions appear faulty. In the same manner that the trip figures are suspect and cannot be relied upon, the air quality analysis is likewise infirm.

At minimum, the County was required to consider the health-related effects of all air quality emissions, including criteria air pollutants associated with Project construction activities and operations. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 [EIR overturned for failure to explain how air pollutants generated by a project would impact public health]; *accord, Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184.) Because the County failed to conduct such an analysis, the SEIR fails as an informational document. (*Id.*)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Per Policy 6.F.6, CEQA documents are to include identification of potential air quality impacts and designation of appropriate mitigation measures to reduce impacts. Development is to be located and designed to minimize direct and indirect air pollutants. (Policy 6.F.7.) Proposals are to be submitted to the PCAPCD for review and comment in compliance with CEQA. (Policy 6.F.8.) In reviewing proposals, the County must consider alternatives that reduce emissions of air pollutants. (Policy 6.F.9.) Per Policy 6.G.E, the County is to encourage the use of alternative modes of transportation by requiring new development to provide adequate pedestrian and bikeway facilities.

As noted above, the SEIR does not identify potential air quality impacts nor designate appropriate mitigation measures or alternatives to reduce impacts. PCAPCD is not listed as a

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responsible agency and thus does not appear to have been consulted with by the County or furnished with a copy of the SEIR. Because the SEIR fails to examine the whole of the Project and no health risk study has been performed, one cannot determine whether development will be appropriately located to minimize air pollutants. Further, no alternative transportation facilities are provided to access the Project site.

7. Noise

I73-25

The noise analysis is based on one long-term and two short-term noise measurement locations. (SEIR, p. 10-9.) Explain why these locations were chosen, particularly 6525 Curtola Ranch Road, which is located more than 2,500 feet from the proposed parking area at Harvego. By comparison, 6599 Curtola Ranch Road is located approximately 350 feet from the proposed parking area. (SEIR, p. 10-22.) Explain why long-term and short-term noise measurements were not done for all locations, as is standard.

As to construction noise, the SEIR acknowledges that construction noise levels could exceed 82 dBA L_{eq} at the closest existing noise receptor.²⁰ (SEIR, p. 10-20.) The County's significance threshold asks whether the project would "result in short-term noise levels from construction activities exceeding the applicable County noise standards (Table 10-7 and Table 10-8) . . ." (SEIR, p. 10-18.) Both of the referenced noise standards are based on 24-hour day-night noise levels or L_{dn} . The SEIR then ignores these standards and relies on an exception to a different standard (based on hourly noise averages or L_{eq}) in concluding that impacts will be less than significant. (SEIR, pp. 10-18 to 10-21.)

The long-term measurement at 6525 Curtola Ranch Road shows that currently noise levels (50.2 dBA L_{dn}) exceed the County noise standard of 50 dBA L_{dn} . (SEIR, p. While no L_{dn} measurement was done to include Project construction, it is reasonable to assume that such activities would exceed current levels. As such, the Project would result in short-term noise levels exceeding the applicable County noise standard. This impact is not acknowledged or addressed in the SEIR.

Even assuming the noise ordinance's exemption for construction activities applied, the SEIR still failed to disclose and address significant noise impacts. The SEIR concluded that the impact would be less than significant because construction noise is exempt from that standard. (SEIR, p. 10-21.) The Third Appellate District has repeatedly invalidated EIRs that rotely relied on standards that did not actually reflect environmental impacts. (*See, e.g., East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281 [struck down an EIR which concluded that traffic impacts were not significant based on plan policies allowing LOS E or F conditions in certain downtown locations] and *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099 [EIR's reliance on a threshold that failed to account for project impacts

²⁰ This noise amount is without feasible noise controls. Table 10-10 shows lower noise volumes with feasible noise control. (SEIR, p. 10-19.) But there is no mitigation requiring that such feasible noise controls be implemented.

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was overturned].) An EIR must explain why an impact is not significant. (Public Resources Code § 21100(c); CEQA Guidelines § 15128.) And “the fact that a particular environmental effect meets a particular threshold cannot be used as an automatic determinant that the effect is or is not significant.” (*Protect the Historic Amador Waterways, supra*, 116 Cal.App.4th at 1109.)

Under its discussion of operational noise impacts, the SEIR states that noise “would not exceed the daytime or nighttime noise standards—55 dBA and 45 dBA, respectively—established by the Placer County Noise Ordinance (Table 10-9), nor would it substantially increase ambient noise at nearby existing noise-sensitive receptors.” (SEIR, p. 10-22.) The SEIR does not consider noise generated by features associated with the Project, such as helicopters and emergency generators.²¹ More fundamentally, the SEIR again ignores the noise standard for “Other Residential” in Table 10-7 even though that standard is referenced in the significance threshold. (SEIR, p. 10-18.) No analysis is provided to show that operational noise levels would not exceed these standards, including an increase in ambient noise levels by more than 3dBA at nearby existing noise-sensitive receptors. Thus, there is no evidence to support the less than significant impact conclusion.

The noise analysis is based on the trip generation assumptions. (SEIR, p. 10-22.) As explained in Section II.C.5.b above, the trip generation assumptions appear faulty. In the same manner that the trip figures are suspect and cannot be relied upon, the noise analysis is likewise infirm.

The SEIR does not contain a table or chart showing traffic noise levels under existing conditions and existing plus project conditions. The SEIR finds that existing traffic noise levels would increase at existing noise-sensitive receptors by more than 3 dBA on proposed park entry access roads. (SEIR, p. 10-24.) It is unclear which sensitive receptors or proposed park entry roads are being referenced here. The SEIR concludes that this impact would be less than significant with implementation of Mitigation Measures 10-1 and S10-2.²² But again there is no table or chart showing/proving this to be the case.

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Goal 9.A requires the County to protect County residents from the harmful and annoying effects of exposure to excessive noise. Policy 9.A.2 requires noise generated by new non-transportation sources to be mitigated so as not to

²¹ In addition to assisting with emergency response, the SEIR notes that helicopters may be used to install the major bridges over Raccoon Creek. (SEIR, p. 3-43.)

²² Those measure restrict park operating hours and require the use of pavement for access roads. Mitigation Measure 10-1 refers to Table 10-1 from the 2010 EIR. That table examined noise impacts associated with current park operations, not the proposed park expansion. Moreover it only assumed 25 percent of park traffic would access the park through Mears Road even though 100 percent of park traffic currently accesses the park through that lone entry point. (*See* Table 10-11, note 1, at SEIR, p. 10-24.)

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↑ exceed the noise level standards of Table 9-1 (SEIR, Table 10-7) as measured immediately within the property line of lands designated for noise-sensitive uses. Policy 9.A.9 requires noise generated by new transportation sources to be mitigated so as not to exceed the levels specified in Table 9-3 (SEIR, Table 10-8) at outdoor activity areas or interior spaces of existing noise sensitive land uses. Policy 9.A.11 requires the implementation of specified mitigation measures for significant noise impacts, e.g., rerouting traffic, lowering speed limits, payment of fees for noise mitigation, acoustical treatment of buildings, and construction of noise barriers.

As noted above, the Project will result in significant, unmitigated construction noise impacts. There is no evidence to show that significant operational noise impacts due to Project traffic will not exceed the standards set forth in Table 10-8. Further, the proposed mitigation measures do not incorporate the mandatory measures set forth in Policy 9.A.11.

8. Hydrology and Water Quality

The environmental setting section does not describe or depict the NID canal located adjacent to Curtola Ranch Road. It could be substantially impacted by Project construction activities, but the potential discharges to it are ignored by the SEIR. The SEIR also does not list the water body of which Bear River is a tributary so as to substantiate the beneficial uses listed on page 11-7. Additionally, the amount of disturbed lands and impervious surfaces is not consistently represented. (See, SEIR, pp. 11-13, 11-17, 12-40, 17-13.) Similar to the vast underestimation of grading and related impacts, the ground disturbance figures on page 11-13 appear to be similarly flawed.

I73-26

Impact 11-1 states that construction-related impacts to Raccoon Creek could be significant, but the analysis observes that the Project could impact *both* Raccoon Creek and Bear River. (SEIR, p. 11-12 to 11-14.) This impact is identified as significant. The SEIR states that the impact will be reduced to less than significant through grading and drainage plans (Mitigation Measure 11-1) and regional water quality control board approval (Mitigation Measure S5-1). But there is no explanation of how these measures will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)

Impact 11-2 states that operational-related impacts to Raccoon Creek could be significant, but the analysis observes that the Project could impact *both* Raccoon Creek and Bear River. (SEIR, p. 11-14 to 11-15.) This impact is identified as significant. The SEIR states that the impact will be reduced to less than significant through grading and drainage plans (Mitigation Measure 11-1) and regional water quality control board approval (Mitigation Measure S5-1). But again there is no explanation of how these measures will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)

Impact 11-3 analyzes the Project's potential to adversely impact water quality through the installation of three new septic systems. This impact is identified as significant. The SEIR states that the impact will be reduced to less than significant through the well permitting process (Mitigation Measure 11-2). The SEIR fails to explain how this measure will minimize significant

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environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).) The Project’s potential to result in contamination to the NID canal, Raccoon Creek, and/or the Bear River is not acknowledged or addressed by the SEIR. The SEIR appears to incorrectly state that the septic system “would be designed to have a 5-foot separation to groundwater or impermeable layer from leach lines. . .” (SEIR, p. 11-16.) Mitigation Measure 11-2 details greater distances between the septic system and groundwater resources.

The SEIR finds that a significant impact to groundwater quality could occur if a groundwater well is used to supply the emergency storage tanks. The SEIR states that the impact will be reduced to less than significant through the well permitting process and backflow prevention devices (Mitigation Measures 11-2 and 11-3). Neither of those measures require a backflow prevention device. Mitigation Measure 11-3 provides for relying on NID water without requiring the necessary approvals or permits. Moreover, the SEIR fails to explain how these measures will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)

Portions of the Project area are within the 100-year floodplain of Raccoon Creek. (SEIR, p. 11-6.) The SEIR notes that one of the new bridges across Raccoon Creek (Bridge 5) will be within the 100-year floodplain. The SEIR states that impacts will be less than significant because the bridge will be constructed to withstand flood events and access to Raccoon Creek will be restricted in the event of a flood. Yet no mitigation measures are imposed to require the features relied on to reach this conclusion. (CEQA Guidelines § 15126.4(a)(2).)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Goal 6.A calls for the protection of the County’s rivers, streams, creeks, and groundwater. Groundwater resources are to be protected from contamination and overdraft, including by controlling sources of potential contamination and allowing use of groundwater in the western part of the County “only where it can be demonstrated that this use does not exceed safe yield and is appropriately balanced with surface water supply to the same area.” (Policy 6.A.13.) Goal 8.B calls for minimizing the risk of loss of life, injury, damage to property, and economic and social dislocations resulting from flood hazards. Policy 8.B.1 requires the County to promote flood control measures that maintain natural conditions within the 100-year floodplain of rivers and streams.

As noted above, the Project includes large septic systems that could impact groundwater resources. The Project also proposes to rely on wells for water supply and fire suppression even though a well had to be shut down at the existing park due to low yield. These factors could lead or contribute to contamination and overdraft.

9. Biological Resources

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Based on the California Natural Diversity Database, 35 special-status wildlife species have the potential to occur in the Project vicinity. (SEIR, p. 12-26.) The SEIR eliminates discussion of

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↑ 14 of these 35 species stating that they have no potential to occur in the Project area.²³ (SEIR, p. 12-26.) Explain further why this is the case. Also explain why only 13 species are listed on page 12-26. On page 12-27, the California red-legged frog, a federally threatened species, is identified as not likely to occur. Yet on page 12-31, the SEIR states that this species potentially occurs in the Project area.

The SEIR states that the Project area “supports suitable habitat for a wide variety of resident and migratory wildlife species.” (SEIR, p. 12-18.) It also notes that the Project would result in a significant impact on biological resources if it would interfere substantially with the movement of any such species or wildlife corridors. (SEIR, p. 12-40.) The Project parking areas and improvements will be located in places that currently serve as wildlife corridors. Further, fencing would be installed to separate the public park lands from privately-grazed lands. (SEIR, p. 4-15.) Yet no analysis of the Project’s impacts on wildlife corridors is provided in the SEIR. (SEIR, p. 12-41.)

Similarly, although the Project includes two major bridges, 15 trail bridges, 30 stream ford crossings, and 20 culvert crossings, the SEIR does not analyze and address the Project’s impact to these riparian areas, as required. (See SEIR, p. 12-41; see also General Plan, Goal 6.A and Policies 6.A.1, 6.A.3, 6.A.4, 6.A.5.) Instead, the SEIR focuses exclusively on wetlands, which is a separate and distinct inquiry. (SEIR, p. 12-41; 12-51 to 12-52.) In addition to the Bear River, the Harvego properties contain 16 miles of streams and a half-dozen ponds/wetlands. (Phase 1 Report, p. 2.)

The SEIR notes that Project construction activities could result in temporary and long-term degradation of aquatic habitats, loss of important shaded riverine aquatic habitat functions, and increased injury or mortality to fish species because of increased angling pressure. (SEIR, p. 12-43.) This impact is identified as significant. The SEIR states that the impact will be reduced to less than significant through Mitigation Measures S12-1, S12-2, S5-1, and 11-1 “or the incorporation of avoidance and minimization measures from the [Placer County Conservation Program (“PCCP”)] (if adopted) . . .” But there is no explanation of how these measures will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).) And the County cannot legally rely on a program that has not yet been adopted, and that may (or may not) address the affected fish species and their habitats, to mitigate significant impacts. (CEQA Guidelines § 15126.4(a)(2).)

Impact 12-2 acknowledges that “[r]oadway and parking improvements in the Curtola Ranch Road/Harvego Preserve area and access/parking areas on Twilight Ride Property and other areas near potential California red-legged frog habitat could directly or indirectly affect this species.” (SEIR, p. 12-45.) This impact is identified as significant. The SEIR states that this impact will be reduced to less than significant through Mitigation Measure S12-3, which requires “coordination with the USFWS to determine if California red-legged frogs could be affected by proposed

²³ Only 10 of these 14 are listed in the associated biological resources report. (SEIR, Appendix I.) Please explain the discrepancy.

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↑ construction,” and implementation of “appropriate measures to avoid, minimize, or mitigate for these impacts.” (SEIR, p. 12-45.) Alternatively, if the PCCP were to be adopted prior to Project construction, the County could rely on the measures set forth therein along with payment of the required fee. There is no explanation of how this measure will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)²⁴ For instance, the measure does not require that surveys be done for this species. And the County cannot legally rely on a program that has not yet been adopted, and that may (or may not) address the affected frog species, to mitigate significant impacts. (CEQA Guidelines § 15126.4(a)(2).)

Impact 12-3 recognizes that the Project may potentially impact the foothill yellow legged-frog, a state candidate for listing, and the western pond turtle, a state species of special concern. This impact is identified as significant. The SEIR states that this impact will be reduced to less than significant through Mitigation Measure S12-4, which requires “coordination with CDFW to assess the potential for these species to occur in or near work areas, and other measures to avoid, minimize, and mitigate for potential impacts on these species.” (SEIR, p. 12-46.) Alternatively, if the PCCP were to be adopted prior to Project construction, the County could rely on the measures set forth therein along with payment of the required fee. There is no explanation of how this measure will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).) For instance, the measure does not require that surveys be done for these species. And the County cannot legally rely on a program that has not yet been adopted, and that may (or may not) address the affected species, to mitigate significant impacts. (CEQA Guidelines § 15126.4(a)(2).)

↓ “Vegetation removal and ground disturbance could result in direct or indirect impacts on nests of raptors and non-raptor birds, including special-status species, and could cause nest abandonment or failure.” (Impact 12-4 at SEIR, p. 12-47.) This impact is identified as significant. The SEIR states that this impact will be reduced to less than significant through Mitigation Measure S12-5, which requires “pre-construction nesting bird surveys for vegetation removal or ground disturbance occurring during the nesting season, and establishment of non-disturbance buffers during construction to avoid disturbance.” (SEIR, p. 12-47.) Alternatively, if the PCCP were to be adopted prior to Project construction, the County could rely on the measures set forth therein along with payment of the required fee. Mitigation Measure S12-5 does not address White-tailed kite, a fully protected species, or Grasshopper sparrow, a state species of special concern, both of which have the potential to occur in the Project area. (SEIR, p. 12-28.) The County cannot legally rely on a program that has not yet been adopted, and that may (or may not) address the affected bird species, to mitigate significant impacts. (CEQA Guidelines § 15126.4(a)(2).)

²⁴ (See also *California Clean Comm. v. City of Woodland* (2014) 225 Cal.App.4th 173, 197 [fee to offset urban decay impacts not valid mitigation because it was not linked to any specific mitigation program]; accord, *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1122 [traffic impact fee was not adequate mitigation because no binding commitment to make improvements was in place].)

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Per Impact 12-6, Project construction could significantly impact roosts of certain specified bat species. Although these roosts could occupy mine tunnels, caves, abandoned buildings, and rock outcroppings, the proposed mitigation measure—Mitigation Measure 12-5—focuses exclusively on trees. (SEIR, pp. 12-59 to 12-60.) It also purports to address ringtail, a fully protected species, even though impacts to that species are not described under Impact 12-6.

The SEIR inconsistently reports the acreage of potential jurisdictional wetlands in the Project study area—5.6 acres and 5.01 acres. (SEIR, p. 12-51.) Neither of these figures comport with the figure reported in the Delineation of Wetlands and Other Waters of the United States (Appendix I). The listed amounts in the next to last paragraph on page 12-51 do not total either 5.6 or 5.01 acres.

There are also no surveys or other data to justify the figures in Table 12-5 and the associated statement that the Project “would result in temporary impacts of up to 0.317 acre of potentially jurisdictional waters of the United States.” (SEIR, p. 12-52.) The description of the impact as “temporary” is also incorrect as the next sentence states that most of the affected acreage will be permanently impacted. (*Id.*) Moreover, in light of the roadway improvements needed to access the Harvego parking lot and staging area, the affected wetlands acreage appears to be grossly understated.

The SEIR identifies the Project’s impacts to wetlands as significant. However, it states that implementation of Mitigation Measure S12-2, requiring authorizations from the U.S. Army Corps of Engineers (“USACE”) and the Regional Water Quality Control Board (“RWQCB”) for wetlands fill, or payment of fees and incorporation of avoidance and minimization measures consistent with the PCCP assuming such program is adopted prior to Project construction. Alternatively, the County may choose to use the Western Placer County Voluntary Interim In Lieu Fee Program to satisfy USACE and RWQCB mitigation requirements for the Project’s impacts to aquatic resources. There is no explanation of how this measure will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).) And the County cannot legally rely on a program that has not yet been adopted, and that may (or may not) address wetlands, to mitigate significant impacts. (CEQA Guidelines § 15126.4(a)(2).)

The Project would require the removal of an unspecified number of trees that are greater than 5 inches dbh, resulting in a significant environmental impact. (SEIR, p. 12-53.) The SEIR finds that the impact would be reduced to less than significant through implementation of Mitigation Measure S12-7, which requires payment of a fee into the County’s oak woodland preservation fund, or reliance on the measures set forth in the PCCP and payment of the required fee if the PCCP were to be adopted prior to Project construction. (SEIR, p. 12-53.) There is no explanation of how this measure will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).) And the County cannot legally rely on a program that has not yet been adopted, and that may (or may not) address trees, to mitigate significant impacts. (CEQA Guidelines § 15126.4(a)(2).)

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Finally, the SEIR fails to acknowledge and address the Project's conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Goal 6.B calls for the protection of wetland communities and related riparian assets. Policy 6.B.1 requires adherence to a "no net loss" policy for wetland areas and coordination with federal and state agencies to ensure impacts are adequately addressed.

Goal 6.C requires the protection, restoration, and enhancement of habitats that support fish and wildlife species so as to maintain populations at viable levels. Policies 6.C.1 and 6.C.6 require protection of significant ecological resource areas and other unique wildlife habitats, including wetlands, any habitat for special status or protected species, large areas of non-fragmented natural habitat, and identifiable wildlife movement zones. Policy 6.C.7 requires the County to support the maintenance of suitable habitats for all indigenous species of wildlife through maintenance of habitat diversity.

Oak woodlands, landmark trees, and other outstanding areas of natural vegetation are to be preserved and protected. (Goal 6.D; Policies 6.D.3, 6.D.4.) Wetlands and riparian communities are to be restored or expanded, where possible. (Policy 6.D.7.) Policy 6.D.9 requires that development on hillsides be limited to maintain valuable natural vegetation, especially forests and open grasslands, and to control erosion.

Goal 6.E requires the preservation and enhancement of open space lands to maintain the natural resources of the County. Policy 6.E.1 requires the County to "permanently protect, as open space, areas of natural resource value, including wetlands, riparian corridors, unfragmented woodlands, and floodplains." Open space and natural areas are to be maintained to protect wildlife movement and biodiversity. (Policies 6.D.6, 6.E.3.) Further, the County shall ensure that recreational activity is distributed and managed according to an area's carrying capacity, with special emphasis on controlling adverse environmental impacts, conflict between uses, and trespass. (Policy 5.A.13.)

As noted above, the Project will impact wetlands and habitat for wildlife species, including protected species. The mitigation imposed will not reduce these impacts to a less than significant level. Mitigation Measure S12-2 allows the County to avoid coordination with federal and state agencies as required by Policy 6.B.1. The Project will result in the removal of an unspecified number of large trees (including oaks) and other vegetation. The Project will transform the area from natural open space to urban recreational uses, including a 130-space parking lot on a bucolic, rural hillside.

10. Public Services and Utilities

I73-28

In its discussion of environmental setting, the SEIR states that water sources in the Project area includes groundwater for potable purposes and canal water for non-potable purposes (e.g., emergency water storage, landscape irrigation, etc.) (SEIR, p. 13-2.) The SEIR goes on to state that canal water "currently exists at the proposed parking areas." As noted above, the County does not appear to have permission from NID to use canal water for the specified purposes.

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The discussion of Impact 13-1 (Potential for project operation to require construction or relocation of new facilities for provision of water or wastewater) focuses mostly on the exiting HFRP and the abandoned well which does not produce sufficient yields. While the proposed utilities are generally described, no specific analysis of the impacts of constructing these facilities is provided. The SEIR concludes, without any supporting analysis or evidence, that “[b]ecause adequate water and wastewater facilities would be included for proposed uses, this impact would be less than significant.” (SEIR, p. 13-12.)

The SEIR finds that impacts associated with the increased demand for fire and emergency medical services are less than significant with Mitigation Measure S13-1, which requires the purchase of one light rescue vehicle. (Impact 13-3 and Impact 13-4.) Most of the analysis focuses on the separate and distinct issue of increased wildfire risk. That topic is addressed separately in Chapter 16 of the SEIR. Further, there is no real discussion of increased response times, which is supposed to be the focus of Impact 13-4. In order to reduce response times, the County Fire Department and CAL FIRE are seeking resources to staff the currently closed fire station at Lone Star Road and Highway 49. (SEIR, p. 16-2.) The Project would appear to significantly hinder, rather than help, that effort.

The SEIR references the construction of “emergency access roads and bridges.” (SEIR, pp. 13-15, 13-16, 13-18.) This appears to refer to the trails and creek crossings, which are not identified as suitable to provide emergency access. The Project Description notes that the Project will provide drivable 12 foot fire access roads on the trails “as far as reasonably possible.” (SEIR, pp. 3-24, 3-35, 3-41.) There is no indication for how far this is nor that the trails and bridges would be designed to accommodate a 75,000 pound fire truck. (SEIR, pp. 3-24, 3-35, 3-41.)

The SEIR further states that emergency access to the expansion areas will be provided by Curtola Ranch Road, Bell Road, and Garden Bar Road. (SEIR, pp. 13-16, 13-18.) As to Curtola Ranch Road, that road is not proposed to be widened to 20 feet so as to provide emergency access until Phase 3. (SEIR, p. 3-35.) Even then, the portion of the road over the dam would not be widened so that only one-way traffic would be accommodated. (*Id.*) Please explain in detail whether and how such a roadway feature was deemed acceptable from an operational and safety standpoint by appropriate fire/emergency response personnel and public works/ engineering staff. Provide any supporting documentation, including the names of staff members spoken to, sources relied on, and agencies consulted.²⁵ Garden Bar Road is also not proposed to be widened to 20 feet from Mt. Pleasant Road to the entrance access road until Phase 3. (SEIR, p. 3-25.)

The SEIR states that each parking area is planned with an emergency helicopter landing zone. (SEIR, p. 13-18.) According to the project description, helipads are only proposed at Harvego and

²⁵ Along those lines, why did the County not consult with CAL FIRE as to the SEIR? (*See* Notice of Completion & Environmental Document Transmittal, received by the State Clearinghouse on February 20, 2020.)

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↑ Twilight, not Garden Bar. (SEIR, p. 3-13.) Impact 13-6 refers to the potential for “large events” in the expansion area. (SEIR, pp. 13-20 to 13-21.) Such events are not analyzed in the SEIR. The Project Description specifically states that the expansion areas are not suitable for large events. (SEIR, p. 3-48.)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Per Goal 4.D and Policy 4.D.11, wastewater treatment facilities must be designed in a manner so as to avoid adverse water quality or health impacts. Goal 4.I and Policy 4.I.2 calls for fire response times of 10 minutes in rural areas. As noted above, the SEIR does not adequately analyze or address these issues.

11. Hazardous Materials and Hazards

The SEIR does not analyze whether the Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan “because emergency ingress and egress routes would remain open during both construction and operation.” (SEIR, p. 14-10.) The SEIR also states that “proposed roads would provide enhanced emergency access to all portions of the project area over what is currently available, including those across Raccoon Creek.” (*Id.*) As noted above, these statements are not accurate.

I73-29

Per the discussion of Impact 14-2, “[a]n accidental spill or other release of even a small amount of a hazardous material in this area during project construction or maintenance could have a substantial effect on the quality of the natural environment.” (SEIR, p. 14-12.) However, the SEIR states that implementation of Mitigation Measure 14-1 and S5-1 would reduce this impact to a less than significant level. (*Id.*) There is no explanation of how this measure will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)

The SEIR states that any degradation hunting would take place only during times of park closures in order to eliminate safety hazards to the public. (SEIR, pp. 14-13 to 14-14.) However, there is no mitigation requiring such mitigation. As such, this impact remains significant.

The SEIR acknowledges that during ground preparation and construction activities, construction workers could come into contact with and be exposed to currently unknown hazardous materials. (SEIR, p. 14-15.) The SEIR states that Mitigation Measure 14-2, requiring a safety hazard plan and soil sampling, would reduce this impact to a less than significant level. (*Id.*) Mitigation Measure 14-2 states that soil sampling “shall be conducted during the entitlement process (i.e., conditional use permit).” (SEIR, p. 14-17.) We are not aware that the County has conducted any soil sampling as required by this measure. Moreover, there is no explanation of how this measure will minimize significant environmental impacts, as required. (CEQA Guidelines § 15126.4(a)(1).)

↓ The SEIR states that the Project could include new stock ponds developed for grazing or fuel management purposes. (SEIR, p. 14-15.) Yet stock ponds are not described or analyzed as a Project feature in the SEIR. There are existing stock ponds in the area and the SEIR correctly observes that

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↑ the Project increases the number of people in an area that could contain several potential mosquito-breeding sites. (SEIR, p. 14-15.) The SEIR notes that impacts from current and proposed stock ponds will not be significant due to coordination with the Vector Control District, but there is no mitigation requiring such coordination. (SEIR, p. 14-16.) As such, this impact remains significant.

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Goal 8.E requires the maintenance of an Emergency Management Program to effectively prepare for, respond to, recover from, and mitigate the effects of natural or technological disasters. Policy 8.G.13 requires the County to work with local fire protection and other agencies to ensure an adequate Countywide response capability to hazardous materials emergencies. As noted above, the SEIR does not adequately analyze or address these issues.

12. Greenhouse Gas Emissions and Energy

I73-30

Citing the 2035 MTP/SCS, this section states the Project site is designated “Developing Community.” (SEIR, p. 15-12.) The Transportation and Circulation section cites the 2020 MTP/SCS and notes the Project site is designed as “Lands not Identified for Development.”²⁶ (SEIR, pp. 8-22, 18-7.) These citations should be rectified and the analysis revised as appropriate.

The GHG analysis in an EIR must reflect evolving scientific knowledge and state regulatory schemes.²⁷ But, the SEIR contains NO analysis of the Project’s GHG emissions compared to 2050 GHG reduction standards. Instead, it appears to focus exclusively on 2020 or 2030 standards. This does not reflect a good faith effort to analyze and disclose impacts, as required by CEQA. (CEQA Guidelines § 15151 [“An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences” and that in reviewing an agency’s efforts in regard to preparing an EIR courts look for “adequacy, completeness, and a good faith effort at full disclosure”]; accord, CEQA Guidelines § 15204(a) [requiring that a “good faith effort at full disclosure [be] made in the EIR.”].)

The SEIR misstates the air district’s GHG threshold as applying to both construction and operational phases of development projects. As noted on page 24 of PCAPCD’s CEQA Air Quality Handbook, the District’s bright line GHG threshold of 10,000 metric tons of carbon dioxide equivalent (“MT CO₂e”) “is applied to land use projects’ construction phase and *stationary source projects*’ construction and operational phases.” The Project is not a stationary source. Thus, the bright line threshold does not apply to Project operations.

²⁶ Such areas “are typically located outside urbanized areas and designated in local land use plans for no further development.” (SEIR, p. 18-7.)

²⁷ (*Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 223; *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497, 519.)

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If a project's operational emissions exceed 1,100 MT CO₂e/yr, then the reviewing agency must analyze emissions compared to an efficiency metric. The SEIR states that emissions associated with Project operations are 6,419 MT CO₂e/yr. (SEIR, p. 15-15.) Instead of evaluating the significance of operational emissions based on the efficiency metric, as required by PCAPCD's thresholds, the SEIR concludes that operational emissions are less than significant based on the inapplicable bright-line standard. (SEIR, pp. 15-15 to 15-16.)

The Project also does not analyze whether the Project would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. The SEIR only cites the 2008 Scoping Plan. That plan has been revised and updated multiple times since 2008. The latest version, which includes the strategy for achieving California's 2030 GHG target, is dated November 2017.

While including energy impacts in its significance thresholds, the SEIR contains zero analysis of the Project's conformance with these standards. On this basis alone, the SEIR must be revised and recirculated for public review. (*Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 266-267 [EIR ordered recirculated for failure to contain mandatory analysis of energy impacts].)

13. Wildfire

I73-31

The SEIR does not analyze whether the Project would substantially impair an adopted emergency response plan or emergency evacuation plan even though *the Project area is in or near* state responsibility areas AND *lands classified as high or very high fire hazard severity zones*, either of which trigger such analysis. (SEIR, p. 16-6.) The SEIR states that emergency access maps would be completed prior to the opening of each phase to the public for the areas affected by that phase. (SEIR, p. 16-10.) But there is no binding or enforceable mitigation requiring the County to prepare such maps. (CEQA Guidelines § 15126.4(a)(2).)

Similarly, the SEIR does not analyze whether the Project would expose people or structures to significant risk including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes. Citing mitigation measures imposed to address geology and hydrology impacts, the SEIR notes the County would implement best management practices and comply with regulatory requirements. (SEIR, p. 16-13.) This issue should have been analyzed and addressed in this section.

The SEIR further relies on statements that trail design would follow natural drainage patterns as well as topography, soils, waterways and natural vegetation and that construction on steep slopes would be avoided during final design of the alignment (except at places such as the bridge overcrossings of Raccoon Creek). But there is no binding or enforceable mitigation requiring the County to adhere to these design and construction methods. (CEQA Guidelines § 15126.4(a)(2).)

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The discussion of Impact 16-1 does not sufficiently describe or address the potential wildfire risk. The Project is located in an area of moderate to high fire risk, with portions of the site located immediately adjacent to areas of very high fire danger risk. (SEIR, pp. 16-5 to 16-6.) Within ten miles of the Project area, there have been 14 fires that burned over 20 acres. (SEIR, p. 16-2.) As noted above, the SEIR’s statement that trails and bridges would be a minimum of 8-12 feet wide and designed to accommodate emergency vehicles is not accurate. (SEIR, p. 16-16.) Further, contrary to CEQA, the SEIR purports to rely on several measures that are identified as Project components instead of properly identified as mitigation measures. (SEIR, pp. 16-16 to 16-17; *Lotus v. Department of Transportation* (2014) 233 Cal.App.4th 645, 656 [court overturns EIR for “compressing the analysis of impacts and mitigation measures into a single issue, [thereby] disregard[ing] the requirements of CEQA.”].)

The SEIR fails to acknowledge and address the Project’s conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. Goal 8.C requires the County to minimize the risk of loss of life, injury, and damage to property and watershed resources from unwanted fires. Policies 8.C.1 and 8.C.3 require that development in high fire hazard areas be designed and constructed in a manner that minimizes the risk from fire hazards and meet all applicable state, County, and local fire district standards. Policy 8.C.2 requires that new development in fire hazard areas be conditioned to include requirements for fire-resistant vegetation, cleared fire breaks, or a long-term comprehensive fuel management program. As noted above, the SEIR does not adequately analyze or address these issues.

D. The SEIR improperly defers mitigation to a later time.

Formulation of mitigation measures should not be deferred until a later time. (CEQA Guidelines § 15126.4(a)(1)(B); *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296.) Deferral is permitted only in limited circumstance where a lead agency can show: (1) practical considerations prohibit devising such measures earlier in the planning process and (2) the EIR specifies the specific performance standards capable of mitigating the project’s impact(s) to a less than significant level. (*Sacramento Old City Ass’n. v. City Council* (1991) 229 Cal.App.3d 1011, 1028-1029; *Clover Valley Foundation v. City of Rocklin* (2011) 197 Cal.App.4th 200, 237.)

I73-32

Mitigation Measure 9-1 calls for the future preparation of an Asbestos Dust Mitigation Plan. Other than the requirement that the plan be developed there is no performance standard specified, as required. Moreover, no explanation or rationale is provided as to why this plan was not prepared and included as part of the SEIR.

As to hydrology impacts, Mitigation Measure 11-1 requires the County to prepare and implement a Grading and Drainage Plan. Other than the requirement that the plan be developed there is no performance standard specified, as required. Moreover, no explanation or rationale is provided as to why this plan was not prepared and included as part of the SEIR.

To address the Project’s potential impacts to hazard and hazardous materials, Mitigation Measure 14-2 calls for the preparation and implementation of a Safety Hazard Plan. Again, no

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I73-32 ↑ performance standards are specified for the plan, as required. Moreover, no explanation or
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E. The SEIR fails to analyze a reasonable range of alternatives to the Project.

Contrary to CEQA, the SEIR does not analyze a reasonable range of alternatives that would meet most of the basic project objectives while avoiding or significantly reducing the project's significant impacts. (CEQA Guidelines § 15126.6.)

The SEIR considers three alternatives to the Project. These include the mandatory No Project Alternative (Alternative 1), Reduced Visitor Access for the Three New Parking Areas (Alternative 2), and Reduced Visitor Access for Garden Bar Road Access Only (Alternative 3).

I73-33 ↓ The SEIR incorrectly claims that the No Project Alternative would not meet any of the project objectives. (SEIR, p. 17-4.) The No Project Alternative would still allow the existing HFRP, consisting of nearly 1,200 acres, to function. This comports with Objective 2 to have a regional park of 300 acres or more for South Placer residents with a variety of passive recreational opportunities.²⁸ It also comports with Objectives 3 and 4 by not overburdening natural resources, local roadways or adjacent communities and maintaining safety for park users, visitors, and nearby residents. In addition to any privately-owned space, the approved 70 spaces at Garden Bar could still be provided.²⁹ (Objective 5.) Further, the No Project Alternative does not preclude development of a system of interconnected trails within the existing HFRP or elsewhere in the County nor does it prohibit expansion of opportunities for natural, cultural, agricultural, or historic education, stewardship, and environmental awareness. (Objectives 1, 6, 7.)

The SEIR identifies Alternative 2 as the environmentally superior alternative. Alternative 2 would reduce the amount of parking by 60 percent, reducing the number of automobile parking spaces from 297 to 127 and horse trailer spaces from 68 to 20. (SEIR, p. 17-7.) Most of the spaces eliminated are at Harvego, restrooms and related facilities would also be removed from Harvego. The SEIR states that pull-outs, rather than widening, would be provided along Curtola Ranch Road, acknowledging that this would require an amendment to the current easement terms. (SEIR, p. 17-5.) According to the SEIR, this alternative “would generate fewer trips on local roads, fewer air emissions during construction and operation, and would decrease activity at the three new proposed trailheads.” (SEIR, p. 2-3.) It would avoid entirely the significant unavoidable visual impact to Garden Bar Road. (SEIR, pp. 2-3, 2-4, 17-4.) Although Alternative 2 would not eliminate the significant and unavoidable VMT impact, “it would substantially reduce the vehicle

²⁸ On peak days, the existing park currently attracts most visitors from outside the County. (SEIR, p. 8-18.)

²⁹ The original Notice of Preparation included a proposal for up to 60 privately-owned parking spaces, but it was removed from the Project Description without any explanation. (SEIR, p. 3-15.)

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Cont'd

↑ trips on local roads.” (SEIR, p. 17-14.) It would also meet most of the basic project objectives.³⁰ (SEIR, pp. 2-4, 17-15.)

Further, as noted above, the Project is not consistent with the General Plan or Zoning Ordinance as stated on pages 17-6 and 17-10. The operational GHG threshold is not 10,000 MT CO₂e per year as stated on pages 17-9 and 17-14. The GHG analysis of Alternative 3 improperly amortizes construction emissions over a 30-year period contrary to the significance threshold, and the analysis of the Project and other alternatives. (SEIR, p. 17-14.)

F. The SEIR fails to consider and discuss cumulative impacts.

The SEIR states that it uses the list method instead of the summary of projections method for analyzing cumulative impacts. (SEIR, p. 18-3.) But most of the discussion does not reference the impacts from projects on the list. The list itself (at page 18-4) is quite short and appears to be under-inclusive. Moreover, there is no detailed analysis of the projects on the list. For instance, the additional events that would be allowed per the amended Winery & Farm Brewery Ordinance are not analyzed in any detail. This is a particularly significant omission if the additional events will include weddings, concerts, or related functions.

I73-34

As to cumulative land use impacts, the Project is not consistent with the County’s General Plan and Zoning Ordinance, as noted above. (SEIR, p. 18-5.) Moreover, the fact that the Project may not result in a significant impact on a project level does not mean that it will not have a significant impact on a cumulative level, as the SEIR concludes. (SEIR, p. 18-5 [“Because no significant impact on land use or agricultural resources was identified, the HFRP Trails Expansion would not create a considerable contribution toward a cumulative impact.”].)

As noted above, the mitigation for various resource categories—Visual Resources, Cultural Resources, Hydrology and Water Quality, Biological Resources, Hazardous Materials and Hazards—has not proven to be effective or enforceable. Thus, it cannot be relied on to determine that cumulative impacts to these resources will be less than significant.

On page 18-6, the SEIR acknowledges that the Project will result in a significant unavoidable cumulative impact to visual resources. This is not acknowledged in the Summary Section (Chapter 2) or in the discussion of Alternatives (Chapter 17.) Unlike VMT, this is not identified by impact number nor does the SEIR describe feasible mitigation for this significant impact.

The cumulative analysis of VMT does not appear to be based on the list-method or summary of projections method. As noted above, the SEIR fails to consider feasible mitigation for this significant impact.

³⁰ Project objectives do not include providing helipads and water tanks. Thus, the fact that Alternative 2 does not contain these features does not mean that it does not meet project objectives as stated on page 17-9 of the SEIR.

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Cont'd

The figures stated on page 18-8 for the Project's construction-related air quality emissions do not match those reported in Chapter 9 (Air Quality). (See Table 9-4 at SEIR, p. 9-25.) Simply because air quality emissions are less than significant on a project-level does not mean that those emissions will likewise be less than significant on a cumulative level. (SEIR, pp. 9-23, 18-8.)

The discussion of cumulative noise impacts acknowledges that Project construction activities will result in exterior noise levels of more than 82 dBA L_{eq} if feasible noise controls are not implemented. (SEIR, p. 18-8.) The project-level noise analysis imposes no such measures as mitigation, reasoning that construction noise is exempt from the County's noise ordinance. As to operations, the analysis likewise acknowledges that "predicted noise levels at noise-sensitive receptors along Curtola Ranch Road near the project access driveway and Bell Road near the Twilight Ride driveway are expected to increase by more than 3 dBA." (SEIR, p. 18-9.) But again no mitigation is imposed for this significant impact.

The fact that the Project will not rely on public water or sewer systems does not mean that it will not result in significant cumulative impacts to groundwater and water quality. (SEIR, p. 18-11.) Indeed, the SEIR acknowledges that an existing well in HFRP had to be abandoned due to low yield. (SEIR, pp. 11-5 to 11-6.)

The operational GHG threshold is not 10,000 MT CO₂e per year as stated on page 18-11. The analysis of cumulative GHG impacts relies on consistency with the MTP/SCS. (SEIR, p. 18-11.) But the SEIR states multiple times that the Project is not consistent with the MTP/SCS. (SEIR, pp. 8-12, 8-19, 8-21, 8-22, 8-23.) Why is this not identified as a significant cumulative impact?

As noted above, the SEIR's statement that trails and bridges would be a minimum of 8-12 feet wide and designed to accommodate emergency vehicles is not accurate. (SEIR, p. 18-12; *see also* SEIR, p. 3-44 [noting that multi-use trails would be graded to 5 feet wide].) The SEIR states that cumulative wildfire risk will be "offset by increased tax revenues that will provide additional resources for various park services, including fire." (SEIR, p. 18-12.) The fact that tax revenues is provided for public services is not relevant to the environmental impact at issue—exposure to wildfire risk. Even if it were, the Project does not generate tax revenue, so how does it mitigate its fair share of cumulative wildfire risk?

G. The Project may result in numerous significant impacts that were scoped out of, and not analyzed by, the SEIR.

I73-35

The scope of the proposed SEIR improperly excludes potentially significant impacts to (1) Forestry Resources, (2) Energy, (3) Mineral Resources, (4) Population and Housing, and (5) Recreation. Unless and until those areas are more fully addressed, the scope of the SEIR is improperly limited and erroneously excludes areas requiring further assessment. While the CEQA Guidelines call for emphasis and "focus" on the significant environmental impacts of a project, the authority to use such focus is misapplied in the SEIR. For example, CEQA Guidelines Section 15143 explains that such focus may be used to limit the analysis in an EIR *only* as to such

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Cont'd ↑ impacts that the initial study properly shows to be “clearly insignificant and unlikely to occur . . .” The SEIR, by contrast, excludes from consideration numerous effects that it has not shown to be clearly insignificant and unlikely to occur.

H. The SEIR must be recirculated for public review and comment.

I73-36 The SEIR failed to adequately analyze the Project’s traffic, air, noise, and other resource topics, as detailed above. Moreover, the analysis of alternatives was deficient because it failed to analyze a reasonable range of alternatives that would avoid or substantially lessen the Project’s significant environmental impacts. For any of these reasons, the SEIR was fundamentally and basically flawed and conclusory in nature such that meaningful public review and comment were precluded. Moreover, had the analysis been done correctly, the SEIR would have disclosed new or substantially more severe environmental impacts. The SEIR must be recirculated for public review before the County can legally take action on the Project. (Public Resources Code § 21092.1; CEQA Guidelines § 15088.5(a).)

III. Conclusion

I73-37 While it is plain that an EIR is needed in connection with this proposed Project, it is also clear that the SEIR should be more complete than the version that was provided for public review and comment. The current version of the SEIR fails to adequately analyze the “whole of the project,” thereby thwarting effective public review and comment on the Project. In several key areas, it fails to thoroughly and adequately identify the Project’s significant environmental impacts and propose feasible mitigation measures and alternatives to avoid or substantially lessen such impacts. As such, the SEIR fails to comply with CEQA, and the SEIR must therefore be revised, corrected, and recirculated with all of the analysis and other content required by CEQA before the County may lawfully take action on the Project.

Thank you for your consideration of our client’s comments on the SEIR. Please do not hesitate to contact the undersigned with any questions concerning this correspondence.

Very truly yours,
RUTAN & TUCKER, LLP

Matthew D. Francois

cc (via e-mail):
Honorable Cindy Gustafson and Members of the Board of Supervisors
Honorable Anders Hauge, Chairman, and Members of the Planning Commission
Karin Schwab, Esq., County Counsel
Andy Fisher, Parks Administrator
Peter & Jacqueline Caswell
Lloyd Harvego
Kathryn Oehlschlager, Esq.

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Exhibit A



May 19, 2020
Job No. 1559

Rutan & Tucker, LLP
455 Market Street, Suite 1870
San Francisco, CA 94105

Attn: Mr. Matthew D. Francois

Re: Hidden Falls Regional Park Trails Expansion Project – Subsequent EIR (State Clearinghouse No. 2007062084)

Dear Matt,

Based upon a May 7, 2020 site visit and review of pertinent materials and documents, I am writing to provide the following observations and opinions in regard to the roadway improvements that would be needed to provide safe and adequate public access to the parking/staging area for the proposed Harvego Bear River Preserve (Harvego Park), part of the Hidden Falls Regional Park Trails Expansion Project (Project) referenced above.

Existing Site Conditions:

Curtola Ranch Road, the existing private roadway which is proposed to be the primary access to the Harvego Park staging area, transits through lands of Harvego Real Estate LLC being assessor parcel numbers 026-370-044-00 and 026-370-056-000, Placer County, California. The existing private roadway can be characterized as a rural gravel surface private driveway varying in width from 10 feet to 12 feet. The private driveway has several posted signs to advise users to keep speeds down to avoid the creation of large vehicle “dust trails”.

As shown on the attached exhibit, the proposed access road corridor has been divided into four reaches, labeled Reaches “A” thru “D” respectively. The proposed Project road alignment has been divided into these respective “Reaches” as each Reach has distinctive edge conditions which must be considered and evaluated separately as to construction impacts and potential habitat mitigation requirements.

Reach “A”:

Reach “A”, approximately 1,410 lineal feet in length, comprises the first segment of the four-segment proposed public access road. This particular Reach is bordered by the Nevada Irrigation District (NID) canal to the east and the Auburn Valley Country Club Golf Course to the west. The area between the proposed public access road and the active golf course fairway, which varies in width from 150 feet to 300 feet is comprised of undeveloped moderate to dense native woodlands. The woodland area falls away from the current road with a vertical differential varying from ten to twenty feet. The NID canal sits approximately 2 to 3 feet below the easterly edge of roadway grade. Existing overhead electric (OHE) lines generally follow the road

alignment in this reach. The NID channel maintains a turnout at the project entrance to provide water to the active Auburn Valley Country Club Golf Course.

Reach "B":

Reach "B", approximately 1,050 lineal feet in length, comprises the second segment of the proposed public access road. This particular Reach is bordered by undeveloped lands consisting of low to moderately dense native woodlands and grasslands. Adjacent lands consist of rolling topography varying in height from 1 to 5 feet above the existing road grade.

Reach "C":

Reach "C", approximately 290 lineal feet in length, comprises the third segment of the proposed public access road. This particular Reach consists of a narrow gravel road which runs along the top of an earthen dam impounding a small water storage area to the east. The westerly edge is bordered by wetland elements and a small drainage channel. Adjacent grades vary from 5 to 20 feet below the westerly edge of roadway.

Reach "D":

Reach "D", approximately 870 lineal feet in length, comprises the fourth segment of the proposed public access road. This particular Reach is bordered by undeveloped lands consisting of low to moderately dense native woodlands and grasslands with varying topographic edge relief varying from 1 to 5 feet. This reach terminates at the entrance to the proposed new Harvego Park staging area. A new bridge will need to be constructed at the terminus of this reach to cross an existing drainage channel. The channel depth in this location is quite deep, on the order of 15 to 20 feet in depth.

Road Section:

It is this office's understanding that Placer County and Placer Land Trust have an easement to use Curtola Ranch Road for a limited number of docent-led tours per year and that the easement expressly precludes any public use until the road is improved to an all-weather roadway surface of not less than 20 feet in width.

It is this office's opinion that the roadway should be a dedicated public roadway since it will provide "public access" to a proposed "public amenity". As a public roadway the minimum roadway section should be 24 feet providing for two, 10-foot travel lanes with 2-foot paved shoulders and fog line. Additional gravel shoulders, three feet in width, should be provided for all reaches. This results in a minimum road section of 30 feet.

The pavement section should be a minimum of 3-inch asphalt concrete (AC) over 10 inches of class II aggregate base rock, with the pavement section potentially deepened to account for the final anticipated traffic load.

All Reaches will require road widening to perfect the recommended road width of 30 feet. Additional right-of-way will be required along all reach elements to account for grade differentials. All adjacent roadway cuts/fills slopes should be set at 3:1 to promote landscape

placement. It is apparent that the existing easement will not be sufficient to support the necessary improvements from a public safety consideration. In addition, adjacent slope easements will be required to support the edge cut/fill slope elements for the new road improvements.

Specific design considerations for each of the respective Reaches are provided below:

Reach "A":

Reach A is bordered by the NID channel to the east; consequently, all roadway widening will need to be perfected from the westerly edge of the existing driveway. The SEIR references an option to replace the NID canal with an enclosed pipeline and utilizing the reclaimed area east of the existing private road improvements as an area to provide the necessary widened road improvements. This option fails to take in to account that the existing NID canal serves a dual purpose. While the canal conveys irrigation water to the Golf Course facility during summer months, it also functions as a storm drain conveyance facility during winter months, intercepting excess storm flows from the drainage situated east of the private road. The canal's important storm drain function would be severely compromised if the canal were to be encapsulated. Further, the NID canal, though a water transmission facility, does host potential habitat which, if the canal were to be replaced within a closed pipeline would require resource agency permitting and mitigation. NID approval would also be required. The existing NID easement would further require modification and approval from the underlying fee owner(s).

The widening will consist of a fill slope, varying in height from 10 to 15 feet in height to support the westerly widening of approximately 18 feet. The 18-foot road widening and the associated 30 to 45 wide foot fill slope (3:1 embankment slope) will encroach into the adjoining woodlands zone between the existing Golf Course fairway and the existing road edge. The construction activities, especially those in support of the required fill slope, will require the following:

- Removal of all existing trees and shrubbery within the fill area and most probably an additional 15' outside the proposed fill toe (toward the Golf Course fairway) to facilitate construction activities.
- A keyway element to support the 3:1 fill slope. Given the adjoining NID canal, the keyway element will most likely be saturated requiring additional grading remediation efforts to stabilize this area.
- Development of a comprehensive landscape plan to revegetate the new fill slope.
- Development of a comprehensive mitigation plan to address native tree removal and potential wetland(s) impacts.
- The 3:1 fill slope will require the import and placement of approximately 30,000 cubic yards of import fill and potentially 3,000 cubic yards of class 2 base rock for keyway stabilization.
- Relocation of existing OHE poles impacted by road improvements.
- Temporary access control plan to provide access to all existing homeowners impacted by the construction activities.
- Placement of a barrier rail along the edge of the new road improvements adjacent to the NID canal and along the westerly road edge where vertical differentials exceed three feet.

- Modification to NID turnouts, at two locations, impacted by the proposed road improvements.
- A project biologist will be required to assess habitat and wetlands impacts. Impacts to existing habitat and wetlands appear extensive in this reach.
- A project arborist will be required to assess existing trees within the grading impact zone and impose adequate mitigation measures.

The proposed road improvements will be subject to the following design elements and potential regulatory permitting requirements.

- Development of full engineered cross-sections along the entire length of Reach A.
- Geotechnical investigation to establish geotechnical recommendations for all proposed fill operations.
- Tree survey to address all tree species, size, and health, that may be impacted by the proposed fill operations.
- Development of a tree mitigation plan and securing of any required tree removal permits.
- Development of a comprehensive landscape plan to address mitigation requirements and C.3 water quality treatment requirements.
- Assessment of potential existing habitat elements within the construction zone and determination of required mitigation measures.
- Coordination with the local electric company regarding potential pole relocation of or complete OHE undergrounding for public safety purposes. (It should be noted if the OHE is fully undergrounded, all residences pulling power from the impacted OHE lines may/will need to be converted from an overhead service to an underground service.)
- Coordination with NID relative to impacts to their existing improvements.

Reach "B":

Reach B is bordered by adjoining woodlands and native grasslands. Required road widening can be perfected on both sides of the existing private road. The construction activities, especially those in support of the required adjoining cut/fill slopes, will require the following:

- Removal of all existing trees and shrubbery within the cut/fill areas.
- Development of a comprehensive mitigation plan to address native tree removal and potential wetland(s) impacts.
- The 3:1 cut/fill slopes will most likely be perfected with on-site excavation materials. Anticipated cut to fill earthwork volumes are estimated at 5,000 to 6,000 cubic yards.
- Temporary access control plan to provide access to all existing homeowners impacted by the construction activities.
- Security considerations for the existing private ranch facilities at the beginning of Reach "B" (refer to attached exhibit).
- Security considerations at the location where the new public street improvements leave the existing private driveway (refer to attached exhibit).

The proposed road improvements will be subject to the following design elements and potential regulatory permitting requirements.

- Development of full engineered cross-sections along the entire length of Reach B.
- Geotechnical investigation to establish geotechnical recommendations for all proposed cut/fill operations.
- Tree survey to address all tree species, size, and health, that may be impacted by the proposed cut/fill operations.
- Development of a tree mitigation plan and securing of any required tree removal permits.
- Preparation of C.3 treatment zones to address water quality requirements.
- Assessment of potential existing habitat elements within the construction zone and determination of required mitigation measures.

Reach "C":

Reach C is bordered by an existing small water impoundment area to the east; consequently, all roadway widening will need to be perfected from the westerly edge of the existing roadway. The widening will consist of a fill slope, varying in height from 15 to 25 feet in height to support the westerly widening of approximately 18 feet. The 18-foot road widening and the 45 to 75-foot-wide fill slope (3:1 embankment slope) will encroach into the adjoining wetlands. The construction activities, especially those in support of the required fill slope, will require the following:

- Removal/relocation of all adjoining drainage swales, existing wetland elements and shrubbery within the fill area and most probably an additional 15 feet outside the proposed fill toe (away from the impoundment area) to facilitate construction activities.
- A keyway element to support the 3:1 fill slope. Given the adjoining impoundment area, the keyway element will most likely be saturated requiring additional grading remediation efforts to stabilize this area.
- Development of a comprehensive landscape plan to revegetate the new cut/fill slopes.
- Development of a comprehensive mitigation plan to address habitat removal and potential wetland(s) impacts, in particular, at both impound emergency overflow release zones.
- The 3:1 fill slope will require the import and placement of approximately 7,000 to 10,000 cubic yards of import fill.
- Placement of a barrier rail along both edges of the new road improvements for public safety purposes.

The proposed road improvements will be subject to the following design elements and potential regulatory permitting requirements.

- Development of full engineered cross-sections along the entire length of Reach C.
- Geotechnical investigation to establish geotechnical recommendations for all proposed fill operations.
- Assessment of potential existing habitat elements within the construction zone and determination of required mitigation measures. A project biologist will be required to assess wetlands impacts. Impacts to existing wetlands appears extensive in this reach.

Reach "D":

Reach D is bordered by adjoining woodlands and native grasslands. Required road widening can be perfected on both sides of the existing private road. The construction activities, especially those in support of the required adjoining cut/fill slopes, will require the following:

- Removal of all existing trees and shrubbery within the cut/fill areas.
- Development of a comprehensive mitigation plan to address native tree removal and potential wetland(s) impacts.
- The 3:1 cut/fill slopes will most likely be perfected with on-site excavation materials. Anticipated cut to fill earthwork volumes are estimated at 3,000 to 5,000 cubic yards.
- Temporary access control plan to provide access to the existing property owner/rancher located near the proposed construction activities.
- Security considerations for the existing private ranch facilities at the beginning of Reach "D" (refer to attached exhibit).
- Security considerations at the location where the new public street improvements leave the existing private driveway (refer to attached exhibit).
- Installation of a new bridge and bridge footings to cross the existing drainage channel.

The proposed road improvements will be subject to the following design elements and potential regulatory permitting requirements.

- Development of full engineered cross-sections along the entire length of Reach D.
- Geotechnical investigation to establish geotechnical recommendations for all proposed fill operations and bridge footing setback & design criteria.
- Assessment of potential existing habitat elements within the construction zone and determination of required mitigation measures.
- Engagement of a bridge designer.
- Introduction of C.3 water quality treatment elements in support of the new public road improvements.

Proposed Park Staging Area:

The proposed park staging area encompasses approximately 3 acres. Cut/fill operations could be as high as 30,000 cubic yards.

Here are a few implications associated with the Harvego Park staging construction and long-term operations:

1. All construction equipment and materials would have to cross Reach C and the new bridge at the end of Reach D. The design for Reach C would have to assess the impact of heavy equipment and equipment transports on the existing dam/levee improvements.
2. The fill element in this area may adversely impact excess storm flows leading to flooding impacts and the need for higher impound elevations. This issue requires further evaluation.

3. Privacy and security issues will adversely impact the Caswells once the Project improvements are perfected. The SEIR and related documents do not appear to take into account or disclose the traffic and related impacts associated with similar improvements, which tend to be quite popular.
4. Trespass issues will most likely plague this area as hikers/bikers do not tend to stay on designated trails.
5. The helipad will create noise impacts and privacy concerns to the Caswells and other immediate residences.
6. The preliminary Septic Design was performed by Septic Design, Inc. The preliminary report indicates that the onsite soil/soil strata is only suitable for a pretreatment system. The preliminary design assumes 260 vehicles per day with a computed sewage design flow of 3,250 gallons per day. The system requires pumping which must rely upon a reliable, continuous supply of power. Given the recent history and likely future of rolling blackouts, the site should provide for a reliable backup power system. Any backup power will rely upon a generator which will produce background noise which was not analyzed in the SEIR. The 260 vehicles per day projection may be underestimated given the popularity of the other County Park facilities and documented neighborhood complaints regarding parking and staging issues.

I trust this provides you with the information that you require. If you have any questions or require additional information, please contact me at this office.

Sincerely Yours,

Mike

Michael Milani
Project Manager
RCE 35121 exp 09-30-2021
PLS 5311 exp 12-31-2021

MEM:

Attachments: Hidden Falls Exhibit

RESPONSE TO COMMENT LETTER I73: PETER AND JACQUELINE CASWELL VIA RUTAN & TUCKER

Response to Comment I73-1

The commenter appreciates the opportunity to submit comments on the proposed project on behalf of their clients, Peter and Jacqueline Caswell, who have concerns with the adequacy of the Draft SEIR. Comment noted. No further response is required.

Response to Comment I73-2

The commenter summarized the concerns with the Draft SEIR, requests the comments and questions be addressed, and that a new and more comprehensive EIR be prepared and circulated for public review and comment prior to any action by the County on the proposed project. Please see Responses to Comments I73-3 to I73-6, below.

Response to Comment I73-3

The commenter believes the HFRP and its surroundings are already severely stressed due to the County's failure to adequately manage visitors and will become even more so as a result of the proposed project. The commenter specifically has concerns regarding the Harvego expansion area accessed through private roads Auburn Valley Road and Curtola Ranch Road. The commenter notes that the easement the County and PLT have acquired to use Curtola Ranch Road for a minimal number of docent-led tours per year precludes any public use until the road is improved; however, the project proposes to allow public use in Phase 2 prior to road improvements in Phase 3. Also, the commenter has concerns that a road on an existing dam would not be widened.

The commenter summarizes various project components.

No specific response is required. The County has been proactively managing visitor use at Hidden Falls Regional Park for years and recently introduced a reservation system that further has successfully managed the number of visitors to prevent parking issues. The proposed project specifically provides additional access points to the expanded trails network, which will help ease traffic and parking congestion at any particular entrance. The County disagrees with the statement about the County's failure to adequately manage visitors. The Draft SEIR analyzes potential impacts related to traffic and roads, including private roads, consistent with the requirements of CEQA. Development of the Project would take place in accordance with the terms of easements in place at the time of development.

The existing cattle operation on the Harvego Bear River Preserve currently utilizes large machinery (cattle-hauling trucks, etc.) to cross the dam and there have been no known issues with the dam's integrity. Placer County Fire/CAL FIRE personnel have visited the dam site and have not raised any concerns with being able to drive across the dam with their fire apparatus. Additionally, docent-led tours currently cross the dam and there have been no reported issues with the dam's integrity. The roadway on both ends of the dam would be widened to 20 feet as part of the Phase 3 improvements included in the proposed project. Traffic would be controlled with stop bars and pull-out areas on both sides of the dam, as is customary with other one-lane bridges throughout the County. Please also see Draft SEIR Section 8.4 "Impacts" in Chapter 8.0 "Transportation and Circulation" for an analysis of impacts on transportation and circulation and Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I73-4

The commenters question the use of a Subsequent EIR as the appropriate CEQA compliance document.

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. CEQA Guidelines, Sections 15162(a) and 15163, state that when an EIR has been certified for a project, no subsequent or supplement to an EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

- (1) substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects;
- (2) substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR.
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR.
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives.
 - (D) Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

In January of 2010, the Placer County Planning Commission approved a Conditional Use Permit (CUP No. 20090391) and certified an EIR (State Clearinghouse No. 2007062084) for the HFRP already open to the public. The Project consists of modifications to existing CUP No. 20090391, and these modifications were determined to be substantial new information that could increase impacts from those listed in the 2010 HFRP Certified EIR. Consequently, the County has elected to prepare a Draft SEIR on the Project. The focus of the SEIR is to determine whether the Project and associated improvements would result in impacts not discussed in the prior Certified EIR, substantially increase the effect compared to that discussed in the prior Certified EIR, or would be consistent with the findings of the prior Certified EIR. The Draft SEIR identified additional alternatives to address the significant impacts of the proposed HFRP Trails Expansion Project. Consistent with CEQA Guidelines Section 15162, the analysis contained in the SEIR is limited to

the incremental changes associated with construction and operation of the proposed trails expansion when evaluating whether the modifications to the original CUP would result in a significant impact. The County finds use of a SEIR appropriate and fully consistent with the CEQA guidelines.

Response to Comment I73-5

The commenters state they believe that the project description is inadequate, lacking specific information for improvements of Curtola Ranch Road and associated impacts.

Pursuant to CEQA Guidelines, an EIR project description should contain the location and boundaries of the proposed project by way of a map; a description of the project's technical and environmental characteristics; and a statement briefly describing the intended use of the EIR (CEQA Guidelines Section 15124[a]-[d]). The project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact" (CEQA Guidelines Section 15124). A general conceptual discussion of the main features of the project is sufficient (CEQA Guidelines Section 15124[a], [c]; *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal. App. 4th 20, 27-28 [1999]).

Chapter 3.0, "Project Description" of the Draft SEIR provides extensive detail in an accurate, stable, and finite project description that presents the scope of the Project and includes all of the components identified in Section 15124 of the CEQA Guidelines Section 15124. Chapter 3.0 includes maps to identify the location of the Project, the existing HFRP, and 2019 project components. The project description identifies the background and history of the HFRP; Project objectives; proposed land uses; their location and phasing; and substantial detail on construction, operation, and maintenance of new facilities.

The commenter references roadway improvements required for implementation of the Project contained in a letter from Milani & Associates and attached as Exhibit A to the comment letter.

The attachment is noted and has been included in this document for informational purposes. The proposed improvements are believed by the commenter and their consultant to be necessary; however, please note that they are not required as a result of implementation of the project. Please see Response to Comment I73-3 above.

Proposed improvements to Curtola Ranch Road are described in the project description, along with impacts (such as wetland impacts and loss of oak woodland that could result from various project component. The exact acreage of impacts for each project component cannot be determined until advanced designs are available. However, the Draft SEIR contains mitigation measures to apply to avoid, minimize and offset each impact. Further measures may be determined during the project regulatory permitting process (such as with the U.S. Army Corps of Engineers), once specific phases of the project move forward.

Response to Comment I73-6

The commenter believes the impacts of recreational activities within the project area have not been analyzed including special events, cross country track meets, film and theater production, and outdoor education classes. The commenter also has concerns related to security.

Please see Master Response 4 – Land Use Compatibility.

Response to Comment I73-7

The commenter believes that any future trails should be analyzed in the Draft SEIR.

As stated in the project description and cited by the commenter, additional trails “could be added in the future where the County’s trail easements are blanket in nature”. This statement neither means that trails in these areas will be developed, nor that the location of these trails could be reasonably known at this time. The statement was merely included for disclosure purposes, to distinguish between regular right-of-way easements that allow a single lane trail to pass through, and “blanket” easements, which allow for a wider range of options. If additional trails were to be developed in the future in areas with blanket easements, a CEQA analysis would be conducted at such time, when details about the trails would be available.

Response to Comment I73-8

The commenter believes the project description is inadequate because it does not identify several discretionary approvals that might be needed to implement the project. The comment specifically identifies the potential need for an NID canal encroachment permit and various County permits, including grading, building, tree removal, well, amendments to Williamson Act contracts, and deviations from County Road Standards.

Draft SEIR Chapter 3.0 “Project Description,” Section 3.7.1 “Approvals Required by Placer County” discusses necessary approvals from the County, and Section 3.7.2 “Approvals Issued by Other Agencies,” discusses necessary approvals from other agencies. A canal encroachment permit from Nevada Irrigation District (NID) has been added to the Final SEIR Chapter 3.0 “Revisions to the Draft SEIR” as well as County permits for buildings and tree removal. The listed County permits are all ministerial permits that would not require discretionary approval. Williamson Act contracts allow for the proposed uses of the project and would not require an amendment to accommodate the proposed project. An Authority to Construct (ATC) permit from the PCAPCD would not be required during construction and an ATC would not be required during operation due to the lack of stationary sources. Helicopter landing zones would be covered under the CUP Modification, and would not require a separate land use permit.

Response to Comment I73-9

The commenter comments on the public comment process.

Please see Master Response 1 – Public Comment Process. The current change in normal business procedures due to the COVID-19 pandemic was not a foreseeable circumstance that could have been predicted at the time the Draft SEIR was published. Placer County, like all public agencies in California, is practicing adaptive management to allow business to proceed, while complying with State mandates for epidemic management. Despite the County facility closures during the pandemic, the Draft SEIR continued to be available on the County’s website, and the review time was extended from 60 days to 90 days. These practices are entirely consistent with the Governor’s Office of Planning and Research (OPR) recommendations.

Response to Comment I73-10

The commenter believes the project conflicts with Williamson Act contracts.

Compliance with the Williamson Act is addressed throughout Draft SEIR Chapter 4.0, “Land Use and Agricultural Resources,” and analyzed in detail in Impact 4-1. The impact is determined to be Less than Significant (Consistent with prior analysis in 2010 HFRP Certified EIR).

Please also see Master Response 5- Agriculture.

Response to Comment I73-11

The commenter has concerns related to agricultural zoning.

Please see Response to Comment I73-10 above. Agricultural zoning is addressed in the same impact discussion.

Response to Comment I73-12

The commenter is concerned that the project will convert farmland to non-agricultural use.

Please see Response to Comment I73-10 above. Agricultural zoning is addressed in the same impact discussion.

Response to Comment I73-13

The commenter believes the project conflicts with policies adopted to avoid or mitigate environment effects related to agriculture.

Compliance with the Williamson Act is addressed throughout Draft SEIR Chapter 4.0, “Land Use and Agricultural Resources,” and analyzed in detail in Impact 4-1. The impact is determined to be Less than Significant (Consistent with prior analysis in 2010 HFRP Certified EIR). Please also see Master Response 5 – Agriculture.

Response to Comment I73-14

The commenter is concerned with impacts regarding soils, geology, seismicity, and mineral resources.

The County disagrees with the statement that the Draft SEIR should have analyzed trails in steep terrain and septic systems in areas unsuitable, etc. The project description is clear in how trails and supporting infrastructure will be sited to avoid steep areas, areas unsuitable for infrastructure, and how the County will comply with all applicable design and other standards. Likewise, the technical analysis presented in the various resource sections of the Draft SEIR is sufficient to support sound impact conclusions based on substantial evidence. No revisions are necessary.

Response to Comment I73-15

The commenter believes there could be impacts to cultural and tribal cultural resources. The resources of concern include historic resources (Rock Walls [HF-2016-1] and Water Conveyance Ditch and Stacked Rock Wall [HF-2017-1]), Tribal artifacts and sites, the lode gold mine on the Taylor Ranch property, and unanticipated discoveries.

Cultural resources investigations by qualified archeologist were conducted for all project sites of potential ground disturbance and the findings in the Draft SEIR were made based on the results of these studies. In addition, the

County conducted Native American Tribal consultation pursuant to AB 52, including meeting onsite with tribal representatives. The project, as presented in the Draft SEIR takes the results of the studies and consultation into full consideration. Furthermore, the Draft SEIR includes a set of mitigation measures to avoid and minimize impacts on cultural resources (including historic, archeological, and tribal cultural resources), and proposed mitigation measures of inadvertent discoveries. These measures have been developed in coordination with local tribes consulted during preparation of the Draft SEIR and were based on a request from the local tribes. No revisions to the Draft SEIR or mitigation measures are necessary.

Response to Comment I73-16

The commenter believes the visual impact analysis is flawed.

The County disagrees with the allegation that the visual analysis is flawed, inconsistent with the finding of the prior EIR, or inconsistent with County standards. Key observation points were included for disclosure reasons. The nature of development proposed (trails, supporting infrastructure, rural parking lots and road improvements) are consistent with the rural nature of the park and surroundings, and the depiction of existing facilities as examples is appropriate. The Draft SEIR acknowledges that impacts would occur along Curtola Ranch Road, if widened, but finds this impact less than significant with mitigation. This is the appropriate finding. The rural nature of the park and surrounding areas have been taken into consideration by all current and proposed improvements at Hidden Falls Regional Park, and the commenters provide no specific evidence that the mitigation measures, as proposed, would result in significant and unavoidable impacts beyond those discussed in the Draft SEIR. No changes are necessary.

Response to Comment I73-17

The commenter believes the project conflicts with plans or programs addressing the circulation system.

The Draft SEIR describes the entrance to the Harvego Ranch Reserve on page 3-26 and notes that the entry gate would be accessed via Auburn Valley Road and Curtola Ranch Road. Proposed improvements are noted in Table 3-3 and Exhibits 3-13 and 3-14. The adequacy of this route was evaluated in the Draft SEIR traffic study starting on page 47. While other HFRP Trails Expansion areas propose new access intersections, the “entrance” to Curtola Ranch Road is the existing Auburn Valley Road / Curtola Road intersection. The issues associated with use of this existing intersection differ from those considered for the new Garden Bar Road and Twilight Ride intersections where the County standards and policies for new construction are applied. In this case the HFRP Trails Expansion Project would not increase the number of left turns from eastbound Auburn Valley Road onto Curtola Road, and a left turn lane would not be needed.

The County disagrees that the proposed project, as presented in the Draft SEIR conflicts with existing plans and programs. The Draft SEIR was prepared in cooperation with all applicable County Departments, including the Public Works Department, and the project description, impact analysis, and proposed mitigation measures were found to be appropriate. No further response is required.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I73-18

The commenter disagrees with the analysis for trip generation.

Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I73-19

The commenter disagrees with the level of service analysis.

The commenter states that recent case law does not prohibit the County from considering LOS as a significant impact. However, as stated in the Draft SEIR, the State has eliminated the use of LOS as a significant impact through Public Resources Code 21099(b)(2) and the certification of the CEQA Guidelines in late 2018. The traffic analysis describes LOS results based on CEQA guidelines and Placer County’s methodology of assessment. The Draft SEIR does not include LOS analysis as a significance criteria.

Typical traffic analysis addresses weekday a.m. and p.m. peak hour conditions. For the HFRP Trails Expansion Project the traffic analysis addressed those time periods of peak background traffic volume (weekday p.m. peak hour) as well as the peak hour of HFRP use which was the peak hour on Saturday. Background traffic volumes on area roads are typically lower during the weekday a.m. peak hour (7:00 to 9:00 a.m.), and the volume of traffic to and from HFRP is less than at other times. Thus, analysis of a.m. peak hour conditions was not included. These are the same analysis hours addressed in the Winery and Farm Brewery Zoning Text Amendment Project’s DEIR.

The commenter notes that the traffic analysis did not analyze freeway volumes, even though visitors come from outside the County. As stated in the Draft SEIR, the VMT analysis did analyze the full length of trips generated from visitors outside the County. Additionally, no responses to the Notice of Preparation asked for evaluation of that facility. Traffic generated by the proposed project would be minimal in relation to existing traffic volumes on Interstate 80.

The traffic analysis addressed Auburn Valley Road based on evaluation of traffic volumes at the location with greatest traffic volume (i.e., immediately west of Bell Road) and at a location west of Curtola Ranch Road which would be expected to have the lowest background volume. These locations were described as Bell Road to View Ridge Drive and Fairway Court to Curtola Ranch Road and these segments represent the high and low volume ends of the background conditions.

Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I73-20

The commenter compares VMT from the proposed project to the average daily VMT in Placer County, as reported on page 15-6 of the Draft SEIR. However, VMT reported on page 15-6 were incorrect. Refer to Chapter 3, “Revisions to the Draft SEIR Text” of this Final SEIR for the updated VMT data.

The commenter is concerned with the vehicle miles traveled analysis and lack of required mitigation.

As stated in the Project Description, the parking reservation system is already identified as part of the proposed project, therefore it cannot be implemented as a mitigation measure.

The commenter states that addition of bike lanes, transit, and pedestrian improvements all appear to be feasible mitigation. In general, these types of facilities are unlikely to substantially reduce VMT for the proposed project, because most visitors are expected to visit from greater distances. As shown in Table 8-7 of the Draft SEIR, only

6% of all existing visitors to HFRP came from the Auburn area on a peak Saturday. The remaining 94% of visitors traveled an average distance of 20 miles or more to access the existing park. In general, bicycle and pedestrian trips tend to be much shorter in length than vehicle trips. Transit can serve trips of greater distances, but there are no transit services near the proposed project, as discussed below.

As stated in the SEIR, the proposed project can be accessed by on-street bicyclists. Additionally, the County has planned bicycle facilities near the proposed project. However, the SEIR also states that very few visitors are expected to arrive at HFRP by bicycle. Off-road cyclists who would use HFRP facilities would generally not ride their bicycles to the site, as mountain bicycles are preferred for off-road facilities, while road bicycles are preferred for on-road facilities and bicycles are generally not dual purpose. Visitors on bicycles are expected to be a very low percentage of all trips to the proposed project. Those visitors that do use a bicycle to access the park would likely come from nearby locations, resulting in negligible effects on total VMT. As such, new bicycle facilities are considered an infeasible mitigation measure for the VMT impact.

As noted in the SEIR, Placer County Transit provides bus service in unincorporated areas of south Placer County, but services are limited in rural areas near the proposed project. The closest transit route is the Highway 49 route which serves the North Auburn area with one-hour headways. The infrequency of transit service and lack of planned transit near the HFRP Trails Expansion Project make it unlikely for transit to be used to access the proposed project. Expansion of transit to the proposed project is financially infeasible due to low levels of ridership from the project, long headways, and lack of other destinations nearby that could produce ridership. As such, transit expansion is considered infeasible as a mitigation measure.

Also, as stated in the SEIR, the project is unlikely to generate appreciable pedestrian activity due to its rural location. The occasional pedestrian could access the site from nearby residential locations. However, those trips would be very short and infrequent. As such, the reduction in VMT from pedestrian trips is also expected to be negligible, making pedestrian improvements infeasible as a mitigation measure for the proposed project.

Response to Comment I73-21

The commenters state they believe the analysis of hazards related to bikes and traffic and related mitigation measures are inadequate.

The County disagrees. Please refer to Master Responses 2 – Wildfire, Safety, and Emergency Response; and Master Response 3 – Traffic, Circulation, and Parking for additional discussion on these topics. No revisions are necessary.

The Draft SEIR traffic analysis introduces the issue of potential pedestrian conflicts caused by off-site parking on Page 51. The commenter expresses concerns that “No Parking” signage cannot be installed by the County on Auburn Valley and Curtola Ranch Roads, as they are not public roads. The County appreciates the concerns expressed by the commenter regarding the existence of public access along Auburn Valley Road and Curtola Ranch Road, however this is not a CEQA issue, but rather a property rights issue between the project applicant, the County, and any underlying property owners who granted express, implied or prescriptive easements for public access to the County. The County previously provided a staff document dated November 10, 2016, that identified certain public access easement rights along both roadways.

The project traffic added to study area roads represents a relatively small share of the capacity of study area roadways under Placer County guidelines. The HFRP's Saturday traffic contributions summarized in Table 8-14 represent use of the roadway's LOS C capacity that range from <1% to 17%. As concluded in the Draft SEIR, traffic volume increases in that range would not significantly worsen the current situation for bicyclists. In addition, further review of selected study area roadways indicates that there were no reported bicycle related collisions between January 1, 2016 and December 31, 2019.

Upgrading traffic control devices is a common safety countermeasure. The Caltrans Local Roadway Safety Manual, Appendix B lists Measure R22 Install / Upgrade signs as an applicable action of roadways and notes "this strategy primarily addresses crashes caused by lack of driver awareness (or compliance) roadway signing". It is intended to get the driver's attention and give them a visual warning. Measure R23 Install Chevron signs on Horizontal Curves and R24 Install Curve Advance Warning signs are also applicable countermeasures.

The available collision frequency data identified in Table 8-4 (p. 8-10) indicates that the collision rates on Ridge Road from Gold Hill Road to SR 193 and on Virginia Town Road from the City of Lincoln to Gold Hill Road exceed the statewide average for similar facilities. The rates on the other facilities noted in the comment do not exceed the statewide average. Both Ridge Road and Virginiatown Road are more than 5 miles from the closest HFRP entrance, fall outside of traffic study area limits and are not routes that would normally be used to access HFRP. The HFRP traffic on either road would be minimal, no safety impact would be expected, and mitigation is not required.

Response to Comment I73-22

The commenters state they believe that the analysis of emergency access presented in the Draft SEIR is inadequate.

A thorough analysis of the topic was conducted during preparation of the Draft SEIR, and the topic of fire safety is discussed in Draft SEIR Chapters 13 and 17. Please refer to Master Responses 2 – Wildfire, Safety, and Emergency Access, and Master Response 3 – Traffic, Circulation and Parking for additional discussion on these topics. No revisions are necessary.

Response to Comment I73-23

The commenter believes the project conflicts with Levels of Service (LOS) standards and the County's LOS policies as well as County policies to encourage and accommodate non-automobile access.

All relevant County departments were involved in review of the Draft SEIR. Please see Draft SEIR Chapter 19.0, "Report Preparers." Please also refer to Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I73-24

The commenter is concerned with air quality impacts and believes the construction emissions have been grossly under-estimated and the trip generation assumptions are faulty. The commenter is also concerned with health-related effects of all air quality emissions associated with project construction and operations. The commenter believes the Draft SEIR fails to acknowledge and address the project's conflict with policies adopted for the purposes of avoiding or mitigating environmental effects. The commenter believes the Draft SEIR fails to identify potential air quality impacts and designate appropriate mitigation measures or alternatives to reduce impacts. The

commenter notes that the Placer County Air Pollution Control Board (APCD) is not listed as a responsible agency and thus does not appear to have been consulted by the County or furnished with a copy of the Draft SEIR.

The commenters overstate the amount of construction required and the duration. The analysis conducted in support of the Draft SEIR followed standard approved methodology and used the best available data. A detailed air quality evaluation of the project is presented in Section 9.4 of the Draft SEIR and additional details supporting the analysis are presented in Appendix E of the Draft SEIR. Also refer to the detailed response to Comment I183-9 regarding the potential health risks associated with criteria pollutants and additional analyses developed using SMAQMD's draft Project Health Effects Tool (version 2). The Placer County APCD was included in all relevant communication about the project and provided comments on the Draft SEIR (see comment letter L-1 in this Final SEIR). No revisions are necessary.

Response to Comment I73-25

The commenter has concerns about the noise analysis.

The commenters do not provide any data that support their assertions regarding the amount of noise that would be generated by this open space project and the effects of the noise on nearby residents. The analysis conducted in support of the Draft SEIR followed standard approved methodology, used the best available data, and chose representative points for noise measurement. The Draft SEIR was prepared in coordination with all relevant County Departments, to ensure compliance with all applicable County Standards. No revisions are necessary.

Response to Comment I73-26

The commenter is concerned about impacts on hydrology and water quality.

The commenters point out what they believe to be inconsistencies among sections of the Draft SEIR, and allege the amount of ground disturbance is understated, but fail to provide evidence of these allegations or an acreage of disturbance they believe would be more accurate, and why. The analysis conducted in Section 11.0 "Hydrology and Water Quality" of the Draft SEIR followed standard approved methodology, used the best available data, and disclosed all reasonably foreseeable impacts on hydrology and water quality. The Draft SEIR includes a comprehensive set of mitigation measures, that, when properly implemented by the responsible party, as stated in the Mitigation Monitoring and Reporting Program (MMRP) for the project (see Chapter 4 of the Final SEIR) would reduce impacts on hydrology and water quality to less than significant. Furthermore, the Draft SEIR was prepared in coordination with all relevant County Departments, including Environmental Health, to ensure compliance with all applicable County Standards. No revisions are necessary.

Response to Comment I73-27

The commenter expresses concerns about impacts to biological resources, which are described in the letter under 9. "Biological Resources."

9. 1st Paragraph: The commenter requests to know why some special-status wildlife species were eliminated from discussion in the Draft SEIR.

Thirteen (13) special-status species were eliminated from further discussion because, as stated in the Draft SEIR, they "have no potential to occur in the project area because the project area is outside of their elevation or

geographical range or because suitable habitat (e.g., vernal pools, open rocky/sandy soil) is not present (Draft SEIR pg. 12-26). The commenters claim that the Draft SEIR states there were 14 special-status species eliminated from discussion; however, this statement is not included in the Draft SEIR. No changes are necessary.

The commenters state that on page 12-27, the California red-legged frog is identified as “Not likely to occur” in Table 12-3. At the end of the table is the “Potential for occurrence definitions”.

The “Not likely to occur” does not negate that the species “potentially occurs”; however, it is not likely. No changes are necessary.

9. 2nd Paragraph: The commenter believes that the project parking area and improvements will be located in places that currently serve as wildlife corridors; however, they provide no evidence to substantiate their claim. The following is stated in the Draft SEIR 12.4.3 “Issues Not Discussed Further”:

The construction and long-term use of the proposed trails, parking areas, road improvements, and two bridges over Raccoon Creek would not substantially interfere with the movement of any resident or migratory fish or wildlife species, nor would it affect important deer migration routes. The proposed pedestrian bridges over Raccoon Creek will span the creek well above the waterline and will not create barriers to movement of fish or other aquatic species.

The proposed project would support the plans and policies of the General Plan. Because the proposed project would have no impact on the movement of any native resident or migratory fish or wildlife species, or native or migratory wildlife corridor, or impede the use of native wildlife nursery sites, and would not adversely affect an adopted habitat conservation plan, no further discussion is provided on the topics (Draft SEIR pg. 12-41).

Installation of fencing that would separate the public park lands from privately grazed lands would not prevent any wildlife from moving through the area, as just as the existing cattle fencing is not a barrier to wildlife movement. No revisions are necessary.

9. 3rd Paragraph: The commenter expresses concern regarding impacts to riparian vegetation and states that the Draft SEIR does not adequately analyze and address the project’s impacts to these riparian areas.

Please see Draft SEIR Section 12.4.4 “Impact Analysis” in Chapter 12.0 “Biological Resources”, Impact 12-1 “Biological Resources – Potential Disturbance of Aquatic Habitats and the Native Fish Community” (pg. 12-41), and “Long-Term Effects on Aquatic Habitats and the Fish Community” (pg. 12-43) where impacts on riparian vegetation are analyzed. Avoidance and minimization measures include the following:

- ▶ Mitigation Measure S12-1: Implement Measures to Protect Aquatic Habitats and Native Fish Community
- ▶ Mitigation Measure S12-2: Replace, Restore, or Enhance Affected Jurisdictional Waters of the U.S. and Waters of the State

No revisions are necessary.

9. 4th Paragraph: The commenter believes that Mitigation Measures S12-1, S12-2, S5-1, and 11-1 do not explain how these measures will minimize significant environmental impacts to aquatic habitats, loss of important shaded riverine aquatic habitat function, and increased injury or mortality to fish species.

The mitigation measures outlined in the Draft SEIR and listed in Chapter 4 (MMRP) of this Final EIR have been reviewed by the County. Furthermore, the California Department of Fish and Wildlife (the responsible and trustee agency with regulatory and commentary authority over these resources) has reviewed the measures and provided proposed modifications to them which have been incorporated (see Chapters 3 and 4 of this Final SEIR). None of these modifications result in changes to impact conclusions presented in the Draft SEIR. No further changes are necessary.

9. 5th Paragraph: The commenter believes that Mitigation Measures S12-3 does not explain how this measure will minimize significant environmental impacts on California red-legged frogs.

See Response to Comment 9. 4th paragraph above.

9. 6th Paragraph: The commenter believes that Mitigation Measures S12-4 does not explain how this measure will minimize significant environmental impacts on foothill yellow-legged frogs and western pond turtle.

See Response to Comment 9. 4th paragraph above.

9. 7th Paragraph: The commenter believes that Mitigation Measures S12-5 does not address white-tailed kite, a fully protected species, and grasshopper sparrow, a state species of special concern; however, the mitigation measures would apply to all birds, including these species. If these species were detected during preconstruction surveys, which would be required during the nesting season, non-disturbance buffers would be established during construction to avoid disturbance and “take.”

See Response to Comment 9. 4th paragraph above.

9. 8th Paragraph: The commenters state that Mitigation Measure 12-6 focuses on trees and rock outcroppings and questions the validity of this focus and also asks why ringtail is included in the measure.

Mitigation Measure 12-6 focused on trees and outcroppings, rather than other bat habitat types, because those would be the only potential bat habitat impacted by the project. No mine tunnels, caves, or abandoned buildings would be impacted by the project.

Mitigation Measure 12-6 includes ringtail because it is a revised/updated version of a specific mitigation measure from the prior Hidden Falls certified EIR.

9. 9th Paragraph: The commenter believes the Draft SEIR is inconsistent in reporting the acreage of potential jurisdictional wetlands in the project study area.

The impact acreage of the proposed project was derived by overlaying proposed improvements (trails, parking lots, infrastructure etc.) over a jurisdictional delineation of wetland and other waters of the United States (WUS), as determined by a technical wetland delineation conducted using the U.S. Army Corps of Engineers 1987 wetland delineation manual and recent Supplement for the Arid West. The impact analysis distinguishes between permanent impacts (wetland or WUS permanently lost) vs. temporary impacts (wetland or WUS temporarily

impacted during construction, but ultimately restored in situ). The impact table on page 12-51 of the Draft SEIR summarized temporary impacts, while the impact discussion also discusses permanent impacts. However, the acreages provided appear correct, based on the current level of design and best available data. Ultimately, the exact impact acreage will be determined during the permitting process, when advanced designs are available. However, the estimated potential acreages appear correct, and there is no evidence that the impact acreage should be larger, as alleged by the commenter, or that the mitigation measures, as proposed, would not result in reduction of these impacts to less than significant. No revisions are required.

9. 10th Paragraph: The commenter states that there are no surveys or other data to justify the figures in Table 12-5.

Please see explanation in the previous paragraph as to how the impact acreage was derived. The Source is given as AECOM 2019, which means impacts were calculated by AECOM in 2019 based on GIS overlays of proposed improvements over delineated wetlands. No revisions are necessary.

The commenter believes the description of the impact as “temporary” is incorrect.

The Draft SEIR states in the text on page 12-52 “the project would result in temporary impacts *up to* 0.317 acre of potentially jurisdictional waters of the United States.” This is a correct statement. The Draft SEIR states that, “of this total, permanent impacts of trail construction are *estimated* to be 0.297 acre.” This is an estimate that assumes a worst-case scenario for disclosure purpose and the actual acreage could be less. No revisions are necessary.

The commenter believes that, in light of the roadway improvements needed to access the Harvego parking lot and staging area, the affected wetlands acreage appears to be grossly understated.

The commenter provides no evidence to support this claim. No revisions are necessary.

9. 11th Paragraph: The commenter believes that Mitigation Measure S12-2 does not explain how this measure will minimize significant environmental impacts to wetlands.

Please see response to 9th paragraph above. No revisions are necessary.

9. 12th Paragraph: The commenter believes that Mitigation Measure S12-7 does not explain how this measure will minimize significant environmental impacts to trees.

Please see response to 4th paragraph above. No revisions are necessary.

9. 13th Paragraph: The commenter believes the Draft SEIR fails to acknowledge and address conflicts with policies adopted for the purposes of avoiding or mitigating environmental effects, such as protection of wetland communities and related riparian assets.

The Draft SEIR includes mitigation measures to avoid and minimize impacts to these resources, and if permanent impacts to wetlands occur, they will be fully mitigated as required by the resource agencies or in compliance with the PCCP. The PCCP is described in detail on page 12-38 of the Draft SEIR and using the PCCP as mitigation options is described in detail in several of the biological mitigation measures. To clarify the consistency, the following sentence has been added to the second paragraph of Section 12.4.3, titled “Issues Not Discussed Further,” on page 12-41 of the Draft SEIR:

The proposed project would support the plans and policies of the General Plan. Because the proposed project would have no impact on the movement of any native resident or migratory fish or wildlife species, or native or migratory wildlife corridor, or impede the use of native wildlife nursery sites, and would not adversely affect an adopted habitat conservation plan, including the PCCP if adopted, no further discussion is provided on the topics. Therefore, there are no conflicts with the referenced policies. No further revisions are necessary.

9. 14th Paragraph: Please see response to 9. 13th Paragraph.

9. 15th Paragraph: Please see response to 9. 13th Paragraph.

9. 16th Paragraph: Please see response to 9. 13th Paragraph.

9. 17th Paragraph: The commenter states that “Mitigation Measure S12-2 allows the County to avoid coordination with federal and state agencies as required by Policy 6.B.1.”

This is a false statement as Mitigation Measures S12-2 states, “Authorization for the fill of jurisdictional waters of the United States shall be secured from USACE through the Clean Water Act (CWA) Section 404 permitting process before any fill is placed in jurisdictional wetlands.” In the event the County utilized the PCCP or the Voluntary Interim In-Lieu Fee instead, USACE and Regional Water Quality Control Board (RWQCB) requirements would be satisfied as they are partners in these programs. Placer County has been in close cooperation with state and federal agencies in bringing the PCCP online in the near future, and the agencies have been provided with ample opportunity to comment on the Draft SEIR. No revisions are necessary.

Response to Comment I73-28

The commenter references various excerpts from the Public Services and Utilities Section of the DEIR, with the main comments referring to emergency access.

Please see Master Response 2 – Wildfire, Safety and Emergency Access. Also, as mentioned in previous responses, all relevant County departments participated in the development of the Draft SEIR. As this is a County proposed project, the determination of consistency and adequate analysis, and compliance with County standards is up to the County as the lead agency. No revisions are necessary.

Response to Comment I73-29

The comments reference various excerpts from the Hazardous Materials and Hazards Chapter of the Draft SEIR, some referring to emergency response, but also to construction worker exposure and stock ponds.

Please see Master Response 2 – Wildfire, Safety and Emergency Access. Also, as mentioned in previous responses, all relevant County departments participated in the development of the Draft SEIR. As this is a County proposed project, the determination of consistency and adequate analysis, and compliance with County standards is up to the County as the lead agency. It is unclear what specific revisions the commenters feel would be required. No revisions are necessary.

Response to Comment I73-30

The commenters reference various things they see as deficiencies with the Greenhouse Gas (GHG) Emissions and Energy section of the Draft SEIR.

The County disagrees. The analysis used in the support of the Draft SEIR uses standard methodology and the impact conclusions are supported by evidence from the modelling conducted in support of the project. No revisions are necessary.

Response to Comment I73-31

The commenters express concern regarding wildfire.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I73-32

The commenters state that the SEIR improperly defers mitigation to a later time.

Mitigation measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards (Guidelines Section 15126.4).

The specific design of the mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884; *Poet, LLC v. California Air Resources Board* (2013) 217 Cal.App.4th 1214; *Sacramento Old City Association v. City Council* (1991) Cal.App.3d 1011, 1028-1029).

The mitigation measures included in the Draft SEIR and included in the MMRP in this Final SEIR clearly indicated when they will be performed, who is responsible for implementing the measures, and include performance standards, where appropriate, so that the mitigation is not deferred.

Response to Comment I73-33

The commenters allege that the Draft SEIR fails to analyze a reasonable range of alternatives.

The Draft SEIR provides a reasonable range of alternatives sufficient to foster informed decision-making. Section 15126.6(a) of the CEQA guidelines describes the process for the selection of alternatives:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

An EIR need not consider every conceivable alternative to a project (CEQA Guidelines Section 15126.6[a]). Nor does an EIR need to consider an alternative that is remote or speculative. What constitutes a “reasonable range” of alternatives will vary with the facts of each project and should be guided only by the purpose of offering substantial environmental advantages over the project proposal that may be “feasibly¹ accomplished in a successful manner” considering the environmental, social and technological factors involved.

In identifying potentially feasible alternatives to the project, the ability of alternatives to meet most of the project’s objectives was considered. The County finds that a good-faith effort was made to evaluate a reasonable range of potentially feasible alternatives to the proposed project that could feasibly obtain most of the basic objectives of the proposed project.

The project objectives presented in the Draft SEIR provide the framework for defining the possible alternatives. The evaluation of alternatives presented in Chapter 17.0, “Alternatives,” of the Draft SEIR considered the potential for the alternatives to avoid or substantially lessen any of the significant effects of the project, as identified in this SEIR.

While Alternative 2 would reduce significant project impacts, it would not eliminate the significant and unavoidable impacts to traffic, and it would not fully meet the project objectives. Alternative 2 would also not provide the same level of benefit to the community offered by the project because it reduces the number of water tanks and helipads for use in fighting wildfires. In addition, Alternative 2 would not provide any equestrian facilities at either the Garden Bar or Harvego Preserve entrances, and no permanent restroom would be provided at the Harvego Preserve. Objectives not as fully achieved with Alternative 2 as with the proposed project include:

- ▶ Implement the recreational resource objectives of the Placer Legacy Open Space and Agricultural Conservation Program (available at <https://www.placer.ca.gov/3420/Placer-Legacy>), beginning on page 3-17 that aim to “...enhance recreational opportunities in the County by improving public trail access, including the construction of staging areas and parking lots, as well as the purchase of public access easements on private land to provide connections to public land and city trail connections” and “provide regional recreational facilities in the foothill region, supplementing the recreation opportunities provided on public lands to the east and municipal park facilities in urbanized areas. South Placer residents would be served by one or more large regional parks (300 acres or greater) in a rural setting with a variety of passive recreation

¹ CEQA generally defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account environmental, social, technological, and legal factors.”

opportunities. Such a park may be connected with larger area of protected land, providing additional wildlife habitat value.”

- ▶ Expand the existing multi-use, natural-surface trail system to provide recreational opportunities for the residents of Placer County and the region, while maintaining safety for park users, visitors, and nearby residents.

Please also see Response to Comment I73-30.

Response to Comment I73-34

The commenters state they believe the SEIR fails to consider and discuss cumulative impacts.

As stated in Chapter 18.0, “Other CEQA Sections,” the cumulative impact analysis is based on the State CEQA Guidelines (in Section 15130[b]) that provide the following guidance for conducting an adequate cumulative impact analysis: The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

Section 15130 of the State CEQA Guidelines requires that an EIR discuss cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable.” According to Section 15065, “Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, other current projects, and probable future projects as defined in Section 15130.” The term “considerable” is subject to interpretation. The standards used herein to determine whether an effect is considerable are that either the impact of the project would contribute in any manner to the existing significant cumulative impact, or the cumulative impact would exceed an established threshold of significance when the project’s incremental effects are combined with similar effects from other projects.

As stated in Chapter 18.0 of the Draft SEIR, the environmental influences of past projects and present projects that have been implemented already exist as a part of current conditions in the project area. Therefore, the contributions of past and present projects to environmental conditions are adequately captured in the description of the existing settings within each resource chapter (Draft SEIR Chapters 4.0 through 16.0) and need not be specifically listed in Chapter 18.0. The cumulative impact analysis focuses on the potential cumulative physical changes to the existing setting that could occur as a result of a combination of this proposed trail project and probable future projects that are reasonably foreseeable.

Please see Response to Comments I73-15, I73-16, I73-25, I73-26, I73-27, I73-29, and I73-30. Please also see Master Response 2 – Wildfire, Safety, and Emergency Response; Master Response 3 – Traffic, Circulation, and Parking; and Master Response 5 – Agriculture.

Response to Comment I73-35

The commenters allege that numerous significant impacts were scoped out.

According to CEQA Guidelines Section 15128, an EIR may contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Each resource section of the Draft SEIR provides an adequate and complete discussion of issues that were removed for further consideration. No revisions are necessary.

Response to Comment I73-36

The commenter expresses a general opinion about the adequacy of the Draft SEIR.

The basis for the commenter's opinion is contained in the comments that precede and each comment is more precisely addressed in the responses to comments provided above. As described above, none of the warrants for recirculation are presented based upon the comments. The Draft SEIR meets the standards for adequacy of the SEIR content and process requirements outlined by the CEQA Guidelines. The adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA also does not require revisions to the environmental analysis based upon comments relative to the project merits (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, recirculation is not required.

Response to Comment I73-37

The commenter summarizes concerns outlined in this comment letter and believes the Draft SEIR is inadequate.

Please see Responses to Comments I73-2 to I73-36 above.

2.7.74 LETTER I74

Letter I74

Shirlee Herrington

From: noreply@civicplus.com
Sent: Friday, May 15, 2020 10:12 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Adrian Cesana
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I74-1	Comments
	I fully support the subject project, opening more trail access for bike is always a great thing, just look at the success surrounding states are having. This sport is an excellent vehicle for getting kids and family into a healthy sport, outdoors and can create excellent revenue for surrounding business.
	The mountain bike families love to volunteer time and work to help maintain these trails the learning experience here is amazing and helps build a tighter community with respect for the land owners/managers.
	Add parking, bathrooms whatever it takes, the investment will be well worth it.
	Regards, Adrian Cesana
Attach a document	<i>Field not completed.</i>

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RESPONSE TO COMMENT LETTER I74: ADRIAN CESANA

Response to Comment I74-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.75 LETTER I75

Letter I75

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 9:32 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Patty Campbell Chandler

Email Address (Optional) pcampbellrd@yahoo.com

Agenda Item (Optional) Hidden Falls Expansion Project

I75-1

Comments I support the Hidden Falls expansion project! Hidden Falls is extensively used by athletes, families and equestrians. It is a wonderful park for all with amazing trails. However, the park is often overcrowded. The parking lot is also often full. An expansion would improve the parking situation, reduce impact on the most used trails (particularly Poppy!), while providing additional space for all to enjoy. Please vote to support this project. Thank you.

Attach a document *Field not completed.*

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RESPONSE TO COMMENT LETTER I75: PATTY CAMPBELL CHANDLER

Response to Comment I75-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.76 LETTER I76

Letter I76

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 7:35 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Rick Chase

Email Address (Optional) *Field not completed.*

Agenda Item (Optional) Hidden Falls Trail Expansion Project

I76-1

Comments Hello. I'd like to voice my support for the proposed expansion of Hidden Falls regional park. The expansion will allow the crowds to disburse the crowds so people can enjoy the nature. Trails in the park benefit both the mental and physical health of the community. In my opinion, expansion of the park will help fellow citizen live that healthy lifestyle. Thank You. Rich Chase, Auburn.

Attach a document *Field not completed.*

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RESPONSE TO COMMENT LETTER I76: RICK CHASE

Response to Comment I76-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.77 LETTER I77

Letter I77

Shirlee Herrington

From: Laura Choy <coloralive18@gmail.com>
Sent: Tuesday, April 21, 2020 8:30 AM
To: Cindy Gustafson
Subject: Fwd: Hidden Falls Meeting

Follow Up Flag: Follow up
Flag Status: Flagged

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

From: **Laura Choy** <coloralive18@gmail.com>
Date: Tue, Apr 21, 2020, 8:27 AM
Subject: Hidden Falls Meeting
To: <BOS@placer.ca.gov>

Dear Board of Supervisors,

I77-1 | Thank you for your consideration in cancelling the Hidden Falls public hearing meeting. As you know, there are many of us who are opposed to further development of Rural Placer; especially in areas that have narrow roads that do not allow for heavy traffic, specifically if there was "fire danger".

I77-2 | Our concern is whenever a fire breaks out, people will flood the roads to escape..causing gridlock and leaving little room for first responders, the fire department, etc. We're talking about Bell, Cramer and Lonestar roads. There is talk of expanding Hidden Falls access. Please reconsider this issue!

We, who live here, are much concerned about those who don't care about our neighborhoods, i.e. Mears Rd. leaving trash, not destruction of nearby property, etc. Who is reinforcing the law here?

Please reconsider this issue, as it has negatively affected many of us. We need your support.

Thank you.

Sincerely,

Laura Waite-Choy

(510) 882-4423

RESPONSE TO COMMENT LETTER I77: LAURA CHOY

Response to Comment I77-1

The commenter requests for the May 14, 2020 meeting to be cancelled.

Please see Master Response 1 – Public Comment Process.

Response to Comment I77-2

The commenter expresses concerns about traffic, fire and evacuation.

Please see Master Response 3 – Traffic, Circulation, and Parking; and Master Response 2 – Wildfire, Safety, and Emergency Response.

The commenter expresses concerns about trash, destruction of nearby properties, etc.

Please see Master Response 4 – Land Use Compatibility

2.7.78 LETTER I78

Letter I78

Shirlee Herrington

From: Placer County Environmental Coordination Services
Subject: FW: [EXTERNAL] Proposed Hidden Falls access...

From: Laura Choy <coloralive18@gmail.com>
Sent: Monday, May 18, 2020 9:02 PM
To: Sue Colbert <SColbert@placer.ca.gov>
Subject: [EXTERNAL] Proposed Hidden Falls access...

Dear Ms. Colbert,

I78-1 As you may know, many of us are against further access into Hidden Falls. My husband and I live at the end of Bell Rd, not far from Lonestar Rd. There is continued talk of the expansion of Hidden Falls around our neighborhood.

Lonestar, Cramer, Bell and Auburn Valley Roads cannot handle heavy traffic as they are narrow. Two-way traffic is a challenge, even now. If more traffic is permitted, whether cars, bicycles or pedestrians, there is increased danger of collisions; not to mention emergency vehicles coming and going from these areas to assist those in need.

There is a greater possibility of fires when more people are allowed in our area. Many folks that live here have had insurance rates increase or had it cancelled simply because we live in a "dangerous fire area". With the influx of visitors from outside our area, it will become even more of an issue.

Remember Paradise!

I urge you reconsider expanding Hidden Falls, and protect the people that already live here. Thank you.

Sincerely,

Richard and Laura Choy
9180 Upper Valley Rd.
Auburn, CA 95602
(510)882-4423

RESPONSE TO COMMENT LETTER I78: RICHARD AND LAURA CHOY

Response to Comment I78-1

The commenter expresses concerns about traffic, road safety and fire.

Please see Master Response 3 – Traffic, Circulation, and Parking; and Master Response 2 – Wildfire, Safety, and Emergency Response.

2.7.79 LETTER I79

Letter I79

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 4:14 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	David Christensen
Email Address (Optional)	gravy94@hotmail.com
Agenda Item (Optional)	Hidden Falls Trails Expansion Project
Comments	I am in support of the Hidden Falls Expansion Project. It is obvious to me, especially over the last couple months, that people need more spaces to recreate outside. An expansion of the already wonderful Hidden Falls Park would give the public more options to spread out and explore our beautiful area. This would help alleviate the overcrowding of other trails in the area, as well as provide an enjoyable way to maintain our health and sanity. As a Lincoln resident this is the closest park for me and I fully support the expansion. I look forward to more trails to explore with my family.
Attach a document	<i>Field not completed.</i>

I79-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I79: DAVID CHRISTENSEN

Response to Comment I79-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.80 LETTER I180

Letter I180

Shirlee Herrington

From: Valerie Harrison <valgal930@gmail.com>
Sent: Wednesday, April 15, 2020 6:06 PM
To: Cindy Gustafson
Cc: Placer County Board of Supervisors
Subject: Hidden Falls Expansion Public Hearing

Dear Supervisor Gustafson,

I180-1 [I was planning on attending the meeting on May 14, 2020 concerning the Hidden Falls Expansion. I was disappointed to learn that this meeting will not be an open meeting but will be held remotely. I would like to request that this meeting be postponed until such a time that the public can meet openly.

Thank you for your kind consideration and for all you do for the citizens of Placer County.

Sincerely,

Valerie Harrison

Valerie Harrison
6725 Estates Court
Auburn, CA 95602
530-269-2538
valgal930@gmail.com

RESPONSE TO COMMENT LETTER I80: VALERIE HARRISON

Response to Comment I80-1

The commenter requests for the May 14, 2020 meeting to be cancelled.

Please see Master Response 1 – Public Comment Process.

2.7.81 LETTER I81

Letter I81

To: Community Development Resource Agency, Placer County Board of Supervisors, Planning Commission, Park Division, and Placer Land Trust

From: Claire Haydon Christensen, 9955 Spyglass Circle, Auburn CA 95602
Hello,

I am a member of a family that has lived in Auburn for six generations, and this is the first time I have felt that the public officials are trying to cram something through that causes me great concern and fear. Several years ago, a friend and a former mayor of Auburn mentioned to me that a certain individual with the Parks Department was planning a huge expansion in our area, and it was to be his legacy. The Mears Drive mess was rearing its ugly head at that time, and I hoped the news was wrong.

I81-1

Unfortunately, millions of dollars have already been spent on this project, and now we are asked to comment only on the SDEIR, a report that may be all that meets the legal requirements, and could likely be approved in your process, but **lacks respect for the people who will be impacted and glosses over the most important truths.** Those who live here and drive our country roads know first hand what the plan ignores, but no one has asked us. Do any of the Planning Commissioners or staff live here?

The report states that impact to traffic is **"less than significant."**
Did you take into consideration that the access roads are narrow, twisting, with blind curves? What is your plan to make them safe when hundreds of cars and trucks and trailers are added?

Did you take into consideration that many driveways and roads have difficult entrances? What is your plan to make them safe when traffic is increased?

Did you take into consideration that Cramer Road has no center line, as it doesn't meet the minimum width? What is your plan to make it safe?

I81-2

Did you take into consideration that Auburn Valley Road is a private road? Does the county recall when they had no interest in "taking over" this private roads as it didn't meet minimum safety standards? What is your plan?

Did you take into consideration that Curtola Ranch Road is a private driveway? What is your plan?

Did you take into consideration evacuation in the case of a wildfire? (The Paradise disaster is still in our minds). What is your plan?

The report states that there will be a "substantial impact" on Highway 49 between Bell Road and Lone Star Road, a stretch of highway know by all to be deadly. What is your plan to make this safe for the increased traffic?

I81-3

The County has been planning this expansion since 2005, but has not collaborated with the nearby residents in North Auburn and Lincoln. **We hope someone will hear our voices and keep this park as it was originally described to the property owner when he sold to Placer Land Trust: a place for docent-led hikes, and for families and school groups to enjoy the beautiful woodlands.**
Thank you.

RESPONSE TO COMMENT LETTER I81: CLAIRE CHRISTENSEN

Response to Comment I81-1

The commenter is concerned about the project cost and the environmental review process.

This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. The roadway safety issues are addressed below in the Response to Comment I81-2. No further response is required.

Response to Comment I81-2

The commenter expresses concerns about traffic and road safety.

The commenter has concerns with the County utilizing Auburn Valley Road.

Please see Master Response 3 – Traffic, Circulation, and Parking.

The commenter wants to know what the plans are for evacuation.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

The commenter requests information on the Highway 49 corridor between Bell and Lone Star Roads. Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0, “Transportation and Circulation,” for an analysis of impacts on transportation and circulation. Please see the Draft SEIR Chapter 18.0, “Other CEQA Sections.” The Draft SEIR identifies a cumulative traffic impact to the SR 49 intersections at Lone Star Road and at Cramer Road.

Please see Master Response 3 – Traffic, Circulation, and Parking.

Response to Comment I81-3

The commenter states that the County has not collaborated with the nearby residents on the planning of the Trails Expansion area or the proposed project.

In 2000, the voters of Placer County were presented with a ballot measure to express their desire for the Placer Legacy Open Space and Agricultural Conservation Program (Placer Legacy) through and responded in the affirmative. Placer Legacy established the framework and funding mechanisms for the open space acquisition and outdoor recreational amenities that were brought to fruition through the HFRP and Trails Expansion Project properties. For each of the 11 property acquisitions that make up HFRP and the Expansion Project properties to which the County was a party, beginning in 2003 the actions by the Board of Supervisors were noticed and discussed in public meetings, and the recreational components of each purchase and sale agreement were disclosed (See Appendix B of the Draft SEIR for the public trail descriptions associated with each property). As a development plan proceeded for each property, the County met or exceeded the public outreach guidelines for environmental review for each project including a previous Mitigated Negative Declaration and EIR. In the case of the current Project, the County provided multiple mailed notices to over 6,000 property owners in the vicinity of the Project 7 in 2017 and 2018. There were two Scoping Meetings (in 2017 and 2018) which were both heavily

attended by local residents, as evidenced by the Scoping Meeting attendance sheets and speaker sheets. The Project has been discussed in over 40 public meetings since late 2016 (including Scoping Meetings, Municipal Advisory Council meetings throughout western Placer County, Parks Commission, Planning Commission, Board of Supervisors, and other community groups upon request such as the Greater Auburn Area Fire Safe Council). Notices have been posted on the County web site, and multiple press releases and stories by local media outlets have been broadcast about the Project.

Additionally, the County Parks Division offered to meet with any local residents who wished to discuss the proposed project. Parks staff met on 3 separate occasions with local residents who were interested in meeting with members the Parks Division. In February of 2019, the County invited members of the Protect Rural Placer group to participate in a site visit to the Santa Clara Open Space Authority's Sierra Vista Open Space Preserve to learn how the East Bay area has successfully integrated public use of trails with on-going cattle operations. Additionally, the County met specifically with the Protect Rural Placer group and Supervisor Gore on May 28, 2019 to address the groups' questions and concerns. Lastly, the Notice of Availability for the Draft SEIR was again sent out to over 6,000 homeowners. Over 500 comments were received during the public comment period which included numerous comments from local residents and members of the Protect Rural Placer group.

2.7.82 LETTER I82

Letter I82

To: Community Development Resource Agency, Placer County Board of Supervisors, Planning Commission, Parks Department, and Placer Land Trust

From David T. Christensen
9955 Spyglass Circle
Auburn, CA 26202
Retired Partner, Ernst and Young

The Hidden Costs of Hidden Falls: Points to ponder, as suggested by a retired CPA:

- 182-1
- 1. I have reviewed the \$1+ billion Placer County operating budget for next year in an effort to determine what the Hidden Falls Park, and more importantly, expansion, will cost. It is virtually impossible to determine this based on the public budget documents.**
 - 2. It appears that the project was first launched in the 1990's but there is no clear starting point. Is there an end point?**
 - 3. Is there a comprehensive plan, available to the public, where acquisition and on-going maintenance costs are spelled out?**
 - 4. Apparently, the forecast of who will be using Hidden Falls shows that 66% will be from outside Placer County. Why are we paying tens of million for years of on-going maintenance for "Out of County" users? We have so many more urgent and relevant needs in our County, especially now with the impact of Covid 19.**
 - 5. Is it time to put a halt to what many believe is a special pet project or "Boondoggle"?**
 - 6. The fire danger will be immense and the current version of the EIR just blows them off with nominal investment in storage tanks and heli-pads. How realistic is that?**
 - 7. Do any of the County Staff, Planning Commissioners or Supervisors actually live in the Bell, Cramer, Lone Star or Curtola Road areas? Doubtful!**
 - 8. Isn't it critical that our Supervisors, as custodians of our tax dollars, have a clear understanding of all the relevant costs, past and future, before approving any more? Don't we deserve that as taxpayers? We request a straight-forward report reviewed by the county auditor.**

Please see specific issues related to the EIR on the following page.

I82-2

Specific Issues raised are;

1.2.1 Type of EIR regarding a change in project or circumstances that could occur third point..."Any new information of substantial importance"

Issue; In view of the Virus and related impact on all governmental entities, it is likely that the County budget will be massively impacted, in a negative way, for years to come. How does the County plan to rationalize continued spending on a discretionary project at this time. The economic environment seems to contradict any such unwise and fiscally irresponsible action.

Further, assuming the argument is in part that Grant monies will be used, how can you assume this when it is a whole new world financially speaking and any remaining grant monies could be better spent on essential services, e.g housing, homeless services, county health, police and fire.

1.3.2, Chapter 1.0."Summarizes the purpose, need..."

Issue; Whatever the need for a park or expansion was in prior years, it seems of a very low priority today, in terms of a use of limited resources. Why is the project still considered "Needed" in the current environment?

I82-3

Chapter 17.0, Alternatives,

Issue; Why is the alternative of doing nothing not considered or commented upon?

I82-4

Charter 18.0 Other CEQA-Required Sections....."describes significant irreversible commitments of resources, etc..."

Issue 1; Section 18.4.1 references several activities, including increased fire suppression costs etc., "... that will be offset by increased tax revenues". Please specify where these tax revenues are expected to come from, especially in view of the real world and the current and likely future Placer County situation.

Issue 2; Please specifically identify each of the intended fire protection and related components and costs, e.g. the two heli-pads, 12,000 gallon water tanks, land clearing, LRV and tanks, fire retardant and volumes stored, expected increase in fire related service calls and all other items and related costs considered in your assessment of the fire danger.

Issue 3; Please provide a detailed schedule of all the various processes and procedures you envision to mitigate the added fire risk. Also, please detail the expected FTE's and other allocated and direct costs of implementation and on-going monitoring.

RESPONSE TO COMMENT LETTER I82: DAVID T. CHRISTENSEN

Response to Comment I82-1

The commenter has concerns regarding the cost of the proposed project.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

The commenter expresses concerns regarding fire danger.

Please see Draft SEIR 16.4 “Impacts” in 16.0 “Wildfire” for a discussion of wildfire impacts analysis. Please also see Master Response 2 – Wildfire, Safety, and Emergency Response.

The commenter raises issues that are not CEQA-related (i.e. “Is it time to put a halt to what many believe is a special pet project? Inquiring whether or not any of the County people involved with the project live in the Project area?”).

These comments are not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor do they contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

Response to Comment I82-2

The commenter is concerned about funding and questions the need for the Project.

These comments are not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the proposed project, nor do they contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

Response to Comment I82-3

The commenter is concerned about the alternatives analysis.

Please see the Draft SEIR Section 17.4 “Alternatives Selected for Analysis” and a discussion of the “No Project Alternative (Alternative 1)”.

Response to Comment I82-4

The commenter is concerned about the cost and procedures to mitigate wildfire risks of the proposed project.

Please see Response to Comment I82-1 above for a response to the issues of cost and wildfire risks. Please also see Mitigation Measure S13-1 – County shall purchase one Light Rescue Vehicle for use by the Placer County Fire Department/CAL FIRE. Additionally, please see discussion in Sections 13.2.4, 13.2.5, and the discussion of

Project benefits described on pages 16-16 and 16-17. Lastly, please see Mitigation Measures S16-a and S16-b for wildfire risk mitigations.

2.7.83 LETTER I83

Letter I83

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 7:40 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Valerie Christian
Email Address (Optional)	vchristian7@yahoo.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
Comments	I support the Hidden Falls Trail Expansion Project. The expansion will allow the community to enjoy the natural beauty of the area by foot, bike, or horse. We need a local place to escape to explore and increase our health and well-being mentally and physically.
Attach a document	<i>Field not completed.</i>

I83-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I83: VALERIE CHRISTIAN

Response to Comment I83-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 10:19 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Sarah christy
Email Address (Optional)	Sarahpchri01@outlook.com
Agenda Item (Optional)	Hidden Falls Expansion
Comments	<p>Please expand Hidden Falls regional park. North Auburn absolutely needs somewhere to go other than regional Park. We Have no direct Outlets safe for so many activities.</p> <p>It is a 30 minute drive To any location for mountain bikers, trail Runners Or equestrians to get to a sporting venue We need something close and local to support this vibrant outdoor community - the endurance capital. Please help all of Auburn with the expansion of Hidden Falls Park!</p>
Attach a document	Field not completed.

I84-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I84: SARAH CHRISTY

Response to Comment I84-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.85 LETTER I85

Letter I85

Shirlee Herrington

From: noreply@civicplus.com
Sent: Monday, May 11, 2020 11:34 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Chris W
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	<i>Field not completed.</i>
I85-1 Comments	Please expand Hidden Falls trail system.
Attach a document	<i>Field not completed.</i>

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I85: CHRIS W

Response to Comment I85-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.86 LETTER I86

Letter I86

Shirlee Herrington

From: Linda Cline <lindac6413@gmail.com>
Sent: Tuesday, April 21, 2020 10:01 AM
To: Cindy Gustafson
Cc: Jim Holmes; Robert Weygandt
Subject: HFRP Expansion

Follow Up Flag: Follow up
Flag Status: Flagged

Dear County Supervisors,

We appreciate all that your are currently doing to provide critical and essential services during this COVID-19 pandemic. Hope that you and your families are staying safe and healthy during these difficult days. We are requesting that you please postpone / re-schedule the meeting set for May 14 for the Public Hearing for the HFRP Expansion Project. As you know, we are all trying our best to shelter at home to protect our families, community, and front line workers. Therefore any large public meetings are still not possible.

I86-1

Clearly, the HFRP Expansion is not an essential business item in the middle of this pandemic. As you know, there are MANY residents who wish to be heard, esp. now with the SDEIR finally being released. In addition there are many in our rural area without reliable internet service. Therefore this does not seem to be the time to compromise the County's policy to make sure that the public has full access with public hearings and the ability to be involved in decisions that directly affect our lives.

We are counting on each of you to do make the right decision to postpone/ reschedule the Public Hearing for the HFRP Expansion Project, until it is safe to do so.

Thank-you,
Linda and Mike Cline

RESPONSE TO COMMENT LETTER I86: LINDA CLINE

Response to Comment I86-1

The commenter requests postponement of the May 14, 2020 Planning Commission meeting to accept public comments.

Please see Master Response 1 – Public Comment Process.

2.7.87 LETTER I87

RECEIVED Letter I87
MAY 20 2020
CDRA

Date: May 12, 2020

Attn: Placer County Board of Supervisors, Community Development Resource Agency,
Planning Commission and Park Division

From: Linda Cline
10800 Pickle Barrel Rd.
Auburn, Ca. 95602

Re: Hidden Falls Regional Park Trails Expansion SDEIR

As a long-time resident (43+ years), I am writing in response to the SDEIR. This draft has more clearly emphasized major concerns that I have had from the beginning about the Hidden Falls Expansion Plan, namely Wildfire Protection, Traffic and Environmental Impact. I do appreciate that the public wants more access to the Hidden Falls Park. However there are way too many risk factors to have this go safely forward. Just like during our current COVID19 crises, there are times when we have to ALL modify our wants and desires to meet the obvious safety needs for all of us.

From the day I found out about this Hidden Falls Expansion - way past the 2005 date when the County began planning - **Wildfire Safety** has been a top priority!

Right within our own neighborhoods, we have had 3 catastrophic fires within the last 8 years

- 1) Aug. 2009 - 49er fire consumed 340 acres, 60 homes, and 3 businesses
- 2) Sept. 2008 - Gladding fire burned 960 acres, 4 homes, and many more structures
- 3). 1992 - Fawn Hill fire that burned 250 acres and 11 homes

I87-1 Not to mention the devastating Camino Fire in Nov. 2018 - which was the deadliest and most destructive wildfire in California's history, with 18,804 buildings & homes destroyed and 86 deaths.

As we have clearly seen in the last few years the impact of human activity and climate change only means that California fire season will only get worse! Governor Newsom just announced this week that we have had a 60% increase in wildfires these first 4 months of 2020, than last year at this time!

Section 16.0 / SDIER - Wildfire

16.2. Environmental Setting

> CAL FIRE has clearly stated that up to 95% of wildfires are caused by human activity. Yet, no discussion of this in the SDEIR

> SDEIR makes no correlation between the number of projected visitors and potential for fires started by humans

16.3 & 16.4. Wildfire Classification and Fire Hazard Severity Zones

> SDEIR contains no discussion regarding what constitutes red flag conditions, nor does it address closing the park to visitors during such conditions

16.3 & 16.4 (cont.)

> SDEIR has very little information regarding the fire spread based on fuels, topography, or weather. Rate of spread is critical as it relates to evacuation and safety of community - I.e.

Camp Fire

> SDEIR has no discussion or correlation between fire hazard severity levels in the Expansion area, as relates to what PG&E and fire insurance companies deem as High Risk Areas. PG&E addressed this increased risk with planned power outages during red flag conditions and insurance companies have continued more and more policy cancellations!

16.4.2. Emergency Response / Emergency Evacuation

> There are ~ 6,000 residence living near the HFRP and Expansion area that could be affected by any fire in this area. During the 49er Fire in 8-09, Bell Road was impassable.

> Effective / Safe Evacuation and Emergency Vehicle response via Bell, Cramer, and Lone Star Road would be GREATLY IMPACTED as area residents, park visitor vehicles, and horse trailers, area wineries, and Auburn Valley golf course all attempt to exit on these narrow rural roads! SDEIR also has no data on the number of driveways and side roads along Bell, Cramer, and Lone Star and the number of vehicles that would be merging to evacuate all at once.

> 2018 Camp Fire in Paradise speaks volumes to the pure panic, chaos, and loss of lives when there is NOT enough safe escape routes! Let's not have a devastating history repeat itself!!

16.6. Mitigation Measures

> How will visitors be policed for illegal camping, campfires, BBQs, smoking, dogs off leash, and livestock issues when California Land Management "Rangers" are the only enforcement??

> SDEIR appears to speculate future wildfire incidence will correlate with past 55 years of fire history in the area. However, no correlation is possible because this proposed Trail Expansion area was privately owned land - free of visitor impact during most of these years!

Other Significant Issues that SDEIR does not address

> Over 900 miles of trails already exist in Placer County and Maintenance Funding for these existing trails is already problematic

> Expansion of HFRP creates liability for Placer County by adding hundreds, if not thousands, of park users into a fire-prone area. One that is already impacted by PG&E outages and fire insurance cancellations based on fire risk factors!

With the deadly combination of the climate crises we are currently in with decreased rainfall, dying trees, and increased fuel load and the woeful lack of our small and winding country road's capacity for safe evacuation, there seems to be a blatant omission from this SDEIR!!

Right alongside these obvious Wildfire Concerns is the **Traffic Impact** on the narrow rural roads needed to access the proposed HFRP Expansion. All of these narrow access roads have blind curves, hills, and many spots of limited visibility.

1) Cramer Road - SDIER does not point to the fact that collisions on this road are already above the state average. There is also no center line and it does not meet minimum safety standards.

2) Lone Star Rd - is a winding road with an already high traffic volume due to residents and Auburn Valley Country Club members and visitors

I87-4

I87-1
Cont'd

I87-2

I87-3

3). Bell Rd. - has a high volume of traffic, many sections and curves with poor visibility, excessive speed of vehicles and will be heavily impacted by the approval of residential, government, and commercial projects already started. For the safety of residences and visitors a left-turn lane into the Twilight Ride entrance is absolutely necessary with Phase 1 of that parking lot.

4) Mears Rd. - excessive traffic and speeding already present with no CHP presence

5) Highway 49

> SDEIR fails reporting of collisions and fatalities on SR 49 from Lone Star to Bell Rd over past 10 years. There have been 4 fatalities in just the past 6 months

> SDEIR and County have pointed to safety improvements, i.e. proposed roundabouts & center dividers, to this section by CALTRANS - but this will be years out due to required extensive studies, analysis, public input, funding, and construction.

SDEIR is grossly negligent in addressing the INCREASED VOLUME of TRAFFIC

> it does state that the Twilight Ride parking lot on Bell Rd. would add 600 vehicles on a single Sat. or Sunday and the Harvego parking lot through Auburn Valley Country Club generates 573. That means an additional 1,173 vehicles on a single weekend day which would have devastating impacts on Bell, Cramer, and Lone Star roads!

> this fails to identify all the other traffic that already exists on these roads with the local wineries, AVCC golf course, event center and restaurant, Agri-tourism events and No. Auburn Art Studio tours

> it fails to acknowledge these major traffic safety issues being compounded by truck and trailer rigs and cyclists - with none of these roads having adequate shoulder or bike lanes. In many sections, passing would require going over the center of the road and into the path of oncoming traffic!

This SDEIR does not quantify the number of residents plus visitors trying to navigate and egress these narrow & winding rural roads. Therefore it does NOT responsibly address the Traffic Impact on driver safety and/or safe Evacuation in case of a fire!

Environmental Impact of Hidden Falls Trail Expansion Project

> the proposed Twilight Ride parking lot is 70% larger (with 700 people + 600 vehicles on a single weekend day) than the current Hidden Falls lot. Yet this is the access to Taylor Preserve that is only 300 acres - 1/4 size of the current Hidden Falls.

> SDEIR states that the Hidden Falls Expansion project will **exceed** thresholds for acceptable Vehicle Miles Traveled. VMT is the most significant measure of transportation impacts, emissions & air quality impacts. Placer County already has poor to unhealthy air quality days in the summer, when the impact from Hidden Falls traffic would be the greatest.

> This proposed project would result in the removal of trees from oak woodland habitat. Our oak trees are already dying at an alarming rate in the foothills, due to droughts and beetle infestations. Do we really want the live, healthy trees to be cut down?!!

> SDEIR fails to include the degradation of aquatic habitat and wetlands at the entrance of the Twilight Ride property

Do we always need MORE at the expense of our already fragile balance of preserving riparian and aquatic habitat, oak woodlands and wildlife?!! Or could we have a more equitable and healthy alternative to the proposed Hidden Falls Expansion by continuing docent led hikes, cycling, educational outdoor experiences and guided group activities for public access!

187-3
Cont'd

187-4

I87-4
Cont'd

↑ With these obvious **Wildfire, Traffic** and **Environmental concerns**, I would hope there would be more careful analysis and attention paid to the inherent devastating impact that the Hidden Falls Trail Expansion will have on the roads, environment, habitats, and fire dangers in our community.

Respectfully submitted,

Hinda J. Cline

RESPONSE TO COMMENT LETTER I87: LINDA CLINE

Response to Comment I87-1

The commenter states concerns about wildfire and evacuation.

Please see the Draft SEIR Section 16.4 “Impacts” in Chapter 16.0 “Wildfire” for an analysis of wildfire impacts.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I87-2

The commenter expresses concerns regarding funding, wildfire and evacuation.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

With regards to the wildfire and evacuation concerns, please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I87-3

The commenter states various concerns about traffic, including the impacts on private driveways.

As stated in the Draft SEIR, the project would result in an increase in VMT. Since no threshold has been established by the County and the proposed project is inconsistent with the MTP/SCS, the increase in VMT is considered significant. The effects on private driveways are not considered in the Draft SEIR because private driveways are the responsibility of the individual landowner.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

Additionally, the commenter states that at full build-out of the Twilight Ride parking area only 300 acres would be available to the public. After Phase 1 of the Twilight Ride trailhead and parking area are constructed, existing trails within both the Taylor Ranch (321 acres) and the Kotomyan Preserve (160 acres) would be available to the public. By the time full-build out of the Twilight Ride parking area is complete, connectivity to the entire Trails Expansion area would be complete.

The commenter states that the Project would result in the removal of trees from oak woodland habitat. Removal of mature oak trees is expected to occur mainly along the access roads for widening. Parking areas and trails would be specifically sited to minimize oak tree removal and a portion of the Twilight Ride property that is contiguous with the oak woodland found on the Taylor Ranch property, will be preserved in perpetuity.

The commenter states that construction of the Twilight Ride entrance would degrade the aquatic habitat and wetlands near Bell Road. Grading and Improvement Plans will require Best Management Practices to prevent degradation to the entrance pond and wetlands.

Additionally, please see the Draft SEIR Section 12.4 “Impacts” in Chapter 12.0 “Biological Resources” for an analysis of impacts on biological resources. Please also see Section 12.5 “Mitigation Measures”, which include the following measures to avoid, minimize and mitigation impacts on biological resources:

Mitigation Measure S12-1: Implement Measures to Protect Aquatic Habitats and the Native Fish Community

Mitigation Measure S12-2: Replace, Restore, or Enhance Affected Jurisdictional Waters of the United States and Waters of the State

Mitigation Measure S12-3: Implement Measures to Protect California Red-Legged Frog

Mitigation Measure S12-4: Implement Measures to Protect Foothill Yellow-Legged Frog and Northwestern Pond Turtle

Mitigation Measure S12-7: Protect Oak Woodland Habitat

Mitigation Measure S5-1: Obtain Authorization for Construction and Operation Activities with the Central Valley Regional Water Quality Control Board and Implement Erosion and Sediment Control Measures as Required (see in Chapter 5.0, “Soils, Geology, and Seismicity”)

Mitigation Measure 11-1: Prepare and Implement a Grading and Drainage Plan (see in Chapter 11.0, “Hydrology and Water Quality”)

Response to Comment I87-4

The commenter promotes the continuation of docent-led hikes only (Alternative 1 – No Project).

2.7.88 LETTER I88

Letter I88

Shirlee Herrington

From: Josh Cooper <joshuascooper@gmail.com>
Sent: Sunday, February 23, 2020 9:26 AM
To: Placer County Environmental Coordination Services
Subject: Hidden Falls Trails Expansion Project

I88-1 | I am writing to express my support for this worthwhile initiative. We have the wonderful opportunity to create an oasis for outdoor activity that will be increasingly prized over the generations as open space continues to decline. While this may have short term environmental impact, the long term effect will be positive as this large swath of land will be more resistant to encroachment over time. This trail system along with the American river trail system will further enshrine Auburn as an outdoors destination.

RESPONSE TO COMMENT LETTER I88: JOSH COOPER

Response to Comment I88-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.89 LETTER I89

Letter I89

Shirlee Herrington

From: coop <jim47565@gmail.com>
Sent: Monday, May 18, 2020 6:33 AM
To: Placer County Environmental Coordination Services
Subject: [EXTERNAL] Comments draft SEIR

My wife and I have lived on Mears drive since before the park was created so have observed the exponential increase in use. We are fortunate enough to live beyond the Mears Place park turn off so are mostly spared the direct impacts. A review of the SEIR generates a couple of observations:

I89-1

- 1) Since pretty much everyone agrees the Mears road access is at capacity and the surrounding neighborhood has been adversely impacted why try to slide in approval for 25 more parking spaces??
- 2) SEIR states results of a survey that about 2/3 rds of park users are from out of the county. Seems obvious that Hidden Falls is already functioning as a regional park. I don't recall that was ever the intent when it was created and the addition of the new access points will certainly increase its regional park status. Is that what we really want? Why not limit usage of the park to Placer county residents? Poof –Park overuse is eliminated and Garden Bar and Cramer rd access points are no longer needed and only us Mears dr. area people continue to be impacted.
- 3) A final thought--I would not be caught dead on a horse but several neighbors take great pleasure in burnishing their equestrian skills by riding in the park so it does provide some significant benefits to those few with those skills.

Jim & Oli Cooper
7345 Mears drive

RESPONSE TO COMMENT LETTER I89: JIM AND OLI COOPER

Response to Comment I89-1

The commenter expresses concerns regarding parking and traffic.

Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0 “Transportation and Circulation” for a discussion of transportation and circulation impacts analysis.

Please see Master Response 3 – Traffic, Circulation, and Parking.

The commenter states that results of a survey are that about 2/3 of the park users are from out of the County. Please refer to Table 8-7, which shows that based upon information received from the parking reservation system about 63% of the visitors on the *weekends* were from outside the County. Informal survey data from visitors on the weekdays shows that the majority of visitors are from within the County.

The commenter suggests limiting entrance to Placer County residents only. This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

Lastly, the commenter acknowledges that HFRP does provide significant benefits to equestrians. This comment is not directed at the adequacy of the Draft SEIR for addressing adverse physical impacts associated with the project, nor does it contain an argument raising significant environmental issues. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration. No further response is required.

2.7.90 LETTER I90

Letter I90

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 8:04 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

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First and Last Name	Marnie coots
Email Address (Optional)	Marniecoots@icloud.com
Agenda Item (Optional)	Hidden falls expansion project
Comments	I support the hidden falls expansion project because it's good for the health of my son and I to go hiking or running. I live right next to where expansion is planned and it would be a tremendous asset to our community and I would love to see these lands preserved for generations to come.
Attach a document	<i>Field not completed.</i>

I90-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I90: MARNIE COOTS

Response to Comment I90-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:38 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Kristy Stokes Corah
Email Address (Optional)	kristy.corah@gmail.com
Agenda Item (Optional)	Hidden Falls Expansion project
Comments	I am hugely in favor of the expansion. We the people need places to recreate. I am a nutritional therapy practitioner and the health of America is dismal. We are the sickest, fattest country in the world. This is due mostly to poor diet (processed food) buy also a lack of exercise. Exercise in nature far exceeds that of a gym; it is both body and brain cathartic. HF is crowded and people are turned away. Expansion should be allowed.
Attach a document	<i>Field not completed.</i>

I91-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I91: KRISTY CORAH

Response to Comment I91-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.92 LETTER I92

Letter I92

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:32 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	B Corc
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	Hidden Falls Trail expansion
Comments	the expansion of the park and trail system at Hidden Falls sounds like nothing but a beneficial idea for the local community and visitors alike. A robust trail system adds tremendously to quality of life and having more trails also means more visitors spending money in the local area. 30 additional miles of single track is a considerable expansion and I think it would do alot of good.
Attach a document	<i>Field not completed.</i>

I92-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I92: B. CORC

Response to Comment I92-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Shirlee Herrington

From: noreply@civicplus.com
Sent: Saturday, May 16, 2020 6:26 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	John T Cornelius
Email Address (Optional)	thorcornelius@gmail.com
Agenda Item (Optional)	Hidden Falls Trail Expansion Project
I93-1	Comments
	I support the Hidden Falls Trail Expansion Project. I have 2 boys who love the outdoors and mountain biking. It's a family friendly activity with no screen time and leaning to be in nature, families need this!
	More parking, more trailheads, spread out crowds, promote healthy activities and benefit everyone!
	John Cornelius, MD
	Colfax, Ca
Attach a document	Field not completed.

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I93: JOHN CORNELIUS

Response to Comment I93-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.94 LETTER I94

Letter I94

Shirlee Herrington

Subject: FW: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

From: noreply@civicplus.com <noreply@civicplus.com>

Sent: Saturday, May 9, 2020 11:36 AM

To: Andrea Dashiell <ADashiell@placer.ca.gov>; Kara Conklin <KConklin@placer.ca.gov>; George Rosasco <GRosasco@placer.ca.gov>

Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Patrick Coryell

Email Address (Optional) patrick@kmcreative.com

Agenda Item (Optional) Support for the Hidden Falls Expansion Project

I94-1

Comments I strongly support the Hidden Falls Expansion Project. We need more trails and accessible open space for our community's health, to reduce crowding at parks and to help support a tourism economy. I use many different parks and trails in Placer County and currently, it is hard to gain access to parking and the trails as they are so popular. I hike with my family, trail run and mountain bike. We need more trails.

Thank you,

Patrick Coryell
Rocklin

Attach a document *Field not completed.*

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I94: PATRICK CORYELL

Response to Comment I94-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.95 LETTER I95

Letter I95

Shirlee Herrington

From: noreply@civicplus.com
Sent: Tuesday, May 12, 2020 8:29 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Haven Courtney
Email Address (Optional)	<i>Field not completed.</i>
Agenda Item (Optional)	I support Hidden Falls trail expansion project
Comments	Hidden Falls is an amazing resource for the Auburn community! Expanding the parking and trails will only make it better. I ride mountain bikes and hike there. It's fantastic how the biking, hiking and equestrian community all get along well at Hidden Falls. Please approve the expansion project!
Attach a document	<i>Field not completed.</i>

I95-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I95: HAVEN COURTNEY

Response to Comment I95-1

The commenter expresses support for the project.

The support is noted. No further response is required.

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 9:12 AM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Lans Courtney
Email Address (Optional)	Bajaf16@hotmail.com
Agenda Item (Optional)	Hidden Falls Trails Expansion
Comments	I support the expansion of trails and new trailheads at Hidden Falls Regional Park. Withe the amount of growth in Placer County, the need for more park access is vitally important. The COVID pandemic has just exacerbated the need as more and more people are social distancing in parks. With more trails and additional trailhead access points, the park would be accessible by more people and there would be a dispersal of people to access more of the park. Hidden Falls is literally a hidden gem. Please approve measures to increase access to this beautiful park.
Attach a document	<i>Field not completed.</i>

I96-1

Email not displaying correctly? [View it in your browser.](#)

RESPONSE TO COMMENT LETTER I96: LANS COURTNEY

Response to Comment I96-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.97 LETTER I97

Letter I97

Saturday, May 16, 2020

To: Community Development Resource Agency, Placer County Board Of Supervisors, Planning Commission, And Parks Division

From: Rick Couvrette. 10025 Hubbard Rd, Mailing Address 4722 Bell Rd, Auburn CA 95602
CELL # 530-906-4399

Emergency Service Responses to HFRP

I97-1

1. Based on emergency services provided to the existing HFRP, an expansion of the current area would DEFINITELY increase needs for emergency service responses.
2. Currently there are up to 30 calls per month to the existing park. This is Fire/rescue only.
3. How often do Placer County Sheriff's officers and CHP officers respond to the current park?
4. The sometimes-mentioned idea that if a PCSO response to HFRP is not documented, there must not have been an incident. This is a purposeful miss representation of what really happens.
5. It is any agency's job to efficiently mitigate any call for service. In many situations, being efficient means not writing extensive reports for an event that was cleared up verbally.
6. These interactions and emergency responses take time away from other duties and/or availability at the time the Deputy or Fire/EMS are mitigating a complaint /emergency.
7. There is a significant use of emergency resources to this park now, THIS IS A FACT, so why would this not proportionately increase with added ports of entry and more people and animals in the expanded park area?
8. This park expansion is a potential significant drain on local emergency response agencies!

Fiscal Impacts

I97-2

1. What is the source of funds to pay for these increased service calls?
2. It is a FACT that Placer County in the not so distant past has suggested a reduction of personnel at Station 180 would be necessary because of budget issues.
3. What has changed so much that Placer County now feels it can afford to staff yet another Fire Apparatus unit, a Light Rescue Vehicle (LRV), for the purpose of responding to the park?
4. It must be remembered you cannot budget for extra services based on a high point in the economy since these services are still required when the economy is poor. In other words is the budgeting for extra services permanent?

I97-2
Cont'd

5. Is this LRV unit staffed year round? Remember fire is rarely why resources are dispatched to the Park and responses are year round.
6. Don't forget fire is probably one of the most devastating potentials within the park.
7. Is the proposed added LRV unit to be staffed when personnel are on other calls?
8. The proposal of another small unit is a VERY significant cost if it is staffed. Or, is this just another vehicle in the barn for current personnel to respond in IF there is a specific need.
9. The point here is an extra vehicle is of no use if it is not staffed.
10. It is my understanding the response area that the park is in is already very busy.
11. How is adding to the call volume not a significant impact on local services?

Local Fire History

I97-3

1. Because the Consultant deems fire history in the proposed park footprint insignificant does not mean fire history is not significant in the general area!
2. Fire history is much underrepresented in the study. There have been significant fires with significant losses very near the park; these fires just weren't in the park footprint.
3. Examples would be the - Gladding Fire, The 49 Fire and the Fawn Hill Fire, just to mention the very local examples.
4. There are significant fires like this every summer throughout Northern California.
5. The common denominator in most of these fires is the weather and fuel conditions.
6. These weather and fuel conditions exist within the proposed park and surrounding properties pretty much every summer, and sometimes for days or weeks at a time. These conditions are considered extreme.
7. THIS IS NOT UNAVAILABLE INFORMATION. CAL FIRE recommends that up to 95% of all fires are caused by humans or human technology.
8. By having human occupancy increased dramatically in this area, the potential for fire starts increases dramatically.
9. Therefore, fuel + weather + topography + significant fire history in the area + significant increase in population/ignition possibilities = a significant increase of catastrophic fire potential. This is a seriously understated portion of the study.
10. What about the FACT that a significant portion of all the residents in the area have had insurance cancelations. How can the SDEIR and even worse Placer County itself ignore the FACT the insurance industry is not comfortable with fire risk in the study area!

Emergency Evacuation

I97-4

1. Emergency evacuation is much underrepresented in the study.
2. Bell Road and its connectors do not have passable shoulders.
3. The potential to overload the vehicle capacity for Bell Rd, Cramer Rd and Lone Star Rd has been demonstrated numerous times in the past, with the most recent being during the 49 Fire.
4. During the 49 FIRE Bell Road was impassable. Not only was evacuation not possible, emergency services would have not been able to respond to anywhere near the Twilight Ride entrance or the Auburn Valley entrance, or any other point off of Bell RD.
5. It should also be noted that with 40 vehicles pulling trailers and 100 other vehicles all exiting at one time, this alone would most likely prevent effective evacuation or response in to an incident in the CRAMER ROAD- LONE STAR ROAD AND BELL RD areas. None of this is mentioned in the SDEIR.
6. The SDEIR also doesn't mention the significant population these roads serve, nor does it mention Auburn Valley and the wineries that have times of higher occupancy.
7. This is a very significant issue because evacuation for wildfires is immediate and not debatable.
8. This is the nightmare of actual wild land interface issues that already exist in this area without a park expansion.
9. The issue of evacuation of fire-prone areas is increasingly becoming a proven and often unavoidable problem throughout Northern California with no immediate cure in sight.
10. It would be irresponsible of Placer County to add to an already dangerous and proven problem.

Grants and Funding

I97-5

1. It has been suggested that application for grants and other funding is in progress to mitigate park brush clearing and infrastructure building within the park, and possibly for improving roads.
2. These funding mechanisms, however, are NOT guaranteed in the study. If the park is approved and funding does not materialize, what measures or guidelines would be guaranteed to prevent the expansion from happening in an irresponsible manner?
3. Are we guaranteed the park will be kept in safe condition, and is this budgeted?
4. The park would not go away in slow economic times. Proposed clearing and mitigations, however, need to be maintained. Grants do not provide long term funding!

I97-6 | As a lifetime Placer County resident I am shocked at the misleading tactics that are being used to advance this Park project.

| This whole process has been an embarrassing display of manipulation or omission of facts concerning Environmental and local Citizen Impacts this park will produce.

| The use of a Private company to produce a grossly inadequate SDEIR document is flat out irresponsible.

I97-7 | My wife Miki and I do not support this park as proposed because it is a significant liability Placer County is not prepared to handle.

| We would however be much more receptive of a proposal that included fully supervised tours of the preserved lands. This would not only be safer for everybody involved it could be very educational and maybe we could even encourage a new generation of farmers and ranchers.

| As ranchers in this area we feel pressured to not continue this tradition based on the lack of support from Placer County. We hope this attitude can change so future generations can feel welcome to continue this Placer County tradition. There can be room for agriculture and growth if Placer County chooses.

Rick and Miki Couvrette

The Couvrette Ranch

Protect Rural Placer County!

RESPONSE TO COMMENT LETTER I97: RICK AND MIKI COUVRETTE

Response to Comment I97-1

The commenter expresses concerns about public safety and states that the proposed project is a potential significant drain on local emergency response agencies.

Please see Draft SEIR Chapter 13.0, “Public Services and Utilities,” for a discussion of “Emergency Response” (13.2.5) and “Police Protection” (13.2.6), and Section 13.4 “Impacts” for an analysis of impacts on public services. Additionally, please see Master Response 4 – Land Use Compatibility.

Response to Comment I97-2

The commenter has concerns regarding the fiscal impacts of the proposed project.

The purpose of the Draft SEIR is to identify the significant effects of the proposed project on the physical environment and the Draft SEIR is not intended to address social or economic impacts. This is consistent with CEQA guidelines stating that “An economic or social change by itself shall not be considered a significant effect on the environment” (CEQA Guidelines Sections 15131 and 15382). No further response is required.

Response to Comment I97-3

The commenter expresses concerns about wildfire history of the local area and concerns regarding property insurance.

Please see the Draft SEIR Section 16.4 “Impacts” in Chapter 16.0, “Wildfire,” for an analysis of wildfire impacts.

Please also see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I97-4

This comment includes concerns regarding emergency evacuation.

Please see Master Response 2 – Wildfire, Safety, and Emergency Response.

Response to Comment I97-5

The commenter has concerns over funding of the proposed project.

Please see Response to Comment I97-2 above.

Response to Comment I97-6

The commenter expresses concerns about the adequacy of the analysis.

That the Draft SEIR has been prepared pursuant to the requirements of CEQA, the potential impacts have been thoroughly analyzed, and appropriate mitigation measures have been proposed. No further response is required.

The commenter infers that the process has not been transparent.

In 2000, the voters of Placer County were presented with a ballot measure to express their desire for the Placer Legacy Open Space and Agricultural Conservation Program (Placer Legacy)) through and responded in the affirmative. Placer Legacy established the framework and funding mechanisms for the open space acquisition and outdoor recreational amenities that were brought to fruition through the HFRP and Trails Expansion Project properties. For each of the 11 property acquisitions that make up HFRP and the Trails Expansion Project properties to which the County was a party, beginning in 2003 the actions by the Board of Supervisors were noticed and discussed in public meetings, and the recreational components of each purchase and sale agreement were disclosed (See Appendix B of the Draft SEIR for the public trail descriptions associated with each property). As a development plan proceeded for each property, the County met or exceeded the public outreach guidelines for environmental review for each project including a previous Mitigated Negative Declaration and EIR. In the case of the current Project, the County provided multiple mailed notices to over 6,000 property owners in the vicinity of the Project 7 in 2017 and 2018. There were two Scoping Meetings (in 2017 and 2018) which were both heavily attended by local residents, as evidenced by the Scoping Meeting attendance sheets and speaker sheets. The Project has been discussed in over 40 public meetings since late 2016 (including Scoping Meetings, Municipal Advisory Council meetings throughout western Placer County, Parks Commission, Planning Commission, Board of Supervisors, and other community groups upon request such as the Greater Auburn Area Fire Safe Council). Notices have been posted on the County web site, and multiple press releases and stories by local media outlets have been broadcast about the Project.

Additionally, the County Parks Division offered to meet with any local residents who wished to discuss the proposed project. Parks staff met on 3 separate occasions with local residents who were interested in meeting with members the Parks Division. In February of 2019, the County invited members of the Protect Rural Placer group to participate in a site visit to the Santa Clara Open Space Authority's Sierra Vista Open Space Preserve to learn how the East Bay area has successfully integrated public use of trails with on-going cattle operations. Additionally, the County met specifically with the Protect Rural Placer group and Supervisor Gore on May 28, 2019 to address the groups' questions and concerns. Lastly, the Notice of Availability for the Draft SEIR was again sent out to over 6,000 homeowners. Over 500 comments were received during the public comment period which included numerous comments from local residents and members of the Protect Rural Placer group.

Response to Comment I97-7

The commenters express their opposition to the proposed project and express support for Alternative 1 (No Project).

Comment noted. No further response is required.

2.7.98 LETTER I98

Letter I98

Shirlee Herrington

From: noreply@civicplus.com
Sent: Wednesday, May 13, 2020 8:29 PM
To: Shirlee Herrington; Kara Conklin; Sue Colbert; Meghan Schwartz; Lisa Carnahan
Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name	Brittany Covich
Email Address (Optional)	Britt_lane@hotmail.com
Agenda Item (Optional)	Hidden Falls expansion
I98-1 Comments	I support the expansion of Hidden Falls and appreciate how hard Placer County and Placer Land Trust have worked to make this possible. Thank you for providing these kinds of recreational amenities for my family!
Attach a document	<i>Field not completed.</i>

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RESPONSE TO COMMENT LETTER I98: BRITTANY COVICH

Response to Comment I98-1

The commenter expresses support for the project.

The support is noted. No further response is required.

2.7.99 LETTER I99

Letter I99

Shirlee Herrington

Subject: FW: Hidden Falls

From: Rob Creger <rcreger.1@verizon.net>

Sent: Friday, March 20, 2020 6:54 AM

To: Andy Fisher <AFisher@placer.ca.gov>

Subject: Hidden Falls

Mr. Fisher,

I99-1 [I am a long time resident of Placer County. As my neighborhood struggles with traffic, bicycles and the lack of traffic enforcement I am curious as to what steps are going to be taken with the Hidden Falls expansion to address the concerns of the residents in the area where speeding and illegal passing are rampant.

Thank you,

Robin Creger
5400 Wise Road

RESPONSE TO COMMENT LETTER I99: ROB CREGER

Response to Comment I99-1

The commenter expresses concerns about traffic, specifically with regards to speeding and illegal passing.

Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0, “Transportation and Circulation,” for an analysis of impacts on transportation and circulation.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

2.7.100 LETTER I100

Letter I100

Shirlee Herrington

Subject: FW: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

From: noreply@civicplus.com <noreply@civicplus.com>

Sent: Monday, May 11, 2020 7:38 AM

To: Andrea Dashiell <ADashiell@placer.ca.gov>; Kara Conklin <KConklin@placer.ca.gov>; George Rosasco <GRosasco@placer.ca.gov>

Subject: [EXTERNAL] Online Form Submittal: Public Comment Submission - Planning Commission

Public Comment Submission - Planning Commission

During the Covid-19 Pandemic, Placer County is committed to public participation in County Government in a manner that is consistent with guidance provided by our Public Health Official. We have provided this form that can be used to submit comments to the Planning Commission.

First and Last Name Robin Creger

Email Address (Optional) rcreger.1@verizon.net

Agenda Item (Optional) Hidden Falls Park Expansion

Comments

While the advocacy for recreational areas is understandable this particular expansion is another harsh impact on the residents of a rural community. Traffic is already an issue on our roads. I can understand the assessment that the local roads are not built to handle the traffic loads and that it is simply economically unfeasible to upgrade them to standard. Think about what has happened to the people living here and paying taxes, Wise Road from Highway 65 to Auburn (Mount Vernon) has become a commuter route with speeds in excess of 60 MPH and people crossing the double yellow lines both to corner and to pass slower traffic. Then there are the wineries which attract more traffic, often not sober. Also there are bicyclists, often in large groups not obeying laws or courtesies on the road. Now you want to add another attraction; so ask yourselves, what is the benefit to the existing community you are supposed to represent? What we do not have and what we cannot get is law enforcement on our roads. A call to the sheriff gets you direction the CHP, somehow responsible to patrol rural county roads. A call to the CHP gets you sympathy but no help as this is a very low priority to their area of responsibility. The counties response has been to raise the speed limit on stretches of the road which has bad sight lines from the existing driveways and to post radar enforcement warnings which everyone knows can be safely ignored. So we hear

I100-1

I100-1
Cont'd

plans and glowing promises of access to recreation, what we don't here is a response to an already dangerous situation that you intend to make worse. I invite you to take a walk out here in the country with me, or if that is too frightening, drive a horse trailer at the speed limit and get passed on a blind curve by someone who is in a hurry to get through the country. Your plans need to consider the impact on existing residents and what you intend to do for them and not give so much consideration to people who live outside the impact area. Let us hear what you intend to do to mitigate an already dangerous traffic situation, and the added fire danger

Attach a document

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RESPONSE TO COMMENT LETTER I100: ROBIN CREGER

Response to Comment I100-1

The commenter expresses concerns about traffic and road safety, especially with regard to speeding and crossing the double yellow lines. The commenter wants to know what is going to be done to increase law enforcement in the area to counter these issues.

Please see the Draft SEIR Section 8.4 “Impacts” in Chapter 8.0, “Transportation and Circulation,” for an analysis of impacts on transportation and circulation.

Please also see Master Response 3 – Traffic, Circulation, and Parking.

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