

LETTER 58 KRIS STEWARD, LAW OFFICES OF GEORGE E. PHILLIPS

Response 58A: The commenter represents the proposed Creek View Specific Plan developers and provides an exhibit showing the location of the project northwest of Roseville along Pleasant Grove Creek. The comment is acknowledged.

Response 58B: The commenter asks whether the alignment of the alternative off-site water pipeline is inside or outside the boundaries of the proposed Creekview Specific Plan and wishes to know its relationship to the Placer Parkway alignments. Commenter also requests that the EIR be modified to show the alignment in relation to the Creekview Specific Plan land use plan and identify biological resource impacts, if the alignment is within the Creekview Specific Plan area.

The proposed water pipeline is currently shown passing to the west and to the north of the proposed Creekview Specific Plan area. The alignment is consistent with an extended alignment of Watt Avenue and transitions to an easterly alignment north of the Creekview Specific Plan, consistent with a potential future alignment of Placer Parkway or the extension of projected roadways in Placer Ranch (University Boulevard or Placer Ranch Road). The alignment at this stage is conceptual and subject to change. A programmatic “Biological Resource Impacts” analysis of the conceptual pipeline alignment is contained on pages 6.3-6 and 6.3-7 of the Second Partially Recirculated Revised Draft EIR

Letter 59

William D. Kopper

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May 14, 2007

VIA FACSIMILE ONLY (530) 745-3003

Ms. Maywan Krach
CDRA Assistant Technician
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive
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RE: Second Partially Recirculated Revised Draft Environmental Impact Report for Placer Vineyards Specific Plan (SCH# 1999062020)

Dear Planning Staff:

These comments on the Second Partially Recirculated Revised Draft Environmental Impact Report are submitted on behalf of Rob Collins, Mark Steelman, and Michael Williams. These comments include the attached letter from Mr. Daniel Smith, Traffic Engineer.

On page 4.13-15 of the Second Partially Recirculated DEIR, the DEIR states: "The Placer Vineyards project is considered to potentially make a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change." Further, on page 4.13-17 the EIR states as follows:

Even with implementation of the above described measures, however, the Placer Vineyards project will likely result in a substantial amount of GHG (Greenhouse Gas) emissions. Because it cannot be determined to a reasonable degree of certainty that the Placer Vineyards project will not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change, the impacts of the proposed project on global climate change are considered significant and unavoidable.

The Project EIR predicts that the Placer Vineyards Project would generate 523,000 tons of CO₂ emissions per year. Further, the EIR states that California is the twelfth to sixteenth largest emitter of CO₂ in the world and produced 492 million gross metric tons of carbon dioxide equivalents in the year 2004. It is set forth in the EIR that the increase in CO₂ emissions will have wide spread adverse environmental impacts including earlier spring snow melts, reduced water supplies, increased fires, exacerbated air quality problems, and a rise in sea levels.

A

Ms. Maywan Krach
 CDRA Assistant Technician
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The Legislature has declared a policy that CEQA requires feasible mitigation measures to be adopted whenever they would substantially lessen the significant environmental effects of the project. (Public Resources Code §21002.) The Legislature requires that when a project will have a significant environmental effect which cannot be mitigated below a level of significance, then the responsible agency must find that specific overriding economic, legal, social, technological or other benefits of the project outweigh the significant environmental effects which cannot be mitigated below a level of significance, before approving a project. (Public Resources Code §21801(b).) Nothing in CEQA would support the view that a statement of overriding considerations would relieve a public agency of the duty to adopt feasible mitigation measures which would substantially lessen the significant environmental effects of a project simply because those measures would not reduce the impact below a level of significance.

A cont.

It is clearly the law in California that an agency must adopt all feasible mitigation measures even if they will not mitigate the environmental impact below a level of significance. With respect to mitigating the impact of the Project on global climate change, the EIR sets forth mitigation measures 4.13-1a through 4.13-1p. These measures have limited, if any impact, and there are many other feasible mitigation measures that can reduce CO₂ emissions.

One of the mitigation measures suggested is encouraging residential homeowners to plant deciduous trees on the south and west side of homes. This measure is only advisory. The County can require much more with respect to tree plantings to reduce CO₂ emissions. As set forth in the attached article incorporated herein by reference, Dr. Greg McPherson of the USDA Forest Service Center for Urban Forest Research states, asphalt concrete and roof surfaces account for 50-70% of the total land space of urban areas. Dr. McPherson concludes that "reduction in atmospheric carbon dioxide are achieved directly through sequestration and indirectly through emission reductions." Trees reduce carbon dioxide in the air, thereby reducing the warming and "greenhouse" effect of the gas. Further, by providing shade and transpiring water, trees lower air temperature, and, therefore, cut energy use, which reduces the production of carbon dioxide at the power plant. The County should require that all streets be planted with public or special district maintained street trees that will provide a canopy fully covering the streets within 15-20 years. For wide streets, the City should require a center planting area to accommodate street trees. Further, the EIR requires only street tree planting in parking lots that provides 50% coverage in 15 years. Feasible mitigation would include planting twice the number of trees in parking lots so that there was full coverage in 15 years. The EIR does not discuss as a mitigation measure for greenhouse gases the planting of groups of trees that have a significant impact on reducing CHGs by sequestering CO₂. Redwood trees are especially affective at reducing CHGs and air pollutants. The EIR should consider as a mitigation measure the planting of urban forests in areas within and around the proposed Project.

B

One of the mitigation measures included in the Project mitigation measures is the provision of approximately 294 park and ride spaces. For a Project that is projected to result in 195,246 vehicle trips per day, 300 park and ride lots is a minuscule number. As a feasible mitigation, the EIR should adopt as a feasible mitigation measure the provision of 1,000 park and ride lots within the Project.

C

As part of the mitigation measures, the EIR discusses encouraging the installation of solar electric collectors. Solar energy systems are the most effective way to reduce greenhouse gas

D

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generation. The EIR does not discuss requiring the installation of solar water heaters for domestic hot water with respect to each house. This is a feasible mitigation measure, and the County has the authority to require it as a mitigation measure for greenhouse gases. Solar hot water is both cheap and effective.

D cont.

The attached article from the Seattle Times dated March 31, 2007, discusses a development that will include zero energy homes. While a development of zero energy homes may not be economically feasible for the Placer Vineyards, the installation of solar electric panels on each house is feasible. The cost for a 5,000 watt system which should meet the energy needs of an efficient home is approximately \$23,000.00. In the article from the Seattle Times Mr. John Ralston, Vice President of Sales and Marketing for Premier Homes in Roseville, California, is quoted. He states that his firm is developing an all solar development in Yuba City. Requiring solar electric panels of 3-5 kilowatts in each home is a feasible and effective measure to reduce greenhouse gases. The homes will be cheaper to operate and therefore the owners will have lower carrying costs. If the square footage of the homes have to be reduced slightly to accommodate the cost of the solar panels, the homes will generate even less greenhouse gases due to the lower square footage. As set forth in the attached Fact Sheet from the Solar Energy International Association, a 1 kilowatt photovoltaic system each month prevents 150 pounds of coal from being mined, prevents 300 pounds of carbon dioxide from entering the atmosphere, keeps 105 gallons of water from being consumed, and reduces nitrous oxide and sulfur dioxide from being released into the environment.

E

There are other feasible mitigation measures to reduce greenhouse gases. The Project developers can be required to purchase offsets by financing windmill production of electricity offsite. 100 kilowatt hours of wind power each month is equivalent to planting one-half acres of trees or not driving 2400 miles. The EIR should consider feasible mitigation to reduce the non-transportation CO₂ emissions to zero. If each house is not fitted with photovoltaics and solar hot water heaters, the EIR may require the planting of trees or furnishing windmills offsite as a carbon dioxide offset.

F

Feasible mitigation would include requiring all lightbulbs in all houses to be energy saving compact fluorescents.

G

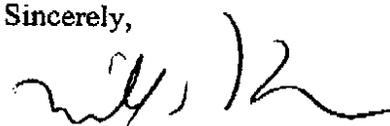
As further mitigation, Placer County should be required to purchase only hybrid service vehicles for the Placer Vineyards area. This would reduce both CO₂ emissions and other air pollutant emissions.

H

As further mitigation, the County should adopt a ban on the use of gas powered lawn mowers and gardening equipment as a CC&R in the Project area.

I

Sincerely,



WILLIAM D. KOPPER

WDK:kgr



SMITH ENGINEERING & MANAGEMENT

May 10, 2007

Mr. William D. Kopper
Attorney at Law
417 E Street
Davis, CA 95616

**Subject: Placer Vineyards Specific Plan Second Partially Recirculated Revised
Draft Environmental Impact Report**

P06003

Dear Mr. Kopper:

Per your request, I have reviewed the Second Partially Recirculated Revised Draft Environmental Impact Report (hereinafter the 2PRRDEIR) on the proposed Placer Vineyards Specific Plan (hereinafter "the project"). My review has concentrated on the transportation and circulation component. I previously commented on the prior versions of the environmental documentation for this project. My qualifications to perform this review are summarized in the prior letters and are incorporated herein by reference. This letter-report summarizes my comments on the 2PRRDEIR.

AM Traffic Impact Analysis Still Incomplete

The 2PRRDEIR partially responds to our (and other) prior comments regarding the need for an AM peak analysis by providing AM analysis for areas under Placer County and Sutter County jurisdiction (AM analysis was previously provided for Sacramento County). The validity of our comments about need for AM peak analysis is affirmed by the results. In the "existing plus project" condition, the new AM analysis discloses conditions requiring one new mitigation measure in Placer County (Measure 4.7-3b ii) and one in Sutter County (Measure 4.7-8b 4). In the "cumulative" condition, the AM analysis discloses conditions that necessitate two new mitigation measures in Placer County (Measures 4.7-13b iii and 4.7-13b iv).

However, the AM analysis is not comprehensive for the entire project traffic impact area; it omits AM analysis for locations in the City of Roseville on the grounds that the Roseville General Plan only mentions PM analysis. This critical omission that renders the document inadequate. As demonstrated above, the analysis in the 2PRRDEIR validates the need for a separate AM analysis. Because Roseville's major streets are in many cases at skewed angles to the freeway system, to the major crossings of railroads and to each other, the Roseville street network is a classic example of a street configuration in which AM traffic impacts *would not* be expected to be the reciprocals of PM patterns and *would not* be expected to be generally less than the impacts in the PM. The attitude expressed in the

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J

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2PRRDEIR essentially says, "if Roseville is silly enough to not require an AM peak analysis, we will take advantage of it and let a sleeping dog lie." Such an attitude is inconsistent with CEQA's requirement of good faith effort to disclose impact.

J cont.

Analysis of Grade Crossing of UPRR and Riego Road Inadequate

The new analysis of the grade crossing of Riego Road and the Union Pacific Railroad tracks in the 2PRRDEIR is unnecessarily judgmental, insufficiently supported and inadequate. The analysis concludes that there is no significant impact because the number of traffic lanes proposed in each future scenario provides adequate capacity for the future traffic volume (without ever considering the issue of future traffic delays and queuing due to train crossings), and, without substantiation, that the existing grade crossing protection would remain safe at the higher traffic volumes and higher numbers of future traffic lanes.

Such an unsubstantiated judgmental analysis is needless because the Federal Railroad Administration provides a procedure for estimating numbers of accidents at highway-rail grade crossings. The procedure, documented in *GradeDec.Net, System for Highway Rail Grade Crossing Investment Analysis, Reference Manual*¹ defines a quantified method of predicting grade crossing accidents based on number of trains, motor vehicle traffic volume, train speed, number of tracks, number of traffic lanes, type of grade crossing protection and similar factors. The 2PRRDEIR's analysts could easily have used this procedure to quantitatively determine whether the changes in the roadway traffic volume and the number of traffic lanes resulting from the project and from cumulative growth would cause an increase in numbers of accidents that is significant prima facie. Or, to further provide a quantitative basis for assessment, they could have plugged the predicted accident experience and other data from the above FRA procedure into the formula that the California Public Utilities Commission uses to establish priorities for funding highway-railroad grade separations. In this way, the crossing's theoretical placement on the PUC priority list under the future development scenarios could be estimated. Realizing that only the most problematic crossings statewide are nominated to the PUC list, a theoretical score² that would place this crossing among the top half or even top two-thirds of the PUC rankings would be indicative of a highly significant impact.

K

Although changes in train volume are not readily known, it is noteworthy that the rail line in question is the primary access to one of the three east-west transcontinental rail routes serving California. An incident on one of the other two east-west routes such as the one currently active the former SP route paralleling I-80 (due to the fire on a trestle in Sacramento) can easily double rail traffic for a lengthy period of time. Hence, the evaluation should include a sensitivity analysis that assesses the safety issues in the context of major variations of rail traffic in combination with the project and cumulative vehicle traffic growth.

¹ U.S. Department of Transportation, Federal Railway Administration, March, 2005.

² The score is "theoretical" since the actual PUC priority list computation only considers actual accidents over the prior 10-year period, not projected accidents.

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Because there are accepted and easily employed quantitative methods for assessing the grade crossing issue, the purely judgmental analysis presented in the 2PRRDEIR is inadequate.

K cont.

Traffic Impact Analysis Still Based on Faulty Traffic Forecast Data

In previous comments on the series of environmental documents on the Placer Vineyards Specific Plan, we (and others) pointed out that the traffic analysis failed to fully disclose the impacts of the project because the traffic forecasts underlying the impact analysis are generated in a forecast model process that excessively redistributes and reassigns other non-project travelers away from the principal streets and highways impacted by project traffic (see our letter of 1-24-07 for example). No changes in the basic traffic forecast analyses have been made in response to these comments and the new AM analysis in the 2PRRDEIR described above and the new railroad grade crossing analysis contained in the 2PRRDEIR are both also based on the same flawed traffic forecast procedure. Hence, the new AM and rail grade crossing analyses are critically flawed and deficient due to the serious flaw in the traffic forecasts on which they are based.

L

Conclusion

Based on these findings plus the our many other comments on preceding volumes of environmental documentation on the project that have not been adequately responded-to, we remain convinced that the environmental documentation on this project remains inadequate for CEQA purposes.

M

Sincerely,

Smith Engineering & Management
A California Corporation



Daniel T. Smith Jr., P.E.
President



**Urban Tree Planting and Greenhouse Gas
Reductions – Discussion Paper**

Greg McPherson, Ph.D.

USDA Forest Service

Center for Urban Forest Research

Davis, CA

March 7, 2007

Several stories have appeared recently in popular news outlets suggesting that trees are not a solution in the fight against global warming. In a report from Reuters (“Trees take on greenhouse gases at Super Bowl”, 30 January 2007), Dr. Ken Caldeira, a Carnegie Institute climate scientist, was reported to say, “It’s probably a nice thing to do, but planting trees is not a quantitative solution to the real problem.” Dr. Philip Duffy of Lawrence Livermore National Laboratory said, “If you plant a tree (CO₂ reductions are) only temporary for the life of the tree. If you don’t emit in the first place, then that permanently reduces CO₂.” Dr. Caldeira had made similar arguments previously in an op-ed in the *New York Times* (“When Being Green Raises the Heat, 16 January 2007).

A *New Scientist* article (“Location is key for trees to fight global warming,” 15 December 2006) reports results from a study by ecologist Dr. Govindasamy Bala of Lawrence Livermore National Laboratory. The model developed by Bala and colleagues indicates that, while trees planted in tropical regions have a clear net cooling effect, trees planted in mid-latitudes may absorb so much heat from the sun that they actually contribute to warming.

These stories fail to capture the complexity of the role that city trees play in fighting global climate change. Trees reduce carbon dioxide in the air, thereby reducing the warming “greenhouse” effect of the gas, in two main ways. First, as they grow, they take carbon dioxide out of the air and transform it into roots, leaves, bark, flowers, and wood. Over the lifetime of a tree, several tons of carbon dioxide are taken up (McPherson and Simpson 1999). In fact, trees are the only known feasible way to remove carbon dioxide from the atmosphere. Even if we were able to switch immediately to fuel sources that do not emit carbon dioxide, the current levels in the air are higher than at any time in the past 400,000 years, according to the UN’s International Panel on Climate Change, and because of the long “lifetime” of carbon dioxide, will remain so for decades or even centuries.

Second, by providing shade and transpiring water, trees lower air temperature and, therefore, cut energy use, which reduces the production of carbon dioxide at the power plant. Two-thirds of the electricity produced in the United States is created by burning a fuel (coal, oil, or natural gas) that produces carbon dioxide—on average, for every kilowatt hour of electricity created, about 1.39 lbs of carbon dioxide is released (eGRID 2002). It is certainly true, as Dr. Duffy states, that not emitting carbon dioxide in the first place is a good strategy. Lowering summertime temperatures by planting trees in cities is one way to reduce energy use and thereby reduce carbon dioxide emissions.

To address the other claims made above: *Are carbon dioxide and other greenhouse gas reductions from tree planting temporary?* In a sense, yes, greenhouse gas reductions are temporary if trees are removed and not replaced. To achieve long-term reductions, a population of trees must remain stable as a whole. This requires a diverse mix of species and ages so that the overall tree canopy cover remains intact, even as individual trees die and are replaced. Although sequestration rates will level off once an urban tree planting project reaches maturity, the reduced emissions due to energy savings will continue to accrue annually. Dead trees can be converted to wood products or used as bioenergy, further delaying, reducing, or avoiding greenhouse gas emissions.

Dr. Caldeira suggests in the Super Bowl article that tree planting projects are "risky." They may appear more risky than reducing emissions by building solar or wind farms because the tree-related climate benefits are less easy to document and because the 50- to 200-year life span of a tree seems less permanent than a new power plant. This uncertainty can be offset by legally binding instruments such as contracts, ordinances, and easements that guarantee tree canopy in perpetuity. And, of course, trees and alternative energy sources are not mutually exclusive—both have a place in reducing carbon dioxide emissions.

Will urban tree planting in mid-latitude cities result in zero or even negative climate benefits? Dr. Bala's study in the New Scientist article describes two main ways trees lower temperature: they remove carbon dioxide from the air, reducing the greenhouse effect, and they release water vapor, which increases cloudiness and helps cool the earth's surface. But because tree leaves are dark, they also absorb sunlight, which increases the temperature near the earth's surface. The difference between trees in tropical latitudes and those in mid-latitudes has to do with the difference in how much sunlight forests reflect compared to other possible surfaces, especially during winter. Snow reflects more sunlight back into the atmosphere than forest vegetation, resulting in less heat trapped near the earth's surface. Large-scale tree planting projects that replace highly reflective surfaces with forests will result in more heat trapped near the ground during winter.

In cities, this fact is less relevant. Asphalt, concrete, and roof surfaces account for 50 to 70% of urban areas, with the remaining area covered by trees, grass, and bare soil. The difference in the solar reflectances, or albedos, of the different urban surfaces is small. Vegetation canopies have albedos of 0.15 to 0.30, the albedo of asphalt is 0.10, that of concrete and buildings is 0.10 to 0.35, and the overall albedo in low density residential areas is 0.20 (Taha et al. 1988). In cities, increasing urban tree canopy cover does not appreciably alter surface reflectance, or increase heat trapping.

At the same time, as described above, a number of field and modeling experiments have found that urban trees reduce summertime air temperatures through evapotranspiration and direct shading (Akbari and Taha 1992, Rosenfeld et al. 1998, McPherson and Simpson 2003). This reduces energy consumption and the emissions related to energy generation.

Do tree-planting projects give people a "feel-good illusion that they are slowing global warming?" The climate benefits of trees in mid-latitude cities are not an illusion, although they certainly feel good. Reductions in atmospheric carbon dioxide are achieved directly through sequestration and indirectly through emission reductions. Still, planting trees in cities should not be touted as a panacea to global warming. It is one of many, complementary bridging strategies, and it is one that can be implemented immediately. Moreover, tree planting projects provide myriad other social, environmental, and economic benefits that make communities better places to live. Of course, putting the right tree in the right place remains critical to optimizing these benefits and minimizing conflicts with other aspects of the urban infrastructure.

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"Zero-energy" homes planned in Issaquah

By Sonia Krishnan
Seattle Times Eastside bureau

Your future home could come from the recycling bin.

Solar energy would power it.

The best part? Utility bills would be next to nothing.

They're called "zero-energy" homes — homes designed to produce as much electricity as they consume. And in Issaquah, city officials are planning an unusual partnership with a builder to construct King County's first community by 2009.

"This would be the first step in a new paradigm for green development," said Brad Liljequist, sustainable-building and lead urban-design consultant for the Issaquah project.

The 10 energy-saving town houses in the Issaquah Highlands will be aimed at the median market.

"We don't want this to be for an exclusive few," he said.

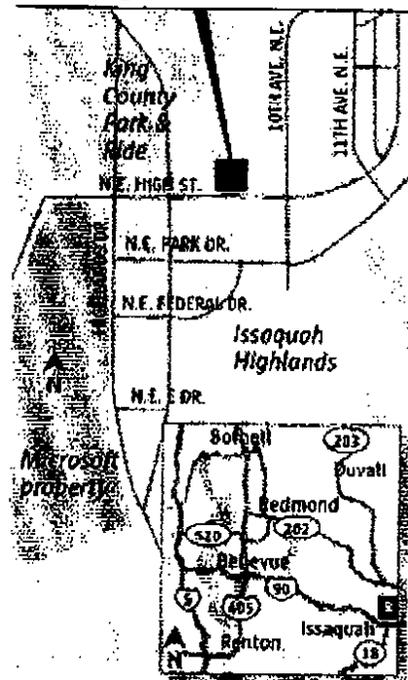
The city's efforts follow in the path of a U.S. Department of Energy program pushing zero-energy home construction. "Building America" began in 1995, with a goal to trim household energy use by 70 percent by 2020.

About 2,000 zero-energy homes have been built around the country since 2003, said Tim Merrigan, senior program manager for the National Renewable Energy Laboratory in Golden, Colo.

Federal and state tax credits, coupled with financial incentives from utility companies, are driving the trend forward, builders say.



Zero-energy project site



THE SEATTLE TIMES

While the ultimate goal is to get to zero, most homes end up slashing utility bills 50 percent to 70 percent, Merrigan said.

That's enough to draw increasing numbers of buyers in fast-growing states such as Arizona and California, where residents face some of the nation's highest energy costs. In Washington state, another zero-energy community is planned for Lopez Island, San Juan County.

The timing seems ripe.

In November, the environmental catchphrase "carbon neutral" was selected as The New Oxford American Dictionary's "Word of the Year." Three months later, a team of international climate scientists declared humans to blame for global warming. And late last month, former Vice President Al Gore's documentary on global warming, "An Inconvenient Truth," won an Oscar.

"You could say it's reached a tipping point," Merrigan said.

Residential buildings in America contributed 21 percent of the country's carbon-dioxide emissions to the environment in 2005, according to the U.S. Department of Energy. Inefficient heating and cooling systems, poor insulation and energy-sucking appliances, such as outdated refrigerators, are mostly to blame for high fuel consumption.

Then there's the "standby factor."

Keeping appliances such as stereos, computers and televisions plugged in all day consumes between 500 and 1,000 kilowatt-hours a year per household, said Alan Meier, scientist for Lawrence Berkeley National Laboratory, who has written on the phenomenon.

That's comparable to about one month of power consumption, he said, and equals at least 700 pounds in carbon-dioxide emissions.

"Standby power is one of the biggest obstacles to achieving a zero-energy home," Meier said.

In Issaquah, staff members say they're undeterred by the challenges. The City Council recently approved \$50,000 to study the project. Over the next two years, the city plans to collaborate with a builder and develop the project's design and energy-efficient standards. It will run an educational program for homebuilders and homeowners once the project is built.

The town homes would sit on a half-acre on Northeast High Street in the Issaquah Highlands. The proposed site was donated by Port Blakely Communities, developer of the Highlands, to use as a demonstration tool for future homebuilding, said Judd Kirk, president of Port Blakely.

According to preliminary plans, the homes will range from 500 to 1,700 square feet. The project would:

- Reduce water use by 50 percent over the average household by installing low-flush toilets that use stormwater collected from rooftops and filtered in a nearby tank. This reclaimed water would not be



PREMIER HOMES

This zero-energy community is in Sacramento, Calif. The 10 proposed town houses in Issaquah would have similar energy-efficient features.

used for drinking or showering.

- Produce no stormwater discharge through green roofs and permeable pavement.
- Use a "very high percentage" of locally sourced or recycled materials.
- Use highly durable materials, such as metal roofing instead of asphalt shingles and hardwood floors instead of carpeting.

Issaquah is ahead of most cities when it comes to building "green," environmental advocates say. In 2004, for instance, the city hosted tours and seminars on the Built Green Idea Home — a model home in the Highlands — to inspire people about eco-friendly choices.

"We're trying to be responsive to climate change," said David Fujimoto, manager of Issaquah's resource-conservation office. "Our goal is to really push the envelope and encourage new construction to achieve the highest level of environmental performance possible."

Recycled materials play a big role in zero-energy homes. Lumber planks made from wood and plastic bottles are used for decks, doors or window frames. And fibers taken from recycled newspapers are turned into insulation.

Using the latest technology, zero-energy homes are fitted with rooftop solar panels that convert the sun's rays into electricity.

During the Northwest's long summer days, the homes would send extra kilowatts back to the local utility grid. In the dark winter months, the homes would draw on that power. At the end of the year, the home's net energy use should, theoretically, equal zero.

Most zero-energy homes also come with tankless water heaters, energy-efficient appliances, heavy insulation and improved air-conditioning and heating systems.

The intricate systems help keep indoor temperatures stable, said Chuck Murray, energy specialist for Washington State University and a consultant for Issaquah's project.

If homeowners produce more electricity than they use, utility companies are required to credit them for it under Washington's net-metering law. And, under a state law that took effect last year, those who generate solar energy for the power grid could earn up to \$2,000 a year in cash reimbursements through 2014.

Zero-energy homebuilders say they're seeing more demand as fuel prices rise.

"When we started doing this four years ago, gas was \$1.50 a gallon. Energy efficiency was not in the top five things homeowners were looking for," said John Ralston, vice president of sales and marketing for Premier Homes in Roseville, Calif., near Sacramento.

But sales have taken off so well that an all-solar development is under way in Yuba City, Ralston said.

State-of-the-art-efficiency doesn't come cheap.

The features could tack about \$100,000 on to the Issaquah units, Liljequist said. Rebates and tax credits would help offset that, he said. And strides in technology have made solar panels cheaper and easier to work with than in years past.

But most of all, he said, shrinking square footage will keep costs in line.

"Rather than having that extra-large bonus room, we want to put that money towards living more lightly on the earth," he said.

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Energy Facts

Energy Consumption

- Though accounting for only 5 percent of the world's population, Americans consume 25 percent of the world's energy. (*American Almanac*)
- In 1997, U.S. residents consumed an average of 12,133 kilowatt-hours of electricity, almost nine times greater than the average for the rest of the world. (*Grist*)
- Worldwide, some 2 billion people are currently without electricity. (*U.S. Dept. of Energy*)
- Total U.S. residential energy consumption is projected to increase 17 percent by 2015. (*U.S. Energy Information Administration*)
- World energy consumption is expected to increase 40% to 50% by the year 2025. The global mix of fuels--renewables (18%), nuclear (4%), and fossil (78%)--is projected to remain substantially the same as today; thus global carbon dioxide emissions are expected to increase 50% to 60%.
- Among industrialized and developing countries, Canada consumes per capita the most energy in the world, the United States ranks second, and Italy consumes the least among industrialized countries.
- Developing countries use 30% of global energy. Rapid population growth, coupled with economic growth, will rapidly increase that percentage in the next 10 years.
- The World Bank estimates that investments of \$1 trillion will be needed in the next 30 years to meet developing countries' needs alone.
- America uses about 15 times more energy per person than does the typical developing country.
- Residential appliances, including heating and cooling equipment and water heaters, consume 90% of all energy used in the U.S. residential sector.
- The United States spends about \$440 billion annually for energy. Energy consumers spend \$200 billion and U.S. manufacturers \$100 billion annually.

Global Warming

- Worldwide, 1995 was the warmest year since global temperatures were first recorded. This supports the near consensus among climatologists that emissions of carbon dioxide and other gases are causing global warming. (*Chivian and Epstein, Boston*)

- On average, 16 million tons of carbon dioxide are emitted into the atmosphere each hour by human use worldwide. (*U.S. Department of Energy*)
- Carbon emissions in North America reached 1,760 million metric tons in 1999. Increase since 1970. They are expected to grow another 31 percent, to 2,311 million metric tons, by the year 2020. (*U.S. Department of Energy*)
- The United States is the world's largest single emitter of carbon dioxide, accounting for 23 percent of energy-related carbon emissions worldwide. (*U.S. Department of Energy*)
- An average of 23,000 pounds of carbon dioxide are emitted annually in each home. (*U.S. Environmental Protection Agency*)
- The transportation sector consumed 35% of the nation's energy in 1990; this is dependent on petroleum.
- Fossil fuels are depleted at a rate that is 100,000 times faster than they are replaced.

Health

- Approximately 30,000 lives are cut short in the U.S. each year due to pollution from electricity production. (*ABT Associates study*)
- About 81 tons of mercury are emitted into the atmosphere each year as a byproduct of power generation. Mercury is the most toxic heavy metal in existence. (*U.S. Environmental Protection Agency*)
- Burning fossil fuels to produce energy releases carbon dioxide and other global warming causing gases into the atmosphere. Global warming will increase the incidence of diseases (including equine encephalitis and Lyme disease), death from heat waves, blizzards, and floods, and species loss. (*Chivilian and Epstein, Boston Globe*)

Transportation

- The United States consumes about 17 million barrels of oil per day, of which two-thirds is used for transportation.
- The United States imports more than seven million barrels of oil per day.
- While the world's population doubled between 1950 and 1996, the number of cars increased tenfold. Automobile congestion in the United States alone accounts for 1 billion in wasted fuel, lost productivity, and rising health costs. Still, analysts predict that the world's fleet of cars will double in a mere 25 years. (*Worldwatch Institute*)
- Americans use a billion gallons of motor oil a year, 350 million gallons of which are used for polluting the environment. (*Department of Energy and Maryland Energy Administration*)
- A car that gets 20 miles per gallon (mpg) emits approximately 50 tons of global warming inducing carbon dioxide over its lifetime, while a 40-mpg car emits only 25 tons. Over the average lifetime of an American car (100,000 miles), a 40-mpg car will also save approximately \$3,000 in fuel costs compared to a 20-mpg car. (*Natural Resources Defense Council*)

- The cars and trucks reaching the junkyards this year have higher gasoline mileage average, than the new ones rolling off dealers' lots, for the first time on record. (The New York Times, August 11, 1997)

Renewables

- Only 7.5 percent of total U.S. energy consumption came from renewable sources. Of that total, 94 percent was from hydropower and biomass (trash and wood). (U.S. Energy Information Administration)
- For the 2 billion people without access to electricity, it would be cheaper to install solar panels than to extend the electrical grid. (The Fund for Renewable Energy)
- Within 15 years, renewable energy could be generating enough electricity to power 1 billion homes and offset 70 days of oil imports.

Photovoltaics

- Providing power for villages in developing countries is a fast-growing market for photovoltaics. The United Nations estimates that more than 2 million villages lack electric power for water supply, refrigeration, lighting, and other basic needs. The cost of extending the utility grids is prohibitive, \$23,000 to \$46,000 per village in 1988.
- A one kilowatt PV system* each month:
 - prevents 150 lbs. of coal from being mined
 - prevents 300 lbs. of CO₂ from entering the atmosphere
 - keeps 105 gallons of water from being consumed
 - keeps NO and SO₂ from being released into the environment

* In Colorado, or an equivalent system that produces 150 kWh per month

Wind

- Wind power is the fastest-growing energy source in the world. (Worldwatch)
- The wind in North Dakota alone could produce a third of America's electricity. (Earth Day Guide to Planet Repair)
- Wind power has the potential to supply a large fraction--probably at least 20 percent--of electricity demand at an economical price.
- In 1990, California's wind power plants offset the emission of more than 2.5 million tons of carbon dioxide, and 15 million pounds of other pollutants that would have been produced.
- Using 100 kWh of wind power each month is equivalent to:
 - planting 1/2 acre of trees
 - not driving 2,400 miles

Solar Thermal

- Research shows that an average household with an electric water heater spends 15% of its home energy costs on heating water.
- Solar water heaters offered the largest potential savings, with solar water-heating saving as much as 50% to 85% annually on their utility bills over the cost of heating.
- You can expect a simple payback of 4 to 8 years on a well-designed and properly installed solar water heater. (Simple payback is the length of time required to recover investment through reduced or avoided energy costs.)
- Solar water heaters do not pollute. By investing in one, you will be avoiding nitrogen oxides, sulfur dioxide, and the other air pollution and wastes created by utility-generated power or by burning fuel to heat your household water. When a solar water heater replaces an electric water heater, the electricity displaced over 20 years avoids more than 50 tons of carbon dioxide emissions alone.

Alternative Fuels

- Using biodiesel in a conventional diesel engine substantially reduces emissions of hydrocarbons, carbon monoxide, sulfates, polycyclic aromatic hydrocarbons, and particulate matter.
- Biodiesel:
 - can be used at 100% levels or mixed in any proportion with No. 2 diesel.
 - Contains no nitrogen or aromatics
 - Typically contains less than 15 ppm sulfur - Does not contribute to sulfur emissions
 - Has characteristically low carbon monoxide, particulate, soot and hydrocarbon emissions
 - Contains 11% oxygen by weight
 - Has the highest energy content (BTUs) of any alternative fuel and is comparable to No. 1 diesel.
- Over 4,000 electric vehicles are operating throughout the United States (with the highest number in California and the western United States).
- More than 20,000 flexible-fuel vehicles are in operation.
- Over 75,000 natural gas vehicles in U.S. and nearly 1 million worldwide.

Energy Efficiency

- By taking appropriate energy-saving measures, by 2010 the United States could have a more efficient energy system that reduces costs by \$530 per household per year and reduces

warming pollutant emissions to 10 percent below 1990 levels. (*Energy Innov*

- Just by using the "off the shelf" energy-efficient technologies available today the cost of heating, cooling, and lighting our homes and workplaces by up to *Department of Energy and Maryland Energy Administration*)
- Replacing one incandescent lightbulb with an energy-saving compact fluores means 1,000 pounds less carbon dioxide is emitted to the atmosphere and \$ saved on energy costs over the bulb's lifetime. (*U.S. Environmental Protectio Alliance to Save Energy*)
- A decrease of only 1% in industrial energy use would save the equivalent of million barrels of oil per year, worth about \$1 billion.

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LETTER 59 WILLIAM D. KOPPER, ATTORNEY AT LAW

Response 59A: Commenter asserts that Mitigation Measures 4.13-1a through 4.13-1p proposed by the Revised Draft EIR “have limited, if any impact.” The commenter provides no specific examples or reasons to support this assertion. Notably, “CEQA does not require analysis of every *imaginable* alternative or mitigation measure; its concern is with *feasible* means of reducing environmental effects.” (*Concerned Citizens of South Central Los Angeles v. Los Angeles Unified School Dist.* (1994) 24 Cal.App.4th 826, 841, italics in original.) The County believes that the Mitigation Measures proposed by the Revised Draft EIR would be feasible and effective, though no feasible mitigation measures are available to reduce the impact to a less than significant level. The County takes this opportunity to provide examples of the reasons that it believes the Mitigation Measures proposed in the Revised Draft EIR would be effective.

AB 32 requires the Air Resources Board (ARB) to establish a statewide greenhouse gas emission cap for 2020 based on 1990 emission levels. By June 30, 2007, ARB must identify a list of discrete early action greenhouse gas reductions that will be legally enforceable by 2010. By January 1, 2008, ARB must also adopt regulations that will identify and require selected sectors to report their statewide greenhouse gas emissions. By January 1, 2011, ARB must adopt rules and regulations to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gas reductions. ARB is authorized to enforce compliance with the program that it develops. ARB recently released its draft recommendations for discrete early emissions measures to reduce global warming emissions. California Air Resources Board (Apr. 20, 2007) Draft Proposed Early Actions to Mitigate climate Change in California, <http://www.climatechange.ca.gov/climate_action_team/reports/2007-04-20_ARB_early_action_report.pdf> (as of May 31, 2007).)

Mitigation Measures 4.13-1a through 4.13-1j, as set forth in the Second Partially Recirculated Revised Draft EIR (SPRRDEIR), cross reference Mitigation Measures proposed by the Revised Draft EIR to reduce the project’s impacts on air quality. It is well recognized that conventional air pollution controls measures have the co-benefit of reducing GHG emissions. (See e.g. Climate Protection Campaign and the Community Clean Water Institute (June 2005) Report on the Integration of Air Quality Management and Climate Protection, prepared for the Bay Area Air Quality Management District and the Sonoma County Waste Management Agency <<http://www.recyclenow.org/AirDistrict-PhaseTwo061205.pdf>> (as of May 31, 2007).) For example, ARB’s draft recommendations for discrete early emissions measures lists the ten conventional air pollution control measures that are scheduled for rulemaking in 2007, 2008, and 2009 as measures that will reduce greenhouse gas emissions. The Board included these measures in the report based on its determination that “conventional air pollution controls make an important contribution to climate protection.” (*Ibid.* at Section 6.) Because conventional pollution control measures also reduce GHG emissions, implementation of Mitigation Measures 4.13-1a through 4.13-1j, targeted at reducing conventional air pollutants, will likewise reduce greenhouse gas emissions for the Placer Vineyards Specific Plan project.

Mitigation Measures 4.13-1k cross references mitigation measures proposed by the Revised Draft EIR to reduce the project’s impacts on traffic. As discussed on page 4.13-16 of the Second Partially Recirculated Revised Draft EIR, traffic calming measures reduce GHG emissions by

allowing engines to operate more efficiently and by making roads safer for pedestrians and bicyclists. Implementation of Mitigation Measure 4.13-1k would, therefore, serve to reduce the PVSP project's impact on global climate change.

Mitigation Measure 4.13-1l cross references mitigation measures aimed at waste diversion and recycling. Landfills are significant producers of methane gas, a potent GHG. The California Energy Commission (CEC) estimates that methane emissions account for approximately 5.7 percent of gross 2004 GHG emissions in California. (California Integrated Waste Management Board (May 18, 2007) "Funds approved to cut Greenhouse Gas: Manual would guide landfills on how to cut emissions" <<http://www.ciwmb.ca.gov/PressRoom/2007/May/28.htm>> (as of June 1, 2007).) It is recognized that measures to increase recycling and waste reduction diversion will reduce GHG emissions by, for example, avoiding emissions from the energy-intensive processing of raw materials. (Flex Your Power, How is California Government Responding to Climate Change? <http://www.fypower.org/feature/climate/ca_gov.html> (as of June 1, 2007).) Implementation of Mitigation Measures 4.13-1l would, therefore, serve to reduce the project's impact on global climate change.

Mitigation Measures 4.13-1m and 4.13-1o are aimed at providing information on how individual members of the community may increase energy efficiency, conservation and carbon sequestration. Individual choices can have important impacts on global climate change. Indeed, Americans' per capita GHG emissions are more 5.6 tons, more than twice that of Western Europeans. (Union of Concerned Scientists, Global Warming: Ten Personal Solutions <http://www.ucsusa.org/global_warming/solutions/ten-personal-solutions.html> (as of June 1, 2007).) Implementation of Mitigation Measures 4.13-1m and 4.13-1o would encourage and educate individuals in the community on ways to increase energy efficiency and reduce GHG emissions, and would, therefore, help reduce the GHG emissions in the Placer Vineyards Specific Plan area.

Mitigation Measure 4.13-1n requires the Applicants to pay for an initial installment of Light Emitting Diode (LED) traffic lights in all Specific Plan area traffic lights. Traditional traffic signals consume significant amounts of energy. (U.S. Environmental Protection Agency (Jan. 2000) Climate Change Technologies: Light-Emitting Diodes <[http://yosemite.epa.gov/oar/globalwarming.nsf/UniqueKeyLookup/SHSU5BURD4/\\$File/light-emittingdiodes.pdf](http://yosemite.epa.gov/oar/globalwarming.nsf/UniqueKeyLookup/SHSU5BURD4/$File/light-emittingdiodes.pdf)> as of June 1, 2007).) Approximately 30 California municipalities have installed LED traffic signals, which use much less power and last much longer than incandescent lights. (*Ibid.*) Because LED traffic lights are a known method of reducing GHG emissions, implementation of Mitigation Measure 4.13-1n would effectively reduce the PVSP project's contribution to global climate change.

Finally, Mitigation Measure 4.13-1p requires prioritized parking within commercial and retail areas for electric, hybrid and alternative fuel vehicles. This measure is effective in that it would create an incentive for individuals to purchase fuel efficient vehicles. For these reasons, the County the Mitigation Measures included in chapter 4.13 of the Revised Draft EIR will be effective.

Response 59B: The commenter states that the mitigation measures encouraging residential homeowners to plant deciduous trees on the south and west side of homes is only advisory. The commenter is apparently referring to mitigation measure 4.13-1b, which cross references Mitigation Measure 4.8-3b. Mitigation Measure 4.8-3b sets forth a menu of options that the County must use singularly or in combination to accomplish an overall reduction of 10 to 20% in residential energy consumption relative to the requirements of State of California Title 24. One of the measures listed is establishing tree-planting guidelines that require residents to plant tree shade buildings primarily on the west and south sides of the buildings. The County and the Applicants are committed to reducing energy consumption and GHG emissions under the proposed project. For that reason, Mitigation Measure 4.8-3b requires residential development to reduce energy consumption above and beyond the requirements of Title 24. It is well recognized that programs that promote energy efficiency in residential design (as does Title 24) reduce energy consumption which in turn reduces GHG emissions. (See e.g. U.S. Environmental Protection Agency, Climate Change – What You Can Do: State Action Recommendations: California: <<http://yosemite.epa.gov/gw/StatePolicyActions.nsf/exhibit?OpenForm&tier=0&state=California&type=state>> (as of May 30, 2007).

The fact that Mitigation Measure 4.13-1b (and 4.8-3b) presents a range of options to reduce residential energy consumption by 10 to 20% above Title 24 requirements reflects the early phase of potential development of the Placer Vineyards Specific Plan area. The proposed development is at a very early stage in the planning process, and, as such, mitigation measures proposed for the revised draft Specific Plan project are necessarily general in nature. (See also Response to Comment 65G; see also *Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 376.) If the proposed Specific Plan is adopted, the County will have additional opportunities, in considering individual projects (tentative subdivision maps, use permit applications, etc.), to translate the general mitigation requirements into more specific measures or conditions. Mitigation Measure 4.13-1b (and 4.8-3b) would reduce GHG emissions associated with such site-specific approvals by requiring residential units to reduce energy consumption by 10 to 20% above the requirements of Title 24. Although tree planting is just one of the methods by which this goal may be achieved, the end result would be the same. Accordingly, implementation of Mitigation Measure 4.13-1b would effectively reduce GHG emissions associated with the proposed project. No change to the EIR is necessary.

The commenter states that the County “can require much more with respect to tree plantings to reduce CO₂ emissions.” In addition to mitigation measure 4.13-1b (discussed above), Mitigation Measure 4.13-1a establishes guidelines for County review of future project-specific submittals for non-residential development within the Specific Plan area in order to reduce generation of air pollutants. One such guideline is that all new parking lots should include the planting of trees designed to result in 50% shading of parking lot surface area within 15 years.

The draft specific plan alternatives (base plan and blue print alternative), and their goals and policies regarding landscaping, are firmly based on the principles expressed in this request. These policies are included and addressed in the revised draft EIR. The draft specific plan alternatives include plans for tree-lined streets and sidewalks, oak-grove open spaces, shade trees in proposed mini-parks and village centers, as well as several policies related to tree planting and tree preservation (see e.g. draft Specific Base Plan pages. 2-2, 2-3, 4-2, 3-13, 4-5, 4-6, 5-4, 6-2,

through 6-7, 6-14, 6-20, 7-18 and draft Specific Plan Blueprint Alternative pages 2-3, 2-9, 3-2, 3-13, 4-1, 4-6, 4-7, 5-5, 6-2 through 6-8, 6-20, 6-26, 7-19, 7-20). In addition, a recommended tree plant list is included as Appendix B to the draft specific plan alternatives.

The commenter states that the County should “require all streets be planted with public or special district maintained street trees that will provide a canopy fully covering the streets within 15-20 years” and that for wide streets the, the County should “require a center planting area to accommodate street trees.” Policy 6-1 of both draft specific plan alternatives requires the County to develop and approve a Landscape Master Plan under which thoroughfares and arterial streets would be lined with rows of trees for shade will be planted in the medians and deciduous and evergreen canopy trees will be planted between curbs and sidewalks, with evergreen screen trees placed between sidewalks and residential walls. Major collector streets would be landscaped with a 20-foot landscape setback area in which large deciduous canopy tree or other thematic landscape combination would be established per street. The same tree or repetition of trees would be planted within landscaped area on both sides of the street at regular intervals for the entire road segment. Minor collector streets and local streets would be landscaped with single, large deciduous canopy trees planted at regular intervals (at approximately 25-30 foot intervals or at a distance that provide appropriate spacing for the type of tree selected) on both sides of the street for the entire length of the road (Policy 6.6). The rationale behind requiring trees to be planted at approximately 25-30 foot intervals is to create a shaded canopy along pedestrian travel ways. (Policy 6.7)

The commenter correctly notes that the EIR requires street planting in parking lots that would provide 50% coverage in 15 years. The commenter asserts that feasible mitigation would include planting twice the number of trees in parking lots so that there would be full coverage in 15 years. The commenter does not provide information on why a 100% canopy would be feasible. A 50% canopy is consistent with the Sacramento Tree Foundation’s recommendations <<http://www.sactree.com/aboutUs/programsServices/greenprint/greenprintToolkit/assets/RegionalCanopyGoalReport.pdf>> (as of May 30, 2007) and other regional planning guides (see e.g. City of Davis Parking Lot Shading Guidelines and Master Parking Lot Tree List, <http://www.cityofdavis.org/cdd/pdfs/planning/forms/Parking_Lot_Shading_Guidelines.pdf> (as of May 30, 2007).), and would constitute a minimum coverage standard. Requiring a greater percentage of canopy coverage would be infeasible because parking lot dimensions would have to increase in order to accommodate tree root zones (typically 1.5 times the tree canopy) and because maintenance expenses associated with doubling the number of trees would be excessive. The 100% coverage advocated by the commenter is on its face impractical and inconsistent with other considerations common to parking area design, including visibility, safety, and lighting.

The commenter states that the EIR does not discuss as a mitigation measure the planting of groups of trees that have a significant impact on reducing GHGs by sequestering CO₂. As noted, the proposed draft Specific Plan envisions maintaining groves of trees that will aid in carbon sequestration. For example, the Specific Plan area would preserve 709 acres of contiguous open space that will protect natural oak groves and include significant on-site oak groves. (See e.g. Goals 3.4, 3.6.) The commenter notes that redwood trees are especially affective at reducing GHGs and air pollutants. The recommended plant list for the specific plan includes redwood (*Sequoia sempervirens*) for gateways and entries. The proposed distribution for the redwood is

“large screen evergreen,” meaning that such trees are most appropriate where there is need for a significant (and tall) vegetative buffer. If the County adopts either of the proposed specific plans, it will consider the commenter’s observation in its development of its Landscape Master Plan for the project.

The commenter suggests that the EIR should consider as mitigation measure the planting of urban forests in areas within and around the proposed Project. The commenter does not define “urban forest.” *Urban forest* is generally defined as a collection of trees growing in an urban area and the plants that grow beneath them; the trees and associated living organisms in an urban area, or a dense, widespread growth of trees and other plants covering an urban area. If implemented, the landscape and streetscape goals and policies included in the draft Specific Plan would provide a network of tree and plant growth that would meet the County’s understanding of the definition of urban forest. No change to the Revised Draft EIR is necessary.

To the extent that the commenter’s intent is to suggest that trees should be planted virtually everywhere within the project area (“the more trees the better”), any such suggestion would be infeasible for obvious reasons. Although, as discussed above, trees will become very abundant throughout the project area as it develops, trees inevitably take up space, consume water, and require maintenance, and it simply is not practical to plant so many trees that they would interfere with other land uses or interfere with the ability, in some land use districts, to achieve “smart growth” levels of density and intensity of land use. As the Sacramento Area Council of Governments has informed the County on numerous occasions, such densities and intensities are considered desirable because they reduce long-term land consumption in the region, and reduce per capita vehicle miles traveled and energy consumption. In other words, at some point, an attempt to create a dense urban forest in the midst of relatively dense or intense development will lead to a conflict with planning strategies intended to reduce GHG emissions.

Response 59C: The commenter raises concerns about the provision of park-and-ride lots. The commenter is incorrect that, as mitigation, the Revised Draft EIR proposes 294 park and ride spaces. The Revised Draft EIR analyzes the project as proposed with 193 park-and-ride spaces. The commenter is correct that the park-and-ride lots would serve a small portion of vehicle trips. These lots, however, are only one aspect of reducing vehicle use included in the Specific Plan. Other aspects of the Specific Plan that would reduce vehicle trips include a bike/pedestrian network throughout the plan area, reservation of right-of-way for light rail and a trolley and other transit facilities. The commenter suggests that the County adopt as mitigation the provision of 1,000 park-and-ride lots within the project area. A provision of 1,000 park-and-ride lots would not be feasible. In preparing the Revised Draft EIR, the County researched the number of park-and-ride spots that would reasonably be expected to be used at build-out. One-hundred-ninety-three spaces represent a conservative estimate in that the actual number of spaces projected to be used is much lower. In addition, the provision of 193 spaces is consistent with requirements imposed on the County by the Placer County Air Quality District (0.1% of the anticipated daily trips). Implicit in the commenter’s suggestion is the notion that transit ridership would necessarily increase if only more park and ride parking spots were available. The County is unaware of any evidence supporting such an assertion. People use their own vehicles, rather than transit, for a variety of reasons, with the main one being the convenience traditionally associated with a personal vehicle. While the County is sympathetic with the policy goal of

somehow enticing people out of their cars and onto transit vehicles instead, the County does not believe that “build it and they will come” is principle that applies in this situation. If, over time, empirical data suggest that more than 193 park and ride spaces will be needed in Placer Vineyards, the County will retain the option, in considering individual site-specific development applications, to require small park and ride facilities within individual projects, to supplement the 193 spaces that represent the minimum number within the overall project area.

Response 59D: The commenter suggests requiring the installation of solar water heaters for domestic hot water with respect to each house as a mitigation measure. Mitigation Measure 4.13-1b (cross referencing Mitigation Measure 4.8-3b) provides a menu of options available to the County that must be used singularly or in combination to accomplish an overall reduction of 10 to 20% in residential energy consumption relative to the requirements of State of California Title 24, such as the installation of photovoltaic rooftop energy systems. The County believes that a 10 to 20% reduction in average residential energy consumption is achievable and feasible, and that such a reduction would provide a meaningful reduction in greenhouse gas emissions. The applicant and the County will work together to identify the most appropriate means of achieving the reductions in energy consumption. The best technologies and strategies for achieving the reduction will likely change over the lifetime of project construction and occupation. Therefore, and in response to the commenter’s suggestions, Mitigation Measure 4.8-3b is modified as follows:

4.8-3b The following measures shall be used singularly or in combination to accomplish an overall reduction of 10 to 20% in residential energy consumption relative to the requirements of State of California Title 24:

- Use of air conditioning systems that are more efficient than Title 24 requirements;*
- Use of high-efficiency heating and other appliances, such as water heaters, including solar water heaters, cooking equipment, refrigerators, and furnaces;*
- Installation of photovoltaic rooftop energy systems; ~~and~~*
- Use of energy saving compact fluorescent light bulbs; ~~and~~*
- Establishment of tree-planting guidelines that require residents to plant trees to shade buildings primarily on the west and south sides of the buildings. Use of deciduous trees (to allow solar gain during the winter) and direct shading of air conditioning systems shall be included in the guidelines; and*
- Other new effective technologies and strategies that become available during project development.*

The commenter is also referred to Mitigation Measure 4.8-3k which also provides for new technologies and future feasible mitigation measures to be incorporated into the project.

It should also be recognized that, as described in Section 4.13 of the Second Partially Recirculated Revised Draft EIR, the State of California has taken a leadership role in addressing the trend of increasing GHG emissions. Such efforts include, but are not limited to:

- ***State of California Energy Action Plan:*** California Energy Commission (CEC), the California Power Authority (CPA), and the California Public Utilities Commission (CPUC) have adopted an “Energy Action Plan” (EAP) that sets forth a commitment to achieve joint goals for California’s energy future through specific actions. The second EAP (EAP II) describes a coordinated implementation plan for state energy policies that have been expressed through the Governor’s Orders, public positions, instructions to agencies, legislative direction and other energy related policies. (CEC et al., EAP II <http://www.energy.ca.gov/energy_action_plan/2005-09-21_EAP2_FINAL.PDF> (as of May 30, 2007).) The overarching goal of the EAP II is for California’s energy to be adequate, technologically advanced, affordable, and environmentally-sound. One of the key actions identified by the EAP II with respect to renewable energy and GHG emission reductions is to implement a cost-effective program to achieve the 3,000 megawatts (MW) goal of the Governor’s “Million Solar Roof’s initiative.” Another key action identified by the EAP is to establish a program to encourage solar hot water heating.
- ***The California Solar Initiative (CSI):*** California has set a goal to create 3,000 MW of new solar produced electricity by 2017. This Initiative is administered by the CPUC. On March 2, 2006, the CPUC opened a proceeding to develop rules and procedures for the Initiative and to continue considering policies for the development of cost-effective, clean, and reliable distributed generation of energy. On August 21, 2006, the Governor signed Senate Bill 1 (SB 1), which directs the Energy Commission to implement the Solar Initiative program within certain budget limits and specific requirements. CPUC rulemaking is currently in progress to reconcile its decisions with SB 1. Current incentives under the Initiative provide upfront, capacity-based payment for new solar systems. This incentive system will change in 2007, however, into performance-based payments. This shift in the incentive system has not yet occurred. (Go Solar California, The California Solar Initiative <<http://www.gosolarcalifornia.ca.gov/csi/index.html>> (as of May 31, 2007).)
- ***Title 24 Update:*** Title 24 is revised on a three-year cycle. The next update will be in 2008. It is widely recognized that Updates for the Title 24 Building standards will be an effective method by which the State may reduce GHG emissions. For example, the EAP II (described above) directs the CEC to adopt new building standards for implementation in 2008 that include cost-effective demand response technologies and the integration of photovoltaic systems. (CEC, 2008 Update to the Building Energy Efficiency Standards, 2008 Standards Background and Objectives <<http://www.energy.ca.gov/title24/2008standards/background.html>> (as of May 31, 2007).) Similarly, Executive Order 2-3-05, the Climate Action Initiative, identifies Title 24 Building Standards as an explicit strategy in a menu of actions that will be necessary to meet the goals of the Climate Action Initiative.

In recognition of the State's ongoing efforts to reduce GHG emissions, the following mitigation measure is hereby added:

4.13-1q: *The County shall monitor and support the efforts of the California Air Resources Board, the California Energy Commission, the California Public Utilities Commission, the California Power Authority, and any other State Agency charged with reducing California's contribution to global climate change to formulate mitigation strategies, if any, that may be implemented on a voluntary basis by local government. If and when any such strategies become available, the County shall condition site-specific approvals under the Placer Vineyards Specific Plan on the adoption of such measures if the County Board of Supervisors determines that such measures are feasible. As used in this Mitigation Measure, "feasible" means: 1) the mitigation strategy has been successfully demonstrated in the same or very similar application; 2) the mitigation strategy has been demonstrated in a similar development such that application of the mitigation strategy to the Placer Vineyards site specific development is appropriate; and 3) the mitigation strategy is cost effective in terms of the number of dollars that would be expended per metric ton of GHG emissions reduced.*

In light of the foregoing, the County declines at present to go as far as the commenter suggests and impose an inflexible requirement necessitating the installation of solar water heaters on "each home" in Placer Vineyards. Although, as is evident from the preceding discussion, the County is prepared to require the project proponents to achieve energy consumption reductions in residential uses of between 10 to 20 % beyond what Title 24 requires (with solar water heaters as one means of achieving that result), and is also willing to consider any future GHG reduction strategies that various state agencies may develop in the coming years, the County is not prepared at present to adopt a measure requiring *all* future Placer Vineyards residents to have solar heaters on their places of residence. It may be that, as the state agencies focusing on GHG emission reduction strategies pursuant to AB 32 provide additional guidance to local agencies in the future, they may conclude that there are more cost-effective means than mandatory solar water heaters to reduce such emissions. To the extent, moreover, that Title 24 may be modified in the future to require solar water heaters, any such new requirements presumably would apply to any structures within Placer Vineyards that had not yet received building permits.

Because development in Placer Vineyards cannot commence in earnest until the proponents obtain their federal Clean Water Act and Endangered Species Act approvals (a process that might take a year or more after specific plan approval), and because the build-out period for Placer Vineyards could be as long as 20 years or more, depending on market conditions, and because any new Title 24 requirements arising out of AB 32 should be in place in just a few years, there is a strong possibility that the vast majority of residential units built in Placer Vineyards will have to comply with any such new requirements.

Another factor of concern to the County is the prospect that it might impose on Placer Vineyards builders additional per-unit costs that competing builders within the same overall regional market are not required to bear, giving those other builders a competitive advantage over the Placer Vineyards builders, and creating the prospect of a patchwork of differing standards around the region or even the state. Such problems would not exist, however, if the State were to impose new solar requirements applicable to all new residential development. Under such a scenario, no jurisdiction could gain an advantage over another; and the building industry would not face a patchwork of different rules on solar power in different local jurisdictions in the region and the state as a whole.

Response 59E: The commenter refers to an article from the Seattle Times dated March 31, 2007, discussing a development that will result in zero energy homes. Notably, as described by the Seattle Times article attached to the comment letter, only 2000 zero-energy homes have been built in the United States since 2003. To the extent that the commenter is suggesting that the County add a Mitigation Measure requiring zero energy homes, the County responds that such a measure would be infeasible for the same reasons discussed in Response to Comment 59D.

The commenter states that, although zero energy homes may not be feasible for the project, the installation of solar electric panels on each house is feasible. The commenter notes that the cost per home would be approximately \$23,000.00 dollars. After the initial cost of installation, energy costs associated with each unit would be reduced thereby lowering carrying costs. As noted, the Revised Draft EIR identifies installation of solar panels as one of the measures that could be imposed to achieve the 10 to 20% reduction in residential energy consumption relative to the requirements of Title 24. A mitigation measure demanding solar panels for each unit would, however, be infeasible for the same reasons a mitigation measure demanding solar water heaters for each unit would be infeasible. See Response to Comment 59D.

Response 59F: Commenter suggests that project developers can be required to purchase offsets by financing windmill production of electricity to offset the project's contribution to greenhouse gas emissions. The commenter does not provide any examples programs that would allow project developers to purchase such off-sets or finance windmill production or any evidence that such a measure would be feasible. The applicants have researched the availability of such programs and have been unable to identify any such program. Notably, AB 32 permits ARB to adopt a market-based cap and trade system with associated limits on the State's greenhouse gas sources. If ARB adopts a cap and trade strategy for reducing greenhouse gas emissions, the County will consider that program pursuant to Mitigation Measure 4.13-1q. Such a program may include a requirement for developers of local projects to purchase energy offsets. (See also Response to Comment 59D.)

Response 59G: Commenter suggests that feasible mitigation would include requiring all light bulbs in all houses to be energy saving compact fluorescents. The commenter provides no basis as to why such a measure would be feasible, and as such, it is difficult to respond to the commenter's suggestion. Even so, however, Mitigation Measure 4.8-3b has been modified to list the use of compact fluorescent light bulbs as a mechanism for achieving the required 10 to 20% reduction in overall residential energy consumption relative to Title 24 requirements. As noted in Response to Comment 59B, the project is at an early stage in the planning process. If the

County Board of Supervisors approves the Specific Plan, build-out would not be complete until at least 25 years after the approval. At this early stage in the development process, it is impossible to determine which mitigation measures would produce the greatest GHG emission reductions in relation to costs and which energy saving technological advances would be most appropriate for development under the proposed Specific Plan. For that reason, the menu of options provided by Mitigation Measure 4.8-3b that, if implemented, will result in a 10 to 20% reduction in residential energy consumption above Title 24 requirements, is the most appropriate way to incorporate energy saving technologies, such as compact fluorescent light bulbs, into mitigation for the PSVP project. See also Response to Comment 59D.

Response 59H: Commenter suggests that Placer County should be required to purchase only hybrid service vehicles for the Placer Vineyards area. The commenter does not provide any facts or evidence detailing the extent to which requiring the purchase of hybrid service vehicles would reduce the project's impact on global climate change. Rather, the commenter notes, in general terms, that requiring the County to purchase only hybrid service vehicles for the Placer Vineyards Specific Plan area would reduce both CO₂ emissions and other air pollutant emissions. The County believes that requiring the purchase of hybrid service vehicles is not an appropriate measure for a Specific Plan proposal, and would best be suited for the County's General Plan Update or some similar legislative process dealing with the County's own practices, as opposed to the regulation of private sector activities. The Specific Plan is a private development application in the sense that the property owners are private individuals and companies. County action on a private development proposal for a small portion of the County is not an appropriate vehicle for adopting policies requiring the County to change its own practices, which presumably would be applicable County-wide.

More importantly, there is no overall practical and cost-effective guide, including best management practices, for local governments to reduce GHG of public fleets. As described in Section 4.8 of the Revised Draft EIR, at a local level, air quality is managed through land use and development planning practices that are implemented by Placer County, and through permitted source controls that are implemented by the PCAPCD. The PCAPCD is also the agency responsible for enforcing many federal and State air quality requirements, and for establishing air quality rules and regulations. To date, the PCAPCD has not been required to implement or enforce any air quality requirements related to GHG emissions.

Significantly, measures included in the PCAPCD's Air Quality Attainment Plan (AQAP) include measures that would promote the same type GHG emission reductions and other air pollutant emissions that the commenter suggests a hybrid fleet would promote. In particular, the AQAP measures include:

- Area-wide carpool/vanpool matching and assistance;
- City or County trip reduction ordinances;
- In new developments, provision of bikeways and bicycling support facilities and amenities such as sidewalks, adequate crosswalks, and building entries near sidewalks rather than behind large parking lots;

- Use of alternative motor fuels and energy sources;
- Jobs-housing balance requirement for new developments;
- Mixed use land use requirement;
- Transit service expansion and operational changes;
- Parking space limitations; and
- Suburban fringe area park-and-ride lots.

At present, the PCAPCD have a policy relating to the purchase of hybrid service vehicles. Because it is not known to what extent requiring hybrid service vehicles in the project area would reduce the project's impact above and beyond the measures identified by the AQAP, the County believes that the measure proposed by the commenter is not feasible.

Response 59I: Commenter suggests that the County should adopt a ban on the use of gas powered lawn mowers and gardening equipment as a CC&R in the Project area. The commenter does not provide a factual basis as to why a ban on gas powered mowers and gardening equipment as a CC&R would be a feasible and/or effective mitigation measure for the PVSP project's impact on global climate change. For the same reasons discussed in Responses to Comments 59D and 59H, a CC&R requiring a ban on the use of gas powered law mowers and gardening equipment is infeasible. In addition, many homeowners are expected to hire private landscape maintenance companies to mow their lawns. Because such companies use their own equipment, and because neither State law nor local ordinance prohibits the use of gasoline powered equipment, any measure requiring only electric lawnmowers would be unenforceable. However, to encourage the use of electrically powered equipment and to make such usage feasible in the future, Revised Draft EIR Mitigation Measure 4.8-3c is hereby amended as follows:

4.8-3c Promote a reduction in residential emissions through implementation of the following measures:

- *Prohibit any wood-burning fireplaces, woodstoves, or similar wood-burning devices. Homes may be fitted with UL rated natural gas burning appliances if desired. This prohibition shall be included in any CC&Rs that are established.*
- *Encourage the installation of conveniently located electrical outlets within the front, side, and rear yards of all residential structures, as appropriate, to support the use of electrical landscaping equipment.*

The commenter is also referred to Mitigation Measure 4.8-3k wherein new technologies and future feasible mitigation measures may be incorporated into the project.

Response 59J: Commenter objects to omission of a Roseville AM peak analysis in the Second Partially Recirculated Revised Draft EIR. As described in Response to Comment 15EE of the Final EIR, the Roseville General Plan is specific to operations of its signalized intersections during the PM peak hour. Although the commenter suggests that the City is "silly" to proceed in this fashion, the adopted City of Roseville General Plan, 2002, on page III-14 states that: "In Roseville, levels of service are measured during a weekday afternoon peak period since it generally represents the highest hour for overall traffic volumes during the week." Further, Circulation Element Policy "1." provides as follows: "Maintain a level of service (LOS) "C" standard at 70 % of all signalized intersections and roadway segments in the City during the p.m. peak hours." (Emphasis added). Because the General Plan provides the threshold for determining when a potentially significant impact may occur, the AM peak analysis would be useless information that would play no role in guiding future decisionmaking.

CEQA Guidelines Section 15064.7(b) provides that "Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence." The current threshold used by the City of Roseville (and by the County for impacts within the City of Roseville) meets this standard. No similar threshold exists for AM traffic analysis within the City of Roseville.

Response 59K: Commenter states that the analysis of the grade crossing of Riego Road over the UPRR tracks is inadequate, and that the Federal Railroad Administration's procedure for estimating the number of accidents should have been used.

As stated on page 4.7-26 of the Second Partially Recirculated Revised Draft EIR, the rail crossing has warning lights and crossing gates, which would be used to keep the tracks clear of vehicles when trains come. These features can be coordinated with the signals at the nearest intersection to ensure that there is time for the intersection and tracks to clear before a train passes. The PUC must issue a permit for any modification at any grade crossing under Public Utilities Code Sections 201-1205. Therefore, when the crossing is widened, the PUC will determine if such features are adequate for the widened road, or if a grade separation is necessary.

For a discussion of the Federal Railroad Administration's "Gradedec.net", please see Response to Comment 38C in the Final EIR. As noted in that response, Gradedec.net analyzes the costs and benefits of a grade separation, but does not provide thresholds to determine when a grade separation is warranted.

Please also see Responses to Comments 63A and 63B.

Response 59L: Commenter claims that EIR is based on faulty traffic forecast data. The comments are a restatement of comments made on the Revised Draft EIR and Final EIR. See Final EIR Responses to Comments 15FF, 15HH, 15II, and 15JJ. Also see Responses 3L-MM, 3L-NN, and 3L-TT herein.

Response 59M: Commenter claims that EIR remains inadequate. Comment noted. The County disagrees and is of the opinion that all of the commenter's many and repetitive comments have been responded to in a manner consistent with the intent and purpose of CEQA.

Placer County Water Agency

Business Center: 144 Ferguson Rd. • Mail: P.O. Box 6570 • Auburn, California 95604-6570
(530) 823-4850 800-464-0030 www.pcwa.net

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RECEIVED

MAY 14 2007

ENVIRONMENTAL COORDINATION SERVICES

May 14, 2007
File No. WA/Dry Creek/West Placer

Maywan Krach
Placer County Community Development/ Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

SUBJECT: Revised Draft Environmental Impact Report for
Placer Vineyards Specific Plan (PEIR 20040651)

Dear Ms. Krach:

This letter is in response to your request for review on the Revised Draft Environmental Impact Report (Revised DEIR) for Placer Vineyards Specific Plan.

California American Water Company's contract, dated September 5, 2002, with PCWA states that California American Water Company shall provide and operate such storage facilities as are necessary to enable it to meet customer peak demands not provided for by the maximum instantaneous flow rate. Based on the fact that California American Water Company has not constructed a water storage tank, they have continued to peak off of PCWA and the City of Roseville water systems. This has required a higher instantaneous flow rate than if there were adequate water storage facilities in place.

A

The following comments should be reflected as appropriate throughout the Revised DEIR.

On page 4.3-5, 3rd paragraph, should be revised to, "the 10 MGD instantaneous flow limitation on PCWA water deliveries...".

B

Page 4.3-5, 4th paragraph, 2nd sentence indicates approximately 8.15 MGD of the pipeline capacity is currently unutilized based on July 2006 peak day flow rate. Based on more current information, this should be revised to the following: It has been determined that approximately 6.41 MGD of the pipeline capacity (enough water to supply over 5,500 dwelling units) is currently unutilized based on July 2006 instantaneous flow data. It should be noted that this flow rate taken by Cal American Water Company could be reduced upon completion of their planned water storage project.

C

On page 4.3-6, 2nd paragraph, 2nd sentence should be revised to, "By making piping modifications and increasing the filtration rate from 5 GPM to 6 GPM the initial phase (the first 15 MGD) of the plant is capable of treating an additional 3 MGD." In the same paragraph, the 3rd sentence should be revised to, "This additional treatment rate was tested over a three year period, and needs to be reviewed and approved by the State of California Department of Health Services."

D

If you have any questions please call me at (530) 823-4886.

Sincerely,

A handwritten signature in black ink that reads "Brian C. Martin". The signature is written in a cursive style with a large initial "B" and a long horizontal line extending from the end of the name.

Brian C. Martin, P.E.
Director of Technical Services

BCM:HT:ns

pc: Einar Maisch
Heather Trejo
Tony Firenzi

LETTER 60 BRIAN C. MARTIN, P.E., DIRECTOR OF TECHNICAL SERVICES, PLACER COUNTY WATER AGENCY (PCWA)

Response 60A: Commenter describes circumstances regarding California American Water Company's obligation to construct a water storage tank and notes that because the tank has not been constructed to date, a higher instantaneous flow rate is required. Comment noted. Calculations used in the Partially Recirculated Revised Draft EIR assumed that the tank would be in place. It is the County's understanding that tank construction completion is now targeted for 2009, which is consistent with the earliest projected date for housing construction within the Placer Vineyards Specific Plan project area. See also Response to Comment 60C.

Response 60B: Commenter requests that the 10 MGD limitation on PCWA water deliveries through the Roseville-owned system be identified as "instantaneous flow". Comment noted. The first sentence of the second complete paragraph on page 4.3-5 of the Second Partially Recirculated Revised Draft EIR is hereby revised as follows:

There is a 10 MGD instantaneous flow limitation on PCWA water deliveries through the Roseville-owned system.

Response 60C: Placer County Water Agency (PCWA) states that the amount of water available from PCWA's supply delivered through City of Roseville infrastructure should be reduced from 8.15 million gallons a day (MGD) to 6.41 MGD, because, pursuant to the terms of the wheeling agreement between PCWA and the City of Roseville, there is a 10 MGD "instantaneous" flow limitation on PCWA water deliveries from the pipeline rather than a limitation based on peak day demand.

Based on a July 2006 peak day flow rate of 1.85 MGD (equivalent to an instantaneous flow of 1,280± gallons per minute (GPM)), the available capacity from the 10 MGD supply (equivalent to an instantaneous flow of 6,940 ± GPM) was calculated to be 8.15 MGD. However, additional review of the July 2006 flow data reveals that maximum instantaneous flow rates of 2,490± GPM occurred during the month. Using the "instantaneous" flow limitation, there is approximately 4,450± GPM (6,940 GPM less 2,490 GPM) of remaining capacity available from the pipeline. The instantaneous flow rate of 4,450± GPM converts to a daily flow rate of 6.41± MGD.

The Placer County Water Agency currently wholesales the majority of its water supply taken from the 10 MGD source to the California American Water Company (CalAm). The agreement between PCWA and CalAm requires CalAm to provide and operate storage facilities as necessary to meet peak customer demands not provided for by the maximum instantaneous flow rate. To date CalAm has not constructed the required water storage facilities and is instead utilizing pipeline capacity to meet peak flow demands, resulting in higher "instantaneous" flows from the 10 MGD supply.

CalAm is currently designing storage facilities that are intended to be constructed in 2008 with completion and operation in 2009. When the facilities are operational, the instantaneous flows in the 10 MGD supply pipeline should be reduced and capacity available from the supply restored.

Commencement of infrastructure construction and initial water demands within the Placer Vineyards Specific Plan Area are projected to begin in 2009, after the storage facilities are constructed.

If for some reason CalAm does not meet its contractual obligations and construct storage facilities in a timely manner, the secondary initial surface water supply or alternative supply identified in the Second Partially Recirculated Revised Draft EIR would be utilized sooner than originally anticipated to augment water supply to the Placer Vineyards Specific Plan.

Response 60D: Commenter requests minor changes to the description of modifications required at the Foothill Water Treatment Plant. Comment noted. The first full paragraph on page 4.3-6 of the Second Partially Recirculated Revised Draft EIR is hereby modified as follows:

PCWA is currently designing a method to increase water treatment capacity at its Foothill Water Treatment Plant. By making piping modifications and increasing the filtration rate from 5 GPM to 6 GPM the initial phase (the first 15 MGD) of the plant is capable of treating an additional 3 MGD. This would increase the Foothill Water Treatment Plant to 58 MGD. This additional treatment rate was tested over a three year period, ~~then~~ and needs to be reviewed and approved by the State of California Department of Health Services. To deliver the increased capacity, PCWA needs to construct 400-500 linear feet of transmission piping within the existing footprint of the Foothill Water Treatment Plant. The pipeline construction is expected to be complete in 2008.



Community Development

311 Vernon Street
Roseville, California 95678-2649

May 16, 2007

Mywan Krach
Placer County Community Department Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn, CA 95603

Via: Electronic and Regular Mail

Page 1 of 2

Subject: City Comments on the 2nd Partially Recirculated Revised Draft Environmental Impact Report for the Placer Vineyards Specific Plan (PVSP)

Dear Ms. Krach:

Thank you for the opportunity to review and comment on the 2nd Partially Recirculated Revised Draft Environmental Impact Report (DEIR) for the PVSP. The recirculated draft shows a conceptual alignment for a future water line through the Brookfield project site as well as the proposed Creekview and Sierra Vista Specific Plans (Figure 6-14). The recirculated draft identifies these areas as “agricultural” with no mention of their current status, especially the Creekview and Sierra Vista projects which are both located within the City/County MOU area and are pending City of Roseville annexation/specific plan projects. Considering these projects are in the preliminary planning stage it is recommended that the County closely coordinate the potential siting and construction of this off-site water line with the City as the City’s specific plan projects move forward.

A

In addition to the above general comment, the following specific comments are provided by the City’s Environmental Utilities Department.

- 1) Page 4.3-5 – 4th Paragraph: This section identifies that there is currently 8.15 MGD capacity available through the City of Roseville water conveyance system for growth to the west of Roseville. Based on current use patterns there is only 6 MGD available as the use is based on peak demand. Without the addition of storage in the receiving system(s), the proposed wheeling supply cannot be managed to fully utilize the transmission capacity.
- 2) Page 6.3-16 – Alternative Long-Term or Buildout Surface Water Supply Supplemental Analysis, Folsom Alternative: Included in this section is a discussion of Roseville pipelines that were designed and constructed to meet Roseville demands. This section identifies use of existing pump stations and transmission pipelines; however there is no information or analysis to demonstrate that these facilities include the excess capacity that would be required under this alternative. It also identifies a new diversion tapping Folsom Dam Penstock number 1 and 2 for water supply. This project has been abandoned and will not be pursued. As originally planned it also was not intended to increase diversion capacity but rather was to be used to increase reliability of existing diversions points during emergencies or periods when major maintenance activities are required.

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The City of Roseville will continue to work closely with the County to address these comments so as to ensure project impacts to the City of Roseville are properly identified and fully mitigated to the extent feasible in accordance with the Settlement Agreement. Should you have any questions concerning this letter, please feel free to contact me at 774-5334.

D

Sincerely,



Mark Morse
Environmental Coordinator

cc: John Sprague
Paul Richardson
Kathy Pease
Kelye McKinney
Ed Kriz

LETTER 6I MARK MORSE, ENVIRONMENTAL COORDINATOR, CITY OF ROSEVILLE COMMUNITY DEVELOPMENT DEPARTMENT

Response 6IA: Commenter notes that the alignment of the proposed future alternative offsite utility corridor passes through areas for which preliminary planning is currently underway for development project. Comment noted. All of the projects referenced by the City are shown on Figure 4.1-2 of the Revised Draft EIR with the exception of “Brookfield,” for which a map was not available at the time of Revised Draft EIR publication. It is the County’s understanding that Brookfield would be located north of the Creekview Specific Plan. The proposed pipeline will be ultimately be constructed by PCWA. The alignment shown in the Second Partially Recirculated Revised Draft EIR is conceptual and subject to change as more specific planning for the route is performed by PCWA.

Response 6IB: Commenter notes the need for additional water storage to realize the 8.15 MGD capacity available through the Roseville water conveyance system. See Responses to Comments 60A and 60C.

Response 6IC: Commenter discusses the Folsom Reservoir alternative water supply appearing on page 6.3-16 of the Second Partially Recirculated Revised Draft EIR. This alternative was carried forward because it appeared in the original Draft EIR, based on work then in progress (2001-2004). It is recognized that this is no longer a preferred option, but in order to provide full disclosure of all water supply possibilities, it was left in the analysis. It is not intended that existing Roseville pipelines would be used under this option. It is assumed that new pipelines and pump stations would be necessary, in some cases paralleling existing Roseville facilities. Other information appearing in the EIR was taken directly from the Sacramento River Water Reliability Study Initial Alternatives Report and reflects the description therein.

Response 6ID: Commenter expresses willingness to continue to work with the County in accordance with the Settlement Agreement. Comment noted. The County is proceeding with the expectation that all identified impacts on the City of Roseville have been addressed.



SUTTER COUNTY
COMMUNITY SERVICES DEPARTMENT

Animal Control
Building Inspection
Emergency Services
Environmental Health
Fire Services
Planning

Larry Bagley, Director
Randy Cagle, Ass't. Director,
Permitting Services
Vacant, Fire Services
John DeBeaux,
Emergency Services

May 16, 2007

Maywan Krach
Placer County Community Development Resource Agency
Environmental Coordination Services
3091 County Center Drive
Auburn CA 95603

Re: Placer Vineyards Second Partially Re-circulated Revised Draft EIR

Dear Mr. Krach:

Sutter County thanks you for the opportunity to comment on the above listed project.

As you are aware, Sutter County has previously expressed concern about the unmitigated traffic impacts this project could have upon roadways in our jurisdiction. Our concern continues in this revised project. Sutter County offers the following comments.

1. The EIR inadequately concludes the traffic impacts in Sutter County from the project as significant and unavoidable because the improvements set forth in the mitigation measures lie outside the jurisdiction of Placer County and Placer County cannot compel Sutter County to make the needed improvements. Sutter County contends that any traffic impact mitigation measures necessary in Sutter County as a result of the project are the immediate responsibility of Placer County and Placer County's reliance on future uncertain Sutter County projects with potentially overlapping traffic impacts is not sufficient mitigation of the impacts from this project. Placer County should provide adequate mitigation now for the traffic impacts in Sutter County and negotiate with Sutter County for reimbursement from future applicable Sutter County projects.
2. The new traffic signals on Riego Road (under existing plus approved) will impose an annual maintenance burden on Sutter County unless and until the Sutter Pointe Specific Plan is approved by Sutter County. A funding mechanism needs to be established to pay for the annual maintenance of these new signals on Riego Road until such time as additional development is established in south Sutter County.
3. Signalization of Pacific Avenue and Riego Road has not been adequately addressed. Protected east bound turns from Pacific Avenue and north bound turns from Riego Road with Surface Transportation Assistance Act (STAA) trucks would be difficult to impossible to negotiate (this is a designated T-Route) during peak hour traffic.

A

B

C

4. An increase in roadway capacity for Riego Road, County Bridge #18C0050, the bridge that crosses Reclamation District 1000 canal west of Pacific Road and the Union Pacific rail line have not been sufficiently addressed in the existing plus cumulative project scenario as we have previously expressed.

D

5. Sutter County requests that negotiations commence immediately on the Specific Plans "fair share" contributions, since Sutter County cannot know if impacts will be mitigated until a "legally enforceable" funding agreement is negotiated. Sutter County requests the adoption of the final EIR be delayed until successful negotiations have been concluded and a Funding Agreement has been adopted by both counties.

E

Sutter County contends that Placer County is responsible for fully mitigating traffic impacts resulting from Placer County projects upon Sutter County roadways. If the Sutter Pointe Specific Plan is not approved, then Placer Vineyards is responsible for paying for all necessary road improvements to Sutter County roads that are impacted by the Placer Vineyards project.

F

In summary, Sutter County has grave concerns about the inadequacy of the EIR and mitigation measures proposed. Sutter County objects to the adequacy of the EIR, the adequacy of Placer County's responses to our comments, the approval and certification of the EIR and approval of the project. We request that sufficient time be provided for resolution of the traffic impact issues between our counties. Sutter County will not accept inadequately mitigated effects from this project.

G

Please provide our office with all future notices regarding this project.

Sincerely,

Doug Libby, AICP
Senior Planner

DL:rlb

cc: Al Sawyer, Assistant Public Works Director

LETTER 62 DOUG LIBBY, AICP, SENIOR PLANNER, SUTTER COUNTY COMMUNITY SERVICES DEPARTMENT

Response 62A: Commenter states that the EIR conclusion that traffic impacts in Sutter County are significant and unavoidable because they are outside the jurisdiction of Placer County is not adequate. Placer County is not aware of any mechanism whereby it can cause improvements to be made in another jurisdiction. Nonetheless, the Revised Draft EIR (including the first and second partially recirculations) recognizes that there will be impacts in Sutter County due to the Proposed Project. Impacts are quantified and mitigation measures are identified (see Impacts 4.7-7, 4.7-8, 4.7-17 and 4.7-18). Placer County is prepared to require the project applicant to fund the project's fair share of improvements if and when Placer County and Sutter County enter into a reciprocal agreement, as called for by Mitigation Measure 4.7-2(a). Because such an agreement has not yet been made, and Placer County cannot compel Sutter County to construct the improvements needed to mitigate project impacts, regardless of funding source, the impacts on Sutter County are considered significant and unavoidable.

Response 62B: Commenter states that the traffic signals to be constructed on Riego Road would impose an annual maintenance burden on Sutter County unless and until the Sutter Pointe Specific Plan is approved. Please see Final EIR Response to Comment 38B.

Response 62C: Commenter states that northbound turns from Riego Road to Pacific Avenue would be difficult for trucks to negotiate during the peak hour, so signalization of the intersection has not been adequately analyzed. The California MUTCD (Manual Uniform Traffic Control Devices) does not have a provision for lowering the volume requirements to justify the installation of a traffic signal due to "significant" truck traffic. Furthermore, most southbound traffic would be turning right, and could be accommodated by a right turn lane with an acceleration lane, so the full southbound traffic volume should probably not be used in the signal warrant analysis.

Response 62D: Commenter states that effects on a Reclamation District 1000 canal and the UPRR rail line of the increased roadway capacity for Riego Road has not been adequately addressed. Widening of Riego Road is not needed under Existing plus Project conditions, as discussed in Impact 4.7-7. Under Cumulative conditions, it is assumed that Riego Road would be widened to six lanes with or without the Proposed Project. The UPRR crossing and the bridge would be addressed when Riego Road is widened. Please also see Final EIR Response to Comment 59K.

Response 62E: Commenter requests that negotiations begin immediately on the Proposed Project's fair share contribution to mitigation measures in Sutter County. Placer County is ready to begin discussions with Sutter County at any time. Please see Response to Comment 62A.

Response 62F: Commenter states that Placer County is responsible for fully mitigating traffic impacts from Placer County projects and that if Sutter Pointe is not approved, then Placer Vineyards would be responsible for funding all necessary road improvements on Sutter County roads affected by the Proposed Project. As discussed in Response to Comment 62A, Placer County is prepared to require that the project applicant pay its fair share toward the identified

mitigation in Sutter County once an agreement with Sutter County has been reached. The project's fair share is dependent on the number of trips generated by other projects in addition to Placer Vineyards. Such projects could include Sutter Pointe. If Sutter Pointe is not constructed, Placer Vineyards relative share of project mitigation would increase, but at the same time the cumulative impacts on the roadway would be reduced, which could alter the mitigation.

Response 62G: Commenter closes with grave concerns about the inadequacy of the EIR and mitigation measures. Comment noted. Please see Responses to Comments 62A through 62F.

PUBLIC UTILITIES COMMISSION

605 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 16, 2007

Maywan Krach
Placer County
3091 County Center Drive
Auburn, CA 95603

RE: Placer Vineyards Specific Plan, SCH# 1999062020

Dear Ms. Krach:

The Second Partially Recirculated Revised Draft Environmental Report predicts very poor levels of service (LOS) at both the Natomas Road/Riego Road and Pleasant Grove/Riego Road intersections, with LOS of F occurring in both the am and pm peaks; additional analysis on the Riego Road railroad crossing to determine if traffic will queue onto the rail crossing. Gridlock traffic can cause frustrated motorists to take risks, therefore raised medians should be considered as an improvement at the rail crossing to help prevent drivers from circumventing downed railroad gates.

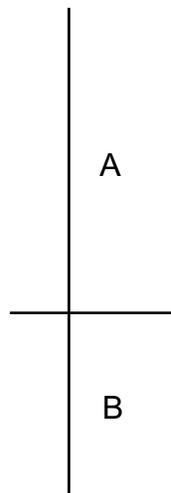
The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians in the County.

If you have any questions in this matter, please call me at (415) 703-2795.

Very truly yours,

Kevin Boles
Environmental Specialist
Rail Crossings Engineering Section
Consumer Protection and Safety Division

cc: Terrel Anderson, Union Pacific Railroad
Lisa Carvalho, Steefel, Levitt & Weiss



LETTER 63 KEVIN BOLES, ENVIRONMENTAL SPECIALIST, PUBLIC UTILITIES COMMISSION

Response 63A: Commenter states that additional analysis is needed to determine if traffic will queue onto the railroad tracks given service levels at Natomas Road/Riego Road and Pleasant Grove/Riego Road. Under Existing plus Project and Existing plus Blueprint conditions, there could be some queuing of vehicles on Riego Road from Natomas Road in the AM peak hour and from Pleasant Grove Road North in the PM peak hour. Without mitigation, these queues could extend beyond the tracks. However, the Mitigation Measure 4.7-8, which requires that traffic signals be installed at these intersections, will prevent the queues from reaching the tracks.

Under Cumulative plus Project and Cumulative plus Blueprint conditions, the eastbound PM peak hour queue from Pleasant Grove Road North could queue on Riego Road past the railroad tracks about 20% of the signal cycles. This can be prevented by installing a queue detector on Riego Road that will detect the queue approaching the tracks and then preempt the signal at Pleasant Grove Road North to stop all other movements and allow eastbound traffic to clear. It is not known what will happen at the Natomas Road intersection due to the Sutter Pointe development.

Response 63B: Commenter states that safety improvements should be considered when approval is sought for new development, and that working with Commission staff early in the conceptual design phase would improve safety to motorists and pedestrians. The rail line nearest the project site is in Sutter County, so Placer County has no jurisdiction over design of the roadway or rail crossing.