

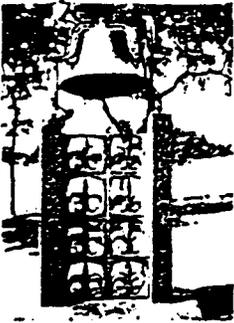
B-14 Center Unified School District (11/12/93)

B-14-1. Analysis provided by Placer County Office of Ed does not cover all of Center Unified; additional analysis is attached

The Final EIR's schools analysis addresses the concerns expressed in this comment.

B-14-2. Recommended analysis of Center Unified impacts for inclusion in Final EIR

The Final EIR's schools analysis addresses the concerns expressed in this comment.



Center Unified School District

6408 Watt Avenue • Elverta, California 95626
Telephone (916) 338-6400 • FAX (916) 338-6411

SUPERINTENDENT
Res. Fortune, Ph.D.

BOARD OF TRUSTEES
Raymond F. Bender
Lynn Hall
Jo Teel
Caul L. Kieve
Anita L. Westenbarger

NOV 12 1993
RECEIVED

November 12, 1993

PLANNING DEPARTMENT

Mr. Fred Yeager, Director
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RE: Placer County General Plan Draft EIR

Dear Mr. Yeager:

Thank you for the opportunity to respond to the Draft Environmental Impact Report (DEIR) of the Placer County General Plan Update. Because the Center Unified School District (CUSD) is potentially impacted by the plan, we would like to express concern over the lack of analysis of school facilities needs in the DEIR and the absence of required mitigation for school facilities.

B-14-1

Our staff is in receipt of a response to the DEIR from Mr. James F. Bush, Facility Planner for the Placer County Office of Education dated October 12, 1993. Mr. Bush's response did not include an analysis of school facilities impact for the Center Unified School District and mitigation needed by our district.

The CUSD currently operates four elementary schools, one junior high school, one senior high school, and one continuation high school. A fifth elementary school, Oak Hill Elementary, is scheduled to open near the beginning of the 1994/95 school year. The CUSD uses state standards (California Code of Regulations Section 1811(g)(1 and 2)) to load students into its facilities to determine school capacity. Table 1 lists the capacity of each school and its current enrollment. The CUSD has a total capacity of 4,995 students, including the new Oak Hill Elementary School, and a current enrollment of 4,930 students. During the mid- to late 1980's, the CUSD grew at between 5% and 10% per year. Since 1990, student enrollment growth has slowed because of a decrease in new residential construction. However, it is projected that even without further residential development, the District will be over capacity in the 1994/95 school year. New development will cause additional students to enroll in the CUSD's schools and require additional new schools.

B-14-2

Table 1
 Center Unified School District
 School Capacity and Current Enrollment (1993/94)

SCHOOL	STATE CAPACITY	CURRENT ENROLLMENT	AVAILABLE CAPACITY
Center Elementary	365	517	(152)
Dudley Elementary	723	831	(108)
North Country Elementary	659	897	(238)
Oak Hill Elementary	584	0*	584*
Spinelli Elementary	559	490	69
Center Junior High	711	806	(95)
Center High	1,392	1,316	76
McClellan Continuation High	2	73	(71)
TOTAL	4,995	4,930	(65)

* Projected to open Fall 1994

The CUSD is currently using the State school building program, along with local funding sources, to fund its schools. However, the State building fund is depleted, and no new revenues have currently been approved by the voters. The CUSD has a local general obligation bond that provides about 7.5 percent of the cost new school facilities. Statutory developer fees on new residential development (currently at \$1.65 per square foot) are projected to yield about 31.6 percent of the cost of new school facilities. Together, local general obligation bond revenues and developer fee revenues are estimated to pay for about 39.1 percent of new school facilities needed. Since the state has no school facilities funds, the CUSD has a 60.9 percent revenue shortfall to meet its projected school facilities needs.

The CUSD staff and consultants have carefully examined the proposed development in the DEIR of the general plan update. Table 2 below lists the projected dwelling units to be constructed within the territory of the CUSD.

Table 2
 Projected Residential Development
 Placer County General Plan Update

Project	SFD	MFD	APT	Total
Placer Villages	4,406	1,259	630	6,295
Villages of Dry Creek	7,540	2,152	1,080	10,772
West Placer - Dry Creek	868	0	0	868
Other	100	0	0	100
Total Dwelling Units	12,914	3,411	1,710	18,035
Total EDU*	12,914	1,900	952	15,768

*EDU = Equivalent Dwelling Unit, based on students per dwelling unit with SFD = 1.00

It is estimated that 12,914 single family dwelling units (SFD), 3,411 multi-family units (MFD) and 1,710 apartments (APT) are planned for development. The District's Governing Board-approved student generation factor, or average pupils per dwelling unit, is 79 K-12 students for every 100 SFD, and 44 K-12 students for every MFD and APT. This student generation factor of .79 for SFD and .44 for MFD and APT will be used for projected estimates of future students from new development.

A formula for dwelling unit equivalency (EDU) was also used to estimate the costs per SFD, MFD and APT for school facilities mitigation. SFD were given an EDU of 1.00, based on a student generation factor of 0.79. MFD and APT were calculated to have an EDU of 0.44/0.79 or .556. Mitigation costs were calculated for each EDU and then proportioned by unit type.

Table 3 below lists the projected students for each of the proposed developments listed in Table 2, based on the student generation factors or pupil per dwelling unit ratios explained above. These projections include students with special needs (special education students).

Table 3
 Projected Students by Development Project

Project	SFD	MFD	APT	TOTAL
Placer Villages	3,481	554	277	4,312
Villages of Dry Creek	5,957	947	475	7,379
West Placer - Dry Creek	686	0	0	686
Other	79	0	0	79
TOTAL	10,202	1,501	752	12,455

Table 4 below lists the projected students by school grade level, including students with special needs.

Table 4
 Projected Students by Grade Level

Project	K-6	7-8	9-12	TOTAL
Total Students	5,944	2,158	4,352	12,455

It must be noted that the CUSD currently has no school facilities to house these students; therefore, all potential new development included in the DEIR and General Plan Update would have a significant negative impact on CUSD's facilities.

Table 5 shows the estimated costs for school facilities which would be needed because of the new development in the DEIR listed in Table 2. The costs are listed in 1993 dollars by each school grade level. These costs include only school facilities and do not include administrative facilities and transportation facilities and equipment that would also be needed. Therefore, total facilities costs caused by new development are higher than those shown in Table 5 below.

It is estimated that 8 elementary schools, 2 junior high schools and 2 high schools will be needed to accommodate students from projected new development proposed within the DEIR. Using current construction and site acquisition costs, as well as state square footage standards, these facilities are estimated to cost over \$145 million in 1993 dollars. Developer fees are estimated

Page Five
 Mr. Fred Yeager
 November 12, 1993

to provide approximately \$46 million and general obligation bonds revenues are estimated to provide about \$11 million, leaving a shortfall of over \$88 million. The CUSD must turn to the County of Placer to require that developers adequately and completely mitigate this shortfall as part of mitigation measures adopted in the DEIR.

Table 5
 Projected Students by Grade Level

Grade Level	K-6	7-8	9-12	TOTAL
Total Students	5,044	2,150	4,352	12,455
Schools Needed	8	2	2	11
Cost Per School	\$7,217,617	\$13,748,334	\$30,093,594	
Total Cost	\$57,740,938	\$27,496,667	\$60,187,188	\$145,424,793
Estimated Developer Fees	\$18,270,441	\$8,700,521	\$19,044,486	\$46,015,448
Reduction for G.O. Bond	\$4,351,416	\$2,081,112	\$4,540,608	\$10,973,136
Shortfall	\$35,119,081	\$16,715,034	\$36,602,094	\$88,436,209
Total Cost per EDU*	\$3,662	\$1,744	\$3,818	\$9,224
Reduction for G.O. Bond	\$276	\$132	\$288	\$696
Net Cost per EDU	\$3,386	\$1,612	\$3,530	\$8,528
Cost per SFD	\$3,386	\$1,612	\$3,530	\$8,528
Cost per MFD and APT	\$1,886	\$898	\$1,966	\$4,750
Est. Dev. Fees per EDU	\$1,159	\$552	\$1,208	\$2,919
Shortfall per SFD	\$2,228	\$1,060	\$2,322	\$5,609
Shortfall per MFD	\$727	\$346	\$758	\$1,831

* EDU is Equivalent Dwelling Unit, based on students per dwelling unit with SFD = 1.00

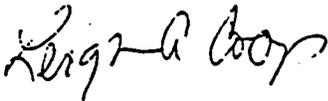
Page Six
Mr. Fred Yeager
November 12, 1993

The bottom part of Table 5 also shows the facilities costs per dwelling unit. It should be noted that data contained these estimates are consistent with data used in the Resolution of Intention for a Mello-Roos Community Facilities District in the West Placer - Dry Creek Community Plan Area. It is our request that this analysis be included in the DEIR for the Placer County General Plan Update.

↑
B-14-2
└─┘

Thank you for your consideration. If you have questions, please feel free to contact me at (916) 338-6337.

Sincerely,



Leigh A. Coop
Director of Facilities

cc: Dr. Rex Fortune, Superintendent
Doug Smith, Business Manager
Mike Winters, Caldwell, Winters, Flores
Marion Cantor, Atty.
Jim Bush, Placer County Office of Education

C. Other Local Public/Quasi-Public Agencies

C-1 Roseville Telephone Company (10/15/93)

C-1-1. General statement of support for General Plan Update

Comment noted; no response necessary.



ROSEVILLE TELEPHONE COMPANY
P.O. BOX 969 • ROSEVILLE, CALIFORNIA 95661
TELEPHONE 786-6141 • AREA CODE 916

ROBERT L. DOYLE
PRESIDENT, MANAGER
THOMAS E. DOYLE
SECRETARY

October 15, 1993

PLACER COUNTY
DATE
RECEIVED

OCT 18 1993

Placer County Planning Dept
Loren Clark
11414 B Avenue
Auburn, CA 95603

PLANNING DEPARTMENT

Dear Loren:

Re: Placer County Draft E.I.R. and General Plan Update

Thank you for the opportunity to review and respond to the County's General Plan Update and Draft E.I.R.

The general plan maps and circulation plan diagrams are very useful to us in planning future expansion and additions to our outside plant facilities.

In a quick general review of these documents it appears the County takes the same basic approach to forecasting future growth as we do, therefore continued communication between city and county planners and utility companies is essential to maintain quality service to our customers.

There currently are regulations governed by the California Public Utilities Commission that require the Roseville Telephone Company to provide telecommunications services to the general public. If, for any reason, we can not do so, they will appoint an organization that can.

We presently have a sphere of public telecommunications facilities that extend past the existing City of Roseville city limit lines, and into Placer and Sacramento Counties. These facilities will be expanded jointly with other utilities as new street infrastructure becomes available in conjunction with development. Our budgeting program ensures satisfactory funding.

State-of-the-art telecommunications services generally are an important component in the every day quality of life enjoyed by both residents and business throughout Roseville and Placer County.

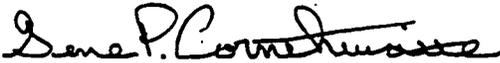
C-1-1

The cost effectiveness of planned development allows us to uniformly develop our telephone facilities economically, especially our underground supporting structures.

General and specific plan proposals also help to minimize costly rearrangements to our facilities in the future. Therefore, the Roseville Telephone Company, as a public utility, fully supports all general plan amendments, specific plan proposals and planned community type developments.

If I can be of further assistance to you, or answer any questions that may arise from your staff or committee members, please feel free to contact me at (916) 786-1206.

Sincerely,



Gene P. Cornthwaite
Engineer

GPC/wsd

C-1-1

C-2 Western Placer Waste Management Authority (10/27/93)

C-2-1. Stanford Ranch West new growth area is incompatible with landfill operations; agricultural designation in area should be retained.

The Stanford Ranch West Specific Plan Area designation no longer appears on the Land Use Diagram.

C-2-2. *Draft EIR* should address land use conflicts around landfill and impacts on landfill operations of nearby urban development

Section 3.2 of the Final EIR discusses land use conflicts; refer to response to comment C-2-1.

C-2-3. *Draft EIR* does not adequately address impacts on solid waste infrastructure

The County believes the level of detail provided in the EIR is appropriate for a general plan EIR.

C-2-4. *Draft EIR* should analyze direct link between population growth and landfill life

Section 5.5 of the EIR provides this information.

C-2-5. *Draft EIR* mitigations (*Draft Plan* policies) should be more closely tied to impacts

The Final EIR includes the full text of the "mitigating" policies and programs, rather than just the policy and program numbers, so the relationship between mitigating policies and the impacts that they mitigate is now clearer.

EIR file



**PLACER COUNTY
DEPARTMENT OF PUBLIC WORKS**

JACK WARREN, Director
JAN WITTER, Assistant Director
ALAN ROY, Deputy Director
REY HUCK, Deputy Director

PLACER COUNTY PLANNING COMMISSION
C/O LOREN CLARK, PLANNING DEPARTMENT
11414 B AVENUE
AUBURN, CA 95603

OCTOBER 27, 1993

RE: PLACER COUNTY GENERAL PLAN DRAFT POLICY DOCUMENT AND EIR

Dear Commissioners,

The Western Placer Waste Management Authority is a joint powers agency formed by the County of Placer and the cities of Roseville, Rocklin and Lincoln for the purpose of promoting safe disposal of solid wastes generated in the western portion of Placer County. Since 1979, the Authority has owned and operated (via contractors) the Western Regional Sanitary Landfill, located on the corner of Athens and Fiddymet in the Sunset Industrial area. To help member agencies meet new state recycling mandates, the Authority intends to begin construction of a materials recovery facility on this property within the next year. Placer County Public Works Solid Waste Division staff provide staff support for the Authority. It is in this capacity that we offer the following comments on the subject documents.

DRAFT POLICY DOCUMENT

An important criteria for selection of the Western Regional Sanitary Landfill site (in the mid-1970's) was compatibility with surrounding land uses. At that time, the immediate neighbors of the site were primarily engaged in dry land grazing or farming. According to the EIR for this project¹, "Population in this area is very low because of the large size of land parcels. Growth has been very slow over the past 70 years. One small rural subdivision exists about 3 miles to the west of the preferred alternative sites. No other exclusively residential area exists within some six miles of the landfill." The Agricultural and Industrial Reserve general plan designations and the associated large lot zoning seemed to provide adequate protection against future residential encroachment.

Although there has been some infilling of light industrial over the last fifteen years, there has been no major threat to continued operation of the landfill. This situation will change dramatically if the General Plan Update is approved as drafted.

C-2-1

¹Page 59-60, "Southwestern Placer County Regional Sanitary Landfill EIR, December 1977". Prepared by the Placer County Public Works Department.

The new growth area identified as Stanford Ranch West is a major concern to the Authority. According to the Draft Policy Document, Stanford Ranch West, which is located immediately south of Authority property, could accommodate as many as 22,500 residents in 8,370 new dwelling units. Commercial and industrial uses are also planned. Based on preliminary plans submitted by Stanford Ranch West proponents², they would like to locate high density residential projects within 1800 feet of disposal cells, medium density residential within 700 feet, and an elementary school within 2200 feet.

To give Commissioners an idea of the impact such a development would have on the landfill, we have compiled a list of complaints and fears voiced by 35 neighbors of the landfill when the Authority acquired a contiguous parcel to the east for long-term expansion³. The commenting neighbors primarily reside in Toad Hill Estates, which is approximately 14,000 feet from active cells. The expansion area will eventually (around the year 2030) come as close as 8900 feet to their homes. Here are their concerns:

odors	dust
illegal dumping	decrease in property values
surface water contamination	ground water contamination
traffic	litter
aesthetics	methane gas migration
noise	fires
seagulls	flooding
"we don't need another Love Canal"	

C-2-1

Some of these concerns are based on actual experience, others are perceptions gathered through reading alarming stories about older, uncontrolled dumps. Some of the problems noted can be completely or partially mitigated through careful management of the facility (e.g. fires, dust, methane gas migration); others are impossible to eliminate in any cost-effective manner (e.g. seagulls, illegal dumping, traffic, aesthetics); still others are impossible to eliminate, except through education, because they exist only in the minds of the residents (e.g. the comparison to Love Canal).

Perceptions are as important in the political process as facts, and 22,500 residents - located much closer to the landfill than Toad Hill Estates - will have a strong political voice. They could easily block the Authority's efforts to obtain final entitlements

² Plans dated June 25, 1993, drawn by Spannagel and Associates for Placer Partners/Stanford Ranch West Inc.

³ A Conditional Use Permit for this expansion was granted by Placer County in 1992, however State permits may not be completed for another five years.

needed to expand the landfill to the east.

In recognition of the potential for conflicts between solid waste disposal sites and other land uses, the Draft Policy Document sets up minimum buffer zones which Stanford Ranch West would presumably need to meet. They are defined as follows:

Commercial - 1000 feet
Industrial - 0 feet
Recreation - 500 feet
Residential - 1000-5280 feet. A one-mile buffer shall be provided for residential uses unless such uses are separated from the solid waste disposal site by other uses that effectively screen the residences from potential nuisance characteristics resulting from the long-term continued operation of the solid waste disposal site.

The Authority appreciates that the Planning Department is attempting to provide some level of protection to the landfill, however we do not agree that the proposed buffers will be sufficient to prevent conflicts. In fact, conflict regarding the residential buffer is almost assured because there really is no effective way to screen homes or apartments from all the "potential nuisance characteristics" perceived by residents.

C-2-1

The Western Regional Sanitary Landfill serves approximately 165,000 people, including residents of Roseville, Rocklin, Lincoln, Auburn, Loomis and unincorporated western Placer County. Over 185,000 tons of garbage were accepted by the landfill in 1992. It provides a vital service which could only be relocated at astronomical expense⁴. The addition of the Materials Recovery Facility (estimated cost of \$21 million) makes protection of this area even more critical.

It is the Western Placer Waste Management Authority's opinion that the best way to protect the public's interest is to retain the existing General Plan and Zoning designations for the areas surrounding the landfill. This action would not constitute a "downzoning" or "taking", it simply requires maintaining the status quo. An acceptable, although less desirable alternative, would be to establish iron-clad buffers of sufficient distance. A residential buffer of at least 5280 feet for all projects would be requested by the Authority. The other buffers proposed in the Draft Policy Document appear to be adequate.

⁴ Landfill permits recently obtained took between 10 and 14 years to complete. See "Reaching the Limit: An Interim Report on Landfill Capacity In California", California Integrated Waste Management Board.

TECHNICAL COMMENTS ON THE EIR

A

A major failure of the Draft EIR is to address the land use conflicts discussed above. To discuss this issue, closure of the landfill should be assumed within ten years of approving a Specific Plan for the Stanford Ranch West growth area. Impacts of closing and relocating the landfill (or constructing a transfer system if assuming out-of-area disposal) should be analyzed.

C-2-2

Impacts of the plan on the solid waste infrastructure in Placer County are also overlooked. For example, in deciding whether there will be impacts to the solid waste infrastructure, the EIR authors conclude that AB-939 diversion programs will reduce the waste stream by 50%, therefore the population increases promoted by General Plan policies do not have an impact. This discussion ignores impacts on handling facilities such as transfer stations and material recovery facilities. Since most diversion will be achieved after the garbage is collected in route trucks, consolidated at the transfer station, transported in large trailers and sorted at the MRF, the existing handling and processing systems must all be expanded. These impacts should be evaluated.

C-2-3

It is also not appropriate to dismiss an increase in landfill disposal tonnage caused by population increases as insignificant just because the increases will be less than previously projected. There is a direct link between population growth and landfill life which should be evaluated.

C-2-4

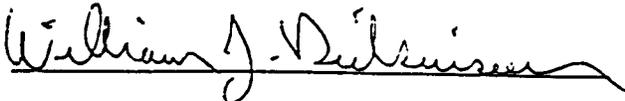
"Mitigations" proposed in the EIR (actually general policies) are not tied to impacts in a way which allows the reader to judge their adequacy. Impacts and mitigations should be directly related.

C-2-5

We have brought several other errors in the Background Report and EIR to the attention of the Planning Department. We hope their consultants will make the necessary corrections.

Thank you for the opportunity to comment. We are available for questions at any time.

COUNTY OF PLACER
DEPARTMENT OF PUBLIC WORKS
JACK WARREN, DIRECTOR



Will Dickinson
Solid Waste Planner

WD:wd
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C-3 Truckee Donner Public Utility District (11/09/93)

C-3-1. A significant part of Truckee-Donner PUD's sphere of influence is in Placer County

The Final EIR recognizes that some future development in Placer County will rely on Truckee-Donner PUD for water service.



Truckee Donner Public Utility District

Business Office
(916) 587-3896

Engineering Services
(916) 587-3944

FAX (916) 587-5056

Board of Directors
Joseph R. Aguera
John L. Corbett
Robert A. Jones
James A. Maass
Patricia S. Sutton

General Manager
Peter L. Holzmeister

November 9, 1993

Loren Clark
PLACER COUNTY PLANNING DEPARTMENT
11414 B Avenue
Auburn, California 95603

PLACER COUNTY
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NOV 11 1993

PLANNING DEPARTMENT

Dear Loren:

The following comments are being sent in response to the DRAFT ENVIRONMENTAL IMPACT REPORT and the DRAFT POLICY DOCUMENT for Placer County.

The TRUCKEE DONNER PUBLIC UTILITY DISTRICT is a special district providing water and electric services to customers in the Truckee area. The District's service area includes portions of both Nevada and Placer Counties. This District has approximately 8400 electric connections and 6000 water connections.

It should be noted that a significant portion of the District's sphere of influence is within Placer County.

C-3-1

If additional information is required, please do not hesitate to contact me. My direct phone line is (916)-582-3908.

Sincerely,

Mike Connell
District Water Planner

- c: Peter Holzmeister General Manager
- Dave Rully Water Superintendent
- Bob Quinn Electric Superintendent
- Ron Reynolds Electric Planner
- Maria Martinez Planning

C-4 Placer County Transportation Commission (11/12/93)

C-4-1. *Draft EIR* should focus on impacts created by new growth areas

While the County concedes that such an analysis might be informative, it does not feel that it would be appropriate, or necessary, for the EIR to isolate the potential traffic impacts of development in the new growth areas. According to the Policy Document, development in the new growth areas will proceed according to the provisions of specific plans that will require a detailed analysis of potential impacts, including traffic impacts. Furthermore, the new growth areas that were the cause of the greatest traffic impacts no longer appear on the Land Use Diagram.

C-4-2. All roadway improvements cited as mitigation should be submitted to PCTC for inclusion in RTP

Following adoption of the General Plan, the County will submit transportation improvements identified in the Policy Document to the Placer County Transportation Commission for inclusion in the Regional Transportation Plan.

C-4-3. *Draft EIR* should recommend pursuit of additional funding sources for improvements not fundable through RTP

While the County understands the difficulty of funding major transportation improvements, it does not feel that the General Plan is the proper forum for recommending a sales tax increase.



PLACER COUNTY
TRANSPORTATION
COMMISSION

855 Lincoln Way
Suite 109
Auburn, CA 95603

(916) 823-4030
FAX 823-4036

- O.C. TAYLOR
City of Auburn
- FERN CHADD
City of Colusa
- ROBERTA BARCOCK
City of Lincoln
- CARL DEWING
Town of Loomis
- KATHY LUND
City of Rocklin
- PAULINE ROCCUCCI
City of Roseville
- RONALD UCHAJ
PHIL OZENICK
Placer County
- CINDY GUSTAFSON
Citizen Representative
- TIM DOUGLAS
Executive Director

November 12, 1993

Loren Clark, Senior Planner
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Dear Mr. Clark:

The staff of the Placer County Transportation Commission have reviewed the Countywide General Plan Draft Policy Element and the accompanying Draft Environmental Impact Report. Our interest in these documents are the issues relating to transportation and circulation. Because several of the policies in the General Plan Draft Policy Document will involve the Commission, we look forward to working with the County in the implementation of the plan. Our specific comments at this time are provided below.

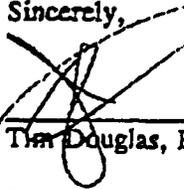
1. The DEIR evaluates the future traffic impacts caused by growth in all jurisdictions. Many of the future congestion problems will be caused by growth in the incorporated areas, as well as the unincorporated areas. PCTC recommends that this DEIR be expanded to include the focused impacts that will potentially be caused by the "new growth areas" of Bickford Ranch, Stanford Ranch West, Villages of Dry Creek, and Placer Villages. Pursuant to California Government Code 65089.3(b), PCTC may eventually require deficiency plans on these specific plans if they are shown to cause congestion worse than CMP Level of Service Standards. C-4-1
2. Between the "2010 Base Network" and the "2010 Mitigated Network", the DEIR includes several capacity increasing projects that have not been submitted to PCTC for inclusion into the Regional Transportation Plan (RTP). Some of these projects are not completely within the jurisdiction of Placer County. Any projects needed for mitigation of the General Plan should be included in the RTP if they are eventually to be implemented. C-4-2
3. Many of the projects that are recommended as mitigation measures are not fundable under any scenario of the PCTC Regional Transportation Plan. PCTC recommends that pursuit of an additional funding source be recommended in the General Plan, such as a 1/2 cent sales tax for transportation. If the projects cannot be shown as fundable under a reasonably constrained scenario, PCTC will have a difficult time recommending them for inclusion into the SACOG federal Metropolitan Transportation Plan. C-4-3

Loren Clark
November 15, 1993
Page 2

As you may know, the PCTC is circulating a draft Regional Transportation Plan for comments. In addition, we are updating portions of the Congestion Management Program. Because local general plans are an important element to our analysis, we appreciate the opportunity to provide input and offer our participation in the development of the County's general and specific plans.

If you would like to discuss these comments, please call Will Garner of the PCTC staff at 823-4027.

Sincerely,



Tim Douglas, Executive Director

TD:cp

C-5 Foothill Airport Land Use Commission (11/12/93)

C-5-1. *Draft Plan's* noise standards are inconsistent with FALUC's (attached)

The referenced standards from the Policy Document have been modified consistent with the commentor's recommendation.

FOOTHILL
AIRPORT LAND USE COMMISSION
FOR
EL DORADO, NEVADA, PLACER, & SIERRA COUNTIES

TO: Loren Clark, Senior Planner
Placer County Planning Department

FROM: Mike Reeves, Staff
Foothill Airport Land Use Commission (FALUC)

DATE: November 12, 1993

RE: Comments on the Draft Placer County General Plan EIR, Draft General Plan Background Report, and Draft General Plan Policy Document

PLACER COUNTY
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AMOR

PLANNING DEPARTMENT

The Noise Element of the October 1993 Countywide General Plan Draft Policy Document, which accompanies the Draft EIR, contains land use compatibility guidelines (Figure 9-1, page 123) for development in the vicinity of transportation noise sources, including airports. These guidelines are adapted from the 1990 General Plan Guidelines published by the State Office of Planning and Research (OPR). The State guidelines apply generally to all transportation noise sources. The land use compatibility guidelines contained in the draft Placer County General Plan identify, among other land uses, residential development as a "conditionally acceptable" land use within a range of 60 to 70 dB Community Noise Equivalency Level (CNEL). Under this classification, residential land uses may be permitted if effective noise mitigation measures have been incorporated into the development design.

The California Department of Public Works, Division of Aeronautics releases noise compatibility guidelines specifically for land uses within airport CNEL noise contours (Title 21, Subchapter 6, California Code of Regulations). These guidelines have been adopted by airport land use commissions statewide, including the FALUC (attached). Title 21 guidelines consider residential development to be an incompatible land use within the 65 dB CNEL noise contour, notwithstanding noise mitigation measures.

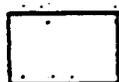
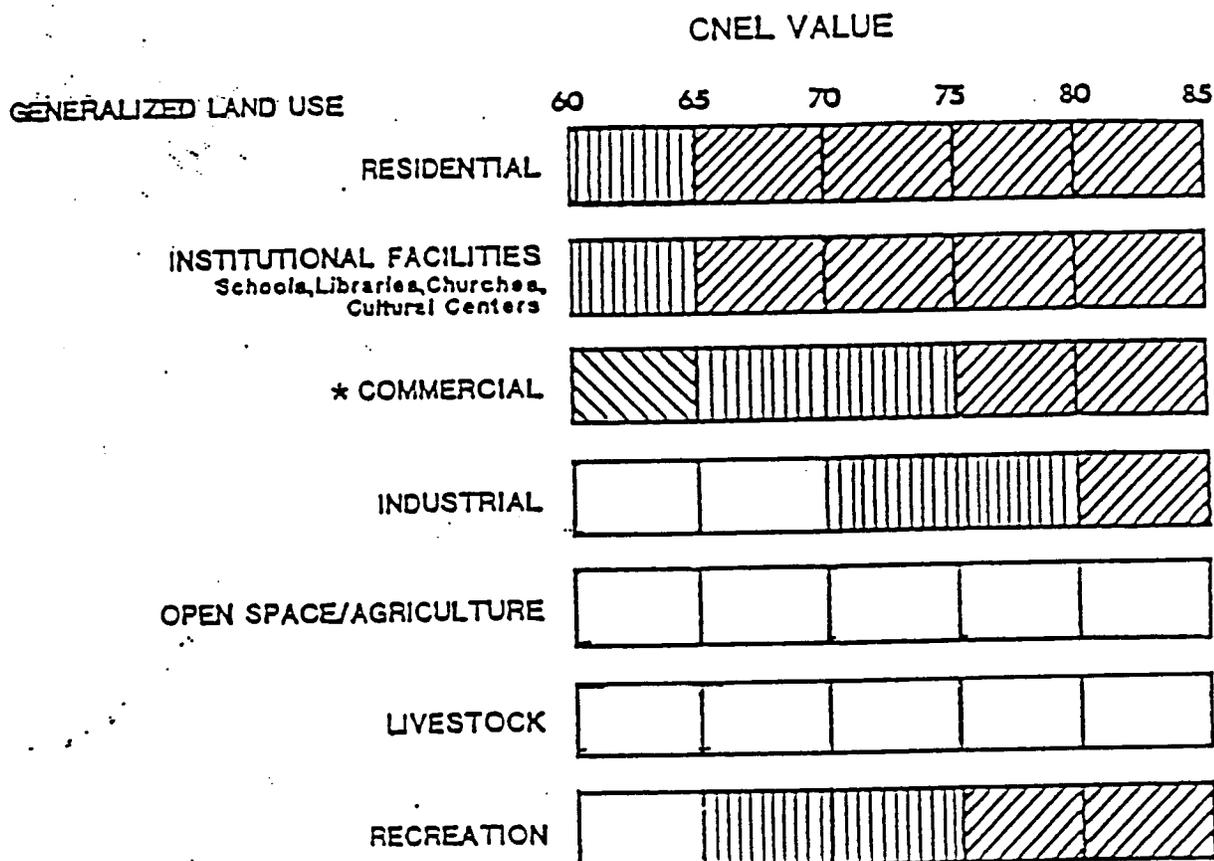
The land use compatibility guidelines for noise levels contained in the draft General Plan Policy Document are inconsistent from adopted FALUC guidelines in conditionally permitting new residential development within the 65 dB CNEL noise contour. Section 65302.3 of the California Government Code (attached) states that general plans shall be consistent with CLUPs adopted by local airport land use commissions unless the county or city adopts findings that the general plan remains consistent with the purposes of the Airport Land Use Commission Law.

Thank you for the opportunity to comment on the Draft Placer County General Plan and General Plan EIR. Please contact Betty Riley or me at 823-4703 with any questions.

C-5-1

Figure 5

LAND USE COMPATIBILITY CHART FOR AIRCRAFT NOISE



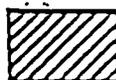
SATISFACTORY



ALLOWABLE WITH NORMAL CONSTRUCTION, WINDOWS SEALED,
FORCED AIR VENTILATION, OUTDOOR ACTIVITY MAY BE INTERRUPTED



CAUTION, NOISE INSULATION RECOMMENDED



INCOMPATIBLE LAND USE

* It is recommended that between 65 and 60 CNEL, noise insulation be incorporated into design and construction of those portions of the building area where the public is received, office areas, or where interior noise levels are generally low.

APPENDIX C

THE PLANNING AND ZONING LAW
(California Government Code)

TITLE 7. PLANNING AND LAND USE

DIVISION 1. PLANNING AND ZONING

Article 5. Authority for and Scope of General Plans

SECTION 1. Section 65302.3 of the Government Code is amended to read:

65302.3. (a) The general plan, and any applicable specific plan prepared pursuant to Article 8, (commencing with Section 65450), shall be consistent with the plan adopted or amended pursuant to Section 21675 of the Public Utilities Code.

(b) The general plan, and any applicable specific plan, shall be amended, as necessary, within 180 days of any amendment to the plan required under Section 21675 of the Public Utilities Code.

(c) If the legislative body does not concur with any provision of the plan required under Section 21675 of the Public Utilities Code, it may satisfy the provisions of this section by adopting findings pursuant to Section 21676 of the Public Utilities Code.

C-6 City of Folsom Community Development (11/15/93)

C-6-1. *Draft EIR's proposed widening of Auburn-Folsom Road is inconsistent with Folsom's General Plan*

Comment noted; no response necessary.

C-6-2. *Draft EIR should include existing and projected ADT for Barton/Santa Juanita Road*

The current volume on Barton Road at the County line is about 1,200 ADT. The projected 2010 traffic volume for this roadway is about 8,000 ADT.

C-6-3. *Draft Plan should include policy directing Placer County to coordinate circulation improvements with neighboring jurisdictions*

The Policy Document includes such policies (e.g., 3.A.9 and 3.D.2).

CITY OF FOLSOM
COMMUNITY DEVELOPMENT DEPARTMENT
50 Natoma Street
Folsom, California 95630

November 15, 1993



PLACER COUNTY
DATE RECEIVED
NOV 18 1993
PLANNING DEPARTMENT

Loren Clark, Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn, California 95603

Re: Placer County General Plan Update and DEIR

Dear Mr. Clark:

Thank you for the opportunity to review and comment on the Placer County General Plan, and Draft Environmental Impact Report. My few comments are as follows:

- According to the DEIR, the projected ADT along auburn-Folsom (at the City of Folsom limit line) in the year 2010 is 37,000. Currently the ADT is 15,000. The projected LOS is F if there are 4 lanes at the year 2010. A proposed mitigation is to widen auburn-Folsom Road to six lanes at the City of Folsom limit line. The proposed widening of Auburn-Folsom Road is consistent with the City of Folsom General Plan.
- The traffic study in the EIR should include the existing and projected ADT for Barton/Santa Juanita Road which enters the City of Folsom and Sacramento County.
- The bikeway along Auburn-Folsom Road is designated as a Class III facility. The bikeway within along Folsom-Auburn Road (Folsom City limits) is a Class II facility. Coordination of bikeways, as well as roadway improvements, between our jurisdictions is beneficial. I recommend that a General Plan Policy directing the Placer County staff to coordinate circulation improvements with neighboring jurisdictions be included in the General Plan.

C-6-1

C-6-2

C-6-3

The City of Folsom appreciates the opportunity to share our comments, and we look forward to receiving a copy of the Final General Plan Environmental Impact Report.

Cordially,

BRAD KORTICK, AICP
Community Development Director

BK:ja
clark, jr

C-7 County of Sacramento Planning and Development (11/15/93)

- C-7-1. There are several discrepancies between Draft Sacramento County Plan and Draft Placer County Circulation Diagram (listed)

The County has reviewed the designations of these roadways and made modifications to Policy Document as appropriate.

- C-7-2. Difficult to reconcile designations on Circulation Diagram with *Draft Plan* text descriptions

The County has reviewed the Circulation Plan Diagram and the text of the Policy Document to ensure that they are consistent with one another.

- C-7-3. A number of roadways on Circulation Diagram do not appear in Table I-7 of *Draft Plan*

Table I-7 in the Draft Plan does not include roadways in the incorporated areas of Placer County nor does it include post 2010 roadways. This issue has been clarified in the General Plan Policy Document.

- C-7-4. Final EIR should focus on impacts of Placer Villages and Villages of Dry Creek, especially impacts on Sacramento County

While the County concedes that such an analysis might be informative, it does not feel that it is necessary for the EIR to isolate the potential impacts of development in the new growth areas. According to the Policy Document, development in the new growth areas will proceed according to the provisions of specific plans that will require a detailed analysis of potential impacts. Furthermore, the Placer Villages Specific Plan designation no longer appears on the Land Use Diagram.

- C-7-5. Final EIR should address impacts of South Placer development on streets and highways in Sacramento County

Refer to common response #3.



COUNTY OF SACRAMENTO

PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT

827 SEVENTH STREET, ROOM 230
SACRAMENTO, CALIFORNIA 95814
Telephone: (916) 440-6141
FAX: (916) 440-6400

THOMAS W. HUTCHINGS
DIRECTOR

PLACER COUNTY
DATE RECEIVED
NOV 16 1993
PLANNING DEPARTMENT

November 15, 1993

Loren Clark
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Dear Mr. Clark

Thank you for the opportunity to review the Draft Placer County General Plan and associated Draft EIR. The Sacramento County Planning Department would like to offer the following comment on these documents.

General Plan Update Draft Policy Document:

1. There are a number of discrepancies between the Draft Sacramento County General Plan and the Draft Placer County Circulation Plan Diagram. These include:

<u>Roadway</u>	<u>SAC CO Draft Circulation Plan</u>	<u>Placer County Draft Diagram</u>
16th Street	Does not extend to Co. line Post-2010 Art S of Kasser Rd	Urban Arterial (4-6 lane??) Not in Table I-7.
Walerga Rd.	Arterial	Urban Arterial (4-6 lane??) Not in Table I-7.
Don Julio	Arterial	Not shown.
Cook Rielo Rd	Not shown	Urban Collector (2 lane??) (Text says Rural Collector).
Antelope North Rd	Post-2010 Arterial	Urban Arterial (4-6 lane??) Not in Table I-7.
Barton Road	Not shown	Urban Arterial (2-4 lane??) Text says Urb/Suburb Minor Art
Auburn Folsom Rd	Thoroughfare (in Folsom)	Urban Arterial (4-6 lane??) (Text says Major Arterial).

C-7-1

placer/st/11-15-93

2. Also, we had some difficulty reconciling the designations on the Circulation Plan Diagram with the definitions in the Draft Policy Document text in Table I-6. These terms could be clarified.
3. Finally, a number of the roadways shown on the Diagram do not appear in Table I-7 of the Draft Policy Document.

C-7-2

C-7-3

Draft Environmental Impact Report:

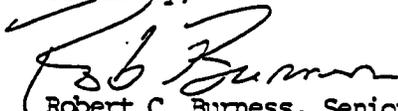
1. The Final EIR should address the impacts of development of the Placer Villages and Villages of Dry Creek Specific Plan Areas, including growth inducing to portions of Sacramento County.
2. The Final EIR should address the traffic impacts of development in South Placer County on freeways and surface streets in Sacramento County.

C-7-4

C-7-5

During this review, we also noted that our Draft General Plan incorrectly depicts certain roadways in South Placer County, and we will move to correct that. We look forward to continued cooperation in the future.

Sincerely,



Robert C. Burness, Senior Planner

C-8 Placer County Air Pollution Control District (11/15/93)

C-8-1. PCAPCD notes three minor text corrections to *Draft EIR*

The Final EIR incorporates the suggested changes.



PLACER COUNTY
AIR POLLUTION CONTROL DISTRICT
11464 B Avenue, Auburn, CA 95603
(916) 889-7130 FAX (916) 889-7107

MEMORANDUM

TO: Loren Clark, Senior Planner
FROM: Ann Hobbs, Air Pollution Specialist/Planner *AH*
DATE: November 15, 1993
SUBJECT: Placer County General Plan - Draft EIR

The Placer County Air Pollution Control District (APCD) has reviewed the Placer County General Plan - Draft EIR. The following comments should be incorporated.

1. On page 8-37, the first paragraph, second sentence, under Increase in Ozone Precursor, beginning with "Most of these emission ...", should emission be emissions?
2. On page 8-39, under Population Estimates Exceeding the 1991 AQAP Population Growth Estimates, the reference to Implementation Programs should be 6.15 through 6.21.
3. Same page, under Cumulative Degradation of Air Quality, add the following to the third sentence, fifth line beginning with "combined with population-related emissions increases, and transported pollutants, etc.

C-8-1

If you have any questions, please contact Mr. Walter Arenstein, APCO or Ms. Ann Hobbs at (916) 889-7130.

C-9 Placer County Flood Control and Water Conservation District (11/15/93)

C-9-1. Miscellaneous recommended changes to *Draft Plan* text

Comments noted; recommended changes not made to Policy Document.

C-9-2. Comments on setting portion of *Draft EIR* drainage discussion

The Final EIR has been revised in response to this comment.

C-9-3. *Draft EIR* should note that hydrologic watershed models account for cumulative impacts

The recommended information has been added to the Final EIR

C-9-4. Minor text correction to methodology section of *Draft EIR* drainage discussion

The recommended correction has been made in the Final EIR.

C-9-5. Question concerning *Draft EIR* drainage analysis reference to "Eastern County"

The Final EIR has been modified in response to this comment.

C-9-6. *Draft EIR* drainage text appears inconsistent with tabular information

The Final EIR corrects this inconsistency.

C-9-7. Comment about effect of potential changes in NPDES regulations

Comment noted; no response necessary.

C-9-8. Minor text corrections to *Draft EIR*

The references to mitigating policies will be corrected in the Final EIR.

C-9-9. *Draft EIR* Table 5-12 should be eliminated or qualified with recommended language

The County agrees with this comment; Table 5-12 from the DEIR implied a level of precision in the analysis that was impractical, given the information available. The table has been eliminated from the Final EIR.

C-9-10. Comments on Issues and Options Report (attachment)

This comment addresses information contained in the Issues and Options Report; no response necessary..

PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

JACK WARREN, Director
DENNIS HUFF, District Engineer
TIM NASH, Associate Engineer
DIANE RAMAR, Secretary

MEMORANDUM

TO: Loren Clark

DATE: November 15, 1993

FROM: Dennis Huff DH

SUBJECT: Draft Placer County General Plan and EIR - Comments

Draft General Plan

Policies 4.E.6 and 4.E.613 say about the same thing.

Policy 4.E.11 This policy should address mitigation of significant adverse increases in stormwater runoff.

] C-9-1

Implementation Programs 4.13, 8.3 and 8.5 should remove reference to our District since we are a separate special district, not a County Agency.

Draft General Plan EIR - Drainage

Environmental Setting (Page 5-43) The fifth paragraph (the first paragraph on Page 5-44) discusses use of storage facilities for mitigation. While storage facilities can be useful in mitigating increases in runoff peaks or volume, a "no net increase" policy is not always an appropriate mitigation. Storage facilities are not always feasible and can worsen conditions in some cases. Further, alternative forms of mitigation may be more feasible than storage under some circumstances. Moreover, not all increases in runoff peak or volume are necessarily both significant and adverse.

] C-9-2

Methodology (Page 5-44) It should be mentioned that the hydrologic watershed models used in watershed planning account for the cumulative impacts of development on flows and volumes.

] C-9-3

The first sentence in the second paragraph should be modified as follows: "New flood control facilities cannot always be identified".

] C-9-4

Implications ... Land Use Diagram (Page 5-44)

Is "Eastern County (Page 5-45) the remainder of Placer County outside Cross Canal and Dry Creek Watersheds? If so, this section be moved after the sections on the Cross Canal and Dry Creek Watersheds.

C-9-5

The narrative states that the largest increase in recent imperviousness will occur in The Dry Creek Watershed (Page 5-46). However, Table 5-11 clearly shows that The Cross Canal Watershed will actually experience the greatest increases.

C-9-6

The next to last paragraph in this section (Page 5-51) states that NPDES permits will be required when the population reaches 100,000. Under current regulations there may be some question as to whether the total population would be considered as one for the purposes of the program. However, the regulations are rapidly evolving and changing. It now seems likely that regulations will emerge from the various proposals now being considered by Congress, the EPA and the State Water Resource Control Board which will require the County to take action to improve the quality of stormwater runoff within the next few years under existing population levels.

C-9-7

General Plan Policy Response

Applicable policies and programs are cited following the first paragraph. The reference to policy "4.3.7" should read "4.E.7". The relevant policies and programs in 4.F should be included as well.

C-9-8

Table 5-12: Required Regional Storage

This table should be eliminated because it could be perceived as a commitment.

If the table is retained, it should be extensively qualified by changes to the title, contents and notes that it presents estimates for purposes of illustration. Some corrections and clarifications are also needed:

- o The significant new development areas added to the General Plan in the Cross Canal watershed are in addition to the previous General Plan land uses and, therefore, the amount of storage required should exceed our estimate of 3600 acre-feet by a considerable amount. The method we used for counting impervious area appears to be different from the method in the EIR, thus possibly blurring the comparison.

C-9-9

Loren Clark
Draft Placer County General Plan and EIR - Comments
November 15, 1993

Page 3

- o The regional storage facilities in the Cross Canal Watershed Plan have an objective and degree of accomplishment different from those in the Dry Creek Plan.
- o Note 1 states that an 8% increase in pervious area applied to both watersheds. The figures we used were substantially greater; on the order of 100% to 200%. We can provide more specific figures, if desired.

C-9-9

cc: Jack Warren
Rey Huck
Bob Costa
David Smith

DH:dr
Ref18.79

Subj

PLACER COUNTY
FLOOD CONTROL AND WATER CONSERVATION DISTRICT

JACK WARREN, Director
DENNIS HUFF, District Engineer
TIM NASH, Associate Engineer
SHARLET PYNE, Secretary

MEMORANDUM

Date: December 29, 1992
To: Loren Clark, Planning Department
From: Dennis Huff *[Signature]*
Subject: General Plan Issues and Options Report - Review of Chapter 3

1. The discussion of two levels of flooding ("large scale" and "local") in the issue summary becomes confusing when a third ("regional") is brought into the discussion without introduction.

Three levels seem appropriate. At the "large-scale" level, State and Federal government agencies assert their jurisdiction in a lead role. Major watersheds and stream systems are the object at this level. Examples of these include the American, Bear, and Truckee Rivers and their major tributaries.

"Local" refers to drainages within the jurisdiction of a single municipal government.

The "regional" level includes drainage areas and stream systems that involve more than one municipality but are not under State or Federal jurisdiction. Examples include Dry Creek, Miners Ravine, Auburn Ravine, and Pleasant Grove Creek. As indicated in the discussion, the Flood Control District is expected to have jurisdiction at this level.

C-9-10

2. The issue summary (paragraph 2) mentions "undersize surface drainage channels" as a source of "local" problems in western Placer County. It would be more accurate to say that a common source of flooding problems in this area is the location of structures in the floodplains of natural watercourses where the extent of the floodplain was not known.

3. The reference to our master planning studies (paragraph 3 in the issue summary) should be modified to read "... studies provide *initial* regional masterplanning...".

4. The second key question is an old issue and is confusing given the existence and purpose of the Flood Control District and the County's commitment to participation in it.

5. Option I is also an old issue. The County has committed to participation in and through the Flood Control District as the entity with regional jurisdiction.

It is also unlikely that Federal or State agencies would play a comprehensive, lead role in the regional flooding problems in western Placer County. These agencies have significantly reduced their involvement in watersheds of this scale.

Coordination and participation with State and Federal agencies are more likely. Coordination and participation are also likely with adjoining regional entities such as the Sacramento Area Flood Control Agency, the Sacramento County Water Agency or the Sutter County Flood Control and Water Conservation District.

6. Identifying floodplains and managing development in them is one of the most basic and cost-effective flood control strategies, and it would be appropriate to present it as an option in this document.

C-9-10

Floodplain management measures can range from requiring elevation or other floodproofing of structures and preservation of a channel capacity, as in the basic FEMA Flood Damage Prevention Ordinance, to prohibitions on structures and maintenance of generally natural conditions in the floodplain, such as is intended with the goals and policies in the Dry Creek West Placer Community Plan. The latter types of measures are recommended where possible since they help avoid cumulative increases in flow rates and velocities resulting when the floodplain is modified to a more efficient hydraulic conveyance through filling, clearing or other activities.

A floodplain management strategy is especially cost-effective if multiple objectives are accomplished in the floodplain. Maintenance of aquatic, riparian and other terrestrial wildlife habitats are typical joint uses. Parks, bike and hiking trails, athletic fields and farming are further examples of potentially compatible uses of portions of the floodplain.

cc: Jack Warren Bob Costa
 Rey Huck Tim Nash

JW:DH:dh

c:\admin\gpc\p3

C-10 Placer Hills Fire Protection District (11/15/93)

C-10-1. *Draft Plan* should specify standards for emergency medical response, which should be shorter than for fire protection

While the County acknowledges that this issue is important, it does not feel that the Countywide General Plan needs to provide such specific policy direction on this issue; no change to the Policy Document has been made.

C-10-2. *Draft Plan* should include policy and program language related to vehicle accidents

Refer to response to comment C-10-1.

C-10-3. *Draft Plan* should recognize effects of rural and suburban development on fire fighting, particularly water and volunteer firefighters

The Policy Document includes policy language supporting the standards of local fire protection agencies, which are responsible for setting standards based on their individual circumstances and needs.

C-10-4. *Draft Plan* should include standards more stringent than State law in very-high- and high-fire hazard areas

Refer to response to comment C-10-3.

C-10-5. Plan should identify evacuation routes and standards and identify threat of conflagration in terms of interval.

The County feels that policies in the Policy Document are sufficient, and does not feel that the detailed EIR analysis suggested by the comment is appropriate at the general plan level.

C-10-6. *Draft Plan* should more definitively recognize complexity of wildland fire hazard management

Comments noted; no response necessary.

C-10-7. Many *Draft EIR* mitigations can only be accomplished through active County commitment

The County understands the importance of its role in contributing to fire protection and feels that the Policy Document recognizes this importance through its policies and programs.

**PLACER HILLS
FIRE PROTECTION DISTRICT**

SERVING

Applegate - Clipper Gap - Eden Valley - Meadow Vista - Weimar
Emergency Phone: 911 Business: 878-0405
PO Box 308, Meadow Vista, CA 95722

Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

November 15, 1993

Attention: Loren Clark, Senior Planner

SUBJECT: Draft EIR - Placer County General Plan Update

The following Placer Hills Fire Protection District responses to the Draft EIR - General Plan Update have application to county-wide issues that directly impact upon fire protection service delivery. The inter-related special district or County-provided facilities and services issues are also addressed in this response.

Site specific issues are addressed for the Lower Sierra Geographic Area in the Meadow Vista-West Applegate Community Plan area and the Weimar-Applegate-Clipper Gap General Plan area.

FIRE PROTECTION SERVICES

The Placer Hills FPD Board of Directors now provides: Fire Protection Services, First-Responder Emergency Medical Services, Rescue Services, Hazardous Material Emergency Services, and Other Services relating to the Protection of Life and Property under authority of the State of California Health & Safety Code Sections 13800 et seq - the Fire Protection District Law of 1987. The Placer Hills FPD had provided Ambulance Services until the early 1980's, when State law was changed, and the County assumed the responsibilities for contracting private ambulance services.

Goal 4.1 [p. 75 Draft Policy Document (DPD)]

To protect residents of and visitors to Placer County from injury and loss of life and to protect property and watershed resources from fires.

DEIR Response #1: The Policy 4.1.11 does not specify standards for average response times to medical aid emergency calls by private ambulance services, paramedics, EMTs, nor first responder medical aid. By necessity these response time standards need to be quicker than to fire call standards (Policy 4.1.2) in order to save lives, reduce human suffering, and to hasten the transportation of victims to area hospitals.

C-10-1

DEIR Response #2: The DPD needs to add Policy 4.I.12 for Vehicle Accidents, Rescues & Fires. The PHFPD finds there are a significant number of such emergency responses on County Roads and State Highway I-80 within the Fire District while there is no direct funding to the District for this service. Over the past three years PHFPD call volume averaged 20% of the emergency responses or 109 vehicle accidents per year. The County-wide number of such emergencies must be great.

C-10-2

While many of the "victims" are District and County residents, there is a significant number of visiting motorists and commercial vehicles involved in accidents that require Fire District emergency responses. This issue is common to the fire service throughout Placer County. The County and the State share sales taxes imposed upon new and used vehicles along with sharing vehicle registration fees. As of November 2, 1993 State Constitution Article XIII declares that public safety is the first responsibility of local government and provides, as of January 1, 1994, the additional one-half percent sales tax is to be directed to public safety activities.

The DEIR and DPD need to include an **Implementation Program** and a **Funding Policy** for this important public safety issue.

DEIR Response #3: In Policy 4.I.3 the County Planning and Building Departments need to recognize how their actions directly impact (are often cumulative impacts) on the fire protection systems that are staffed mainly with volunteers and these fire fighter's ability to meet Fire Flow needs of the larger residence construction being approved in rural and suburban areas. Firefighting in rural areas is often limited in one way or another in the ability to delivery or apply water to a given fire. "In general, pumping capacity or water delivery capability is the least 'limiter' among the Placer County fire districts. Water supply is often the greatest 'limiter'. The second greatest 'limiter' is" fire fighting personnel (The Placer County Fire Protection Study and Recommendations - 1980, pp. 15-18).

C-10-3

Also, the County needs to authorize water tender fees in rural areas in lieu of individual on-site water requirements in order to help meet ISO 8 Rating standards.

Goal 8.C [p. 113 Draft Policy Document (DPD)]

To minimize the risk of loss of life, injury, and damage to property and watershed resources resulting from unwanted fires.

DEIR Response #4: Policy 8.C.2 must address the very-high-fire-hazard areas and the high-fire-hazard areas of Placer County where the vegetation fuel loading often exceeds 40 tons per acre. Fuels Management and Fire Hazard reduction measures need to be applied to these existing areas before new sources of Risk from Fire, ignition sources from new development and the population growth cited in the DEIR, are added to an already dangerous situation. State law only requires the minimum of a 30 foot clearance around structures. To meet acceptable levels of homes destroyed by wildfire in these fire-hazard areas will require the removal and

C-10-4

management of the flammable vegetation for 80-100 feet. The steeper slopes will require more than 100 feet of clearance. These Fire Hazard Reduction standards need to be applied to the existing homes by County Ordinance before more risks are added. Such an Ordinance will create a Defensible Space surrounding each home to reduce the wildfire threat and allow firefighters an area in which to safely operate.

Climate: Placer County is blessed with a "Mediterranean-Type". This is a climate, having mild winters and long, hot and dry summers. This climate has an important influence on the natural vegetation of mixed-conifer forest, chaparral, and mixed-oak-woodland. Climate also plays a direct role in the annual threat from wildland fire. The native living vegetation, surrounding the rural residences is deceptively flammable because of its dryness, its structure, and dense growth. The wildland fuels do not readily decompose in Mediterranean climates and as a result the dead fuels are unusually prone to fire, they continue to build up, and create a serious fire hazard. The area has a modern-history of high intensity fires, especially along the river drainages. The possibility of a conflagration exists each summer due to it's climate, summer weather, and the natural fuels.

C-10-4

DEIR Response #5: In Policy 8.C.7 the County will need to plan and promote new fuel breaks and emergency access routes for emergency services as the rural areas become developed. In addition the County must develop and identify Evacuation Routes & Standards, including evacuation sites and centers, in the DEIR Transportation and Circulation Elements in order to aid the citizens and to prevent the loss of their lives from conflagration such as occurred in southern California last month and in Oakland two years ago. The DEIR or supporting documents need to identify the threat or probability of a conflagration occurring in the high-fire-hazard areas - as expressed in a Conflagration Interval - such as "one in 35 years".

C-10-5

DEIR Response #6: Policy 8.C.11. needs to recognize that managing wildland fire hazards goes along with all of the following: long-term comprehensive fuel management programs, forest rehabilitation, open space, reforestation, wildlife-habitat management, *forest-timber management, and habitat conversions and they all are interrelated. Impacts on vegetation, forests, and woodlands due to the growth and development described in the Countywide General Plan DEIR will become more significant each year. The role the native vegetation plays on property values, citizen well being, the environment, and fire safety cannot be understated and must be looked at as a whole rather than independent policies or piece-meal issues.

C-10-6

*The Lower Sierra Area timber lands were harvested from time to time but have not been managed either for timber production or as wildlife habitat.

The Lower Sierra Area timber land conversions for 1993, on three acre parcels and smaller, are estimated at over 400. This is twice the number for 1992. Many of these conversions are on single family parcels where all merchantable trees are removed. These parcels are permanently removed from timber production. These parcels are now open to greater sunlight for brush and shrub growth.

The DEIR assumes that the conversion of natural vegetation communities to urban and suburban land uses results in a total loss of the associated wildlife species.

Development in suburban and rural residential areas is assumed to result in partial vegetation removal (permanent or temporary) associated with development activity, recreational use, rural residential activities and wildlife disturbance by construction activities and human habitation.

Historical note: The late seral or old growth mixed conifer forest and oak-woodlands, in the area, were clear cut between 1850 and 1890 by the Gold Rush mining industry and for the construction and the operation of the Central Pacific Railroad. The conifer forest was used for mine timbers; lumber and shakes for the mining towns and new settlements. After 1860 the railroad was given all the odd-numbered sections of land, twenty miles each side of the right-of-way. The Central Pacific reached Clipper Gap on June 10, 1865 and the railroad was completed on May 10, 1869. The conifers were used for railroad ties, trestles and bridges, snow sheds, and station construction while the oaks were used to fuel the locomotives until the late 1890s. The "railroad lands" were then sold and cleared for towns, farms and orchards. The second growth conifer forest was again heavily cut, with little or no regulation, during World War II and during the California housing boom of the 1950s and 1960s.

C-10-6

Wildfires were quite common since settlement days and fire suppression actions were negligible until the 1930s. Aggressive fire protection over the past 60 years has contributed to the accumulation of heavy fuel loadings.

The Heavy fuel loadings now threaten homes and improvements, wildlife habitat as well as habitat for sensitive species, and forest-woodland tree canopies with costly destruction. Any homes and improvements lost to wildfire will be rebuilt in a few short years while the forest-woodland canopy will take 70 to 100 years to be replaced. Unless the habitat is rehabilitated and managed it may be permanently damaged and lost to high intensity fires.

MUTUAL AID

DEIR Response #7: The DEIR and DCD understate the fire protection-public safety responsibilities of the Board of Supervisors. The importance of the existing CSA's standards for fire protection service levels provided by Placer County, fire facilities and equipment needs as well as any current deficiencies need to be included in the DEIR. The Office of Emergency Services role in fire evacuation planning, large emergency management, heavy rescue equipment, hazardous material spill equipment and spill management needs to be included.

C-10-7

Many of the public safety-fire protection issues and policies in the DEIR relating to fire prevention, arson investigation, fire suppression, UBC and UFC standards, rescue services, vehicle accidents, medical-aid (ambulance to first responder), wildland fuel management, Defensible Space, and hazardous material emergencies can only be put into effect through County Ordinances by the Board of Supervisors.

Many actions by the Board of Supervisors, such as the Economic Development Agency, encourages growth and increases the population along with the new homes requiring additional public safety services from fire districts and water districts. The

future growth projections in the DEIR will have even greater impacts upon the special district's ability to maintain the existing standards and levels of service. Many of the impacts identified need to be mitigated directly by the Board of Supervisors in the form of County Ordinances, through direct public safety funding for districts, or by providing County dispatch services and equipment purchases.

C-10-7

For the Placer Hills Fire Protection District Board of Directors,



Stan MacDonald, Director
15839 McElroy Road
Meadow Vista, CA 95722
(916) 878-0489

C-11 Nevada Irrigation District (12/16/93)

C-11-1. Information regarding the status of North Auburn Treatment Plant improvements.

The references in the Final EIR to the North Auburn Treatment Plant reflect the updated information.

287,000 ACRES SITUATED IN NEVADA, PLACER, SIERRA & YUBA COUNTIES

NID Nevada Irrigation District

10836 ROUGH & READY HWY. • P.O. BOX 1019 • GRASS VALLEY, CA 95945-1019 • (916) 273-6185

AUBURN & LINCOLN: 878-1857
COLFAX: DIAL OPERATOR, ASK FOR ENTERPRISE 14293
FAX: 477-2646

December 16, 1993

IN REPLYING REFER
TO FILE NO.

5/1-PC

Attn: Loren Clark, Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

PLACER COUNTY
DATE RECEIVED
DEC 20 1993
PLANNING DEPARTMENT

Re: Placer County General Plan Update
Draft EIR

TO WHOM IT MAY CONCERN:

The District has reviewed the referenced Draft EIR and has the following comments:

. Draft Environmental Impact Report

Chapter 5, INFRASTRUCTURE, page 5-10, Auburn-Bowman section:

"The existing domestic distribution systems in this planning area are currently operating at capacity. PCWA and NID will have to expand their existing facilities to meet the project demands."

The North Auburn Treatment Plant was nearing capacity at the time information was compiled; however, expansion of this facility is currently being done and projected completion is early 1994.

The cost of the expansion of pipeline conveyance systems (or distribution systems) is generally the responsibility of the developers of certain projects or of the applicable property owners.

. Draft Policy Document

Section 4, PUBLIC FACILITIES AND SERVICES, Page 67, section on Implementation Programs, 4.7:

- a. "A private well monitoring program to evaluate the quantity and quality of groundwater supplied to newly constructed private domestic wells;"

C-11-1

Placer County Planning Department
Page 2 - Placer County General Plan Update
Draft EIR
December 16, 1993

C. "A program to monitor and evaluate surface
water quality in major reservoirs and rivers."

This type of program should be coordinated with the State
of California in regard to the mandated Sanitary Watershed
Survey, which is to be completed in 1996.

Page 70, section on Stormwater Drainage, 4.E.17:

"The County shall, wherever feasible, require
that domestic water supply canals be encased
where they pass through developments with lot
sizes of 2.3 acres or less; where subdivision
roads are constructed within 100 feet upslope
or upstream from canals; and within all
commercial, industrial, institutional, and
multi-family developments."

Based on the existence of downstream District treatment plant
facilities, our Regulations run parallel with this concept.

Thank you for providing us with the opportunity to review the
Draft EIR. Please contact me at 823-2466 if you have any
questions.

Sincerely,

NEVADA IRRIGATION DISTRICT



Ed Neuharth
Manager of Placer Administration

EN:aeb

C-12 Placer County Water Agency (01/05/94)

C-12-1. Various comments on *Draft Policy Document*

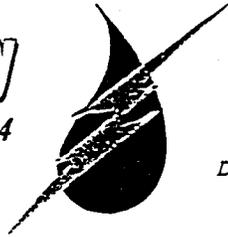
Comments noted; no response necessary.

Loren

F.Y.

Placer County Water Agency

185 Ferguson Rd. • P.O. Box 6570 • Auburn, California 95604
(916) 823-4850 800-464-0030 FAX (916) 823-4997



A Public Agency

BOARD OF DIRECTORS
R. G. Riolo • Walter Fickewirth
Otis Wollen • Richard Azevedo
E. W. Horton
David A. Breninger, General Manager

January 5, 1994
File No. General Information

PLACER
REC

JAN 11

Fred Yeager, Planning Director
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

PLANNING DEPT

SUBJECT: Placer County General Plan Update

Dear Mr. Yeager:

Thank you for the opportunity to review and comment on the Draft Policy Document and Draft Environmental Impact Report associated with the County General Plan Update process.

The Agency has the following comments regarding the Draft Policy Document:

C-12-1

Pg. 66, Policy 4.C.1. We would like to the use of the term "certification" in reference to the availability of water for future developments be replaced with the following wording:

"The County shall require a letter from the service provider stating that either water service is currently available or that needed improvements will be required prior to occupancy."

Pg. 66, Policy 4.C.2. Placer County Water Agency intends to develop a Groundwater Management Plan pursuant to California Water Code 10750, AB 3030. This plan will most likely include an evaluation of the groundwater situation in West Placer County that the State Department of Water Resources estimates is currently being overdrafted by about 55,000 acre-feet per year. Conjunctive use plans (combining surface and groundwater use) with the goal of decreasing total annual demand on the groundwater basin while at the same time increasing the utilization efficiency of the surface water treatment and distribution system in the County will no doubt be considered. The result could be an adopted plan that recommends new development be permitted utilizing groundwater as one source of supply.

We would like to see the General Plan modified to provide that all water served to new urban development be from surface sources unless it is groundwater that has been extracted pursuant to a Groundwater Management Plan that Placer County Water Agency has

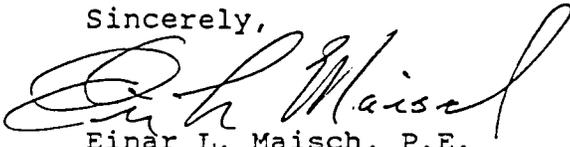
implemented pursuant to the provisions of California Water Code 10750. This would provide the flexibility to develop a Groundwater Management Plan which would meet everyone's interests in the future.

Pg. 68, Policy 4.D.8. Contamination of our canal system has become an important issue in recent years. We recommend the following wording following this policy: "These requirements and standards shall require that no on-site sewage treatment systems shall be allowed within 100 feet upslope of domestic water supply canals."

Pg. 70, Policy 4.E.17. The Agency has adopted development standards that specifically prohibit storm runoff from entering our water supplies. These standards require that residential developments adjacent to canals be required to encase the canal in pipe. We have found that encasement is an effective means of minimizing the quality and liability impacts on our water supplies and would like to see the words "wherever feasible" deleted from the first sentence of this policy.

Again, thank you for the opportunity to comment on these documents. Please call me if you have any questions regarding our comments.

Sincerely,


Einar L. Maisch, P.E.
Agency Engineer

pc: Board of Directors

January 5, 1994
c:\wp50\cor\jan94a

RECEIVED

JAN 19 1994

LAURENCE MINTIE
& ASSOCIATES

C-13 Sacramento Municipal Utility District (03/12/94)

C-13-1. Various comments on *Draft Policy Document*

Comments noted; no response necessary.



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1930, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

March 12, 1994

PLACER COUNTY
DATE
RECEIVED

ENV94-165

APR 18 1994

Loren Clark
Senior Planner
Placer County Planning Department
11414 B Avenue
Auburn, CA 95608

PLANNING DEPARTMENT

Comments on Draft EIR for Placer County General Plan

Dear Ms. Clark,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to review and comment on the Draft EIR for the Placer County General Plan. Based on our review the following comments are provided.

Paragraphs 4. A. 4 and 4.5 discuss the undergrounding of utility lines. SMUD's policy is to route underground those new utility lines that are less than 69 kilovolt (kV). Utility lines that are 69 kV or greater are routed overhead. SMUD would consider undergrounding lines that are 69 kV and greater as well as any existing overhead lines if the expense was paid by others.

C-13-1

Paragraph 4.4 discusses the requirement for developers to obtain "will-serve letters" from providers of public facilities. SMUD will provide such letters when requested.

Please ensure that the information provided above is conveyed to all interested parties. If you have questions regarding this letters, please contact me at (916) 732-6863.

Sincerely,

Michael L. Braun
Michael L. Braun
Environmental Specialist

File 421P
PLACER.DEIR

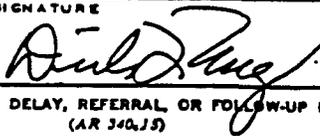
- cc: D. Oto MS 30
- W. Haycock MS 57
- K. Shorey MS 30
- P. Frost MS 30

D. State and Federal Agencies

D-1 U.S. Army Corps of Engineers (10/06/93)

D-1-1. *Draft Plan* will not conflict with any projects or programs within Army Corp's jurisdiction

Comment noted; no response necessary.

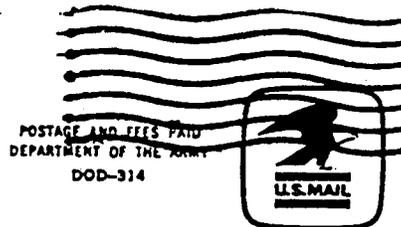
FROM: See return address on reverse.		DATE 6 Oct 93
WRITER'S NAME/TELEPHONE NO. Merritt Rice, Ch, Am Rvr/GB Branch 557-6758		
<input checked="" type="checkbox"/> YOUR <input type="checkbox"/> OUR COMMUNICATION (Kind, reference symbol, date, subject, or other identification) Draft Placer County General Plan and General Plan Environmental Impact Report (EIR)		
ACTION TAKEN OR REQUESTED <input type="checkbox"/> REPLY WILL BE FURNISHED ON OR ABOUT _____ <input checked="" type="checkbox"/> RECEIPT ACKNOWLEDGED <input type="checkbox"/> REQUEST DATE WHEN REPLY MAY BE EXPECTED <input type="checkbox"/> FOR DIRECT REPLY <input type="checkbox"/> WE HAVE SENT YOUR COMMUNICATION TO (See below) <input type="checkbox"/> TO OBTAIN INFORMATION We have reviewed the application, and the proposed project will not conflict with any project or other programs within our jurisdiction.		
<input checked="" type="checkbox"/> OTHER INFORMATION <input type="checkbox"/> SUPPLIED OR <input type="checkbox"/> REQUESTED Thank you for coordinating with us.		
TYPED NAME, GRADE, AND TITLE WALTER YEP Chief, Planning Division		SIGNATURE 

D-1-1

DA FORM 209, 1 Jan 70 REPLACES EDITION OF 1 NOV 66, WHICH WILL BE USED.

DELAY, REFERRAL, OR FOLLOW-UP NOTICE (AR 340.15)

DEPARTMENT OF THE ARMY - PM
 U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
 DEPARTMENT OF THE ARMY
 CORPS OF ENGINEERS
 1325 J STREET
 SACRAMENTO, CALIFORNIA 95814-2922



OFFICIAL BUSINESS
 PENALTY FOR PRIVATE USE, \$300

Placer County Planning Division
 11414 B Avenue
 Auburn, CA 95603

PLACER COUNTY
 DATE RECEIVED

OCT 08 1993

PLANNING DEPARTMENT

D-2 Calif. Dept. of Conservation--Govt. & Env. Relations (11/02/93)

D-2-1. Office supports mitigation policies cited in *Draft EIR*

Comment noted; no response necessary.

State of California

THE RESOURCES AGENCY OF CALIFORNIA

MEMORANDUM

To: Mr. Douglas P. Wheeler
Secretary for Resources

Date: November 2, 1993

Mr. Loren Clark ✓
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

PLACER COUNTY
DATE RECEIVED
NOV 05 1993

From: Department of Conservation
Office of Governmental and Environmental Relations

PLANNING DEPARTMENT

Subject: Draft Environmental Impact Report (DEIR) for the Placer
County General Plan Update. SCH #93082012

The Department of Conservation has reviewed the DEIR for the Placer County General Plan Update and the Policy Document for the General Plan. The information and data included for agricultural land use and agricultural commodities produced in Placer County is comprehensive. The loss of 59 percent of the annual gross production value of fruit and nut crops in the county was identified a potential result of development during the timeframe of the General Plan.

As stated in the General Plan DEIR, impacts could be modified by implementation of a number of policies, which are identified in the Policy Document. Among the policies identified, the Department especially supports development of a program to preserve and protect agricultural land through buffer zones, purchase and transfer of development rights, conservation easements and enforcement of the Right-to-Farm Ordinance.

D-2-1

The Department appreciates the opportunity to comment on the DEIR. If I can be of further assistance, please feel free to call me at (916) 445-8733.

Deborah L. Herrmann

Deborah L. Herrmann
Environmental Program Coordinator

cc: Kenneth E. Trott, Manager
Office of Land Conservation
Placer County Resource Conservation District

D-3 Department of Fish & Game (11/02/93)

- D-3-1. DFG strongly supports *Draft Plan* Implementation Program 6.10 (Habitat Management Plan) and supports swift and timely development of the program.

The Policy Document indicates that Implementation Program 6.10 will be initiated in 1995 and will take approximately 2 years to complete. Given the level of coordination and expenditure of resources necessary to implement the program, the County feels that this is a reasonable time frame.

- D-3-2. *Draft Plan* buffer policies must fully protect targeted resources, and should be adjusted only as vegetation and topography allow

The referenced policies have been modified for consistency throughout the Policy Document.

- D-3-3. Request for clarification of *Draft Plan* policy 6.A.1

The County is comfortable with the policy as drafted, given that this is a countywide document that provides for some County discretion.

- D-3-4. *Draft Plan* policy 6.B.4 should be mandatory component of new development proposals

Comment noted; no response necessary.

- D-3-5. DFG recommends additional policy recognizing value of agricultural land as foraging habitat

The Policy Document's policies and programs addressing agricultural land and habitat preservation implicitly recognize the habitat value of agricultural land.

- D-3-6. *Draft Plan* Policy 6.C.11 field review requirements should be expanded

The referenced policy has been modified in response to this comment.

- D-3-7. *Draft Plan* policy 6.C.12 list should be expanded

The suggested revision has been made to the Policy Document.

- D-3-8. *Draft Plan* Implementation Program 6.9 should not imply that importance of species is based on recreational or economic considerations

The County feels the program is appropriate as written.

- D-3-9. DFG reiterates its strong support of Program 6.10 (Habitat Management Plan)

Refer to response to comment D-3-1.

- D-3-10. *Draft Plan* policy 6.D.7 should emphasize native and endemic plant species

The County does not favor limiting landscaping in the manner suggested. As written, however, the policy provides staff with the discretion to require native or endemic species where appropriate.

D-3-11. DFG recommends development of a P/TDR program as a means to preserve and protect ecological areas

The County feels that the Policy Document covers the subject matter sufficiently.

DEPARTMENT OF FISH AND GAME

REGION 2
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CALIFORNIA 95670

(916) 355-7020

November 2, 1993

PLACER COUNTY
DATE RECEIVED

NOV 04 1993



PLANNING DEPARTMENT

Mr. Loren Clark, Senior Planner
Placer County Planning Department
11414 B Avenue
Auburn, California 95603

Dear Mr. Clark:

The Department of Fish and Game (DFG) has reviewed the Draft Policy Document and the Draft Environmental Impact Report (EIR) for the Countywide General Plan for the Placer County General Plan Update. We strongly support Implementation Program 6.10 which identifies the development of a comprehensive Habitat Management Plan (HMP) within Placer County. This process would assure protection of critical and representative habitats in Placer County and identifies a process by which development and wildlife mitigation can be routinely and easily accomplished. Swift and timely development of this program should be pursued by Placer County. Both natural resource and development interests can best be assured through this process. Clarification and expansion of this program should be included within future revisions of this document.

D-3-1

Additionally, we have the following specific comments at this time:

Draft Policy Document:

1. Page 20-21, #3 and page 87, policy 6.A.1.: Buffer widths and allowable uses within buffers must be designed to fully protect those resource values for which the buffer was established and adjusted only as vegetation and topography allow. Buffers must be adequately sized and configured, based on the best available biology, to assure that they function as intended. We typically suggest 100-foot nondevelopment buffers adjacent to perennial stream and wetland resources and 50-foot nondevelopment buffers adjacent to intermittent stream and wetland resources. However, more extensive nondevelopment and buffer areas may be required in areas of sensitive movement corridors, wildlife habitats, or stream systems. This standard should be modified to reflect the potential needs of the variety of resource values, as identified within the EIR, that may require protection from land development activities.

D-3-2

Mr. Loren Clark
November 2, 1993
Page Two

2. Page 87, policy 6.A.1.: Section "a" must be clearly defined and examples of potential exceptions identified. D-3-3
3. Page 91, policy 6.B.4.: This policy is critical to the entire concept of buffer width and protection of stream resources and should be a mandatory component of new development proposals. D-3-4
4. Page 92, goal 6.C.: Agricultural lands, principally lands under rice cultivation, provide a critical foraging and resting habitat for migratory waterfowl. We recommend that a policy be developed that describes the critical nature of rice land to waterfowl, develops criteria by which protection of these agricultural lands is considered, and develops a methodology to mitigate for the unavoidable loss of rice land values. D-3-5
5. Page 93, policy 6.C.11.: Evaluation for DFG "Species of Concern" should be added to required field review of projects within significant areas. Additionally, those types of habitats that may be considered as "significant ecological resource areas" as noted within this policy should be identified and include wetlands, vernal pools, all stream environment zones, all water bodies, migratory deer ranges, known locations of rare, threatened and endangered species of plants and animals and their suitable habitats, agricultural areas critical as migratory waterfowl wintering habitat, large blocks of undeveloped habitat, and connective links to large blocks of habitat. D-3-6
6. Page 93, policy 6.C.12.: Species of concern and important movement zones should be added to this list. D-3-7
7. Page 94, Implementation Program 6.9, second sentence: The importance of any species should not be based on relevant recreational or economic considerations, and this sentence should be modified to reflect this recommendation. The DFG, as Trustee Agency for fish and wildlife, will provide relevant ecological criteria and the determination of the importance of a species habitat. D-3-8
8. Page 94, Implementation Program 6.10.: We consider this program the most critical program for fish and wildlife in this General Plan and support swift implementation. We are concerned that phasing of this program, as currently identified within this General Plan, will preclude the ability of Placer County to incorporate a Habitat Management Program (HMP) during the selection of those New Growth Areas as identified within this document. An HMP D-3-9

Mr. Loren Clark
November 2, 1993
Page Three

should be identified as a concurrent process of this General Plan Update. This HMP should also be identified within the "Standards for New Growth Areas" on page 23-24 as a principal component for the identification of areas constrained to development due to the presence of significant ecological resources and those in need of future protection.

The DFG is willing to assist Placer County with the development of an HMP in a timely and useful manner. We are concerned that funding may not be available and suggest that the program be given a high priority for timely implementation and a firm funding source identified within these documents. Without the development of an HMP, principally within western Placer County, continued, irretrievable loss of critical wildlife and plant resources will occur.

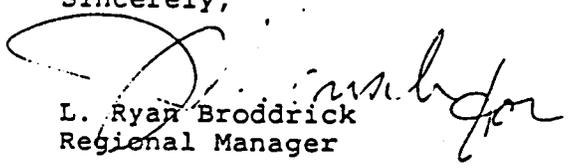
9. Page 96, policy 6.D.7.: This policy should emphasize the use of native and endemic plant species.
10. We recommend that a policy be developed, similar to policy 7.4 on page 105 for agricultural lands, that identifies the development of a program for the purchase and transfer of development rights as a means to preserve and protect significant ecological areas.

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

This project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.

If the DFG can be of further assistance, please contact Mr. Ron Bertram, Senior Biologist, at (916) 355-7010 or Mr. Jerry Mensch, Environmental Services Supervisor, at (916) 355-7030.

Sincerely,


L. Ryan Broddrick
Regional Manager

cc: See attached list

D-3-9

D-3-10

D-3-11

cc: Mr. Ron Bertram
Department of Fish and Game
Rancho Cordova, California

Mr. Jerry Mensch
Department of Fish and Game
Rancho Cordova, California

D-4 California Regional Water Quality Control Board--Lahontan (11/10/93)

D-4-1. Commentor did not receive Draft Policy Document

Comment noted; no response necessary.

D-4-2. Final EIR should include commitment to preparation of subsequent environmental documents as needed

The County does intend to use the General Plan EIR as a first-tier document for subsequent environmental analyses, although the Policy Document does specify that major new development projects will be required to prepare project-level environmental documents.

D-4-3. Draft EIR Tables 2-3 and 2-7 appear to contain discrepancies

The numbers in Table 2-3 reflect holding capacity, while the numbers in Table 2-7 reflect forecast-based development at year 2040.

D-4-4. Final EIR should recognize potential water quality impacts of roadway widenings

The Policy Document includes policies to address potential effects of public works projects, including road widenings, on the quality of local water courses. The EIR also recognizes this potential impact.

D-4-5. Draft EIR cites Lake Tahoe Basin Water Quality Plan that was not adopted

The cited references to the Lake Tahoe Basin Water Quality Plan have been removed from the Final EIR. The water-use limitation citations now refer to the California-Nevada Interstate Water Compact.

D-4-6. Final EIR should recognize California-Nevada Interstate Water Compact limitations on diversions from Truckee River watershed

The Final EIR cites the limitations on surface water diversions in the Truckee River watershed.

D-4-7. Tahoe-Truckee Sanitation Agency's wastewater treatment capacity limit is actual limit for entire Tahoe Basin

The County understands this; the capacities listed in Table 5-2 are for those Placer County users of TTSA facilities (see footnote #1).

D-4-8. Draft EIR assumes no new onsite systems in Lake Tahoe and Truckee River watersheds; in actuality, some exceptions are allowed

The Final EIR corrects the implication that restrictions on on-site systems are absolute.

D-4-9. Draft EIR assumes that all development in Placer County part of Martis Valley is sewered; this is not the case

The Final EIR recognizes that there are some onsite sewage treatment systems in the Placer County part of Martis Valley.

- D-4-10. *Draft EIR* should state that prohibition of wastewater disposal in Tahoe Basin is stated in the Porter-Cologne Water Quality Control Act.

This reference has been corrected in the Final EIR.

- D-4-11. *Draft EIR* should note that Lahontan's prohibition of wastewater disposal in Tahoe Basin applies in part of Placer East area

The Final EIR notes that Lahontan's discharge regulations operate in the parts of the Placer East analysis area under its jurisdiction.

- D-4-12. Final EIR should use TRPA's assumptions for impervious surfaces; should also recognize water quality effects of drainage improvements

The County recognizes that different agencies may have more precise information available than the standard assumptions used in the EIR analysis. In assessing the relative impacts of increased development, the County feels it is appropriate to use standard assumptions, particularly for a countywide general plan EIR. Accordingly, the Final EIR does not reflect the recommended changes. The water quality effects of increased impervious surface are discussed both in Chapters 5 and 8 of the Final EIR.

- D-4-13. Final EIR should state that statewide NPDES permits are issued by SWRCB, not Regional Boards

The reference is corrected in the Final EIR.

- D-4-14. *Draft EIR* Table 8-1 should recognize growth potential in Tahoe Basin outside of Tahoe City Community Plan Area

Table 8-1 is based on TRPA assumptions for new growth in the Tahoe Basin; for the Placer County part of the Basin, most of the growth is in the Tahoe City Community Plan Area.

- D-4-15. Does *Draft EIR* assume cumulative surface water quality impacts are mitigated or unmitigable

The same policies and programs addressing local water quality problems also address the cumulative regional problems, but only in areas within Placer County's jurisdiction. The County is not in a position to impose mitigation requirements (or its General Plan policies) outside of the county. The cumulative impact discussion is intended to disclose potential regional problems that might result from development within and outside of Placer County.

- D-4-16. Two corrections to *Draft EIR* Table 8-7

The Background Report has been revised to include updated lists of both federally- and state-listed species occurring in Placer County. Draft EIR Table 8-7 has been included in the Background Report.

- D-4-17. *Draft EIR* use of "Significant Natural Areas" should be clarified

The term "significant natural areas" is described in the Background Report as it relates to a program administered by the Department of Fish and Game. The types of natural areas that the County considers significant are defined in the Policy Document.

D-4-18. Final EIR should recognize Tahoe Basin concerns with water quality impacts of atmospheric air pollutants

The increase in nitrogen oxides (NOx) has been reevaluated in the Final EIR and is now predicted to increase 38.5 percent between 1991 and 2010. This significant increase in NOx is expected to occur predominantly in the Sacramento Valley Air Basin. Although increased NOx concentrations may be transported through the Mountain Counties air basin and into the Lake Tahoe air basin, significant deposition into Lake Tahoe is not anticipated from this source. The County, nonetheless recognizes this concern.

State of California

Memorandum

To : William Shafroth
Resources Agency
1416 Ninth Street
Sacramento, CA 95814
Attention: Nadell Gayou

Date: November 10, 1993

Ranjit S. Gill
Ranjit S. Gill, Ph.D., Chief, Planning and Toxics Section

From : California Regional Water Quality Control Board
Lahontan Region
2092 Lake Tahoe Boulevard, Suite 2
South Lake Tahoe, California 96150
(916) 544-3481 FAX (916) 544-2271

PLACER
RE
NOV
PLANNING DEPARTMENT

Subject: REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT, PLACER COUNTY
GENERAL PLAN UPDATE, SCH # 93082012

Regional Board staff have reviewed the draft Environmental Impact Report (EIR) for Placer County's General Plan Update. As described in the Introduction, the County proposes to satisfy California Environmental Quality Act (CEQA) requirements by using four separate documents: the Draft Countywide General Plan Policy Document; the Draft General Plan Background Report, the General Plan Issues and Options Report, and this draft EIR, which includes a technical appendix volume. Regional Board staff have submitted separate comments on the Issues and Options Report and the Background Report; we assume that these comments will be addressed when final version of these documents are prepared. We did not receive a copy of the Draft Countywide Plan Policy Document.

The preferred General Plan Alternative is a "hybrid" of alternatives discussed in the Issues and Options Report. It involves a Countywide population increase to 500,000 by 2040, with most growth concentrated in the western portion of the County. The update process would involve "validation", with limited modifications, of a number of existing community plans, including the Alpine Meadows, Lake Tahoe, North Tahoe, Ward Valley, Martis Valley, and Squaw Valley General Plans. The EIR is meant to be a "program EIR" and a Master Environmental Assessment. Several significant unmitigable impacts are identified including loss of fish and wildlife habitat and vegetation due to urbanization, and increases in nitrogen oxide emissions (see Specific Comment 16 below).

The Regional Board will not be issuing any permits as a direct result of Placer County's adoption of an updated General Plan. Only the eastern portion of Placer County, in the Lake Tahoe and Truckee River watersheds, are within the Lahontan Regional Board's jurisdiction. We have the following comments as a "trustee agency" under CEQA for the waters within those watersheds.

General Comments

- 1. The EIR cites proposed General Plan Policies as mitigation for many potential impacts, and provides brief summaries. Because we did not receive the full text of the policies, we cannot fully evaluate the adequacy of mitigation for water quality-related impacts.
- 2. The EIR's discussions of water quality-related impacts are very general, and are not adequate for our use as a CEQA responsible agency for any subsequent specific projects. We assume that the County does not intend to use this EIR as a "Master EIR" pursuant to recent CEQA amendments. The final EIR should include a commitment to prepare subsequent environmental documents as needed.

D-4-1

D-4-2

Specific Comments

- 1. The potential numbers of dwelling units in Table 2-3 (34, 822 units at the maximum density) do not agree with the projections discussed on page 3-6 of the text or the year 2040 "Total Units" in Table 2-7. Table 2-7 apparently includes both existing and future units. These discrepancies should be corrected, since they may affect water-related impacts such as needs for sewer capacity, water supply, and stormwater control facilities.
- 2. On page 4-39, the widening of Highways 28 and 89 from two to four lanes is recognized as possible mitigation for increased traffic impacts. The final EIR should recognize the potentially significant water quality impacts, associated with erosion and increased impervious surface, of widening these highways, which are located near Lake Tahoe and the Truckee River.
- 3. The discussion of domestic water supply projections on page 5-6 cites proposed "zonal" allocations of water in the Lake Tahoe Basin discussed in the 1980 Lake Tahoe Basin Water Quality Plan. Although the State Water Resources Control Board circulated a draft EIR on this proposed allocation scheme in 1984, the EIR was never finalized, and the allocation policy was never approved.
- 4. In addition to the 23,000 acre-feet per annum (afa) cap on water use in the Lake Tahoe Basin, the California-Nevada Interstate Water Compact (P.L. 101-618) limits maximum surface water diversions in the Truckee River watershed in California [which includes portions of Placer, Nevada, and Sierra Counties] to 10,000 afa. This limit should be recognized in the final EIR's discussion of projected future water use.

D-4-3

D-4-4

D-4-5

D-4-6

5. (page 5-17) The Tahoe-Truckee Sanitation Agency's (TTSA's) wastewater treatment capacity limit is the actual capacity limit for the Squaw Valley County Water District, Alpine Springs County Water District, Truckee Sanitary District, and Northstar Community Services District systems as well as for the districts in the Tahoe Basin. D-4-7
6. (page 5-17) The EIR assumes that no new development using onsite wastewater treatment systems (septic systems) will occur in the Lake Tahoe and Truckee River watersheds due to the Regional Board's septic system discharge prohibitions. Limited exemptions to these prohibitions are permitted if the Regional Board makes certain findings. Also, the Truckee River prohibitions apply only to the area upstream of the Boca Reservoir outlet; regionwide septic system criteria, including a 2 dwelling units per acre density limit, apply to downstream areas. The prohibition language has been clarified in the revised Water Quality Control Plan for the Lahontan Region, which was adopted by the Regional Board in September 1993. This plan could take effect in early 1994, following further necessary state agency approvals. D-4-8
7. The EIR assumes (page 5-23) that all development in the Placer County portion of Martis Valley has been sewered. This is not the case; exemptions for the use of onsite systems have been granted for several subdivisions. D-4-9
8. The prohibition against wastewater disposal in the Lake Tahoe Basin is not contained in the California-Nevada Interstate Water Compact, as stated on page 5-23, but in the Porter-Cologne Water Quality Control Act. D-4-10
9. The Lahontan Regional Board's waste discharge prohibitions affecting onsite systems (and exemption criteria) apply in the portion of the "Placer East" planning area within the Truckee River Watershed and upstream of the Boca Reservoir outlet (page 5-29). D-4-11
10. Impervious surface coverage figures for the Lake Tahoe Basin (Table 5-8, page 43) have apparently been estimated, as for the rest of the County, using assumptions about the average amount of coverage associated with different land uses. The Tahoe Regional Planning Agency (TRPA) has more accurate figures for existing and projected coverage within the Tahoe Basin. The EIR's discussion of drainage, which now centers on flood control, should also recognize the water quality impacts of increased coverage in terms of decreased soil/vegetation treatment for nutrients in precipitation, and addition of urban stormwater pollutants to runoff. D-4-12
11. (page 8-1) Statewide stormwater NPDES permits are issued by the State Water Resources Control Board, not the Regional Boards. D-4-13
12. Table 8-1 on page 8-4 needs to recognize the potential for growth in the Lake Tahoe Basin outside of the Tahoe City Community Plan Area. D-4-14

- 13. On page 8-6, the potential for cumulative reduction of surface water quality in the Truckee River watershed is recognized after the discussion of mitigation of direct impacts to surface water quality. Are cumulative impacts assumed to be mitigated by the same measures noted for other water quality impacts, or are they unmitigable? D-4-15
- 14. On page 8-23 (Table 8-7), the Lake Tahoe shorezone plant Tahoe yellow-cress (Rorippa subumbellata) is listed as a "candidate species"; the footnote explains that this is in relation to federal listing. Tahoe yellow cress is also a State-listed endangered species. Table 8-7 should also include the recently listed federal candidate species Carpina lacustris, the Tahoe benthic stonefly. D-4-16
- 15. Page 8-29 lists several "Significant Natural Areas", including Martis Creek as a Lahontan cutthroat trout stream, and Ward Creek as Tahoe yellow cress habitat. It is not clear whether the term "Significant Natural Area" is used in the same sense as that of the California Department of Fish and Game's (DFG's) Natural Heritage Program. A 1992 annual summary printout from this program provided to us by DFG shows Tahoe yellow-cress habitat at the mouth of Blackwood Creek as well as at the mouth of Ward Creek. A Truckee River tributary, Pole Creek, is identified in our current Basin Plan as habitat for Lahontan cutthroat trout. The Truckee River and all tributaries have been designated for an existing or potential Rare and Endangered Species Habitat (RARE) beneficial use in recognition of federal plans to reintroduce the Lahontan cutthroat trout. D-4-17
- 16. The discussion of air quality impacts (pages 8-37 and 8-39) projects a 24% increase in nitrogen oxide generation in Placer County between 1991 and 2010. This increase is considered significant and unmitigable. The final EIR needs to recognize the concern within the Lake Tahoe Basin about the water quality impacts of atmospheric deposition of nitrogen oxides from out-of-Basin sources, and the possibility that this increase could contribute to nonattainment of TRPA's "environmental threshold" standards related to atmospheric nutrient loading. TRPA has a variety of contingency measures, including further restrictions on development, which may be triggered by lack of progress toward attainment of thresholds. D-4-18

Please contact Judith Unsicker at (916) 542-5417 if you wish to discuss these comments.

cc: Regional Board Members
 Region 5, Sacramento Office
 Tahoe Regional Planning Agency
 Loren Clark, Placer County Planning Department ✓

JEU/sh

D-5 Caltrans (11/18/93)

D-5-1. Development of high occupancy vehicle (HOV) lanes would address most impacts on I-80 identified in *Draft EIR*

Comment noted. The EIR does mention HOV lanes as a possible mitigation measure for traffic on I-80 and the Policy Document calls for the County to participate in a multi-modal study of the I-80 corridor that will include consideration of HOV facilities.

D-5-2. HOV lanes on I-80 are not included in RTP project list; County should ensure that they are added

The Policy Document includes a policy calling for PCTC to add HOV facilities and ramp metering to its 20-year RTP.

D-5-3. Recommended first step in HOV lane program is installation of ramp metering

The I-80 multi-modal study that the Policy Document calls for Placer County to participate in will address HOV lanes, but the General Plan is not the appropriate forum for discussion of these details.

DEPARTMENT OF TRANSPORTATION



DISTRICT 3
P. O. BOX 911
MARYSVILLE, CA 95901
TDD 916 741-4509
FAX no. 916 323-7669
Telephone 916 741-4277

November 18, 1993

PLACER COUNTY
DATE RECEIVED

EPLA085
03-Pla-Var
DEIR
Placer County General Plan

NOV 22 1993

PLANNING DEPARTMENT

Loren Clark
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

Dear Mr. Clark:

Thank you for the opportunity to review and comment on the above referenced document.

COMMENTS:

- The DEIR accurately notes that "the backbone of the county's roadway system is its state highways, particularly Interstate Route 80 which traverses the county from east to west." Interstate 80 is also the only East-West major freeway between Bakersfield and Portland, a distance of about 1,000 miles. As such, it is of enormous national economic importance with regard to freight traffic. Delays on Interstate 80 will have significant negative national economic consequences.
- The DEIR analysis of the impacts to Interstate 80 with and without improvements dramatically illustrates the need for enhancements to the route. The improvement assumed in the DEIR, and probably the most efficient and effective alternative, would be the development of high occupancy vehicle (HOV) lanes between Sierra College Boulevard and the Sacramento County line, with connections to HOV lanes from this point westward in Sacramento County. This would address the growth assumed and accommodated in the General Plan Update.
- The development of HOV lanes in this corridor, however, are not included in the draft Placer County Transportation Commission 1993 Regional Transportation Plan (RTP) 20 year project list which assumes a constrained (realistic) funding scenario. The County should ensure that the project is, in fact, included in this listing as a high priority project consistent with the conclusions of the environmental assessment for the new General Plan.
- The implementation of a comprehensive ramp metering program at appropriate locations within Placer County is recommended as a first step toward the eventual HOV lane project described above. The ramp metering program is of relatively low cost, could be implemented in a timely manner commensurate with the projected growth, and would provide ample incentive for Placer commuters to rideshare. The program is being implemented within Sacramento. Caltrans is developing a preliminary cost estimate for

D-5-1

D-5-2

D-5-3

Mr. Loren Clark
November 18, 1993
Page 2

the proposed ramp metering network. This information will be forwarded to you as soon as it is available. D-5-3

If you have any questions, please phone me at 741-4227 or Jeff Pulverman in Sacramento at 327-3859.

Sincerely,



JEL

JODY E. LONERGAN
Deputy District Director
Planning and Public Transportation

D-6 Calif. Dept. of Conservation--Div. of Mines & Geology (11/24/93)

D-6-1. *Draft Plan* appears well-conceived and sufficiently complete, especially policies dealing with fire hazards

Comment noted; no response necessary.

D-6-2. Recommended revision to *Draft Plan* policy 8.A.1

Comment noted, but no change has been made. The County retains discretion regarding the appropriate content of such analysis.

DEPARTMENT OF CONSERVATION
 DIVISION OF MINES AND GEOLOGY
 ENVIRONMENTAL REVIEW PROJECT
 801 K Street, MS 12-32
 Sacramento, CA 95814-3531
 Phone (916) 323-8567
 Fax (916) 324-1396

PLACER COUNTY
 DATE RECEIVED



DEC 01 1993

PLANNING DEPARTMENT

November 24, 1993

Mr. Loren Clark
 Placer County Planning Department
 11414 B Avenue
 Auburn, Ca 95603

Dear Mr. Clark:

Subject: Health and Safety Element Review for the Placer County
 General Plan Update Project

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the draft Health and Safety Element and portions of the DEIR and related documents for the General Plan Update. DMG has special expertise in evaluating geologic/seismic hazards and resource issues, and has responsibility under Government Code Section 65302(g) to review and provide information to the lead agency for the Draft Safety Element portion of the General Plan prior to its adoption. The documents reviewed are:

- Countywide Draft Health and Safety Element Policy Document, October 1, 1993.
- Countywide General Plan DEIR. October 1, 1993 (SCH# 93082012).
- Draft General Plan Background Report, Volume I and II, September 25, 1992.

Those portions of the Draft Policy Document that we reviewed appear to be well conceived and sufficiently complete, especially the policies dealing with Fire Hazards. DMG has a minor suggestion regarding the geologic hazard section of the Health and Safety Element. D-6-1

Policy 8.A.1, requires "a soils engineering and geologic-seismic analysis" in areas prone to specified geologic hazards. We suggest using the term "and/or" to allow the option of one or the other analysis. For example, a potential expansive soil problem can be adequately evaluated by a soils engineering analysis; and groundshaking may be adequately evaluated by a geologic/seismic analysis. But both types of analysis may be required to evaluate a difficult liquefaction problem. D-6-2

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DEC 3 1993

Mr. Loren Clark
November 24, 1993
Page Two

DMG complements the Placer County Planning staff and their consultants in producing an informative and well presented Background Report for the General Plan Update.

If you have any questions regarding these comments, please contact me at (916) 322-2562.

Sincerely,

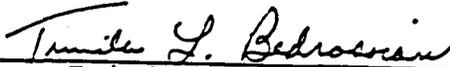


Roger C. Martin
Senior Engineering Geologist
Environmental Review Project Manager
RG 2421, CEG 705

Concur:

11-24-93

Date:



Trinda L. Bedrossian
Supervising Geologist
RG 3363, CEG 1064

cc: Deborah Herrmann, Department of Conservation

E. Environmental Organizations

E-1 California Native Plant Society (11/03/93)

- E-1-1. County should uphold 1-mile urban separator buffer requirements, but should exclude any residential development in buffer areas

Because the new growth areas that would have required the Draft Plan's urban separator buffer no longer appear on the Land Use Diagram, the standards for such buffers have been removed from the Policy Document. The County agrees that vernal pool areas should be protected; accordingly, the Policy Document includes policies and programs that would prohibit the disturbance of valuable vernal pool habitat.

- E-1-2. Policies calling for planting of vegetation should specify preference for indigenous species or species likely to hybridize with native species

The Policy Document incorporates the recommended revision.

- E-1-3. CNPS disagrees that no additional mitigation is feasible for impacts on native plants and plant communities (cite first 2 comments)

The County does not believe that these impacts could be further mitigated without changing the fundamental nature of the proposed project. Refer to common response #2.

- E-1-4. CNPS supports policies encouraging on-site stormwater retention in new development

Comment noted; no response required.

- E-1-5. CNPS recommends that *Draft Plan* Policies 6.A.1, 6.A.5, and 6.B.3 be strengthened

The County feels the referenced policies are appropriate for a countywide general plan.

- E-1-6. CNPS suggests that replacement of lost riparian vegetation (per policy 6.A.3.a) might be infeasible; avoidance should be first priority

Policy 6.A.3 has been revised to indicate that avoidance of riparian habitat will be the first priority, but that creation of new habitat will be an acceptable alternative in cases where avoidance is infeasible.

- E-1-7. CNPS recommends ranking mitigation methods in Policy 6.B.2 in order of priority

Policy 6.B.2 has been modified to rank the methods in the suggested order.

- E-1-8. Policy 6.D.2 should clarify that "native" species are "indigenous"

The County does not feel the recommended change is necessary.

- E-1-9. Policy 6.D.4 should be expanded to include recruitment of younger trees

Policy 6.D.4 has been revised to encourage recruitment and retention of younger trees.

- E-1-10. CNPS recommends preparing a masterplan for rare plant communities and significant natural areas

The County feels that the Policy Document adequately addresses the intent of this recommendation, so the recommended change has not been made.

- E-1-11. Plan policies should explicitly recognize northern volcanic mudflow vernal pools and other types of vernal pools

The Policy Document's references to vernal pools are implicitly inclusive of all types of vernal pools.

- E-1-12. Policy 6.E.4 in the *Draft Policy Document* is too vague and general

Comment noted; no change has been made.

- E-1-13. CNPS disagrees that no additional mitigation is feasible for impacts related to habitat conversion (cite first 2 comments)

Refer to response to comment E-1-1.

- E-1-14. CNPS encourages Placer County to provide copies of CEQA-required documents to nonprofit organizations free of charge

The County is not in a financial position to subsidize reproduction costs, even for nonprofits.

California Native Plant Society

1722 J Street, Suite 17
Sacramento, California 95814

Placer County Planning Department
11212 B Avenue
Auburn, California 95603

PLACER COUNTY
DATE RECEIVED
November 3, 1993

NOV 1 1993

PLANNING DEPARTMENT

SUBJECT: Draft Environmental Impact Report for the Placer County General Plan Update (SCH# 93082012)

Gentlemen:

The California Native Plant Society (CNPS) appreciates the opportunity of reviewing the above Draft Environmental Impact Report (DEIR). However, we feel that some additional measures need to be taken to protect and preserve the native plants and plant communities of Placer County. Since the proposed mitigation measures for most of the potential environmental impacts identified in the DEIR consist of policies and implementation programs outlined in the Draft Countywide General Plan Policy Document, many of the following comments address proposed policies and programs. We suggest that if it is not appropriate or feasible to modify some of proposed policies and programs, then perhaps additional mitigation measures for certain impacts need to be included in the Final EIR.

1. Page 1-6: We note that the primary objectives for land use planning adopted by the Placer County Board of Supervisors (Project Objectives 1-5) include balancing growth by separating and individualizing population centers. However, in south Placer County, separation between adjacent communities is rapidly disappearing; development of the four "new town" areas, one of which (Stanford Ranch West, per page 3-2 of the DEIR) already overlaps with Roseville's sphere of influence, will only exacerbate the situation. The DEIR correctly identifies northern volcanic mudflow vernal pools in the Roseville area and several other plant communities and native plant species as especially threatened by development in Placer County. The Draft Countywide General Plan Policy Document calls for urban separator buffers that are at least 5,280 feet wide. We urge you to uphold the buffer requirement throughout south Placer County and, wherever possible, to align the buffers in a manner that will preserve south Placer County's rapidly diminishing vernal pools, riparian habitat, and oak woodlands.

Furthermore, the Draft Countywide General Plan Policy Document indicates that compatible land uses in urban separator buffers include "ranchette-type residential development and other low-intensity uses with minimum-lot-area requirements ranging from one acre (for clustered developments) to 20 acres" (Draft Countywide General Plan Policy Document, page 22). We do not feel that 1-20 acre lots are compatible with the natural appearance and function of the grasslands, vernal pool areas, and oak savannah that characterize much of south Placer County and recommend deleting any new residential development from the list of allowed land used in urban separator buffers. However, if

E-1-1



Dedicated to the preservation of California native flora

despite CNPS's recommendation, some development is allowed to occur in or near any vernal pool areas lying within an urban separator buffer, then it is imperative that the natural hydrology of the areas to be developed and of the vernal pool watershed be determined before any projects are approved to ascertain that there will not be any indirect adverse effects on vernal pools.

E-1-1

2. Page 3-5, Visual and Scenic Resources: We recommend revising Policies 1.J.2, 1.J.3, and 1.J.6 to clarify that "vegetation" used for screening new development shall refer to trees and/or shrubs indigenous to the general project locality whenever possible; furthermore, species native to the type of soil found on the project site should be used. If species not native to the general project locality must be used, only species that are not likely to hybridize with the local flora should be planted. In addition, please modify Policy 1.J.4.d. to encourage:

E-1-2

- a. use of native grasses and forbs to revegetate graded areas.
- b. stripping and stockpiling of native topsoil prior to grading the subsoil, and redeposition of the stockpiled soil prior to revegetation.

Reference is made on page 3-5 of the DEIR to "Policies 1.J.1. through 1.J.8." Our copy of the Draft Countywide General Plan Policy Document did not include Policies 1.J.7. or 1.J.8.

3. Page 3-6: We disagree that no additional mitigation is feasible for land use impacts on native plants and plant communities. Please see comments 1 and 2 above.

E-1-3

4. Section 5.3, Drainage: Since the health and survival of many native plants and plant communities depend on maintenance of natural hydrological conditions, we support on-site infiltration of additional storm runoff generated by new development whenever possible. Perhaps Policies 4.E.11. and 4.E.12. could be modified to encourage more strongly on-site stormwater retention and to maximize opportunities for groundwater recharge.

E-1-4

5. Page 8-5, Surface Water Quality: Agriculture, industrial land uses, and residential landscaping can all be sources of pesticides, fertilizers, and other chemicals. These substances may be carried by overland sheet flow or shallow subsurface flows into adjacent sensitive native plant communities, such as vernal pools or riparian habitats. We recommend that exceptions to Policy 6.A.1. be kept to a minimum and that when exceptions are granted, appropriate mitigation measures and/or implementation of best management practices (BMPs) be required. Furthermore, the BMPs selected for the project should alter that natural hydrology of the sensitive habitat as little as possible; that is, efforts should be directed not to diverting potentially contaminated water from a sensitive plant community but rather to ensuring adequate water quality. We suggest modifying Policies 6.A.1. and 6.B.3. accordingly.

E-1-5

We also recommend expanding Policy 6.A.5. to require the use of BMPs not only to protect streams but native plant communities such as vernal pools and riparian areas as well.

6. Page 8-31, Streams and Creeks: The intent of Policy 6.A.3.a, encouraging on-site, in-kind replacement of riparian vegetation lost due to development, is commendable. However,

E-1-6

it should be recognized that in many cases, especially on relatively undisturbed sites, existing riparian vegetation already occupies all areas capable of supporting such vegetation. Thus, attempts to plant new riparian vegetation in other portions of the site may prove unsuccessful unless the hydrology of the areas to be planted is modified so that it will support riparian vegetation. Modification of hydrology to support a different type of vegetation than what occurs naturally on a given site tends to be expensive, requiring monitoring for five years or more. In short, avoidance of riparian vegetation should be the policy of first choice unless there is clear evidence that other portions of the site are suitable riparian habitat.

E-1-6

7. Page 8-31, Streams and Creeks: We strongly recommend ranking the mitigation methods for impacts on wetlands that are listed in Policy 6.B.2. in order of preference, with avoidance being the preferred policy. This ranking is also supported by the U.S. Army Corps of Engineers and Environmental Protection Agency Memorandum of Agreement on Section 404(b)(1) of the Clean Water Act.

E-1-7

We commend Placer County's awareness, as implied by Policy 6.B.2., that losses of non-regulated wetlands can be cumulatively significant and fully support the goal of "no net loss" of wetlands of any kind.

8. Page 8-31, Vegetation:

- a. Please modify Policy 6.D.2 to clarify that "native" species should be indigenous to the general project vicinity and to the types of soil found on the project site, and that "compatible non-native species" should be carefully selected so that no inadvertent hybridization with local species is likely to occur.
- b. We recommend modifying Policy 6.D.4. to include not only landmark trees and "major" groves (What constitutes a "major" grove?) of native trees but also a reasonable number of younger trees, along with adequate space for the younger trees to mature, that will serve to maintain a biologically viable population as the older trees decline and die. Many local tree preservation ordinances in California omit to provide for recruitment of new native trees; we encourage you to take advantage of this opportunity to avoid setting up a "museum" of relict, aging native trees.

E-1-8

E-1-9

9. Page 8-32, Open Space for the Preservation of Natural Resources:

- a. Policies 6.E.1 through 6.E.5 are somewhat vague regarding the timing of their implementation; they should be revised to provide a more proactive approach to conservation issues. Protection of significant natural communities should not occur in a piecemeal fashion as development proposals are submitted. We strongly recommend that Placer County go beyond "coordinat[ing] with local, state, and federal agencies and private organizations to establish ... open space areas" (Policy 6.E.5) and develop a masterplan for the County's rare plant communities and significant natural areas; please add an implementation program calling for such a masterplan. The masterplan should identify specific sites to be preserved together with adequate buffer zones around each preserve. Although the Draft Countywide General Plan Policy Document (page

E-1-10

20) calls for a minimum buffer width of 50 feet, with an average width of 100 feet, a wider buffer may be required in certain instances; the master plan should evaluate buffer requirements on a case-by-case basis. Given the development pressure currently being exerted on the vernal pool areas of south Placer County, we suggest developing and adopting such the masterplan in several phases on the basis of geographical location, with south Placer County constituting the first phase. Foothill and montane habitats could then be addressed in subsequent phases.

E-1-10

b. We recommend explicitly including northern volcanic mudflow vernal pools and other types of vernal pools in Policies 6.E.1 and 6.E.2.

E-1-11

c. Please clarify the intent of Policy 6.E.4. As written, it seems so vague and general as to be meaningless.

E-1-12

10. Page 8-34, Mitigation Measures: As noted above, we disagree that no further mitigation measures are feasible for habitat conversion in new growth areas and potential habitat conversion in suburban and rural residential areas.

E-1-13

Lastly, according to page 1 of the DEIR, the issues which CEQA requires to be addressed in a DEIR are covered by four volumes: the Draft Countywide General Plan Policy Document, the Draft General Plan Background Report, the General Plan Issues and Options Report, and the DEIR. Unfortunately, budget constraints allowed us to purchase only the Draft Countywide General Plan Policy Document and the DEIR; some of our concerns may have been addressed in the other two volumes. We realize that Placer County, like other public agencies, has a limited budget. Nonetheless, CNPS would like to encourage the Placer County Planning Department to revise its fee policies so that non-profit organizations can obtain documents required by CEQA free of charge.

E-1-14

Yours sincerely,

Eva Begley, Ph.D.
Conservation Committee, Sacramento Valley
Chapter, CNPS

cc:
Ray Butler, CNPS
George Clark, CNPS
Karen Wiese, CNPS
Roland Berghold, Sierra College
Neila Stewart, Planning Department, City of Roseville
Monica Parisi, California Department of Fish and Game
Jim Browning, U.S. Fish and Wildlife Service

E-2 Sierra Club (11/13/93)

E-2-1. *Draft EIR* statement of project objectives is inconsistent with *Draft Plan*

The EIR's project objectives summary has been modified, as has the nature of the project; the County feels that, with these changes, the two are consistent.

E-2-2. EIR should isolate impacts associated with new growth areas

While the County concedes that such an analysis might be informative, it does not feel it is necessary for the EIR to isolate the potential impacts of development in the new growth areas. According to the Policy Document, development in the new growth areas will proceed according to the provisions of specific plans that will require a detailed analysis of potential impacts. Furthermore, the new growth areas that were the cause of the greatest impacts no longer appear on the Land Use Diagram. See also common response #11.

E-2-3. *Draft Plan* and *Draft EIR* holding capacity tables differ from one another

The tables have been revised to reconcile the cited inconsistencies.

E-2-4. *Draft Plan* would be inconsistent with Dry Creek-West Placer Community Plan (DCWPCP), so DCWPCP would have to be amended

The County understands that the provisions of the Policy Document would require modification of the Dry Creek-West Placer Community Plan, and such revisions will be made in conjunction with adoption of the Countywide General Plan. The County does not, however, agree that the EIR for that plan would have to be revised, since the modifications to the plan would require the preparation of a specific plan and EIR for any new development in the Villages of Dry Creek area and because the Draft EIR addressed the Villages of Dry Creek area at level of detail appropriate for a general plan.

E-2-5. *Draft EIR* transportation analysis should isolate impacts associated with new growth areas

Refer to response to comment E-2-2.

E-2-6. *Draft EIR* inaccurately concludes impacts on water supply would be less than significant

Refer to common response #9.

E-2-7. *Draft EIR* discussion of loss of agricultural production should recognize lack of irrigation water rights

The EIR discusses availability of water rights for irrigation; such rights are sufficient for anticipated demand.

E-2-8. *Draft EIR* contains discrepancies between number of acres of agricultural land lost in new growth areas and total size of new growth areas.

The EIR has been modified to reconcile any discrepancies.

E-2-9. *Draft EIR* apparently uses terms urban and unique to describe same quality of agricultural land

This comment refers to a typographical error; all references to "urban and local" have been changed to "unique and local."

E-2-10. Does *Draft EIR* Table 8-5 undervalue grazing land?

The County does not believe the EIR undervalues grazing land.

E-2-11. *Draft EIR* should address giant garter snake habitat

Wester Placer County is not considered suitable habitat for the giant garter snake. This species is not expected to occur east of the Natomas Main Drainage Canal and contiguous riparian and rice field habitats. In addition, this species was not included in list prepared by the USFWS of listed and proposed Endangered and Threatened Species and Candidate Species.

E-2-12. *Draft EIR* air quality analysis should isolate impacts of new growth areas

Refer to response to comment E-2-2.

E-2-13. *Draft EIR* alternatives analysis does not fulfill requirements of CEQA.

Chapter 10 of the Final EIR includes a revised discussion of the CEQA-required alternatives analysis.



Sierra Club

PLACER GROUP
P. O. BOX 7167
AUBURN, CA 95604



November 13, 1993

Placer County Planning Dept.
Attn: Loren Clark
11414 B Avenue
Auburn, CA 95603



Re: Placer County General Plan Draft EIR 11/13/93

Dear Loren,

PLANNING DEPARTMENT

On behalf of the Placer Group of the Sierra Club, I would like to submit these comments concerning the adequacy of the Countywide General Plan Draft EIR.

Project Objectives

Project objectives number 3 and 5 are not accurate statements of what the Plan accomplishes. Either these objectives, or the Plan, should be modified so that they agree. Since the DEIR identifies as unmitigated impacts the loss of farmland and the loss of agricultural production, objective number 3 is not met. Regarding objective number 5, the 500,000 population cap was abandoned by the Board of Supervisors in favor of a cap only on the unincorporated areas. The Plan actually provides for over 620,000 people when the cities are included. It is misleading to include the 500,000 cap in this document.

E-2-1

Impact Summary

Along with public disclosure, the primary purpose of an EIR is to aid decisionmakers. Whether or not to provide for the New Growth Areas (NGAs) in what is currently zoned for agriculture is the major decision facing Placer County-- both in terms of the degree of change over the existing general plan, and in whether the negative impacts that would result make the changes in land use worthwhile. Therefore, it would be helpful if this section contained a concise accounting of the negative impacts which are largely attributable to the NGAs.

E-2-2

Holding capacity of the Draft General Plan

Table 2-3 indicates that the NGAs encompass 17,755.88 acres and allow 40,632 D/U. The Draft Policy Document, however, shows NGA totals of 15,447 acres and 40,702 D/U.

E-2-3

Land Use

The Villages of Dry Creek specific plan extends east of Watt Avenue into an area not anticipated to experience urban growth under the Dry Creek/West Placer Community Plan (DCWPCP). This scenario would seem to require amending the DCWPCP DEIR since areas east of Watt would now be impacted in new ways. The DCWPCP itself would need amending, since urban development east of Watt would contradict Land Use Goals #1,2,3, and 6.

E-2-4

Transportation and Circulation

Decision-makers should be provided with tables clearly showing the impacts on vehicle trip generation and LOS that would be attributable to the NGAs, as opposed to the impacts that the area would be expected to experience as the result of growth in west Placer without NGAs. There is no way to distinguish just what the impacts to traffic would be from this analysis.

E-2-5

Infrastructure--Public and Private Water Systems

Page 5-12, 5-13. The DEIR notes that NID and PCWA lack sufficient water rights to serve both agriculture and the domestic needs in western Placer County, due to the the expanded holding capacity created by the NGAs. The DEIR does not make this sufficiently clear. The impact is significant and unmitigated; it should be noted as such.

E-2-6

Page 15. It is not true that impacts on water agencies ability to meet demand would be less than significant. As noted above, The land use plan makes the listed mitigation policies infeasible in west Placer. Water supplies are not adequate, over the long term, to serve the needs of both build-out and agricultural irrigation.

Agricultural Resources

Discussion of the potential loss of agricultural production should include the fact that the lack of sufficient water rights to serve both NGAs and agriculture has the potential to negatively impact production still further. This appears to conflict with General Plan goal 7.D and policies 7.D.1 and 7D.6.

E-2-7

Table 8-2. Why are there disparities between the acreage of farmland to be converted for each NGA as set forth in the DEIR when compared to the specific plans in the Draft Policy Document? As an example, the DEIR shows 6,290 acres

E-2-8

of farmland directly and potentially converted for Placer Villages, yet this is 350 acres more than the total acreage in the specific plan for this development. An even larger disparity exists for Stanford Ranch West. Why?

E-2-8

Tables 8-2 and 8-3 use different terms for what is apparently the same type of farmland. One uses "unique and local", while the other uses "urban and local". The text uses only "unique and local".

E-2-9

Table 8-5. The table deals with the loss due to conversion of the gross value of production (GVP) for various types of farming. Combining both direct and indirect affects, the loss of GVP for field crops is 12%; the drop for fruit and nut crops is 64%; the loss for grazing is 16%. Yet the overall loss of GVP for farmland is only 9%. Considering the fact that timber production has been excluded, one wonders what this "other" is--whose value is \$60 million--more than twice the GVP of all crops and grazing? Seeking an answer, the Draft Background Report (DBR) was referenced.

E-2-10

Table 9-7 in the DER shows the breakdown for agricultural production. Livestock and poultry accounts for \$23,610,000 in GVP, yet only \$549,000 of that is attributed to grazing land in Table 8-5 of the DEIR. Livestock production is still substantial in Placer County; it must account for a large portion of the total. In this county livestock is primarily grazed rather than pen-fed. Is the production value of grazing land being under-valued in DEIR? If so, the loss in GVP due to conversion of farmland is understated in the DEIR.

Vegetation and Wildlife Resources

Since the writing of the DBR, the giant garter snake has been listed as threatened by the USFWS. Does suitable habitat for this species exist in west Placer? If so, this should be noted, along with any appropriate mitigation measures.

E-2-11

Air Quality

To assist decision-makers and inform the public, the DEIR should discuss the contribution to air pollution of the NGAs. The NGAs have the potential, perhaps, to minimize emissions when compared to an equivalent holding capacity in more typical growth patterns. But because of their distance from other urban areas, the opposite may also occur--if residents must commute to employment elsewhere, or if shopping opportunities are inadequate where they live. Which

E-2-12

scenario is most likely? If equivalent growth was directed to existing communities, how would the air quality impacts compare?

E-2-12

Alternatives

Deferring the choice and evaluation of alternatives to the Issues and Options phase does not fulfill the requirements of CEQA.

1. It appears that no scoping process took place in which a reasonable range of alternatives was considered-- prior to narrowing the number down to a few representative final alternatives to be included in the DEIR.
2. The Issues and Options Report stated that the alternatives are "conceptual" in nature. Relevant case law requires that alternatives be specific enough to be meaningful. Like the land use plan that was formulated, meaningful alternatives would be expected to be more specific--not just conceptual. They would be expected hybrids, like the preferred alternative, and incorporate in various degrees two or more of the three basic concepts.
3. Alternatives must be chosen in conjunction with the preferred alternative in order to offer alternatives with substantial environmental advantages to the project. At the time the alternatives were selected, there was no preferred project upon which to base formulating alternatives.
4. The DEIR does not consider a true "no project" alternative. Alternative number 2 does not, as stated, "closely approximate" a no project alternative. Number 2 would provide for additional growth adjacent to cities and unincorporated communities. A true "no project" alternative would simply continue the 1967 General Plan.

E-2-13

We look forward to your response to our comments.

Sincerely,

Terry Davis

Terry Davis
Comment Preparer

Matt Bailey

Matt Bailey
Chair, Placer Group Sierra Club

E-3 California Mule Deer Association (11/14/93)

- E-3-1. *Draft EIR* should identify impacts on Loyalton-Truckee deer herd due to residential development in eastern county as significant

The EIR concludes that development under the Draft General Plan will not affect any critical range habitat of the Loyalton-Truckee Herd, so the impacts are not considered significant.

- E-3-2. *Draft EIR* fails to identify significant effects of habitat reduction

The EIR considers these factors and concludes that development under the Plan could convert or reduce the quality of some of Placer County's wildlife habitat areas.

- E-3-3. County has neglected to confirm need for several community plan updates

This statement is incorrect. The County has an ongoing program for the evaluation and revision of its community plans. In addition, Program 10.5 from the Policy Document articulates this practice as an important part of the ongoing implementation of the Countywide General Plan.

- E-3-4. Critical wildlife areas are not adequately protected; 20-acre minimum parcels would do so

The County feels that the General Plan affords significant and sufficient protection for these areas.

- E-3-5. *Draft Plan* program 6.14 implies that mitigation fees will be acceptable in lieu of loss of open space; this conflicts goals and policies

The County feels that the acceptance of in-lieu fees is one acceptable approach to compensating for open space loss.

- E-3-6. Placer County should rely more heavily CDFG and not waste money

The County feels that its role in the protection of Placer County's natural resources is important and that the level of involvement implied by the General Plan is appropriate.

- E-3-7. CMDA prefers Alternative 1 from the Issues and Options Report

Comment noted; no response necessary.

- E-3-8. CMDA supports the immediate implementation of Implementation Program 6.10 (Habitat Management Plan)

The Policy Document indicates that Implementation Program 6.10, which calls for the preparation of a Habitat Management Plan, will be initiated in 1995 and will take approximately 2 years to complete. Given the level of coordination and expenditure of resources necessary to implement the program, the County feels that this is a reasonable time frame.

CALIFORNIA MULE DEER ASSOCIATION



Mr. Loren Clark, Senior Planner
Placer County Planning Department
11414 E Avenue
Auburn, CA 95603

Dear Mr. Clark,

11/1/79

The California Mule Deer Association (CMDA) has reviewed the Draft EIR for the Placer County General Plan Update and provides the following comments and concerns:

- 1. Draft EIR p.8-29 under Migratory Deer Herd fails to identify the Loyalton-Truckee herd as being significantly affected by residential growth in the eastern portion of the County. This should be amended.
- 2. Draft EIR p.8-28 under Habitat Conservation or Quality Reduction fails to adequately identify that significant impacts occur to wildlife habitat from associated suburban and residential development from fragmentation of much larger parcels as well. The U.S.F.S. as well as CDFG has clearly identified habitat impacts from roading, structures, domestic pets, noise, etc. on areas much larger than 10 acre lots. 20 acre minimum lots have been identified by CDFG as being minimally acceptable for key deer areas.
- 3. Placer County has completely neglected to confirm the need of several Community Plan updates to adequately reflect the present environmental conditions, cumulative impacts, and needed revisions to adequately protect wildlife habitat. These plans include: Alpine Meadows, Foresthill, Martis Valley, Squaw Valley, Tinker Knob and Ward Valley. These Communities have changed drastically since their plan inceptions and to simply validate them is negligent.
- 4. Adequate protection is not provided for critical wildlife areas, including deer as an "indicator species" by establishing these areas with minimum lot sizes of twenty acres or larger. These areas are easily identified through cooperation/consultation with CDFG Biologists.
- 5. Draft Policy Document Implementation Program #14 p. 38 implies that mitigation fees will be established and acceptable in lieu of open space loss. If true, it clearly conflicts with open space goals and policies. This needs to be clarified and you amended so as not to conflict

E-3-1

E-3-2

E-3-3

E-3-4

E-3-5

6. Many of the wildlife/natural resource goals and policies are conceivable. To save taxpayer time/expense, CMAA strongly recommends Placer County take advantage of the extensive natural resource inventory programs and information and requests that all natural resource implementation programs for the GP update be amended to clearly confirm that Placer County will clearly look to the CDFG as our Trustee Agency on all natural resource protection requirements and implementation programs. PLACER COUNTY DOES NOT NEED TO REINVENT THE WHEEL.

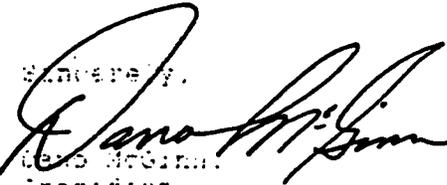
E-3-6

7. CMAA strongly recommends Placer County adopt land use alternative 1 due to its overwhelming advantages to long Housing/Agricultural/Natural Resources, including wildlife habitat, air quality.

E-3-7

CMAA thanks you for the opportunity to comment.

Sincerely,


Denis McGinnis
President

RS

Loon

The Habitat Management Plan (HMP) is a good idea and should be implemented immediately.

E-3-8

E-4 Rural Auburn Preservation Society (11/15/93)

- E-4-1. RAPS does not understand relationships among various documents prepared as part of General Plan Update

The County feels that the structure of and relationship among the General Plan documents are clear and understandable.

- E-4-2. Draft EIR alternatives analysis is insufficient

Refer to common response #1.

- E-4-3. Draft Land Use Diagram is not consistent with project objectives stated in Draft EIR

The EIR's project objectives summary has been modified, as has the nature of the project; the County feels that, with these changes, the two are consistent.

- E-4-4. Draft EIR impact summary is not adequate under CEQA

Refer to common response #1.

- E-4-5. Draft Plan and Draft EIR do not have a separate element for open space

State law does not require that general plans include something called an "open space element," but it does require them to cover the topical specified under requirements for an open space element. The Policy Document does so.

- E-4-6. Table 8-7 from the Draft EIR should include the Giant Garter Snake

Wester Placer County is not considered suitable habitat for the giant garter snake. This species is not expected to occur east of the Natomas Main Drainage Canal and contiguous riparian and rice field habitats. In addition, this species was not included in list prepared by the USFWS of listed and proposed Endangered and Threatened Species and Candidate Species. Table 8-7 from the Draft EIR has been moved to the Background Report.

- E-4-7. Draft Plan riparian area buffers are inadequate

The Policy Document has been modified to more specifically address riparian setback requirements. The County feels that the Policy Document adequately addresses habitat protection.

- E-4-8. Trails in riparian areas are inappropriate

The General Plan supports the development of a countywide trails systems, but does not address the specifics of the location and type of trails. This level of specificity will be more appropriately dealt with through the community plan and project development process that implements the Countywide General Plan.

E-4-9. RAPS strongly supports establishment of an RCZ overlay district

Comment noted; no response necessary.

E-4-10. *Draft Plan* needs additional implementation programs to ensure habitat conservation

The County feels that the programs included in the Policy Document are appropriate to achieve the policy objectives.

E-4-11. *Draft EIR's* cumulative impact summary should cite all 8 significant and potentially significant adverse impacts

The Final EIR includes an expanded discussion of cumulative impacts.

E-4-12. *Draft EIR* should isolate impacts of new growth areas

While the County concedes that such an analysis might be informative, it does not feel that it would be appropriate, or necessary, for the EIR to isolate the potential impacts of development in the new growth areas. According to the Policy Document, development in the new growth areas will proceed according to the provisions of specific plans that will require a detailed analysis of potential impacts. Furthermore, the new growth areas that were the cause of the greatest impacts no longer appear on the Land Use Diagram.

E-4-13. *Draft EIR's* approach to mitigation monitoring is inadequate

The County disagrees. Refer to common response #2.

Rural Auburn Preservation Society (RAPS)

Representing the Communities of Christian Valley, Bowman, Black Oak Estates,
Saddleback Estates, Shadow Rock Estates, and the greater rural Auburn area

P. O. Box 923
Meadow Vista, California 95722

Telephone:
(916) 878-2294

November 15, 1993

Loren Clark, Senior Planner
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RE: Countywide General Plan Draft Environmental Impact Report

Dear Mr. Clark:

As Chair of the Rural Auburn Preservation Society, I am submitting the following comments on the adequacy of the Countywide General Plan Draft Environmental Impact Report.

Format of General Plan Documents

On page 1 of the DEIR it states, "four separate General Plan documents are being used to satisfy the requirements for a draft EIR. These are: (1) the *Draft Countywide General Plan Policy Document*, (2) the *Draft General Plan Background Report*, (3) the *General Plan Issues and Options Report*, and (4) the *Environmental Impact Report*."

On page 1-1 of the DEIR it states, "a thorough description of the environmental setting of Placer County is contained in the *Draft General Plan Background Report*, which is formally incorporated as part of this *Draft EIR*."

On page 1-4 of the DEIR it states, "The *Draft Countywide General Plan* consists of two documents: the *Draft General Plan Background Report* and the *Draft General Plan Policy Document*."

These statements indicate that the *General Plan Background Report* is a formal part of both the *DEIR* and the *General Plan Policy Document*, yet page 4 of the *Draft General Plan Policy Document* states that the *DEIR* "is not a formal part of the *General Plan*."

It is not clear in what way the *Issues and Options Report* is part of the *DEIR* or whether comments on all four documents are relevant in reviewing the *DEIR*. The format chosen for this *DEIR* is confusing and not very accessible to the public, requiring excessive cross-reference

E-4-1

between documents. This DEIR would not be adequate to serve as a Program EIR and a Master Environmental Assessment, which is indicated as the county's intent (page 4 of the DEIR).

E-4-1

Alternatives

CEQA requires that an EIR "describe a range of reasonable alternatives to the project which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." [CEQA Guidelines, 15126 (d).]

The DEIR briefly discusses the three land use alternatives presented in the *Issues and Options Report* and reprints the comparative analysis chart from that document. There is no evaluation as to which of these alternatives is environmentally superior nor is there any comparison to the hybrid "Alternative 5" selected by the Board of Supervisors.

All three of the alternatives offered in the *Issues and Options Report* appeared to be less environmentally impacting than Alternative 5, but the most environmentally superior alternative supported by two of the supervisors, Alternative 4, was not even mentioned in the DEIR.

The DEIR states that the "no project" alternative would be the continued implementation of the County's 1967 General Plan and that Alternative 2 closely approximates that Plan. We do not believe that Alternative 2 provides an adequate "no project" alternative. It is not described as a continuation of the existing general plan in the *Issues and Options Report*, which on page 3-2 states, "Alternative 2 could result in the greatest change to the county's urban form and the appearance of unincorporated communities and rural landscapes."

E-4-2

The DIER claims that the information necessary for the Board to consider the impacts of the "no project" alternative was provided in the *Issues and Options Report's* analysis of Alternative 2. This Report was not an EIR. It did not discuss in any detail the adverse impacts of the suggested alternatives. It was not reviewed or commented upon by the Planning Commission, and oral public comment on the Report was restricted to one 3-minute presentation at one Board hearing for any individual. In effect, the Board selected its preferred alternative without the benefit of EIR analysis or adequate public input. The alternative developed by the Board was not based on any environmental evaluation or planning criteria. It was selected on the basis of providing big developers with the opportunity to build their "new towns" on land that was zoned for agriculture. The alternative chosen by the Board is actually in conflict with the stated goals and policies of the *Draft General Plan Policy Document*, as well as those of the existing Agricultural Element and Right to Farm Ordinance.

The discussion of alternatives in the *Issues and Options Report* and in this *DEIR* does not, as required by CEQA, "focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance..." These documents do not even mention the merits of the various alternatives, much less "evaluate the comparative merits of the alternatives" as required by CEQA.

E-4-2

Project Objectives

The land use alternative selected by the Supervisors does not appear to meet their "primary objectives" as stated on page 1-6. The grandchildren of existing residents would be better "protected" if existing zoning were upheld, since population increasing at the rate of natural population increases (births less deaths) would only equal 210,000 people by 2010 rather than the 312,300 estimated on Table 2-4.

A population cap of 500,00 is not based on any factual evaluation of the whole state's growth rate in relation to Placer County's. Additionally, the land use alternative selected by the Board made the 500,000 cap meaningless since the Plan provides for a population of over 620,000.

E-4-3

We further object to the use of 2.5 persons per dwelling unit to calculate future populations instead of the current standard of 2.72. While 2.5 may prove to be appropriate for the year 2040, it is not valid now.

Objective #3 is to protect agricultural lands, which the Board is certainly not doing by approving urban development on agricultural land. This not only removes thousands of acres from direct agricultural production but threatens adjacent farming viability with urban encroachment.

Impact Summary

The DEIR's "Impact Summary" on pages 1-9 through 1-11 is not adequate under CEQA. The Guidelines state that "the summary shall identify: (1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect; (2) Areas of controversy known to the Lead Agency including issues raised by agencies and the public; and (3) Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects." [Guidelines 15123] The DEIR does briefly discuss the 8 potentially-significant or significant adverse impacts of the proposed Plan, and admits that no additional feasible mitigation measures are identified beyond those incorporated as *General Plan* policies and programs. The DEIR does not include any discussion of benefits or choices of alternatives nor areas of controversy.

E-4-4

Open Space Element

The Open Space Element is a required element of the General Plan. The Government Code states that the primary purpose of this element is to "assure that cities and counties recognize that open-space is a limited and valuable resource which must be conserved wherever possible" and to discourage "premature and unnecessary conversion of open-space land to urban uses...and non-contiguous development patterns."

The DEIR and Policy Document do not have a separate element for open space, but discuss open space issues within other elements, such as natural resources. This makes it more difficult to evaluate whether or not the mandatory requirements for an Open Space Element have been included. While it appears that the preservation of open space will be actively pursued as required, the choice of the project itself violates the expressed purpose of the element.

E-4-5

Natural Resources

The Giant Garter Snake should be added to the USFWS's "Listed and Proposed Endangered and Threatened Species and Candidate Species" (Table 8-7) as well as to the special status species list on page 8-26 and to the Background Report data.

E-4-6

Riparian areas require more of a buffer zone than a minimum width of 50 feet from a stream bank if they are to provide wildlife corridors. While the creek itself may be protected from habitat degradation, the adjoining habitat should be protected for a minimum of 100 feet. Much wider corridors are needed to provide adequate travel corridors for wildlife species in many situations. A wildlife corridor of 1200 feet is often suggested by the DFG and other wildlife experts.

E-4-7

The inclusion of trails (other than natural surface ones) in riparian habitat can be detrimental to wildlife. Placement of trails too close to stream corridors can be hazardous to human safety and to the trail itself when heavy rains occur.

E-4-8

We would strongly support the establishment of a resource conservation zone overlay district as stated in Implementation Program 6.6 of the *Policy Document*. This measure should be changed to read, "The County shall establish..." rather than "shall consider establishing..."

E-4-9

Policy Goal 6.D.6, "The County shall ensure the conservation of sufficiently large, continuous expanses of native vegetation to provide suitable habitat for maintaining abundant and diverse wildlife," appears to need additional implementation programs than 6.12 and 6.13, which deal with developing and maintaining species lists and resource inventories.

E-4-10

Cumulative Impacts

Chapter 10 of the DEIR, "Mandatory CEQA Sections," includes a paragraph on "Cumulative Impacts". While increased traffic, degradation of air quality and loss of agricultural lands were mentioned, the significant cumulative impacts on conversion and reduction in quality of habitat were not. Since these impacts, eight of which are detailed on page 8-34, are substantial and cannot be mitigated to less than significant levels, they should be added to the list of cumulative impacts.

E-4-11

It would also be helpful in evaluating the impacts of the proposed Plan for the DEIR to indicate specifically which impacts are the result of, or are greatly increased by, the inclusion of new growth areas in western Placer county.

E-4-12

Mitigation Monitoring

The DEIR does not provide a mitigation monitoring plan to assure that the proposed mitigation measures in the Policy Document will be successful. Mitigation monitoring is required to be included in EIRs not only to assure successful mitigation but to allow public review and comment of the monitoring plans.

For the DEIR to state that mitigation monitoring will consist only of review of the Plan by the Planning Commission annually and by the Board every 5 years appears to be inadequate under CEQA. Implementation Program 10.1 also appears to say that any changes needed will be recommended for amendments to the General Plan. There should be some provision for mitigation monitoring that does not require general plan amendments and does involve public participation.

E-4-13

Conclusion

Thank you for the opportunity to comment on the Countywide General Plan Draft Environmental Impact Report. We look forward to your response to our comments in the Final EIR.

Sincerely yours,



Sharon P. Cavallo
Chair, RAPS

F. Property Owners and Developers

F-1 Wickland Properties (Bickford Ranch) (11/10/93)

F-1-1. *Draft Plan* is far too specific; detail should be deferred to the specific plan process

The Policy Document's standards for the Bickford Ranch area (see Appendix C) are based on the descriptions provided to the County by the project proponents. The County feels that these standards represent an appropriate balance of specific and general requirements.

F-1-2. *Draft Plan* makes inappropriate recommendations for Bickford Ranch

Refer to response to comment F-1-1.

F-1-3. Requested revisions to Draft Policy Document relating to Bickford Ranch

The Policy Document has been changed as requested (see Appendix C).

5771

EIR
file



November 10, 1993

- Mr. Larry Sevison
- Mr. Frank Aguilar
- Mr. Doug Hoffman
- Ms. Terry Cook
- Ms. Judy Creek
- Mr. Al Saraceni
- Mr. Robert Weygandt

Dear Planning Commissioners:

We wish to comment in a general way regarding the Draft EIR and the Draft Policy Document of the Countywide General Plan, and then more specifically as it relates to our property which is commonly known as the Bickford Ranch.

We believe that there is item after item in the draft documents that are far more specific than they should be in a General Plan. The purpose of a General Plan should be the wide parameters. It is at the Specific Plan stage that exact locations, inter-Specific Plan land use relationships, and building types should be determined. Only at the Specific Plan, and not at the General Plan stage, will you have available: 1) the Specific Plan EIR, 2) the Traffic Studies, 3) the Fiscal Impact Studies and 4) the comprehensive plan advocated by the developers' professional land planners. Also, it is only at the time of the Specific Plan that you have the benefit of inputs from both the proponents and the critics of the project.

F-1-1

Regarding the Bickford Ranch, we are troubled in particular by two dictates in the draft documents that we believe clearly to be Specific Plan issues. They are:

- 1) Specifying that our major commercial area is in the center of the plan area.
- 2) Specifying that our open space includes the relatively level area below the ridgetop.

Candidly, we think a better land plan is to have a recreation village in the center of the plan area, but the major commercial should be at the entrance way. We believe the future traffic study will support this. We believe the future fiscal impact study will support this. We believe the future commercial tenants will insist on an entrance area location rather than an interior location. Frankly, we believe just plain common sense will support it.

F-1-2

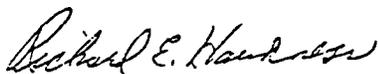
November 10, 1993
Page 2

Likewise, we believe now is not the time to dictate exactly where the open space will be. We will have buffers to deal with and we are willing to concede up to 980 acres of open space for buffers, drainage ways, corridors along canals and major roadways, and active and passive recreation areas. It is simply premature to state in a General Plan that both slopes (undefined as to what are slopes) and our 250 acres of dormant pasture should also be open space. In fact, we plan to use a major portion of that pasture for our golf course, but the overall theme of the entire project as well as the economics of the upscale quality of the golf facility we desire requires some well-buffered housing in that pasture.

F-1-2

I wish to make it clear that we are not here today to determine where the commercial area should be, nor to locate the golf-related housing areas. Rather, our intent is to reserve that Planning Commission and Board decision to a future time when you have the necessary studies and when all arguments both pro and con can be publicly made. We ask that you move to include modifications to the draft documents in your recommendation to the board as per attached exhibit A. Thank you.

Sincerely,



Richard E. Haukness

REH:ew

Enclosure

cc: Mr. Fred Yeager

EXHIBIT A

Recommended changes to the Draft Policy Document for the Placer Countywide General Plan (relating to Bickford Ranch).

CHANGE #1 - Page 129 under Development Standards.

NOW READS:

2. Commercial uses: A maximum of 14 acres of commercial uses, with typical land uses allowed as listed in Part I for the General Commercial land use designation. Commercial uses shall be concentrated within the center of the plan area, with the possibility of a small commercial area (+2 acres) at the primary entrance at Sierra College Boulevard.

CHANGE TO:

2. Commercial uses: A maximum of 14 acres of commercial uses, with typical land uses as listed in Part 1 for the General Commercial land use designation. Location and design standards to be determined at the time of the Specific Plan.

F-1-3

CHANGE #2 - Page 129 under Development Standards.

NOW READS:

3. Open space: A minimum of 980 acres, including the slopes of Boulder ridge, drainage ways, corridors along canals and major roadways, the lower, relatively level areas below the ridgetop, and active and passive recreation areas.

CHANGE TO:

3. Open space: A minimum of 980 acres including undeveloped buffer area, drainage ways, corridors along canals and major roadways, and active and passive recreation areas.

F-2 KD Anderson (Bickford Ranch) (11/11/93)

F-2-1. *Draft Plan* LOS "B" standard for rural roadways should be changed to LOS "C"

The recommended change has been incorporated in the Policy Document.

F-2-2. *Draft Plan* should designate segment of Sierra College Boulevard as a Urban/Suburban Minor Arterial, rather than as a Rural Arterial

Sierra College Boulevard north of Loomis traverses a rural area, including the proposed Bickford Ranch property which is designated as rural residential in the General Plan. This roadway, therefore, is designated as a rural arterial on the Circulation Diagram and the revised Table 1-7 in the Policy Document. This classification allows widening to a 4-lane facility as called for in the Final EIR. This section of Sierra College Boulevard lies along the border of the South Placer and the Auburn-Foothills areas. In the corrected Table 1-7 this roadway will be listed under the South Placer area.

K D Anderson

Transportation Engineers

November 11, 1993

PLACER COUNTY
DATE
RECEIVED

NOV 10 1993

Mr. Fred Yeager
PLACER COUNTY PLANNING DEPARTMENT
11414 "B" Avenue
Auburn, CA 95603

PLANNING DEPARTMENT

RE: COMMENTS ON THE DRAFT GENERAL PLAN POLICY DOCUMENT AND
DRAFT GENERAL PLAN ENVIRONMENTAL IMPACT REPORT.

Dear Mr. Yeager:

kdANDERSON Transportation Engineers has been asked by the owners of the Bickford Ranch property to review the Transportation / Circulation elements of the referenced documents on their behalf. Following that review and a discussion between ourselves and our client, we have been asked to communicate two areas of concern and comment to you. The identified concerns relate to the establishment of a Level of Service "B" as the minimum standard for rural roads and to an inconsistency in the Functional Classification designated for Sierra College Boulevard.

Level of Service "B". We were surprised to see the draft documents set a "B" Level of Service goal on rural roads. We are not aware that this issue was discussed at either the Planning Commission or at the Board level. In general, while we acknowledge it is a laudable goal, we believe it to be unrealistic from the standpoint of long term economic feasibility. Most other California counties now recognize that LOS "C" is perhaps the highest Level of Service that can be maintained into the future, with many counties now acknowledging that in the future they may have to accept LOS "D" at peak times. This condition is particularly acute in outlying rural areas where the overall capacity of typically substandard roads is relatively low to begin with. As existing 5 and 10 acre parcels continue to build out in these areas, we are concerned that funding will not be available to support a goal of LOS "B". We recommend that the Level of Service standard be LOS "C" for both rural and urban/suburban roadways.

F-2-1

Mr. Fred Yeager
PLACER COUNTY PLANNING DEPARTMENT
November 11, 1993
Page 2

Classification of Sierra College Boulevard. We notice that Table I-7 on page 27 of the Draft Policy Document classifies Sierra College Boulevard from Loomis to Route 193 "Urban/Suburban Minor Arterial". In the same table on Page 29, the road is designated as a "Rural Arterial". We think the road is clearly more than a Rural Arterial and should be classified at least as a Urban/Suburban Minor Arterial when the document is finalized.

To support this recommendation, we would point to the modern design standard, the limited number of driveway encroachments that exist, and the wide right of way which is already County owned for future expansion. Further, from discussions with our client, we are aware of a tremendous volume of testimony from the mid 70's when Supervisor Radovich led the movement for the development of Sierra College Boulevard up to Route 193. Repeated comments were made at that time as to the "Regional Wide" need to build this "Major Arterial" to "open up the region". Clearly, this road was planned to be more than a typical Rural Arterial.

F-2-2

Thank you for your consideration of these two issues. Please feel free to contact our firm if you have any questions.

Sincerely,

kdANDERSON Transportation Engineers



Kenneth D. Anderson, P.E.
Principal

cc: Supervisors (5)
Planning Commissioners (7)
Mintier & Associates
John Krogsrud for Placer County DPW
Rick Haukness (Wickland)

F-3 Robbins & Livingston (Villages of Blue Oaks) (11/12/93)

- F-3-1. *Draft Plan* designates Villages of Blue Oaks site as Ag, although it is of marginal agricultural value and Williamson Act contracts are under non-renewal

The General Plan does not direct growth away from the cities. It does, however, provide opportunities for growth to go elsewhere; market demand will determine the appropriateness and timing of locations. While the Land Use Diagram does designate the Blue Oaks site as Ag, based on information provided by the City of Roseville, the DEIR does assume some development in the area by virtue of annexation to Roseville.

- F-3-2. City of Roseville has initiated proceedings to include Blue Oaks site in its SOI, yet *Draft Plan* seems not to anticipate annexation of area

See response to comment F-3-1.

- F-3-3. *Draft EIR* growth assumptions appear to be based on a pattern of non-contiguous growth

This observation is correct. With changes to the Land Use Diagram, however, the Final EIR no longer assumes such a pattern.

- F-3-4. *Draft EIR* should recognize selection of another land use alternative as feasible mitigation

Refer to common response #1.

- F-3-5. *Draft EIR* does not explain why environmentally superior land use alternative was rejected

Chapter 10 of the Final EIR has been modified to address this concern.

- F-3-6. *Draft Plan* buffer requirements appear geographically or economically infeasible

The urban separator buffer, to which this comment refers, has been removed from the Policy Document.

- F-3-7. Land Use Diagram should redesignate Blue Oaks site from agricultural to Ag-Planning Reserve, or something similar

Comment noted; for the purposes of the County, however, the referenced site will remain agriculturally-designated.

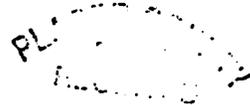
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November 12, 1993



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PLANNING DEPARTMENT

Loren Clark
Placer County Planning Department
1141 B Avenue
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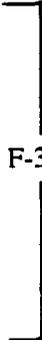
RE: DEIR Comments for Placer County General Plan

Dear Mr. Clark:

Lone Tree Partners and the Fiddymment family are the major project proponents for Phase I of the Villages at Blue Oaks. The Villages at Blue Oaks are located immediately adjacent to and west of the existing corporate limits of the City of Roseville. Incident to consideration of the Blue Oaks project, the City of Roseville has approved, authorized and submitted a proposal for a modification to Roseville's Sphere of Influence to include the Phase I area. This sphere boundary modification is presently pending before the Placer County Local Agency Formation Commission.

In addition, the City of Roseville has undertaken an elaborate, extensive and comprehensive land use update to analyze issues involved in accommodating growth within certain specified project areas within and immediately contiguous to the City's corporate boundaries, including Blue Oaks Phase I. The cost of this comprehensive analysis will exceed a half million dollars and the Lone Tree/Fiddymment group has been, and continues to be, a major contributor to this effort. It may also be the case that the Placer County General Plan Update and DEIR have significant ramifications for the Blue Oaks project. We are therefore submitting the following comments.

A primary concern for the Blue Oaks owners arises from provisions in the General Plan and DEIR which appear to suggest that growth during the balance of the century will be diverted away from existing municipalities and service providers and directed to four "new growth areas" in the unincorporated area. The Blue Oaks site appears to have been designated as an "Ag" zone in the General Plan, although most of the property is of marginal agricultural value and all of the properties currently subject to Williamson Act contracts have filed for non-renewal. In addition, the site is immediately adjacent to the Del Webb project. Because the General Plan does not appear to provide for the possibility of growth in Roseville by annexation, it may affect the ability of the Fiddymments and of Lone Tree to proceed with the Blue Oaks project.



F-3-1

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Loren Clark
Placer County Planning Department
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As noted above, the City of Roseville has initiated proceedings with Placer County LAFCO to expand its Sphere of Influence to include the Blue Oaks site. Full pursuit of the sphere boundary change is being deferred until the City's studies on the land use alternatives and environmental impacts have been completed and the Land Use Element of the City's General Plan has been revised. Thereafter, annexation will be considered for the site. The apparent lack of any provision in the County's General Plan for growth in urban areas through annexation could adversely affect the efforts of the City of Roseville to plan for the City's development needs in a logical and environmentally sensitive manner through contiguous development and incremental expansion of services and infrastructure.

F-3-2

The growth assumptions utilized in the DEIR appear to be similarly based on a pattern of non-contiguous growth. In estimating future development needs, the DEIR assumes that development in Roseville will slow by 2010 because the City will then be reaching "buildout." This assumption overlooks the fact that Roseville, like other cities, could add to its existing capacity through annexation. At a minimum, the DEIR should reflect the land use changes currently being processed by the City of Roseville as part of its Comprehensive Land Use Element analysis.

F-3-3

These observations also raise questions concerning the DEIR's conclusion that "there are no feasible mitigation measures beyond the policies and programs included in the Draft Policy Document that would minimize the adverse impact resulting from the alteration of planned land use in the western county" (DEIR, 1-9). An alternative land use plan that directs growth to urban areas constitutes a feasible mitigation measure for the adverse environmental impacts associated with non-contiguous urban development as identified by the DEIR, including loss of agricultural land, open space and wildlife habitat. As such, it should be thoroughly addressed. Indeed, the Williamson Act expressly favors development of lands contiguous to existing urban areas.

F-3-4

Perhaps more significantly, the DEIR contains no analysis of the project alternatives set forth in the Issues and Options Report, and it fails to discuss why the environmentally superior alternative -- directing growth to existing urbanized areas -- is rejected in favor of an alternative land use plan that would appear to cause the most serious adverse environmental impacts. The DEIR also lacks a cumulative project list and analysis for all proposed development projects in the South Placer Region.

F-3-5

Finally, the buffer requirements set forth in the DEIR and General Plan do not appear to be either geographically possible or economically feasible, at least in some instances. For example, Stanford Ranch West, one of the proposed new growth areas, is situated on Blue Oaks' northern and eastern boundaries. Since the General Plan proposes a one mile urban separator buffer encompassed entirely within each new growth area, minimal land would be left on the Stanford Ranch West site for actual development. Thus, it may be that the developer could be compelled to acquire sufficient surrounding acreage to meet the buffer requirements. It is not our

F-3-6

Loren Clark
Placer County Planning Department
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impression that the principals of Stanford Ranch West have concluded that this acquisition effort would be economically feasible.

F-3-6

Accordingly, on behalf of the Fiddymont family and Lone Tree Partners, the Commission is urged to revise the General Plan Update and DEIR to allow for logical growth, contiguous to Placer County's existing urban areas. Specifically, we request that the General Plan Draft be modified to acknowledge the unique status of the area covered by the Villages at Blue Oaks by redesignating the project site from "Ag" to "Ag - Planning Reserve" or some other "overlay" classification with a similar purpose and effect. This would expressly recognize the continuing consideration of the Blue Oaks project without compromising the County's goals of providing for the efficient accommodation of growth and the protection of open space and prime agricultural lands.

F-3-7

Very truly yours,

Linda Emerson

Linda Emerson

J. Cleve Livingston

J. Cleve Livingston

le/jn

F-4 Nossaman, Guthner, Knox & Elliot (Stanford Ranch West) (11/15/93)

F-4-1. Draft Plan should address financial feasibility of implementing General Plan

The County does not feel it is necessary to add a separate chapter to the Policy Document that focuses exclusively on financial concerns. A policy has, however, been added to the Public Facilities and Services Section that requires a fiscal analysis of major projects (i.e., residential project of 100 units or more or a non-residential project of at least 10 acres).

F-4-2. Draft Plan development standards for new growth areas should not be mandatory and should be less specific

The County realizes that there are state requirements for the preparation of specific plans. Furthermore, the standards to which this comment refers have been removed from the Policy Document.

F-4-3. Specific comments regarding Draft Plan development standards for Stanford Ranch West

The Stanford Ranch Specific Plan Area designation no longer appears on the Land Use Diagram, so the referenced standards have been removed from the Policy Document.

F-4-4. Draft Plan requirements for preparation of specific plans should reference State requirements to recognize changing standards

The referenced standards have been removed from the Policy Document.

F-4-5. Draft Plan LOS standards increase existing standards, making it more costly for small developers to develop

The Policy Document LOS standards have been revised; they should now satisfy the concern expressed by this comment.

F-4-6. Draft Plan Policy 7.D.6. calls for using reclaimed water for agricultural irrigation; Stanford Ranch West will generate no such water

The Stanford Ranch Specific Plan Area designation no longer appears on the Land Use Diagram, so the referenced policy no longer applies.

F-4-7. Earlier EIR concluded that landfill impacts affecting Stanford Ranch West are less than significant or nil; conclusions cited

Comment noted; no response necessary.

F-4-8. Draft Plan should not require development in new growth areas to finance transit services

Refer to response to comment F-4-3.

- F-4-9. *Draft Plan* should not require development in new growth areas to pay fees to enhance areas outside of the new growth areas

The Stanford Ranch Specific Plan Area designation no longer appears on the Land Use Diagram, so the referenced language from the Draft Policy Document no longer applies.

- F-4-10. *Draft Plan* Policy 1.B.7 should be eliminated

The Policy Document includes a modified version of this policy to eliminate the cited confusion.

- F-4-11. *Draft Plan* policy calling for new village center to provide variety should not be mandatory

The Stanford Ranch Specific Plan Area designation no longer appears on the Land Use Diagram, so the referenced policy no longer applies.

- F-4-12. *Draft Plan* should add policy calling for County to ensure a variety of vacant entitled property as an economic development aid.

The County feels that the Policy Document includes a strong set of policy statements related to attraction and retention of industrial development.

- F-4-13. Draft EIR overstates development potential

The EIR analysis is based on two points in time: 2010 (primarily) and 2040 (secondarily). The estimates of holding capacity are provided to give readers an idea of the magnitude of development that could ultimately occur; they are not the basis for the EIR's impact analysis.

- F-4-14. Draft EIR should state that adoption of the General Plan will not result in development entitlements in new growth areas

Comment noted; no response necessary.

- F-4-15. Draft EIR should state that development in new growth areas will be subject to environmental review

Comment noted; no response necessary.

- F-4-16. Draft EIR alternatives analysis should be revised and expanded

Chapter 10 of the Final EIR has been modified to address this concern. Also refer to common response #1.

- F-4-17. Draft EIR approach to mitigation should be more clearly explained

Refer to common response #2.

F-4-18. Draft EIR should explain relationship between General Plan and other adopted plans

The County feels that Chapters 1 and 2 of the EIR and the Background Report provide an adequate explanation.

F-4-19. Draft EIR description of project objectives and the Board of Supervisors' consideration of alternatives should be expanded

The Final EIR's project objectives summary has been modified, as has the description of the alternatives considered.

F-4-20. Draft EIR impact summary should be revised

Refer to common response #1.

F-4-21. Draft EIR should point out that county has a surplus of industrially-designated land

Chapter 2 of the EIR acknowledges this.

F-4-22. Draft Plan should defer mandatory imposition of buffers to the specific plan process

The County feels that it is appropriate to mandate the buffers at the General Plan level, but that the precise delineation of the buffers should be negotiated at the specific plan level.

F-4-23. Adopted Housing Element is not subject to review as part of Update process

Comment noted; no response required.

F-4-24. Draft Plan should investigate feasibility of roadway to bypass Roseville, linking new growth areas and I-80

The Draft Circulation Plan Diagram and DEIR considered a full range of feasible facilities; the roadway network reflected in the Circulation Plan Diagram is the system that, in the judgement of the County's Department Public Works and consultants, best serves the development allowed by the designations appearing on the Land Use Diagram.

F-4-25. Draft EIR should address effect of shifting growth from new growth areas to cities on I-80 and Highway 65

The EIR analyzes the development pattern established by the Land Use Diagram. The Issues and Options Report compared the effects of development concentrated in the cities with development in a new growth area.

F-4-26. County should review Roseville's comments on Draft EIR's traffic analysis

The Final EIR includes responses to all comments submitted on the Draft EIR, including those submitted by the City of Roseville.

F-4-27. Draft EIR should recommend feasible mitigation measures to address traffic in Roseville

Refer to common response #3.

F-4-28. Final EIR should address mitigation of traffic at or near ski resorts

The Final EIR includes such a discussion.

F-4-29. Final EIR should explain meaning of LOS F1, F2, and F3

The Final EIR defines these terms.

F-4-30. Final EIR should clarify effects of General Plan implementation on transit services

The County feels the Draft EIR's analysis of transit impacts was sufficient and has not significantly changed it for the Final EIR.

F-4-31. Final EIR should articulate specific, substantive measures to achieve AVR goals

The Countywide General Plan is not an appropriate place to articulate specific measures to be employed in ongoing efforts to affect vehicle ridership. Such measures are more appropriately described in the County's Trip Reduction Ordinance and individually-approved transportation systems management (TSM) programs.

F-4-32. Final EIR should discuss potential result of assumed transportation improvements not being realized

The Final EIR need not speculate about the unsuccessful implementation of the General Plan.

F-4-33. Final EIR should explain what "goods movement" environmental analysis consists of

The County feels that the Goods Movement section of the EIR is clear enough.

F-4-34. Final EIR should point out that specific impacts of developing water supplies will be identified in subsequent EIRs

Comment noted. Refer also to common response #9.

F-4-35. Final EIR should point out that specific impacts of wastewater projects will be identified in subsequent EIRs

The County does not feel such a statement is necessary.

F-4-36. Issues related to solid waste should be addressed in upcoming Integrated Waste Management Plan

Comment noted; no response necessary.

F-4-37. Final EIR should revise public facilities discussion to address financial impacts

Refer to common response #4.

F-4-38. Final EIR should incorporate schools analysis

Refer to common response #7.

F-4-39. Final EIR should expand policy responses related to facilities and services impacts

The Final EIR includes the full text of the mitigating policies, rather than just the policy and program numbers, so the relationship between mitigating policies and the impacts that they mitigate is now clearer.

F-4-40. Final EIR should address impacts of unincorporated development on services provided by City of Roseville

The Policy Document stipulates, and the EIR assumes, that new development will be required to provide for all infrastructure necessitated by the development. At the time that such development is proposed, the County will require that the providers of any services are consulted regarding the potential effects of the development; this would include the City of Roseville, if the development is assumed to rely on the City for any services and facilities.

F-4-41. Mitigation of archaeological impacts should not be addressed in Final EIR

Comment noted; no response required.

F-4-42. Draft EIR may prematurely find that agricultural conversion impacts are significant

While the County understands that adoption of the General Plan will not lead directly to the conversion of agricultural land, the EIR provides appropriate conclusions regarding the possible long-term effects of development, including agricultural land conversion resulting from development consistent with the Land Use Diagram.

F-4-43. Requests for additional mitigation measures in Final EIR are premature

Comment noted; no response required.

F-4-44. Draft EIR discussion of cumulative impacts is adequate

Comment noted; no response required.

F-4-45. Draft EIR approach to mitigation monitoring satisfies CEQA

Comment noted; no response required.

F-4-46. Draft Plan is internally consistent

Comment noted; no response required.

F-4-47. General Plan should remove Stanford Ranch West from Sunset General Plan area

The Stanford Ranch Specific Plan Area designation no longer appears on the Land Use Diagram, so the suggested change is no longer pertinent.

F-4-48. Draft EIR assumed growth rate for Stanford Ranch West new growth area should be faster

The Stanford Ranch Specific Plan Area designation no longer appears on the Land Use Diagram, so the suggested change is no longer pertinent.

F-4-49. Final EIR should discuss use of year 2010 and 2040 development estimates

The Final EIR includes such a discussion.

F-4-50. Final EIR should expand analysis of traffic impacts

The County feels that the Final EIR's traffic analysis is appropriate for a countywide general plan EIR.

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REFER TO FILE NUMBER

November 15, 1993

Hand Delivered
Mr. Fred Yeager
Director of Planning
Placer County
11414 "B" Avenue
Auburn, California 95603

Re: Placer County General Plan Update and Comments on Draft EIR

Dear Mr. Yeager:

We hereby submit the comments of Stanford Ranch, Inc. on the Countywide General Plan Update "Draft Policy Document" (DPD) and the associated draft environmental impact report (EIR). These comments amplify, but do not supersede, our oral comments made in testimony at public hearings. The draft EIR provides a sound data base for discussion of the General Plan Update and we believe it contains the comprehensive overview of impacts which is required under law. However, as with any draft document, the draft General Plan DPD and EIR are subject to revision and improvement. Following are our comments concerning both documents, with emphasis on how it relates to the Stanford Ranch West project:

Comments relating to the Countywide General Plan "Draft Policy Document"

1. The General Plan Policy Document - Comments

The General Plan Policy is divided into three parts; Part II on Page 3 is divided into ten sections. These ten sections omit any consideration of financial provision for the physical accomplishment of the plan when it is adopted, with the exception of the County being responsible for a "funding source." We strongly recommend that an Item Number 11 be added on Page 3 of Part II to the 10 points and be entitled "Financial

F-4-1

Feasibility" with the goal statement that would determine the private sector's financial capability of accomplishment of the General Plan. The statement that the agencies shall be responsible for funding sources does not address the realities of today's financial capability of the government sector.

F-4-1

**2. Stanford Ranch West - Development Standards-
General Comments**

Part III: The Development Standards for New Growth Areas are represented as specific plan areas and the development standards adopted for Stanford Ranch West are mandatory, specific and therefore contrary to normal General Plan criteria. This would provide sufficient grounds to find that almost any project will not be in conformance with the General Plan. These standards set quantitative limitations, both maximum and minimum, without any studies necessary to determine such numbers. All policy statements should be re-worded to remove "mandatory" wording.

F-4-2

Further, the limiting standards if adopted would diminish the specific plan process by determining the outcome of a specific plan prior to its submission and possibly eliminating the possibility of the project.

**3. Stanford Ranch West - Development Standards
Specific Comments**

The following comments relate to the specific Development Standards for Stanford Ranch West and are numbered to coincide with the numbers in the document.

1. Residential uses: Development should be planned to include a variety of residential uses and consider the physical site constraints.
2. Commercial and industrial uses: Such uses should be developed commensurate with the market demand, the physical site constraints and the actual number of acres for such uses shall be determined through the specific plan process.
3. Open space: Acreage to be provided over flood plains, wetlands and other natural features that would be concluded by a specific plan study, and conform to federal, state and county laws and ordinances.

F-4-3

4. Required buffers: Buffers should be provided to separate incompatible land uses. The width of such buffers shall be determined by the type of impact realized by such incompatible land uses. These distances should be determined in light of the topography, prevailing wind, drainage and other physical factors which should be site specific and should be determined through the specific plan process. (Reference is also made to my letter of the same date dealing in detail with this subject.)
 5. Transit: The provision for an express bus system initially should be deleted as economically infeasible, and the dedication of right-of-way corridors for future light rail transit should be studied.
 6. Urban design: The criteria and standards listed as Items A through J, inclusive, should strive to accomplish the goals contained therein. However, such goals should not be made imperative and where stated as "shall," be amended to read, "should be considered," to allow a variety of types of development.
 7. Phasing of Development should read, "The first phase of development should be adjacent to the proposed Town Center. Phasing should address necessary infrastructure and other relevant issues."
- Note: To build a town center in the first phase would be economically infeasible.
8. Agricultural water supply: Should be omitted as it is a requirement of the development to subsidize farming which has historically been a governmental undertaking.

F-4-3

4. New Growth Standards - Specific Comments

Further, under New Growth Standards (p. 23): The General Plan locks in the language of existing State Law and County Code. Changes by the Legislature or the Board related to Specific plans would not change the County General Plan. This section

F-4-4

should either be removed or modified to indicate that the General Plan will conform to State Law and amendments to County Code.

F-4-4

5. Transportation

The proposed Policy Section 3.A.7 (p. 51) increases Level of Service requirements for most roadway segments in the County. Complying with this policy will eliminate small developers who cannot pay the costs of endless traffic studies.

F-4-5

6. Agricultural Water Supply (p. 107, 7.D.6.)

This project will not generate reclaimed water if a regional sewer system is installed. A package plant with reclamation capabilities is unlikely due to the strict state discharge standards. Reclaimed water from a new Pleasant Grove Creek Wastewater Treatment Plan (proposed for 1999+/-) could supply 10+/- MGD to farmers.

F-4-6

7. Landfill

Landfill impacts which might affect Stanford Ranch West, have by virtue of the following documentation, been reduced to less than significant or nil.

The "Final Supplemental EIR for a Modification of the Solid Waste Facility Permit for the Western Regional Sanitary landfill," prepared for the Western Regional Sanitary Landfill Authority by the Placer County Department of Public Works, August 1991 states on Pages 2 and 3:

- A. "Traffic - Impacts can be reduced to a less than Significant level through adequate funding for maintenance and improvements on Athens Avenue and for regional improvement projects such as the Highway 65/Sunset Blvd. interchange."
- B. "Air quality - impacts can be reduced to a less than Significant level through implementation of the mitigation measures contained in the SEIR as well as enforcement of the State Minimum Standards by the County Local Enforcement Agency (LEA)."
- C. "Water quality - impacts can be reduced to a less than Significant Level through implementation of the mitigation measures contained in the SEIR as well as enforcement of the State Minimum Standards

F-4-7

and the Waste Discharge Requirements by the County LEA and the Regional Water Quality Control Board."

D. "Noise - Represents a Less than Significant Impact."

In addition to the mitigation measures set forth by Placer County Department of Public Works in the Landfill Supplemental EIR, the following statements relate to the compatibility of the landfill and neighboring uses.

- A. "... the proposed establishment, operation and maintenance of the use will not be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County." Placer County Dept. of Public Works Staff Report to the Placer County Planning Commission, p. 3, October 24, 1991, Item 5 - Findings of the Conditional Use Permit, Western Regional Sanitary Landfill Expansion (CUP - 1473/REA-818).

- B. Traditionally, approaches to identifying compatible land uses between sanitary landfills, waste-to-energy facilities, and residential development projects have included large, passive buffer areas of approximately 1,000 feet, or the gradation of land use intensity (i.e., industrial/commercial uses grading to residential uses away from the landfill). However, the combination of new technology, increasing land values, comprehensive planning, housing affordability, and supply and demand factors has outdated this "traditional approach" to making land use determination. The following research data indicates that well managed landfills and residential developments can coexist without significant passive buffer areas. pp. 4-5; Landfill - Land Use Compatibility Study, Anderson Consulting Group, June 13, 1991.

F-4-7

C. Research indicates that successful residential development has and can occur adjacent to landfills. When landfills are properly operated and well managed, developers work closely with landfill operators, and landfill operations are properly disclosed to homebuyers, land use compatibility can be achieved. Buffer areas are one of the measures used to relieve potential negative impacts of landfill operation. p. 6, Landfill - Land Use Compatibility Study, Anderson Consulting Group, June 13, 1991.

F-4-7

8. Transit services financed by new development.

In the planning standards for new growth areas on page 24, number 8, new development is being required to finance transit services to serve the project area. This could require each new project to pay for buses and operation of transit vehicles and the personnel to provide service to each project. This should be modified and clarified so that new projects should contribute their fair share for providing right-of-way, and paying no more fees than any other new home or project would be required to pay anywhere else in the County.

F-4-8

9. Protect and enhance existing industrial areas.

The proposed development of Stanford Ranch West will enhance the existing Sunset Industrial area, because of its close proximity. This should be clarified or modified so that new growth areas are not required to pay additional fees to enhance industrial areas that are not a part of the actual project.

F-4-9

10. Residential land use/Multi-family developments to provide private open space.

On page 34, paragraph 1.B.7, the County requires multi-family developments generally to include private open space for each dwelling. This is confusing and should be eliminated. Multi-family developments have specified densities and specific use permits which require review by the Planning Department. A literal interpretation of this would require that a multi-family developer could provide an occupant with a specific lot in some other part of the development. This condition is confusing and without definition.

F-4-10

11. County shall encourage new village centers to provide a variety of goods and services, both public and private.

In this instance, the County is now into the leasing and operation of village centers. How does the County expect to encourage leasing of village centers and commercial retail space? This type of prohibition could make it impossible to obtain financing for the retail developer and impractical to operate commercial retail centers. This paragraph should be eliminated in its entirety, or at least not made mandatory.

F-4-11

12. Economic development.

With regard to economic development, a new policy should be established that the County shall ensure an inventory of a variety of entitled property with infrastructure that is located close to major roads and suitable for new businesses to encourage and attract employment opportunities to our area. This inventory should include a variety of sizes of sites that allow the County to compete for both small and large users, and all types of acceptable uses, i.e. distribution, assembly, R&D, office, etc.

F-4-12

We have lost many new business and employment opportunities for our citizens because of our lack of suitable approved sites with infrastructure. This General Plan should set a policy to ensure Placer County is ready to accept new businesses.

Comments relating to the Draft Environmental Impact Report

1. The draft EIR overstates potential development.

A general plan is supposed to be an evolving document, which plans for projected changes over a *long-term* time frame -- many *decades* in this case. Thus, it must be understood that the extent of possible development discussed in the draft General Plan Update will not occur overnight, and many of the development projects may not occur at all in the time frame examined.

Projects may not be developed as assumed in the General Plan Update due to market conditions, due to future city and county actions to downzone certain areas which are currently designated for levels of growth now considered too high for those areas, and due to other factors. The extent of development discussed in the General Plan Update *significantly overstates the development which would be reasonably projected to actually occur in the future.*

F-4-13

A primary example of this overstatement of development is shown in Table 2-3 of the draft EIR which is a chart showing what is called the "Holding Capacity of the

General Plan." This chart indicates that 214,540 total dwelling units *could* be constructed in the unincorporated area of the County under the land use designations of the General Plan Update. But this high number of residential units is not a very useful guide for understanding what future conditions in the County will really be because, as we understand it, this calculation assumes that every property in the County will be developed at its maximum density. The EIR states at page 2-5: "The actual level of development at buildout, however, will not reach the theoretical holding capacity." Therefore, "holding capacity" is only a hypothetical concept which may be useful for planning but does not reflect actually expected environmental conditions, terrain, wetlands, the new proposed buffers, or the economic prospects for development of zoned agricultural and timberlands, all of which will significantly reduce the number of units that can actually be built.

New development projects are rarely approved at the maximum densities permitted under zoning and general plans because of various mitigation measures and project conditions which are applied during the project review process. The current EIR, for example, does not project the reductions in density expected from application of buffer policies, agricultural preservation policies, and other new stringent development standards. The assumption that Sutter Bay will be built out also appears highly questionable at this time. In addition, in-fill development in already-developed urban areas should not be expected to occur at maximum permitted densities because many homeowners prefer to keep their homes on lots much larger than minimum lot sizes, and development of multi-family units also may not occur at maximum densities for any number of reasons.

We suggest the EIR be revised to provide a projection, similar to the format of Table 2-3 of the draft EIR, which would project *the most likely development* expected in the County in the years 2010 and 2040 (the two years chosen for forecasts), in addition to the hypothetical maximum development now shown. The final EIR should then explain how various actual impacts could be lessened, and mitigation improved, under this projection of most likely development. The EIR should explain that the "worst-case" impacts projected under theoretical maximum development are not expected to actually occur. We know that as an example Stanford Ranch was initially approved in the Rocklin General Plan for approximately 11,400 units. It now appears that the actual build out will be closer to 8,400 units. This reduction of 26% is probably reflective of what will occur in the existing cities and the county, reducing the existing General Plan by close to 30%. The EIR should provide another table to explain and correct this misconception.

F-4-13

2. New growth areas will be subject to additional County review.

Enactment of the General Plan will not mean that a single new development has been approved. The General Plan provides a *generalized* overview of broad development patterns. Any development project of any significant size must undergo *its own* land use permit process, including public hearing before this Commission and the Board of Supervisors, before any actual development can be finally approved or actually commence construction. This fact is *especially true of the "new growth areas"* whose locations have been preliminarily identified in the draft General Plan Update. "New growth areas" -- including our own Stanford Ranch West project -- are slated to receive the designation of "*specific plan area*" on the General Plan Land Use Map. The text of the General Plan Draft Policy Document states that this map designation means that *each new growth area* must go through an *additional* thorough process to adopt a specific plan. *These specific plans* will be prepared in *separate* public processes, *after* this General Plan Update process is concluded.

F-4-14

3. New growth areas will be subject to further project-specific EIRs.

County review of "new growth areas" will require additional project EIRs for each development project in conjunction with preparation of each specific plan. The final EIR for the General Plan Update indicates (at page 4) that the General Plan Update EIR is intended to be a "*Program*" EIR and a "*Master Environmental Assessment.*" The consequences of these types of EIRs, according to the CEQA Guidelines (§ 15168(b)), is to allow the consideration of "broad policy alternatives and program wide mitigation measures at an early time" in the development of a program -- in this case the General Plan Update.

F-4-15

Where the General Plan Update EIR does not provide detailed description of new development, the Program EIR will have to be supplemented in a more detailed, project-specific EIR prepared when specific plans are proposed for the new growth areas. Similarly, a Master Environmental Assessment is essentially a data base which can be used in later EIRs to be prepared for new growth projects. The EIR for the General Plan Update should clarify that additional environmental review processes will be required for "new growth areas."

4. The alternatives analysis should be revised.

One improvement which should be provided in the EIR alternatives discussion is to clarify the comparison between the three project alternatives (Alternatives

F-4-16

"1," "2," and "3") and the suggested project -- which was earlier designated as "Alternative 5" in the "Issues and Options" process -- because it was developed after the initial three "Issues and Options" alternatives were identified. This should be done by expanding the chart entitled "Comparative Analysis of the Three Land Use Alternatives" contained in the draft EIR (beginning at page A-14) to include the proposed project. The chart could also be expanded to include a "no project" alternative corresponding to no changes in the General Plan. We also suggest that this chart be reformatted to track impacts in the order of the impacts sections of the EIR. The analysis should include a discussion of alternative or alternatives found to be "environmentally superior."

F-4-16

The alternatives section should be augmented in the EIR to include further discussion to explain in more detail each policy consideration which led the Board to identify "Alternative 5" as a possible project for this General Plan Update EIR. This augmented discussion should include citation and format incorporation by reference of key background documents into the final EIR. Although not required by CEQA to be included in an EIR, this expanded alternatives discussion should also include discussion of social, employment, and economic considerations which come into play in choosing among these alternatives in addition to purely environmental considerations.

5. General Plan mitigation policies should be clarified.

The EIR should include additional text explaining how the General Plan policies serve as mitigation measures and how these policies will be enforced.

F-4-17

6. The relationship between the General Plan Update and other adopted plans should be clarified.

The EIR should provide expanded explanation of how the General Plan Update is consistent with the Placer County Air Quality Plan, the general plans of cities with Placer County, and any other relevant plans.

F-4-18

7. Project objectives should be expanded.

The EIR and General Plan Update should be revised to more fully explain the project objectives (draft EIR p. 1-6) which led the Board of Supervisors to consider development of new towns (Issues and Options "Alternative 5") rather than other growth policies, beyond the stated objective to "balance growth by separating and individualizing population centers." Other objectives which should be added include the ability, through the master-planning of new towns, to start anew "from scratch" allowing new communities to be better designed for transit, jobs/housing balance, and for other amenities and

F-4-19

characteristics which cannot be as easily achieved where growth occurs incrementally and repeats the patterns and past mistakes of existing contiguous development.

With respect to short-term versus long-term uses, the EIR should also explain why it is important to complete an overall comprehensive framework for new growth and for new growth areas, rather than postponing such planning and instead allowing inevitable growth to be served by unplanned development dictated entirely by market forces. The impacts in 2010 are hypothetical based upon maximum buildout, and do not point out that in the alternative of buildout in the cities the impact could be the same or worse.

F-4-19

8. The Impact Summary should be revised.

This summary should be revised to identify Roseville impacts in a more detailed manner. (See, e.g., draft EIR pp. 4-19, 4-30, and 4-43.) In addition, the summary should also be revised to summarize the alternatives discussion and to describe the "areas of controversy" surrounding the General Plan Update.

F-4-20

9. The EIR should clarify that there is a surplus of industrial land.

The EIR should note that Stanford Ranch West needs to develop housing as well as industrial uses to obtain a more favorable jobs/housing balance, as stated in our companion letter specifically addressing buffers. In addition, it appears there may be a surplus of land designated for industrial uses under the current General Plan and Sunset General Plan. The EIR should address this issue and explain that a reduction in the amount of land designated for industrial uses is not an adverse impact if those lands were not needed for such uses. Coopers and Lybrand study indicated that 2,761 acres of industrial land would need to be converted to residential to achieve a jobs/housing balance. Additionally, the Board of Supervisors goal of having projects provide a jobs/housing balance is sound planning and more economically viable. In fact, mixed use projects may be the only way of ensuring an employment oriented development receives funding and gets built, assuring a viable economic development program.

F-4-21

10. The General Plan Update and EIR should defer mandatory imposition of buffers for new towns to the specific plan process.

As we have explained by separate letter, the new town buffers proposed by the General Plan and the landfill operators appear to have no logic or nexus to impacts

F-4-22

sought to be avoided and their application essentially prevent the development of most of the Stanford Ranch West property, raising significant "taking" without just compensation issues. In addition, it seems highly premature to state, and the DPD appears to do (page 19 appears to make the buffers shown in Figures I-1 to I-7 mandatory for new growth areas; page 135 specifically mandates application of the buffers to Stanford Ranch West), that the buffer requirements set forth in the DPD are mandatory and inflexible. The location of all other land uses concerning new towns except buffers is deferred to the specific plan process. Consequently, the mandatory location of buffers should also be deferred. It is short-sighted to foreclose later flexibility in mandatory buffers. Adoption of the proposed mandatory buffers would place Stanford Ranch West in the position of immediately seeking a General Plan Amendment and/or instituting inverse condemnation litigation because application of the buffers would effectively prevent any reasonable development of the property.

Therefore, we strongly urge that the DPD be revised (including pages 19 and 135) to state that buffers are shown only as "guidelines" which must be *considered* in the specific plan processes for "new growth areas." The DPD should also make clear that establishment of actual buffers for each new growth area shall be determined in the specific plan process, where a nexus is shown for the buffer and with flexibility provided for differing circumstances.

We urge that certain buffer concepts be fundamentally reconsidered. As we indicate in our prior letter, it is inappropriate to require private land to serve as a buffer *for the benefit of* the Landfill. In addition, there is no rational policy justification for requiring the entire "Urban Separator Buffer" to be located *within* a new town development. Agricultural land which is protected by zoning and general plan designations and which abuts (but is not within) a new town project should be permitted to be utilized to form part of any required urban buffer. It is unfair, illogical, and constitutionally-suspect to place the entire burden of creating urban open space buffers between existing cities and new towns upon those new towns, when the cities have not created similar buffers within their borders.

11. The previously adopted Housing Element is not at issue now and new town housing issues can be reviewed in new town EIRs.

The EIR should explain that the Housing Element was previously adopted and not part of the present General Plan Update process. Any legal challenge to the Housing Element, such as the request for additional analysis of the effects of fee waivers

F-4-22

F-4-23

would be barred by the statute of limitation under the Government Code. The EIR should explain how creation of new town areas require no changes to the Housing Element and new town housing mitigation can be addressed in the specific plans and EIRs which will be prepared for those projects.

F-4-23

12. The feasibility of a bypass road linking the new growth areas to I-80 should be examined.

The final EIR should discuss feasibility of a bypass road connecting new growth areas in South Placer County with I-80. If such a highway is found infeasible, the final EIR should explain why. If it is found feasible, impacts should be reconsidered to determine whether such a bypass road would mitigate traffic impacts on roads within Roseville.

F-4-24

13. The EIR should consider whether growth in South Placer County, in lieu of growth in Roseville and Rocklin, would reduce congestion on I-80 and Highway 65 as suggested by the comments of PVA.

Although it seems obvious that growth in South Placer County in lieu of growth in Roseville and Rocklin would reduce congestion on certain segments of I-80 and Highway 65, the addition of the Fehr and Peers traffic study to the record should provide additional useful evidence to help the decision maker arrive at an environmentally-informed decision. To that end, a copy of the traffic study performed for PVA by Fehr and Peers is submitted herewith for inclusion in the EIR record.

F-4-25

14. The County should review the list of "mistakes" that were noted in the City of Roseville's comments.

Although minor mistakes do not affect the "good faith effort" required by CEQA for an agency's EIR, the County should consider the list of "mistakes" underlying the draft EIRs traffic analysis that were associated in the City of Roseville's comments and, to the extent that any corrections lead to significantly different results, revise the analysis accordingly.

F-4-26

15. The EIR should recommend feasible additional mitigation to reduce traffic impacts in the City of Roseville.

Because the mitigation measures listed in the draft EIR may not reduce the impact of traffic to an acceptable level on certain roads in Roseville, the final EIR should

F-4-27

give general consideration to additional mitigation, even if under the jurisdiction of Roseville and not the County, or explain why none are feasible or available. One such measure is the bypass road referred to in item 12 above, which Roseville has already suggested. Alternatives could include additional transportation management policies, trip reduction ordinances, etc. that could be developed by 2010.

F-4-27

- 16. The final EIR should clarify which mitigation measures are required to substantially lessen the effects of traffic at or near ski resorts.

F-4-28

It is unclear from the draft EIR discussion whether confining traffic to ski area parking lots and metering it out is concluded to be sufficient, by itself, to mitigate ski traffic impacts, and whether the other suggested measures are also proposed or were merely suggested as alternative measures.

- 17. The final EIR should explain the meaning of Levels of Service F1, F2, F3.

F-4-29

Table 4-19 lists Levels of Service (LOS) from A through F. Tables F-13, -14, -15, and -17 do not define LOS F1, F2 or F3. A definition of these terms would be helpful.

- 18. The final EIR should clarify the impacts of the General Plan implementation on transit.

F-4-30

The City of Roseville questions the conclusion that with effective implementation of General Plan policies, there will be a "less than significant" impact on transit services. Obviously, implementation of transit services depends in part upon future state and federal funding. If such funding is not forthcoming, transit services may not develop as rapidly as hoped and traffic and air quality impacts may be worse as a result. The final EIR should clarify this issue.

- 19. The final EIR should articulate specific, substantive measures proposed to achieve the average vehicle ridership (AVR) goal.

F-4-31

The final EIR should specify substantive measures capable of achieving the goal, or recognize that the air quality and traffic impacts may be further affected if AVR goals are not met. Such measures are, presumably, already under consideration through the Placer County Air Quality Plan. Also, as with Transit, the draft EIRs discussion of TSM forecasts less-than-significant impacts, but does not describe the "impacts" referred to.

20. The final EIR should recognize that impacts on air quality and traffic will be affected if draft EIRs assumptions regarding future levels of nonmotorized transportation are not realized.

The draft EIR does not identify the "effects" that are found to be less-than-significant with respect to nonmotorized transportation. Stated mitigation measures (policies) amount to open-ended, non-specific actions such as "promote," and "pursue." The final EIR should articulate specific, substantive measures capable of achieving the goal, or recognize that air quality and traffic impacts may be further affected unless all assumptions regarding future facilities are realized.

F-4-32

21. The final EIR should explain exactly what the "goods movement" environmental analysis consists of, and why it is separated from or not considered in the air quality and traffic analyses.

As with Transit, the "effects" that the General Plan will not significantly impact are unstated. These effects need to be expressed in more meaningful terms such as an increase or decrease of delay, costs, and/or capacity. Similarly, the final EIR should explain whether impacts on nonmotorized transportation were also considered under the air quality and traffic, and if not, why not. Also, the final EIR should recognize that the impacts on air quality and traffic will be further affected if the stated policies, express in terms of "promote," "encourage," and "investigate," are not effective.

F-4-33

22. Water supply analysis will be provided in later EIRs.

The Board of Supervisors has no real control over water supplies, they are controlled by the Placer County Water Agency and other public and private water agencies. Most surface water supplies originate from supplies controlled by the United States Bureau of Reclamation, PG&E, and the Nevada Irrigation District. Water supplies for new growth areas will be discussed in detail in the respective EIRs for these areas, and therefore projects to increase water supplies will be the subject of EIRs prepared by the water supply agency proposing the project.

F-4-34

The EIR should include a general discussion of potential impacts which might result from creation of a new water transmission corridor to new growth areas, while recognizing these impacts will necessarily be discussed in detail in new town EIRs. In addition, the EIR should explain that impacts upon "water supply" are generally expected to be mitigated by General Plan mitigation policies, although it is possible impacts associated

with developing new supplies may be significant and will be addressed in EIRs for water supply projects.

F-4-34

23. Specific wastewater system impacts are strictly regulated and will be addressed in connection with wastewater projects.

Wastewater discharge issues are highly complex and mitigated on a project-specific basis. Future major county development, such as new town proposals, will be subject to their own environmental review processes and will require analysis of any increases in wastewater discharge. Significant discharges may, in addition, be subject to permit approval or review by regional and state water quality boards and/or EPA. Because the quality of wastewater discharges is strictly regulated by these agencies through regulatory standards intended to protect human health and the environment, there is no reason to believe that wastewater discharge impacts would be significant, and in fact could provide a source of irrigation water for crops and recreational open space.

F-4-35

24. Solid waste issues should be resolved in the upcoming Integrated Waste Management Plan.

Preparation of the upcoming Integrated Waste Management Plan should be referenced in the EIR even though the County may give its preliminary view of a joint facility in its response to comment. Whether new towns will affect the landfill will be addressed in the project-specific EIRs prepared for any new towns. The landfill, as the source of its impacts, should be responsible for providing mitigation and any necessary buffer for those impacts within its own borders. Requiring Stanford Ranch West, which is the potential victim of landfill impacts, to dedicate land as a nuisance buffer purely for the *benefit of the landfill* could constitute a Fifth Amendment taking, requiring just compensation for the loss of use of the property. (See *Twain Harte Associates Ltd. v. County of Tuolumne* (1900) 217 Cal.App.3d71, where the court of appeal remanded for trial a taking suit arising where the county sought to impose a 1.7 acre buffer upon and 8.5 acre shopping center.)

F-4-36

25. Although beyond the scope of CEQA, the public facilities discussion should be revised to reach conclusions on financial impacts.

Financial impacts on public services are beyond the scope of the analysis required in the EIR. (See CEQA Guidelines § 15131.) Nevertheless, it might be useful to include in the final EIR an indication of whether these financial impacts will be fully

F-4-37

mitigated by self-mitigation policies of the General Plan or if funding is needed from outside sources, which may or may not be available. Where shortfalls in service funding are due to existing fiscal problems and not due to demands created by new development should be clearly stated. The EIR should also formally incorporated by reference the document entitled *County Facilities Needed to Serve Growth* (released in draft form for public comment in September, 1993).

F-4-37

26. Although beyond the scope of CEQA, the school impacts analysis proffered by a comment should be adopted as revised.

While not an environmental issue, the EIR should accept the impact analysis on schools provided in comments by the Placer County Office of Education, with such revision in the analysis as the County finds appropriate.

F-4-38

27. Although beyond the scope of CEQA, the referenced General Plan "Policy Responses" concerning facilities and services should be expanded.

Again, although a non-environment issue, the list of policies appearing in draft EIR § 6.5 should be expanded to include additional mitigating policies including "Law Enforcement," "Fire Protection Services," any schools mitigation reference, and any other relevant General Plan policies, considering that if population projections are accurate the alternative will answer a different where, not a different number.

F-4-39

28. Although beyond the scope of CEQA, the EIR should respond to the City of Roseville comments concerning use of city services.

The EIR could respond to impacts of new towns upon Roseville libraries, parks, and other services should new town residents use those city services. The response should properly indicate that these issues will be dealt with in detail during specific plan processes required to approve new towns. The final EIR for the General Plan should explain how self-mitigating Policies of the General Plan will assure the services in new towns will at least be equivalent to Roseville city services, so that use of city services by new town residents would not be expected.

F-4-40

29. The comments requesting mitigation of archeological impacts of new towns at the general plan stage should be rejected as premature.

If such mitigation was actually imposed, it would effectively prevent completion of the General Plan because of time and expense involved in surveying vast areas. Only 18% of the county has been field-surveyed to date. (Draft EIR at p. 7-7.) See *Society for California Archeology v. County of Butte* (1977) 65 Cal.App.3d832.838, rejecting any blanket requirement for archeological studies. The EIR (including § 8.7 of the Background Report) constitutes a good faith effort to disclose all information known concerning county-wide archeological sites which can reasonably be expected to be reviewed in making General Plan decisions. Moreover, "General Policies" 5.D.6 and 5.D.7, which will be applied in mitigating the impacts of new growth areas when their respective specific plans are reviewed, provide effective mitigation for archeological impacts. If the County find it advisable, those policies should be clarified to state that field surveys will be required in connection with new town specific plan applications where it appears that the new town likely includes significant archeological resources.

F-4-41

30. The EIR may prematurely find significant impacts due to agricultural lands conversion.

The EIR (At page 8-13) finds that there will be unavoidable impacts upon prime agricultural land and high-value fruit and nut production due to development of new towns. This analysis fails to consider the possibility that later EIRs for new towns and other large size development projects may identify additional feasible mitigation measures to protect high quality agricultural land and land having high production values. For example, it can be calculated from data on Table 8-4, page 8-10, that preservation of 1,408 acres of orchards would save over \$2 million in fruit and nut crop production, almost half of the production projected to be lost. Whether it is feasible to preserve some or all of these 1,408 acres can be addressed in project-specific EIRs prepared for development projects, but that decision cannot reasonably be made in a county-wide General Plan process. In addition, the discussion in the draft EIR fails to consider certain benefits resulting from conversion of agricultural land, such as potential water supply savings due to cessation of rice production. The project specific EIR will evaluate the specific agricultural land to be converted, and should consider the total employment and tax basis to the county.

F-4-42

A more accurate conclusion in the General Plan update EIR might be that significant impacts could occur if additional feasible mitigation measures are not developed in project-specific reviews, but that mitigation measures to protect specific parcels of

agricultural land cannot be developed in a general plan context and instead must be addressed at the project level. In particular, the new town EIRs may be expected to develop additional mitigation of the highest quality agricultural lands resulting in lesser impacts than the necessarily gross analysis provided in the General Plan EIR. The new town EIRs will also consider on a parcel-specific basis trade-offs and any overriding consideration which may justify development of some high quality agricultural land.

F-4-42

31. Certain comments requesting additional mitigation for water resources, agricultural land, vegetation and wildlife, air quality, flood, and noise impacts are premature.

In various other comments, the City of Roseville asks for additional assurances of mitigation from various potential new town impacts. Roseville asks for additional mitigation to assure that runoff from new growth areas will not adversely affect Roseville streams, more discussion of wildlife and vegetation impacts, incorporation of "TCM" measures from the Air Quality Plan, additional analysis of impacts on various streets. These comments fail to recognize that the EIR contains a broad but adequate county-wide overview analysis of each of these issues, consistent with what can reasonably be accomplished in the General Plan Update process. Each of these impacts raised by Roseville is more susceptible to further meaningful analysis and project-specific mitigation when the various EIRs are prepared for the new towns and other large development projects. As but one example, because the new towns will be planned "from scratch," certain TCM measures may be feasible for the new town although not feasible county-wide.

F-4-43

Some of Roseville's concerns about impacts may have been unnecessarily heightened by statements in the draft EIR that certain impacts are significant even after consideration of General Plan mitigation Policies. (See e.g., discussion of land use at page 3-6, housing at page 3-12, agricultural land conversion at pages 8-12 to 8-13, habitat conversion at page 8-33, and air quality at page 8-39.) The final EIR should explain that in each specific plan process, the project-specific EIR will be required to first address the General Plan mitigation Policies. However, if those policies do not reduce impacts to levels of insignificance, the CEQA would require that the project EIRs must identify *additional* feasible mitigation measures in an attempt to avoid impacts. Until this project-specific mitigation is accomplished, the true extent of lessening of impacts cannot be fully determined and the General Plan EIR has probably overstated many impacts for this reason.

32. The EIR contains an adequate discussion of cumulative impacts.

The overall discussion of county impacts at build-out of the General Plan provides a much more useful description of cumulative impacts than does a list of known short-term future projects, as long as the analysis reflects *reasonably expected* build-out rather than theoretical maximum build-out. List analysis is typically done in a project-specific EIR because it is not feasible or reasonable on a project level to provide the broader cumulative analysis resented in the General Plan Update draft EIR. The "*Either*" cumulative impacts approach is authorized by CEQA Guidelines § 15130(a)(1).

F-4-44

33. The General Plan's mitigation "Policies" constitute the mitigation monitoring program for a general plan.

The General Plan is self-mitigating through its mitigation "Policies" which have been circulated for review and comment in the draft DPD. The adoption of these mitigation Policies, coupled with their specific application to specific development proposals as they are subsequently reviewed by the County, constitutes the type of mitigation monitoring program reasonably contemplated by CEQA for a county-wide general plan revision.

F-4-45

34. The General Plan Update is internally inconsistent.

The County must, in the General Plan process, plan for a variety of different uses. Inherent in the planning process is inevitable conflict between policies to further each of the various land uses where there is not an unlimited supply of land. The present General Plan Update is non-specific concerning where various types of land uses should be located *within* new town areas. The specific land use policy determinations concerning new towns -- such as whether Stanford Ranch West should include more or less industrial land -- should properly be addressed in the specific plan review process for that new town, rather than in a county-wide General Plan.

F-4-46

35. Stanford Ranch West should be designated for removal from the Sunset General Plan area.

The DPD (at page 4-5) and EIR (Table 1-2, page 1-8) incorrectly assumes that the Sunset General Plan will not be revised. However, the Sunset General Plan includes much of the Stanford Ranch West property and designated the property solely for agricultural and industrial uses, rather than the mixed residential/commercial/industrial uses anticipated in the General Plan Update. The DPD and EIR should be revised to state that the

F-4-47

Sunset General Plan boundaries will be modified to delete Stanford Ranch West, so that the entire project is designated to be in a new specific plan area. (We note this was done for "Dry Creek/West Placer Community Plan" on Table 1-2 of the draft EIR.) Ancillary to adoption of the General Plan Update, the Board of Supervisors should so amend the Sunset General Plan's boundaries.

F-4-47

36. A greater rate of growth for new development areas should be considered.

In projecting impacts, the EIR apparently assumes that Stanford Ranch West and other new growth areas will only be built out 20% in the year 2010 and 80% by the year 2040. (See pages 2-8 and 4-3.) This assumption is incorrect. Stanford Ranch West projects 50% build-out by 2010 and 95% build-out by 2040. Moreover, because of the greater opportunity to avoid many impacts in master-planned communities, it would seem that assuming a high build-out for the new growth areas with a corresponding slower build-out in other areas might show overall lesser impacts from the General Plan Update.

F-4-48

37. The EIR should explain whether it is possible to quantify year 2040 impacts.

Some sections of the EIR quantify year 2040 impacts, while others do not. Sections which do not quantify year 2040 impacts include transit at page 4-55, water quality at page 8-3, groundwater at page 8-5, agricultural lands at page 8-10, agricultural production at page 8-11, forest land production at page 8-15, mineral resources at page 8-19, natural habitats at page 8-27, and air quality at page 8-37. It is extremely speculative to provide quantitative projections for these impacts in the year 2040. The EIR should indicate why that is the case. Where such projections can reasonably be provided, however, they should be included in the final EIR.

F-4-49

38. The EIR should include additional traffic mitigation discussion.

In the summary at page 1-10 (see also page 4-39), the EIR finds that there are no feasible mitigation measures available to reduce year 2010 traffic impacts upon freeways and state highways. This conclusion may be unwarranted, because a number of potential freeway and high way mitigation measures are briefly identified which might result in additional mitigation. Further analysis should discuss the ability to implement the

F-4-50

additional mitigation measures for freeways and state highways and could offer a conclusion concerning remaining impacts after such implementation.

The traffic improvements list at Table 4-3 indicates a cost of \$195,527,000 to provide needed road and highway improvements for the year 2010 for which funding is expected to be "assured." Table 4-4 lists additional roadway improvements needed for the year 2010, without cost estimates or funding mechanisms described. These costs should be estimated and availability of funding (see page 4-39) should be more completely discussed.

Traffic impacts for the year 2040 are quantified and appear to be large. (See Tables 4-24 and 4-25.) However, this analysis fails to include more than a nominal discussion (at page 4-40) of the mitigation measures which may be available to avoid these impacts. A full analysis would discuss the mitigation provided by potential street-widening and other potential mitigation measures and could contain a table analogous to Table 4-25, showing projected conditions after mitigation in the year 2040.

F-4-50

Conclusion

On behalf of our client, Stanford Ranch, Inc., we would like to thank you for the opportunity to participate in the General Plan update process. We look forward with great anticipation to your review and comment upon the contents of this letter and invite you to contact either myself or Stanford Ranch, Inc. to discuss any of the issues set forth herein.

Very truly yours,

Thomas W. Eres/ja

Thomas W. Eres
of Nossaman, Guthner, Knox & Elliott

cc: Larry D. Kelley
S. Shulman
Marc Benezra

TWE/jla

F-5 Palisades Development, Inc (11/15/93)

- F-5-1. Agricultural development, specifically rice growing, is only marginally viable on commentor's property

Comments noted; no response necessary.

- F-5-2. *Draft Plan* policy requiring development in new growth areas to assist with agricultural irrigation water should be changed to include reclamation and be stated as a cooperative effort

Comment noted; the referenced policy is based on the descriptions provided to the County by the proponents of projects in the new growth areas. The County feels that this policy represents an appropriate interpretation of the Board of Supervisors' directions regarding the preparation of the Draft Policy Document.



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PLANNING DEPARTMENT
November 15, 1993

Mr. Frederick Yeager
Planning Director
County of Placer
11414 B Avenue
Auburn, California 95603

Re: Comments Pertaining to the Placer County General Plan

Dear Mr. Yeager:

On behalf of the Placer 2780 partnership, please accept this letter as its comments regarding both the Draft Policy Document of the Placer County General Plan and the Draft EIR for the proposed General Plan.

There are many planning benefits of creating "new towns." These benefits are described at length in a recently published book entitled, "The Next American Metropolis: Ecology, Community, and the American Dream," written by architectural planner Peter Calthorpe. We have submitted that book as Exhibit A to this letter, so that it will be made part of the administrative record for the Board's upcoming decision on the proposed General Plan.

SECTION 7: AGRICULTURAL AND FORESTRY RESOURCES (pp. 103-109)

The issue of agricultural productivity on lands in the "new growth areas" identified on the Land Use Diagram has been the subject of much spirited discussion. *Our comments on this subject are limited to our property.* Our comments therefore do not pertain to other agricultural areas in the County. Agricultural productivity must be evaluated objectively and on a property-by-property basis. Some lands in Placer County might be well-suited for agriculture, while others may not.

Our 2,780 acre property located within the proposed West Placer Specific Plan Area currently has approximately 600 acres (22%) in agricultural production. All are on Class IV Soils, which the U.S. Department of Agriculture ("USDA") and the Soil Conservation Service ("SCS") classify as "poorly suited for agriculture." One of the few crops that may be grown on Class IV Soils is rice. Rice

F-5-1

Mr. Frederick Yeager
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yields on our property are approximately 64 sacks per acre, while yields in other areas of Placer and Sacramento County are in excess of 80 sacks per acre. Our crop yields are verified by the Placer County Agricultural Commissioners office and Placer County Agricultural Stabilization and Conservation Service.

The profit margin for rice grown on our Class IV Soils is small. If cultivation costs are held constant, the greater the sack yield per acre, the greater the profit margin. Our Class IV Soils may yield some rice; but whether there is "economic viability" for rice on our property is a function of U.S. Government subsidies and the cost of pumping water. If the Federal Government eliminates rice subsidies, or the electric cost for pumping water exceeds \$20.00 per acre foot, or there is an overdraft of the water table resulting in a lack of available water, any small profit for rice farming on our land will be eliminated.

F-5-1

AGRICULTURAL WATER (p. 107)

7.D.6. "The County shall require that development in new growth areas assist in the delivery of surface water to agricultural areas in Western Placer County."

We feel that a stronger case may be made for the use of reclaimed water to assist in irrigating farmlands in Western Placer County. Please consider deleting that policy in favor of one reading as follows:

F-5-2

"The County shall coordinate the efforts of the Placer County Water Agency (PCWA), the Regional Wastewater Treatment Plant Authority (for use of reclaimed water), and the project proponents and landowners in new growth areas to assist in providing delivery of surface and reclaimed water to agricultural areas in Western Placer County."

Sincerely,


Nick Alexander
Project Manager

NA/kvd

Attachments: Exhibit A:
The Next American Metropolis

F-6 Placer Villages (11/15/93)

F-6-1. *Draft Plan* ag/timber buffers should consider depth-to-width ratio

The County feels the Policy Document's buffer standards and policies are appropriate as drafted.

F-6-2. *Draft Plan* sensitive habitat buffers may be extreme

Refer to response to comment F-6-1.

F-6-3. *Draft Plan* public facility buffers should be commensurate with magnitude of potential impacts

Refer to response to comment F-6-1.

F-6-4. *Draft Plan* urban separator buffer standard is infeasible

The urban separator buffer standards, to which this comment refers, have been removed from the Policy Document.

F-6-5. *Draft Plan* should designate Baseline Road to 99 as a transit corridor; consider transit zone policy

Comment noted; no change has been made to the Policy Document.

F-6-6. *Draft Plan* public facility buffer policy (1.B.4) should be flexible

Refer to response to comment F-6-1.

F-6-7. *Draft Plan* should define private open space as used in policy 1.B.7

The Policy Document includes a revised version of the referenced policy that clarifies its intent.

F-6-8. *Draft Plan* agricultural buffer policy (1.G.6) should be modified

Refer to response to comment F-6-1.

F-6-9. *Draft Plan* policy 1.H.2 should be modified to accept off-site mitigation to allow creation of habitat corridors

The recommended modification has been made in the Policy Document.

F-6-10. County should consider policies that streamline permit process and consider using Master EIRs for new growth areas

Comment noted; no change has been made to the Policy Document.

- F-6-11. Adopted Housing Element is presumptively legally adequate for purposes of Update; existing community plans should be made consistent

Comment noted; no response required.

- F-6-12. Proposed additional policy relating to relieving traffic impacts in Roseville

Comment noted; the recommended change has not been made to the Policy Document.

- F-6-13. Proposed additional policy relating to regional transportation corridors

The recommended modification has been made in the Policy Document.

- F-6-14. General Plan should stress use of reclaimed water to reduce demand for potable water

The Policy Document includes a policy promoting use of reclaimed water.

- F-6-15. Public facilities financing schemes should recognize levels of entitlement resulting from General Plan adoption

Comment noted; no response required.

- F-6-16. Proposed additional implementation measure relating to development near landfill

With removal of the Stanford Ranch West Specific Plan Area from the Land Use Diagram, the concerns expressed in this comment are no longer pertinent. Refer also to common response #6.

- F-6-17. Proposed revision of *Draft Plan* policy 4.J.11 relating to timing of school construction

Refer to common response #7.

- F-6-18. Proposed revision of *Draft Plan* policy 4.J.16 relating to Sierra College

The County does not feel the recommended revision is appropriate.

- F-6-19. *Draft Plan* policy relating to park standards should identify what types of open space will satisfy standards

The Policy Document has been revised to more clearly define "open space" as it pertains to the park and recreation standards of the General Plan.

- F-6-20. Recommended types of uses that should receive open space park credit

Refer to response to comment F-6-19.

F-6-21. *Draft Plan* sensitive habitat buffers may be extreme, so policy 6.A.1 should be modified accordingly

The referenced policy has been modified to more clearly convey its intent and to establish consistency with the buffer standards in Part I of the Policy Document.

F-6-22. *Draft Plan* policy 6.A.4 item (f) relating to creek corridor maintenance is unnecessary

The County disagrees; the referenced policy has nonetheless been modified to improve its clarity.

F-6-23. Proposed revision of *Draft Plan* policy 6.B.5 relating to habitat

The referenced policy has not been changed; refer also to response to comment F-6-9.

F-6-24. Proposed revision of *Draft Plan* policy 6.C.1 relating to "critical" habitat

The referenced policy has been modified to provide a clear definition of critical habitat.

F-6-25. Proposed revision of *Draft Plan* policy 6.C.9 relating to riparian habitat

Comment noted; no change has been made to the Policy Document.

F-6-26. *Draft Plan* policy 6.C.10 recommended use of WHR suggests that WHR system should be incorporated by reference

The County does not feel such incorporation by reference is necessary.

F-6-27. Proposed revision of *Draft Plan* policy 6.C.11 relating to development in significant ecological resource areas

The Policy Document has been revised to more clearly define what constitutes significant ecological resource areas.

F-6-28. Proposed revision of *Draft Plan* policy 6.E.1 relating to preservation and enhancement of natural areas

Comment noted; no change has been made to the Policy Document.

F-6-29. Commentary on agricultural productivity of soil in Placer Villages new growth area

Because the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram, this comment is no longer pertinent.

F-6-30. Recommended revision to *Draft Plan* policy 9.A.10 item (b) relating to acoustical analysis

Comment noted; no change has been made to the Policy Document.

- F-6-31. *Draft Plan* development standard #3 for Placer Villages should add greenways within powerline easements as allocatable open space

Because the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram, this comment is no longer pertinent.

- F-6-32. *Draft Plan* development standard #3 for Placer Villages should be non-specific regarding amount of open space

Because the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram, this comment is no longer pertinent.

- F-6-33. *Draft Plan* development standard #3 for Placer Villages should define the type of open space satisfactory for park credit

Because the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram, this comment is no longer pertinent.

- F-6-34. *Draft Plan* development standard #4 for Placer Villages should reflect comments F-6-2 and -3 regarding buffers

Because the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram, this comment is no longer pertinent.

- F-6-35. Proposed revision *Draft Plan* development standard #9 for Placer Villages regarding noise from McClellan AFB

Because the Placer Villages Specific Plan Area no longer appears on the Land Use Diagram, this comment is no longer pertinent.

- F-6-36. *Draft EIR* generally satisfies statutory and case law requirements for EIRs

Comment noted; no response necessary.

- F-6-37. Self-mitigating approach used in *Draft Plan* and *Draft EIR* is appropriate

Comment noted; no response necessary. Refer also to common response #2.

- F-6-38. *Draft EIR* project objectives statement is legally adequate, although it should be more detailed

Comment noted; the statement of project objectives has been modified in the Final EIR.

- F-6-39. *Draft EIR* impact summary conclusion regarding loss of farmland should be reconsidered

While the County understands that actions that might result from adoption of the General Plan would not lead directly to the conversion of agricultural land, the EIR provides accurate conclusions regarding the possible long-term effects of development, including agricultural land conversion as a result of subsequent project and plan approvals. The quality of the land being converted will be specifically addressed in EIRs related to these projects and plans.

F-6-40. Commentary regarding *Draft EIR's* discussion of holding capacity

Comment noted; no response necessary.

F-6-41. Commentary regarding southwestern Placer County's relationship to projections for Sacramento Metropolitan Area

Comment noted; no response necessary.

F-6-42. Southwest Placer County is a logical and natural area to accommodate regional growth demand over next 20 years

Comment noted; no response necessary.

F-6-43. Land "supply margin" is a good thing

Comment noted; no response necessary.

F-6-44. Adopted Housing Element is presumptively legally adequate for purposes of the General Plan Update

Comment noted; no response necessary.

F-6-45. *Draft EIR's* voluntary treatment of housing cannot be legally challenged

Comment noted; no response necessary.

F-6-46. Final EIR should refer to additional policy relating to relieving traffic impacts in Roseville proposed under comment F-6-12

Refer to response to comment F-6-12.

F-6-47. Commentary regarding beneficial traffic impacts related to development in new growth areas versus in cities

Comment noted; no response necessary.

F-6-48. Commentary regarding water supply and wastewater treatment

Comment noted; no response necessary.

F-6-49. Drainage from Placer Villages will flow away from Roseville

Comment noted; no response necessary.

F-6-50. Final EIR should recognize benefit of off-site mitigation to allow creation of habitat corridors as suggested in comment F-6-9

Refer to response to comment F-6-9.

F-6-51. Internal design of Placer Villages will promote non-polluting transportation, therefore air quality impacts will be beneficial

Comment noted; no response necessary.

F-6-52. Draft EIR noise information for McClellan AFB may be based on obsolete assumptions

The Background Report has been revised to incorporate up-to-date information on noise from McClellan operations; the Final EIR discussion references this updated information.



November 15, 1993

Frederick Yeager
 Planning Director
 Loren Clark
 Senior Planner County of Placer
 11414 B Avenue
 Auburn, California 95603

Re: Comments on Placer County General Plan

Dear Mr. Yeager and Mr. Clark:

On behalf of the property owners in the proposed West Placer Specific Plan Area, please accept this letter as our comments regarding both the Draft Policy Document of the Placer County General Plan and the Draft EIR for the proposed General Plan. The first section provides our thoughts regarding the substantive elements of the proposed Policy Document. The second portion of the letter constitutes comments on the Draft EIR.

Within the first section, I have composed our comments so that they address issues in the same order that they appear in the Draft General Plan Elements prepared by County Staff and consultants. For ease of reference, I have included specific page references to the relevant sections in the Policy Document. Where appropriate, I have suggested alternative policy language for the County to consider.

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COMMENTS ON THE DRAFT GENERAL PLAN POLICY DOCUMENT

PART 1: LAND USE / CIRCULATION DIAGRAMS AND STANDARDS

AGRICULTURAL / TIMBERLAND BUFFERS (p. 19)

If one-acre ranchettes are to be used as buffers, the County should consider an appropriate "depth to width ratio." We suggest that an appropriate depth to width ratio for a one-acre parcel (as allowed by the Board of Supervisors) would be 2.3 to 1. This ratio should create rural residential lots that could realistically serve as buffers yet will also pay their fair share of frontage improvements. This means that deeper lots with narrower frontage allow for wider buffers and spread the cost of frontage and infrastructure improvements over a greater number of parcel owners.

F-6-1

SENSITIVE HABITAT BUFFERS (pp. 20-21)

In general, we are concerned that the Proposed General Plan contemplates the use of buffers that will be excessive and will not create benefits commensurate with the burdens placed on property owners. With these general sentiments in mind, please consider including the following language within the General Plan on the subject of Sensitive Habitat Buffer Zones:

"Buffer zones shall be established where feasible for valuable habitat, including riparian woodland, wetlands, and other preserved habitat, to ensure there is adequate space between natural areas and urban development to maintain the integrity and continuity of the riparian zone or woodlands. The size of these buffer areas will depend on habitat value, protection needs, vegetation, flooding issues, topography, and the degree, if any, to which the creation of buffer areas will affect the feasibility of development. Where the creation of buffer areas will jeopardize a landowner's ability to feasibly develop the affected property, the County may waive or reduce the buffer area requirement to the extent necessary to allow development to feasibly proceed."

F-6-2

PUBIC FACILITY BUFFERS (p. 21)

The size of Public Facility Buffers must be commensurate with the magnitude of potential impacts. We are concerned that, in the Draft General Plan as currently proposed, the size of such buffers is excessive.

F-6-3

For example, the Western Regional Sanitary Landfill exists on approximately 480 ± acres. Should the County impose a one mile buffer, it would encumber an area of over 5,000 acres, over five times the acreage of the landfill! We believe that the County should further consider

the use of *internal* buffers *within* the landfill. It is not uncommon for a public facility such as a landfill to contain acres of surrounding public land that constitute an internal buffer.

Under the current proposed language, we cannot tell whether the radius of the buffer for the landfill will be measured from the actual public facility itself, as is apparently intended to be the case with airport runways and wastewater treatment plants, or from the public facility property line. Achieving clarity on this issue is very important. If the County is inclined to require some substantial buffer around the landfill, we would of course prefer that the measurement start at the facility itself, not at the property line.

In support of our view that the proposed public facility buffers are generally excessive, we would point out that, in a General Plan contemplating land uses that may not be built for nearly fifty years, the County might want to consider adopting a policy that will be flexible in the future, in the event that technological advances reduce or even eliminate entirely the need for buffers around public facilities.

For example, the construction of the proposed Materials Recovery Facility ("MRF"), by removing recyclable material from the waste stream, may reduce the amount of land area needed for landfill operations. Future landfill equipment may also reduce the noise associated with scrapers, bulldozers, and other current noise sources. Technology may also reduce problems associated with dust, noise, and odors. In other words, in twenty years landfills may be much "better neighbors" than they have been in the past.

F-6-3

Similar advances may reduce conflicts associated with locating development near airports and treatment plants. In the future, airports--and indeed airplanes themselves--may be quieter than they currently are. Treatment plants may find ways to reduce their odors. If such advances occur, no benefits would be created by requiring large buffers designed at a time when people simply assumed that landfills, airports, and treatment plants would always inevitably be bad neighbors. A recent encouraging example of technological innovation can be found in Placer County itself. As you know, the Formica processing plant has installed devices virtually eliminating emissions of strong odors.

If the County insists that such large buffers are necessary, and must be enshrined in this General Plan, we recommend that the County consider a policy of purchasing the land required to preserve a county asset, rather than requiring a handful of property owners to set aside land that will benefit the public at large. Sacramento County has adopted a policy of purchasing lands within the 2,000 foot buffer surrounding the Keifer Road landfill. Another example of purchasing lands around public facilities can be found at the Sacramento Metropolitan Airport. Sacramento County has purchased a substantial amount of land zoned agriculture surrounding the airport. Sacramento County finances the purchase of these agricultural lands by leasing back

to farmers interested in growing crops. We recommend that Placer County study the Sacramento County's public facility buffer and financing policies. Consideration should be given to adopting similar policies.

F-6-3

URBAN SEPARATOR BUFFERS (p. 22)

General Plan policies should be economically realistic and feasible. The proposed policy that would require new growth areas to provide self-contained one-mile Urban Separator Buffers is infeasible. Furthermore, I believe that Alternative #5, as adopted by the Board of Supervisors on June 15, 1993, clearly states that all buffers must be internal to the project and may include 1 to 20 acre rural residential parcels. A one-mile Urban Separator Buffer is a burden our project cannot finance.

F-6-4

Further problems will occur if County policy requires the project proponent to purchase adjacent lands to serve as buffers. The owners of such parcels may simply not be interested in selling, or may want to use their properties for something other than buffer areas. Moreover, by requiring land adjacent to new growth areas to be used as Urban Separator Buffers, the County will de facto rezone the properties between proposed projects and urban areas, giving the land owners added value without a formal change of zoning. Occupying a virtual monopoly position vis-à-vis the landowners in the new growth areas, the owners within the designated buffer areas may demand unrealistic sums for their land, jeopardizing the viability of feasible development of the new growth areas.

TRANSIT CORRIDORS (p. 31)

We support your discussion of a transit corridor along the Blue Oaks extension and Watt Avenue. We would strongly suggest, however, that staff also examine the use of the portion of Baseline Road extending to State Route 99 as a potential Express Bus Transit Corridor. Such corridors provide access to transit at widely-spaced transit stops or in conjunction with TOD's.¹ Designation of Baseline Road as a transit corridor may alleviate traffic impacts within the City of Roseville and Interstate 80, and allow for interim implementation of transit policies while mass transit funding is secured.

F-6-5

¹ "TOD" stands for "Transit-Oriented Development(s)."

The County may want to consider drafting a "transit zone" policy. Transit zone policies encourage transit ready land uses and have different parking and intensity standards to encourage greater density and access to transit.

F-6-5

PART II: GOALS, POLICIES, AND IMPLEMENTATION PROGRAMS

SECTION 1: LAND USE (pp. 33-47)

F-6-6

1.B.4. "The County shall ensure that residential land uses are separated and buffered from such facilities as landfills, airports, and sewage treatment plants."

As noted above, we believe that one mile public facility buffers are not necessary. Please see our earlier comments.

1.B.7. "The County shall require multi-family developments generally to include private open space for each dwelling."

F-6-7

In order to make this policy more workable, the General Plan should define and quantify what is meant by "private open space" (i.e., must it be "commons" or can it be open space within private parcels?).

1.G.6. "The County shall require new non-agricultural development . . ."

F-6-8

Our earlier comments regarding agricultural buffers are relevant to this policy.

OPEN SPACE, HABITAT, AND WILDLIFE RESERVES (pp. 38-39)

1.H.2 "The County shall require that development be planned and designed to avoid areas rich in wildlife or of a fragile ecological nature (e.g., areas of rare or endangered plan species, riparian areas)."

F-6-9

Current planning methods emphasizing the *avoidance* of habitat areas have resulted in isolated islands of open space. Most conservationists agree that such fragmentation is the cause of the current decline of plant and wildlife populations and diversity within preservation areas. Originally, conservationists believed that since wildlife populations managed to thrive on islands isolated by thousands of miles of ocean, islands of open space surrounded by urban growth

would also survive. Such persons did not realize that islands within oceans originally developed and formed as isolated entities, whereas the artificially fragmented areas created by modern development patterns began as enormous interconnected chains of habitat. In natural islands surrounded by water, only those animal and plant species adapted to survive and propagate within such limited land areas could perpetuate themselves on the islands. Species that could not adapt to isolated conditions simply did not survive, or even establish themselves.

With respect to the "islands" created by modern development, many species simply cannot survive the resulting isolation from larger habitat areas. As a result, the resulting fragmented open space areas have been unable to sustain viable populations of native pre-development fauna or flora. The areas are too small and isolated to support the number and diversity of species necessary to maintain a viable community. Such development patterns have created the following adverse biological consequences: 1) loss of those species that tend to conflict with humans; 2) domination by alien or human-adapted species that depredate on temperamental or native species; 3) inbreeding amongst species, resulting from the low-densities and isolated populations, and decreases in biodiversity; 4) isolation of interdependent species by human factors; and 5) an ultimate breakdown of food chains and life-cycles.

F-6-9

Recognizing the problems resulting from policies that always favor "avoidance" over the off-site purchase, dedication, or recreation of connected habitat areas, many leading conservationists now support the latter kinds of approaches as means of creating large interconnected open space and habitat areas through which species can move freely across large connected expanses. We may not need more public domain acres; but we most assuredly will need different acres and different configuration.² Corridors of open space help maintain biodiversity and eliminate the fragmentation that has caused the decline of many species.³

Moreover, the corridors connecting habitat areas need not always be without utility for people; and many corridors serving other purposes can double as corridors for wildlife movement. For example, mammals can use abandoned railroad rights-of-way and easements for powerlines, pipelines, and other uses. Birds can use as corridors wooded median strips of roadways, windbreaks, greenbelts, and wooded visual screens. Equestrian trails, jogging trails, and bicycle routes can be of value in urban areas, just as wooded fencerows play a role in rural landscapes. All of these kinds of areas represent linear connectors that crisscross the landscape; and all can play a role in an interconnected habitat system.

²/ The fact that leading environmental organizations favor the creation of wildlife "corridors" connecting habitat areas is evident from Exhibit A submitted herewith, a document published by Defenders of Wildlife entitled, "Preserving Communities and Corridors."

In light of these considerations, we suggest that the County consider modifying proposed Policy 1.H.2 as follows:

"The County shall require that development be planned and designed to avoid areas in wildlife or of a fragile ecological nature (e.g., areas of rare or endangered plant species, riparian areas). Alternatively, where avoidance is infeasible or where equal or greater ecological benefits can be obtained through off-site mitigation, the County shall allow project proponents to contribute to off-site mitigation efforts in lieu of on-site mitigation."

F-6-9

ECONOMIC DEVELOPMENT (pp. 43-45)

The County may wish to consider policies that streamline the permitting process for business, thus providing a substantial economic benefit to the community. Many large companies that provide primary wage earner jobs would like a "one-stop" permitting process in which a County staff member acts as a liaison between the various county departments and the large employer. The County should also consider using "Master EIRs" within the Specific Plan Areas. Effective January 1, 1993, the use of Master EIRs will be authorized by Public Resources Code sections 21156 through 21158.5.

F-6-10

SECTION 2: HOUSING (p. 49)

We understand that, because the County adopted its revised Housing Element in July 1992, the current General Plan Update is not formally addressing the Housing Element, which must be treated as final and presumptively legally adequate for the purposes of the Update.

Nevertheless, we offer the following comments on housing issues generally. We recognize that, in general, a range of housing types are needed to attain a jobs/housing balance, to attract future employers, and to ensure the success of a mixed use project. We suggest that, with these principles in mind, the County defer any detailed discussion regarding the range of housing that must ultimately be built within any "new growth area" such as the West Placer Specific Plan until such time as proposed Specific Plans have been prepared for such projects.

F-6-11

Within the City of Roseville, Specific Plans include a goal of achieving ten percent affordable housing, which should be dispersed throughout the planning area to avoid concentrating affordable units solely at any particular project site. Such concentration can lead to the blight of the area in question.

We also wish to state that existing community plans should be updated to be consistent with the Housing Element.

F-6-11

SECTION 3: TRANSPORTATION AND CIRCULATION (pp. 51-62)

STREETS AND HIGHWAYS (pp. 51-54)

We are aware of concerns expressed by Roseville with respect to the possible impacts on its road system from development in the new growth areas. In order to persuade the City of our good faith and willingness to work to mitigate any such impacts, we propose that the County add the following proposed policy under Goal 3.A.:

F-6-12

"In processing and approving Specific Plans for new growth areas in Southwest Placer County, the County shall explore in detail potentially feasible means of mitigating any significant impacts that may occur on the circulation network in the City of Roseville."

TRANSIT (pp. 54-57)

The Regional Transit Board has completed the route adoption EIR (State Clearinghouse # 90020031) that designates the Southern Pacific Right-of-Way between Antelope Station and Roseville Parkway as a Light Rail Transit ("LRT") Corridor. Furthermore, Sacramento County has proposed Light Rail extensions for the Rio Linda/Elverta TOD area, which would be placed within an unused rail corridor. Placer County should consider aligning its rail and surface transit corridors with those designated in Sacramento County. Transit Corridors should also be aligned with potential LRT terminus stations, potential express bus routes, or transportation hubs such as the Sacramento Metropolitan Airport. We propose you consider adopting the following policy:

F-6-13

"The County shall designate transportation corridors that provide linkages with other regional transportation corridors, Light Rail Terminus Stations, and major transportation facilities."

SECTION 4: PUBLIC FACILITIES AND SERVICES (pp. 63-77)

WATER SUPPLY AND DELIVERY (pp. 66-67)

We have two primary comments on this portion of the proposed Policy Document. First, we believe that a stronger case can be made for the use of reclaimed water. As you may recall, when we proposed the original Placer Villages Plan, we showed that the use of reclaimed water would reduce the need for potable water by 25 percent, a significant reduction in potable water demand. In general, the use of reclaimed water has the following benefits:

- a. Reduction of water demand requires less money to be spent on smaller water transmission lines, since the diameter of such lines can be smaller than they otherwise would be.
- b. Furthermore, if the proposed regional wastewater treatment plant ("WTP") is strategically located on Pleasant Grove Creek, reclaimed water from the facility could also be used for agricultural irrigation. Locating the WTP between the new growth areas and agricultural areas could provide the County with a source of water benefiting agriculture. Such a policy could contribute to the County's interest in finding additional sources of water for the agricultural community in Placer County.

F-6-14

Our second point related to Water Supply and Delivery has to do with the assessment of the costs of building water supply and water treatment infrastructure. We recognize the need to construct and provide adequate facilities such as water treatment plants. We propose, however, that the costs associated with constructing such facilities be assessed based on the extent and the timing of the benefits derived by various parties.

F-6-15

The County should consider financing schemes that recognize current-day levels of entitlement. A sliding scale of assessment should recognize those properties that have entitlements but cannot or do not expect to proceed with development in the near term. A potential third category would be properties with no urban entitlement but whose owners are interested in assuring that any facilities constructed in the near-term will be constructed so as not to preclude the extension of service or so as to make the extension of service prohibitively expensive.

LANDFILLS, TRANSFER STATIONS, AND SOLID WASTE RECYCLING
(pp. 72-74)

Implementation
Measure 4.19

"The County shall develop and adopt an ordinance prohibiting new residential lot splits within one mile of any landfill currently accepting wastes and within 500 foot of any inactive landfill that accepted wastes after 1980."

F-6-16

Comment: Please see our earlier comments on the subject of "Public Facility Buffers," in which we state our view that this policy is unnecessary.

SCHOOLS (pp. 76-77)

Our concern about policy 4.J.11. is the risk that schools may have to be constructed *before* residences are occupied or constructed.

Within the North Central Roseville Specific Plan, Vencil Brown Elementary School was constructed prior to the construction of nearby residential development. In fact, not one home was in place when the school was completed. As a result, the Roseville Elementary School District has a new Elementary School without an adequate pool of students to use it; and the District must absorb maintenance costs without the ability to collect taxes from residents the school was intended to serve. In an effort to offset these costs, the District is currently leasing Vencil Brown Elementary School to Sierra College. Placer County, together with the school districts, should make every effort to avoid this kind of situation in the future. Please consider revising policy 4.J.11. as written below:

F-6-17

". . . The County, to the extent possible, shall ~~require~~ strongly encourage that school facilities ~~are should be constructed and operating prior to the occupation of concurrently with the construction of~~ the residences which the schools are intended to serve."

HIGHER EDUCATION (p. 77)

The future needs of Sierra Community College cannot be met solely at the present site in Rocklin. New community college facilities should be placed near existing urban development

F-6-18

and near or within one of the new specific plan areas. Please consider revising policy 4.J.16. in the following manner:

~~"The County shall work with the Sierra Community College District to support the development/location of a new community college in the area generally west of the Roseville City Limits and south of Pleasant Grove Creek to ensure that higher education programs and facilities are available to Placer County."~~

F-6-18

SECTION 5: RECREATIONAL AND CULTURAL RESOURCES (pp. 79-85)

Based on our review of the Recreational and Cultural Resources section of the Draft General Plan Policy Document, we have the following comments.

In addition to Table 5-1 ("Park Classification System"), the County should consider adding a policy identifying the kinds of open space that will qualify as "parks" for purposes of the policies under the heading "Public Recreation and Parks." Such a policy should include an open space classification system with provisions to grant park credit. With these general notions in mind, please consider the following specifics.

F-6-19

In addition to the traditional "active" parkland classification system (as shown in Table 5-1), the County should also consider policies for non-traditional "open space or passive" parklands. Furthermore, to provide landowners with an incentive to provide parks and open space in excess of minimum requirements of the County's Active Parkland Standard, Quimby Act park credit should be given to landowners who choose to provide such additional acreage. Landowners should also have the right to assign any excess park credits to other landowners who are ostensibly required to dedicate parkland but cannot feasibly do so.

Agricultural and Sensitive Habitat Buffer Zones having potential for passive recreation should also qualify for open space park credit. The following lands should be considered to receive open space park credit:

F-6-20

1. Floodways
2. Wetlands
3. Riparian Areas
4. Public Greenways (pathway areas that allow public access from one place to another)

5. Public Golf Courses (after all, these areas provide recreational uses)
6. Private Golf Courses Open to the Public
7. Private Open Space
8. Sensitive Habitat Buffer Areas
9. Agricultural Buffer Zones
10. Private Recreational Facilities.³

F-6-20

SECTION 6: NATURAL RESOURCES (pp. 87-102)

6.A.1. My earlier comments in Part I regarding Sensitive Habitat Buffers also apply here.

F-6-21

6.A.4.(f) "Provide for long-term creek corridor maintenance by providing a memorandum of understanding, performance bond, or other financial commitment to the County."

F-6-22

It is our opinion that financial mechanisms for long-term creek corridor maintenance are not necessary. After all, these creek corridors have survived for centuries without being maintained by anybody. The only maintenance required may be periodic trash pick-up. We suggest that the responsibility for the periodic trash pick-up in creek corridors be assigned to the local Recreation and Parks District or Landscape and Lighting District. Because properties within the district would be assessed for these costs, the private sector and homeowners would indirectly bear the burden of such maintenance. Under such an approach, existing County residents would not have to pay for the maintenance of Creek Corridors within the new Specific Plan areas. *Performance Bonds are not feasible because bond underwriters will not issue a bond in perpetuity without a term or expiration date.*

WOODLAND AND RIPARIAN AREAS (pp. 91-92)

6.B.5. "The County shall require development that may affect a woodland to employ avoidance, minimization, and/or compensatory mitigation techniques"

F-6-23

³/ Credit for private open space areas should only be granted after all opportunities to provide public lands or facilities have been exhausted.

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Please see my earlier comments regarding the benefits of preserving and creating open space connected by corridors, as opposed to avoiding habitat in a way creates isolated fragments of wild lands surrounded by urbanization. We would like to have the County revise the language of policy 6.B.5. in order to make it more consistent with Implementation Program 6.7. In addition, we would like the County to consider a policy expressly identifying the virtues of mitigation banking. Mitigation banks are better for wildlife and sensitive resources in the long-run than a series of "postage stamp" size isolated wetlands or strands of vegetation. Therefore, please consider adopting the following proposed policy:

F-6-23

"The County may choose to allow landowners or developers to impact on-site habitat areas if the landowners or developers are willing to dedicate off-site land for habitat preservation or money for purchase for such off-site land or participation in a federal, state, county, or private land trust approved mitigation bank."

FISH AND WILDLIFE HABITAT (pp. 92-96)

6.C.1 "The County shall identify and protect critical nesting and foraging areas, important spawning grounds, migratory routes, waterfowl resting areas, oak woodlands, wildlife travel corridors, and other unique wildlife habitat areas critical to protecting and sustaining wildlife populations."

We have two concerns about this policy. First, we think that the term "critical" should be defined, so as to provide property owners and the public with a better idea of what the county has in mind here. Secondly, we are concerned that the policy reads in rather *absolute* terms. Taken literally, it could be construed as utterly forbidding any development affecting "critical areas," even where adequate off-site mitigation may be available and feasible. We therefore propose that you consider the following modifications to the proposed policy:

F-6-24

"The County shall identify and, where feasible, protect critical nesting and foraging areas, important spawning grounds, migratory routes, waterfowl resting areas, oak woodlands, wildlife travel corridors, and other unique wildlife habitat areas critical to protecting and sustaining wildlife populations. Where such habitat areas cannot be feasibly protected on-site or where equal or greater ecological benefits can be obtained through off-site mitigation, the County shall allow project proponents to contribute to off-site mitigation efforts in lieu of on-site mitigation."

These proposed changes would make us much more comfortable with the policy. Still, even our proposed wording does not define the word "critical," as used in the policy. We look to the County and its consultants to offer a precise definition.

F-6-24

* * *

6.C.9 "The County shall require new private or public developments to preserve and enhance existing native riparian habitat unless public safety concerns require removal of habitat for flood control or other public purposes. In cases where new private or public development results in modification or destruction of riparian habitat for purposes of flood control, the developers shall be responsible for acquiring, restoring, and enhancing at least an equivalent amount of like habitat within or near the project area."

We have two major concerns with respect to this proposed policy. First, we are not sure what is meant by "other public purposes." Does the category include private development, which satisfies market demand for various land uses and generates tax revenues -- both of which benefit the "public"? Secondly, the policy does not seem to allow for off-site mitigation as an alternative to avoidance of on-site resources where on-site avoidance is either infeasible or less ecologically desirable than off-site mitigation. We therefore propose the following changes:

F-6-25

"The County shall require new private or public developments, where feasible, to preserve and enhance existing native riparian habitat unless public safety concerns require removal of habitat for flood control or other public purposes. In cases where new private or public development results in modification or destruction of riparian habitat for purposes of flood control, or where it is infeasible to preserve and enhance on-site habitat areas, the developers shall be responsible for acquiring, restoring, and enhancing at least an equivalent amount of like habitat within or near the project area."

* * *

6.C.10 "The County will use California Wildlife Habitat Relationships (WHR) system as a standard descriptive tool and guide for environmental assessment in the absence of a more detailed site specific system."

F-6-26

If the County wishes to incorporate the WHR system by reference into the General Plan as a binding standard for environmental assessment, then whatever documentation explains or embodies the WHR system should be provided as an appendix to the Policy Document.

F-6-26

* * *

- 6.C.11. "Prior to approval of discretionary development permits involving parcels within a significant ecological resource area, the County shall require, as part of the environmental review process, a biotic resources evaluation of the sites by a wildlife biologist, the evaluation shall be based upon field reconnaissance performed at the appropriate time of year to determine the presence or absence of rare, threatened, or endangered species of plants or animals. Such evaluation will consider the potential for significant impact on these resources, and will identify feasible measures to mitigate such impacts or indicate why mitigation is not feasible."

This policy contains what appears to be a typographical error. We assume that the words, "the evaluation . . ." (at the end of line 4 above) are intended to start a new sentence. More importantly, however, we are concerned that the policy could be read to allow a field biologist to make binding determinations as to what kinds of mitigation measures are "feasible" for a landowner to implement. Under CEQA, that determination should be left to the ultimate decisionmakers through the adoption of findings. (See Pub. Resources Code, § 21081.) We therefore would revise the policy as follows:

F-6-27

"Prior to approval of discretionary development permits involving parcels within a significant ecological resource area, the County shall require, as part of the environmental review process, a biotic resources evaluation of the sites by a wildlife biologist. The evaluation shall be based upon field reconnaissance performed at the appropriate time of year to determine the presence or absence of rare, threatened, or endangered species of plants or animals. Such evaluation will consider the potential for significant impact on these resources, and will identify potentially feasible measures to mitigate such impacts or indicate why mitigation is not feasible. In approving any such discretionary development permit, the ultimate decisionmaking body shall determine whether the proposed mitigation is in fact feasible."

OPEN SPACE FOR THE PRESERVATION OF NATURAL RESOURCES (p. 97)

6.E.1. "The County shall support the preservation and enhancement of natural land forms, natural vegetation, and natural resources as open space to the maximum extent feasible. The County shall permanently protect, as open space, areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains."

We believe that, read in conjunction with other General Plan policies allowing development in "new growth areas," this policy cannot reasonably be read as an absolute. Nor do we believe that the County intended it as such. Nevertheless, in the interest of achieving clarity on this point, we recommend the following modifications:

"The County shall support the preservation and enhancement of natural land forms, natural vegetation, and natural resources as open space to the maximum extent feasible-, consistent with other General Plan policies allowing development in identified new growth areas. To the extent feasible, the County shall permanently protect, as open space, areas of natural resource value, including wetlands preserves, riparian corridors, woodlands, and floodplains."

F-6-28

SECTION 7: AGRICULTURAL AND FORESTRY RESOURCES (pp. 103-109)

The issue of agricultural productivity on lands in the "new growth areas" identified on the Land Use Diagram has been the subject of much spirited discussion. *Our comments on this subject are limited to land owned within the West Placer Specific Plan Area.* Our comments therefore do not pertain to other agricultural areas in the County. Agricultural productivity must be evaluated objectively and on a property-by-property basis. Some lands in Placer County might be well-suited for agriculture, while others may not.

The 5,940 acre West Placer Specific Plan Area currently has approximately 1,300 acres (22%) in agricultural production. All are on *Class IV* Soils, which the U.S. Department of Agriculture ("USDA") and the Soil Conservation Service ("SCS") classify as "poorly suited for agriculture." One of the few crops that may be grown on Class IV Soils is rice. Rice yields within the West Placer Specific Plan Area are approximately 64 sacks per acre, while yields in other areas of Placer and Sacramento County are in excess of 80 sacks per acre. Our crop yields are verified by the Placer County Agricultural Commissioner's office and the Placer County Agricultural Stabilization and Conservation Service.

F-6-29

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Proof of the actual character of our soils is submitted with this letter as Exhibit B. The document is entitled, "Placer Villages: A New Vision for South Placer County." It was prepared by Calthorpe Associates in August 1991. Figure 24 on the document, located on page 26, is a map entitled, "Soil Classifications." Prepared by MacKay and Soms for Calthorpe Associates, the map clearly shows that the vast majority of the subject property consists of Class IV soils. ⁴ The map is based on a soil survey of western Placer County conducted by USDA and SCS. (A narrative discussion in support of the map can be found on pages 25 and 27 of the text of the document.)

Additional proof of the character of the soils on the Placer Villages project area can be found in an additional document submitted with these comments as Exhibit C. It is entitled, "Placer Villages: Agricultural Element," and was prepared by agAccess in August 1991. Virtually the entire document deals with soil qualities and agricultural activities occurring on the project site. In particular, however, you should note that on page 2 the text explains that, although there are some areas with Class II and Class III soils, "[t]he majority of the soils are Class IV, classified as being 'poorly suited to agriculture.'" (See also Appendices B and C to Exhibit D, which analyze the soil types at the subject site in terms of the categories and precise locations used in USDA soil maps and geologic survey maps prepared by the United States Geological Survey.)

F-6-29

Mr. Yeager, you made a statement at the Planning Commission Hearing on October 28, 1993, regarding rice production on Class IV Soils. You said, "Rice actually does better on poorer soils." For the record, we respectfully disagree with your statement, and inquire whether your statement was based on empirical evidence from studies conducted by authorities on rice production. If so, we would like you to please inform us of the source of your information. If rice crops perform better on Class IV Soils than on better soils, how do you explain the difference in crops yields of over 100 sacks per acre on Class I Soil on property that the principal owners of the West Placer Specific Plan area also own in the North Natomas Area of Sacramento County or on similar Class I soils in Sutter and Colusa Counties? If, as we suspect, there is no empirical evidence supporting your statement on October 28th, we would respectfully urge you to retract your statement for the record, and to use caution in the future in making such statements for the public record. The danger with such statements is that, because members of

⁴ Class I soils are "excellent or well-suited to general intensive agriculture." Class II soils are "good [and] well-suited to agriculture." Class III soils are "only fairly well suited to agriculture." Class V soils are "very poorly suite to agriculture." Class VI soils are "not suited to agriculture." For an extended discussion of these categories, see Exhibit C submitted herewith, Placer Villages: Agricultural Element, Appendix A, "Soil Classification System," pp. A 1 - A 2.

the public and the media unknowingly view you as an authority on rice production, your comments are treated as fact even when they are not accompanied by any scientific analysis.

F-6-29

SECTION 9: NOISE (pp. 121-125)

9.A.10.(b) "The noise source in question consists of a single roadway or railroad for which up to date noise exposure information is available"

Because many airports provide up to date acoustical information, please consider revising the above-quoted language to read as follows:

F-6-30

"The noise source in questions consists of a single roadway, or railroad, or airport runway approach for which there is up to date noise exposure information available. In the case of an airport runway, the information must show that the noise in question is within acceptable standards. An acoustical analysis will be required when the noise source in question is a stationary source or airport, or when the noise source consists of multiple transportation noise sources;"

PART 3: SPECIFIC DEVELOPMENT STANDARDS FOR NEW GROWTH AREAS

Naturally, our comments focus only on the standards applicable to the Placer Villages Specific Plan.

OPEN SPACE (p. 132)

With respect to Development Standard # 3, please consider adding greenways within powerline easements to your list of allocatable open space uses. Furthermore, we presume that acreage dedicated toward golf courses open to the public may be included as an allowable open space use under "recreation areas." Please let us know if we are mistaken in this assumption.

F-6-31

With respect to that same Standard, please note that, as we submitted it, the Land Use Diagram in the proposed West Placer Community Plan tentatively shows 1,310 acres of Open Space. We believe that the exact Open Space acreage, as well as the appropriate land uses for the Open Space areas, should be determined and calculated at the time we submit and process a Specific Plan for the Placer Villages project.

F-6-32

With respect to Standard # 3, I would also like to reiterate my earlier comments regarding the use of park credit for open space.

F-6-33

REQUIRED BUFFERS (p. 132)

With regard to proposed Development Standard # 4, I would like to reiterate my earlier comments relating to agricultural buffers and the infeasibility of the proposed urban separator buffers.

F-6-34

NOISE (p. 135)

"Development within the Specific Plan Area shall be designed to attenuate aircraft noise associated with operations at McClellan Air Force Base."

With respect to this policy (Development Standard # 9), we feel that the noise contours for the McClellan AFB runway approach are within acceptable limits. The Placer County General Plan EIR shows that the majority of these contours are 60 db or less. Conditions with 60 db or less are acceptable for outdoor activity areas in both residential and non-residential developments. The standard for indoor areas is less than 45 db. We therefore propose that the County consider amending policy #4 as follows:

F-6-35

"Development Areas within the Specific Plan Area shall be designed to attenuate aircraft noise associated with operations at McClellan AFB if noise contours are in excess of 60 db."

COMMENTS ON THE DRAFT EIR FOR THE GENERAL PLAN

In our comments on the Draft EIR, we will also address the subjects in the same order in which they occur in the document.

INTRODUCTION (pp. 1-6)

The Introduction makes clear that the Draft EIR consists not only of the separate document styled, "Draft EIR," but also of the Draft General Plan Background Report and Draft Policy

F-6-36

Document, as well as the Issues and Options Report. (See p. 1.)⁴ Particularly when these four documents are taken together, they supply more than adequate detail to support the adoption of the General Plan by the Board of Supervisors.

Recent case law indicates that EIRs for General Plans need not deal with site-specific information in great detail, but instead should focus on larger issues of regional importance, saving site-specific analysis for later environmental documents. "CEQA recognizes that environmental studies in connection with amendments to a general plan will be, on balance, general." (Al Larson Boat Shop, Inc. v. Board of Harbor Commissioners (1993) 18 Cal.App.4th 729, 746 [--- Cal.Rptr.2d ---], quoting Schaeffer Land Trust v. San Jose City Council (1989) 215 Cal.App.3d 612, 625 [263 Cal.Rptr. 813].) Thus, an EIR for a General Plan "need not be as precise as an EIR on the specific projects which might follow." (Larson, supra, 18 Cal.App.4th at 746 [--- Cal.Rptr.2d ---], quoting Rio Vista Farm Bureau Center v. County of Solano (1992) 5 Cal.App.4th 351, 374 [7 Cal.Rptr.2d 307].) "Deferral of more detailed analysis to a project EIR is legitimate. It has been held that 'where practical considerations prohibit devising [detailed mitigation] measures early in the planning process (e.g., at the general plan amendment or rezone stage), the agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval.'" (Larson, supra, 18 Cal.App.4th at 747 [--- Cal.Rptr.2d ---], quoting Sacramento Old City Association v. City Council of Sacramento (1991) 229 Cal.App.3d 1011, 1029 [280 Cal.Rptr. 478].)

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The Draft EIR for the proposed Placer County General Plan more than satisfies the standards articulated in these cases, especially in light of the fact that the text expressly states that additional, more detailed EIRs will be for "projects implementing the *General Plan* (e.g., community plans, specific plans, individual projects)." (See page 5 (italics in original).) The Draft EIR, in other words, is a "first tier" document that, in effect, will form a data base on which later EIRs for later projects will build. This point deserves emphasis.

The Legislature has decreed that agencies' EIRs "shall be tiered whenever feasible, as determined by the lead agency." (Pub. Resources Code, § 21093, subd. (b).) By streamlining environmental review at the Plan-adoption stage, the use of tiering "will promote construction of needed housing and other development projects[.]" (Id., subd. (a).) An EIR for a General

⁴ The use of such multiple documents is permissible, of course, because CEQA grants lead agencies broad discretion to integrate an EIR for a General Plan directly into the Plan itself. (CEQA Guidelines, § 15166; see also CEQA Guidelines, § 15080 ("[t]o the extent possible, the EIR process should be combined with the existing planning, review, and project approval process used by each public agency").)

Plan is the paradigmatic example of a "first tier" document, which should focus on "general matters," with later EIRs focusing on site-specific issues. (CEQA Guidelines, § 15385; see also Pub. Resources Code, §§ 21068.5, 21094; Larson, supra, 18 Cal.App.4th at 741 [--- Cal.Rptr.2d ---].)

The proponents of the West Placer Specific Plan are well aware that the County will have to prepare a very extensive EIR at the time the County considers adoption of a Specific Plan for the project. The same is undoubtedly true of the other proposed "new growth areas" (Bickford Ranch, Stanford Ranch West, and Villages of Dry Creek). Thus, should the County receive comments either from other agencies or from the public to the effect that the General Plan EIR does not adequately address the impacts of those four projects, the County should respond (i) that following the Legislature's command to use tiering "whenever feasible," it has prepared the EIR as a "first tier" document, and (ii) that there will be separate EIRs for each proposed Specific Plan for the new growth areas, on which members of the public and other agencies will be able to comment during the CEQA process for those projects.

F-6-36

* * *

On page 6, the Draft EIR discusses the manner in which many of the General Plan policies were formulated. More specifically, the text explains that many policies were formulated as responses to the environmental problems that would be created through buildout of the Land Use Diagram in the absence of mitigation.

Because we are aware that some persons have questioned the desirability and even the legality of what they call a "self-mitigating General Plan," we want to state for the record our view that the County's approach is both sound and legally permissible, and our understanding that the above-referenced policies are intended to function, and will function, as *de facto mitigation measures* that will be legally enforceable and binding as *law* within Placer County. Placer Villages Association certainly anticipates that such policies will be binding in the upcoming processes for the formulation of Specific Plans for the individual new growth areas. To the extent that future events persuade the Board of Supervisors that any General Plan policies are unworkable or unwise, formal amendments to the General Plan will be required.

F-6-37

CHAPTER 1: PROJECT DESCRIPTION AND IMPACT SUMMARY

PROJECT OBJECTIVES (pp. 1-5 - 1-6)

We do not disagree with, or question the legal adequacy of, the "project objectives," which are based on direction from the Board of Supervisors after its review of the *Issues and Options*

F-6-38

Report. Nevertheless, we would like to state in greater detail what we understand to be some of the policy bases for the Board's tentative commitment to direct growth into "new towns." Objective # 4 -- "[b]alance growth by separating and individualizing population centers" -- speaks to this issue.

As we understand the Board's intentions and objectives, a primary basis for directing growth away from existing cities such as Roseville is to create new urban areas that will create a distinctive sense of place for their residents. In other words, if all growth must flow into cities, which will constantly expand as they annex new territory, development will take on the form of seemingly unending sprawl, in which whole cities seem to blend into one another, with no distinguishing features separating distinct areas. To understand what we mean, one need only think of portions of the Los Angeles Basin, in which a traveler can pass through numerous cities that seem to blur together into one gigantic megalopolis. The creation of separate, identifiable towns, in contrast, will avoid this phenomenon.

The creation of new towns also provides planners the chance to design communities virtually "from scratch," taking advantage of modern planning concepts that would be difficult to superimpose onto existing urbanized areas. For example, many planners argue that mixed use communities will reduce automobile travel, increase transit usage, and increase pedestrian travel, thereby reducing both air pollution and traffic congestion. Moreover, building on a "town" scale -- large but not huge areas -- allows developers to take advantage of economies of scale in building infrastructure without sacrificing their ability to create a distinctive sense of place.

F-6-38

The shift of growth pressure into Southwest Placer County will also have air quality and circulation benefits, as we'll discuss below. Specifically, when planned future transportation improvements are built, residents of Placer Villages will be able to bypass Interstate 80 entirely as a means of traveling into Downtown Sacramento, and will instead be able to travel southward via State Route 99/Interstate 5 and by future light rail extensions.

In sum, we believe that the "project objectives," as set forth on pages 1-5 and 1-6 can be reasonably understood to favor the creation of new growth areas for specific planning reasons, such as (i) the benefits of creating discrete "towns" that will feel separated from other areas within the metropolitan area and give residents a sense of place, (ii) advantages in designing areas to achieve a desirable balance between various kinds of land uses, (iii) the ability to use economies of scale in constructing infrastructure, and (iv) the benefits of shifting commute traffic away from Interstate 80 and towards SR 99/I-5 and future LRT extensions.

IMPACT SUMMARY (pp. 1-9 - 1-11)

Loss of Farmland (p. 1-10)

On the question of the quality of the soils on the Placer Villages property, please see our earlier comments provided in connection with the proposed Policy Document. We hereby incorporate those comments, along with the cited supporting evidence, into our comments on the Draft EIR.

F-6-39

CHAPTER 2: ASSUMPTIONS AND DEVELOPMENT ESTIMATES

HOLDING CAPACITY OF THE DRAFT GENERAL PLAN (pp. 2-3 - 2-5)

The Draft EIR itself notes that the "Holding Capacity of the General Plan," as depicted in Table 2-3 (page 2-4), overstates the actual number of housing units and the amount of commercial and industrial square footage that will actually be built under the land use designations assumed within the Table. As the Draft EIR explains on page 2-5,

"[t]he actual level of development at buildout, however, will not reach the theoretical holding capacity. Based on historic experience in Placer County, and elsewhere, most land will not develop at its maximum allowed intensity because of market forces, parcel-specific constraints, and other factors. For a variety of reasons, some property owners will simply not develop their land or sell it for development."

F-6-40

We assume that, in identifying the County's "holding capacity" in unrealistically large numbers, the County has taken a "worst case" approach in order to satisfy CEQA, which has been understood by the courts to generally require agencies to err on the side of overstating, rather than understating, the severity of environmental impacts. Nevertheless, we wish to emphasize the correctness of the assumption that the holding capacity set forth in Table 2-3 creates the misimpression that the proposed General Plan would identify more land for urbanization than can be supported by market forces and population projections in the foreseeable future.

It is indisputably true that land development almost never occurs at the density and intensity that is theoretically allowed under General Plan designations and zoning. One obvious reason for this is the reality of the marketplace. Markets react to people's needs and desires, not to the allowable densities shown on a General Plan or zoning map. Quite frequently, consumers prefer to live and work in areas with lower densities than a landowner, in theory, could have developed.

A second reason is that, even where land use designations and zoning theoretically allow dense uses on a site, the process of designing specific projects brings to the fore environmental and topographical constraints that limit intensity and density of use. At the time when planners and designers begin to decide where on a piece of property particular buildings and facilities should go, they come to grips with the need to avoid areas that are either environmentally sensitive or too steep, hilly, wet, or unstable to build on.

A third reason is that the lack of services and infrastructure in relatively remote areas both constrains development in such areas and renders them less attractive to consumers. In many instances, areas that are slated for development in planning documents cannot be built-out until development occurs first on land lying between those areas and the edge of existing urbanized areas.

F-6-40

The exorbitant cost of constructing infrastructure in some areas is a fourth reason why development often does not occur at theoretically allowed maximum densities and intensities. For example, the cost of providing expensive levees for adequate flood protection in floodplains (e.g., North Natomas) can add so much cost to a proposed development as to render it infeasible. When the price of each home lot or each square foot of office space includes substantial money for flood control costs, the resulting prices for housing and office space may be more than the market can bear.

In Placer County in particular, much of the holding capacity is outside the greater Sacramento Metropolitan area, of which Southwest Placer is a part. In particular, much of the holding capacity is in the Central and Eastern (mountain) portions of the County. This fact is evident from materials included as part of Exhibit B submitted herewith, "Placer Villages: A New Vision for South Placer County." We call your attention specifically to page 39, which includes two relevant sections: Table 2, "Placer County Growth Projections"; and Graph 3, "Placer County 1990-2020 Supply/Growth Scenarios (Additional Population Increment)." The Table and Graph are both based on a document entitled, "Projections of Population, Employment and Housing Demand by Price Range in the Sacramento Region and Placer County," prepared by Economic and Planning Systems. We have submitted a full copy of the latter document as Exhibit D to these comments.

F-6-41

Before referring you back to Table 2 and Graph 3, I want to draw a very important piece of information from Exhibit D itself, namely, the fact that, based on market and demographic projections, Placer County's share of population growth within the greater Sacramento Metropolitan area should be somewhere between 112,000 and 170,000 during the period from 1990 to 2010. (See p. ii.)

Keep those figures in mind in examining Table 2 and Graph 3. Graph 3 shows that a disproportionate amount of the County's holding capacity is in the "Central and East County" area, which is east of Auburn and mainly in the Sierra Nevada--outside the greater Sacramento Metropolitan area. Table 2 shows that the total holding capacity in *all* of Placer County during that period will be 300,000 persons. A much more important calculation, however, is the holding capacity of those portions of Placer County within the greater Sacramento Metropolitan area. Assuming that, of the areas shown on Table 2, only "Rocklin," "Roseville," and "West County" are within that metropolitan area, then only 122,200 of the overall Countywide holding capacity of 300,000 is within the greater Sacramento Metropolitan area. You will note that *122,200 is near the low-end of the projected population increase of between 112,000 and 170,000 that will go into those portions of Placer County that function as part of the greater Sacramento Metropolitan area.*

F-6-41

Based on a number of considerations, we are convinced that Southwest Placer is a logical and natural growth area in the next 20 years. As you know, the greater Sacramento Metropolitan area has not developed in "concentric circles," as many other major urban areas have done. Rather, development has occurred along major transportation corridors, and has stayed away from areas without adequate infrastructure or with unavoidable constraints. Many of the areas in which development has occurred until recently, however, are now built-out. The market will therefore look for new areas that either are served, or can be served, by infrastructure and that are not subject to unavoidable constraints.

F-6-42

The area south of Highway 50 and north of I-80 has already been built-out, as has the area south of the City of Sacramento between SR 99 and I-5. Development in North Natomas and southern Sutter County is constrained by flooding problems. Development in southeast Sacramento County is constrained by a lack of a transportation corridor and noise from aircraft using Mather Air Force Base. In light of these considerations, the marketplace will likely seek out Southwest Placer as a major new focus of new development.

Even assuming, however, that the County has a more than adequate holding capacity for those areas within the greater Sacramento Metropolitan area, such an excess is a *good thing*, in that it keeps housing and other kinds of development more affordable to consumers than it otherwise would be. Without a substantial "*supply margin*" (i.e., excess holding capacity compared with growth projections), consumers would have to pay more for their homes and commercial space. Under basic principles of supply and demand, an excess of land available for a particular use translates into competition amongst developers and reduced prices to consumers. In contrast, a supply that either exactly matches or fails to meet growth projections gives developers the ability to insist on prices far exceeding their costs of production.

F-6-43

CHAPTER 3: LAND USE, POPULATION, AND HOUSING

HOUSING (pp. 3-6 - 3-12)

On the subject of housing, we want to reiterate, as we stated in our comments on the Draft Policy Document, our understanding that, because the County's Housing Element was been officially approved for more than a year, its adequacy is not now in dispute and cannot be challenged as part of the General Plan Update.

F-6-44

On a related subject, we also want to state that the portion of the Draft EIR dealing with housing is also beyond challenge, since it relates back to the approved Housing Element. Moreover, the subject of housing is "outside the CEQA purview" except insofar as the eventual construction of housing will involve direct impacts on the physical environment.

In San Franciscans for Reasonable Growth v. City and County of San Francisco (1989) 209 Cal.App.3d 1502, 1522, fn. 13 [258 Cal.Rptr. 267], the Court of Appeal categorically rejected the notion that a project's creation of new demand for housing constituted an environmental impact for purposes of CEQA: "demands for additional downtown housing implicate *social and economic*, not environmental, concerns and, thus, are outside the CEQA purview." (Emphasis added.)⁶ In general, CEQA documents need not analyze economic and social effects, unless such nonenvironmental effects in turn inexorably lead to foreseeable environmental effects. (CEQA Guidelines, §§ 15064, subd. (f), 15131, subd. (a).)⁷

F-6-45

In short, the County has "volunteered" to address the subject of housing in the Draft EIR, and cannot be legally challenged with respect to anyone's view that the analysis falls short in some perceived respect.

⁶ See also Pasadena v. State of California (1993) 14 Cal.App.4th 810, 827-834 [--- Cal.Rptr.2d ---] (Court rejects claim that creation of new parole office will involve any "environmental effects," despite obvious creation of social effects).

⁷ In addition, an agency *may*, but need not, take economic and social effects into account in assessing the significance of related physical effects. (CEQA Guidelines, §§ 15064, subd. (f), 15131, subd. (b).)

CHAPTER 4: TRANSPORTATION AND CIRCULATION

In our comments on Section 3 of Part II of the proposed General Plan Policy Document, we proposed an additional General Plan policy to address concerns raised by Roseville with respect to its fears that development in the new growth areas would adversely affect the City's road system. We hereby incorporate those comments into these comments on the Draft EIR.

F-6-46

STREETS AND HIGHWAYS (pp. 4-17 - 4-51)

Impacts (pp. 4-38 - 4-39)

On the subject of traffic-related impacts, we hereby submit, as our Exhibit E to this letter, a document entitled, "Impact on the I-80 Corridor of Alternative Land Uses in South Placer," prepared by Fehr & Peers Associates in July 1991. It demonstrates that, compared with buildout in existing cities as a response to future growth, development of the Placer Villages Project will provide certain advantages in terms of reducing the rate of increase of traffic congestion on both Interstate 80 ("I-80") and State Route 65 ("SR 65"). Although the entire document merits close review, we call your attention particularly to the Executive Summary, which states that, compared with scenarios involving future growth within existing cities in Placer County, "the increase in traffic volumes would be up to 31% lower on Route 65 and up to 44% lower on Interstate 80 if a new pedestrian/transit oriented town (Placer Villages) in South Placer County were built."

As is evident from Figure 3 ("Regional Context Map") within Exhibit B submitted with this letter, residents of Placer Villages should ultimately have at least two routes into Downtown Sacramento other than the I-80 Corridor. One such route would be a light rail line that would connect Downtown Sacramento with Placer Villages, via the Rio Linda/Elverta TOD Area. The second alternative route would be via SR 99/I-5, which currently is far less congested than I-80. In other words, by shifting new growth westward, away from the I-80 Corridor, Placer County will allow its future residents to avoid that congested corridor in travelling into Sacramento. Because SR 99/I-5 still contains much unused capacity, such a shift will represent a much more efficient use of regional transportation facilities. Such a practice shall result in greater environmental benefits at a lower cost to the taxpayers. The environmental benefits are the reduction in traffic congestion and shorter commute distances, resulting in better air quality. The primary economic benefit is the elimination of the need to invest millions of taxpayers' dollars widening Interstate 80.

F-6-47

Other traffic benefits associated with the design and location of Placer Villages are the facts that, internally, it will contain a relative "jobs/housing balance" and will be located close to the North

Industrial Area in the western portion of Roseville. In other words, because many jobs will be located either within or very near to the West Placer Specific Plan, fewer residents simply will have no need to use the regional freeway system in order to travel to and from work.

F-6-47

CHAPTER 5: INFRASTRUCTURE

COMMUNITY AND INDIVIDUAL WASTEWATER SYSTEMS (pp. 5-16 - 5-42)

Placer Villages Specific Plan Area (pp. 5-39 -5-40)

Exhibit F submitted with this letter is a document entitled, "Placer Villages: Agricultural Water Report." It was prepared in 1991 by agAccess. It actually relates not just to the subject of wastewater treatment, but also to the subject of water supply. Therefore, please treat the following comments, as well as the document, as relevant to both subjects.

The Agricultural Water Report describes the extent to which reclaimed wastewater, after use by urban residents, can be reused by agriculture in Southwest Placer County, thus reducing the use of groundwater in the area. The Report also notes that urban uses in the Placer Villages area will actually consume less water than is currently used by irrigated agriculture (i.e., rice farming).

F-6-48

This subject is also addressed under the heading, "Reclaimed Water System" (pp. 23-29), within Exhibit G submitted herewith, entitled, "Water, Wastewater, Reclaimed Water, Drainage and Agriculture Systems," prepared in March 1992 by PACE Civil Engineering.

DRAINAGE (pp. 5-42 - 5-52)

We are aware that the City of Roseville has expressed concern that drainage from new growth areas might increase the flow of water in creeks flowing into the City. In light of this expressed concern, we want to state for the record that drainage from Placer Villages will flow in a *westward* direction, away from Roseville (which lies *east* of the project area).

F-6-49

The drainage characteristics of Placer Villages are explained at length within Exhibit G (referenced above) under the heading "Drainage System" (pp. 30-45). In particular, Figure 8 on page 40 shows the general westward and southwestward flow of water from the project site.

CHAPTER 8: NATURAL RESOURCES

VEGETATION AND WILDLIFE RESOURCES (pp. 8-21 - 8-34)

Habitat Conversion in New Growth Areas (p. 8-25)

We hereby incorporate by reference into these comments on the Draft EIR those portions of our comments on the proposed Policy Document in which we advocated policies recognizing the biological benefits of using off-site mitigation in order to create habitat areas connected by corridors, as opposed to relying solely or primarily on the on-site "avoidance" of habitat as the preferred technique of mitigation.

F-6-50

AIR QUALITY (pp. 8-35 - 8-39)

Our comments above relating to traffic impacts also apply to the subject of air quality; we therefore incorporate them by reference into this portion of our comments. We would like to add, however, that the *internal design* of Placer Villages, in addition to its external relation to the regional transportation system, will reduce the number of automobile trips that would occur without the special design, thus also reducing air pollution. The design of Placer Villages will incorporate the so-called "TOD" concept, which lays out various land uses within a project area in ways intended to maximize both pedestrian travel and transit ridership. The concept is described in Exhibit H submitted with this letter, a document entitled, "Transit-Oriented Development Impacts on Travel Behavior." Compiled by Calthorpe Associates in 1992, it consists of a series of documents dealing with the ways in which TODs affect travel behavior.

Exhibit I is a document entitled, "Air Quality Study for Placer Villages Project." It was prepared in 1991 by Fehr & Peers Associates, Inc. The Study compares emissions that would occur with buildout within existing cities in Placer County with emissions that would occur if growth were directed instead into the Placer Villages project area. Although the Study assumed a greater population within the project (83,000) than is currently assumed, its overall conclusion remains valid.

F-6-51

As the cover letter for the Study explains in summary, "the results shows that total daily vehicle emissions would be 4.7% lower for Reactive Organic Gases, 13.1% lower for Nitrogen Oxides, and 14% lower for Particulate Matter and Sulfur Dioxide compared with the same population and employment located throughout South Placer." Figure 1, included within the Study itself, clearly illustrates the air quality benefits associated with directing growth into a TOD-based project such as Placer Villages, compared with allowing buildout to occur within existing cities.

CHAPTER 9: HEALTH AND SAFETY

NOISE (pp. 9-10 - 9-20)

Potential Exposure of Noise-Sensitive Land Uses
to Unacceptable Aircraft Noise (pp. 9-17 - 9-18)

On the subject of noise impacts from aircraft operations associated with McClellan Air Force Base, we wish to note that, at a meeting of the Foothill Airport Land Use Commission on November 3, 1992, a speaker testified that the current noise contours associated with the operations of McClellan were premised on the assumption that a fleet of KC-135 tanker aircraft, which refuel other aircraft in mid-air, would be based at McClellan. We understand that this assumption has proven to be incorrect, thus calling into question the validity of the noise contours associated with activities at McClellan, since the K-135's would have been very loud. Please look into this matter and revise the Final EIR accordingly.

F-6-52

CONCLUSION

Thank you for considering our comments on both the Draft General Plan Policy Document and the Draft General Plan. Palisades Development, which represents a property owner in the West Placer Specific Plan, will also be submitting its own comments.

Sincerely,

Nick Alexander

Nick Alexander
Secretary/Treasurer
Placer Villages Association
West Placer Specific Plan

G. General Public

G-1 Greg and Linda Martin (10/26/93)

G-1-1. General Plan should address schools

Refer to common response #7.

G-1-2. General Plan should ensure that police and fire services will be financed

The Policy Document includes policies ensuring the provision of such services.

G-1-3. County should plan for open space and parks

The Policy Document includes policies ensuring the provision of parks and open space.

RECEIVED

NOV 0 1 1993

GREG & LINDA MARTIN
P.O. Box 462, Loomis, CA 95650 (916) 653-4343

October 26, 1993

- Board of Supervisors (5)
- John Marin
- County Executive
- County Council
- Planning
- Public Works
- Environmental Health
- Clerk of the Board
- File

- DATE 10-27-93
- Board of Supervisors
 - John Marin
 - Don Lunsford
 - Clerk of the Board
 - [Signature]

General Plan
J. Update
 OCT 27 1993

BOARD OF SUPERVISORS

Placer County Planning Commission
11424 B Avenue
Auburn, CA 95603

RE: General Plan Update

Dear Planning Commissioners:

I was not able to attend the recent public hearings on the General Plan Update, but what I have been reading has concerned me. I would like this letter to go on record expressing my concerns.

Schools - The county must plan for locating, funding and building schools in the county. The state has reduced funding for new schools to the point where its contributions are becoming insufficient. Voters are becoming reluctant to approve any more bonds to build schools because they are feeling the crush of the economic downturn in California and because they already feel taxed to death. They are particularly reluctant to agree to pay the bill for a new school when the school becomes necessary because of new housing developments (or whole new cities) approved by the county within their school district. That unchecked growth also reduces the number of viable locations for schools.

If the county allows unchecked growth to continue without adequately addressing the need to educate the children which will come with that growth, the future of this whole area will be jeopardized. If the quality of the schools falls, many people will leave the area and others won't want to locate here because of the lack of good schools. If there are not good schools in the area, businesses will not want to locate in the county because they will have difficulty finding good employees and their existing employees won't want to relocate to the area. It's a vicious circle that can be short-circuited by planning for good schools now.

The general plan should include guidelines for the locating, funding and building of new schools required to meet the need of new homes and new cities within the county. You can no longer push that responsibility off on the state or on the taxpayers. Require developers to bear the major expense of providing schools to service the homes they want to build, and require that housing developments and new cities include locations for new schools to serve the children that will live in the new houses. That will go a long way toward assuring there will be sufficient good schools in the county in the future.

Police & Fire Protection - Like schools, new housing developments and new cities in the county also increase the demand for police and fire protection. The county must plan ahead to finance these services or the quality of life in the county will degrade to the point where it will be very difficult to attract businesses to the area. The state has signalled its reluctance (inability) to continue financing such services and the taxpayers are also putting their feet down. Taxpayers would rather see no growth than have to foot the bill for more service to new

G-1-1

G-1-2

houses and new cities that will just mean more traffic, more crime, more crowding, less service to existing residents and less of the open spaces and scenic beauty they originally settled in this county for. If developers are not required to provide funding for emergency services for the new houses/cities they want to build, taxpayers will continue to oppose these projects or will depart the county in droves in search of "greener pastures."

G-1-2

Open Space - I also hope the county will plan ahead to determine which areas in the county should be kept rural/agricultural to contribute to air quality and the quality of life in this county. You should also plan the locations of parks and nature areas and should incorporate flood plains and other disaster preparedness measures into these areas. Overcrowding leads to increased problems with traffic, crime, violence (particularly domestic violence), flooding, fires and other symptoms of urban sprawl. If you don't plan "breathing spaces" for the residents of this county and places for children and families to play, you will have to deal with the side effects of modern, crowded, rushed, over-stressed life. That will mean more police and fire protection services, more family counseling, more juvenile detainment facilities, more medical clinics, etc. No, I'm not exaggerating; just read the headlines of the *San Francisco Chronicle*, *Los Angeles Times* or *Sacramento Bee*.

G-1-3

My family and I like living in Placer County. We want to stay living and working here. But current plans for growth in the area have us concerned. We do not oppose all growth, but we do disagree with poorly planned growth. We have recently considered relocating outside Placer County, and we have been concerned that my husband's employer or some of my clients will decide to relocate out of the county (or even out of the state!). Problems with water, pollution, crime, unemployment and education have placed a greater burden on these companies as the county and state have increased the red tape and requirements on existing businesses. Poorly planned growth will surely mean more problems with water, pollution, etc., etc., and these companies have reached their saturation point with how much "regulation" they can bear. We have heard the grumblings, and we won't be surprised if these (and other) companies leave the area, but we will be disappointed. Like I said, we like living here (so far). If the county doesn't make the right decisions now, however, we may have no choice but to leave in search of employment, better schools, cleaner air, open spaces and a safe place to live. Please try to make good decisions now.

Thanks for listening,

Linda Martin

LM:me

cc: Placer County Board of Supervisors

G-2 Jim Ricker (10/28/93)

G-2-1. *Draft Plan* documents are inadequate

Comment noted; no response required.

G-2-2. Not opposed to concept of new towns, but historically they have not worked, so cities should accommodate growth

Comment noted; the revised Policy Document reflects a shift away from reliance on "new towns."

G-2-3. *Draft Plan* and *Draft EIR* do not address financing of public facilities sufficiently

The policies and programs of the Policy Document provide assurance that existing residents will not be required to subsidize new development.

G-2-4. *Draft Plan* agricultural policies are too weak

The County disagrees.

G-2-5. *Draft Plan* should ensure that infrastructure is built concurrently with residential construction

The Policy Document includes policy language that ensures the timely provision of infrastructure.

G-2-6. *Draft Plan* and *Draft EIR* do not adequately address water issues

Refer to common response #9.

Copy of comments made
before Placer County Planning
Commission - 10/28/93.

PLACER COUNTY
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General Plan Update PLANNING DEPARTMENT

Hi my name is Jim Ricker - Jim from Flat
Thank you for this opportunity. These documents, in
a way, are inadequate. They do not
conserve ^{our} natural resources and they do not
preserve the rural flavor of the County. Do
we really want to look like Santa Clara
County? Like the song asks "Do you know the
way to San Jose?" The answer is yes and
this plan will take us right there. What
this plan doesn't do is protect current residents
from ^{the} tax increases that will result from all
of this growth.

G-2-1

I am not opposed to the New Town Concept
per say. If they are planned properly, are environmentally
sound and pay for themselves, then these new
towns just may be the answer to the County's
population growth. However it is ironic that
several of the proposed developments may have to
rely on Roseville's infrastructure yet Roseville
will be ^{adversely} negatively impacted by these same
developments. Why not just let Roseville
accomodate some of the new growth? Besides
I don't like the idea of abandoning our cities.
A Community, the backbone of Community, the

G-2-2

reality of Community can be achieved within a well planned city. New Towns are not a magic pill and I have grave concerns about those being proposed.

Historically new towns have looked good on paper but have been a flop in practice. Residences get built before the infrastructure is in place, the commercial development doesn't arrive due to economic conditions or zoning changes brought on by local pressure. The jobs never come and all too often taxes are raised to bail the projects out. Residential development is notorious for not paying its own way. The figure I've heard is they cover about 20% of cost and even if developer fees cover capital expenses, the cost of operation and maintenance, a substantial sum, is borne by all of us.

This plan is not adequate in addressing these concerns. Granted there are some good sounding policy statements but there are also a lot of loose ends and ambiguities.

For instance under implementation - Pg 65 # 4.5
"The County shall develop and adopt ordinances specifying acceptable methods for new development

③

to pay for new Capital facilities and expanded services. Does "expanded services" include maintenance and operational costs as well?

And what is encompassed by the phrase "Cost of upgrading existing public facilities" as found under 4B2 on pg 64. Does it mean just the capital costs or all costs?

On some page - 4B4 it states "The county shall seek broad based funding sources for public facilities and services that benefit current and future residents of county". This sounds very open

to interpretation and also sounds like it may be a funding source at the discretion of the county. And what does 4B5 mean? will developer fees be lowered if "Project economic" dictates it?

I'm willing to pay my fair share but it isn't fair to ask me to subsidize these projects. I live in a rural area and I accept a lower level of services. I guess I must ^{also} accept that

the county is going to grow but I will not tolerate my taxes increasing so these new developments can enjoy a higher level of services.

Yes, I am skeptical about this policy document. For example in the EIR³⁹⁸ under cumulative impacts

(4)

Roads: Traffic limitation zone fees do not fund improvements due to cumulative impacts of County wide growth. Additional funding from local sources needed to fully mitigate the impact of County wide growth on regional arteries. Possible sources include a $\frac{1}{2}$ cent sales tax and County wide development fees. It sounds like are taxes are going up to me.

G-2-3

There are other deficiencies in this plan. The agriculture element is too weak and Policy 162 essentially contradicts itself. Regarding development the County needs to adopt the concept of concurrence. Policy 4A2 on Pg. 6.3 is far too ripe for abuse. Infrastructure should always be built concurrently, if not prior to the construction of houses.

G-2-4

G-2-5

Another inadequacy concerns water. The new towns are to be treated individually, at a later date, through specific development plans and these documents seem to gloss over their cumulative effects. I don't see how the County can essentially approve these new towns without a clear and concise analysis of our realistic water supply. Water rights ~~are~~ not water supplies.

G-2-6

⑤

No mention is made concerning the impact of drought, no mention of environmental requirements that may force PCWA and NID to forego some water rights. (For Delta restoration, Salmon Runs - State and Federal regulations). Even if "substantial improvements" were carried out to supply water, it raises the question again: Who Pays? Will the agency raise everyone's rates? Sell Bonds? and will the water really be affordable?

G-2-6

These concerns must be addressed.

You have the opportunity and the responsibility to take the long term view. Please look beyond the short term economics and political expedencies and do what is right for Placer County. We need a revised plan, one that truly conserves natural resources, one that preserves our rural flavor, and one that minimizes the fiscal impacts on current residents.

Thank you

Jim Ricker - Jim Ricker

33377 Main St Dutch Flat

P.O. Box 536 Alta 95701

916 389 8344

G-3 Janice Palmer (11/10/93)

G-3-1. *Draft EIR is grossly inadequate*

Comment noted; no response necessary.

G-3-2. *Draft Plan proposes a tremendous premature leap*

Comment noted; no response necessary.

G-3-3. *Draft Plan new growth areas are inappropriate and illogical*

Comment noted; the revised Policy Document reflects a shift away from reliance on new growth areas as a means of accommodating demand for development.

G-3-4. *Draft Plan new growth areas are unnecessary because current zoning can accommodate 40-60 years of growth*

Refer to response to comment G-3-3.

G-3-5. *Since new growth areas are not necessary, the General Plan should direct growth to cities*

Refer to response to comment G-3-3.

G-3-6. *Draft EIR fails to properly analyze conversion of agricultural lands*

The County feels the Final EIR's discussion of agricultural land conversion is appropriate.

G-3-7. *How will County mitigate rise in agricultural land prices?*

The Policy Document includes policies and programs to minimize the impacts of agricultural conversion on ag-designated areas. This includes strong statements discouraging the conversion of these ag-designated areas to urban uses.

G-3-8. *Have Draft Plan's new growth areas caused increased speculation?*

This comment refers to speculation that might have occurred as a result of the designations on the Draft Land Use Diagram. The County is not able to quantify the effects of any such speculation that may have occurred.

G-3-9. *Can Draft EIR be adequate when previous Agricultural Element is not included in Draft Plan?*

Virtually all of the substantive policies and programs from the previous Agricultural Element have been incorporated into the Policy Document. The only substantive change relates to the redesignation of some areas on the Land Use Diagram.

G-3-10. Does *Draft EIR* adequately evaluate and provide mitigation for sustainability and feasibility of agriculture?

The Policy Document includes policies and programs to minimize adverse impacts on agricultural operations, promote Placer County's agricultural economy, and discourage the conversion of ag-designated areas to urban uses.

G-3-11. Does *Draft EIR* mitigate or identify justification for premature conversion of farm lands?

The EIR addresses farmland conversion and cites Policy Document policies and programs to discourage premature conversion.

G-3-12. Does *Draft EIR* mitigate for loss of quality of life?

While the EIR does not address an impact category called "quality of life," the aggregation of all the impact analyses provides a comprehensive view of the potential effects of development under the General Plan.

G-3-13. Does *Draft EIR* identify where farmers can go to replace land converted in Placer County?

The General Plan does not contain policies or programs compelling existing farmers and ranchers to cease their operations and, therefore, the EIR does not suggest alternative locations for such operations.

G-3-14. Does *Draft EIR* identify any resources that are "infinite"?

This comment concerns the use of groundwater. The Policy Document includes several policies and programs intended to protect this valuable resource.

G-3-15. How long will current landfill last with additional growth areas?

The EIR estimates that the Western Regional Sanitary Landfill has capacity through at least the year 2050.

G-3-16. *Draft EIR* is premature because it cites flood control studies not yet completed.

Comment noted; no response required.

G-3-17. How can loss of agricultural lands and open space be justified given their beneficial effect on air quality.

Comment noted; no response required.

G-3-18. Does *Draft EIR* mitigate for ripple effect of agricultural land loss?

The EIR does not contain such an economic analysis, nor is it required to according to CEQA.

G-3-19. How does *Draft EIR* mitigate for loss of spin-off benefits of agricultural land?

The County feels the Policy Document and EIR adequately address the commentors concerns.

G-3-20. *Draft Plan* buffer standards do not adequately address rural/urban conflicts

The County disagrees.

G-3-21. How will *Draft EIR* stabilize or mitigate the rise in agricultural land values?

The Policy Document includes extensive policy supporting the continued viability of Placer County's agricultural economic base and the EIR recognizes the mitigating effect of these policies.

G-3-22. How will traffic on Highway 99 be mitigated?

The EIR does not propose mitigation measures to address impacts on roadways outside of the County's jurisdiction. The Policy Document, nonetheless, includes policies committing the County to cooperation with neighboring jurisdictions with respect to traffic improvements.

G-3-23. Development near landfill will cause conflicts and associated problems

With removal of the Stanford Ranch West Specific Plan Area from the Land Use Diagram, the concerns expressed in this comment are no longer pertinent. Refer also to common response #6.

G-3-24. Attached letter from California Rice Industry Association

Comment noted; no response necessary.

November 10, 1993

TO: Placer County Board of Supervisors and Planning Commissioners

FROM: Janice Palmer - 8330 EVZ LANE, Roseville, Ca. 95747

Subject: Response to DEIR for General Plan Update

The following comments are submitted for consideration during the hearings on the Placer County General Plan Update and the accompanying Environmental Impact Report and Draft Policy Document.

General Comments:

The present draft of the Environmental Impact Report for the General Plan Update is grossly inadequate. The severe negative impacts to neighboring towns, cities, and community plans have been either grossly underestimated or entirely overlooked. Having read comments from some of the affected jurisdictions, I am hopeful that they will continue to point out needed improvements in the draft EIR. As the City of Roseville has pointed out numerous problems in their initial response regarding land use/incompatibilities, inconsistencies in the plan itself, negative impacts from additional and cumulative strains on services for traffic, flood control, wastewater treatment, water supply, and have tried repeatedly to assure those who apparently do not yet know...that there are "adequate areas already existing for growth" that will take us WAY beyond the 20 year-life-of the General Plan. WHY JUMP AHEAD 40-60 YEARS.

G-3-1

Specific Comments: It is vital that all of the residents of the area understand the tremendous "premature leap" the current direction of the General Plan is proposing. It defies all adopted planning constraints and adopted legislation to provide for logical growth. Since this "project" (the direction of growth for the next 20 years/the General Plan Update) may include rezoning, land development plans, and possibly several amendments, the preparation of the ENVIRONMENTAL REVIEW must be extensive, all inclusive, extremely analytical, and certainly address the concerns of all effected parties.

G-3-2

1. The current EIR and direction of the General Plan to accommodate new growth areas defies statewide efforts to prevent leapfrog development and the premature or unnecessary conversion of agricultural lands. Quoting the RULES OF ORDER FOR LOCAL AGENCY FORMATION COMMISSION (LAFCO)... "is a state-mandated regulatory body formed to review proposals involving jurisdictional changes for cities and most special districts. While annexations of inhabited areas were difficult to initiate and difficult to complete, annexations of uninhabited areas were simply initiated and virtually guaranteed successful. Annexation 'wars' were common as cities and special districts scrambled to annex areas in order to capture revenues or to preclude other agencies from annexing areas."

G-3-3

2.

Some of the worst examples of this are known as "cherry stems". These were formed when a city sought to single out and annex a particular noncontiguous area. The annexation boundaries included a long portion of road (*the 'stem') to bring the desired site (the 'cherry') into contiguity with the city's boundaries. As these types of annexations occurred, the boundaries become increasingly irregular, creating an abundance of parallel infrastructure lines and isolated service areas. This resulted in expensive and inefficient service provision. This type of decentralized growth led to local government and service delivery problems. Call them "new population centers", "new towns", or "cherry stems",... they are inappropriate and illogical growth centers that "benefit small special interest groups and a multitude of special district formations ..."

2. Because special interests can be very persuasive and persistent, clear back Based on the above, legislative mandates and policies were developed after World War II in the form of the Knox-Nisbet Act of 1963, The District Reorganization Act of 1965, and the Municipal Organization Act of 1977. Yet without unified efforts by contiguous cities and counties, problems continued. The conflicting laws were finally cleared up and the three above mandates were consolidated into the California Association of LAFCOs (CALAFCC) under the new statute Cortese/Knox Local Government Act of 1985 and it went into effect January 1, 1986. The Act provides legal and binding legislative power to: discourage urban sprawl, logical (key word) growth and orderly formation of development boundaries/spheres of influence, and services, and the associated local agencies based upon logical (key word) conditions and circumstances, the PROTECTION OF AGRICULTURAL LANDS, facilitate PLANNING. Additionally, LAFCO is to consider population & density, land area (use, topography, geographic features), need for services effect on adjacent areas and agencies, effect of proposals on agricultural lands, consistency with cities' spheres of influence and local agencies.

3. The final conclusion drawn in the LAFCO policies is (and I quote).. "Unincorporated islands, therefore, are not consistent with logical and efficient government.

*Baseline Road

G-3-3

3.

CONVERSION OF AGRICULTURAL LANDS:

When considering this Draft EIR or the direction (or misdirection) of the General Plan Update and its consequent goals and policies, it is paramount that we consider: 1. Is there an alternative? 2.. Is there a need? Additionally, for the EIR to be a document that is legally defensible it must be complete.

A. There have been numerous discussions and documentation of the fact that there is currently enough land zoned to accommodate all projected growth in the area for the next 40-60 years without ANY NEW POPULATION CHERRIES. Therefore, THERE IS NO NEED to direct County Staff to envision new growth areas. Unless the goal is to skip over the next 40 years and throw away all of our land use planning flexibility and the accompanying opportunity to respond as the NEED arises in the most appropriate and efficient manner.... relying on new technologies and studies.

G-3-4

B. Since there is no need for new growth centers, then the alternative must exist. It does. The alternative is to maintain our quality of life in Placer and objectively protect those elements that provide such a special "quality of life". If the DEIR identifies ag as a vital component of our quality of life then the Board needs to make the Agricultural Element and Right To Farm Ordinance meaningful parts of the General Plan Document and adopt Alternative One as the best compliment to that end.

G-3-5

1. HOW WILL THE COUNTY MITIGATE FOR THE CONVERSION OF AG LANDS?

The problem with allowing the current "planning" thrust to continue is that a system outside of anyone's control is set in motion. A system unregulated and unplanned. It is called land conversion. It is happening statewide at an alarming rate. It is this problem specifically that the DEIR fails to properly analyze.

G-3-6

2. HOW WILL THE COUNTY MITIGATE THE RISE IN AG LAND PRICES?

Urbanization and accompanying speculation, increases land prices above the land's value for ag production. The rising land prices increase production costs for farmers who rent or lease land and it makes it more difficult for people to enter farming or expand existing operations. High land prices increase "incentives" for farmers and ranchers to sell their operations to developers thus inducing urban growth and making farming less viable for the remaining farmers and ranchers. It is almost like a panic sets in and the land rush is on.

G-3-7

3. HAS THE "announcement" by the majority members of the Board of Supervisors that "new population centers" ("cherry stems") BEEN THE CAUSE OF INCREASED SPECULATION? IS THE UPDATE OF THE GENERAL PLAN IN REALITY AN "AFTER THOUGHT"?

G-3-8

4.

The focus of the General Plan Update for new population centers has obviously caused conditions in the County to resemble a "land rush" can this be mitigated, minimized, or reversed? Numerous pressures were immediately placed on farmers and ranchers by speculative buyers wanting to cash in on the chance to be "cherry stem" producers themselves. This announcement came before any EIR was done..that seems to be a dangerous way to "plan" growth.

G-3-8

4. CAN THE DEIR SCOPE BE CONSIDERED ADEQUATE WHEN THE AGRICULTURE ELEMENT ADOPTED BY THE PREVIOUS BOARD IS NOT EVEN RECOMMENDED AS ONE OF THE SEVEN ELEMENTS?

The County should attempt to rectify the situation by demanding that the DEIR include outside assessment of the impacts on our County's farmland, the Adopted Agricultural Element, and the Right to Farm Ordinance. Otherwise, the pro-development stand of the Board, well documented by the press, gives little hope that ag will get a fair shake and leaves the EIR open to question in its focus and OBJECTIVITY. Has the current Ag picture been adequately addressed? (See letter to Georgia Flake, Clerk of the Board of Supervisors dated March 30, 1993 from John R. Roberts, Executive Director of the California Rice Industry Association. Rice prices are soaring as are the uses of rice and product market in Russia and for the Pacific Rim.)

G-3-9

5. DOES THE DEIR ADEQUATELY EVALUATE AND PROVIDE MITIGATION FOR:

The stainability and feasibility of agriculture in Placer County dictates that the DEIR evaluate:

- a. land use conflicts such as health and safety hazards and nuisances resulting from increased population densities near farming operations,
- b. the growth inducement and cumulative impacts of projects involving farmland conversion,
- c. the indirect and direct impacts of loss of farmland on the surrounding areas,
- d. the the loss of an important economic base which has only a small demand for public services,
- e. how and where will water be provided at an affordable price?.

G-3-10

6. DOES THE DEIR MITIGATE AND EVEN IDENTIFY ANY JUSTIFICATION FOR PREMATURE CONVERSION OF FARM LANDS?

Accommodating leap frog development is NOT a justification. Once lost, farmland can not be recovered. THERE IS NO MITIGATION FOR ITS LOSS. Buffers and greenbelt's disappear with "amendments, variances, annexations, specific or community plan changes". These cumulative assaults will destroy ag in Placer County.

G-3-11

7. QUALITY OF LIFE... HAS THE DEIR DEFINED THIS TERM? HAS THE DEIR PLANS TO MITIGATE FOR THE LOSS OF SAME?

G-3-12

5.

The County of Placer, must make a decision...are ag lands just for ag until "needed" for houses or is Agriculture an integral part of our present quality of life and a viable component of Placer's economic base? Is it to be so in perpetuity? Make no mistake about it, this General Plan will decide that issue forever. Drive from here through Vacaville, Fairfield, to San Francisco. It gets more populated as you drive. It is definitely a matter of "quality of life" and "lifestyle".

G-3-12

8. WHERE DOES THE DEIR SAY THAT FARMERS CAN GO TO MITIGATE THE LOSS OF THE FARMING AND RANCHING AREAS OF PLACER?

G-3-13

Farmers and Ranchers who want to preserve their way of life have a right to do so somewhere in California...why not Placer? The people need to decide how or if Ag is to "fit in" as a component of our economy and our quality of life.

9. DOES THE DEIR IDENTIFY ANY RESOURCES THAT ARE "INFINITE" AND WHICH SHOULD BE VIEWED AND PLANNED IN A "WORST CASE SCENARIO"?

G-3-14

Ground water/surface water (urban areas use groundwater too in the form of wells for "conjunctive use") what happens in a drought when the well's in the area are already dropping 4-5' feet a year NOW. Antelope area relies totally on groundwater and has no plans for a surface water source.

Where is all the garbage going? At total build out of the proposed new population centers and the current zoned areas for growth the amount is staggering? HOW LONG WILL THE CURRENT LAND FILL LAST WITH ADDITIONAL GROWTH AREAS? WHERE WILL THE 300 TONS OF COMPOST/DAY GO?

G-3-15

The area already suffers from flooding problems. None of the issues can be totally addressed until the current studies are completed so the DEIR is premature in this area. What are the flood control capabilities of the area regionally if everyone goes with the "cherry stem" growth pattern? How will the negative impacts to Pleasant Grove be mitigated?

G-3-16

The area is already a "non-attainment" area for clean air. How can the loss of ag lands and open space be justified as they clean and cool the air. Urban use means more hot and crowded roads and vehicle emissions.

G-3-17

10. DOES THE DEIR HAVE A MITIGATION FOR THE ECONOMIC LOSS "RIPPLE EFFECT" AND ITS CONSEQUENT SIGNIFICANT COSTS TO PLACER?

The loss of farmland also creates conversions in the processing facilities of the area REGIONALLY...GOING BEYOND THE BORDERS OF PLACER. They may decline as profitability is adversely affected by the loss of producers needing their services. The ripple impact would also be felt in the farm equipment and supply industry.

G-3-18

6.

Ag employment would be lost, personal income in the ag sector could be further reduced impacting other areas like banking, and local stores (grocery, clothing, autos, etc.) The costs of providing public service to lands converted from ag uses to urban are usually more adverse in unincorporated portions of counties than in cities. Rural values and traditions erode as farming decreases. The valuable programs keeping children off the streets like 4-H and FFA also decline. Fun field trips to pumpkin patch farms, APPLE HILL type trips, and other ag enterprises like tree farms would be missed. Cities like San Francisco, LA, and San Jose have more crime, congestion, pollution, and other social problems (they have more people crowded together).

G-3-18

11. HOW DOES THE DEIR MITIGATE FOR THE LOSS OF THE "SPIN OFF" BENEFITS OF AG LANDS?

Spin off Benefits of maintaining Agricultural lands:

- a. QUALITY OF LIFE (DEIR NEEDS TO DEFINE TERM)
- b. little drain on that area of land IN AG for services (roads, schools, fire/police/sheriff protection, flood control, landfill, wastewater treatment, etc.)
- c. low cost flood control areas
- d. as a resource for: groundwater recharge potential, habitat for animals and birds, quality of life, lowers ambient temperatures by 10 degrees, improves air quality, less traffic and less noise.
- d. the 300 tons/day of compost from the landfill could be spread on farmlands and make the soils even more productive. (What will the landfill do with it otherwise?)
- e. effluent water from the waste water treatment plants can be sent to area farmers and ranchers and thus be "recycled" into food and fiber for us. Rice is grown in Davis with effluent.
- f. Idle Farmland (often left open after purchase by developers) would not be around to provide places to do illegal activities, vandalism, unauthorized off-road vehicle use, drinking underage, etc.
- g. Water quality and quantity would be better. Water consumption per/acre is often higher when ag land is developed for urban use. This increase in demand for urban use naturally reduces that available for ag. Urban use also pays more for water per/unit and this drives up the costs to farmers. Urban areas typically discharge more fecal coliform, oil, grease, and heavy metals to surface water sources, especially in times of flooding. By identifying recharge areas the groundwater supply can be protected.

G-3-19

12. HOW DOES THE DEIR PLAN TO MITIGATE THE PROBLEMS ASSOCIATED WITH THE INTERFACE OF RURAL/URBAN AS THE CURRENT PROPOSALS FOR BUFFERS ARE NOT SUFFICIENT TO PROTECT THE FARMERS AND RANCHERS?

HOW WILL YOU reduce the opportunities for neighborhoods of higher density to cause problems: with dogs & livestock, theft and vandalism, trespass and personal injury, illegal dumping, etc.

G-3-20

7.

What is adequate and compatible zoning that allows crops to be produced according to the current best farming methods unrestricted by complaints of urban areas regarding spraying, plowing, harvesting, etc. How will the farm roads not be restricted by heavy traffic from urban housing making movement of equipment and livestock hazardous. How will the negative impacts of urban areas vegetation be mitigated since ornamental plants and shrubs in urban areas often transport crop pests? This problem is exacerbated by transport by motor vehicles and pedestrian trespassers. Crop values and profits could be impacted.

G-3-20

13. HOW WILL THE DEIR STABILIZE OR MITIGATE THE RISE IN LAND VALUES?

The DEIR does not identify rising land values as a negative impact on the future of farming and ranching. Stabilization of the land values is a must. It would keep costs down for the farmer if urbanization pressures are removed and the Agricultural Element and the Right to Farm Ordinance became meaningful policies and comments of the General Plan. Otherwise it will make ag operations impossible and the land conversion process will continue creating the obvious conflicts that arise when urban/rural interface abruptly or when buffers & greenbelts are eroded by the whims of politics. Farmers and ranchers will be burdened with complaints of insects, dust, smoke, noise, odor, crop dusting etc.. and the other aforementioned headaches. (Rice requires crop dusting)

G-3-21

Attached are copies from Chapter 4 SUMMARY OF FARMLAND CONVERSION IMPACTS for further study and consideration by those doing the DEIR.

14. How will the traffic on HWY 99 be mitigated? Currently when you use HWY 99 it is already a highly traveled road.

G-3-22

- 15. SUNSET INDUSTRIAL AREA AND REGIONAL LANDFILL
 - a. How will the county ensure that the landfill will not have to be relocated?
 - b. Who will pay for a new site the developers or the county?
 - c. Who would pay for an EIR?
 - e. Who will pay for any lawsuits for a resident claiming health problems due to the proximity of the landfill?
 - f. Businesses locate in Placer County for the "Quality of Life" and they locate in the Sunset area so they aren't adjacent to housing how would this be mitigated?

G-3-23

Many comments I would have made are in the response from the City of Roseville.

BOS(5)

111 University Avenue

Sacramento, California

95825-6708

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Fax 916/929-4732



- Board of Supervisors (5)
- John Marin
- County Executive
- County Counsel
- Planning *original Loren Clark*
- Public Works
- Environmental Health
- Clerk of the Board
- File

RECEIVED
MAR 30 1993

CLERK OF THE BOARD OF SUPERVISORS

To: *March 30, 93 agenda*

Date: *Pg. 7. ILO Report.*

March 30, 1993

Ms. Georgia Flake
Clerk of the Board of Supervisors, Placer County
175 Fulweiler Avenue, Room 1
Auburn, CA 95603

RE: Placer County General Plan, Issues and Options
Report Update

Dear County Supervisors:

Please accept this as written testimony regarding Placer County's update of its General Plan, Issues and Options Report Update. We wish to comment on the issue of the value of land planted to rice, which is apparently a consideration in the Issues and Option Update.

We have learned that numerous comments have been made relative to rice fields being "low quality" or "poor" lands and how such relates to Placer County's long-range planning and development. Unfortunately, these comments are often reported only in the context of the number and types of crops these lands can economically support, and are rarely followed by a description of precisely what the soil classifications mean or their implications upon the economy and the environment.

Planted rice fields grow the most valuable crop of all to wildlife.

Few realize that rice fields in the Sacramento Valley of California are proven to support in excess of 116 species of birds, 28 species of mammals and 27 species of reptiles and amphibians, all of which utilize rice fields during their annual life cycles. Not less than 21 "special status" species (e.g., "threatened," "endangered," etc.) rely on these rice fields for habitat. All this while the farmer produces the most basic food staple on earth -- rice is eaten each day by half the world's population.

Rice fields are essential in plans to restore the Pacific Flyway for migrating waterfowl.

Testifying before the State Water Resources Control Board recently, Dan Chapin, Vice President of the California Waterfowl Association, remarked,

G-3-24

Ms. Georgia Flake
Placer County Board of Supervisors
March 30, 1993
Page 2

Survival of overwintering waterfowl in the Central Valley is dependent upon the availability of adequate food supplies. Food production on the 300,000 acres of remaining wetlands is insufficient to meet this need. As a result, wintering waterfowl depend heavily on the availability of waste cereal grains, particularly rice. A 75% reduction in rice...if translated into a 75% reduction in waste rice, could create a major food crisis for wintering waterfowl.

The Director of Ducks Unlimited's Pacific Flyway Operations, Jack Wentz, recently noted,

California has lost almost all of its original wetlands area and many of our ducks, geese and other waterbirds are at nearly historic population lows. While rice fields are not natural wetlands, their cycle of flooding and drying do mimic many of the characteristics of wetlands. The most obvious of these benefits is wintering habitat where many species of water birds can find food and shelter.

G-3-24

In a related matter in neighboring Sutter County (the Environmental Impact Report for the South Sutter County General Plan Amendment), the U.S. Fish & Wildlife Service noted to Sutter County Supervisors:

The final document continues to underemphasize the value of the project area to migratory birds. The loss of over 13,000 acres of riceland within the project area, with the potential to support nearly one-half million waterfowl in late winter, represents a highly significant habitat loss.

Summer-flooded rice fields are friendly to non-game birds and other wildlife.

Both State and U.S. governmental agencies have noted the significance of summer-flooded rice fields for the preservation of the Giant Garter Snake, which is listed as a "threatened" species, as well as mosquito fish, frogs, toads and other wildlife. The State's Department

Ms. Georgia Flake
Placer County Board of Supervisors
March 30, 1993
Page 3

of Fish and Game has recently suggested to the Sacramento Area Flood Control Agency (SAFCA) that it plant rice on thousands of acres in its planning area in order to mitigate for damage done by urban development.

Commenting on the Giant Garter Snake, the U.S. Fish & Wildlife Service, in the same correspondence to Sutter County Supervisors noted above, remarked:

Ricelands, surrounded by sloughs and ditches used by the Giant Garter Snake, are an integral part of the habitat requirements of this rare snake.

Clearly then, rice lands are not "low class" or "worthless," but rather essential, at least in this context.

Photosynthesis in rice fields offsets ill-effects of urban sprawl.

Rice plants naturally pump oxygen into the atmosphere during photosynthesis. California rice fields as a whole produce enough oxygen each year to supply the needs of 14 million people, about the equivalent of the population of Los Angeles.

Furthermore, one acre of rice "scrubs" from the atmosphere about 23,000 pounds of carbon dioxide, the same amount produced by a typical automobile in a year. With the phase-down of rice straw burning mandated by the Rice Straw Burning Reduction Act of 1991, these benefits have tremendous value in mitigating some of the worst aspects of continued urban sprawl in this region -- motor vehicles and residential fireplace emissions.

Market demand for California rice is very strong.

Rice consumption in the U.S. has doubled in the last ten years, and United States Department of Agriculture economists say demand is extraordinarily high on the U.S. West Coast. It is California rice that largely supplies this market. Further, quality U.S. food processors are paying generous premiums for California rice over other U.S. and foreign rice because of its superior quality. These have provided upward price pressures for California grown rice.

Expected changes in U.S. government farm programs due to federal budget constraints and the likely opening of the highest value market in the world--Japan--also portend

G-3-24

Ms. Georgia Flake
Placer County Board of Supervisors
March 30, 1993
Page 4

ever-increasing high-value markets for California produced rice.

Urbanization versus rice fields: dispelling the myths.

Other charges we have heard about relative to Placer County's planning process include statements relative to water use and pesticides. It is easily provable that California rice fields, on average, use less water per acre than do new residential developments, provided those developments are in densities of five homes per acre or more. To suggest that water resources could be saved by converting rice fields to typical suburban development simply cannot be supported in fact.

As to pesticides, it is also easily provable that chemicals available to rice farmers have been so severely restricted, only a handful of the very safest remain. The chemical of most concern to State of California authorities, molinate, is less lethal than common, ordinary table salt. Additionally, nearly all crop protection chemicals applied to California rice fields are applied by trained, licensed individuals.

G-3-24

By contrast, homeowners have available to them insecticides and herbicides that have long been banned from use in California rice farms because of health and safety concerns. Also true is the fact that in using lawn and garden chemicals, homeowners tend to use far more of the chemicals, and use them more often.

Therefore, it simply is not true that urban development is friendlier to the environment than producing rice fields. We believe we can prove without any credible arguments to the contrary that rice fields are very friendly--and extremely valuable--to the environment in nearly all respects. We would be pleased to elaborate should the issue of the value of rice lands continue to be a consideration in the process of Placer County's efforts to conduct its Issues and Options Update.

Sincerely,

CALIFORNIA RICE INDUSTRY ASSOCIATION...



by: John R. Roberts
Executive Director

JRR/kmb

G-4 Patricia Gibbs (11/11/93)

G-4-1. *Draft EIR* project description does not include sufficient information

The County disagrees with this assertion; nonetheless, the project description in the Final EIR has been reorganized and supplemented.

G-4-2. *Draft Plan* does not identify why new growth areas are "suitable" for development

As a result of their deliberations on the Issues and Options Report, the Board of Supervisors determined that the new growth areas were "suitable" locations for new development; the two largest new growth areas, however, no longer appear on the Land Use Diagram.

G-4-3. *Draft Plan* goal 1.A is inconsistent with Draft Land Use Diagram, since there is enough land currently designated for growth through 2040

Refer to common response #11.

G-4-4. *Draft Plan's* ag/timberland buffer is too narrow

The County agrees that the buffer width for irrigated vegetables and rice fields specified in the Draft Policy Document was too narrow, so the standard has been increased to 400 feet. The County would also like to point out that the General Plan's buffer standards will be enforced at the project development level to the satisfaction of the Board of Supervisors.

G-4-5. Width of *Draft Plan's* sensitive habitat buffers should depend on habitat being preserved

The County feels that the referenced buffer standard is sufficient.

G-4-6. *Draft EIR* does not sufficiently address issue of water rights

Refer to common response #9.

G-4-7. *Draft EIR* faultily assumes that life expectancy of landfill will be extended due to 50% reduction in rate of solid waste disposal

The County feels the EIR adequately addresses this issue.

G-4-8. *Draft EIR* should have addressed potential siting of hazardous waste facility.

Such an EIR analysis would involve inappropriate speculation regarding the location of such a facility. The Policy Document does, however, include policies addressing the siting of hazardous waste facilities.

G-4-9. Circulation Plan Diagram illustrates that new growth areas are seeds of sprawl

Comment noted; no response necessary.

G-4-10. Draft Background Report does not show the whole length of the Western States Trail through Placer County

The Background Report has been revised to accurately portray the Western States Trail.

G-4-11. How many staff hours will be required to carry out *Draft Plan's* implementation programs?

The County has not prepared such an estimate.

G-4-12. *Draft EIR* does not address short-term versus long-term impacts and the basis of decision to approve new growth areas

Chapter 10 of the Final EIR has been expanded to more fully address these issues.

G-4-13. *Draft EIR* doesn't adequately discuss growth-inducing impacts

The County disagrees; see discussion in Chapter 10 of the Final EIR.

G-4-14. *Draft Plan's* new growth areas are premature and unnecessary because they simply disperse growth, rather than directing it.

Comment noted; no response necessary.

PLACER COUNTY
DATE
RECEIVED

NOV 15 1993

November 11, 1993

Placer County Planning Department
11414 B St.
Auburn, CA. 95603
attn: Loren Clark

PLANNING DEPARTMENT

Re:Placer County General Plan Draft EIR

Dear Mr. Clark,

The following is a list of my concerns and confusions regarding the Placer County draft EIR:

1) This document does not have a project description. In place of a project description it has a document description i.e. a list of documents that comprise the plan. Without some narrative that describes the vision of this Countys' future based on the overall framework for development contemplated by the proposed General Plan, one is hardpressed to assess the relevance of the project objectives. (I'll give you an example to clarify my point) It is as though someone's objective is to provide low cost housing and then you find out the "project" is a highrise office building on Capitol Mall. The objectives are in this document. Please include a project description which would provide sufficient information for the reader to understand how these objectives were derived. At the very least this would include a discussion of the proposed new growth areas in the agricultural lands in the western portion of the County.

G-4-1

2) Policy Document pg23 please clarify how the Land Use Diagram "...identifies four areas as being "suitable" for development..." it is my understanding that these areas are merely large tracts of land purchased at relatively low prices by speculators who have the political wherewithal to direct the General Plan process. None of them met all the evaluation criteria per the Issues and Options report. So does the Land Use Diagram simply "depict" the four growth areas or if not please explain in what way they were found to be suitable.

G-4-2

3) Land Use goal 1.A There is more than enough land designated for all uses to accommodate our present growth rate to 2040. Therefore adding new growth areas at this time in ag/industrial areas is not a "...wise, efficient, and environmentally sensitive use of Placer County lands...". The action contemplated by the project and the goal are mutually exclusive.

G-4-3

4)Agricultural/ Timberland Buffer The residential exclusion area is too narrow to allow the legal distance for crop spraying. Reducing the buffer to 100' by installing a

G-4-4

landscaped berm again is insufficient to allow spraying. Why not make it a zero setback if a 8' cyclone fence with four strand barbwire and concertina wire is installed? I feel this issue must be addressed by professionals, or experienced ag operators in order for this so called buffer to function as it is intended to. These buffers are an essential element in the preservation of what will be left of Placer County ag land. Please elaborate how they are intended to function and if conflict occurs what mechanism will be in place to resolve them.

G-4-4

5) Sensitive Buffer Habitats- the width of the habitat should be dependent on what you are attempting to preserve. Specifying a 100' average may not be sufficient width and may only create what is considered an "edge habitat" that does not ultimately support the intended protected species.

G-4-5

6) Infrastructure water- the statement throughout this section of the dEIR that "PCWA has ample water rights to adequately serve this area in both 2010 and 2040." Is about as meaningful as saying Placer County will preserve ag land. Anymore, water rights seem only to relate to what you actually have control of and not what you have "dibs" on for future use. Recently, the City of Sacramento has chosen to ignore what PCWA has claimed as its full extent of American River rights. California's recent preliminary Water Demands Assessment report reduced Placer County's estimated water needs. Please address this discrepancy in the dEIR.

G-4-6

7) Solid Waste- The "life expectancy" of Placer County's landfills has been artificially extended due to the faulty assumption that "Placer County will achieve a 50 percent reduction in rate of solid waste disposal by the year 2000." The actual track record for waste diversion is about .5% a year. That is 2% for the period 1988 to 1992. The actual impact here has been underestimated due to a crystal ball speculation that the County will be in 100% compliance with AB939 in the time frame specified. This will truly be a time to celebrate. I don't know of any other jurisdiction that has this much optimism. The 50% reduction pronouncement is not included in any quantifiable way in the policy document to assure that the reduction will occur. Please estimate the impact at the current rate of waste reduction.

G-4-7

8) Speaking of Assembly Bills, I don't find any reference to the Tanner Plan regarding the County Plan for siting hazardous waste facilities. What are the general siting criteria? Is it safe to say that if a facility were sited it would be South and west of Auburn? I realize the County Plan has not been approved yet but I think the dEIR should discuss potential areas of conflict with the siting criteria.

G-4-8

9) Traffic- The circulation plan diagram gives one an accurate picture of what is being created by these new growth areas. They are simply the seeds for future urban sprawl. The creation of these urban arterials will have significant growth inducing impacts. This circulation pattern will blur the line between urban, suburban and rural areas. Communities will not remain separate and distinct. The circulation pattern is in conflict with Land use policy 1.A.5.

G-4-9

9a) Background Volume II Figure 8-1 the Western States Trail is a major trail that starts in Sacramento and traverses the entire eastern side of Placer County from Granite Bay ultimately to Reno. This map does not show the whole length of this trail through Placer County. Please update the map.

G-4-10

10) Implementation programs- How many staff hours will be required to carry out these programs as specified per year? Will they work weekends for free?

G-4-11

11) Short term vs. long term uses- Since there is sufficient land zoned now to accomodate the anticipated population increases to the year 2040. Why are the new growth areas believed to be justified now? If one of the objectives of this document is to "Provide direction to guide growth in the County so that the grandchildren of current Placer County residents and their families' futures are protected." They would best be served by giving them the freedom to open the ag areas for new growth when they decide it is necessary. This document can barely evaluate the implications of the new growth areas at the end of its expected usefulness (2010) let alone predict the impacts at 2040 (dEIR 2.5). Yet, three board members insist on promoting four new growth areas now. One of the purposes of CEQA is to disclose to the public the reasons why a governmental agency approved a project. And as stated by the court in People v. County of Kern "if CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees." Then "the EIR process protects not only the environment but also informed selfgovernment." So I ask again that this dEIR state the reasons why the proposed project (specifically the new growth areas) is believed by the County to be justified now. CEQA guidelines section 15126(e) the dEIR does not answer that question.

G-4-12

12)Growth inducing impacts- CEQA requires that this document discuss the ways in which the proposed project could foster growth simply stating that it is growth inducing doesn't answer the question. Also see traffic discussion.

G-4-13

13) Since land development options have not been removed in other areas, opening up new areas can hardly be described as directing growth. The fact is this action merely disperses growth. The inclusion of these new growth areas is in direct conflict with the Planning and Zoning Law section 65561a-e I'll quote b "That discouraging premature and unnecessary conversion of open-space land to urban uses is a matter of public interest and will be of benefit to urban dwellers because it will discourage non-contiguous development patterns which unnecessarily increase the costs of community services to community residents." What are the rough estimated costs of extending the water, sewer and roads to the new growth areas and how many housing units would have to be created in order to make these areas economically feasible?

G-4-14

Patricia Gibbs



G-5 Ron Bakken (11/12/93)

G-5-1. Existing zoning is sufficient to accommodate projected growth, so *Draft Plan's* new growth areas are unnecessary

Comment noted; no response necessary.

G-5-2. Draft EIR's stated project objective of 500,000 population cap is inconsistent with *Draft Plan's* holding capacity, so some property owners must be losing entitlements

This statement misinterprets the cited material. The General Plan does not call for taking of "entitlements" from property owners.

G-5-3. *Draft EIR's* alternative analysis is not adequate

Refer to common response #1.

G-5-4. *Draft Plan* Table 1-2 needs review and evaluation; it is mathematically incorrect and arbitrary

The County disagrees with this assertion; the table is correct.

G-5-5. *Draft Plan's* land use standards for buffer zones inadequate because they apply only to specific plan areas and are too small

The Policy Document's buffer standards will apply countywide. The County feels the habitat buffer is adequate.

Placer County Planning Dept.
11414 B Ave.
Auburn, CA 95603

PLACER COUNTY
RECEIVED
November 12, 1993

NOV 15 1993

re: Draft Placer County General Plan and EIR
attn.: Loren Clark
PLANNING DEPARTMENT

I would like to make the following comments concerning the Draft Placer County General Plan and the draft EIR.

1. The existing zoning within the cities, and the unincorporated area is adequate to provide residential development within the county for the next 60 years, what realistic non political justification can be presented for creating new urban growth areas at this time?

- a. The proposed draft Plan is nothing more than a promotional document for several new technically unwarranted specific projects. This is a parochial document written to support and justify a political decision to support major development speculation in the southwestern part of the County. This is NOT a GENERAL PLAN for all of the County.
- b. This plan limits the ability of the cities to grow at their own rate, by taking away the cities rights of self control as it relates to growth.
- c. It promotes and stimulates urban development beyond the actual need, by uses an artificial 40 year projection of need to indicate the need for increased residential zoning by 2010.
- d. This draft plan is growth inducing by stimulating excessive unwarranted urban growth in existing rural areas where land is relatively cheap to speculate with.

G-5-1

2. Existing zoning provides a holding capacity of about 565,000 population. The new urban growth areas propose an additional 76,000 population for a total population of 641,000.

- a. If a maximum residential capacity of 500,000 is established, and the density proposed for the new growth areas is accepted, how and where will existing residential zoning be reduced to enable the new residential zoning capacity to remain within the cap? Who will lose existing entitlements?
- b. What are the fiscal impacts on our local developers, and on existing property owners and their entitlements if existing zoning is reduced to accommodate the specific plans?

G-5-2

3. CEQA requires reasonable alternatives, an environmentally superior alternative, and discussion focused on eliminating or reducing impacts.

- a. The fails to identify details of the difference in impacts of the various options, and fails to provide a comparison analysis, since the the draft EIR focuses exclusively on the project.
- b. It fails to identify a environmentally superior alternative.
- c. It fails to provide enough details to enable a reasoned choice and informed decision making.

G-5-3

4. Table I-2, page 17 of the Plan needs some review and evaluation. This table should be mathematically correct and it should not use arbitrary figures. It looks like the numbers were picked to make things convenient.

- a. If the minimum lot area for LDR is 10,000 sq. ft., how can you get 5 dwelling units per net acre? The lot size of 10,000 sq. ft. is appropriate for LDR, but the maximum should be 4 du.
- b. How do you arrive at 3,500 minimum lot area for MDR & HDR? The draft Zoning Ordinance indicates the minimum size for both to be 6,000 sq. ft. The minimum combing district in the draft zoning ordinance is 10,000 sq. ft., and there is a -DL as low as 2323 for RM.

G-5-4

5. The land use standards for buffer zones are a good example of why the plan is nothing more than a promotional document for the specific plans.

- a. It implies that buffers will only be applied in the specific plan areas. Buffers are a good method to provide separation, but the concept needs to be a part of the "General Plan" not just for the specific plans.
- b. The buffer dimensions in the land use standards for buffer zones are ridiculously small, and should be increased significantly. As an example, the sensitive habitat buffer should be a minimum width of 100 ft. on each side of the habitat to be protected, with a minimum of 50 ft. on one side, only were the narrowest width can be justified due to natural constraints.

G-5-5

Thank you for considering my comments, and please provide me with a copy of the final EIR and General Plan.



Ron Bakken
6315 Long Meadow Rd.
Granite Bay, CA 95746

G-6 Donald Ryan (11/15/93)

G-6-1. *Draft Plan's* policies relating to agriculture and resources are too inflexible

The County feels that the Policy Document strikes an appropriate balance between the specificity necessary to achieve County objectives and protect the residents and property owners of Placer County and the generality necessary to allow County officials to exercise appropriate latitude and flexibility in its ongoing implementation.

G-6-2. Attachment of recommended revisions to *Draft Plan* policies and programs

The County appreciates the commentor's efforts, but feels that the Draft Policy Document's language is more appropriate than the revised language suggested.

DONALD V. RYAN, D.D.S., INC.
2804 N. EL DORADO STREET
SUITE C
STOCKTON, CALIFORNIA 95207
TELEPHONE (209) 957-8807

Placer County Board of Supervisors
Placer County Planning Commissioners
Dewitt Center
Auburn Ca.

Re: General Plan Draft Document

Dear Supervisors and Commissioners,

I have recently reviewed the draft general plan with respect to the agricultural and resources section and would like to comment on it. Although I believe that protection of Ag and forestry land is important I believe the draft plan is too narrow in its focus and ultimately would be detrimental to the resources it intends to protect. Additionally, smaller rural communities, which need flexibility in their planning process, would be hindered by many of the proposed policies. If the planning process is to remain viable I think that there must be flexibility built into the policies to protect both the private and public sector from abuses and unforeseen changes which will inevitably occur.

As an example of some of the areas which I feel need to be addressed, the draft plan has several terms such as "the county shall protect"; "the county shall insure; the county shall maintain; the county shall discourage; etc. These terms are used in conjunction with policies which will have lasting effects on private property ownership and the planning process. Also, they create situations which will require expenditures which, without more taxes, would be impossible to implement, given the monetary crisis the county faces. I firmly believe that the key to any planning process is that flexibility be maintained and that good long range planning be fostered rather than hindered by inflexible statements of policy designed to protect resources and zoning designations. Instead of the use of some of the above terms I would encourage adoption of more terminology in the vein of "the county shall promote, encourage, and work with private landowners and communities, etc. to set a mood of cooperation rather than confrontation as I believe the current draft has proposed.

G-6-1

As an example of the terminology which I feel needs to be reviewed is the policy 7.A.1 which states "the county shall protect agriculturally-designated areas from conversion to non-agricultural uses." This policy statement is detrimental to its own stated purpose because of its inflexibility. Consider this scenario: A community has three parcels of property being considered for conversion to rural residential zoning. All are ag zoned but differ in that one is immediately adjacent to an existing community, one has class 5 soils which are not being farmed but is located a mile from town, and the last is not an economically viable since the soils and water will not support crops on which the owner can

make a living (or make money for that matter). Under the current draft policy all these parcels "shall be protected from conversion" to non-agricultural uses. It certainly makes sense to consider the individual merit of each of these properties and to make a determination as to which, if any, would be the best choice for conversion. Likewise, the particular community, whether it be a city, suburban, or rural community must be considered. Many of these small communities need the flexibility to rezone in order to help alleviate crowded schools, provide better fire and police services, and to create the infrastructure to make for a better community. In a nutshell, they need money to improve their community and increased property values as a result of rezoning in conjunction with thoughtful planning is one possible solution. Surely, to adopt a position countywide to protect Ag lands without regard of the particular local needs and desires would not be in the best interest of the county or the community. This is not to say that haphazard conversion should be allowed, but rather to encourage a policy which will promote the best in planning without restraining the quality of the process by assuming that any property per say must be excluded because of a previous zoning designation. Certainly the purpose of a new general plan is to allow this type of discussion rather than to hinder it.

G-6-1

There are several other areas of the draft plan which I have noted are "cast in concrete" (for lack of better terminology) and I have gone through all the policies. I have rewritten several of the policies to what I feel would make for a common sense approach to planning and have enclosed those for your review. I think that these redrafted policies will give you some food for thought.

Thank you for taking your time to read this letter and the enclosed recommendations. I know that this is a long difficult process and I am sure that you will give it your full attention.

Sincerely,


Donald V. Ryan

AGRICULTURAL AND FORESTRY RESOURCES

GOAL: TO PROVIDE FOR LONG TERM PROTECTION AND CONSERVATION OF AGRICULTURAL RESOURCES

7.A.1. THE COUNTY SHALL PROTECT AGRICULTURALLY PRODUCTIVE AND ZONED PROPERTY BY ENCOURAGEMENT OF ZONING WHICH WILL PRESERVE AND PROTECT THE CURRENT AGRICULTURAL RESOURCES, WHILE MAINTAINING THE FLEXIBILITY NECESSARY TO PROTECT FUTURE ALTERNATIVE LAND USAGE.

7.A.2 THE COUNTY SHALL ENCOURAGE AG PARCELS ADJACENT TO URBAN/SUBURBAN/RURAL COMMUNITIES TO MAINTAIN AN ECONOMICALLY VIABLE SIZE SUCH THAT AG PROPERTY WILL BE ABLE TO SUPPORT ITSELF. ADDITIONALLY, THE COUNTY SHALL DISCOURAGE SUBDIVISION OF LARGER PARCELS INTO SMALLER UNITS, EXCEPT AS THE RESULT OF THE COMMUNITY PLAN PROCESS, OR MASTER PLANNED COMMUNITIES.

7.A.3 THE COUNTY SHALL ENCOURAGE MULTIPLE AG USES OF AG LANDS IN ORDER TO MAINTAIN ECONOMIC VIABILITY.

7.A.4 THE COUNTY SHALL ENCOURAGE PROTECTION FROM FLOODING OF ALL PUBLIC AND PRIVATE FARMLAND THROUGH PROGRAMS OF LEVY MAINTENANCE AND COOPERATION OF THE COUNTY AG OFFICE,

7.A.5. OK

7.A.6 OK

7.A.7 THE COUNTY SHALL ENCOURAGE THE MAINTENANCE OF AG ZONING WHERE THE PARCELS ARE ECONOMICALLY VIABLE AND ARE LOCATED SUCH THAT MAINTENANCE OF THE PARCELS IN THE AGRICULTURAL ZONE WILL NOT JEOPARDIZE THE LOCAL PLANNING PROCESS.

7.A.8 THE COUNTY SHALL ENCOURAGE FUTURE DEVELOPMENT IN AREAS WHICH ARE INFILL PARCELS AND/OR ADJACENT TO EXISTING URBAN/SUBURBAN/RURAL COMMUNITIES.

7.A.9 THE COUNTY SHALL ENCOURAGE LOT LINE ADJUSTMENTS WITHIN AG ZONING TO PRESERVE ECONOMICALLY VIABLE PARCELS OR TO LOCALIZE PARCELS IN ORDER TO MINIMIZE IMPACT ON AG LANDS.

7.A.10 THE COUNTY SHALL SUPPORT CONCOMITANT USAGE IN AG ZONED PARCELS PROVIDED THE RESULTANT USE WILL NOT MATERIALLY EFFECT THE INTENTION TO MAINTAIN AGRICULTURAL THE NATURE OF THE

G-6-2

7.A.11 THE COUNTY SHALL SUPPORT PRIVATE CONSERVATION EASEMENTS. FURTHERMORE, THE COUNTY SHALL ENCOURAGE CONSERVATION EASEMENTS AS MITIGATION OF ADVERSE IMPACTS ON OPEN SPACE, WILDLIFE, AND RECREATION RESULTING FROM REZONING OF AG LAND.

7.A.12 OK

7.A.13 OK

IMPLEMENTATION

7.1 THE COUNTY SHALL NOT ACCEPT APPLICATIONS FOR AMENDMENTS TO THE GENERAL PLAN EXCEPT AS TO THE FORMATION OF COMMUNITY PLANS AND/OR TO ANY SPECIFIC PROPERTY WHICH SHALL ASK TO BE EXEMPTED FROM THIS RESTRICTION WITH 60 DAYS OF RATIFICATION OF THE GENERAL PLAN.

7.2 ADD: THOSE PROPERTIES CURRENTLY UNDER TERMINATION PHASES OF WILLIAMSON AND SIMILAR CONTRACTS SHALL BE EXEMPT FROM THIS PROVISION.

G-6-2

7.3 OK

7.4 THE COUNTY SHALL PERMIT TRANSFER OF DEVELOPMENT RIGHTS WITHIN AREAS OF THE SAME COMMUNITY PLAN, SUBJECT TO BOARD APPROVAL, IN ORDER TO PROTECT AG VIABLE UNITS AND TO DISCOURAGE SPOT DEVELOPMENT, WHILE AT THE SAME TIME PROMOTING THE GOALS OF THE COMMUNITY PLAN PROCESS.

LAND USE CONFLICTS

7.B.1 THE COUNTY SHALL GIVE PREFERENCE TO DEVELOPMENT WHEREIN A NATURAL BUFFER EXIST BETWEEN DIFFERENT LAND USAGES. SUCH NATURAL BUFFERS SHALL INCLUDE RIVERS, STREAMS, STEEP SLOPES, OR OTHER UNDEVELOPABLE PROPERTY AND THE PRESENCE OF LANDS HELD IN CONSERVANCY OR BY THE US GOVERNMENT OR ITS AGENCIES.

7.B.2 OK

7.B.3 OK

7.B.4 OK

7.B.5 OK

ECONOMIC VIABILITY OF AGRICULTURE

7.C.1. THRU 7.C.10 ARE ALL OK

AGRICULTURE WATER

GOAL 7.D: TO MAXIMIZE THE USE OF WATER FOR AG USES AND TO ENSURE AN ADEQUATE WATER SUPPLY.

7.D.1 THRU 7.D.5 ARE OK.

7.D.6 THE COUNTY SHALL REQUIRE THAT ALL FUTURE CHANGES IN LAND USAGE FROM AG USAGES SHALL DEMONSTRATE ADEQUATE WATER RESOURCES PRIOR TO APPROVAL OF ANY CHANGE IN ZONING.

7.D.7 OK

G-6-2

FORESTRY RESOURCES

GOAL OK

POLICIES

7.E.1 OK

7.E.2 THE COUNTY SHALL SUPPORT DEVELOPMENT WHICH SHALL CONCENTRATE DENSITIES SO AS TO MINIMIZE ADVERSE EFFECTS ON LARGER SECTIONS OF FORESTLANDS.

7.E.3. OK

7.E.4 OK

7.E.5 OK

7.E.6 OK

IMPLEMENTATION

COUNTY SHALL WORK CLOSELY WITH THE CDF AND FIRE DEPARTMENT INVOLVING TIMBER

7.7 ANY INVENTORIES OF YEW AND OLD GROWTH FOREST SHOULD BE ADDRESS BY THE COUNTY AT THE TIME OF APPLICATION BY A LANDOWNER FOR CONVERSION OF TIMBERLANDS.

7.8 OK

7.9 OK

7.10 THE COUNTY SHALL ENCOURAGE PLANNING WHICH SHALL PROVIDE FOR MOST EFFICIENT USAGE OF LAND WITH RESPECT TO ALL SERVICES INCLUDING FIRE PROTECTION, WATER CONSERVATION, TRAFFIC CONGESTION ETC.

7.11 THE COUNTY SHALL ENCOURAGE THE USE OF EXISTING ROADS TO ACCOMMODATE ANY FUTURE DEVELOPMENT. THOSE PARCELS WHICH ARE ALREADY SERVED BY PUBLIC AND/OR PRIVATE ROADS SHALL BE CONSIDERED MORE ACCEPTABLE FOR CONVERSION FROM AG TO OTHER LAND USES.

G-6-2

H. Community Organizations

H-1 Placer County Coalition of Community Associations (10/28/93)

H-1-1. Given short review period and stepped-up speed of process, *Draft Plan* and *Draft EIR* may not allow informed decision

The 45-day review period for the Draft EIR provided by the County complies with the requirements of State law. The Board of Supervisors and Planning Commission extended by several months the public comment period on the Draft General Plan. The description of the General Plan preparation process in Chapter 1 of the FEIR describes the Board and Commission hearings.

H-1-2. There is sufficient land zoned for development to accommodate growth, so new growth areas are unnecessary

See common response #11.

H-1-3. Because of *Draft Plan* designation of new growth areas, *Draft EIR* fails in several areas.

The Draft EIR addresses these concerns; furthermore the commentor fails to provide any support to back its assertions.

H-1-4. Issues and Options Report did not address concerns related to new growth areas.

The County feels that the Issues and Options Report, and the hearings conducted by the County on the report, provided the general public and representatives of the county's cities sufficient opportunity to express concerns and ask questions. In addition, the Planning Commission and Board of Supervisors hearings on the Draft General Plan provided additional opportunities for such participation.

H-1-5. How would *Draft EIR's* 8 identified potentially significant or significant impact areas be affected by removal of new growth areas?

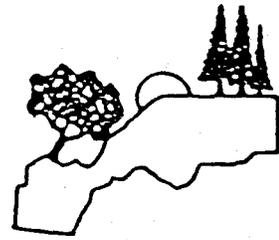
Chapter 10 of the Final EIR addresses this question.

PLACER COUNTY COALITION

of Community Associations

P.O. Box 2765 COUNTY
Granite Bay, CA 95745

1989



Placer County Planning Commission
11404 B Avenue
Auburn, Ca. 95603

PLACER COUNTY PLANNING COMMISSION

RE: PLACER COUNTY GENERAL PLAN UPDATE AND DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Commissioners:

Given the short time to review these documents and the stepped up speed in which this General Plan update has been directed by the Board of Supervisors, we question whether the information is adequate to allow a reasonable person to make an informed decision. The Environmental Impact Report as part of the General Plan should be used to establish the environmental framework for the growth in Placer County for the next twenty or so years. The need for a clear, consistent and thorough guide is essential. This is even more necessary since the direction of the Board of Supervisors to rezone agricultural land into at least four new growth areas. There is currently sufficient land zoned for continued planned growth within the cities and county to increase the 1993 population of 196,000+ to 600,000+, which is in excess of the State of California's population projections for the year 2040 of 473,200. To include four new growth areas, after the hearings on the Issues and Options Report is such a major change and unsubstantiated. The cities have planned for the growth where it is generally more efficient and cost effective. The county should not adopt and updated plan that would be just, "adequate and legally defensible, and will sacrifice detail and thoroughness", as stated by consultant J.L. Mintier, just to meet a deadline that seems not to be set for reasons other than political. Why are they adding four new growth areas? Who will benefit when the agricultural land is rezoned to residential, will it be a farmer, if not who? Should we forfeit the integrity of our Agricultural Element of 1989 for these new growth areas?

H-1-1

H-1-2

The Draft EIR by including the new growth areas fails to meet the general concepts:

1. What are the potential, significant environmental effects?
2. How can the environmental damage be avoided or significantly reduced?
3. What are the alternatives or mitigation measures?
4. Why have the new growth areas been included?

H-1-3

During the various hearings of the Issues and Options Report many from the general public and the cities of Roseville, Rocklin and Lincoln had questions and concerns regarding the new towns or growth areas. As an informational document these questions and concerns were not addressed. What are the benefits to Placer County for these new growth areas in place of agricultural lands?

H-1-4

The Draft EIR Impact Summary states eight major areas will result in potentially significantly, or significant adverse impacts and that there are no available measures to mitigate these impacts. How would these major areas be affected if the four growth areas were not rezoned or included? What is the reason for converting agricultural lands to rooftops and asphalt? What are the cumulative impacts and cost to the Placer County residents and their existing quality of life?

H-1-5

We hereby object to approval of this Draft EIR in its present form. We submit our comments for incorporating into the official record of proceedings. Thank you for the opportunity to provide these comments.

Sincerely,

M. D. STINSON, PRES.

H-2 Rio Linda Elverta Residents for Quality Rural Living (10/29/93)

H-2-1. *Draft Plan* policies are vague and not sufficiently detailed, particularly with respect to new growth areas

The Policy Document strikes an appropriate balance between the specificity necessary to achieve County objectives and protect the residents and property owners of Placer County and the generality necessary to allow County officials to exercise appropriate latitude and flexibility in its ongoing implementation.

H-2-2. *Draft Plan* fails to adequately describe alternative locations for new growth areas

In reviewing the Issues and Options Report, the Board of Supervisors discussed alternative locations for major new development and directed County Staff to include the areas appearing on the Draft Land Use Diagram.

H-2-3. *Draft Plan* fails to adequately address impacts of new growth areas on the Rio Linda/Elverta area of Sacramento County

The commentor provides no specifics in support of this assertion; no response necessary.

H-2-4. *Draft EIR* does not demonstrate that *Draft Plan* has considered efficient use of land or natural resources

Refer to common response #1.

H-2-5. *Draft EIR* is vague and fails to identify specific and irreversible impacts and mitigation measures

The EIR addresses the issues the commentor mentions at a level of detail appropriate for a countywide general plan.

H-2-6. *Draft EIR* does not describe performance standards in enough detail

See response to comment H-2-5.

H-2-7. *Draft Plan* is inconsistent with Draft Sacramento County General Plan

Comment noted; no response necessary.

H-2-8. *Draft EIR* fails to adequately address transportation alternatives

See response to comment H-2-5.

H-2-9. *Draft Plan* policies do not address how Placer County plans to notify communities in adjacent counties of development applications

The Draft Policy Document includes policies promoting cooperation and communication with other public agencies at all levels of government, including adjacent counties.

H-2-10. *Draft EIR fails to address impacts of new growth areas on adjacent counties*

See response to comment H-2-5.

H-2-11. *Draft EIR fails to address how services will be efficiently provided and how sensitive environmental resources will be avoided*

The County feels that the EIR adequately addresses these issues.

H-2-12. *Draft Plan and Draft EIR do not describe how new growth areas will address housing needs of all income groups*

The Policy Document and the adopted Housing Element include numerous provisions for affordable housing for all of Placer County.

H-2-13. *Draft Plan and Draft EIR fail to describe or establish performance standards to minimize effects on adjacent land uses*

The County feels that the EIR adequately addresses this issue.

H-2-14. *Draft Plan policies relating to industrial development in new growth areas are vague, so they negate jobs-housing policies*

The County feels that the EIR adequately addresses this issue.

H-2-15. *Draft EIR fails to adequately mitigate conversion of agricultural land*

The EIR discloses the potential loss of agricultural land and production, although in most cases the conversion will not be the direct result of development permitted by the Countywide General Plan. Furthermore, as noted above, the Policy Document includes policies promoting cooperation and communication with other public agencies at all levels of government, including adjacent counties, as well as a program calling for the study of transfer of development rights (TDR) techniques.

H-2-16. *Draft EIR does not describe natural resource impacts in new growth areas in sufficient detail*

The County feels that the EIR adequately addresses this issue.

H-2-17. *Draft Plan does not adequately address visual and scenic resources in new growth areas*

The County feels that the Policy Document adequately addresses this issue.

H-2-18. *Draft Plan does not include specific policies for development in new growth areas*

This assertion is incorrect; the Draft Policy Document did include specific policies related to new growth areas, although the final Plan has eliminated the Placer Villages and Stanford Ranch new growth areas.

H-2-19 *Draft Plan* transportation and circulation section does not describe performance standards and other detailed mitigation measures

The Draft Policy Document includes policies and programs addressing the full range of transportation-related concerns, including those the commentor mentions.

H-2-20. *Draft Plan* and *Draft EIR* fail to adequately address the effects of development in new growth areas on groundwater and surface water

Refer to common response #9.

H-2-21. *Draft Plan* and *Draft EIR* fail to adequately address impact of development in new growth areas on downstream water contamination and flooding

The Draft EIR addresses these concerns at a level of specificity appropriate for a countywide general plan.

H-2-22. *Draft Plan* and *Draft EIR* do not adequately address loss of wildlife species and their associated habitat

The EIR addresses these concerns at a level of specificity appropriate for a countywide general plan.

H-2-23. *Draft Plan* does not include policies to compensate existing residents for the loss of quality of life and rural character

While the General Plan and EIR do not address an issue called "quality of life," the aggregation of all the policy and program statements and the EIR's impact analyses provide a comprehensive view of the potential effects of development under the General Plan.

H-2-24. *Draft Plan* and *Draft EIR* fail to adequately address air quality impacts

The EIR addresses air quality impacts at a level appropriate for a countywide general plan EIR, including a discussion of cumulative impacts.

H-2-25. If County chooses to adopt Plan, EIR will have to be expanded

Comments noted; no response necessary.

EIR file

Rio Linda Elverta Residents for Quality Rural Living

*a member organization of Sacramento County Alliance of Neighborhoods
QRL, PO Box 334, Elverta Ca. 95626*

October 29, 1993

Placer County Planning Department
Placer County Planning Commission
Placer County Board of Supervisors
11414 B Avenue
Auburn Ca. 95603
Attn.: Mr. Loren Clark, Senior Planner

PLACER COUNTY
DATE RECEIVED
NOV 01 1993
PLANNING DEPARTMENT

Subject : Review and Comment on Placer County General Plan Update

General Comments

The Placer County General Plan Update of 1993 herein called "Plan" is composed of at least two volumes, the draft policy document and the draft environmental impact report (DEIR). The policy document is divided into County Wide Land Use Diagram, Goals Policies, Standards, and Specific Development Standards for new growth areas. The DEIR is divided into 10 chapters which respond to various legal requirements. According to Government Code the plan is required to address seven elements including land use, transportation, housing, conservation, open space noise and safety. The proposed plan will attempt to project the growth of Placer county for at least 10 or 20 years. The update process is designed to provide citizens with information about their community and opportunity to participate in setting goals, and determining policies and standards for the proposed changes in the Plan. In addition the plan is designed to 1) develop and protect the community and 2) be a forum to resolve conflicts among competing interest and values. Such values, environmental, social and economic, set the framework that promotes unique communities within Placer, Sacramento or any County within our state. Due to the adjacent or close proximity to Sacramento County of the proposed new growth elements Placer Villages and the Dry Creek Specific Planning Areas (DVDC) within the Plan and subsequent impacts to our community we have

reviewed the plan, prepared comments and request a response to those comments. We may have additional comments and will submit them as required.

Land Use Policies and DEIR Comments

The Land Use Policies are vague and fail to adequately describe in sufficient detail the specific performance standards required or to be used for specific locations for the massive buildout of Placer County and specifically each of the proposed new growth areas. The DEIR fails to adequately describe in sufficient detail the proposed new growth areas. Because the specific plan concept prevails, the general plan is insufficient in detail, for example performance standards, to promote the specific plans as required by government code. Such lack of planning will result in disastrous and inconsistent land use planning consequences at the specific plan level and will circumvent the public input process as required. How was the new growth areas population mandates determined. The plan or the DEIR failed to adequately describe the methods.

H-2-1

For Example :

General Land Use

Policy 1.A.1 states that the county will promote the efficient use of land and natural resources.

The plan fails to adequately describe alternatives locations for the proposed massive buildout in the Western Placer New Growth Areas. The proposed new growth areas will create tremendous infrastructure impacts to our adjacent rural community. The plan fails to consider our communities interest in remaining rural when proposing the new growth areas as adjacent land uses. The plan fails to adequately describe the impacts to our community.

H-2-2

H-2-3

No alternatives have been described in DEIR to demonstrate that the county has considered efficient use of land or natural resources. Please define "efficient" in relationship to land use. This term as used in the planning document is vague and lacks specificity; consider for example the natural resources, vernal pools, wetlands, migratory waterfowl, or raptors species -how will the animals or plants be told to be efficient?

H-2-4

The plan fails to define efficient use relative to public infrastructure or natural resources. This is inconsistent and conflicts with CEQA. Consequently the DEIR is vague and fails

H-2-5

to identify specific and irreversible impacts, consequences and proposed methods for mitigation relating to proposed new growth.

H-2-5

Policy 1.A.3. Placer County has designated new growth areas, urban, suburban and rural areas to identify where development will be accommodated and where infrastructure and services will be provided. The DEIR is vague and fails to adequately describe in sufficient detail the performance standards relating to infrastructure and services required for the DVDC specific planning areas. Consequently the public has no basis to determine if the planning and mitigation policies and practice, necessary for accommodation of the proposed new growth is adequate. For example Placer County is proposing on page 3.2 table 3-1 to accommodate the addition of 29,800 dwelling units adjacent to the Sacramento County Boundary in the general area west of Walerga Road which are inconsistent land use patterns compared to those land use patterns designated by the Sacramento County General Plan Update directly south of the county line. On one side of the border you have urban high density growth and on the other you have rural zoning (low density) areas. Some planners may call this type of growth leap frog development.

H-2-6

H-2-7

Policy 1.B. Residential Land Use and related policies attempt to promote the use of high density residential areas located along major transportation corridors and transit routes. and to accommodate the needs of all income groups expected to reside in Placer County. The policies and DEIR are vague and fail to adequately describe the transportation alternatives, in terms of specific performance standards, when compared the use of privately operated vehicles. The DEIR fails to adequately describe, plan, or anticipate the impact of the 60,000 plus new gasoline or diesel powered vehicles that will inundate the West Placer County Area (WPCA) as a result of the DVDC specific plan areas.

H-2-8

The policies fail to adequately address how Placer County plans to notify the impacted communities south and west (Sacramento and Sutter County) of the development applications. The DEIR fails to adequately describe the problem nor does it consider performance standards required to mitigate the effects. The plan fails to consider the cost factors associated with DVDC specific plan areas.

H-2-9
H-2-10

The DEIR page 3.3 and the land use policies fail to adequately describe how services will be efficiently provided and how sensitive environmental resources will not be adversely

H-2-11

affected due to the 28,000 new residences within the WPCA. The policies, DEIR and the impact mitigation measures are incompatible.

H-2-11

The policies and the DEIR relating to the DVDC specific plans fail to adequately describe how they will meet the housing needs of all income groups. Consider for example the track record-history of the major developer/speculators who have invested in WPCA and the market projections for new home construction. The planning commission and Planning department will be practicing economic discrimination based on the construction of first time low income homes to satisfy the industry and infrastructure cost and benefits. The plan fails to adequately describe the methods to be used the mix the economic groups and ensure consistent planning.

H-2-12

The policies and DEIR are inadequate and vague and fail to describe or establish effective performance standards to demonstrate how Placer County will minimize its effect on adjoining land uses. Consider for example the impact of 28,000 new residences on the Sacramento County rural agricultural communities. Consider the maintenance of surface water quality, down stream flooding, maintenance of vernal pools, or the migratory flight paths within the sphere of WPCA.

H-2-13

Industrial Land Use

The policies relating to industrial land use are vague and fail to specify within the proposed DVDC planning areas which sites will be slated for industrial land use. Prior practices relating to this land zoned for industry indicate that this zoning is not as profitable for developer/speculators and therefore not developed as planned. This would negate the policies relating to matching and promoting job and housing demands within specific planning areas. Specific policies relating to this area must be established.

H-2-14

Agricultural Land Use

The goals and policies as identified under Agricultural Land Use fail to adequately describe the mitigation efforts required to convert the existing farmland for the DVDC specific plan areas. The DEIR states that over 10,000 acres of prime and unique agricultural land will be converted to residential use. Our experience to date indicates that certain landowners have failed to maintain the agricultural practices and left prime agricultural land fallow. Properties adjacent to the Sacramento County line have been in

H-2-15

full agricultural use until two years ago when specific property owners purchased the land and then proceeded to request rezone of the land to domestic use. The Ag land use policies fail to ensure the WPCA's rural-agricultural industry is maintained and also conflict with land use designations in adjacent county areas. The resulting loss of Ag land will result in major economic and environmental impacts to WPAC and our community. The plan fails to adequately describe the impacts created by this rezone and the methods required to mitigate this major re-focus of land use within WPAC and specifically DVDC. Our community will be within the sphere of influence of these unwanted high density urban sprawl areas. How does the Placer County Government plan to compensate the residence of this area due to the unmitigated impacts created by the DVDC specific planning areas. The policies and Plan fail to address what specific performance standards are necessary to mitigate the impact on residence within adjoining communities of Sutter and Sacramento Counties. The DEIR fails to propose establish performance standards related to and mandate a transferable development rights program to maintain and promote the use of farm/agriculture land. The plan fails to provide alternative locations for the proposed new growth areas in the WPAC DCDV. Such proposed growth which will result in the continued loss of agricultural land due to urban sprawl.

H-2-15

Natural Resources Open Space Habitat and Wildlife Resources

As proposed the WPAC/DVDC specific planning areas will result in catastrophic and irreversible damage to the natural resources of WPAC.

The policies fail to adequately describe mitigation efforts and performance standards to ensure that the animal populations are maintained at existing levels. The DEIR is vague and fails to adequately describe performance standards relating to mitigation of the impacts .

For example Policy 1.H.2 requires that the development be planned and designed to avoid areas rich in wildlife or fragile ecological nature the DEIR fails to describe and define in detail the wildlife and ecological impacts within WPAC/ DVDC.

The plan and policies must be revised to address in sufficient detail the impacts and mandatory mitigation associated with the DVDC developments.

The plan fails to adequately describe in detail where and how surface water will be supplied to WPAC/DVDC specific planning areas. The plan fails to describe how much surface water will be required for 28,000 homes and the other proposed land uses.

H-2-16

Visual and Scenic Resources

The plan fails to adequately describe the results of an additional 28,000 homes and 60,000 automobiles will have on the surrounding communities and or successful mitigation efforts to eliminate any additional impacts. The plan fails to describe performance standards for DVDC that must be considered to mitigate the effects.

The discussion of scenic routes in the WPAC is inadequate and fails to describe in specific detail the selected areas designated as "Scenic". How were the PAC communities informed of the scenic designations. The policies fail to describe specific performance standards to be adopted for WPAC and the DVDC specific plan areas relating to scenic designations. This will result in poor planning, and undesirable urban sprawl effects.

H-2-17

New Growth Areas

The specific policies within this area are vague, inadequate and fail to describe in sufficient detail the expectations required of developers prior to rezone. Performance standards must be developed as part of the General plan, not an after thought.

H-2-18

Transportation and Circulation

The transportation plan promotes the use of privately operated vehicles at the expense of the public's desire for maintained or improved air quality. The policies are vague, non effective and lack any specific performance mandates for new growth. There are no performance standards which mandate the use of these criteria for any specific plan in the WPAC DVDC.

The transportation/circulation plan fails to adequately describe performance standards and other detailed mitigation efforts required to reduce the impact of 60,000 additional cars on the WPAC/DVDC and our northern Sacramento County community. The Transit policies are vague and non-mandatory, that is to say there are no specific performance standards which mandate alternative transportation plans. There are no specific light rail systems mandated within the WPAC/DVDC areas. The Transit Oriented Community (TOD) concept is just that a concept because the general plan and policies lack specific performance standards relating to TOD designations with the DVDC growth areas. The result of these vague performance standards will result in urban sprawl and severe impacts on existing road and other supporting infrastructure. The plan fails to establish effective performance standards which mandate east west light rail (within Dry Creek)as well as north south (Placer Villages). This lack of performance standards planning will result in urban sprawl almost identical to the San Fernando

H-2-19

Valley of Southern California. Transportation performance standards should be tied into economic growth policies to ensure that rail systems TODS and economic work centers are adjacent or along similar rail corridors.

The non motorized transportation policies are non effective and lack any specific performance mandates for new growth. There are no performance standards which mandate the use of these criteria for any specific plan in the WPAC DVDC. The policies fail to adequately describe the efforts required to mitigate the effects of the proposed new developments on the surrounding Sacramento and Sutter County communities.

H-2-19

Water Supply and Delivery / Storm water runoff

The policies relating to water supply and delivery are vague and fail to establish effective performance mandates relating to water supplies. This poor policy development will result in the overdraft of ground water supplies, a renewed mandate to build the Auburn Dam, at the cost of billions of dollars, and no assurances that the entitlements are and will be available for future proposed growth. The policies and DEIR fail to accurately describe the availability and quantity of surface water to be used to support the DVDC new growth areas. The polices and DEIR fail to adequately address the consequences of using ground water for the 28,000 new homes and industries for the WPAC /DVDC proposed communities. The DEIR fails to adequately describe the consequences of the proposed DVDC new growth areas relating to water supplies. Our community currently has a serious ground water overdraft situation. Many areas of WPAC are overdrafted due to several conditions. No maps or other information was provided within the DEIR or policy document to describe the current WPAC DVDC community ground water levels. This information should be included in the DEIR as well as performance standards relating to surface water supplies. The plan and or the DEIR fail to describe the amounts of surface water available, entitlements, for the proposed WPAC/DVDC new growth areas. This is a serious oversight and must be quantified. The DEIR and policies fail to describe in sufficient detail the surface water entitlements available for the proposed new growth areas. Failure to provide this information to the public is a serious oversight. The policies and DEIR fail to describe the methods, cost and who will pay for the surface water supplies delivered to the WPAC/DVDC.

H-2-20

The DEIR and Policies fail to establish effective performance standards based on surface water availability for the proposed new growth areas. The DEIR fails to describe mandatory mitigation measures relating to ground water recharge or management.

The use of septic systems is a minor threat to ground water. The DEIR fails to adequately address the potential for ground water contamination from surface water runoff. The overdraft of the ground water is the most serious concern for future growth and development within WPAC. The DEIR and Policies fail to adequately describe the performance standards and mitigation measures required for the sustainable use and mitigation of ground water. Our community will protect its ground water supplies from encroachment. The proposed 28,000 plus homes and industries will result in catastrophic loss of ground water. We estimate at least 15,000 to 30,000 acre feet per year of ground water will be used to satisfy the proposed new growth areas. Our entire community uses less than 3000 acre feet of ground water annually. We have serious concerns about how much additional growth can be sustained without a water crisis. Placer County Planning Department has failed to communicate in good faith with the citizens within our community relating to the use and overdraft of ground water.

H-2-20

The DEIR and Policies fail to establish adequate performance standards relating to the study of the ground water and the lack of percolation criteria within the proposed new growth area. No data was provided within the DEIR which supports or refutes the ability to establish ground water recharge areas. There are no policies relating to the study of the soils to percolate and naturally recharge the ground water. For example, there are very few locations within our community which provide for ground water recharge. The majority of the recharge areas are adjacent to the Dry Creek, The WPAC DVDC new growth areas as proposed will pave over the recharge areas. Furthermore the DEIR fails to address the impact of the new growth areas on the storm water runoff contamination of Dry Creek and the contamination of the ground water during the recharge process.

Storm water Drainage/ Flooding and Dam Failure

The DEIR fails to adequately evaluate the impact of the WPAC DVDC new growth areas on the resulting downstream surface water contamination and flooding in our community. Clearly this is a grave oversight and may result in serious liability problems for Placer County's failure to address this issue. Performance standards are inadequate to compensate for the loss of open space in the new growth areas. This open space loss equates to increased water diverted downstream. Subsequent to this diversion it may

H-2-21

preclude the development of our community plan because Placer County has, by the proposed development, increased our flood zoned areas.

H-2-21

Wildlife species and Important habitat Open Space

As proposed the WPAC/DVDC will result in the loss of over 15,000 acres of rural farmland converted to residential use. This impact is not adequately quantified in terms of the environmental impact to the target species and other non-endangered species which comprise the native species within this area. The DEIR fails to describe the impact on migratory waterfowl and native predators and raptors in sufficient detail . Such detail is necessary to develop strategies for mitigation and effective performance standards to measure developers and speculators commitment to the planning process. The DEIR and Policies fail to establish adequate performance standards and safeguards for open spaces, or mitigation efforts for habitat conservation in the proposed growth areas. Once this conversion of open rural farmland takes place the impacts on our community will be significant. The DEIR fails to describe and quantify the impact of this growth on our community's wildlife species.

H-2-22

The Swainson's hawk uses this WPAC DVDC area for breeding and food gathering. Burrowing owls, a threatened species, are found throughout the WPAC. The plan policies and DEIR fail to address adequate mitigation measures or performance standards to maintain the existing populations at current levels. The plan fails to consider the impacts to the Wildlife species located in adjacent Sacramento and Sutter communities as a result of the WPAC and DVDC new growth areas. The plan fails to describe the vernal pool locations within the WPAC and clearly does not adequately address the mitigation efforts required by the Federal and State Government mandates. The Policies and DEIR fail to establish effective performance standards relating to these areas. We are opposed to habitat conversion without measurable performance, compensation and mitigation standards in place.

Policies 1.A.2. ,1.F.1. 1.F.2., , are inconsistent with the overall land use strategy. This policy, while good in intent ,lacks specific performance criteria to judge the outcome. On one hand the county wants to build 28,000 new homes and on the other hand the existing residence want to maintain the quality of life they have paid for through their property taxes. The speculator who desires to have the agricultural zoning changed to accommodate the huge buildout is truly the only group who will benefit from this manipulation. The policies fail to adequately establish a compensation method for

H-2-23

communities who must sustain the burden of this land use speculation and the loss of the rural character.

H-2-23

In summary the proposed growth plan for WPAC will result in significant and cumulative impacts on the habitat and species present in this area. The policies and the growth plan fail to establish effective strategies to mitigate the impact. The overall land use changes are do not quantify the impact of the proposed new growth areas on the habitat and the species of concern. This plan requires extensive revision and significant field quantification before adoption.

Air Quality

The DEIR describes significant adverse impact on the air quality resulting from the proposed growth. No other factor or issue discussed in the DEIR will have more significance to the communities quality of life as the impact of the decreased ambient air quality. The polices ,as stated in the transportation/circulation policies, within the planning document promote the further degradation of ambient air quality. The policies fail to adequate establish performance standards based on air quality . The net result will be significant setbacks in the quality of life within our communities air basin.

H-2-24

The DEIR failed to describe the number of deaths that will result from the increased air pollution. The DEIR failed to quantify the emission factors related to the 60,000 new vehicles within the air basin. The DEIR failed to quantify and identify all air quality impacts resulting from the proposed new growth. The policies failed to establish performance standards to reduce the illnesses, injuries, and deaths resulting from the air pollution.

If the Board of Supervisors is to approve the General Plan Update, many policies and planning decisions would have to be amended or deleted; critical issues cannot be ignored. If such action could occur, however, it will require the preparation of a much expanded EIR. The most important aspect of the Draft General Plan Update is the assumed degradation of the wildlife habitat values within WPAC, which contains valuable wetlands, riparian vegetation and abundant vernal pool stands. We are requesting that the California Department of Fish and Game as well as the Federal Fish and Wildlife Service seriously consider this area for protection for its resident and migratory population potential. We are requesting a full reconsideration of the DEIR to evaluate the impact on this open space.

H-2-25

Conclusions

After reviewing the entire DEIR in relation to the our community, we regretfully believe that the County has abandoned this community to development interests without adequate review of the factors relating to the impact of their decisions. We believe that development can occur with less environmental damage elsewhere.

The DEIR is inadequate. It fails to describe the areas of significant and unavoidable impact in WPCA. It fails to address the specific CEQA requirements for impact assessment. The General Plan Update will have extreme land use conflicts as the proposed urban uses devastate the rural area and riparian/grassland/wetland habitat. We believe the acres of grassland, marshland and riparian and vernal pool areas within WPAC are of special significance and need protection under state and federal regulations as well as Placer county policies. It is unclear what public benefits could possibly justify the bad planning decisions and significant and unavoidable impacts to WPAC and our community as described in previous paragraphs. Hopefully these issues can be resolved.



Mark W. Pheatt
PO BOX 334
Elverta, California



Belinda Paine

H-3 Meadow Vista Municipal Advisory Council (11/08/93)

- H-3-1. *Draft EIR* Table 4-3 listing of widening of Placer Hills Road from I-80 to Combie Road should not assume funding if relying on Winchester improvements

The table to which this comment refers is derived from the Placer County Transportation Commission's 1993 Regional Transportation Plan. That plan identifies the cited roadway improvement as having "assured funding," but does not identify the precise source of this funding.

- H-3-2. *Draft EIR* should address decrease in desirability of housing in Auburn resulting from increased commute times because of congestion in I-80

While such an analysis might be interesting, it would necessarily involve speculation and subjective analysis that would be inappropriate in an EIR; particularly an EIR for a countywide general plan.

- H-3-3. *Draft EIR* Table 4-18 has incorrect information for Placer Hills Road; when information is corrected it should be placed in correct table

The traffic forecasts on Placer Hills Road in the Final EIR are based on population forecasts of the Meadow Vista and the Weimar/Applegate/Clipper Gap community plan areas.

- H-3-4. *Draft EIR* should address effects of development in Nevada County on Placer County roadways, specifically State Route 49

The traffic forecasts on State Route 49 at the Nevada County line represent the Sacramento Area Council of Government's 2010 traffic forecasts at that location and thus reflect their estimate of the impacts of Nevada County's growth.

- H-3-5. *Draft EIR* should discuss use of untreated water and groundwater provided by private wells in Meadow Vista area

The EIR's discussion of water service is sufficient for the Countywide General Plan. A more focused discussion, including use of untreated water and groundwater, should be included in the community plan for the area, if appropriate.

- H-3-6. *Draft EIR* should discuss Meadow Vista community interest in evaluating alternatives to septic systems

The specific discussion of alternatives to the existing on-site treatment systems in the area would more appropriately be addressed at the community plan level or through the facilities planning process.

- H-3-7. *Draft EIR* should acknowledge localized flooding problems in Meadow Vista Downtown Area

The DEIR included such acknowledgement.

- H-3-8. *Draft Plan* should recommend development of a countywide trails plan

The County feels that the approach to assembling a countywide trails plan through the ongoing community and specific planning process is appropriate and practical.

H-3-9 *Draft Plan* should rely on private donations of land and funds for parkland and/or historical properties

The County acknowledges that private donation of land for parks is possible, but does not feel it is appropriate to rely on such donations as a matter of public policy.

H-3-10. *Draft EIR* should refer to ARD Master Plan's assessment of current and future recreation needs

The EIR's parks and recreation analysis is intended to provide broad overview of the potential demand for park and recreation services generated by development under the Land Use Diagram. The more specific planning continues to be the appropriate domain of the service providers, including ARD.

H-3-11. *Draft EIR* should mention Meadow Vista as an area that will experience substantial development (i.e., Winchester)

The development estimates prepared for the EIR recognize the development potential of the Meadow Vista area, including Winchester.

H-3-12. *Draft EIR* should include a table listing or map indicating location of specific seismic and geologic hazards

The suggested map appears in the Background Report. The Background Report is a formal part of the EIR and the EIR text refers to the more detailed discussions of existing conditions in the Background Report. While this may be inconvenient in some cases, it is more efficient and more practical than repeating the background information within the EIR.

H-3-13. *Draft EIR* should include a table listing or map indicating location of high fire hazard areas

Refer to response to comment H-3-12.

G.P. EIR file

PLACER COUNTY
DATE
RECEIVED

NOV 09 1993

16103 Aurora Way
Meadow Vista, CA 95722
November 8, 1993

PLANNING DEPARTMENT

Mr. Fred Yeager, Director
Placer County Planning Department
11414 B Avenue - DeWitt Center
Auburn, CA 95603

RE: Meadow Vista MAC Comments on the Draft
Placer County General Plan Update

Dear Fred:

On behalf of the Meadow Vista Municipal Advisory Council (MAC) and the Meadow Vista Community Plan Steering Committee, we appreciate the opportunity to submit our comments to you on the draft Placer County General Plan Update.

In general, we are encouraged by recent newspaper reports that the Board of Supervisors has increased the review time for the Planning Commission and public to consider many of the complex planning issues addressed in the General Plan. Since the Plan will govern the county's growth and development over the next twenty years, we feel the extra review time is warranted and serves the best interests of all county residents.

While the draft document discusses a wide variety of planning issues, we have chosen to limit our comments to those issues applicable to the Meadow Vista-Clipper Gap Community Planning Area. It is our expectation that the Meadow Vista-Clipper Gap Community Plan, now being prepared by the Steering Committee and your department, will present a much more thorough discussion of community land use, transportation, and other planning issues than found in the General Plan.

With this as background, we have prepared the following comments on the Draft Policy Document and Draft Environmental Impact Report (EIR). Page numbers shown in () refer to the policy document while page numbers shown with a hyphen, such as 1-1, refer to the EIR.

Transportation and Circulation

1. Table 4-3 lists widening Placer Hills Road from I-80 to Combie Road as a \$4.4 million project. Projects are included in this list based on 'funds reasonably assured to come available through stable funding sources currently in place.' If this project is based on both Winchester improvements and establishment of a new Transportation Limitation Zone (TLZ), neither should be considered a stable funding source currently in place. See page 4-4.
2. Table 4-18 shows a dramatic decline in level of service (LOS) along I-80 between 1992 and 2010 (from B-E/F between Roseville and Auburn). Since many residents each of Auburn commute to jobs in southwest Placer County or Sacramento, the EIR needs to discuss the negative impact a significant worsening of commute conditions would have

H-3-1

H-3-2

on the desirability of housing when commutes lengthen to one hour or more. See page 4-22.

H-3-2

3. Table 4-18 also shows no increase in traffic on Placer Hills Road between 1992 and 2010 and a LOS of 'A'. Both the projection and current LOS are incorrect. The growth rate will be significantly higher than zero, and the LOS for 1992 was not A.

H-3-3

Once the traffic and LOS projections have been corrected, Placer Hills Road needs to be added to Table 4-24 showing roads with LOS D or worse in 2010.

Finally, there is no mention of the impact of projects in western Nevada County on Placer County roads. The EIR should discuss the impacts of Nevada County growth plans and designate State Route 49 as the only corridor for this development. If needed, Combie and Placer Hills Roads should be specifically excluded as a potential access corridor.

H-3-4

Public Facilities and Services

1. It would be helpful if the discussion about water service for the Meadow Vista planning area included mention of the use of untreated water and groundwater provided by private wells. See page 5-9.
2. The discussion of Meadow Vista wastewater collection and disposal for the downtown area should include the community's interest in evaluating septic system options. These options include a community leach field, a sewer connection to the Winchester development project, and construction of a small wastewater treatment plant. See page 5-32.
3. Due to heavy rains, the Meadow Vista downtown area, particularly along Placer Hills Road, will occasionally experience localized flooding and the formation of large pools of stormwater runoff. We would appreciate if the EIR would acknowledge these problems and indicate the County's intent to find a solution.

H-3-5

H-3-6

H-3-7

Recreational and Cultural Resources

1. The policy plan indicates that the county should prepare and periodically update a trails plan in conjunction with each community plan and/or specific plan. While we support this policy, we would recommend that a countywide trails plan be prepared to help coordinate hiking, biking, and equestrian trail development in the county. See page (82). Perhaps this should become an element of a County Park and Recreation Master Plan.
2. In discussing funding sources for the acquisition and development of parkland and/or historical properties, the county should also rely on the private donation of land and/or funds in addition to traditional public funding mechanisms. See page (79).
3. Meadow Vista relies on the Auburn Recreation and Park District (ARD) to provide and maintain public recreation programs and facilities. ARD has recently adopted a park and recreation master plan. The master plan adopts a standard of 5 acres of improved

H-3-8

H-3-9

H-3-10

Mr. Fred Yeager
November 8, 1993
Page Three

parkland and 5 acres of passive recreation area or open space per 1,000 population. It would be helpful for the draft EIR to refer to the ARD Master Plan and its assessment of current and future recreation needs. See page 7-3.

H-3-10

Natural Resources

1. Meadow Vista should be mentioned in the list of areas that will experience substantial development. For example, the recently approved Winchester project will have an impact on area natural resources. See page 8-3.

H-3-11

Health and Safety

1. Section 9.1 identifies various seismic and geologic hazards presented by development under the proposed General Plan. Absent information contained in the Draft Background Report, it is difficult to determine whether any of these hazards and their mitigations affect Meadow Vista. It would be helpful if the EIR contained a table listing or a map showing the location of specific hazards. See page 9-1.
2. Section 9.2 identifies Meadow Vista as a very high fire hazard area. Development under the General Plan would create substantial need for new or the improvement of existing fire protection services. As with the comment above, it would be helpful if the EIR contained a table listing or map showing the location of high fire hazard areas. See page 9-5.

H-3-12

H-3-13

Again thank you for the opportunity to submit comments on the Draft General Plan Update. Should you have any questions or wish additional information, please contact us at (916) 878-7388.

Sincerely,

Tom Denzler / BKP

Tom Denzler, Chairman
Meadow Vista MAC

Bryan K. Porter

Bryan Keith Porter, Chairman
Meadow Vista Community Plan
Steering Committee

H-4 Granite Bay Community Association (11/10/93)

- H-4-1. *Draft Plan* stream setback policies appear to conflict with Granite Bay Community Plan policies; what other policies do likewise? Will the Granite Bay Community Plan be modified?

The County does not intend to make any substantial changes to the Granite Bay Community Plan in conjunction with the Countywide General Plan. The County does, however, recognize that some changes may be necessary to bring the Community Plan into line with the General Plan.

- H-4-2. Existing zoning will accommodate projected growth so *Draft Plan* new growth areas are unnecessary

Comment noted; no response necessary.

- H-4-3. Development called for in *Draft Plan* would not provide primary wage earner jobs needed in Placer County

Comment noted; no response necessary.

- H-4-4. Reliance on new development to balance government budgets is fiscally unsound

Comment noted; no response necessary.

- H-4-5. *Draft Plan's* identification of new growth areas is growth-inducing and unjustified

Comment noted; no response necessary.

- H-4-6. General Plan should rely on infill development, directing urban growth to cities and rural growth to unincorporated areas

Comment noted; no response necessary.

- H-4-7. Summary list of concerns

This list of concerns does not provide enough information to respond to.

- H-4-8. General Plan should consider existing residents first; everyone does not have a right to live in Placer County

The General Plan includes policies and programs to protect current residents from the potentially adverse effects of future development. Furthermore, the County is disturbed by the commentor's assertion that not everyone has the "right" to live in Placer County; on the contrary, the United States Constitution provides that very right.

*revised 11-1-93
JEC*



GRANITE BAY COMMUNITY ASSOCIATION

P.O. BOX 2704 * GRANITE BAY, CALIFORNIA 95746 * (916) 791-7427

November 10, 1993

SANDRA HARRIS
Issues Coordinator

Mr. Loren Clark
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RE: Placer County General Plan

Dear Loren:

Thank you for the opportunity to respond to the Placer County General Plan Update. The Granite Bay Community Association would like the records to show that we believe the documents are confusing and full of conflicting information which makes it difficult to come to the logical conclusion that the plan has addressed the concerns most residents have about the impacts of designating new growth areas in agriculture land.

Public Works has stated that if the new town concept is adopted, existing general plans will have to be revisited to look at road systems. The plan also recommends that all stream setbacks in the county be 50 feet. This would be a change to the Granite Bay Community Plan which was developed and supported by Granite Bay residents. What other goals and policies in existing community plans will be changed? The Placer County General Plan was not to tinker with existing general plans.

H-4-1

The designation of new population centers in agriculture land when the current general plan has enough zoning to accommodate growth for 45/60 years is premature and will be a degradation to the environment, create traffic congestion, lower the air quality, and do away with open spaces. Businesses which might have located in Placer County will be driven away and the economic climate of the County will suffer.

The population of Placer County is approximately 172,000 with the projected population to be 312,000 by 2010. The communities of Roseville, Rocklin, Lincoln, and Granite Bay have general plans in place that will accommodate approximately 186,000 additional residents and there is no pressing need to designate new growth areas at this time. Allowing new population centers in the southern portion of Placer County will have severe impacts to the infrastructure, fiscal stability, and general plans of these communities. The proposed plan uses an artificial 40 year projection of need to indicate the need for increased residential zoning by 2010.

H-4-2

Residential development and low paying retail and service type jobs endangers an area's long term economic health and places an increased demand on all infrastructure. Creating new population centers in the agriculture land is growth inducing and leap frog development. The leading business in the County should not be the construction/housing industry which does not pay its way, but non-development industries which have the ability to provide primary jobs for long term economic survival.

H-4-3

The creation of jobs is the first argument development interests use for building homes. Despite its rapid growth this region has not provided enough jobs and in fact may have promoted negative employment. Placer County's growth comes from migration and the jobs situation has deteriorated under the rapid growth scenario. The construction jobs and secondary retail opportunities do not provide the important primary jobs and continued growth in Placer County of the wrong type will create fewer jobs and make it even more difficult for existing residents to find primary employment.

H-4-3

Relying on new development to balance government budgets is fiscally unsound and part of a vicious deficit cycle. When the construction industry went into recession, governments depending on construction activities began having deficits because there was no new development to cover the underlying shortfall of prior projects which meant services had to be cut. If new growth pays for itself, then government should not have fiscal reverses when construction goes into a recession. There is a limited amount of land that can be developed and when the population doubles the deficits that roof top development creates will become even more critical.

H-4-4

Depending on the housing industry is growth inducing and has many environmental impacts. Resources such as land and water are depleted, traffic becomes impossible, air quality is degraded, more affordable housing is needed, social services are increased, crime increases, schools are impacted, recreation facilities are impacted, existing businesses are affected, agriculture is lost, primary employers shun the area, government budgets operate in the red, government fees are raised, the quality of life decreases and taxpayers are required to subsidize development.

The existing residents have and should expect that their rights be protected and promoted. Designating new population centers is an artificial growth stimulus which allows development to design the general plan rather than the plan designing development. Placer County has attracted many major land developers from other counties due to its rapid population growth and these developers have actively participated in local politics.

H-4-5

It appears that three supervisors are directing staff's actions and the EIR has been written to justify a political decision. There is little or no support for the new population centers and the documents are replete with external conflicts. What criteria was used to determine the new population centers? How were they selected? How substantiated?

Most of these concerns were passed on to the Board of Supervisors early in the process by residents and city representatives, but the Board of Supervisors has continued to pursue their initial decision of designating new population centers in agriculture areas and the EIR is being used to justify that direction from the Board of Supervisors.

Infill development is a viable option which would take pressure off agriculture areas. By considering exiting residents and their needs, growth would be held to a reasonable pace and Placer County would have a breathing space to catch up on the infrastructure needed to accommodate the rapid growth that has occurred here in the past 10 years. Urban growth should be directed to the cities and rural growth to be unincorporated areas.

H-4-6

IN SUMMARY, GBCA'S CONCERNS ARE:

•Leapfrog development

H-4-7

- Zoning new areas for development when the general plan already has adequate areas designated for growth to last for 45/60 years
- Impacts to existing communities including roads, schools, sewer, water, electric, air quality, parks, recreation areas, libraries, etc.
- Impacts to Rocklin, Lincoln, Roseville, and Granite Bay which already have general plans allowing for approximately 186,000 new residents
- The growth inducing impacts of adding 35,000 dwelling units to accommodate more than 100,000 residents
- Traffic impacts to Granite Bay on Douglas, Eureka, Auburn/Folsom, Sierra College, and Roseville Parkway
- Impacts to the quality of life of residents living along these roads
- Funding for new roads and other infrastructure
- Changes to the Granite Bay Community Plan triggered by developing new growth areas
- Impacts the new towns would have on existing school districts
- Availability of water in a drought year and whether there is enough to sustain the quality of life of existing residents
- Impacts to existing recreation areas
- The inconsistency of preserving the industrial area of Sunset while at the same time expanding housing in the area
- The inconsistency of preserving agriculture areas while at the same time promoting agriculture land as new growth areas
- Inability to preserve and protect agriculture due to the conflicts in the plan
- Inadequate buffer zones between agriculture and proposed development
- Use of roads as buffer zones
- The inconsistency of building near the landfill
- Not enough information addressing the impacts of all the new towns is provided in the documents
- Lack of public support for designating new growth areas in agriculture land
- Lack of reasonable alternatives which are environmentally superior

H-4-7

GBCA
Page 4

The Placer County General Plan should encourage development that doesn't promote unmanaged growth but rather requires quality community development for long term economic survival. Existing residents in Placer County should be considered first and the protection of their quality of life should have primary consideration. Everyone does not have the right to live in Placer County and the County does not have an obligation to provide this opportunity. H-4-8

Thank you for your time.

Very truly yours,



Sandra H. Harris, Secretary

H-5 North Auburn Municipal Advisory Council (11/10/93)

H-5-1. *Draft EIR is an incomplete document*

Comment noted; no response necessary.

H-5-2. *Draft EIR lacks adequate no project alternative*

Chapter 10 of the Final EIR describes the no project alternative.

H-5-3. *Draft EIR fails to adequately explain why impacts are unmitigable*

Refer to common response #2.

H-5-4. *Draft EIR is a selling document pushing new urban development in new growth areas*

Comment noted; no response necessary.

H-5-5. *Draft EIR basically ignores part of county outside new growth areas*

The Draft EIR addresses the entire county.

H-5-6. *Draft EIR ignores objectives and plans of cities in county*

The Draft General Plan and Draft EIR are Placer County's. They are not intended to address the objectives of the individual and autonomous cities in Placer County. The Draft and Final EIRs do anticipate continued growth in the cities consistent with their respective general plans.

H-5-7. *Fast track general plan process weakens public involvement*

The 45-day review period for the Draft EIR provided by the County complies with the requirements of State law. The Board of Supervisors and Planning Commission extended by several months the public comment period on the Draft General Plan. The description of the General Plan preparation process in Chapter 1 of the FEIR describes the Board and Commission hearings.

H-5-8. *Draft EIR shows Route 102 despite County opposition*

The referenced figure should not have shown the proposed Route 102 alignment; the Final EIR corrects this problem.

H-5-9. *Draft EIR triggers cancellation of Williamson Act contracts*

The County does not promote the cancellation of Williamson Act contracts.

H-5-10. *The Draft EIR is a weak, inadequate instrument for decision-making*

Comment noted; no response necessary

H-5-11. *Draft Plan* and *Draft EIR* should provide a clear, easily understood guide for development

The County feels that the Policy Document and EIR are easily-understood and will be effective guides.

H-5-12. *Draft Plan* and *Draft EIR* should eliminate preselection of new growth areas

Comment noted; no response necessary.

H-5-13. *Draft Plan* and *Draft EIR* should clearly show criteria for new development

Comment noted; no response necessary.

H-5-14. *Draft Plan* and *Draft EIR* should clearly show planning objectives for the current time period

Comment noted; no response necessary.

H-5-15. General Plan Update process and schedule should invite and promote public input and documents should be made available to taxpayers free of charge

Refer to response to comment H-5-7. The County is not in a financial position to subsidize document reproduction costs, even for taxpayers.

FYV, LC



COUNTY OF PLACER NORTH AUBURN MUNICIPAL ADVISORY COUNCIL

P.O. Box 6983 • Auburn, California 95604

November 10, 1993

Larry Sevison
Placer County Planning Commission
Post Office 108
Tahoe Vista, CA 96148

PLACER COUNTY
DATE RECEIVED

NOV 12 1993

PLANNING DEPARTMENT

RE: Placer County Draft General Plan

Dear Mr. Sevison,

This Council (NAMAC) met on November 1, 1993 to promote a discussion and develop comments on the Placer County Draft General Plan and draft Environmental Report.

Based on comments from the audience and the Council with an unanimous vote, the NAMAC finds:

DRAFT EIR:

- is an incomplete document;
lacks an adequate "no project" alternative;
fails to adequately explain why impacts are "unmitigable";
is a selling document pushing new urban development in four specific areas;
basically omits that portion of Placer County outside of the four designated areas;
ignores the various objectives and plans of incorporated cities within the County;
the "fast track" process seriously weakens opportunity for, and the effect of, public input;

H-5-1
H-5-2
H-5-3
H-5-4
H-5-5
H-5-6
H-5-7

- proposes to "by-pass" present County policies, e.g. 1) shows State Route 102 on the "new urban" areas illustration (County is opposed to State Route 102); and 2) triggers cancellation of Williamson Act lands (an act designed to conserve farmland); and
- as a document for decision makers to use, it is a weak, inadequate instrument.

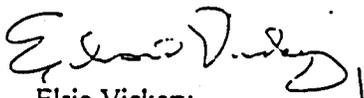
H-5-8
 H-5-9
 H-5-10

And, the NAMAC recommends the draft Placer County Plan and draft EIR be restructured:

- to provide a clear, easily understood guideline for future County development over the next 20 years;
- to eliminate pre-selecting new urban areas;
- to clearly show criteria for "new" development; (Note: on both of the above, the existing draft "new urban" guidelines could be revised as new development in general guidelines.) Such criteria would include directing new growth to within a city's sphere of influence, using existing infrastructure, all major new development is to pay its associated costs;
- to clearly show the planning objectives for the current time period. This would inform Placer County decision makers and the public what is being planned; and
- to adopt a schedule and process which invites and promotes public input. Documents are to be made available at no cost to taxpayers.

H-5-11
 H-5-12
 H-5-13
 H-5-14
 H-5-15

Respectfully submitted,



Elsie Vickery
 Chairman

EV:jr

- cc: Ron Lichau, Supervisor
 Rex Bloomfield, Supervisor
 John Marin, Administrative Assistant
 ✓ Fred Yeager, Planning Department Director
 Auburn Journal
 Auburn Sentinel

H-6 Pleasant Grove Flood Control Committee (11/15/93)

- H-6-1. Development under *Draft Plan* will affect roadways in Sutter County, particularly Riego Road and Highway 99/70

The Draft EIR assumes that the future Placer County road network will connect with roadways described in Sutter County planning documents. While neither the EIR nor the Policy Document suggest the development of a roadway the magnitude of the proposed Route 102, the EIR does indicate the need for some major east-west roadways by the year 2040.

- H-6-2. Increases in traffic on I-80 will cause increases in traffic on surface streets in Sutter County and therefore increases in harmful pollution

The EIR recognizes that development in Placer County will contribute to cumulative regional air quality problems.

- H-6-3. Commentors suggest recapture of surface water run-off for water supplies and also groundwater recharging systems

The Policy Document includes policies and programs addressing water resources, including water quality and surface runoff.

- H-6-4. Commentors have several objections to Roseville Regional Wastewater Treatment Service Area Master Plan EIR

Comments noted; no response necessary.

- H-6-5. *Draft EIR* Table 5-6 does not specify if flows cited are dry weather or wet weather

The Final EIR specifies that they are dry weather flows.

- H-6-6. Commentors encourage reuse of treated effluent wastewater

The Policy Document includes policies encouraging reuse of treated water.

- H-6-7. EIR should cite need for mitigation measures

Refer to common response #2.

- H-6-8. SAFCA studies indicate major drainage problems, so commentors object to development in Dry Creek, Natomas Cross Canal, and Cross Creek Canal watersheds

Comment noted; no response necessary.

- H-6-9 *Draft Plan* and *Draft EIR* should address drainage at both local and watershed-wide levels

Section 4, Public Facilities and Services, of the Policy Document includes policies addressing both local storage (under Stormwater Drainage) and systemwide storage (under Flooding).

- H-6-10. Policy should promote unified design of retention or detention storage systems, rather than allowing a haphazard system to develop

The General Plan Policy Document includes a program (4.11) calling for whatever studies are necessary to implement drainage improvements.

- H-6-11. EIR should address cumulative impact of drainage improvements

Comment noted; no response necessary.

- H-6-12. General Plan policies should address erosion problems, particularly as they affect downstream properties

Comment noted; no response necessary.

- H-6-13. Commentors recommend that Placer County cooperate by providing periodic updates on flows and figures to use as early warning devices

The Policy Document includes policies promoting cooperation and communication with other public agencies at all levels of government, including adjacent counties.

- H-6-14. Commentors recommend that Placer County coordinate with its cities in addressing flooding problems, including forming a joint powers agreement

The Policy Document includes policies calling for the County to coordinate its flood control planning efforts with other local, state, and federal agencies.

- H-6-15. Commentors encourage joint use of parks as habitat areas and as retention and detention basins

The General Plan Policy Document includes policies calling for the type of joint uses suggested.

- H-6-16. Commentors recommend that County join with cities to address improvements required with NPDES permits

The Countywide General Plan is not the appropriate vehicle for addressing the level of information required for the filing of NPDES permits.

- H-6-17. Agricultural land is good for taking excess water during winter months, so County should preserve such land

The Draft General Plan includes strong policies supporting the protection of agriculturally-designated land and recognizes the value of open space areas in the development of water resources.

- H-6-18. County should enforce strict policies requiring a 1601 permit process

The Policy Document includes policies and programs to protect streams. It is the responsibility of the California Department of Fish and Game (DFG) to enforce the provisions of the California Fish and Game Code, include Sections 1601 and 1603 regarding streambed alteration agreements.

H-6-19. General Plan should include an adequate and realistic transportation system plan to minimize air quality impacts

The Draft General Plan provides opportunities for balanced development that would not require Placer County residents to commute long distances, as many now have to.

H-6-20. General Plan will have growth-inducing impacts that will affect Pleasant Grove and Sutter County

As described in the EIR, the Countywide General Plan is intended to shape the form of future development in Placer County. The Plan is intended to accommodate growth, not to limit it.

H-6-21. General Plan will have serious impacts on creeks and tributaries, riparian wetlands, vernal pools, and plant and aquatic life

The EIR documents the potential environmental effects of development under the plan, including impacts on the areas the commentor mentions.

H-6-22. General Plan will have severe cumulative impacts related to flooding

The EIR does not conclude that Plan will have severe cumulative impacts on flooding.

H-6-23. Commentors recommend that Placer County join them, Sutter County, SAFCA, and Reclamation Districts 1000 and 1001 to find solutions to regional flooding problems

The Policy Document includes policies calling for the County to coordinate its flood control planning efforts with other local, state, and federal agencies. Accordingly, the County is available to participate in such regional flood control planning efforts.

Pleasant Grove Flood Control Committee

P.O. Box 721, Pleasant Grove CA 95668
Phone: (916) 655-3593 Fax: 655-3595

November 15, 1993

Loren Clark, Senior Planner
Placer County Planning Department
11414 B Avenue
Auburn, CA 95603

RE: PLACER COUNTY GENERAL PLAN UPDATE

Dear Mr. Clark:

The Pleasant Grove Flood Control Committee wishes to express several concerns regarding the Placer County General Plan Update Draft Environmental Impact Report published October 1, 1993.

The areas we will be addressing are those that are in the watersheds of Coon Creek, Auburn Ravine, Markham Ravine, Pleasant Grove Creek, and Curry Creek, and all other tributaries that enter the East Side Drain, the Pleasant Grove Cross Canal, which thereby enter the Natomas Cross Canal to the Sacramento River. Specific developments mentioned within the Draft EIR are the New Growth Areas of Bickford Ranch, Placer Villages, Stanford Ranch West, and Villages of Dry Creek, as well as the South Placer Cities of Lincoln, Rocklin, and Roseville.

The exception may be the Villages of Dry Creek because the drainage appears to be within the Dry Creek Watershed, which flows into the Natomas East Main Drain. However, for the same reasons, Sacramento County should be concerned as well as residents of Rio Linda that this development will have similar impacts on that region.

Transportation and Circulation

Sutter County transportation records indicate that Baseline Road entering Sutter County is around 10,000 cars today. It appears that the estimates on this major artery have already increased since 1990 by 250% in 3 years. Is it possible that the numbers used are very conservative, and should be re-examined. Consider where Baseline Road enters Sutter County and becomes Riego Road. Riego Road is used as a local thoroughfare for people living in Sutter County including farm equipment. Due to current development the increase in traffic on Riego Road has already caused numerous rearrangements in stop signs for safety. In addition, there are

H-6-1

serious safety risks associated with the larger volume of cars trying to enter Highway 99/70 going southbound where traffic must cross over two lanes of 99/70 without benefit of a stop light or overpass. As development has increased in Placer County and the Foothills, more motorists are taking shortcuts on local surface streets. There was no mention of the proposed Interstate Route 102 in the Report. Are your planners are considering routing another 100,000 or more commuters on surface streets? Your report shows that I-80 is already at gridlock, and will likely stay that way.

H-6-1

Air Quality - As I-80 traffic increases more, so will traffic on our surface streets causing an increase in harmful pollution in Sutter County and Pleasant Grove.

H-6-2

Infrastructure Chapter 5

Water Demand Projection

Table 5-1 shows a tremendous need for future water supplies. We suggest that the recapture of surface water run-off for storage. With new and stricter Water Quality standards, there will be requirements to treat this run-off. There are also options of groundwater recharging systems.

H-6-3

Regional Wastewater Treatment

We have responded to Greg Giannonatti, Placer County Environmental Utilities regarding the Roseville Regional Wastewater Treatment Service Area Master Plan EIR. The impacts on Pleasant Grove Creek are tremendous. Our objections include: increased flood risks, pollutants, impacts on vegetation, effects on fisheries, summer flows mixing with irrigation water supplied downstream, use of treated water, monitoring and reporting of water quality testing, destruction of oaks, riparian beauty/habitat, defined data on releases/daily/monthly and more. Table 5-6 does not define if these are wet or dry weather flows. Please clarify.

H-6-4

We also encourage the re-use of treated affluent wastewater and recommend your planners require the large industrial users of water find uses for the affluent discharges. There are many cities designing buildings to use this water. Use of wastewater for golf course irrigation would not be a benefit for lower releases into the watersheds during the winter months.

H-6-5

H-6-6

The policy must include wording that affluent discharge will not effect flooding downstream during wet days.

H-6-7

There will be a need for mitigation measures.

5.3 Drainage

The Sacramento Area Flood Control Agency has hired two engineers to prepare Flood Control studies on our watersheds. Joe Countryman is

H-6-8

working on the Dry Creek/Rio Linda/Elverta area, and is working with Jim Schauf on the area of Pleasant Grove and the Cross Creek Canal. These studies are due to be completed in February, 1994 with Alternatives for solutions. Some of your planners may have already received some of the new data. Mr. Schauf has many concerns. The biggest concern is that the Natomas Cross Canal is running at capacity even during the more frequent storms. Because this is the destination point of drainage from Placer County north of Dry Creek, it is a major problem. The increase in any additional velocities as well as volume can cause serious flooding downstream. We must object to any development within these watersheds.

H-6-8

We must look at the entire watershed as well as the individual watersheds. As projects are applied for and reviewed there must be two policies, one addressing the local drainage, the other the entire system. These policies must include storage. In any flood control system, storage is the main ingredient.

H-6-9

The management of policies will become impossible if policy is to allow each development to design their own retention or detention storage systems. Mitigation measures will surely become more expensive if policies allow a haphazard hazard system to develop.

H-6-10

Altering or enlarging bridges and culverts and improving channel capacities may improve some areas, however not without impacting another area. The sizing and shape of culverts can alter run-off velocities. Using a 10'x10' concrete box culvert will not slow flows that would never fill the box. Any and all improvements for drainage will impact those downstream. The cumulative impacts must be addressed with something as simple as a culvert size and shape.

H-6-11

Erosion must always be considered when earth is moved. There will continue to be erosion problems further impacting properties downstream. Continual maintenance with district fees should be in place.

H-6-12

Cross Canal Watersheds 5-45

As data is compiled in the current Pleasant Grove Flood Control Study, we will have more data, that may further define the figures for storage. It is a very complicated system of creeks and tributaries, some of which spill and spread over several thousand acres almost annually. This General Plan with its growth potential will impact the Cross Canal as well as the Sacramento River and American River.

H-6-13

We also would like a plan for early warning devices in the watersheds on creeks that have and could become dangerous. We are installing measuring devices in our creeks now to keep records of flows. We would encourage your Flood Control Agency to do the same. Periodic updates on flows and figures must be considered and the policies to address new findings.

As the impacts on development occur in the incorporated areas, there will also be the incorporated cities contributing to impacts as well. We would encourage your County Flood Control Agency to begin coordinating with your cities a plan of action for this region, including a joint powers agreement similar to SAFCA. The state as left us the job of dealing with our flooding problems regionally. If your county is to continue to grow and prosper, it must be responsible for its impacts.

H-6-14

Recreational and Cultural Resources

The General Plan will be defining open space designations. We would encourage the joining of land for parks as areas to preserve and restore habitat as well as acreage used for retention or detention basins. Storm water management is feasible in summer month recreation areas.

H-6-15

Natural Resources

Before Placer County is required to file a National Pollutant Discharge Permit with the State Water Resources Control Board it should consider within this General Plan those improvements that will be required by law. There should be additional planning for these systems.

H-6-16

Surface Water Quality will continue to deteriorate in the watersheds as more development occurs. Again, the requirements of a NPDES permit will require improvements. The cumulative effects could be addressed with the cooperation of the cities with the county in a solution together. It may be more efficient for the County to bring the cities into an agreement.

Agricultural Resources

Agriculture in the development area is good for taking some excess water during the winter months. We encourage the preservation of land that can hold run-off and recharge aquifers, as well as slowly percolating rain water.

H-6-17

Land leveling practices can no longer fill in flood plains, as well as alter stream beds, route water along roads, change channel capacities, and more. Strict policies should be in force requiring a 1601 permit process. The past mistakes of these practices has had an impact in the watersheds, and remedies in some areas may be needed.

H-6-18

Air Quality

Air Quality should be another major concern of Placer County officials. The development in the foothills encourages commuters to live farther and farther from their jobs. As more automobiles use the surface streets in Sutter County, our residents will be breathing the Carbon Monoxide. Your county is responsible for a large increase in commuters traveling great distances to reach

H-6-19

their homes. An adequate and realistic transportation system must be developed.

H-6-19

This General Plan Update has growth inducing impacts that will effect Pleasant Grove as a neighboring community as well as Sutter County.

H-6-20

This Plan will also have several serious environmental impacts on creeks and tributaries, as well as riparian wetlands, vernal pools, and plant and aquatic life.

H-6-21

This Plan will also have severe cumulative impacts relating to flooding problems.

H-6-22

We recommend Placer County as well as its cities join with us, Sutter County, SAFCA and Reclamation Districts 1000 and 1001 to find a regional solution for the flooding problems. Our committee hopes that we can bring all of the agencies together to work on solutions that will work for all of us.

H-6-23

We ask the Board of Supervisors to be sure that the policies adopted and the issues that are addressed here are clearly understood by all parties effected. Our committee must be notified of any changes are made in what the policies are or will be in the future.

We are thankful for this opportunity to express our concerns and objections. We encourage further dialog, as well as new ides and solutions to a very serious problem.

Sincerely,

Bobbi Coggins
Bobbi Coggins
Chairman

Carleen Sills
Carleen Sills
Vice Chairman

Lelapa Linn
Lelapa Linn
Secretary

cs/pcgpucla

H-7 SORE (Save Our Rocklin Environment) (11/15/93)

H-7-1. *Draft Plan and Draft EIR are inadequate and incomplete and do not provide information necessary to consider alternatives and mitigation measures*

Comments noted; no response necessary.

H-7-2. *Draft Plan and Draft EIR do not reference any air quality plans that comply with Federal and State laws*

The EIR acknowledges that development under the Draft General Plan will contribute to regional air quality problems.

H-7-3. *Draft EIR air quality analysis methodology is inadequate*

The County disagrees with this comment.

H-7-4. *Draft EIR does not document local and regional hot spot air quality problems*

The EIR addresses air quality impacts at a level of detail appropriate for a countywide general plan.

H-7-5. *Draft EIR regional air quality analysis is incomplete and inaccurate because its assumptions are inconsistent with other plans*

The EIR acknowledges that the growth assumptions associated with the General Plan differ from those prepared for local air quality plans; the Policy Document, however, includes policy and program commitments that address the differences.

H-7-6. *Draft EIR does not document regional air pollution analysis in the same way Rocklin's General Plan does.*

The DEIR's air quality analysis considers this type of information, but the County did not feel it necessary to document it in the level of detail requested.

H-7-7. *Draft EIR does not list sanctions that will result from not implementing effective implementation measures and analyze their impacts*

The Draft General Plan includes several policies and programs that will contribute to lessening of air quality problems.

SORE Save Our Rocklin Environment

Craig Wood
6050 Stone Hill Dr.
Rocklin, CA 95677
(916) 624 - 3709
11/15/93

PLANNING DEPARTMENT
Placer County Supervisors and Planning Commission
Placer County Planning Department
11414 "B" Avenue
Auburn, CA 95603

Subject: Placer County General Plan Update October 1, 1993 Documents -- Air Quality

Placer County Supervisors and Planning Commission:

The Placer County General Plan Update October 1, 1993 Documents including but not limited to the Draft Policy and Draft EIR are inadequate and incomplete. Neither the decision makers nor the public can adequately evaluate the full accumulative harm that this project will produce due to incomplete information and the lack of adequate alternatives for preventing air quality deterioration while providing for the transportation needs of the surrounding area. The EIR does not fully and correctly provide the necessary information base for reasonable alternatives and mitigations to be evaluated.

H-7-1

The project site is in an air basin region that has been legally noticed as a non-attainment area for air quality. Both Federal and California State laws and regulations need to be fully addressed in this EIR and complied with. The 1991 Air Quality Plan does not project an attainment date. There is no referenced air quality plan in these Placer County General Plan Documents which complies with Federal and State laws. Without a full impact analysis, a plan and adequate mitigations this general plan and its EIR is not legally adequate.

H-7-2

The referenced DKS traffic air quality methodology is inadequate. Land use, vehicle miles traveled for speed ranges by emission rates have not been proven to project accurate air quality information. Number of trips per housing unit is increasing due to but not limited to elimination of school busing and closer shopping centers which promotes more trips. LOS for traffic flow, number of stop lights also need to be documented as part of projected air quality information. The air quality methodology has not been fully disclosed so that the decision makers and the public can fully review/audit the calculations. The conclusions are incomplete and not supported by adequate documentation.

H-7-3

The recent consultant work for the North Rocklin Traffic Study by DKS in 1993 clearly shows that there is a traffic flow problem in the South East area of Rocklin that will produce an "F" LOS with the fully considered alternatives. Rocklin was advised in an October 16, 1989 Memorandum from Noel A. Sonderson, Air Pollution Control Officer for Placer County, that in Rocklin "The predicted carbon monoxide (CO) levels appear low, especially considering the predicted "Level of Service" at local intersections". The memo noted the NOx and ROG problem being produced by Rocklin when ozone standards are being exceeded and that Rocklin's ride sharing ordinance was not verifiable. Local and regional hot spot air quality problems are not documented.

H-7-4

The regional analysis information is incomplete and inaccurate. For example the DKS North Rocklin Traffic Study of 1993 does not include the extension of Rocklin Road, the 1993 DKS Placer County study apparently includes the extension. The 1988 Placer County Regional Transportation Plan, page 36, specifies that Rocklin Road needs to be six lanes within the short term five year planning period. The 1993 Rocklin General Plan has most of Rocklin Road as four lanes with five lanes at the I-80 underpass. This lack of planning consistency and completeness of the regional information is producing an inadequate plan and EIR. A traffic problem in one part of the county can cause traffic to back up into other parts of the county which is not documented.

H-7-5

The May 1990 Technical Appendices for the Annotated Draft Environmental Impact Report for North Central Roseville Specific Plan, included Table IV-4 on Intersection Level of Service Definitions. This table included the "Stopped Delay" times for various LOS. The 15 to 25 seconds wait times at LOS "C", is being increased to 25 - 40 seconds at a "D" LOS, a 66% increase. In the September 1990 in Rocklin General Plan on page 73, Policy 13, Rocklin changed its General Plan to allow "D" LOS in parts of the City of Rocklin, which includes Rocklin Road. The 1993 DKS study indicates that upon build out an "F" LOS will be produced without major improvements, the 60 + seconds LOS increase time is a 400% increase in potential pollutants from vehicles in the effected area. Documentation of these types of regional pollutants increases is not included in this EIR.

H-7-6

Placer County will not be complying with the Air Quality laws and the health and safety laws including, but not limited to HS 40910, 40911 and 40914. With high growth rates, such as Rocklin's rate in excess of 150% documented in the most recent US census, by increasing traffic congestion and by not implementing effective mitigation measures, violations of law are likely to produce sanctions. This EIR does not provide a list of suggested sanctions and a analyze of their impacts. Placer County is contributing to the harm of timber and forests on public and US lands in the Sierra Nevada Mountains with its air pollutants. Placer County is thus not complying with the Public Trust Doctrine.

H-7-7

For Placer County to approve the present General Plan Update's EIR based upon the information provided would jeopardize the health and welfare of the people they represent.

Sincerely,
Craig Wood
Craig Wood,
SORE Litigations Chairperson

H. Oral Comments

I-1 OCTOBER 14, 1993

I-1-1: Jim Bush, Placer County Office of Education: The *EIR* should include a section addressing school impacts.

See common response #7.

I-1-2: Leigh Coop, Center Unified School District: The *EIR* should include a section addressing school impacts.

See common response #7.

I-1-3: Patty Dunn, Planning Director, City of Roseville: The *EIR* does not include adequate mitigation relating to infrastructure and traffic impact in Roseville. Comments also submitted in letter form.

See comment letter A-3.

I-2 OCTOBER 28, 1993

I-2-1: Jim Ricker: Various comments also submitted in letter form.

See comment letter G-2.

I-2-2: Mary Ann O'Keefe Stinson, President, Placer County Coalition of Community Associations:
Various comments also submitted in letter form.

See comment letter H-1.

I-2-3: Nick Alexander, Placer Villages: Various comments also submitted in letter form.

See comment letter F-6.

I-3 OCTOBER 29, 1993

No *Draft EIR* comments received.

I-4 NOVEMBER 11, 1993

I-4-1: Sandy Harris, Granite Bay Community Association: Various comments also submitted in letter form.

See comment letter H-4.

I-4-2: Sharon Cavallo, Chair, Rural Auburn Preservation Society: Various comments also submitted in letter form.

See comment letter E-4.

I-4-3: Linda Emerson, Robbins & Livingston (on behalf of Villages of Blue Oaks): Various comments also submitted in letter form.

See comment letter F-3.

I-4-4: Dave Spannagel: The level of service criterion for determining impacts on rural roadways (LOS B) should be reduced.

The impact criterion in the EIR is based on the Policy Document's LOS standards. The standard to which the commentor refers has been changed to LOS C (from LOS B in the Draft Policy Document).

I-5 NOVEMBER 18, 1993

I-5-1: Terry Davis, Sierra Club: Various comments also submitted in letter form.

See comment letter E-2.

I-5-2: Janice Palmer: Various comments also submitted in letter form.

See comment letter G-3.